



Brent

Cabinet

Monday 11 April 2022 at 10.00 am

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

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

The meeting will be open for the press and public to attend or alternatively can be followed via the live webcast. The link to follow proceedings via the live webcast is available [here](#)

Membership:

Lead Member Councillors:

Portfolio

M Butt (Chair)	Leader of the Council
McLennan (Vice-Chair)	Deputy Leader, Cabinet Member for Resources and Children's Safeguarding, Early Help and Social Care
Farah	Cabinet Member for Adult Social Care
Knight	Cabinet Member for Community Safety and Engagement
Nerva	Cabinet Member for Public Health, Culture & Leisure
Krupa Sheth	Cabinet Member for Environment
Stephens	Cabinet Member for Education, Employment and Skills
Southwood	Cabinet Member for Housing & Welfare Reform
Tatler	Cabinet 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
1 Apologies for Absence	
2 Declarations of Interest	
Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate.	
3 Minutes of the Previous Meeting	1 - 8
To approve the minutes of the previous meeting held on Monday 7 March 2022 as a correct record.	
4 Matters Arising (if any)	
To consider any matters arising from the minutes of the previous meeting.	
5 Petitions (if any)	
To discuss any petitions from members of the public, in accordance with Standing Order 66.	
6 Reference of item considered by Scrutiny Committees	
To consider the Executive response provided to the following Scrutiny Task Group reports from the Community & Wellbeing Scrutiny Committee:	
6.1 Transitional Safeguarding in Brent	9 - 48
This report presents the final report and recommendations from the Task Group established by the Community & Wellbeing Scrutiny Committee to review Transitional Safeguarding arrangements in Brent, along with the proposed Executive response.	
6.2 GP Access in Brent	49 - 108
This report presents the final report and recommendations from the Task Group established by the Community & Wellbeing Scrutiny Committee to review GP Access in Brent, along with the proposed Executive response.	

Community Well-being reports

7 Acquisition of the Affordable Housing site, Neville & Winterleys 109 - 114

This report seeks permission to purchase 101 affordable housing units forming part of the 1 – 8 Neville House, 1 – 64 Winterleys, 113 - 128 Carlton House and Carlton Hall (“NWCC”) housing site forming part of the South Kilburn Regeneration Programme from the developer partner when appointed.

Ward Affected:
Kilburn

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

Contact Officer: Patricia Gillis, Head of Affordable Housing and Partnerships
Tel: 020 8937 2096
Email: Patricia.Gillis@brent.gov.uk

8 Purchase of 115 Affordable Homes from Phase 2 of the Grand Union Development 115 - 124

This report seeks permission to purchase the long leasehold interest of a new-build residential block located at the Grand Union scheme on Beresford Way, Alperton, HA0 1NW.

Ward Affected:
Alperton

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

Contact Officer: Patricia Gillis, Head of Affordable Housing and Partnerships
Tel: 020 8937 2096
Email: Patricia.Gillis@brent.gov.uk

Regeneration and Environment reports

9 Neasden Stations Growth Area Masterplan - Supplementary Planning Document 125 - 264

Brent Council Cabinet on 14th June 2021 approved the draft Neasden Stations Growth Area Masterplan Supplementary Planning Document (SPD) for publication and statutory consultation. This report sets out the results of the consultation feedback, officer considerations and recommended changes to the document and seeks approval to the adoption of the amended Neasden Stations Growth Area Masterplan Supplementary Planning Document.

Ward Affected:
Dollis Hill;
Dudden Hill;
Welsh Harp;
Willesden

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

Contact Officer: Jonathan Kay, Major Projects Team - Regeneration, Growth and Employment

Digital and Customer Services reports**10 Brent's New Customer Promise**

265 - 272

The report outlines the proposed new Customer Promise for Brent, which sets expectations for all interactions between the Council, its residents and customers.

Ward Affected:
All Wards

Lead Member: Deputy Leader (Councillor Margaret McLennan)

Contact Officer: Thomas Cattermole, Director of Customer Access

Tel: 020 8937 5446

Email:thomas.cattermole@brent.gov.uk

11 Exclusion of Press and Public

The following item is not for publication as it relates to the category of exempt information set out below, as specified under Part 1, Schedule 12A of the Local Government Act 1972:

Agenda Item 7: Acquisition of Affordable Housing at Neville & Winterleys – Appendix 1: Preferred Bidder Offer

This appendix is classified as exempt under Paragraph 3 of Part 1 Schedule 12A of the Local Government Act 1972, namely: "Information relating to the financial or business affairs of any particular person (including the authority holding that information)".

12 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 her representative before the meeting in accordance with Standing Order 60.

Date of the next meeting: Monday 30 May 2022



- Please remember to set your mobile phone to silent during the meeting.
- The meeting room is accessible by lift and limited seats will be available for members of the public. Alternatively it will be possible to follow proceedings via the live webcast [here](#).

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LONDON BOROUGH OF BRENT

MINUTES OF THE CABINET

Held in the Conference Hall, Brent Civic Centre on Monday 7 March 2022 at
10.00 am

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

Also present: Martin Smith (Chair of i4B Holding Ltd and First Wave Housing Ltd Boards) for Agenda Items 8 and 9.

1. **Apologies for Absence**

None received.

2. **Declarations of Interest**

Peter Gadsdon and Gail Tolley declared personal interests in relation to Agenda Item 8 (i4B Business Plan 2022-23) and Agenda Item 9 (First Wave Housing Business Plan 2022-23) as Council appointed Directors on the Boards of both i4B & First Wave Housing Ltd.

There were no other declarations of interest made at the meeting.

3. **Minutes of the Previous Meeting**

RESOLVED that the minutes of the previous meeting held on Monday 7 February 2022 be approved as an accurate record of the meeting.

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

None.

5. **Petitions (if any)**

There were no petitions submitted for consideration at the meeting.

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

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

7. **Approval to Establish a New Special School at Secondary Level**

Councillor Stephens (Cabinet Member for Education, Employment & Skills) introduced a report outlining the process and seeking approval to proceed with the establishment of an additional Special School within the borough at secondary level

as part of the refreshed 2019-23 School Place Planning Strategy and Capital Investment Programme for School Place Sufficiency for Children and Young People with Special Education Needs (SEND).

In considering the report Cabinet noted the growing demand for school places that met the needs of children and young people with SEND, as identified within the refresh of the School Place Planning Strategy and new SEND Strategy (2021-25). In order to meet the increasing levels of need and also address the resulting pressures on the High Needs Block of the Dedicated School Grant (DSG) a range of options had been approved by Cabinet on 17 January 2022 which had included the potential build of a new SEND school in the borough. Members commended the work of those officers involved in the subsequent development of proposals for the new school which, subject to the outcome of the Department for Education (DfE) presumption process, it was intended to open in September 2024 providing up to 150 specialist places.

Members noted the indicative timeline for the presumption process and initial contact with the Regional Schools Commissioner (acting on behalf of the Secretary of State for Education) who it was reported had not, at this stage, raised any issues in relation to the proposals.

Having expressed support for the approach and proposals identified within the report Cabinet **RESOLVED**:

- (1) To approve the establishment of a Special School at secondary level on the site known as London Road.
- (2) To approve use of the DfE (Free School) Presumption process to establish the school, as set out in paragraph 3.7 of the report, noting that the final decision on the selected provider will be taken by the Secretary of State for Education.
- (3) To delegate authority to the Strategic Director for Children and Young People, in consultation with the Statutory Cabinet Member for Children's Safeguarding, Early Help and Social Care and the Cabinet Member for Education, Employment and Skills to ratify the full business case and to identify and thereafter recommend to the Secretary of State for Education the Local Authority's preferred provider.

8. **i4B Business Plan 2022-23**

Prior to consideration of the main report Councillor Muhammed Butt (Leader of the Council) invited Martin Smith (as Chair of the i4B Holdings Ltd Board) to introduce the key themes in relation to the current performance, strategic priorities and Development Strategy of i4B as detailed within the company Business Plan presented for consideration. In commenting on the Business Plan, Martin Smith provided a brief overview of i4B's operational performance highlighting the ongoing work to address the main issues identified in relation to voids and rent collection, along with the progress made against the objectives within the 2021-22 Business Plan and key strategic priorities for 2022/23. It was noted these remained focussed around increasing the supply of affordable housing in the borough; running a viable business; delivering safe and sustainable homes; and providing a consistently good

housing service. Cabinet were advised that the delivery of these objectives remained on track with the Business Plan also having identified i4B now moving into surplus.

In addition, members were advised of the Development Strategy for i4B which had been prepared to support the company's ongoing growth ambitions in relation to increasing the supply of affordable housing and in support of the Council's wider Housing Strategy. Whilst continuing the programme of street property purchases the Development Strategy would also focus on the feasibility of setting up a new purchasing stream for adapted accommodation as well as larger family sized properties and new build market opportunities in different areas of the borough.

Having noted the introductory comments from Martin Smith, Councillor McLennan (Deputy Leader and Cabinet Member for Resources, Children's Safeguarding, Early Help and Social Care) then introduced the report presenting, for approval on behalf of the Shareholder, the i4B Holdings Ltd 2022-23 Business Plan. In considering the report Cabinet expressed support for the contribution being made by i4B towards addressing housing need across the borough through the supply of safe, secure and sustainable affordable housing and for the focus within their ongoing Development Strategy in supporting delivery of the Council's wider Housing Strategy.

Having noted that the current performance, strategic priorities and Development Strategy along with the exempt information contained within the appendices of the report, Cabinet **RESOLVED**:

- (1) To approve the i4B 2022/23 Business Plan.
- (2) To approve the content and proposed strategic priorities of the i4B 2022/23 Business Plan.
- (3) To approve the updated financial model contained within the 2022/23 Business Plan.
- (4) To approve the Housing Companies' Development Strategy.

9. **First Wave Housing Business Plan 2022-23**

Prior to consideration of the main report Councillor Muhammed Butt (Leader of the Council) invited Martin Smith (as Chair of the First Wave Housing (FWH) Ltd Board) to introduce the key themes in relation to the current performance, strategic priorities and Development Strategy of FWH as detailed within the company Business Plan which had been presented for consideration. In commenting on the Business Plan, Martin Smith provided a brief overview of FWH's operational performance along with the progress made against the objectives within their 2021-22 Business Plan and key strategic priorities for 2022/23 which, as for i4B, remained focussed around delivering safe and sustainable homes; increasing the supply of affordable housing in the borough; running a viable business; and providing a consistently good housing service. Cabinet were advised that the Business Plan also included detailed on the proposals being developed to progress decarbonisation work across the stock owned by FWH and had also been adjusted to reflect the transfer of the Granville New Homes Blocks to the Housing Revenue

Account (HRA) and i4B. In addition, members were advised that the focus of the Development Strategy referred to as part of the presentation of the i4B Business Plan would also apply in relation to FWH Ltd.

Having noted the introductory comments from Martin Smith, Councillor McLennan (Deputy Leader and Cabinet Member for Resources, Children's Safeguarding, Early Help and Social Care) then introduced the report presenting, for approval on behalf of the Guarantor, the FWH Ltd 2022-23 Business Plan. In considering the report Cabinet again highlighted their support for the contribution being made by FWH towards delivery of the Council's Housing Strategy through the supply of safe, secure and sustainable affordable housing.

Having noted that the current performance, strategic priorities and Development Strategy along with the exempt information contained within the appendices of the report, Cabinet **RESOLVED**:

- (1) To approve the FWH 2022/23 Business Plan.
- (2) To approve the content and proposed strategic priorities of the FWH 2022/23 Business Plan.
- (3) To approve the updated financial model contained within the 2022/23 Business Plan.
- (4) To approve the Housing Companies' Development Strategy.

10. **Annual Complaints Report 2020-21**

Councillor McLennan (Deputy Leader and Cabinet Member for Resources and Children's Safeguarding, Early Help and Social Care) introduced a report setting out complaints performance by Brent Council for the period 1 April 2020 to 31 March 2021. The report included details on complaints performance relating to Adult Social Care and Children's Social Care which it was noted were governed by separate statutory complaint procedures.

In considering the report Cabinet noted the impact on the volume and complexity of complaints as a result of the pandemic along with the work being undertaken with those services identified as receiving the highest number of complaints, including housing repairs, housing customer experience and neighbourhood management, to review the complaints handling process and address the root causes of the complaints being received.

In thanking officers for their efforts in monitoring and managing complaints performance, members welcomed the report as a means of focussing on the nature of complaints received and learning provided to inform the ongoing approach to service improvement for residents.

Having considered the report Cabinet **RESOLVED** to note Brent's performance in managing and resolving complaints as set out in the 2020-21 Complaints Annual Report.

11. **Brent Cyber Security Strategy 2022-2026**

Councillor McLennan (Deputy Leader and Cabinet Member for Resources and Children's Safeguarding, Early Help and Social Care) introduced a report presenting the draft Brent Cyber Security Strategy 2022-2026 for approval.

In considering the report Cabinet noted that the 2022-26 Strategy had been developed to build on the original strategy introduced in 2019 with the aim of significantly fortifying the Council's systems and services against cyber-attack based on shared learning and the key principles within the Government's Cyber Security Strategy 2022-2030 and Cyber Assessment Framework. Members were advised that Brent's Strategy had been aligned with the Shared Technology Service (STS) Cyber Security Strategy and Technology Roadmap, with its delivery supported by a Cyber Security Implementation Plan designed to comply with the principles of the Government's Cyber Essentials scheme, for which the Council had achieved accreditation in February 2022.

In noting the importance of the Strategy, members were advised of the range of activity undertaken in order to secure and safeguard the Council's systems from attack and embed appropriate and proportionate security by design.

Having considered the report and noted the key strategic corporate risk identified in relation to cyber-attack, Cabinet **RESOLVED** to approve the Brent Cyber Security Strategy 2022-2026 as set out in Appendix 1 of the report.

12. **Energy Rebate - Non-Discretionary and Discretionary Scheme**

Councillor Southwood (Cabinet Member for Housing & Welfare Reform) introduced a report which, following the Government's announcement in February 2022 regarding an Energy Bill rebate payment for most properties in Council Tax Bands A to D, provided information on the operation of the non-discretionary scheme. In addition Cabinet was advised that provision had also been made for the creation of a discretionary scheme to support properties in Council Tax Bands E to H. Following additional guidance received from the Government, the report was also therefore seeking approval to the establishment of a discretionary scheme.

Cabinet noted the details provided in relation to the operation, eligibility criteria and promotion of the non-discretionary scheme along with the amendment which had been agreed by Full Council on 24 February to the Council Tax Reduction Scheme in order to disregard energy rebate income.

In terms of the discretionary scheme, members were supportive of the proposed key focus, in terms of the criteria set out in section 3.18 of the report, on those households within property Bands E to H who were in receipt of Council Tax Support, other income related state benefits (but not Council Tax Support) or had applied for welfare support from the Council where fuel poverty had been identified. Members also noted the plans to promote and publicise the discretionary scheme.

In supporting the proposals outlined in the report, Cabinet were keen to recognise the efforts of all those involved in establishing both schemes so rapidly and therefore **RESOLVED**:

- (1) To approve the Energy Rebate Discretionary Scheme as set out in paragraphs 3.17 to 3.20 of the report, which includes the arrangements for residents who live in a dwelling in Council Tax bands E, F, G and H in the borough of Brent.
- (2) To note that the Energy Rebate non-discretionary scheme would be administered in accordance with government guidance issued in February 2022.
- (3) To note the restrictions of the Energy Rebate Discretionary Scheme regarding payments and unspent funding as set out in paragraph 3.21 of the report.
- (4) To delegate authority to the Strategic Director of Customer and Digital Services, in consultation with the Cabinet Member for Housing and Welfare Reform, to make changes that may be required to the discretionary scheme, following a review of the discretionary scheme scheduled to immediately follow phase 2 of the said scheme, as described in paragraph 3.16 (ii) of the report.

13. **Covid Additional Restrictions Fund 2022 – Rate Relief Scheme**

Councillor McLennan (Deputy Leader and Cabinet Member for Resources, Children's Safeguarding, Early Help & Social Care) introduced a report outlining proposals for establishing a discretionary Covid Additional Restrictions Fund 2022 Rate Relief Scheme that would run until the end of September 2022.

In considering the report Cabinet noted that the scheme followed the Government's announcement regarding establishment of a new Covid Additional Relief Fund on which additional guidance had now been received. The fund had been established to support those businesses affected by the pandemic but who had been ineligible (to date) for support linked to business rates for which local authorities were required to establish a discretionary scheme in order to administer support. In relation to the scheme criteria, members were advised that the businesses being targeted in Brent would include those not previously eligible for Covid related rate relief but still identified as being affected by the pandemic within the manufacturing sector (including factories, workshops, warehouses and food processing centres), information and communication sector (including recording and rehearsal studios) along with non retail stores and distribution depots.

In expressing their support for the scheme Cabinet highlighted its positive contribution in relation to the ongoing support being provided for local businesses as part of the recovery programme from the pandemic and therefore **RESOLVED:**

- (1) To approve the Covid Additional Restrictions Fund – Rate Relief Scheme as outlined in paragraphs 3.7 to 3.16 and Appendix 1 of the report pursuant to the Council's powers under section 47 of the Local Government Finance Act 1988 as amended.
- (2) To delegate authority to the Director of Finance and Strategic Director of Customer and Digital Services to implement the scheme as detailed in

Appendix 1 and in accordance with the government's guidance in Appendix 2 of the report.

14. **Authority to enter into a Partnership and Funding Agreement to expand the Brent Electric Vehicle Charging Point (EVCP) Network and to appointment a Charging Point Operator to install and maintain the EVCPs on behalf of Brent**

Councillor Tatler (Cabinet Member for Regeneration, Property & Planning) introduced a report providing an update on the work to expand electric vehicle charging provision in Brent and seeking approval for the Council to enter into a partnership and funding agreement to further expand the charge point network in the borough as well as to the procurement process for the supplying, fitting and maintenance of vehicle electric charging points.

In considering the report Cabinet noted the increase in use and purchase of electric vehicles which had resulted in the need to expand the number of charge points and supporting infrastructure across the borough particularly for those without access to private off-street parking and employed in the taxi and private hire trade. This had resulted in the Council (along with three other London Boroughs) being approached by Uber to enter into a partnership and funding agreement to support the installation of approx. 300 new on street charging points at around 140 locations across the borough, with an outline of the full proposal included within sections 4 – 8 of the report.

In expressing their support for the proposals Members highlighted the positive impact they would have in further assisting to promote cleaner, greener and more sustainable travel options across the borough and in facilitating the welcome increase in use of zero/low-emission vehicles.

Having considered the report along with the information contained in the exempt appendix, Cabinet **RESOLVED**:

- (1) To approve Brent Council entering into an Infrastructure Funding Agreement (IFA) with Uber to receive grant funding for the procurement, installation, operation and maintenance of additional on-street electric vehicle charging points in various locations within Brent.
- (2) To approve inviting tenders for the supply, installation, operation and maintenance of charge points on the basis of the pre-tender considerations set out in paragraph 8.2 of the report and as required by Contract Standing Orders 88 and 89.
- (3) To delegate authority to the Strategic Director Regeneration and Environment, in consultation with the Cabinet Member for Environment and the Cabinet Member for Regeneration, Property and Planning, to award a contract(s) to the successful bidder(s) of the project to provide on-street electric vehicle charge points in residential locations for the term of ten years, as specified in the IFA.

15. **Purchase of Site known as 381-397 Edgware Road, Colindale, NW9**

Councillor Southwood (Cabinet Member for Housing & Welfare Reform) introduced a report seeking permission to purchase the freehold of the site known as 381 – 397 Edgware Road, Colindale, NW9.

In considering the report Cabinet noted the benefits associated with the proposed purchase of the site in terms of it having already secured planning permission and in maximising the opportunity to convert the tenure of the 110 units available to 100% affordable Temporary Accommodated rented as a means of supporting the Council's wider approach towards reducing the reliance on Temporary Accommodation. Members noted that the size breakdown of available units had been confirmed to meet the requirements of existing short and medium term temporary accommodation needs but that the purchase would, subject to approval of the offer outlined within the report, be dependent on acceptance following ongoing negotiations with the developer.

In recognising and commending the ongoing cumulative impact of the work being undertaken to reduce the reliance on use of Temporary Accommodation for those families in housing need, Cabinet **RESOLVED** having noted the contents of the report and exempt information contained within the appendix:

- (1) To approve the proposed acquisition of the freehold interest of the site for purchase price set out in the (exempt) appendix of the report, subject to contract and subject to a) clean and marketable title b) financial and legal due diligence and c) vacant possession, with a target exchange of contract in June 2022.
- (2) To delegate authority to the Strategic Director of Regeneration & Environment in consultation with the Cabinet Member for Regeneration, Property and Planning to negotiate and agree the terms and thereafter enter into a contract with the seller for the purchase of the site.
- (3) To approve the engagement of section 203 of the Housing and Planning Act 2016 (2016 Act) in order to override third party rights and to delegate authority to the Strategic Director of Regeneration & Environment to consult and enter into agreements and if required to pay compensation to third parties whose rights may be affected by the engagement of the 2016 Act

16. **Exclusion of Press and Public**


There were no items that required the exclusion of the press and public at the meeting.

17. **Any other urgent business**

None.

The meeting ended at 10.35am

COUNCILLOR MUHAMMED BUTT
Chair

	Cabinet 11 th April 2022
	Report from the Transitional Safeguarding Scrutiny Task Group
Executive Response to the Transitional Safeguarding Task Group Report of the Community and Wellbeing Scrutiny Committee	

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
Appendices:	Two Appendix 1: Executive Response to the Transitional Safeguarding Task Group Report of the Community and Wellbeing Scrutiny Committee Appendix 2: Transitional Safeguarding Task Group Report
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Craig Player Scrutiny Officer, Strategy and Partnerships 020 8937 1898 craig.player@brent.gov.uk Meenara Islam Strategic Partnership Manager, Strategy and Partnerships 020 8937 1479 meenara.islam@brent.gov.uk Lorna Hughes Head of Strategy and Partnerships 020 8937 5068 lorna.hughes@brent.gov.uk

Purpose of the Report

- 1.1 The purpose of this report is to present the Cabinet's Executive Response to the Transitional Safeguarding Task Group scrutiny report and

recommendations of the Community and Wellbeing Scrutiny Committee for agreement. The scrutiny report was agreed at the meeting of the scrutiny committee on 22 February 2022. The Cabinet's Executive Response is at Appendix 1 to this report.

2 Recommendation(s)

- 2.1 That the Executive Response to the Transitional Safeguarding Task Group scrutiny report and recommendations of the Community and Wellbeing Scrutiny Committee at its meeting on 22 February 2022, be agreed.

3 Detail

- 3.1 The Community and Wellbeing Scrutiny Committee can commission evidence based reviews of a policy area or function of the local authority, which are led by non-executive members. The Transitional Safeguarding Task Group was established to review the development of transitional safeguarding in Brent.
- 3.2 The evolution of transitional safeguarding practice nationally and the development of transitional safeguarding arrangements in Brent made the creation of the scrutiny task group timely, and has enabled members to review these arrangements at an early stage.
- 3.3 The Task Group was asked to produce a written report with recommendations to Brent Council's Cabinet and/or local NHS organisations. The Task Group's interim report was presented to the Community and Wellbeing Scrutiny Committee on 24 January 2022 which included early feedback on their findings. The Task Group's findings and recommendations were presented to the Community and Wellbeing Scrutiny Committee on 22 February 2022 and it was agreed that its final report should be presented to Cabinet. Its final report is set out in detail at Appendix 2.
- 3.4 In accordance with Part 4 of the Brent Council Constitution, (terms of reference for council committees and subcommittees), Brent Council scrutiny committees may make recommendations to Full Council or the Cabinet with respect to any functions which are the responsibility of the executive or of any functions which are not the responsibility of the executive, or on matters which affect the borough or its inhabitants. The Community and Wellbeing Scrutiny Committee may also make recommendations to the relevant NHS bodies or relevant health service providers or Full Council.
- 3.5 The Cabinet is being asked to consider its Executive response to the Transitional Safeguarding Task Group scrutiny report and recommendations of the Community and Wellbeing Scrutiny Committee recommendations and either agree, reject or agree as amended, the scrutiny recommendations made, as set out in the draft Executive Response attached at Appendix 1 to this report.
- 3.6 Scrutiny committees may not make executive decisions. Scrutiny recommendations therefore require consideration and decision by the appropriate decision maker; usually Cabinet, but also full Council for policy and

budgetary decisions and the NHS where it is the decision maker, in accordance with the terms of reference for scrutiny committees, set out in the Council Constitution.

- 3.7 The scrutiny committee will be notified of the Executive decisions made in respect to the scrutiny recommendations and may track the implementation of the Cabinet decisions. This enables the scrutiny committee to track whether their recommendations have been agreed, what actually was agreed (if different) and review any outcomes arising from the scrutiny recommendations, for example, service improvements, value for money savings and outcomes for residents.

4 Financial Implications

- 4.1 It is possible that if a recommendation was accepted and implemented that it may have financial implications for the local authority and/or local NHS organisations. Any financial implications will be reviewed by officers and reported to Cabinet for their consideration and approval.

5 Legal Implications

- 5.1 Section 9F, Part 2 of the Local Government Act 2000, *overview and scrutiny committees: functions*, requires that Executive Arrangements by a local authority must ensure that its overview and scrutiny committees have the power to make reports or recommendations to the authority or the executive with respect to the discharge of any functions which are or are not the responsibility of the executive, or on matters which affect the authority's area or the inhabitants of that area.
- 5.2 Section 9Fe, *duty of authority or executive to respond to overview and scrutiny committee*, requires that the authority or executive;-
- (a) consider the report or recommendations,
 - (b) respond to the overview and scrutiny committee indicating what (if any) action the authority, or the executive, proposes to take,
 - (c) if the overview and scrutiny committee has published the report or recommendations, publish the response, within two months beginning with the date on which the authority or executive received the report or recommendations.

6 Equality Implications

- 6.1 Under Section 149 of the Equality Act 2010, the Council has a duty when exercising their functions to have 'due regard' to the need to:
- a) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act;
 - b) advance equality of opportunity; and
 - c) foster good relations between those who share a "protected characteristic" and those who do not.

- 6.2 This is the Public Sector Equality Duty (PSED). The 'protected characteristics' are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, sex, and sexual orientation.

7 Consultation with Ward Members and Stakeholders

- 7.1 The relevant Cabinet members and Council directorates have been consulted in drawing up this report.

Report sign off:

Shazia Hussain

Assistant Chief Executive

Executive Response to the Transitional Safeguarding Task Group Report of the Community and Wellbeing Scrutiny Committee

11th April 2022

On 22 February 2022, the Community and Wellbeing Scrutiny Committee agreed recommendations to the Cabinet after considering the Transitional Safeguarding Task Group's final report. The Cabinet's Executive Response and decisions against those recommendations are provided below.

Recommendation 1: It is recommended that Brent Council identifies transitional safeguarding as a whole council priority.

Increased pressure on local authorities and partners to respond to complex risks and harms point to the need to consider a new way of working to safeguard young people more effectively. The Task Group believes that providing more effective and fluid support for young people as they enter adulthood not only supports their safety and wellbeing, but may also reduce the need for specialist and statutory services and criminal justice involvement.

Brent Community and Wellbeing Scrutiny Committee should be updated on the progress of this recommendation and seek assurance that the development of transitional safeguarding is considered an organisational priority.

Executive Response:

It is supportive that the Community and Wellbeing Scrutiny Committee has recognised the work undertaken so far on the development of a Brent transitional safeguarding response and the importance of an approach which meets the increasingly complex risks and needs of the most vulnerable young people and young adults in Brent. The task and finish group recommendations will provide helpful impetus to further develop the transitional safeguarding response which is both council wide and also appropriately engages with partners.

Decision: Agreed

Actions:

- i). The Strategic Director, Community Wellbeing and Strategic Director Children and Young People to convene a Transitional Safeguarding Working Group of officers to oversee the development of a Council wide approach to transitional safeguarding by July 2022. This working group to include Community Safety representation.
- ii). The Strategic Director, Community Wellbeing and Strategic Director, Children and Young People to organise a Council wide session on the development of transitional safeguarding to identify contributions and to inform the Brent transitional safeguarding approach by September 2022

- iii). An update on the progress made through the Transitional Safeguarding Working Group on the development of Transitional Safeguarding be presented to Scrutiny Committee by March 2023.

Recommendation 2: It is recommended that Brent Council considers developing a council-wide approach to transitional safeguarding which is evidence-informed, participative and considers equality, culture, diversity and inclusivity.

It is clear that some young people may fall through the gap between children's and adults' services as thresholds for support are not aligned or they fall out of contact with services. The Task Group believes that opportunities for developing multi-agency and integrated models that can better enable a transitional approach to safeguarding should continue to be explored, recognising that the interconnectedness of harms and adversities requires a highly integrated and consistent system of support.

The council-wide approach to transitional safeguarding should be informed by recommendations 3-5. Brent Community and Wellbeing Scrutiny Committee should be updated on the progress of this recommendation and seek assurance that work plans across Brent actively consider and address transitional safeguarding.

Executive Response:

The exploratory work undertaken by the Council's Community Wellbeing and Children and Young People Departments as reported to Scrutiny Committee provides a strong foundation to further develop a shared understanding of the needs of young people and young adults at risk, and based on this enhanced understanding, build an inclusive, joined-up multi agency transitional approach to safeguarding,

Decision: Agreed

Actions:

- i). The Transitional Safeguarding Working Group to identify the priority cohort of young people and young adults who would benefit from a Transitional Safeguarding approach by September 2022.
- ii). The Transitional Safeguarding Working Group to explore with safeguarding partners priority actions to establish a partnership Transitional Safeguarding approach by September 2022.
- iii). Assurance to update on the progress made through the Transitional Safeguarding Working Group on the development of Transitional Safeguarding be presented to Scrutiny Committee by March 2023.

Recommendation 3: It is recommended that Brent Council ensures that young people are active partners in the development of its transitional safeguarding approach.

The Task Group believes that transitional safeguarding should be a participative, user-led approach. This means adopting a collaborative approach; respecting young people's expertise and enabling them to coproduce solutions and support rather than being treated as a passive recipient of support. Services should be responsive to the specific needs of the individual young person and as such should to be flexible, integrated and multi-agency. This user involvement will support the development of effective safeguarding practice, informed by young people whose self-confidence, self-esteem and resilience can be developed through that involvement.

Brent Community and Wellbeing Scrutiny Committee should be updated on the progress of this recommendation and seek assurance that young people are active partners in the development of transitional safeguarding.

Executive Response:

Both CYP and CWB engage young people in the design of services which affect them. Developments in transitional safeguarding to date have been informed by young people, recognising the challenges of safely engaging young people who may be at significant risk.

The principle of engagement and involvement will inform the Councils actions in response to the recommendations of this report, through the identification of where the Council or its partners, including the voluntary sector, have established meaningful relationships with identified young people.

Decision: Agreed

Actions:

- i). The Transitional Safeguarding Working Group to develop a plan to engage young people through relevant Council services, including Housing, the SMART Team and Leaving Care Team, by June 2022
- ii). The Transitional Safeguarding Working Group Work to work with the Young Brent Foundation to identify voluntary sector agencies with relationships in place with identified young people and young adults by June 2022

Recommendation 4: It is recommended that Brent Council considers how it can enhance its support to young people within the transitional safeguarding cohort with needs in education, training and employment (ETE), financial literacy and housing.

The risks young people face are often inter-connected, and a range of risk factors, such as financial difficulties, housing problems, and not being in education, training or employment can co-exist. Strict service criteria or thresholds can generate confusion for young people as the system is complex and it can be difficult for them to work out what support they are able to access. The Task Group believes that some young people therefore need multi-agency support at a more intensive level in order to navigate the complexities of housing, education, training and employment (ETE), finances and further agency support. Brent Council's SMART team offers an example

of good practice within adult social care which can be learned from across services to support young people transitioning to adulthood.

Brent Community and Wellbeing Scrutiny Committee should be updated on the progress of this recommendation and seek assurance that there are measures in place to demonstrate practice change.

Executive Response:

Learning from both the pilot project with Care Leavers and the outcomes from the Brent Council's SMART team have already started to inform multi-disciplinary and multi-agency responses for identified young people and young adults. This early work will be used to develop further the Brent Transitional Safeguarding response.

Decision: Agreed

Actions:

- i). The Transitional Safeguarding Working Group to oversee an extension of the pilot with young people leaving care, broadening the cohort of young people being supported to test and develop support for young adults and to explore pathways of support by September 2022
- ii). The Transitional Safeguarding Working Group to review the SMART teams work to explore how this service model could be mobilised to support vulnerable adolescents in the identified Transitional Safeguarding cohort by September 2022

Recommendation 5: It is recommended that Brent Council promotes transitional safeguarding across safeguarding agencies and services working directly with young people by:

- a. ***Ensuring that Brent's strategic partnerships for children's and adults' safeguarding and Safer Brent Partnership offer multi-agency training for officers, local commissioners and service providers to raise awareness of transitional safeguarding.***
- b. ***Commissioning specialist training for elected and co-opted members to raise awareness of transitional safeguarding and empower them to identify gaps and areas for improvement in local safeguarding practice.***

The Task Group believes that the development of transitional safeguarding requires strong, collaborative leadership to enable creative and coherent practice and services for local residents. It is important that officers, local commissioners and service providers develop their knowledge and understanding of transitional safeguarding issues within the local area, share their expertise and support other professionals to develop their practice. The Task Group also sees elected and co-opted members as well placed to lead across boundaries with their experience of working across services, organisations and sectors, as well as their unique knowledge of the communities they represent.

Brent Community and Wellbeing Scrutiny Committee should be updated on the progress of this recommendation and seek assurance that training is well attended and informs the development of transitional safeguarding across agencies.

Executive Response:

Brent has strong and effective multi-agency safeguarding arrangements in place which have been at the forefront of developing Transitional Safeguarding arrangements in Brent which have been subject to review at the Community and Wellbeing Scrutiny Committee during this Civic Year. These arrangements and the existing strong collaborative leadership of safeguarding for adults and children will be enhanced through the development of a Transitional Safeguarding learning and development offer.

Decision: Agreed

Actions:

- i). The concept of Transitional Safeguarding will be included in the induction for elected members following the elections in May 2022.
- ii). The Transitional Safeguarding Working Group to review training on transition related issues and develop joint Community Wellbeing and Children and Young People-led training for Council officers and appropriate member development for councillors by September 2022.
- iii). The Transitional Safeguarding Working Group to explore opportunities for multi-agency training regarding transitional safeguarding with the Safeguarding Adults Board, Safeguarding Children's Forum and the Safer Brent Partnership.

Cabinet Members: Councillor Farah – Lead Member for Adult Social Care and Councillor McLennan – Deputy Leader and Lead Member for Children's, Safeguarding, Early Help and Social Care

Lead Departments: Community Wellbeing and Children and Young People

Lead Officers: Phil Porter - Strategic Director of Community Wellbeing and Gail Tolley – Strategic Director of Children and Young People

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Transitional Safeguarding in Brent

A Scrutiny Task Group Report

Chair, Councillor Ketan Sheth

**Brent Community and Wellbeing
Scrutiny Committee**

Members of the Task Group

Councillor Ketan Sheth (Chair)

Councillor Anita Thakkar (Vice-Chair)

Councillor Claudia Hector

Reverend Helen Askwith

The task group was set up by members of Brent Council's Community and Wellbeing Scrutiny Committee on 15 November 2021.

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Chair's Foreword



In recent years, safeguarding children and adults has become increasingly complex, with risks such as sexual exploitation, gang and group offending and violent crime challenging the children's and adults' safeguarding workforce to identify opportunities for innovation. The notion of transitional safeguarding is an emerging one, not currently widely applied in policy or practice. Its implementation requires changes in policy and practice and across systems involving all agencies. Many local authority areas are already innovating and creating opportunities for more flexible and bespoke support, providing valuable experiences for young people at a key point in their lives.

Supporting young people's safety and wellbeing during the transition to adulthood is not only morally and ethically important, but it is also important for the future health of society and future generations. Young people may experience a range of risks and harms which may require a distinct multi-agency safeguarding response, and safeguarding support should not end simply because a young person reaches the age of 18. Investing in support to address harm and its impacts at this life stage can help to reduce the need for specialist and statutory intervention and criminal justice involvement later on in life.

The Task Group has been encouraged by the progress Brent has made so far in developing transitional safeguarding. It has come away with optimism that this good work will continue, and hopes that its findings and recommendations help Brent Council to provide leadership in this area through expanded partnership working, meaningful engagement with communities and active knowledge and skills exchange. The Task Group looks forward to seeing how Brent's approach to transitional safeguarding evolves.

Everybody has a valuable contribution to make to the transitional safeguarding agenda. I would like to thank all stakeholders and expert witnesses who gave up their time to meet with the Task Group; I have been impressed with their knowledge, insight and commitment to Brent's young people. I would also like to say a special thank you to Dez Homes, Director at Research in Practice, who kindly gave up her time to share her detailed understanding of the practice of transitional safeguarding and its evolution nationally. Finally, I would like to say a thank you my fellow Task Group members – Councillor Anita Thakkar, Councillor Claudia Hector and Reverend Helen Askwith.

Councillor Ketan Sheth

Chair, Transitional Safeguarding Scrutiny Task Group

Recommendations

The Transitional Safeguarding Task Group makes the following recommendations to Brent Council's Cabinet:

Recommendation 1: It is recommended that Brent Council identifies transitional safeguarding as a whole council priority.

Increased pressure on local authorities and partners to respond to complex risks and harms point to the need to consider a new way of working to safeguard young people more effectively. The Task Group believes that providing more effective and fluid support for young people as they enter adulthood not only supports their safety and wellbeing, but may also reduce the need for specialist and statutory services and criminal justice involvement.

Brent Community and Wellbeing Scrutiny Committee should be updated on the progress of this recommendation and seek assurance that the development of transitional safeguarding is considered an organisational priority.

Recommendation 2: It is recommended that Brent Council considers developing a council-wide approach to transitional safeguarding which is evidence-informed, participative and considers equality, culture, diversity and inclusivity.

It is clear that some young people may fall through the gap between children's and adults' services as thresholds for support are not aligned or they fall out of contact with services. The Task Group believes that opportunities for developing multi-agency and integrated models that can better enable a transitional approach to safeguarding should continue to be explored, recognising that the interconnectedness of harms and adversities requires a highly integrated and consistent system of support.

The council-wide approach to transitional safeguarding should be informed by recommendations 3-5. Brent Community and Wellbeing Scrutiny Committee should be updated on the progress of this recommendation and seek assurance that work plans across Brent actively consider and address transitional safeguarding.

Recommendation 3: It is recommended that Brent Council ensures that young people are active partners in the development of its transitional safeguarding approach.

The Task Group believes that transitional safeguarding should be a participative, user-led approach. This means adopting a collaborative approach; respecting young people's expertise and enabling them to coproduce solutions and support rather than

being treated as a passive recipient of support. Services should be responsive to the specific needs of the individual young person and as such should be flexible, integrated and multi-agency. This user involvement will support the development of effective safeguarding practice, informed by young people whose self-confidence, self-esteem and resilience can be developed through that involvement.

Brent Community and Wellbeing Scrutiny Committee should be updated on the progress of this recommendation and seek assurance that young people are active partners in the development of transitional safeguarding.

Recommendation 4: It is recommended that Brent Council considers how it can enhance its support to young people within the transitional safeguarding cohort with needs in education, training and employment (ETE), financial literacy and housing.

The risks young people face are often inter-connected, and a range of risk factors, such as financial difficulties, housing problems, and not being in education, training or employment can co-exist. Strict service criteria or thresholds can generate confusion for young people as the system is complex and it can be difficult for them to work out what support they are able to access. The Task Group believes that some young people therefore need multi-agency support at a more intensive level in order to navigate the complexities of housing, education, training and employment (ETE), finances and further agency support. Brent Council's SMART team offers an example of good practice within adult social care which can be learned from across services to support young people transitioning to adulthood.

Brent Community and Wellbeing Scrutiny Committee should be updated on the progress of this recommendation and seek assurance that there are measures in place to demonstrate practice change.

Recommendation 5: It is recommended that Brent Council promotes transitional safeguarding across safeguarding agencies and services working directly with young people by:

- a. **Ensuring that Brent's strategic partnerships for children's and adults' safeguarding and Safer Brent Partnership offer multi-agency training for officers, local commissioners and service providers to raise awareness of transitional safeguarding.**
- b. **Commissioning specialist training for elected and co-opted members to raise awareness of transitional safeguarding and empower them to identify gaps and areas for improvement in local safeguarding practice.**

The Task Group believes that the development of transitional safeguarding requires strong, collaborative leadership to enable creative and coherent practice and services for local residents. It is important that officers, local commissioners and service providers develop their knowledge and understanding of transitional safeguarding issues within the local area, share their expertise and support other professionals to develop their practice. The Task Group also sees elected and co-opted members as well placed to lead across boundaries with their experience of working across services, organisations and sectors, as well as their unique knowledge of the communities they represent.

Brent Community and Wellbeing Scrutiny Committee should be updated on the progress of this recommendation and seek assurance that training is well attended and informs the development of transitional safeguarding across agencies.

Introduction

The Transitional Safeguarding Task Group was set up to review the development of transitional safeguarding in Brent. The evolution of practice nationally and the development of transitional safeguarding arrangements in Brent made the creation of the scrutiny task group timely, and has enabled members to review these arrangements at an early stage.

In recent years, safeguarding children and adults has become increasingly complex. Sexual exploitation, gang and group offending and violent crime - including domestic violence and abuse, modern slavery and trafficking - are challenging those involved in safeguarding children and adults to reflect on established models of safeguarding. Safeguarding is a field where binary notions of childhood and adulthood have prevailed and, as such, the notion of transitional safeguarding is an emerging one. Emerging evidence indicates that more effectively meeting the needs of young people as they transition to adulthood may help to avoid later interventions.

Task Group Membership

The Task Group was comprised of the following elected and co-opted members:

- Councillor Ketan Sheth (Chair)
- Councillor Anita Thakkar (Vice-Chair)
- Councillor Claudia Hector
- Reverend Helen Askwith

Terms of Reference

The following Terms of Reference were agreed for the Task Group:

- i) Understand the practice of transitional safeguarding, its evolution nationally and the applicability of its implementation in Brent
- ii) Consider how Brent is developing transitional safeguarding practice as part of an improvement to children and young people's services, and what the current offer is
- iii) Understand Brent's particular social demographics and the scale of the risks for adolescents in Brent
- iv) Explore the next steps and potential further development of transitional safeguarding by the local authority and its partners

Methodology

The Task Group gathered qualitative and quantitative evidence to complete its report and develop its recommendations. In particular, the Task Group carried out a number of evidence sessions with Brent Council officers, Brent Council Cabinet Members, local health commissioners, the police, voluntary and community service sector providers and academics. A full list of those who took part is detailed in Appendix A.

Members of the Task Group took part in three evidence sessions between December 2021 and January 2022. The first evidence session focused on the practice of transitional safeguarding, its evolution nationally and how it is being implemented in Brent. The second evidence session focused on the transitional safeguarding development work being undertaken in Brent and the experiences of transitional safeguarding for frontline staff, young people and families. The third evidence session focused on the next steps for developing transitional safeguarding in Brent, and the lessons that have been learned from other local areas, other services and wider parts of the system.

Recommendations were developed with reference to existing legislation for local authority scrutiny. The Task Group notes that an external body or local authority executive is not compelled to act on a recommendation; however, a local authority executive must respond within two months, and NHS organisations are expected to give a meaningful response within 28 days of recommendations being agreed by a scrutiny committee.¹

Background

Definitions

Definitions of adolescence and young adulthood are a source of some debate. For the purposes of this report, 'adolescence' is used to mean 10-18 years and 'late

¹ Department of Health (2014), Local Authority Health Scrutiny

adolescence' is from 16 years to the early twenties. 'Early adulthood' is understood as overlapping with late adolescence and 'young adults' refers to 18 years to mid-late twenties.² The term 'young people' is used in the report to bring these definitions together and refers to people aged 16-25 years.

The report uses the terms 'risk' and 'harm' to refer to abuse, neglect and the experience of adversity that would trigger a safeguarding response from services, for example a child 'is suffering, or is likely to suffer, significant harm' or 'an adult is experiencing, or at risk of, abuse or neglect'. It also uses the term 'risk' to denote the likelihood of experiencing harm or significant adversity.

'Extra-familial' harm refers to harm that occurs to young people outside of their family system, often during the adolescent years because at this age their social networks widen. The term 'contextual' when used in a safeguarding context refers to environment in which young people grow and develop and the different relationships that they form in their neighbourhoods, schools and online.

The term 'transitional safeguarding' describes the need for "an approach to safeguarding adolescents and young adults fluidly across developmental stages which builds on the best available evidence, learns from both children's and adult safeguarding practice and which prepares young people for their adult lives".³ It focuses on safeguarding young people, from adolescence to adulthood, recognising this period of transition will be experienced differently by young people at different times.

Transitional safeguarding is not simply transition planning for people who are moving from children's social care to adult social care services. It refers to activity that has often fallen outside of the traditional notions of both 'transitions' and 'safeguarding', recognising that support to young people experiencing transition to adulthood can be fragmented, with differing age thresholds for service access and service eligibility and with differing services available for young adults.

Underpinning frameworks and legislation

The Task Group has heard that children's and adults' safeguarding services share a common aim of protecting people from harm, but that these two systems have evolved differently over time and are governed by distinct practice, policy and statutory frameworks. Practice, policy and statutory frameworks underpin multi-agency roles and define safeguarding responsibilities.

² Holmes, D. and Smale, E. (2018) 'Mind the Gap: Transitional Safeguarding – Adolescence to Adulthood.'

³ Ibid

The current duty to promote the welfare of children has been established in law since the Children Act 1989 and 2004. This framework places a general duty on a range of agencies, including local authorities, the police and health services, to promote and safeguard the welfare of children in need in their area by providing a range of services appropriate to those children's needs.⁴ The statutory guidance, Working Together to Safeguard Children 2018, sets out how individuals and organisations should work together to safeguard and promote the welfare of children and young people in accordance with the relevant legislation.⁵ The Task Group has heard that, as of December 2021, there were 2878 children open to statutory services in Brent. Of these children, 353 were on a Child Protection Plan and 352 were Looked After Children.⁶

The current duties and responsibilities regarding care and support for adults has been established in law since the Care Act 2014. It places a general duty on local authorities and health services to provide a system of support to maintain and promote the independence and wellbeing of adults, and a statutory framework to protect adults from neglect and abuse. Making Safeguarding Personal, as set out in the Care Act 2014, aims to identify what action needs to be taken to stop or prevent abuse and neglect in the context of an individual's wellbeing.⁷ The Mental Capacity Act 2005 provides the framework by which an adult's capacity to make specific decisions at a particular point in time is assessed.⁸ The Task Group has heard that, as of September 2021, there were 4015 people in receipt of funded adult social care services in Brent. These are adults who have needs that arise from a physical or mental impairment or illness. There were almost 2,000 reports of abuse or neglect involving adults at risk in 2020/21, and Brent Council's statutory duty to intervene was met in 35% of these cases.⁹

Brent's young people

There are estimated to be around 42,500 young people aged 16-25 in Brent – this group makes up around 13% of the Brent population.¹⁰ It is estimated that 63% of Brent young people aged 16-25 are from Black, Asian and other ethnically diverse groups including 35% from Asian groups and 19% from Black ethnic groups.¹¹ Over two thirds of Brent's pupils (68%) have a first language other than English and, in total, Brent pupils use around 150 different languages.¹²

⁴ Children Act (1989) & Children Act (2004)

⁵ Department for Education (2020), 'Working Together to Safeguarding Children'

⁶ Brent Council, Evidence received at Evidence Session 1

⁷ Care Act (2014)

⁸ Mental Capacity Act (2005)

⁹ Brent Council, Evidence received at Evidence Session 1

¹⁰ Office for National Statistics, (2020), '2019 based mid-year population projections'

¹¹ Office for National Statistics, (2017), '2016 based ethnic group projections'

¹² Brent Council (2021), 'Brent Youth Strategy 2021-2023'

The poverty rate in the borough is significantly higher compared to the overall poverty rate in London. One in three households in Brent live in poverty – compared to one in five in the country as a whole. This is the sixth highest rate in London and the highest in outer London. Poverty rates are particularly high for children and young people in Brent – around 22% of children live in poverty, and this rises to 43% where housing costs are considered.¹³

Despite this relative deprivation, Brent's adolescent children perform well at secondary school. The proportion of 16/17 year olds not in education, employment or training is 1.4%. For London the proportion is 1.8% and nationally it is 2.6%.¹⁴ The number of children and young people with Special Educational Needs and Disabilities (SEND) is relatively high and continuing to rise, with 3.9% of children who attend school having an education, health and care plan (EHC), compared to 3.7% nationally.¹⁵

As of March 2021 Brent had 288 looked after children and young people. This represents 37 out of every 10,000 children and young people in Brent, compared to a rate of 62 out of 10,000 for England. 38.4% of the care population in Brent were aged between 16-18 years old and, as of March 2021, Brent Council was responsible for 415 care leavers (307 of which were aged 18-21 and 108 aged 22-25).¹⁶

A small minority of young people are vulnerable to extra-familial harm such as criminal and sexual exploitation. County lines is one area where criminal exploitation of young people can occur – as of April 2021, 133 individuals in Brent were identified who evidence a link to county lines activity and, of those individuals, the highest proportion were aged 17 to 19 years (35%) and 58% were aged 18 to 25. Moreover, 21.5% of knife crime victims (excluding domestic abuse) are aged 18-25, and 29.5% of knife crime suspects (excluding domestic abuse) are aged 18-25.¹⁷

The case for change

It is important to note upfront both the financial realities facing providers of safeguarding services and the financial case for innovation. The financial constraints placed upon local areas like Brent make it difficult to undertake any work considered non-statutory, and embedding transitional safeguarding would indeed require local services to provide support to young people that are currently not receiving a statutory safeguarding response. However, investing in preventative and recovery-

¹³ Brent Council (2020), 'A Fairer Future: Ending Poverty in Brent'

¹⁴ Brent Council (2021), 'Brent Youth Strategy 2021-2023'

¹⁵ Office for National Statistics (2021), 'Special educational needs in England: January 2021'

¹⁶ Report to the Corporate Parenting Committee (July 2021), 'Annual Corporate Parenting Report April 2020 - March 2021'

¹⁷ Brent Council, Evidence received at Evidence Session 1

oriented work to promote people's safety and wellbeing can play an important role in avoiding the need for specialist and statutory services and criminal justice involvement.

It is noted that extensive research has been undertaken by academics to illustrate why a more fluid and transitional safeguarding approach is needed for young people entering adulthood. The most widely accepted reasons are summarised in the following paragraphs.

Complex safeguarding needs of adolescents

Adolescents may have distinct safeguarding needs, harms and routes to protection. These are often 'contextual', extra-familial and are underpinned by complex social and biological drivers. The Task Group has heard that the risks adolescents face in Brent are often interconnected, and can include sexual abuse, physical and/or emotional abuse, neglect, homelessness, criminal exploitation and substance misuse. A range of risk factors, such as emotional and mental health difficulties, accommodation problems, and not being in education, training or employment can co-exist, and exposure to adversities such as bereavement and strained family relationships can make some more vulnerable to abuse. It is recognised that adolescents who have experienced harm may often require ongoing support beyond the age of 18, either because the harm continues into adulthood or because they need help to recover from the impact of harm.

The Task Group has heard that research on wider social determinants, such as poverty, show a link between deprivation – where families live and their resources – and safety and wellbeing needs. Childhood poverty is argued by some as the biggest factor increasing risk of homelessness, and poverty has been shown to have a strong effect on both physical and mental health. Poverty is also linked to sexual exploitation of adults, and some research suggests a connection between modern slavery (including forced labour, sexual exploitation and trafficking) and homelessness. Multiple studies find that poverty and associated structural factors are consistently linked to multiple crime-related outcomes, and poverty and inequality is also highlighted as a key factor in understanding gang-related crime and disorder. Some groups might face structural disadvantage, as a result of systemic racism, ableism, classism or sexism, and these persist into adulthood and may mean a person is targeted by those seeking to exploit them.¹⁸

Adolescence is also a time of considerable change with physical development and the effects of puberty having emotional and behavioural impacts. The Task Group has heard that some studies into brain development and its effects on behaviour show that

¹⁸ Holmes, D. and Smale, E. (2018) 'Mind the Gap: Transitional Safeguarding – Adolescence to Adulthood.'

some elements of brain growth – such as the development to emotional regulation, social relationships and executive functioning - continue into the 20s. It is argued that the transitional nature of maturation after 18 may therefore require a more nuanced approach to ‘maturity’ and account for young adults’ individual experiences and circumstances in understanding their capacity to take particular decisions.¹⁹

The Task Group is of the view that the interconnectedness of these harms and adversities means that enabling young adults in Brent to be safe may require an integrated system of support that pays attention to childhood and adolescent experiences. It is recognised that there are a variety of ways in which a young person might need help to be safe, including housing support, therapeutic support, financial advice, employment support, legal support, and practical support.

Divergence between children’s and adults’ safeguarding systems and ‘silo working’

Safeguarding systems have developed in accordance with different legislative and policy frameworks and arguably divergent conceptual frameworks. The Task Group has heard that neither system is specifically designed with adolescents’ developmental needs or behaviours in mind, nor do existing approaches to safeguarding take into account evidence that the transition period for adopting adult social roles and responsibilities extends into the twenties. This can lead to what is termed as ‘silo working’ – where services work in close vicinity but independently from each other.

In relation to children, safeguarding duties aim to promote children’s upbringing and their welfare (rather than wellbeing). The Task Group recognises that the role of parents and the familial context arguably frames children’s safeguarding practice, because children are broadly viewed as lacking the full capacity to make decisions for themselves. A primary driver in children’s safeguarding is considered to be protection from harm and removing or mitigating risk - children fall within the scope of safeguarding duties if the local authority has ‘reasonable cause to suspect that a child who lives, or is found, in their area is suffering, or is likely to suffer, significant harm’.²⁰

In relation to safeguarding adults, the Making Safeguarding Personal agenda aims to identify what action needs to be taken to stop or prevent abuse and neglect in the context of an individual’s wellbeing. The Task Group has heard that this approach is based on an understanding of ‘maturity’, associated with adult roles and responsibilities and capacity to make decisions. The Mental Capacity Act 2005 provides the framework by which an adult’s capacity to make specific decisions at a particular point in time is assessed. In terms of eligibility, the safeguarding duties apply to an adult who ‘has needs for care and support (whether or not the local authority is

¹⁹ Ibid

²⁰ Children Act (1989) & Children Act (2004)

meeting any of those needs) and; is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect'.²¹

The Task Group recognises that this divergence presents some challenges in terms of providing a fluid transitional response to safeguarding as young people enter adulthood in Brent, as the criteria by which someone is deemed to require a safeguarding response can change significantly upon reaching their 18th birthday. Consent provides another area of complexity; a child's consent is not required to initiate a safeguarding intervention, whereas consent is broadly considered essential before making a safeguarding referral should an adult be deemed to have capacity.

Differing legal and statutory thresholds

The Task Group has heard that young people in Brent transitioning from childhood to adulthood can find it difficult to access services. Older adolescents and young adults can fall through the gaps between children's and adults' services, often because they do not meet eligibility criteria for care and support from adult services (nor therefore for adult safeguarding), or they fall out of contact with services. This may exacerbate harm in adulthood, potentially leading to poorer outcomes across their lifespan and increasing the likelihood of specialist and statutory interventions in later life.

Whilst children in care in Brent are now entitled to support until the age of 25, those adolescents who have experienced high levels of trauma and harm but are not in care do not automatically have the same entitlements. Young people entering adulthood can fall out of contact with services or disengage with them for a range of reasons – often because services are not as flexible or responsive to adolescents' needs as they could be.

Importantly, the Task Group recognises that young people in Brent can experience a 'cliff-edge' due to different thresholds for access to services. For example, adolescents entering adulthood often do not meet adult mental health criteria, and young people with moderate special educational needs who received support while at school do not necessarily meet eligibility criteria for care and support from adults' services. The criteria by which a person is eligible for safeguarding support can therefore be very different for older adolescents and young adults.

²¹ Care Act (2014)

Recommendation 1: It is recommended that Brent Council identifies transitional safeguarding as a whole council priority.

Increased pressure on local authorities and partners to respond to complex risks and harms point to the need to consider a new way of working to safeguard young people more effectively. The Task Group believes that providing more effective and fluid support for young people as they enter adulthood not only supports their safety and wellbeing, but may also reduce the need for specialist and statutory services and criminal justice involvement.

Brent Community and Wellbeing Scrutiny Committee should be updated on the progress of this recommendation and seek assurance that the development of transitional safeguarding is considered an organisational priority.

Recommendation 2: It is recommended that Brent Council considers developing a council-wide approach to transitional safeguarding which is evidence-informed, participative and considers equality, culture, diversity and inclusivity.

It is clear that some young people may fall through the gap between children's and adults' services as thresholds for support are not aligned or they fall out of contact with services. The Task Group believes that opportunities for developing multi-agency and integrated models that can better enable a transitional approach to safeguarding should continue to be explored, recognising that the interconnectedness of harms and adversities requires a highly integrated and consistent system of support.

The council-wide approach to transitional safeguarding should be informed by recommendations 3-5. Brent Community and Wellbeing Scrutiny Committee should be updated on the progress of this recommendation and seek assurance that work plans across Brent actively consider and address transitional safeguarding.

Good practice

The Task Group believes that the evidence therefore points to a need to consider a new way of working in Brent in which existing safeguarding systems and services for children and adults become more aligned, more fluid and more responsive to the needs of young people. Working this way includes seeking to prevent harm for this cohort of young people, protecting them where harm is occurring and also recognising and responding in ways that can help them recover from the impact of harm. As such,

it is a multi-agency issue dependent on collaboration and connection between agencies, services and with communities.

Transitional safeguarding is not a prescribed model. It is a joined-up approach to policy and practice that is being developed and applied in different ways according to local circumstances. There are a number of areas that localities, including Brent, are exploring when considering how to strengthen their local safeguarding response to adolescents and young adults, as detailed in the following paragraphs.

Good practice within adults' safeguarding

The Task Group believes that there are many positive elements to safeguarding adults that might be usefully drawn into adolescent safeguarding practice. It is felt that doing so may not only create smoother transition to adulthood for young people in Brent who will continue to require support to be safe once they are adults, but might also ensure that young people's emerging independence and autonomy is more effectively promoted.

For example, the Care Act 2014 sets out the following six key principles that underpin all adult safeguarding work. The Task Group feels that these principles are arguably equally applicable to the safeguarding of adolescents, particularly older adolescents:

- Empowerment: People being supported and encouraged to make their own decisions and informed consent.
- Prevention: It is better to take action before harm occurs.
- Proportionality: The least intrusive response appropriate to the risk presented.
- Protection: Support and representation for those in greatest need.
- Partnership: Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- Accountability: Accountability and transparency in safeguarding practice.

Making Safeguarding Personal is a person-centred and rights-based approach to adult safeguarding, which became part of the formal guidance under the Care Act 2014. It is an approach to safeguarding that aims to ensure that adults at risk are fully engaged and consulted throughout an intervention and that their wishes and views are central to the final outcomes.²² The Task Group feels that understanding participative approaches within adults' safeguarding and applying this understanding to transitional safeguarding practice could go some way to improving young people's experience of services in Brent.

²² Ibid

Good practice within children's safeguarding

The Task Group feels that, in turn, there are elements of children and adolescent safeguarding that might prove useful to those seeking to ensure young adults in Brent facing risk are supported most effectively. For example, the Contextual Safeguarding framework and learning from those local areas, like Brent, which have embedded it into policy and practice offers key messages and practical tools for safeguarding young people more effectively beyond the age of 18 years.

Contextual safeguarding may provide a framework for Brent to develop a transitional safeguarding approach that engages with extra-familial risks in adolescence. It may be useful as it recognises that many young people's needs cannot necessarily be addressed by traditional social work interventions, and focusing on the need to assess and intervene with extra-familial contexts and relationships in order to safeguard young people during adolescence. It also encourages an expansive understanding of who constitutes a safeguarding partner – with local businesses, stewards of public spaces and communities playing a key role alongside statutory and voluntary sector agencies.²³

Examples of innovation

The Task Group recognises that transitional safeguarding is being developed and applied in different ways according to local circumstances, and elements of a transitional safeguarding approach can be seen across agencies and services working with young people. For example, in some local areas the focus is on extending the support available to young people experiencing harm in their communities, for others there is a drive to develop services for young adults to prevent them developing longer-term care and support needs.

Newcastle - Sexual Exploitation Hub

This is a multi-agency service that supports both child and adult victims of sexual exploitation and modern day slavery. The service was initially commissioned by the police in partnership with the local authority, in recognition of the way perpetrators were targeting individuals regardless of age. The service works with people where there are identified risks and ongoing concerns around grooming, coercion and control.

Key features of the service include:

²³ Firmin C, Horan J, Holmes D & Hopper G (2019), 'Safeguarding during adolescence – the relationship between Contextual Safeguarding, Complex Safeguarding and Transitional Safeguarding'

- Enables young adults to make sound choices and negotiate risks safely, with the team routinely using the Mental Capacity Act 2005 to assess adolescents' capacity to make safe decisions
- Outcomes-focused and with no upper age limit for the young people being supported
- Work is not time limited and practitioners are able to develop an in-depth understanding of the nature of the risks and needs experienced by adolescents
- Referrals into the service are made via a transition protocol across different services²⁴

Metropolitan Police – DIVERT programme

DIVERT was created to address a gap in statutory provision for young adults who go into police custody. It is a Metropolitan Police Service diversion programme designed to use police custody as a teachable moment to prevent young people aged 18-25 from reoffending, and leading them away from crime into employment, education or training.

Key features of the service include:

- Coaches tailor their approach to the individual's needs, assisting them in a variety of ways; from facilitating access to training, education or employment opportunities to assisting with housing issues or arranging support for mental health or addiction problems
- Coaches continue to work with the young person outside of custody, drawing on a network of partners and agencies for support
- Process continues completely independent of the criminal justice process, and coaches often maintain contact with young people who have received custodial sentences and continue working with them on release²⁵

Brent Council – Supportive Multi-Agency Response Team (SMART)

Brent Council's SMART service supports adults who experience multiple and intersecting vulnerabilities but who do not meet statutory criteria for social care interventions. The SMART service works with people within Brent who often have a cycle of homelessness, mental health admissions, drug and alcohol dependencies and contact with criminal justice and probation services. It is multi-disciplinary, involving social workers with mental health and social care backgrounds, an occupational

²⁴ Department of Health and Social Care (2021), 'Bridging the Gap: transitional safeguarding and the role of social work with adults'

²⁵ Ibid

therapist, drug and alcohol misuse professionals, a housing officer and supportive outreach officers.

Key features of the service include:

- Engages with service users who are difficult to reach and do not meet eligibility for social care interventions
- Enables a collaborative approach in which the person being supported and those providing support work together to determine an outcome that draws on the adult's strengths and goals
- Attention is given to developing and strengthening the person's support network
- Partnership working with a range of agencies and services working with vulnerable adults to ensure integrated and tailored support

The Task Group is of the view that lessons and learning can be taken from local areas that are adopting a more fluid transitional safeguarding approach and from other services and parts of the wider system where transitional approaches are more embedded. The progress of these local areas and other services and parts of the wider system can be drawn upon when considering how to strengthen Brent's transitional safeguarding approach.

Recommendation 3: It is recommended that Brent Council ensures that young people are active partners in the development of its transitional safeguarding approach.

The Task Group believes that transitional safeguarding should be a participative, user-led approach. This means adopting a collaborative approach; respecting young people's expertise and enabling them to coproduce solutions and support rather than being treated as a passive recipient of support. Services should be responsive to the specific needs of the individual young person and as such should to be flexible, integrated and multi-agency. This user involvement will support the development of effective safeguarding practice, informed by young people whose self-confidence, self-esteem and resilience can be developed through that involvement.

Brent Community and Wellbeing Scrutiny Committee should be updated on the progress of this recommendation and seek assurance that young people are active partners in the development of transitional safeguarding.

Development of transitional safeguarding in Brent

The Task Group notes that change must be considered within the context of each local authority's setting. For some local authorities, there may be a number of blocks and barriers to developing transitional safeguarding. For example, the financial constraints facing local areas like Brent make it difficult to undertake any work considered non-statutory. It is also recognised that the impact of the Covid-19 pandemic may have slowed progress in this area as emergency and recovery responses were rightly prioritised. The development of Brent's approach to transitional safeguarding should therefore be explored in this context. Whilst its development is at an early stage, there are a number of key forums where transitional safeguarding work is being undertaken.

Brent's Multi-Agency Risk Assessment Conferences (MARAC) is a structure where professionals from agencies share information on cases of vulnerable and high-risk individuals whose personal safety is a concern. The meeting creates a risk management plan to offer immediate support. The aim of the process is to address the safety and protection of an individual and to review and coordinate the case and case management plan. Examples of vulnerable individuals that can be referred to the panel are those who are victims of domestic abuse, victims of hate crimes, at risk of fire related incidents, at risk of financial abuse/fraud and at risk of homelessness/or have difficulties maintaining their property. The MARAC evidences information sharing between a range of agencies and includes representatives from the local police, health, child protection, housing practitioners, domestic violence advisors and other specialists. Young people are considered who are under the age of 18, as well young adults aged 18 and over.

The Exploitation, Violence and Vulnerability Panel (EVVP) is another forum in which transitional safeguarding is being developed. Alongside overseeing interventions for children, young people and adults at risk of exploitation, the panel provides a coordinated, visible and accountable partnership response for managing those in the Violence and Vulnerability Programme cohort. The Violence and Vulnerability Programme focuses on supporting vulnerable young people and reducing reoffending and serious youth violence through a coordinated, multi-agency and intelligence led approach. As of May 2021, the programme was supporting 130 clients aged between 17-25. This includes gang members, persistent offenders, habitual weapons (knife/gun) carriers, domestic abuse perpetrators and those at the cusp of offending behaviour.²⁶

The Contextual Safeguarding Strategic Group progresses the contextual safeguarding agenda in Brent. It works to ensure that policy and practice responds more effectively to harms faced by children and young people outside the family of home. The main extra-familial risks to children and young people in Brent are recognised to include

²⁶ Brent Council, Evidence received at Evidence Session 1

youth violence, gang involvement, and child exploitation, including sexual exploitation and criminal exploitation such as county lines. The Task Group is encouraged to learn that the Transitional Safeguarding sub-group of the Contextual Safeguarding Strategic Group brings together representatives from Brent Council's Children and Young People, Community Wellbeing and Regeneration and Environment services to look at the ways in which the local authority can develop its transitional safeguarding approach.

The Transitional Safeguarding sub-group's current work is focused on transitions for children leaving care. As a result of joint-working, a more collaborative approach was recently piloted between the Leaving Care and Adult Safeguarding teams which sought to explore the ways that vulnerable young people who are leaving care are supported where non-statutory interventions are needed. The majority of the cases identified did not meet eligibility criteria for an adult safeguarding intervention, where there is no statutory duty to support these young people. The Task Group is encouraged by the support received across services for the pilot and the expectation that those involved learn from one another and work together to consider what transitional safeguarding may look like in Brent. A learning event took place in February 2021 to discuss the challenges and opportunities emerging from the pilot, as well as the opportunities to reimagine systems to support for this cohort.

Case Study: Piloting transitional safeguarding approaches for young people at risk of sexual exploitation in Brent

Freya is an 18 year old care leaver who is at high risk of sexual exploitation and is very vulnerable with a history of abuse and neglect in her life. Freya has a history of going missing and it has been reported that she both sends and receives messages from men she has met online, meets with them and is offered drugs and alcohol. Freya is frequently reported missing together with other young people known to CYP.

Concerns escalated around Freya's eighteenth birthday and these were reported through the Integrated Risk Management Meeting, leading to a complex strategy meeting to ensure that all the professionals involved, including the Adult Safeguarding Team and Police representatives, share information and intelligence from partner police services in the various locations Freya is known to have visited.

Following this, Adult Safeguarding and the Leaving Care Personal Advisor carried out a joint Mental Capacity Act assessment. As this assessment concluded that she does have capacity, professional focus is currently on developing an adult safeguarding risk management plan, drawing on Adult Safeguarding expertise in this area.

Four sessions of multi-agency training on transitional safeguarding were conducted in 2021 in partnership with Research in Practice. The objectives of the training were to raise awareness of transitional safeguarding, communicate messages from Safeguarding Adult Reviews and to understand the tensions, blocks and barriers to developing a transitional safeguarding approach. The Task Group is pleased that attendees included practitioners from the Council's Community Wellbeing and Children and Young People services alongside health partners, commissioned services, schools and local charities. In addition, Research in Practice were invited to speak to the Council's Adult Social Care team about its research and encourage attendees to share their expertise and explore the ways in which they could develop their safeguarding practice.

The Task Group is encouraged to hear that Brent Council commissions a range of interventions available to children and young people in Brent to the age of 25. St Giles Trust have been commissioned to provide a Gangs Intervention Programme (which falls under the EVVP) to challenge and work with those involved with or on the periphery of gangs to change their behaviour and take responsibility for their actions. There is a dedicated Gangs Mentor based within Brent Council's Youth Offending Service Team to provide support and interventions for young people working with the Youth Offending Service, Early Help, and Social Care teams. AIR Network have been commissioned to deliver a mentoring, sports, and wellbeing programme and have provided support to offenders on the Violence and Vulnerability Programme. AIR Network engages with offenders prior and during release from prison and provides support in areas such as housing, education, training, employment, mental health and drug and alcohol abuse.

Another example of a commissioned intervention available to children and young people in Brent to the age of 25 is the Embedded Youth Violence Hospital Project delivered by St Giles Trust. This project aims to improve the identification and engagement of young people who present at Northwick Park Hospital as a victim of serious youth violence. They also deliver training and professional development programmes to professionals who have contact with young people. Westminster Drug Project (WDP) is commissioned through Brent Council's Public Health service to provide support services to young people and adults in Brent. For example, the Mental Health Outreach Project provides support for those with either diagnosed and non-diagnosed mental health conditions to reduce re-offending rates. It also works to focus on cohorts not yet known to statutory services, increasing earlier intervention and identification.

Global Thinking's Young Women's Diversionary Project delivers a bespoke service for young women affected by gangs, criminal exploitation and county lines. It aims to ensure that young women are able to access help and are free from harm, abuse and exploitation. The project also delivers training days for professionals to help increase

the awareness of how young women can be affected by threats and to help professionals better identify risk indicators for early intervention. Brent Council also commissions Advance Minerva Wrap Around which provides specialist support to women and girls over 15, with complex multiple needs who have committed crime and are at risk of re-offending. The service is designed to be a multi-agency response to women in contact with the criminal justice system and is offered in women only hubs and two regional women's centres.

Brent's Probation Services is involved in the transition of young people from the Youth Offending Service to Probation Services and is a member of key safeguarding forums such as EVVP and Brent MARAC. Young people are usually transferred from the Youth Offending Service to Probation Services at the age of 18. The Task Group heard that the Transitions to Adulthood programme provides a community-based holistic service for 17 year olds transitioning from the Youth Offending Service to adult probation, informed by an understanding of maturity rather than age in order to reduce reoffending, improve mental health and support young adults to make positive life choices. Pilots are also underway in Brent to provide trauma-informed training for staff to assess a young person's capacity to make informed decisions and to identify care leavers and care experienced offenders to ensure risk assessments and sentence plans take this experience into account.

Case Study: Transitional support from the Youth Offending Service in Brent

A Crown Court provided positive feedback about interventions for two young people age 19. Their Youth Offending Service worker continued to work with them post-18, funded by Brent Council Covid-19 pressures funding. due to the progress made, on returning to Court to seek a variation the Judge decided to revoke both orders. The young people were asked what made the biggest difference. They responded:

"Receiving support in applying for courses, preventing me from re-offending and doing stupid stuff."

"Engaging in sessions addressing my offence and the impact it had on victims."

"Discussions that made me think hard about my actions and the consequences."

Brent's schools also undertake considerable work to support young people moving into adulthood. In particular, schools play an important role in identifying young people that may experience risks and harm. The Task Group heard that many schools have close working relationships with a range of agencies and services that work with young people, such as the local police, mental health services, statutory children's and adults'

safeguarding services and commissioned services, and work alongside these organisations to ensure safeguarding support is in place. This provides a platform by which young people transitioning into adulthood can be supported regardless of whether they fit into adult safeguarding statutory criteria.

Local health commissioners such as North West London Clinical Commissioning Group and Central and North West London NHS Foundation Trust play an important role in supporting young people as they transition into adulthood, and provide another area in which transitional safeguarding practice is being developed. Local health commissioners are seeking to ensure that commissioned services are afforded flexibility in order to support people across this stage of development, and to incorporate co-productive principles within local commissioning approaches to ensure those young people that receive care are involved in the planning, development and delivery of the care they receive. They are also uniquely placed to ensure robust local needs analysis, so that young people's needs are understood and incorporated into service planning and reflected in the market.

The Task Group is encouraged to learn that the need to improve transitions from Children and Adolescent Mental Health (CAMHs) to Adult Mental Health (AMHs) services was recognised in the NHS Long Term Plan. In response, Central and North West London NHS Foundation Trust has introduced a new model of mental healthcare designed for young adults aged 16-25 years. Specific features of the model include dedicated support for young adults moving from CAMHs to AMHs, continued support for young adults who have experienced adversities such as youth violence and in-reach services where young people are based, for example universities, colleges or local hubs for those not in employment or higher education. It also includes Multi-agency Young Adult Triage and Partnership meetings with clinical assistance for referrers to develop management plans and young adult focused therapies and service adaptations.²⁷

Whilst recognising that the development of transitional safeguarding in Brent is at an early stage, the Task Group is encouraged by the progress made so far. The Task Group feels that the transitional safeguarding agenda must continue to be progressed with clear, credible and explicitly owned local leadership, an expanded definition of partnership working, meaningful engagement with communities and active knowledge and skills exchange.

²⁷ Central and North West London NHS Foundation Trust (2021), 'Improving Young Adult Mental Health in North West London – A new model of care is ready for local implementation'

Recommendation 4: It is recommended that Brent Council considers how it can enhance its support to young people within the transitional safeguarding cohort with needs in education, training and employment (ETE), financial literacy and housing.

The risks young people face are often inter-connected, and a range of risk factors, such as financial difficulties, housing problems, and not being in education, training or employment can co-exist. Strict service criteria or thresholds can generate confusion for young people as the system is complex and it can be difficult for them to work out what support they are able to access. The Task Group believes that some young people therefore need multi-agency support at a more intensive level in order to navigate the complexities of housing, education, training and employment (ETE), finances and further agency support. Brent Council's SMART team offers an example of good practice within adult social care which can be learned from across services to support young people transitioning to adulthood.

Brent Community and Wellbeing Scrutiny Committee should be updated on the progress of this recommendation and seek assurance that there are measures in place to demonstrate practice change.

Recommendation 5: It is recommended that Brent Council promotes transitional safeguarding across safeguarding agencies and services working directly with young people by:

- a. Ensuring that Brent’s strategic partnerships for children’s and adults’ safeguarding and Safer Brent Partnership offer multi-agency training for officers, local commissioners and service providers to raise awareness of transitional safeguarding.**
- b. Commissioning specialist training for elected and co-opted members to raise awareness of transitional safeguarding and empower them to identify gaps and areas for improvement in local safeguarding practice.**

The Task Group believes that the development of transitional safeguarding requires strong, collaborative leadership to enable creative and coherent practice and services for local residents. It is important that officers, local commissioners and service providers develop their knowledge and understanding of transitional safeguarding issues within the local area, share their expertise and support other professionals to develop their practice. The Task Group also sees elected members as well placed to lead across boundaries with their experience of working across services, organisations and sectors, as well as their unique knowledge of the communities they represent.

Brent Community and Wellbeing Scrutiny Committee should be updated on the progress of this recommendation and seek assurance that training is well attended and informs the development of transitional safeguarding across agencies.

Appendices

Appendix A Participants

The Task Group would like to thank the following participants who contributed to the report and/or took part in evidence sessions held between December 2021 and January 2022:

- Dez Holmes – Director, Research in Practice
- Georgina Diba - Head of Adult Safeguarding , Brent Council

- Sonya Kalyniak - Head of Safeguarding and Quality Assurance, Children and Young People, Brent Council
- Natasha Langleben - Team Manager (LAC and Permanency), Children and Young People, Brent Council
- Jyoti Morar - Deputy Team Manager (Integration and Improved Outcomes), Children and Young People, Brent Council
- Rebecca Byrne - Head of Learning Disability and Mental Health, Brent Council
- Colin Wilderspin – Head of Community Protection, Brent Council
- Andy Brown – Head of Substance Misuse, Brent Council
- Marcus Hanvey - Acting Inspector, Gangs and Project Horizon, North West London Basic Command Unit
- Kathryn Hunt - Head of Service, Brent Prison and Probation Service
- Hermann Farrington - Headteacher, The Village School
- Trish Davies - CAHMS Manager, Central and North West London NHS Foundation Trust
- Claudia Brown – Operational Director Adult Social Care, Brent Council
- Nadeem Janjua - Hospital Embedded Team Manager, St Giles Trust
- Lance Findlater - St Giles SOS Project Caseworker, St Giles Trust
- Sam Amiryan - Coordinator, Air Network
- Dr Arlene Boroda - Designated Doctor for Safeguarding Children, Child Death and Children Looked After, North West London Clinical Commissioning Group
- Gail Tolley – Strategic Director Children and Young People, Brent Council
- Phil Porter – Strategic Director Community and Wellbeing, Brent Council
- Philippa Galligan – Borough Director, Central and North West London NHS Foundation Trust
- Tiffany Adonis-French – Head of Adult Services (Complex Care), Brent Council
- Councillor Harbi Farah - Lead Member for Adult Social Care, Brent Council
- Councillor Margaret McLennan – Deputy Leader and Lead Member for Children's Safeguarding, Early Help and Social Care

The Task Group has been impressed by the knowledge and insight of all stakeholders and expert witnesses involved, and thanks them for their contribution.

Appendix B

Evidence Sessions

	Themes and Areas for Discussion
Evidence Session 1 9 December 2021	Understanding transitional safeguarding Practice of transitional safeguarding Evolution of transitional safeguarding practice nationally Examples of good practice and learning from other boroughs and/or nationally
Evidence Session 2 14 December 2021	Transitional safeguarding development work undertaken in Brent Role of multi-agency working in developing transitional safeguarding practice Experience of young people and families who may require transitional support
Evidence Session 3 11 January 2022	Development of transitional safeguarding practice going forward Lessons learned from both good practice and where things could be improved and from other services/wider parts of the system

Appendix C

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	Cabinet 11 th April 2022
	Report from the GP Access Scrutiny Task Group
Executive Response to the GP Access Task Group Report of the Community and Wellbeing Scrutiny Committee	

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
Appendices:	Two Appendix 1: Executive Response to the GP Access Task Group Report of the Community and Wellbeing Scrutiny Committee Appendix 2: GP Access Task Group Report
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Craig Player Scrutiny Officer, Strategy and Partnerships 020 8937 1898 craig.player@brent.gov.uk Meenara Islam Strategic Partnership Manager, Strategy and Partnerships 020 8937 1479 meenara.islam@brent.gov.uk Lorna Hughes Head of Strategy and Partnerships 020 8937 5068 lorna.hughes@brent.gov.uk

Purpose of the Report

- 1.1 The purpose of this report is to present the Cabinet's Executive Response to the GP Access Task Group scrutiny report and recommendations of the

Community and Wellbeing Scrutiny Committee for agreement. The scrutiny report was agreed at the meeting of the scrutiny committee on 22 February 2022. The Cabinet's Executive response is at Appendix 1 to this report.

2 Recommendation(s)

- 2.1 That the Executive response to the GP Access Task Group scrutiny report and recommendations of the Community and Wellbeing Scrutiny Committee at its meeting on 22 February 2022, be agreed.

3 Detail

- 3.1 The Community and Wellbeing Scrutiny Committee can commission evidence based reviews of a policy area or function of the local authority, which are led by non-executive members. The GP Access Task Group was established to review the accessibility of general practice in Brent since the end of lockdown in March 2021.
- 3.2 It was considered timely in terms of the pressures on primary care and the transformations underway in general practice and the wider health economy, some of which have been accelerated in response to the Covid-19 pandemic. Importantly, the Task Group was set up in response to residents' concern about the ease with which they are able to access their local GP practice.
- 3.3 The Task Group was asked to produce a written report with recommendations to Brent Council's Cabinet and/or local NHS organisations. The Task Group's interim report was presented to the Community and Wellbeing Scrutiny Committee on 15 November 2021 which included early feedback on their findings. The Task Group's final recommendations and findings were presented to the Community and Wellbeing Scrutiny Committee on 22 February 2022 and it was agreed that the final report would be presented to Cabinet. The final report is set out in detail at Appendix 2.
- 3.4 In accordance with Part 4 of the Brent Council Constitution, (terms of reference for council committees and subcommittees), Brent Council scrutiny committees may make recommendations to full Council or the Cabinet with respect to any functions which are the responsibility of the executive or of any functions which are not the responsibility of the executive, or on matters which affect the borough or its inhabitants. The Community and Wellbeing Scrutiny Committee may also make recommendations to the relevant NHS bodies or relevant health service providers or Full Council.
- 3.5 The Cabinet is being asked to consider its Executive response to the GP Access Task Group scrutiny report and recommendations of the Community and Wellbeing Scrutiny Committee recommendations and either agree, reject or agree as amended, the scrutiny recommendations made, as set out in the draft Executive response attached at Appendix 1 to this report.
- 3.6 Scrutiny committees may not make executive decisions. Scrutiny recommendations therefore require consideration and decision by the

appropriate decision maker; usually Cabinet, but also Full Council for policy and budgetary decisions and the NHS where it is the decision maker, in accordance with the terms of reference for scrutiny committees, set out in the Council Constitution.

- 3.7 The scrutiny committee will be notified of the executive decisions made in respect to the scrutiny recommendations and may track the implementation of the Cabinet decisions. This enables the scrutiny committee to track whether their recommendations have been agreed, what actually was agreed (if different) and review any outcomes arising from the scrutiny recommendations, for example, service improvements, value for money savings and outcomes for residents.

4 Financial Implications

- 4.1 It is possible that if a recommendation was accepted and implemented that it may have financial implications for the local authority and/or local NHS organisations. Any financial implications will be reviewed by officers and reported to Cabinet for their consideration and approval.

5 Legal Implications

- 5.1 Section 9F, Part 2 of the Local Government Act 2000, *overview and scrutiny committees: functions*, requires that Executive Arrangements by a local authority must ensure that its overview and scrutiny committees have the power to make reports or recommendations to the authority or the executive with respect to the discharge of any functions which are or are not the responsibility of the executive, or on matters which affect the authority's area or the inhabitants of that area.
- 5.2 Section 9Fe, *duty of authority or executive to respond to overview and scrutiny committee*, requires that the authority or executive;-
- (a) consider the report or recommendations,
 - (b) respond to the overview and scrutiny committee indicating what (if any) action the authority, or the executive, proposes to take,
 - (c) if the overview and scrutiny committee has published the report or recommendations, publish the response, within two months beginning with the date on which the authority or executive received the report or recommendations.

6 Equality Implications

- 6.1 Under Section 149 of the Equality Act 2010, the Council has a duty when exercising their functions to have 'due regard' to the need to:
- a) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act;
 - b) advance equality of opportunity; and
 - c) foster good relations between those who share a "protected characteristic" and those who do not.

- 6.2 This is the Public Sector Equality Duty (PSED). The 'protected characteristics' are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, sex, and sexual orientation.

7 Consultation with Ward Members and Stakeholders

- 7.1 The relevant Cabinet members and Council directorates have been consulted in drawing up this report.

Report sign off:

Shazia Hussain

Assistant Chief Executive

Executive Response to the Community and Wellbeing Scrutiny Committee

11th April 2022

On 22 February 2022, the Community and Wellbeing Scrutiny Committee agreed recommendations to the Cabinet after considering the GP Access Task Group's final report. The Cabinet's Executive Response and decisions against those recommendations are provided below.

Please note that the Executive Response outlined below would require delivery through Brent Integrated Care Partnership (ICP) and North West London Integrated Care System (ICS) rather than directly through the Council. This was agreed and recognised through the Health & Wellbeing Board.

Recommendation 1

Brent Council's Cabinet works with NWL ICS to ensure fair funding for local health services.

The Task Group recognises the high levels of need and demand in Brent. It is recommended that Brent Council's Cabinet works with NWL ICS to ensure fair funding for local health services to meet this need.

Executive Response:

Representations have already been made through Brent ICP to North West London ICS for a fair funding settlement across a range of health services.

Specific analysis at North West London level has shown significant underfunding within mental health services, and work is underway to redress that balance through any new or additional funding allocations to health providers over the coming years.

There is also additional primary care investment of £7million across North West London recurrent for 4 years to improve patient care, £2.4million for diabetes and serious mental illness, and £2million for GP winter funding for Urgent Treatment Centre redirection and GP access.

Community service budgets have also received recurrent (4 year) Ageing Well Funding of £1.5m, plus additional funding for community mental health services

Brent ICP will seek further data from North West London ICS across other health services, recognising not just population size but also the needs of the population, and will continue to seek investment for additional funding to address high priority needs within the borough

Decision: Agreed

Actions:

- i). Brent ICP to formally request data from North West London ICS on funding allocations by need

Recommendation 2

Brent PCNs demonstrate a clear career development pathway for health care professionals in order to make best use of professional practice staff that enables greater capacity and more appropriate use of GPs. Brent PCNs should report progress against the development pathway to Brent ICP.

The Task Group has found that many GP appointments, such as for minor illnesses and injury, could be dealt with by a health professional. It is recommended that Brent PCNs ensure each GP practice has a clear development pathway in place for health care professionals with a view to utilising their full expertise, allowing them to deal with more routine appointments and increase the capacity of GPs. PCNs should ensure that the increased role of health care professionals in delivering GP services is communicated to patients.

Executive Response:

There is an extensive existing training programme for staff within primary care.

Brent Primary Care Networks (PCNs) have access to a range of roles to support GPs in undertaking routine activities and free up capacity, including Additional Roles Reimbursement Scheme (ARRS) roles and social prescribing link workers, among others.

However, Brent ICP have identified workforce recruitment, training and development as a major blockage to delivery of the borough priorities across a range of health professionals at GP practice level. Work is underway to develop a dedicated whole system workforce strategy and delivery plan at borough level, with a dedicated programme manager to address these challenges.

In addition, Brent ICP Executive have agreed to take forward a programme of work around the establishment of geographically based locality teams, which will bring together community health and social care teams to provide wrap-around support to primary care. Recruitment to the programme lead role is underway.

Decision: Agreed

Actions:

- i). Recruitment of dedicated workforce and locality team programme managers.

Recommendation 3

Brent PCNs adopt a GP access and treatment standard that all GP practices sign up to and are accountable to. The standard should describe what services are available and what patients can expect from them. All patient participation

groups (PPGs) should be involved in setting this standard, and PPGs should be regularly updated on the performance of the standard.

The Task Group has found that the ease with which patients access GP services varies across practices, and their experience of services varies too. An access and treatment standard will ensure that Brent residents experience consistently high levels of service in access and treatment when they need them, and in a way that suits their needs. The Brent standard should build on best practice of other local areas, and Brent Council should promote the standard across the West London Alliance.

The Task Group has identified the following access and treatment standards based on the experience of patients, which should be used a minimum:

- i. Reception and telephone access for all patient needs during opening hours*
- ii. Agreed arrangements for evening and weekend access communicated to patients*
- iii. Reception telephone answered within a maximum time frame or call back facility available (subject to the move to cloud based telephony systems)*
- iv. Appointment and prescription requests addressed within a maximum time frame – regardless of whether request is made via telephone, online or in person*
- v. Patients make one call only to make an appointment during core hours (subject to the move to cloud based telephony systems)*
- vi. Appropriately trained clinicians should be involved in all stages of the triage process*
- vii. Patients updated on all further action taken in respect of requests, appointments and/or treatments where these are carried out by the practice*
- viii. Referrals to secondary care are clinically appropriate and in accordance with any agreed clinical pathways and referral protocols – patients are updated at each stage of the referral*
- ix. For rapid access - conversation with registered clinician within fixed period in advance; emergency and urgent needs triaged within four hours. Practices clearly set out the process for routine, rapid and emergency access by agreement with NHS 111 and PPGs – this should be made clear on practice websites*
- x. Flexible appointment types should be offered and booked in line with clinical need and patient's preference, including face-to-face, telephone, remote/digital and home visits – the range of appointment types should be made clear on practice websites*
- xi. Bookings available to patients up to four weeks in advance for routine care and patients are made aware of process for cancelling and rebooking routine care appointments*
- xii. Registration at any GP practice, where this is possible with no requirement for address, immigration status, identification or NHS number – with digital and face-to-face registration options for new patients*
- xiii. Patients have their digital literacy and access to digital devices recorded on their patient file and taken into account when treatment is given*
- xiv. Consent for digital communication and services and recorded in patient file*
- xv. Guidance on online consultation service and digital communication communicated on practice website in easy to use language*

- xvi. *Patients to be able to communicate with GP practice via online consultation system and secure online messaging*
- xvii. *Each practice works towards developing consultant nurse practitioner and prescriber skills*
- xviii. *Non-clinical staff should be available at each GP practice e.g. social prescribers – availability made clear on practice websites*
- xix. *Treatment plans for all patient care agreed with and shared with patients*
- xx. *Prescription medicines issued where clinically effective and cost-effective, ensuring patients are engaged in the process at each stage by their clinical team*
- xxi. *Newly registered patients should receive information on GP practice and NHS England complaints procedures, as well as local complaints and advocacy services*

Executive Response:

There has been extensive work undertaken with the 51 GP practices to improve access with a range of partners to map and address access needs across the population. It is recognised that there have been significant changes to the way that primary care is run, especially during the Covid-19 pandemic, with new systems and processes initiated including around online appointments and virtual wards as well as the more traditional model of consultation.

Brent ICP Executive recognise the importance of GP access, and have established a dedicated Executive group focussed on PCN development and GP practice variation. It is proposed that the development of GP access standards becomes a core component of this Executive group going forwards, with detailed work to co-develop these standards

These standards will be co-developed with partners across North West London, and will recognise that where digital access is a barrier, that there are other means of accessing appointments.

It is proposed that there is a new digital access platform developed which will improve accessibility, including voice to text messaging, interpretation and a more user friendly on line consultation service

Decision: Agreed in part – subject to amendments below

- *Referrals to secondary care are clinically appropriate and in accordance with any agreed clinical pathways and referral protocols – patients are updated at each stage of the referral (where practice are in receipt of the information)*
- *For rapid access - conversation with registered clinician within fixed period in advance; emergency and urgent needs triaged within four hours. (routes for emergency and urgent access is through 111 who have capacity to triage calls within the stated hours)*

- Registration at any GP practice, where this is possible with no requirement for **address**, immigration status, identification or NHS number – with digital and face-to-face registration options for new patients (**contractually GP practices are required to ensure patient resides in agreed practice area – exemptions exists for homeless, this is to ensure home visiting requirements are met**)
- Patients to be able to communicate with GP practice via online consultation system and **secure online messaging (functionality for on line messaging is by invitation from GP practice)**
- Each practice works towards developing **consultant** nurse practitioner and prescriber skills – (**consultant nurse practitioner not a known role, nurse's shortage is well known, suggest we work towards each practice having access to and developing Clinical Pharmacists**)

Actions:

- i). Co-develop detailed Access Standards with GP practices, Patient Participation Groups and North West London London for action within 2022/23

Recommendation 4

Brent PCNs widely communicate the GP access and treatment standard and information on patients' rights to access and treatment including registration, appointments and prescriptions.

The Task Group has found that some patients were unaware of their rights to access GP services, the various GP services available to them, the clinical and social teams at a practice and the ways in which they are delivered. It is recommended that Brent PCNs communicate the GP access and treatment standard, as well as information on patients' rights concerning access and treatment including registration, appointments and prescriptions to ensure they have a clear understanding of what to expect from general practice. Brent PCNs should also measure and communicate the delivery of the standard, for example through the annual GP patient survey, practice websites and PPG meetings.

Executive Response:

Significant work has been undertaken through Brent Health Matters and other programmes to improve community awareness of GP access rights. This has included development of communications materials in different languages, the establishment of a dedicated phone line to support with any health and care queries, and also outreach events in different community settings to support GP registration. There is a large pool of volunteers and staff who are available to support people in community settings.

Practices are requested to communicate to patients opening hours, and out of hours' provision, including weekend provision. Audits are undertaken to ensure the contract requirements are being met.

Annual GP patient survey is undertaken by NHS England with limited opportunity to develop questions/ include additional data.

Decision: Agreed in part – remove reference to the annual patient survey

Actions:

- i). Undertake audit of GP practice messaging systems and communications training for front line staff.
- ii). Implement new cloud based telephone service to improve access to general practice, including call re-directions, assessing high demand period and ensuring staffing levels meet demand.
- iii). Continue community based communications support to ensure patients access services and promote key messages

Recommendation 5

Brent PCNs develop an action plan to ensure that patient participation groups (PPGs) are supported to be actively involved in improving GP services. Brent PCNs should report progress against the action plan to Brent ICP and Brent Community and Wellbeing Scrutiny Committee.

The Task Group is keen to ensure that practice PPGs are well resourced, representative of the practice population, have input from relevant health and voluntary professionals and are actively involved in service improvement. Brent PCNs should also set up PCN-wide PPGs that are representative of the geographical area they cover and actively involve patients in designing future service delivery. Brent ICS and Brent Community and Wellbeing Scrutiny Committee should ensure that the action plan is delivered by monitoring the effectiveness of PPGs, and Brent ICS should report to Brent Health and Wellbeing Board on PPG performance. Where appropriate, PPG representatives should be co-opted onto the Community and Wellbeing Scrutiny Committee and/or its Task Groups and consideration should be given to formalising links with Health watch Brent.

Executive Response:

Brent ICP Executive have commissioned consultancy support which will develop proposals for the the involvement of patient representation in the shaping of services locally.

Additional training will also be provided and support to PCNs to develop PCN wide PPG meetings and develop closer links with patient populations locally

Decision: Agreed

Actions:

- i). Provide bespoke training courses for GP practices/PCN level to further develop the PPG and the benefits of patient engagement in service development

Recommendation 6

Brent PCNs demonstrate that the configuration of their services does not disadvantage patients based on where they live.

The Task Group is concerned that the current arrangement of GP services in local areas may disadvantage some patients based on where they live. It is recommended that Brent PCNs consider ensuring that their configuration recognises pre-existing localities such as the five Brent Connects footprints. This should facilitate more geographically accessible services for patients and more effective integrated working between PCNs and statutory health and care partners. PCNs should consult statutory health and care partners on any proposal to change the configuration of a PCN, and if a change is made the rationale for doing so should be communicated to registered practice patients.

Executive Response:

The Brent Health Matters teams will further outreach model to ensure care is provider closer to the patient home. Future models of care will focus on barriers to accessing care, ensuring no patient is left behind. Practices are also adopting this model and working alongside the Brent Health Matters team to deliver services in community settings. We will seek to develop our integrated care model further to provide services to those communities where engagement may be lower.

Links developed with voluntary organisations, charities and faith leaders to be maintained and further develop in addressing health inequalities

Changes in PCN configuration and delivery of place based commissioning models remains our most challenging agenda, which Brent ICP is committed to developing. Patients are at times apprehensive of change and where these changes directly affect patients, these messages would be communicated to patients, where there are no direct changes we would welcome further discussions.

Decision: Agreed

Actions:

- i). Further develop outreach and community based delivery models recommendation(s).
- ii). Further strengthen links with community, voluntary and faith groups in addressing health inequalities in local populations
- iii). PCN changes directly impacting patients communicated to patients.

Recommendation 7

Brent PCNs implement a SMART action plan to reduce the barriers experienced by patients when accessing GP services, with a focus on deprivation, ethnicity, disability and other protected characteristics. Brent PCNs should report progress against the action plan to Brent ICP and Brent Community and Wellbeing Scrutiny Committee.

The Task Group has repeatedly found that some groups of patients experience significant barriers and unequal access to GP services, including patients on persistent low incomes, those with a disability, some older patients, patients whose first language is not English, some children and young people, refugees and asylum seekers and those who cannot access digital technology. It is recommended that a SMART action plan is developed to advance equality of access between people who share a protected characteristic and those who do not (with consideration for the Equality Act 2010), and that the actions identified are incorporated into the access treatment standard.

Executive Response:

Recruiting dedicated borough analysts with deprivation and ethnicity lens to undertake deep dive on barriers to healthcare in local populations. PCN Variation Executive Group to review variation in care within population groups

Focussed support for asylum seekers, homeless, patients whose first language may not be English, including outreach work, working with local community leads. Equality and Quality Impact assessment to form part of service change proposals.

Continue with digital inequalities work stream including providing digital devices and Wi-Fi access to ensure digital inclusion of patient groups

Decision: Agreed

Actions:

- i). Borough level analysis of health inequalities between patient groups, addressing barriers to health (interpreters, written format, digital).
- ii). Further expand digital inclusion agenda and on line training for patients.

Recommendation 8

Brent ICP should work alongside Brent Children's Trust to conduct further research into the experience of children and young people in accessing GP services and take any action as identified.

The Task Group has concern that some parents with young children and children and young people themselves are having difficulty accessing GP services, especially in accessing mental health support and rapid access to primary care for infants and young children with childhood illness. As such, there is an urgent need to quantify the

service offer for children and young people. It is recommended that Brent ICP works alongside Brent Children's Trust to commission necessary expertise to conduct further research on this matter, and that the findings inform an update of the actions identified in the SMART action plan to address the barriers to access and deliver the GP access and treatment standard.

Executive Response:

Work has commenced to review presentation of paediatric cases at acute settings, the lower acuity of these cases highlighted the opportunity to work with Community Pharmacists under the Community Pharmacy Consultation scheme to provide access to health advice on the High Street.

Each of the seven Brent PCNs will provide a GP Access Hub from 1st October 2022 which ensures access for patients from 6.30-8pm on weekdays and 9am to 5pm on Saturdays.

Access to Mental Health Services to children and young people will form a focus of the ICPs plan for the coming financial year with additional mental health team staff employed to work across PCNs and Mental Health providers.

Decision: Agreed

Actions:

- i). Review of demand and capacity access for children and young people. Development of integrated pathways with Community Pharmacy services to improve access to timely advice and intervention.
- ii). Establishment of PCN Access Hubs with dedicated Saturday clinics staffed by multi-disciplinary staff members.
- iii). Review of access to mental health services for children and younger people

Implementation by: Commencement April 2022 to March 2023

Cabinet Member: Councillor Farah – Lead Member for Adult Social Care

Lead Department: Community and Wellbeing

Lead Officer: Phil Porter - Strategic Director of Community and Wellbeing

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‘No One Left Behind’

GP Access in Brent

A Scrutiny Task Group Report

Chair, Councillor Mary Daly

**Brent Community and Wellbeing
Scrutiny Committee**

Members of the Task Group

Councillor Mary Daly (Chair)

Councillor Abdi Aden

Councillor Tony Ethapemi

Councillor Claudia Hector

Councillor Gaynor Lloyd

Councillor Ahmed Shahzad OBE

The task group was set up by members of Brent Council's Community and Wellbeing Scrutiny Committee on 24 March 2021.

Contact:

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Chair's Foreword



Good access to GP services in Brent is central to ensuring that all residents receive the right healthcare, in the right setting, at the right time. Many residents will be aware of the impact that the Covid-19 pandemic has had on general practice, and in particular on the ways in which residents are able to access services.

We recognise the significant pressures the pandemic has placed on general practice, already impacted by rising and ageing populations, an increase in long-term conditions and changing patient expectations. To reduce transmission of Covid-19, general practice implemented predominantly remote consulting via telephone, video or online consultation platforms during the pandemic. This move was largely backed by the public, who understood its necessity in order to protect the health of staff, patients and the public.

Following the end of lockdown in March 2021, a national debate has emerged about whether general practice should return to its pre-pandemic face-to-face model. Some doctors and patients have voiced concern that the system adopted during the pandemic may be preventing some patients from accessing the care they need, and that the pandemic has exacerbated long-term issues and made them more apparent. It was therefore felt that a scrutiny task group would be timely in light of the pressures on general practice during the pandemic, and the various changes that it has brought about.

It is recognised that people will have different views and experiences of general practice, and the Task Group has endeavoured to capture a range of these in its findings and recommendations. The tireless work of GP staff to ensure general practice remained open during the pandemic is acknowledged and, for many patients, their experiences of the care they receive from their GP has continued to be positive. However, the Task Group has come away with a sense that, even in these challenging circumstances, there are things that can be done across Brent's health economy to improve the accessibility of GP services. Our ambition is for Brent to be a borough where no one is left behind – in which all residents live well, with access to high quality appropriate healthcare whenever it is needed.

Our work was conducted in the spirit of cooperation and partnership, and we were encouraged by the willingness of all of those who participated in our work to contribute to a shared vision of GP access across Brent. On behalf of my Task Group colleagues, I would like to thank everyone who participated in our work, including officers, local commissioners and service providers. In particular, I wish to thank Dr Madhuker C Patel, Brent Borough Lead at North West London CCG for his wisdom, knowledge and contribution to the Task Group's work, and to all the residents who gave their time to complete the GP access survey.

I would like to thank Councillor Ketan Sheth, Chair of the Community and Wellbeing Scrutiny Committee for inviting me to Chair the Task Group, as well as my fellow Task Group colleagues for volunteering to be part of this important work and for their vital contributions. I would also like to express my gratitude to those Cabinet Members that offered up their expertise in their respective portfolios during our research, and to the support received from officers at Brent Council, in particular those within the Scrutiny Team.

Councillor Mary Daly
Chair, GP Access Scrutiny Task Group

Recommendations

Recommendations

In light of its findings, the Task Group makes the following recommendations. The recommendations will be shared across the key partners including: Brent Council's Cabinet, Brent Integrated Care Partnership (ICP), North West London Clinical Commissioning Group (NWL CCG), North West London Integrated Care System (NWL ICS) and local primary care networks (PCNs).

The Task Group recognises that these recommendations will need to be implemented in partnership across agencies and with the support of patients and the public.

1) Brent Council's Cabinet works with NWL ICS to ensure fair funding for local health services.

The Task Group recognises the high levels of need and demand in Brent. It is recommended that Brent Council's Cabinet works with NWL ICS to ensure fair funding for local health services to meet this need.

2) Brent PCNs demonstrate a clear career development pathway for health care professionals in order to make best use of professional practice staff that enables greater capacity and more appropriate use of GPs. Brent PCNs should report progress against the development pathway to Brent ICP.

The Task Group has found that many GP appointments, such as for minor illnesses and injury, could be dealt with by a health professional. It is recommended that Brent PCNs ensure each GP practice has a clear development pathway in place for health care professionals with a view to utilising their full expertise, allowing them to deal with more routine appointments and increase the capacity of GPs. PCNs should ensure that the increased role of health care professionals in delivering GP services is communicated to patients.

3) Brent PCNs adopt a GP access and treatment standard that all GP practices sign up to and are accountable to. The standard should describe what services are available and what patients can expect from them. All patient participation groups (PPGs) should be involved in setting this standard, and PPGs should be regularly updated on the performance of the standard.

The Task Group has found that the ease with which patients access GP services varies across practices, and their experience of services varies too. An access and treatment standard will ensure that Brent residents experience consistently high levels of service in access and treatment when they need them, and in a way that suits their needs. The Brent standard should build on best practice of other local areas, and Brent Council should promote the standard across the West London Alliance.

The Task Group has identified the following access and treatment standards based on the experience of patients, which should be used a minimum:

- i. Reception and telephone access for all patient needs during opening hours
- ii. Agreed arrangements for evening and weekend access communicated to patients
- iii. Reception telephone answered within a maximum time frame or call back facility available (subject to the move to cloud based telephony systems)
- iv. Appointment and prescription requests addressed within a maximum time frame – regardless of whether request is made via telephone, online or in person

- v. Patients make one call only to make an appointment during core hours (subject to the move to cloud based telephony systems)
- vi. Appropriately trained clinicians should be involved in all stages of the triage process
- vii. Patients updated on all further action taken in respect of requests, appointments and/or treatments where these are carried out by the practice
- viii. Referrals to secondary care are clinically appropriate and in accordance with any agreed clinical pathways and referral protocols – patients are updated at each stage of the referral
- ix. For rapid access - conversation with registered clinician within fixed period in advance; emergency and urgent needs triaged within four hours. Practices clearly set out the process for routine, rapid and emergency access by agreement with NHS 111 and PPGs – this should be made clear on practice websites
- x. Flexible appointment types should be offered and booked in line with clinical need and patient's preference, including face-to-face, telephone, remote/digital and home visits – the range of appointment types should be made clear on practice websites
- xi. Bookings available to patients up to four weeks in advance for routine care and patients are made aware of process for cancelling and rebooking routine care appointments
- xii. Registration at any GP practice, where this is possible with no requirement for address, immigration status, identification or NHS number – with digital and face-to-face registration options for new patients
- xiii. Patients have their digital literacy and access to digital devices recorded on their patient file and taken into account when treatment is given
- xiv. Consent for digital communication and services and recorded in patient file
- xv. Guidance on online consultation service and digital communication communicated on practice website in easy to use language
- xvi. Patients to be able to communicate with GP practice via online consultation system and secure online messaging
- xvii. Each practice works towards developing consultant nurse practitioner and prescriber skills
- xviii. Non-clinical staff should be available at each GP practice e.g. social prescribers – availability made clear on practice websites
- xix. Treatment plans for all patient care agreed with and shared with patients
- xx. Prescription medicines issued where clinically effective and cost-effective, ensuring patients are engaged in the process at each stage by their clinical team
- xxi. Newly registered patients should receive information on GP practice and NHS England complaints procedures, as well as local complaints and advocacy services

4) Brent PCNs widely communicate the GP access and treatment standard and information on patients' rights to access and treatment including registration, appointments and prescriptions.

The Task Group has found that some patients were unaware of their rights to access GP services, the various GP services available to them, the clinical and social teams at a practice and the ways in which they are delivered. It is recommended that Brent PCNs communicate the GP access and treatment standard, as well as information on patients' rights concerning access and treatment including registration, appointments and prescriptions to ensure they have a clear understanding of what to expect from general practice. Brent PCNs should also measure and communicate the delivery of the standard, for example through the annual GP patient survey, practice websites and PPG meetings.

5) Brent PCNs develop an action plan to ensure that patient participation groups (PPGs) are supported to be actively involved in improving GP services. Brent PCNs

should report progress against the action plan to Brent ICP and Brent Community and Wellbeing Scrutiny Committee.

The Task Group is keen to ensure that practice PPGs are well resourced, representative of the practice population, have input from relevant health and voluntary professionals and are actively involved in service improvement. Brent PCNs should also set up PCN-wide PPGs that are representative of the geographical area they cover and actively involve patients in designing future service delivery. Brent ICS and Brent Community and Wellbeing Scrutiny Committee should ensure that the action plan is delivered by monitoring the effectiveness of PPGs, and Brent ICS should report to Brent Health and Wellbeing Board on PPG performance. Where appropriate, PPG representatives should be co-opted onto the Community and Wellbeing Scrutiny Committee and/or its Task Groups and consideration should be given to formalising links with Healthwatch Brent.

6) Brent PCNs demonstrate that the configuration of their services does not disadvantage patients based on where they live.

The Task Group is concerned that the current arrangement of GP services in local areas may disadvantage some patients based on where they live. It is recommended that Brent PCNs consider ensuring that their configuration recognises pre-existing localities such as the five Brent Connects footprints. This should facilitate more geographically accessible services for patients and more effective integrated working between PCNs and statutory health and care partners. PCNs should consult statutory health and care partners on any proposal to change the configuration of a PCN, and if a change is made the rationale for doing so should be communicated to registered practice patients.

7) Brent PCNs implement a SMART action plan to reduce the barriers experienced by patients when accessing GP services, with a focus on deprivation, ethnicity, disability and other protected characteristics. Brent PCNs should report progress against the action plan to Brent ICP and Brent Community and Wellbeing Scrutiny Committee.

The Task Group has repeatedly found that some groups of patients experience significant barriers and unequal access to GP services, including patients on persistent low incomes, those with a disability, some older patients, patients whose first language is not English, some children and young people, refugees and asylum seekers and those who cannot access digital technology. It is recommended that a SMART action plan is developed to advance equality of access between people who share a protected characteristic and those who do not (with consideration for the Equality Act 2010), and that the actions identified are incorporated into the access treatment standard.

8) Brent ICP should work alongside Brent Children's Trust to conduct further research into the experience of children and young people in accessing GP services and take any action as identified.

The Task Group has concern that some parents with young children and children and young people themselves are having difficulty accessing GP services, especially in accessing mental health support and rapid access to primary care for infants and young children with childhood illness. As such, there is an urgent need to quantify the service offer for children and young people. It is recommended that Brent ICP works alongside Brent Children's Trust to commission necessary expertise to conduct further research on this matter, and that the findings inform an update of the actions identified in the SMART action plan to address the barriers to access and deliver the GP access and treatment standard.

Introduction

The last in-depth review by scrutiny of primary care in Brent was in 2015. It was therefore felt both timely and necessary for the Community and Wellbeing Scrutiny Committee to undertake a review of GP access in Brent. The previous scrutiny task group looked at the ability of primary care to meet demand and provide fair and equitable access, and recommended investment in access, development of innovative ways to meet and arrange demand, and encouraged residents to support themselves where possible in terms of improving their own health and wellbeing.

The GP Access Task Group was established to review the accessibility of general practice in Brent following the end of lockdown in March 2021. It was considered timely in terms of the pressures on primary care and the transformations underway in general practice and the wider health economy, some of which have been accelerated in response to the Covid-19 pandemic. Importantly, the Task Group was set up in response to residents' concern about the ease with which they are able to access their local GP practice.

General practice plays a key role in promoting health, preventing illness, and helping patients to manage long-term conditions. A GP practice provides the first point of contact in the healthcare system, and is the main point of access to other parts of NHS care such as acute and community services.

The significance of the role of general practice and the right of patients with regard to GP services are set out in the NHS Constitution:

- You have the right to choose your GP practice, and to be accepted by that practice unless there are reasonable grounds to refuse, in which case you will be informed of those reasons.
- You have the right to express a preference for using a particular doctor within your GP practice, and for the practice to try to comply.
- You have the right to transparent, accessible and comparable data on the quality of local healthcare providers, and on outcomes, as compared to others nationally.
- You have the right to make choices about the services commissioned by NHS bodies and to information to support these choices.

The NHS also pledges to:

- Inform you about the healthcare services available to you, locally and nationally
- Offer you easily accessible, reliable and relevant information in a form you can understand, and support to use it.¹

Task Group Membership

The Task Group was comprised of the following six elected members:

- Councillor Mary Daly (Chair)
- Councillor Abdi Aden
- Councillor Tony Ethapemi
- Councillor Claudia Hector
- Councillor Gaynor Lloyd
- Councillor Ahmed Shahzad OBE

¹ NHS England, (2021), NHS Constitution

Terms of Reference

The following Terms of Reference were agreed for the Task Group:

- i) To gather findings based on quantitative data and information about GP accessibility based on face-to-face appointments, physical and digital access, and qualitative information from patients' experiences with particular reference to those who are older, have mental health needs or a disability, and who have long-term health conditions.
- ii) To review the overall local offer of GP services, including the extended GP access hub service, and evaluate any variation in accessibility by practice and the underlying reasons for any variation with particular reference to clinical capacity and nursing.
- iii) To evaluate the local demand to access primary care, changes in demand during the Covid19 pandemic and changes in access to GP services during the pandemic with particular reference to digital accessibility and face-to-face appointments.
- iv) To understand the role of primary care in addressing health inequalities by gathering findings on population health, deprivation and demographic trends in the borough with particular reference to Black and Minority Ethnic (BAME) patients.
- v) To develop a report and recommendations for local NHS organisations and the local authority's Cabinet based on the findings and evidence gathered during the review.

Methodology

The Task Group gathered qualitative and quantitative evidence to complete its report and develop its recommendations. In particular, the Task Group carried out a number of discussions with those involved in providing GP services. A full list of those who took part is detailed in Appendix A.

Members of the Task Group took part in seven themed evidence sessions in which they discussed issues relating to GP accessibility and demand, health inequalities, primary care workforce and capacity, GP digital services and digital exclusion, mental health services, GP contingency planning and the vision for primary care in Brent.

As well as carrying out evidence sessions, the Task Group requested data and quantitative information from a range of stakeholders. The Task Group also developed and carried out a survey on patients' experience of accessing GP services since March 2021, which comprised of a questionnaire with scalable answers provided by anonymised residents. Task Group members worked alongside Healthwatch Brent as volunteer data collectors to conduct the survey in various communities in Stonebridge, Preston, Wembley and Willesden.

Recommendations were developed according to existing legislation for local authority scrutiny. The Task Group notes that an external body or local authority executive is not compelled to act on a recommendation; however, a local authority executive must respond within two months, and NHS organisations are expected to give a meaningful response within 28 days of recommendations being agreed by a scrutiny committee.²

During the review, the Task Group had the opportunity to speak with a range of key stakeholders who shared their opinions and experiences of services. The Task Group recognises that people have different experiences of general practice and, through the analysis of information gathered, has tried to present a balanced view of the opinions given.

² Department of Health (2014), Local Authority Health Scrutiny

Background

The local health profile

Brent is home to around 327,800 people, making it the ninth largest borough in London. The Brent population has been growing strongly over the last few decades, with the population growing by 27% from 1998-2018 – an increase of 70,900 residents. The population is expected to grow by another 17% between 2020 and 2041 - an increase of 56,700 residents. The wards of Tokyngton and Alperton are expected to see the fastest growth: considered together, they are projected to accommodate an additional 33,200 residents by 2041.³

In Brent, life expectancy has been growing steadily. Life expectancy for men in Brent was 81.3 between 2017 and 2019, and 85.5 for women. This is slightly higher than the London average – which is 80.9 for males and 84.7 for women. Healthy life expectancy (the number of years of full health rather than with a disability or in poor health) for men in Brent was 61.6 between 2017 and 2019 – lower than the London average of 63.5. For women, it was 71.3 – second highest behind Richmond upon Thames.⁴ Healthy life expectancy is fundamental to a person's quality of life and reducing pressures on primary care.

The premature mortality (dying under the age of 75) rate from all causes in Brent is 288 per 100,000, compared to 326 nationally and 299 across London between 2019 and 2020. Brent has a high rate of premature mortality from cardiovascular disease at 76.2 per 100,000 people, compared to 70.4 nationally 69.1 across London 2019 and 2020. Brent ranks comparatively well nationally in regards to premature mortality caused by cancer with 108.9 per 100,000 compared to 129.2 nationally and 117.4 in London 2019 and 2020.⁵ The number of older people with higher dependency is predicted to rise by 62% between 2015 and 2035, which is likely to increase demand on primary care.⁶

In 2018, the proportion of adults aged 18 and over in Brent who are overweight or obese was 55.4%, compared to the national average of 63%. While this is significantly better than the national average, it still represents a present and future burden on primary care. Although rates have improved slightly in recent years, fewer residents in Brent are active (for more than 150 minutes a week) than London and Brent is the fourth most inactive borough in London. Just over half of adults (55.5%) in Brent are estimated to achieve the recommended minimum five portions of fruit and vegetables per day – similar to the national average of 54.8%.⁷

³ Brent Council (2021), Population Change in Brent

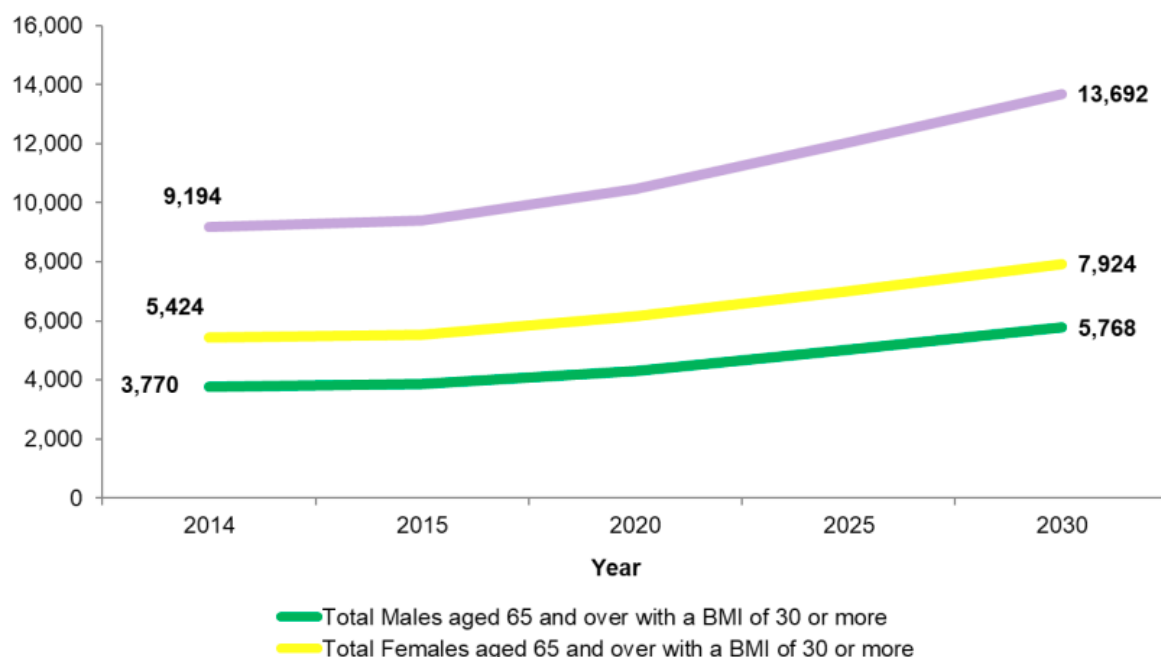
⁴ Office for National Statistic (2021), Health and life expectancies

⁵ Public Health England (2019), Local Authority Health Profiles

⁶ Brent Council (2019), Inclusive Growth Strategy: Health

⁷ Brent Council and Brent Clinical Commissioning Group (2019), Joint Strategic Needs Assessment: Health and Lifestyle

Figure 1: People aged 65 and over who are obese or morbidly obese in Brent projected to 2030⁸



Childhood obesity in Brent is especially high – this is problematic because childhood obesity can affect an individual’s health and wellbeing for the long-term, as it is also a predictor of adult obesity. In Brent, 1 in 3 children are obese by the time they leave primary school. In 2019, Brent had a higher prevalence of obese school children leaving primary school compared to the national and London average – in 2019, 26% of children in Brent were obese at Year 6, compared to 23% across London and 20% across England. By 2023, it is estimated that 70% of adults in Brent will be overweight or obese.⁹

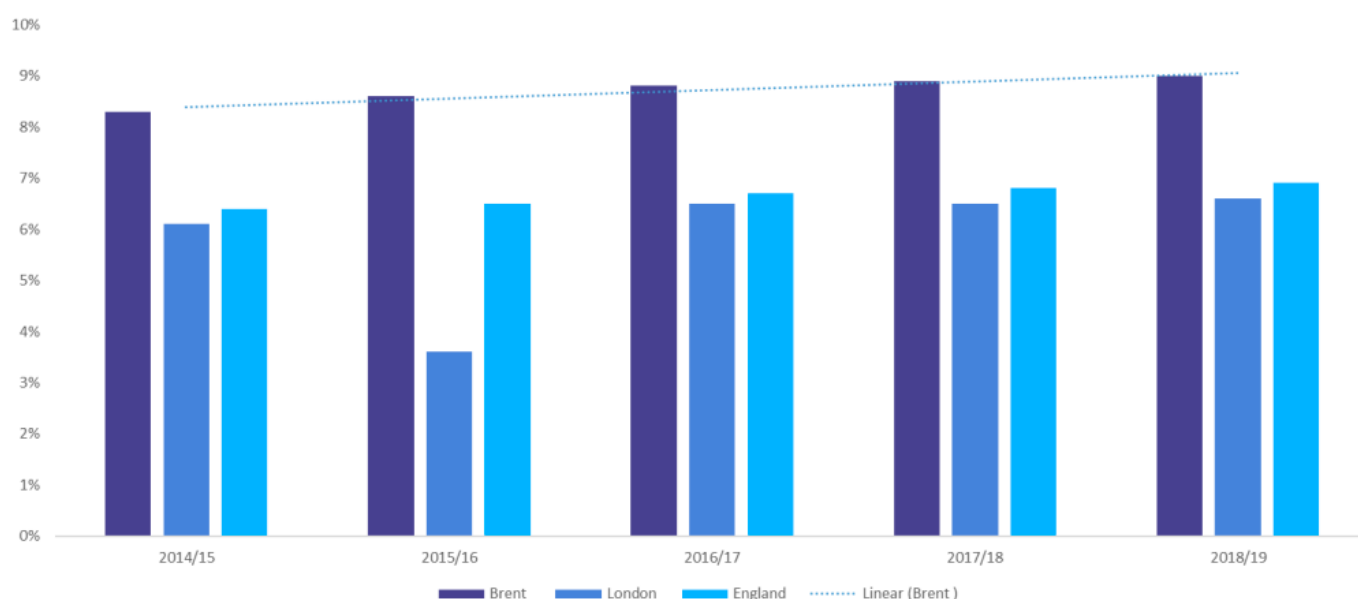
In Brent, 17% of all deaths are attributable to diabetes - by 2030, it is estimated that nearly 15% of people aged 16 and over in Brent will have diabetes. In 2019, 9% of adults in Brent had diabetes, compared with 6% across London and 7% nationally. Research shows that people of South African, African, African Caribbean and Middle Eastern descent have a higher than average risk of Type 2 diabetes. Demographic changes and the high obesity rate mean that, if the costs of treating a patient with diabetes stays the same, the overall costs of diabetes are set to grow in England over the next 20 years, when it is projected to account for 17% of the entire NHS budget. This is mainly because of its complications, such as amputation, kidney failure and strokes.¹⁰

⁸ Ibid

⁹ Brent Council and Brent Clinical Commissioning Group (2019), Joint Strategic Needs Assessment: Childhood Obesity

¹⁰ Brent Council and Brent Clinical Commissioning Group (2019), Joint Strategic Needs Assessment: Diabetes

Figure 2: Prevalence of adults (17+) with diabetes in Brent, London and England



It is estimated that 16% of the adult population in Brent has a common mental health disorder – slightly higher than the national average of 15.1%.¹¹ Data suggests that a high proportion of people in Brent feel low levels of worthwhileness, happiness and satisfaction – 17% feel low levels of satisfaction and 16.7% feel high levels of anxiety. Mental health issues often begin in childhood, with 50% of mental health problems being established by age 14 and 75% by age 24. The Covid-19 pandemic has served to exacerbate these – studies show that almost half of all 16-24 year olds nationally showed new symptoms of psychological distress during the pandemic.¹² As of 2017, Brent had approximately 7,000 residents with a learning disability when applied to census population estimates and, between 2014 and 2030, the number of people in Brent with a learning disability is expected to rise by 8%.¹³ We know that people with a learning disability have worse physical and mental health outcomes than people without a learning disability – in fact, the life expectancy of women with a learning disability is 17 years shorter than women in the general population, and 14 years shorter for men with a learning disability compared to men in the general population.¹⁴

There is a strong correlation between deprivation and health in Brent. In Brent, the life expectancy gap between the most and least deprived areas is 4.7 years for men and 4.4 years for women. In the ten year period between 2011 and the 2011 Census, overcrowding increased substantially – in Brent, there was an increase of 8,745 overcrowded units. In 2010, 12.1% of households in Brent were overcrowded, which was the third highest level amongst London boroughs, and was much higher than the London-wide overcrowding level which was 7.5%.¹⁵ Within Brent, around half of households in the private rented sector claim Housing Benefit and 45% of people claiming Housing Benefit are in the PRS. Such data suggests that a significant number of people in poverty in Brent are in the private rented sector, where rents are higher and there is less security.¹⁶ In 2015, Brent had the highest number of households in temporary accommodation. However, it has managed to reduce the overall number of

¹¹ Brent Council, (2018), Public Mental Wellbeing Strategy and Action Plan

¹² Mental Health Foundation (2020), Mental Health Statistics: Children and Young People

¹³ Brent Council & Brent Clinical Commissioning Group (2017), Joint Learning Disability Strategy 2017-2020

¹⁴ NHS Digital (2020), Health and Care of People with Learning Disabilities

¹⁵ Brent Council (2013), Brent 2011 Census Profile

¹⁶ Brent Council (2020), A Fairer Future: Ending Poverty in Brent

households in temporary accommodation by 10% year on year between 2015 and 2020, leaving it as the 7th highest.¹⁷ The effects of poor housing on physical and mental health are well documented, especially in relation to overcrowding and substandard housing conditions. Poor housing can lead to a number of health issues, including people seeking medical help or taking medication for mental health issues, not getting enough sleep, people experiencing depression or stress, as well as those falling physically ill or catching Covid-19.

Fuel poverty (the inability to adequately heat a home) is caused by low income and poor housing standards. Data shows that 17,000 households in Brent are in fuel poverty – 15% of all households in the borough. Brent has the second highest rate of fuel poverty of any London borough, and 14th highest of all 326 local authorities across England.¹⁸ The health impacts of fuel poverty for children include weight gain, high hospital admission rates, lower developmental status, and the severity and frequency of asthmatic symptoms. For older people it is associated with higher mortality rates and has a negative impact on physical health. Hospital stays for alcohol-related harm were highest in the two most deprived areas of Brent – Stonebridge and Harlesden – suggesting that poverty is closely linked to people's ability to make healthy lifestyle choices.¹⁹

Brent workers are relatively low paid: almost one third of residents (31%) earned less than the London Living Wage – the second highest percentage in London, after Newham. The local economic consequences of the Covid-19 pandemic are set to be significant – Brent had the second highest proportion of its working age population furloughed in London. Most jobs in Brent are in less well paid occupations (such as wholesale/retail, health and care, hospitality, transportation and food industries). As such, a high proportion of the workforce – 29% earned less than the living wage as of 2019.²⁰ Unemployment and insecure or low-paid employment has consistently been found to have a negative impact on health, such as the increased prevalence of mental health issues.

The local health economy

Brent has 51 GP practices, with practice list sizes ranging from 533 patients to 22,685. A full list of practice sizes is shown below.

¹⁷ Brent Council (2020), Homelessness and Rough Sleeping Strategy

¹⁸ Ibid

¹⁹ Brent Council (2020), A Fairer Future: Ending Poverty in Brent

²⁰ Brent Council and Brent Clinical Commissioning Group (2019), Joint Strategic Needs Assessment: Economy and Employment

Figure 3: List of PCNs and practice sizes in Brent²¹

PRACTICE	PCN AREA	Practice List Size 01/01/2021
Brentfield Medical Centre	Harness South	9075
Church End Med Centre	Harness South	7986
Stonebridge Medical Centre	Harness South	7284
Aksyr Medical Centre	Harness South	4624
Hilltop Medical Practce	Harness South	4196
Oxgate Gardens Surgery	Harness South	6727
Roundwood Park Medical Centre	Harness South	4775
Walm Lane Surgery	Harness South	7841
Park Royal Medical Centre	Harness South	7895
Freuchen Medical Centre	Harness South	8929
Total Harness South		69332
The Surgery	Harness North	5680
Pearl Medical Practice	Harness North	4838
Wembley Park Drive Medical Centre	Harness North	12448
SMS Medical Practice	Harness North	5355
Lanfranc	Harness North	6045
Sunflower Practice	Harness North	3202
Church Lane Surgery	Harness North	9201
Willow Tree Family Doctors	Harness North	15917
Preston Road Surgery	Harness North	4359
Sudbury & Alperton Practice	Harness North	8694
Total Harness North		75739
Kilburn Park Medical	Kilburn Partnership	8492
Chichele Road Surgery	Kilburn Partnership	5656
Staverton Medical Centre	Kilburn Partnership	8925
Mapesbury Medical Centre	Kilburn Partnership	8906
Peel Precinct Surgery	Kilburn Partnership	533
Willesden Green Surgery	Kilburn Partnership	6197
The Law Medical Centre	Kilburn Partnership	17899
Total Kilburn		56608
Gladstone Medical Centre	K&W South	9326
Willesden Medical Centre	South	13678
St George's Medical centre	South	2245
Burnley Practice	South	9431
St Andrews Medical Centre	South	1839
The Lonsdale	South	22685
Total K&W South		59204
Neasden Medical Centre & Greenhill Park	North	9678
Uxendon	North	5469
Jai Medical Centre	North	6369
The Fryent Way	North	8273
Kingsbury Health & Wellbeing	North	4572
Brampton	North	5347
Kings Edge Medical Centre	North	3637
Total K&W North		43345

²¹ NHS Digital (2021), Patients Registered at a GP Practice

Forty Willows Surgery	Central	6905
Tudor House Medical Centre	Central	3897
Chalkhill Practice	Central	7119
Ellis Practice	Central	8876
Preston Road Medical	Central	6875
Sudbury Surgery	Central	8684
Total K&W Central		42356
Premier Medical Centre	West	9293
The Wembley Practice	West	14312
Hazeldene	West	24569
Alperton	West	5855
Lancelot	West	7017
Stanley Corner	West	6008
Total K&W West		67054

The total number of each type of NHS GP contract held by GP practices in Brent is shown below, and further information on the NHS GP contract is provided in Appendix E. 75% of GP practices in Brent operate under the GMS contract – much like nationally, where 70% of GP practices operate under it.²²

Figure 4: Total numbers of GP practices in Brent by contract type²³

Contract type	Total number of contracts in Brent
General Medical Services	37
Personal Medical Services	10
Alternate Providers of Medical Services	4
Total	51

In a report presented to the Community and Wellbeing Scrutiny Committee in July 2017, Brent CCG outlined its ambition to increase the capacity and effectiveness of primary care in the borough. Brent CCG stated that it would focus on extended access and improved access to GP services, provider development and resilience at both individual practice level and at scale, online consultations and the use of technology, developing the local primary care workforce and the delegation of commissioned GP services.²⁴ The report also highlighted the significant pressures facing primary care in Brent, including an increasingly ageing population, increasing demand on services, variation in care quality and outcomes, financial pressures, ageing infrastructure and recruitment and retention issues.

In 2019, the organisation of GPs in Brent changed with the establishment of PCNs. A PCN is a group of general practices working together with a range of local providers, including across primary care, community services, social care and the voluntary sector, to offer more personalised, coordinated health and social care to local populations. PCNs are expected to be consistent in their sizes and geography, and with local ICP and CCG/ICS footprints. Initially in Brent, the GPs established ten PCNs, but later decided to reduce the number to seven in order to work at scale. There are now 51 practices affiliated with the seven PCNs, as detailed in Figure 3. All seven PCNs are led by GP Clinical Directors.

PCNs are expected to be the mechanism by which primary care representation is made

²² NHS Digital (2020), NHS Payments to General Practice

²³ North West London CCG, Evidence received at Evidence Session 1

²⁴ Report to the Community and Wellbeing Scrutiny Committee (July 2017), Brent CCG: Primary Care Transformation

stronger in integrated care partnerships (ICPs) and integrated care systems (ICSs), with the accountable clinical directors from each network being the link between general practice and the wider system. ICSs seek to bring together all NHS organisations and local authorities to redesign care and improve the health of local populations, and will take the lead on planning, commissioning care and providing system leadership. All NHS organisations and local authorities in North West London have been working as an informal ICS, led by an Independent Chair and a Chief Executive. The Health and Care Bill was published in July 2021, with ICSs due to become legally recognised bodies in July 2022.

ICSs will also have a key role in working with local authorities, hospitals, community services, mental health services and GPs at local levels at 'place' level through integrated care partnerships (ICPs). 'Place' has a smaller footprint than the ICS, and in many cases will be that of the local authority. The Brent Integrated Care Partnership Executive Committee (ICPEC) is the place-based ICP in Brent within the ICS.

Demand on GP services

Registered patients

The number of registered patients across GP practices in Brent has risen since 2015 and is continuing to rise. As of April 2021, there were 422,377 registered patients across Brent's 51 GP practices, compared to 365,165 across 67 GP practices in April 2015. Of those patients 220,609 were men, and 201,768 were women.²⁵ A breakdown of the number of registered patients by age groups can be seen below.

Figure 5: Number of registered patients in Brent by age group²⁶

0-4 22,067	5-14 46,600	15-44 211,968	45-64 98,972
65-74 24,268	75-84 13,156	85+ 5,346	

The picture is similar across North West London CCG. Between November 2020 and November 2021, registered patients grew by over 100,000.²⁷ Population projections for Brent suggest an ongoing increase in the number of residents in the borough, and a further increase in patients registered to a GP practice in Brent. It is important to note that the population is not projected to increase in all wards. Tokyington (+85%), Alperton (+84%) and Dollis Hill (+47%) are projected to increase most between 2020-41, whereas Queens Park (-9%), Sudbury (-7%) and Kensal Green (-7%) are projected to decline most.²⁸

These projections also show likely changes to the age profile of residents with an increase in older people. The number of registered patients is largest in the 15-44 age group, and as these patients get older they are likely to place additional pressure on GP services. This correlates with increased prevalence of long-term health conditions such as diabetes. For example, Kingsbury and Willesden North PCN has one of the highest prevalence for diabetes, which may be due to the PCN having a greater population of 64+ years.²⁹

GP practice workforce

Before merging into a single CCG as North West London CCG, Brent was ranked the 7th most under doctored CCG in London with a decreasing and older GP workforce. It was identified as having the most patients per nurse in London as well as the greatest proportion of nurses over 55.³⁰ As of December 2020, Brent had 177 GPs, 58 nurses, 77 direct patient care staff (such as pharmacists and physician associates) and 351 administration/non-clerical staff (such as practice managers and receptionists).³¹

²⁵ NHS Digital (2020 & 2021), Patients Registered at a GP Practice

²⁶ Ibid

²⁷ Ibid

²⁸ Brent Council (2021), Population Change in Brent

²⁹ North West London CCG, Evidence received at Evidence Session 1

³⁰ Ibid

³¹ NHS Digital, (2020), General Practice Workforce

Figure 6: Total number of GPs and other healthcare professionals in all Brent practices³²

GP Partners	GP Salaried	Practice Managers	Nurses	Pharmacists	Physician Associates	Receptionists
94	53	56	58	12	5	225

It is important to note that the general practice workforce has seen little growth nationally since 2015, with the number of GP partners significantly declining over that time. As of September 2021, there were 1,704 fewer fully qualified full-time GPs nationally compared to 2015.³³ The picture is much the same in Brent – the number of fully qualified full-time GPs in Brent has decreased from 200 in 2015 to 177 in December 2020. Similarly, the number of nurses in the borough has decreased from 105 in 2015 to 58 in December 2020.³⁴

However, the level of cover of GPs varies across England – in 2019, North West London had the lowest number of GPs per 100,000 population (54). Some differences are justifiable because the need for healthcare varies due to factors like age, poverty, and rurality in different areas. However, there is concern that there are significantly less GPs per head in North West London than other regions across London.³⁵ It should be noted that the cover of the GP workforce varies across North West London, too – while Brent had 177 fully qualified full-time GPs in December 2020, Ealing had 221. Similarly, while Brent had 58 nurses in December 2020, Ealing had 82.³⁶

Recruitment and retention programmes are being introduced in Brent to reverse the decline in the GP and general practice nurse workforce with fellowships for newly qualified and experienced GPs and general practice nurses, continuing professional development training opportunities, clinical skills development, staff education forums and mentorship and supervision. The introduction of the Additional Role Reimbursement Scheme in 2020, which provides funding for PCNs to recruit to new roles to expand their healthcare teams, has also sought to increase the direct patient workforce with the introduction of new roles such as nursing associates, pharmacy technicians, mental health therapists and physiotherapists.

It is important to recognise that GPs, nurses, direct patient care staff and administrative/non-clerical staff work together in practices as part of multidisciplinary teams, with other healthcare professionals within PCNs called upon when necessary. Practice nurses have become significantly more skilled over recent years and are now providing some services to patients that were previously delivered by GPs, leading to the creation of roles such as nurse practitioners (a nurse who has additional education and training in a speciality area, such as family practice or paediatrics) and independent nurse prescribers (nurses that are able to prescribe any medicine for any medical condition). Some practices may implement nurse-led triage services, meaning that only patients who need to see a doctor are seen by a GP and the remaining patients have their needs met by other healthcare professionals or services, releasing GP time for essential cases.

³² Ibid

³³ NHS Digital, (2015, 2020 & 2021), General Practice Workforce (comparison of 2015, 2020 and 2021 data)

³⁴ Ibid

³⁵ Nuffield Trust (2019), Level of GP staffing in 2018

³⁶ NHS Digital, (2015, 2020 & 2021), General Practice Workforce (comparison of 2015, 2020 and 2021 data)

The Task Group has concerns regarding the issue of recruitment and retention and the impact this may have on the ability of patients to access GP services. It is clear that there are fewer GPs and other primary healthcare professionals in Brent, despite the number of registered patients rising since 2015. More registered patients does not just mean greater demand for appointments, but also more paperwork, test results and administrative work too. This, mixed with rising patient need, places additional pressure on GP practices.

Covid-19 pandemic

Since the start of the pandemic, the impact of Covid-19 on primary care, and those working within it, has been significant. Staff have been under considerable pressure to maintain services despite social distancing measures, adjusting to virtual consultations and helping to roll out the Covid-19 vaccine. In March 2020 the UK government instructed GP practices to conduct consultations remotely unless there was urgent need for a face-to-face appointment. As a result, most GP practices stopped using face-to-face appointments and introduced remote or digital consultation (via telephone, online message or video) to reduce footfall, and protect patients and staff from risk of infection. Many of these types of consultations continue to be delivered to patients today.

Despite the end of lockdown in March 2021, there remains practical challenges to delivering routine care while Covid-19 remains a risk. Infection control measures are likely to slow the pace at which patients can be treated, having an impact on waiting times and people's outcomes and experiences of care. GP practices also face the challenge of delivering routine care at the same time as continuing to deliver a mass vaccination campaign. GP services will also need to deal with the ongoing health effects of Covid-19, including rehabilitation needs stemming from the virus, and support for those whose health has deteriorated as a result of delayed presentations or gaps in routine care.

Recommendation 1

Brent Council's Cabinet works with NWL ICS to ensure fair funding for local health services.

The Task Group recognises the high levels of need and demand in Brent. It is recommended that Brent Council's Cabinet works with NWL ICS to ensure fair funding for local health services to meet this need.

Recommendation 2

Brent PCNs demonstrate a clear career development pathway for health care professionals in order to make best use of professional practice staff that enables greater capacity and more appropriate use of GPs. Brent PCNs should report progress against the development pathway to Brent ICP.

The Task Group has found that many GP appointments, such as for minor illnesses and injury, could be dealt with by a health professional. It is recommended that Brent PCNs ensure each GP practice has a clear development pathway in place for health care professionals with a view to utilising their full expertise, allowing them to deal with more routine appointments and increase the capacity of GPs. PCNs should ensure that the increased role of health care professionals in delivering GP services is communicated to patients.

Access to GP services

Registering with a GP practice

The number of unregistered patients is not routinely monitored by most CCGs in England – including North West London CCG. The trend of patients registered at GP practices has been in excess of population estimates since recording began in 2013 – though this is thought to be because patients who should have been de-registered are still recorded (for example, because patients move away and do not de-register when they leave).³⁷

Anecdotal evidence heard by the Task Group suggests that a significant portion of Brent residents are not registered with a GP practice. Not registering with a GP may be a personal choice (for example, short or medium-term economic immigrants or people who have relocated who are younger and healthier may defer registration until they need to see a GP) or due to systematic barriers (for example, homeless patients or refugees have difficulty accessing NHS services because they have no permanent address). It is also important to note that some residents may be registered with a GP practice outside of Brent.

“I was recommended a GP practice to register with on e-consult. However, that practice refused to register me. I tried another and they refused to register me too. I finally managed to register with a third practice, but this was outside of Brent.”

Patient from Park Royal

NHS England guidance makes it clear that you do not need to have proof of address, immigration status, identification or NHS number when registering with a GP. This also applies if you are an asylum seeker, refugee, homeless patient or an overseas visitor – whether lawfully in the UK or not. However, a GP practice does have the right to refuse registration if the practice cannot take on new patients, if the practice is not accepting patients that do not live within its practice boundary or if it may not be appropriate for a patient to register with a practice because it is a long way from where they live.

Booking an appointment

Nationally, 21 million fewer primary care appointments were booked between April 2020 and March 2021 compared to the previous 12 months – a fall from 310 million to 279 million. The picture was similar in Brent - in total, GPs across Brent delivered 1.7 million appointments from March 2019 to February 2020, yet delivered just 1.56 million appointments between March 2020 and February 2021.³⁸ However, appointments have largely returned to pre-pandemic levels since March 2021. In September 2021, 1.9 million GP appointments were delivered in North West London compared to 777,737 in September 2020. It should be noted that this may in part be due to the number of Covid-19 vaccinations delivered by practices.

Of the respondents to the Task Group survey who had booked one or more GP appointments since March 2021, 83% booked via telephone, 21% booked via their GP's app or website and 12% booked by visiting their GP practice. It appears that many GP surgeries are still using

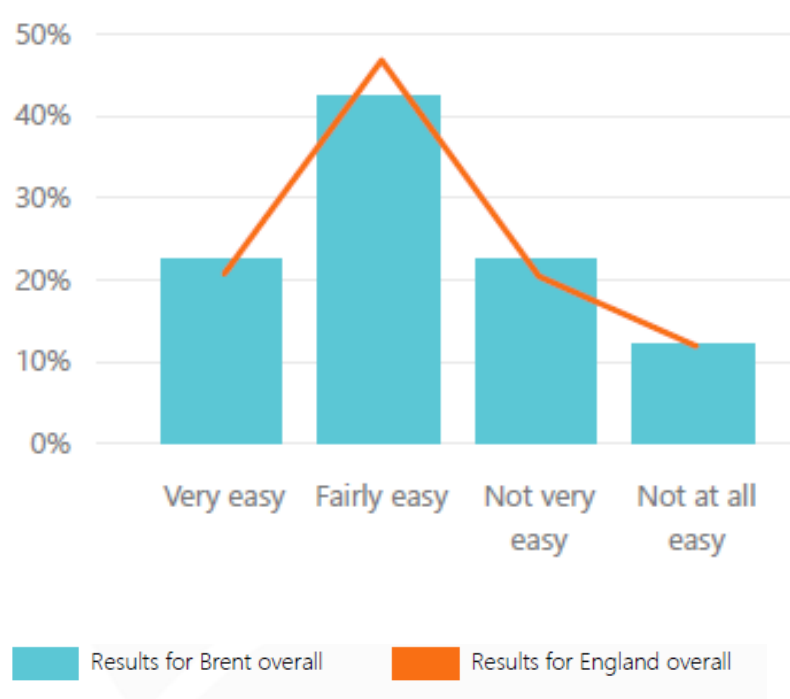
³⁷ NHS Digital (2021), Patients Registered at a GP Practice

³⁸ NHS Digital (2020 & 2021), Appointments in General Practice

online triage systems such as eConsult, or telephone triage via a receptionist or practice nurse to determine which type of appointment to provide. This often means that patients are offered telephone or video consultations first and face-to-face appointments if the initial appointment(s) indicates it would be appropriate. The Task Group is concerned that this may mean that some people have three interactions with their GP practice before they get the care they need.

Local health commissioners have said that the scale and configuration of telephony systems across Brent varies. The Covid-19 pandemic has placed primary care telephony in Brent under the spotlight, which has highlighted some of the limitations with older traditional telephony systems. People would often not be able to get through to GP practices or, if they did, found that appointments were fully booked. In fact, 29% of people in Brent found it difficult to get through to their GP practice on the phone in 2021, compared to 25% nationally.³⁹

Figure 7: Ease of getting through to someone at GP practice on the phone in 2021⁴⁰



Some patients have expressed their frustration about telephone appointments and not knowing exactly when a doctor will call within a wide time slot. Some patients were discouraged by the short slots given to appointment bookings on each morning, and spoke of unsuccessful waits to get through to a receptionist to book an appointment. Other patients have been told that a GP will call any time in the morning or afternoon, or any time during opening hours without checking if this is convenient. People who work full-time may find this particularly difficult. For many people this challenge is also exacerbated by needing an interpreter, carer or family member to help with the appointment.

³⁹ NHS England (2021), GP Patient Survey: Brent results

⁴⁰ Ibid

"I had difficulty getting through to my GP practice on the phone and, once I did get through, I waited a long time to be called back by a doctor."

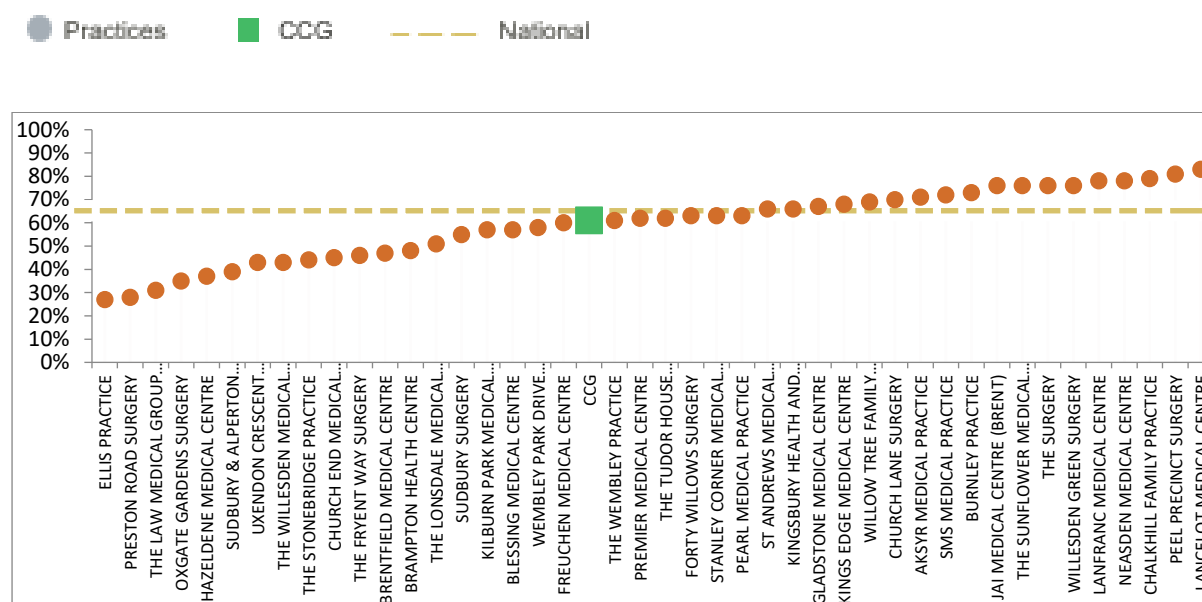
Patient from Wembley

"Booking an appointment on the telephone is stressful. It feels like pot luck whether I get through or not."

Patient from Stonebridge

As in Figure 8, there is significant variation in the percentage of patients saying it is 'easy' to get through to someone on the phone at practice level. Currently, practices are responsible for providing their own telephony systems paid for using funding allocated to them by NHS England, and some practices are locked into expensive contracts with telephony systems which may not be capable of effectively supporting new ways of working. The Task Group has heard that practices are looking at proposals to share back office functions at PCN level, including telephony systems. While such integration is encouraged and the benefits of a shared front-door experience is recognised, such a system would need to be adequately funded and ensure that patients' access to the care that they need is not adversely impacted.

Figure 8: Percentage of patients saying it is 'easy' to get through to someone on the phone⁴¹



⁴¹ NHS England (2020), GP Patient Survey: Brent results



It was frequently heard that some patients experience difficulties when trying to use GP websites or apps to book appointments. 28% of patients in Brent found it difficult to use their GP practice's website to look for information or access services in 2021.⁴² Different online platforms were used at different GP practices, although the most of common of those was eConsult (33% of respondents to the Task Group survey had used eConsult since March 2021). eConsult is an online platform that patients access via their GP practice website. Patients who want help for a specific condition are given options to access self-help information, learn about pharmacy treatments or contact NHS 111. Patients can also submit their symptoms to a GP electronically through their practice website, creating an online consultation. Any urgent symptoms identified during this process will immediately signpost the patient to their practice, emergency services or NHS 111. Some respondents felt that their GP practice did not have clear information on how to book appointments through their website, and others said that the format of some GP websites made it difficult to read or navigate to information on how to make an appointment.

⁴² NHS England (2021), GP Patient Survey: Brent results

Figure 9: Ease of using GP practice websites to look for information or access services⁴³



It has been found that some people were unsure if their online requests were successful, as people did not always receive notification, leading to people having to chase their GP practice to ensure requests had gone through. Others experienced missing information in online communications, such as a missing link to upload requested information. Such difficulties in using online platforms such as eConsult has created issues for GP practices too, with some reporting that unnecessary requests had been made around minor conditions manageable at home and that the time required to process requests created staff capacity issues. There is concern that patients at some practices are finding it easier to use digital or remote services than others – suggesting that there is variation in the online consultation service offered across practices. While the Task Group recognises the benefits of online consultation platforms, especially in relation to simple and routine medical enquiries and repeat prescriptions, it is keen to ensure that it does not replace investment in the GP workforce.

“I found e-consult confusing and difficult to use. I ended up calling NHS 111 instead.”

Patient from Preston

“I found it unhelpful for acute problems such as abdominal pain, headaches or rashes. It cannot judge the severity of your physical symptoms like a GP can.”

Patient from Alpertown

The Task Group has heard that North West London CCG are currently looking at proposals to recommission its service provider for online consultations, with eConsult’s contract due to expire shortly. The Task Group welcomes the offer to meet with North West London CCG and

⁴³ Ibid

share its views on the current service, which it hopes will support the procurement exercise and help to deliver an improved online consultation service for patients in Brent.

Some respondents to the Task Group survey felt that the receptionist at their GP practice was unhelpful, or made it difficult to book an appointment. Receptionists in GP practices are generally the first point of contact for people seeking medical help, acting as gatekeepers to the service. In fact, 16% patients in Brent did not find their receptionist helpful in 2021, compared to 11.3% nationally.⁴⁴ However, it is important to note that the role of a receptionist has been more challenging than ever throughout the Covid-19 pandemic, with receptionists receiving a high volume of telephone and online requests with patients being asked to avoid trips to the practice.

“The receptionist at my GP practice wanted to know my medical issues before they would book me an appointment with a doctor. I found this quite intrusive.”

Patient from Wembley

Overall, 60% of people in Brent described their experience of making an appointment in Brent in 2020 as good, compared to 65% nationally. Of those, 19% described it as poor, compared to 17% nationally.⁴⁵ Of those who responded to the Task Group survey and had contacted their GP since March 2021, 43% had found it either more difficult, much more difficult or were unable to contact the GP at all.

Some residents said that they were giving up before they are offered an appropriate GP appointment, and even presenting at A&E as an alternative.. Of the respondents to the Task Group survey who had used healthcare services other than their GP practice since March 2021, 27% had used NHS 111 and 26% had used A&E after making contact with their GP – suggesting that patients did not always access the necessary care at the first time of asking. As demonstrated in Indeed, 19% of patients went to A&E after declining an appointment with their GP in 2020, compared with 13% nationally.⁴⁶ This may put additional pressure on A&E units – with some patients presenting with issues that could be resolved at general practice.

It is important to note that the majority of respondents to the Task Group survey were happy with the treatment they received from their GP since March 2021. Of those who had sought care and treatment from their GP practice since March 2021, 52% felt that their GP had been good or very good at giving them enough time, and 60% felt that their GP had been good or very good at listening to them. This suggests that the main issue for many patients is accessing GP services, rather than the care they receive from GPs themselves.

Type of appointment

Unlike the overall number of appointments delivered by GP practices, the number of face-to-face appointments offered has failed to return to pre-pandemic levels. Following the easing of social distancing rules in May 2021, NHS England issued updated guidance for GP practices which stated that all practices must ensure they are offering face-to-face appointments alongside the use of video, online and telephone consultations.⁴⁷ Nationally, only 58% of

⁴⁴ NHS England (2021), GP Patient Survey: Brent results

⁴⁵ NHS England (2020), GP Patient Survey: Brent results

⁴⁶ Ibid

⁴⁷ NHS England (2021), Updated Standard Operating Procedure to Support the Restoration of General Practice Services

appointments in August 2021 were face-to-face, compared with 54% in January 2021 and 80% before the pandemic.⁴⁸ The picture is the same across North West London – 62% of appointments in August 2021 were face-to-face, compared with 64% in January 2021.⁴⁹ Of those respondents to the Task Group survey who had been offered a consultation with their GP since March 2021, 68% were via telephone, 8% were via video and 28% were face-to-face.

Many residents said that they were not given a choice of appointment when making contact with a GP practice. NHS England issued updated guidance on patients' choice of consultation type in May 2021, stating that practices should respect preferences for face-to-face care unless there were good clinical reasons to the contrary.⁵⁰ The benefits of using online or telephone triage is well documented and recognised. However, there is concern that patients are becoming increasingly dissatisfied with the type of appointment offered, as well as the lack of choice in the appointment offered. Last year in Brent, 36% of patients were unsatisfied with the type of appointment they were offered, compared with 27% nationally.⁵¹

Moreover, some respondents to the Task Group survey stated their dissatisfaction with the type of appointment given by their GP practice since March 2021. Some people preferred the option of face-to-face appointments, whereas others believed that a lack of face-to-face appointments hindered an effective diagnosis. It was felt that, in some cases, GP practices may overlook individual support requirements, and that there may be insufficient systems in place to anticipate these. Whilst the demand on GP services and current infection measures in place are recognised, it is clear that face-to-face appointments do not work for every patient.

"I asked for a face-to-face appointment but was told to make my appointment online. I was given treatment following my online consultation but that did not work. I think if the doctor had seen me face-to-face they would have found it easier to diagnose me. I ended up getting private treatment."

Patient from Preston

Extended services and urgent care

Currently, there are two types of service which provide GP extended access services in Brent – the extra GP and nurse appointments provided in the evenings and weekends. There are currently five GP Access Hubs in Brent which operate by appointment only (booked through a patient's GP practice) or when a patient phones NHS 111. The service is only available to people who are registered with a GP in Brent. There is also one GP Access Centre located in Wembley, which is accessed by walk-in only and will see any patient whether they are registered in Brent or not. Referral to these services is largely dependent on the person who makes your appointment, for example, staff who are less tolerant of uncertainty or who perceive serious disease to be a more frequent event may refer more patients. In fact, 51% of Brent residents felt that it took too long to access care or receive advice when their GP practice was closed in 2020.⁵² There is also concern that patients are not aware that GP Access Hub

⁴⁸ NHS Digital (2019 & 2021), Appointments in General Practice

⁴⁹ Ibid

⁵⁰ NHS England (2021), Updated Standard Operating Procedure to Support the Restoration of General Practice Services

⁵¹ NHS England (2020), GP Patient Survey: Brent results

⁵² Ibid

are available outside of GP practice hours. This has been heard by respondents to the Task Group survey and, in January 2020, 26% of respondents to a Healthwatch Brent survey stated that they were unaware that their out-of-hours appointment was provided by a GP Access Hub.⁵³ Patients not knowing what out-of-hours services are available to them could negatively impact the care they receive, and could put pressure on A&E as well as other healthcare staff who may have to spend considerable time redirecting patients to appropriate health and social care services.

Brent Urgent Care Centre (UCC), based at Central Middlesex Hospital, is open 24 hours a day, seven days a week, and every week of the year. Its GP-led team offers urgent and immediate medical care when patients are unable to see their own GP and as an alternative to A&E without having to book an appointment. It is recognised that access to this service will vary, as what is deemed urgent may differ between individuals and clinicians. It has been heard that in recent months, the number of patients presenting to UCCs with a 'primary condition' has been high, and has largely returned to its pre-pandemic level. This may be as a result of difficulty in accessing GP appointments in some areas. There may also be other factors, such as a patient's proximity to a UCC or the deprivation of an area (with patients in high deprivation areas with limited access to resources to access self-care services such as pharmacies or the NHS App more likely to attend this setting). Indeed, the Task Group has heard that Brent UCC was utilised more in Stonebridge and Harlesden than any other area in Brent – the two highest areas of deprivation in the borough, and two areas of close proximity to Brent UCC.

Local commissioners explained that primary care is available through GP practices for general mental health needs, such as anxiety, depression, or post-traumatic stress disorders. A GP can then advise the patient with general self-help materials, refer them to counselling and prescribe medication. According to a Mind survey, two in five (40%) of all GP appointments in 2018 involved mental health issues.⁵⁴ While the situation is often complex, there is also an established pathway for referral to secondary care should a patient present to a GP practice in mental health crisis. Brent's Single Point of Access (SPA) provides a referral point, 24/7, to secondary mental health services for emergency, urgent and routine referrals. If deemed an emergency situation, an emergency response team would arrive to assess the patient and decide whether the patient is transferred to an acute bed or given treatment at home. Inconsistent decision-making can result in delays to access and the individual's care and treatment. It has been heard that these delays can result in the patient becoming more distressed and unwell, as well as increasing the potential risk to GP staff and other patients. However, it is important to consider the difficult considerations a GP may have in dealing with a patient in crisis, such as patient and staff safety, infection control measures, the different ways that patients may present and the time it takes for an emergency response team to arrive.

⁵³ Healthwatch Brent (2020), GP access hub appointments in Brent

⁵⁴ Mind (2018), 40 per cent of all GP appointments about mental health

Recommendation 3

Brent PCNs adopt a GP access and treatment standard that all GP practices sign up to and are accountable to. The standard should describe what services are available and what patients can expect from them. All patient participation groups (PPGs) should be involved in setting this standard, and PPGs should be regularly updated on the performance of the standard.

The Task Group has found that the ease with which patients access GP services varies across practices, and their experience of services varies too. An access and treatment standard will ensure that Brent residents experience consistently high levels of service in access and treatment when they need them, and in a way that suits their needs. The Brent standard should build on best practice of other local areas, and Brent Council should promote the standard across the West London Alliance.

The Task Group has identified the following access and treatment standards based on the experience of patients, which should be used a minimum:

- i. Reception and telephone access for all patient needs during opening hours
- ii. Agreed arrangements for evening and weekend access communicated to patients
- iii. Reception telephone answered within a maximum time frame or call back facility available (subject to the move to cloud based telephony systems)
- iv. Appointment and prescription requests addressed within a maximum time frame – regardless of whether request is made via telephone, online or in person
- v. Patients make one call only to make an appointment during core hours (subject to the move to cloud based telephony systems)
- vi. Appropriately trained clinicians should be involved in all stages of the triage process
- vii. Patients updated on all further action taken in respect of requests, appointments and/or treatments where these are carried out by the practice
- viii. Referrals to secondary care are clinically appropriate and in accordance with any agreed clinical pathways and referral protocols – patients are updated at each stage of the referral
- ix. For rapid access - conversation with registered clinician within fixed period in advance; emergency and urgent needs triaged within four hours. Practices clearly set out the process for routine, rapid and emergency access by agreement with NHS 111 and PPGs – this should be made clear on practice websites
- x. Flexible appointment types should be offered and booked in line with clinical need and patient's preference, including face-to-face, telephone, remote/digital and home visits – the range of appointment types should be made clear on practice websites
- xi. Bookings available to patients up to four weeks in advance for routine care and patients are made aware of process for cancelling and rebooking routine care appointments
- xii. Registration at any GP practice, where this is possible with no requirement for address, immigration status, identification or NHS number – with digital and face-to-face registration options for new patients
- xiii. Patients have their digital literacy and access to digital devices recorded on their patient file and taken into account when treatment is given
- xiv. Consent for digital communication and services and recorded in patient file
- xv. Guidance on online consultation service and digital communication communicated on practice website in easy to use language
- xvi. Patients to be able to communicate with GP practice via online consultation system and secure online messaging
- xvii. Each practice works towards developing consultant nurse practitioner and prescriber skills
- xviii. Non-clinical staff should be available at each GP practice e.g. social prescribers – availability made clear on practice websites
- xix. Treatment plans for all patient care agreed with and shared with patients
- xx. Prescription medicines issued where clinically effective and cost-effective, ensuring patients are engaged in the process at each stage by their clinical team
- xxi. Newly registered patients should receive information on GP practice and NHS England complaints procedures, as well as local complaints and advocacy services

Recommendation 4

Brent PCNs widely communicate the GP access and treatment standard and information on patients' rights to access and treatment including registration, appointments and prescriptions.

The Task Group has found that some patients were unaware of their rights to access GP services, the various GP services available to them, the clinical and social teams at a practice and the ways in which they are delivered. It is recommended that Brent PCNs communicate the GP access and treatment standard, as well as information on patients' rights concerning access and treatment including registration, appointments and prescriptions to ensure they have a clear understanding of what to expect from general practice. Brent PCNs should also measure and communicate the delivery of the standard, for example through the annual GP patient survey, practice websites and PPG meetings.

Recommendation 5

Brent PCNs develop an action plan to ensure that patient participation groups (PPGs) are supported to be actively involved in improving GP services. Brent PCNs should report progress against the action plan to Brent ICP and Brent Community and Wellbeing Scrutiny Committee.

The Task Group is keen to ensure that practice PPGs are well resourced, representative of the practice population, have input from relevant health and voluntary professionals and are actively involved in service improvement. Brent PCNs should also set up PCN-wide PPGs that are representative of the geographical area they cover and actively involve patients in designing future service delivery. Brent ICS and Brent Community and Wellbeing Scrutiny Committee should ensure that the action plan is delivered by monitoring the effectiveness of PPGs, and Brent ICS should report to Brent Health and Wellbeing Board on PPG performance. Where appropriate, PPG representatives should be co-opted onto the Community and Wellbeing Scrutiny Committee and/or its Task Groups and consideration should be given to formalising links with Healthwatch Brent.

Recommendation 6

Brent PCNs demonstrate that the configuration of their services does not disadvantage patients based on where they live.

The Task Group is concerned that the current arrangement of GP services in local areas may disadvantage some patients based on where they live. It is recommended that Brent PCNs consider ensuring that their configuration recognises pre-existing localities such as the five Brent Connects footprints. This should facilitate more geographically accessible services for patients and more effective integrated working between PCNs and statutory health and care partners. PCNs should consult statutory health and care partners on any proposal to change the configuration of a PCN, and if a change is made the rationale for doing so should be communicated to registered practice patients.

Barriers to accessing GP services

Language

Brent is one of the most linguistically diverse areas in the country, with around 150 different languages used. In 2011, 37% of the Brent population used a main language other than English, which is the second highest in England after Newham (41%). While the majority using other languages are also highly proficient in English, around 9% of adults in Brent could not speak English well, or at all. Proficiency in English was related to both age and gender: older women typically had poorer levels of proficiency in English.⁵⁵

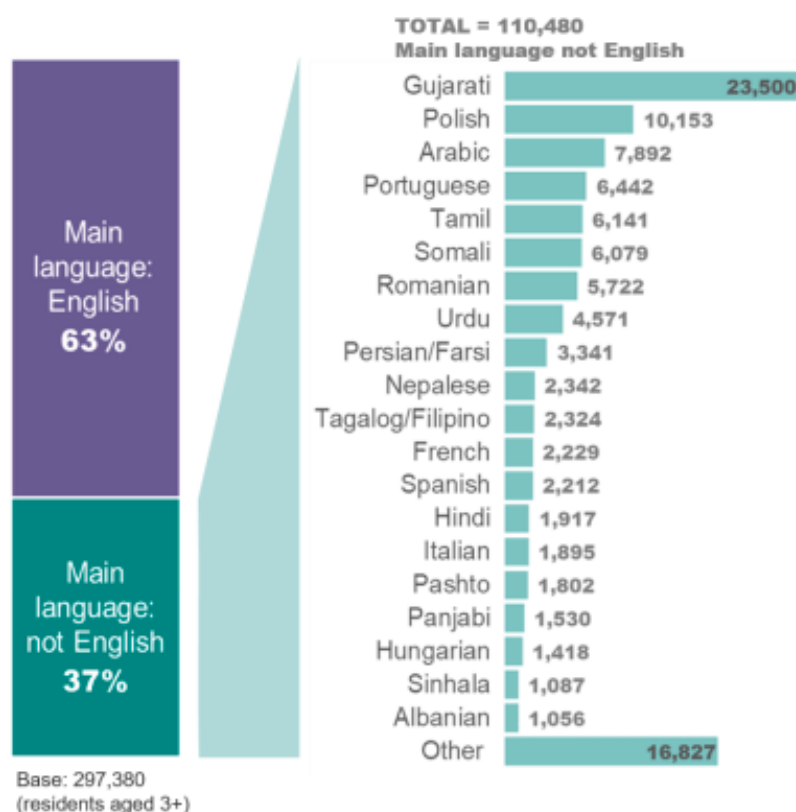


Figure 10: Residents by main language, Brent 2011⁵⁶

Deaf patients are specifically entitled to British Sign Language (BSL) interpreters to ensure they can receive and understand information about their care and communicate with practitioners. While patients who do not speak English or have English as a second language and require extra support are not legally obliged to receive it, NHS England guidance states that patients should be able to access primary care services in a way that ensures their language and communication requirements do not prevent them receiving the same quality of healthcare as others.⁵⁷

⁵⁵ Brent Council and Brent Clinical Commissioning Group (2019), Joint Strategic Needs Assessment: Migrants and Refugees

⁵⁶ Ibid

⁵⁷ NHS England (2018), Interpreting and Translation Services in Primary Care

Residents who do not speak English as their first language expressed concern that language barriers can lead to miscommunication between clinicians and patients, which can decrease the quality of care given. Whereas interpreters can usually be present during a face-to-face appointment, remote booking systems and telephone consultations present a more significant challenge for those that do not speak English. People with limited English proficiency, especially the elderly, tend to rely on body language and facial expressions to communicate with their doctors during face-to-face appointments, making remote appointments difficult. People with language barriers often depend on family to translate their issues during consultations, which can be an issue when sharing private medical information and can put people off contacting their GP practice. As most online information is in English, people with language barriers, including those who use British Sign Language, find it hard to understand. For example, trying to book or confirm an appointment on an English-based online consultation platform, such as eConsult, can be a problem and can prevent patients from accessing care.

“We can’t express our medical issues over the phone because English isn’t our first language. We can’t demonstrate our concern in the same way.”

Patient from Wembley

“I have to use e-consult for my grandparents because they do not speak English. Once an appointment I made I need to make sure I’m around for most of that day because the appointment slots are so wide.”

Patient from Harlesden

Disability and long-term conditions

Around one in seven Brent residents (14%) have a long-term health problem or disability that limits their day-to-day activities – either a little (7%) or a lot (7%). Those who regularly use GP services are more likely to have a disability or long-term condition - of those who responded to the Task Group survey, 33% had a disability. The prevalence of disability and poor health rises sharply with age: 83% of residents aged 85 or over had a long-term health problem or disability compared with 3% of children. Of all those aged 65 and over, more than half (54%) had a long-term health problem or disability. The prevalence of disability in Brent and London is lower than nationally (20%), reflecting the fact that the population in London has a younger age profile.⁵⁸

Nationally, 2.2% of the population have a learning disability. In Brent, this equates to approximately 7,000 people when applied to census population estimates. As of 2017 approximately 3,300 adults were registered as diagnosed with a learning disability with Brent CCG and 640 are known to Brent Council as users of statutory funded services to meet their Care Act eligible needs.⁵⁹ The number of children and young people with Special Educational Needs and Disabilities (SEND) is relatively high and continuing to rise, with 3.9% of children

⁵⁸ Brent Council (2020), Equality Profile of Brent

⁵⁹ Brent Council and Brent Clinical Commissioning Group (2017), Brent Joint Learning Disability Strategy 2017-20

who attend school having an education, health and care plan (EHC), compared to 3.7% nationally.⁶⁰

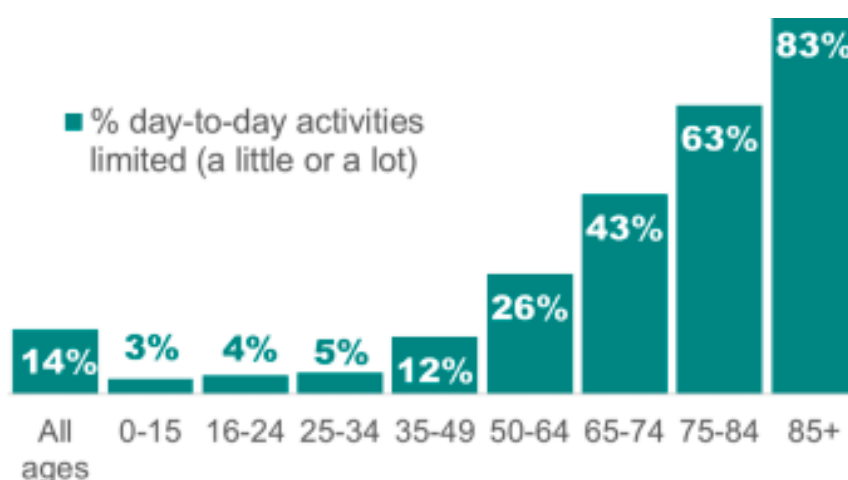


Figure 11: Long-term disability or health problem by age, Brent 2011⁶¹

It is estimated that 4,300 disabled residents in Brent are offline. Disabled internet users are less likely to access public services online than non-disabled internet users – 37% vs 43% nationally. This gap varies among people with different impairments: it is largest for visually impaired people (27% vs 43%), while hearing-impaired people are as likely as non-disabled people to use the internet to access public services (44% vs 43%).⁶² The Task Group has heard that some people with a learning disability did not have digital access or were unable to use technology without support or a carer present. Some people with sight impairments were unable to read instructions unless they were in Braille, and those with hearing impairments may struggle to make or attend appointments via telephone. There is concern that this can make some people reluctant to contact their GP practice via telephone or online, and as a result they may not access the care that they need.

Physical disabilities can also be a barrier to accessing digital or remote healthcare. For example, people with disabilities affecting their arms may not be able to use a computer or telephone screen. Holding the telephone for a long time to get through to a GP practice can also be difficult. Some people who responded to the Task Group survey were unaware that their GP practice may offer home visits – suggesting that some disabled patients and their carers did not have access to home visits either due to a lack of communication or because their GP practice were not offering them at the time. There is concern that for many disabled people the alternatives are not always appropriate.

Some disabled residents have said that prior to the Covid-19 pandemic they found it difficult to book same-day appointments if their GP practice required them to physically attend the surgery and queue in the morning. Similarly, people with paid carers were only able to attend appointments at certain times of the day, but this did not always match with the times available for same-day appointments. Therefore, some disabled people, especially those with mobility issues, have found that remote or digital healthcare has made it easier for them to access GP services and to avoid difficult trips to their practice.

⁶⁰ Office for National Statistics (2021), 'Special educational needs in England: January 2021'

⁶¹ Brent Council (2020), Equality Profile of Brent

⁶² Citizens Online (2020), Digital Inclusion in Brent

"I can't get an appointment. I struggle with technology and making an appointment via telephone is difficult for me – I have a hearing impairment and have to wear a hearing aid."

Patient from Wembley

"My surgery is not accessible for disabled people like myself. Due to my disability, I also find it difficult to make appointments online and the wait to get through on the telephone is just too long. I find it difficult to contact my GP practice."

Patient from Willesden Green

Deprivation

Brent has high levels of poverty and deprivation. One in three households in Brent live in poverty - compared to one in five in England. This is the sixth highest rate in London and the highest in outer London. Of Brent's 34 neighbourhoods, 15 are in the top 10% nationally for poverty rates. There are particular concentrations of poverty in areas such as Harlesden and Stonebridge. Poverty rates are particularly high for young people in Brent - one study has found that for every five children in Brent, two will be in poverty.⁶³ The local economic consequences of the pandemic are set to be significant too - Brent had the second highest proportion of its working age population on furlough during the pandemic.⁶⁴

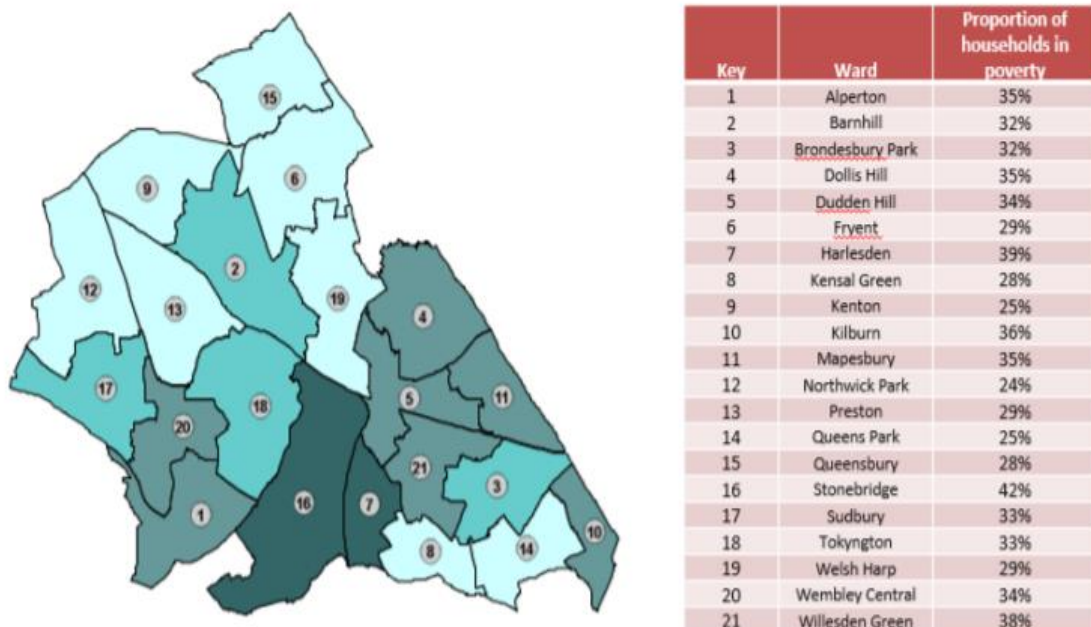


Figure 12: Brent households in poverty by middle layer super output areas⁶⁵

⁶³ Brent Council (2020), A Fairer Future: Ending Poverty in Brent

⁶⁴ Ibid

⁶⁵ Ibid

Residents on lower incomes have said that they are less likely to have digital skills and therefore may struggle to access digital or remote GP services. Nationally, only 25% of people earning under £11,499 per year have skills in each of the five essential digital skills groups (communicating, handling information and content, transacting, problem solving and being safe and legal online), compared to 61% of people earning over £25,000. Furthermore, people on lower incomes are less likely to be able to afford digital devices, and are therefore more likely to be digitally excluded - between 34,000 and 98,000 adults in Brent lack access to one or more digital devices (between 13% and 37% of the adult population).⁶⁶ In fact, Harlesden, Stonebridge and Dollis Hill were all included in the 10% of wards nationwide most at risk to digital exclusion – three of the most deprived wards in Brent.⁶⁷

Some people on lower incomes may be unable to afford the extra charge of a broadband contract, or some may opt for devices with more basic features which may prevent them from using certain healthcare applications. Access to the internet is not the only barrier – it can also be difficult for people to afford to call their GPs using a telephone if they are on a pay-as-you-go contract or a contract with limited call allowances, and people may be put off by the cost of long waiting times to get through to their GP practice. It has also been heard that people on cheaper internet deals may have poor connection and slow internet speed, making remote or digital consultation difficult. This becomes more challenging for those with language barriers and in need of interpreter services when communicating with their GP online.

“I haven’t looked into using e-consult. I don’t have the money to afford a device to use it, nor the digital skills or confidence to navigate it.”

Patient from Stonebridge

Age

Like other boroughs in London, Brent has a relatively young population. The median age of the population is 36, four years lower than the national average. Brent has proportionately fewer over 50s than England (30% vs. 38%), and more adults aged 25-44 (31% vs. 26%). Brent also has a higher proportion of children aged under ten compared with England (14% vs. 12%).⁶⁸ Between 2020-41, the number of residents aged 65 and over is projected to increase by 78% – an additional 33,000 older residents by 2041. In contrast, the child population is expected to see little change over the same period, increasing only marginally by 1%.⁶⁹

⁶⁶ Citizens Online (2020), Digital Inclusion in Brent

⁶⁷ Ibid

⁶⁸ Brent Council (2021), Population Change in Brent

⁶⁹ Ibid

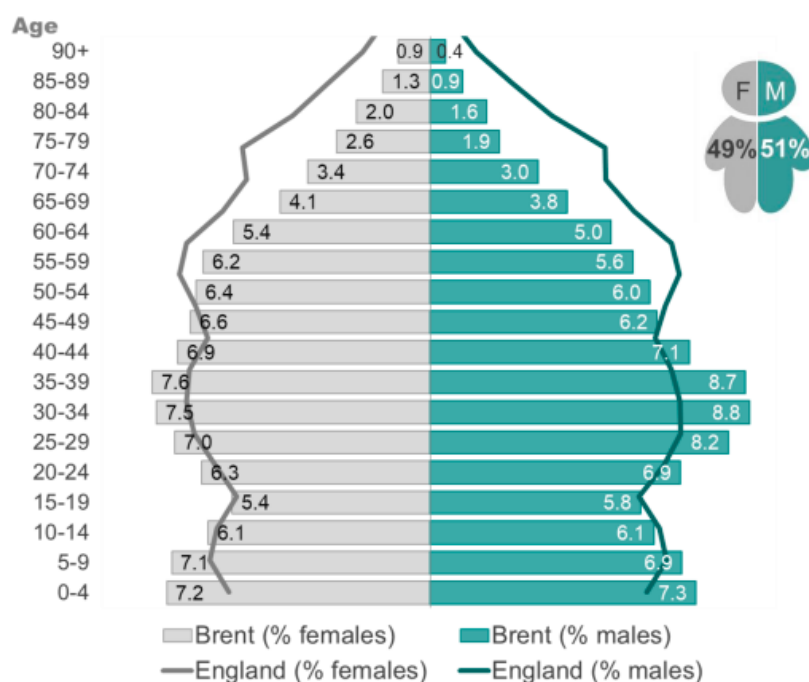


Figure 13: Population by age and gender, Brent and England 2020⁷⁰

Older people are more likely to be digitally excluded – to be offline, to lack digital skills and to be less likely to have access to digital devices. Nationally, 33% of people aged over 65 have not been online in the last three months. The majority of these (86%, or 29% of all people aged over 65) have never been online.⁷¹ Of those who responded to the Task Group survey and had not used eConsult, 18% were over the age of 64. There may be number of reasons for this, including a lack of knowledge, cost and security concerns. It has been heard that some elderly patients are more comfortable depending on family to help them access digital or remote healthcare services, but this has not been possible for some who may be isolating due to the Covid-19 pandemic and cannot meet their family. There is concern that a lack of alternatives to remote or online consultations may mean that they do not receive vital healthcare. However, it should be noted that some elderly patients do feel comfortable using digital devices. The Task Group has heard that some elderly patients find online platforms such as eConsult useful in managing long-term conditions – especially in accessing routine care, medical reviews and prescriptions.

“My elderly mother struggled to get through to her GP practice on the telephone. She had to wait a long time and wasn’t called back within the time frame given to her. She doesn’t have access to any technology and doesn’t have the digital skills to use online services so her options are limited.”

Patient from Tokyngton

⁷⁰ Ibid

⁷¹ Citizens Online (2020), Digital Inclusion in Brent

Some young people have said that they find it difficult to make appointments with their GP. Once children reach the age of 16, they can agree to examination and treatment just like adults, and GP practices do not need to seek parental consent to see them. However, Brent Youth Parliament has told the Task Group that contacting a GP practice was daunting for some young people. Some felt that GP staff were not always empathetic towards the issues that young people present with, such as mental health concerns, and others felt altogether unimportant to their GP. Generally, it was felt that GP practices were unwelcoming for young people and that staff sometimes failed to ease any concerns that they may have prior to attending an appointment. Anecdotal evidence has also been heard from some parents with young children that they are being turned away from GP practices, and are instead reverting to NHS 111 or even presenting at A&E. There is concern that practices are refusing to see children with flu-like symptoms such as a cough, runny nose and fever, even if they are Covid-19 negative. It is important to note that some children and young people (especially those with long-term conditions) are regular users of GP services. Asthma is the most common long-term condition in childhood nationally – in Brent, there were 168 emergency admissions of children (under 10 years) due to asthma in 2019/20. Indeed, this is higher than the average rate for England, which lied at 161.⁷²

“My GP practice refused to see my infant child because she had a cough and a fever. We were told to present at A&E instead.”

Patient from Wembley

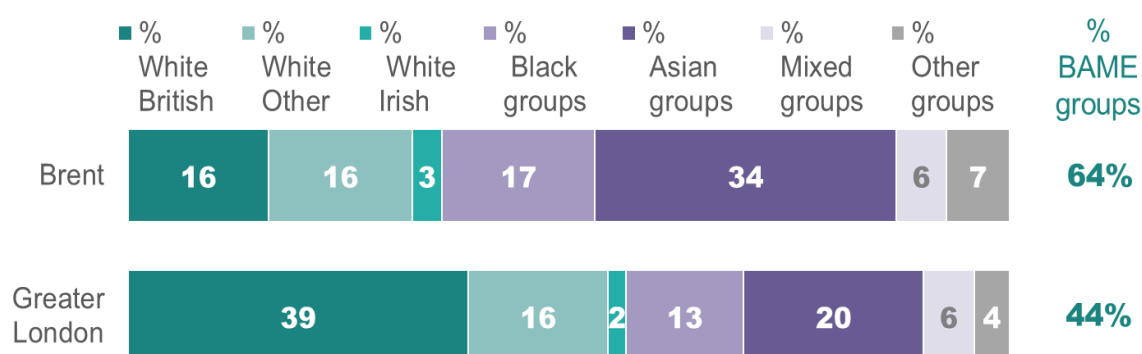
Ethnicity and country of birth

Brent is one of the most diverse boroughs in London. In Brent, almost two thirds of the population are from minority ethnic groups, the third highest in London behind Newham and Redbridge. A further 19% of residents are from White minority groups, and the remaining 16% are White British, the second lowest rate in London after Newham. It has a large Asian population: one third of its residents are from Asian groups compared to 20% across London. Around 18% of residents are from Black ethnic groups, higher than the London average (13%). It is estimated that around 16% of the Brent population are from ‘White Other’ groups – up from 14% in 2011. Around three quarters of this ethnic group were from countries in Eastern and Western Europe in 2011.⁷³

⁷² Public Health England (2021), Child Health Profiles

⁷³ Brent Council (2021), Community Profiling: Diversity in Brent

Figure 14: Population by ethnicity, Brent and London 2020⁷⁴



Brent attracts residents from all over the world. In 2011, over half (55%) of the Brent population were born outside the UK – the highest percentage in England and Wales. The 2011 Census identified Brent residents born in 215 different countries. The top countries of origin included: India, Poland, Ireland, Sri Lanka, Kenya, Jamaica, Somali, Pakistan, Romania and Iraq. In 2011.⁷⁵

While there is little data on the levels of asylum seekers and refugees in Brent, the number is thought to be considerable. Brent Council offered to home 52 Syrian refugees under the Vulnerable Person Resettlement Scheme between March 2017 and June 2019, including 25 children. 306 unaccompanied asylum-seeking children came to Brent between 2017 and 2019. More than half of Brent's unaccompanied asylum seeking children came from two countries: Afghanistan and Albania.⁷⁶

Some residents have said that GP practices in Brent are not providing undocumented migrants, refugees and asylum seekers with the necessary support to register with a GP practice, or are not allowing them to register altogether. An investigation by the Bureau of Investigative Journalism (BIJ) in 2021 found that undocumented migrants without proof of address or ID were being refused registration with GP surgeries in Brent. It contacted 19 surgeries posing as a migrant's friend – four would not respond to the enquiry at all, and a further 12 refused to register an undocumented prospective patient.⁷⁷ The Task Group has also heard about the difficulties refugees and asylum seekers have found in registering with a GP practice - some were unaware of their right to register with a GP practice, which led to delayed access to free NHS prescriptions and dental care. It also affects the effectiveness of

⁷⁴ Ibid

⁷⁵ Ibid

⁷⁶ Brent Council and Brent Clinical Commissioning Group (2019), Joint Strategic Needs Assessment: Migrants and Refugees

⁷⁷ Kilburn Times (2021), Undocumented migrants in Brent denied access to GPs

the Covid-19 vaccination programme, as people will only be contacted to arrange a vaccination appointment if they are registered with a GP practice.

“Many of the asylum seekers and refugees I work with are unaware of their rights to access primary care. This makes receiving any treatment a lengthy process, as we have to support them to navigate the registration process and to book an appointment. Only then can they get the treatment they need.”

Refugee Resettlement Officer based in Stonebridge

Recommendation 7

Brent PCNs implement a SMART action plan to reduce the barriers experienced by patients when accessing GP services, with a focus on deprivation, ethnicity, disability and other protected characteristics. Brent PCNs should report progress against the action plan to Brent ICP and Brent Community and Wellbeing Scrutiny Committee.

The Task Group has repeatedly found that some groups of patients experience significant barriers and unequal access to GP services, including patients on persistent low incomes, those with a disability, some older patients, patients whose first language is not English, some children and young people, refugees and asylum seekers and those who cannot access digital technology. It is recommended that a SMART action plan is developed to advance equality of access between people who share a protected characteristic and those who do not (with consideration for the Equality Act 2010), and that the actions identified are incorporated into the access treatment standard.

Recommendation 8

Brent ICP should work alongside Brent Children’s Trust to conduct further research into the experience of children and young people in accessing GP services and take any action as identified.

The Task Group has concern that some parents with young children and children and young people themselves are having difficulty accessing GP services, especially in accessing mental health support and rapid access to primary care for infants and young children with childhood illness. As such, there is an urgent need to quantify the service offer for children and young people. It is recommended that Brent ICP works alongside Brent Children’s Trust to commission necessary expertise to conduct further research on this matter, and that the findings inform an update of the actions identified in the SMART action plan to address the barriers to access and deliver the GP access and treatment standard.

Appendices

Appendix A Participants

The task group would like to thank the following participants who contributed to the report and/or took part in evidence sessions held between 26 May 2021 and 11 November 2021:

- Fana Hussain, Interim Brent Borough Director, North West London Clinical Commissioning Group
- Dr Madhuker C Patel, Brent Borough Lead, North West London Clinical Commissioning Group
- Jonathan Turner, Brent Borough Director, North West London Clinical Commissioning Group
- Councillor Harbi Farah, Lead Member for Adult Social Care, Brent Council
- John Licorish, Public Health Consultant, Brent Council
- Sheik Auladin, Managing Director, North West London Clinical Commissioning Group
- Councillor Neil Nerva, Lead Member for Public Health, Culture and Leisure, Brent Council
- Dr Sachin Patel, Clinical Lead, North West London Clinical Commissioning Group
- Jon Baker, Deputy Medical Director, London North West Healthcare NHS Trust
- Norrita Labastide, Divisional Manager, London North West Healthcare NHS Trust
- Patrick Brooke, Director of Totally Urgent Care, London North West Healthcare NHS Trust
- Jo Kay, Manager, Healthwatch Brent
- Isha Coombes, Programme Director, Brent Integrated Care and Community Services
- Dr Jahan Mahmoodi, General Practitioner, Hazeldene Medical Centre
- Behtenie Woolfson, Area Inspection Manager, Care Quality Commission
- Dr Ishani Patel, Clinical Lead, North West London Digital Accelerator
- Rehena Ramesh, Digital Lead, Brent Council
- Madeleine Leathley, Digital Workstream Lead, Brent Council
- Kemi Akanle, Clinical Director for Brent Mental Health Services, Central and North West London NHS Foundation Trust
- Michelle Reilly, Practice Manager, Lonsdale Surgery
- Dr Sana Rabbani, General Practitioner, Freuchen Practice
- Karen McCartney, Practice Nurse, The Surgery
- Dr Mohammed Haidar, General Practitioner, The Wembley Practice
- Sarah Nyandoro, Head of Joint Commissioning for Mental Health, Learning Disability and Autism, North West London Clinical Commissioning Group
- Philippa Galligan, Borough Director for Brent Mental Health Services, Central and North West London NHS Foundation Trust
- Zena Kazeme, Refugee Resettlement Officer, Sufra North West London
- Kenechi Ezeajughi, Chair of Brent Youth Parliament

The Task Group would also like to thank all residents who took part in the survey on their experiences of access to GP services in Brent since March 2021. It has been valuable to hear directly from patients with experience of accessing general practice in Brent.

The Task Group has been impressed by the knowledge and insight of all stakeholders and expert witnesses involved, and thanks them for their contribution to a shared vision of GP access across Brent in which no patient is left behind.

Appendix B

Evidence Sessions

	Themes and Areas for Discussion
Evidence Session 1 26 May 2021	Demand and Access for Primary Care GP Services GP and Out of Hours Provision in Brent Health Inequalities Primary Care Workforce and Capacity
Evidence Session 2 9 June 2021	Quality Standards GP Access and Deprivation, Deprivation GP Primary Care and Health Inequalities Cultural Communities GP Primary Care and Health
Evidence Session 3 24 June 2021	Understanding Digital Exclusion in Brent Digital GP Access and Health Inequalities Digital Local Offer for GP Primary Care
Evidence Session 4 15 July 2021	General Practice Teams and Primary Care Services Supporting Patients to Access GP Primary Care General Practice Workforce and the Digital Offer
Evidence Session 5 20 October 2021	Vision for Primary Care in Brent Pathways from GP Services to Mental Health Services GP Practice Contingency Planning
Evidence Session 5a 27 October 2021	Vision for Primary Care in Brent
Evidence Session 6 11 November 2021	Accessibility of GP Mental Health Services Pathways from GP Services to Mental Health Services

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Appendix D

Glossary of Terms

- A&E: Accident and Emergency
- CCG: Clinical Commissioning Group
- GP: General Practitioner
- GP Access Hub: GP practice offering evening and weekend appointments for patients registered with other practices in the area, providing access to primary care out of normal GP practice opening times.
- NHS: National Health Service
- NHSE: NHS England
- ICS: Integrated Care System
- ICP: Integrated Care Partnership
- NWL: North West London
- Primary Care: Primary care is the day-to-day healthcare given by a health care provider. Typically, this provider acts as the first contact and principal point of continuing care for patients within a healthcare system, and coordinates other specialist care that the patient may need. Patients can access primary care services through their local general practice, community pharmacy, optometrist, dental surgery and community hearing care providers.
- PCN: Primary Care Network
- PPG: Patient Participant Group
- UCC: Urgent Care Centre

Appendix E


NHS GP contract explained

Every individual or partnership of GPs must hold an NHS GP contract to run an NHS-commissioned general practice. These set out mandatory requirements and services for all general practices, as well making provisions for several types of other services that practices may also provide. There are three different types of GP contract arrangements used by NHS

commissioners in England – General Medical Services (GMS), Personal Medical Services (PMS) and Alternative Provider Medical Services (APMS). All types of contract are managed by the NHS commissioner (either NHS England or a local CCG).

The GMS contract is the national standard GP contract. This contract is negotiated nationally every year between NHS England and the General Practice Committee of the British Medical Association, the trade union representative of GPs in England. It is then used by either NHS England and/or CCGs (depending on delegated powers) to contract local general practices in an area. The PMS contract is another form of core contract but unlike the GMS contract, is negotiated and agreed locally by CCGs or NHS England with a general practice or practices. This contract offers commissioners an alternative route with more flexibility to tailor requirements to local need while also keeping within national guidelines and legislation. The APMS contract offers greater flexibility than the other two contract types. The APMS framework allows contracts with organisations (such as private companies or third sector providers) other than general practitioners/partnerships of GPs to provide primary care services. APMS contracts can also be used to commission other types of primary care service, beyond that of 'core' general practice.

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 Brent	Cabinet 11 th April 2022
	Report from the Strategic Director, Community Well Being
Acquisition of Affordable Housing at Neville & Winterleys	

Wards Affected:	Kilburn
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>	Part Exempt – Appendix 1 is exempt as it contains the following category of exempt information as specified in Paragraph 3, Schedule 12A of the Local Government Act 1972, namely: “Information relating to the financial or business affairs of any particular person (including the authority holding that information)”
No. of Appendices:	One Appendix 1: (Exempt) Preferred Bidders Offer
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Hakeem Osinaike Operational Director of Housing 020 8937 2023 Hakeem.Osinaike@brent.gov.uk Patricia Gillis Head of Affordable Housing & Partnerships 020 8937 2096 Patricia.Gillis@brent.gov.uk

1. Purpose of the Report

- 1.1. This report seeks permission to purchase 101 affordable housing units forming part of the 1 – 8 Neville House, 1 – 64 Winterleys, 113 - 128 Carlton House and Carlton Hall (“NWCC”) housing site forming part of the South Kilburn Regeneration Programme from the developer partner when appointed.

- 1.2. The preferred bidder to be appointed development partner for the NWCC site has bid the purchase price as set out in Appendix 1 (the “Purchase Price”) for the purchase of the 101 affordable units, as part of the tender process.

2. Recommendation(s)

That Cabinet:

- 2.1. Approve the proposed acquisition of the 101 affordable units for the purchase price detailed in Appendix 1 from the Preferred Bidder, subject to it being selected as the developer partner for the NWCC site, on the basis of receipt of GLA funding as detailed in paragraph 3.6 and with the remaining balance to be funded from the capital programme.
- 2.2. Delegate authority to the Strategic Director of Community Wellbeing in consultation with the Lead Member for Housing to negotiate and agree the terms and thereafter enter into a development and sale and purchase agreement with the Preferred Bidder for the purchase of the 101 affordable units, and thereafter make any variation to the contract if required.

3. Detail

- 3.1. The proposed affordable housing will form part of the South Kilburn regeneration programme, which was last reported to Cabinet on 17 August 2020. It was agreed at this meeting that Brent Housing Management would, in future regeneration developments be given first choice as being the preferred provider of the Social Housing elements. Previously Housing Associations were encouraged to partner with the tender approved developers and manage the affordable housing. NWCC is the first development to come forward in this way.
- 3.2. The option for the Council, through Brent Housing, to be the housing provider was therefore included in the tender documents which were provided to developers and the Preferred Bidder as detailed in Appendix 1 has taken up this option.
- 3.3. The developers were asked to review their mix of units to ensure a greater number of family size units were achieved.
- 3.4. The Preferred Bidder’s mix is as detailed within Appendix 1.
- 3.5. The Operational Director of Housing has confirmed that the tenure mix detailed in Appendix 1 will meet the essential housing needs of households in South Kilburn and the location of the scheme benefits the overall South Kilburn regeneration.
- 3.6. The programme is based on a start on site date of September 2022; this is in line with the conditions for GLA Grant 16-21. The GLA have indicated that £100k per unit could be agreed and this would total £10,100,000.

4. Financial Implications

- 4.1. The Purchase Price bid for the social units is set out in Appendix 1.
- 4.2. There is £10.1m of GLA grant available based on a 100k per unit, to offset the purchase. This provides a payback to the council in 23 years and an NPV of £15.4m after 60 years, after annual income and expenditure streams including rent and maintenance are considered.
- 4.3. The GLA grant is based on grant conditions being fulfilled, including the developer starting onsite before the deadline. If the council does not receive the grant then the NPV reduces to £5.8m and the payback period increases to 49 years.
- 4.4. The appraisal assumes all 101 units will be let at South Kilburn social rents

5. Legal Implications

- 5.1. The purchase of the affordable units will be achieved under the terms of a development, sale and purchase agreement with a developer partner. The recommendation to purchase is subject to the Preferred Bidder being selected as the developer partner. The council has proposed to the Preferred Bidder that subject to its selection, this agreement must be entered into by 30 September 2022. If it is not then the Preferred Bidder (assuming that they are the developer partner) can then sell the affordable units to another registered provider.
- 5.2. The development, sale and purchase agreement will also contain all the appropriate development obligation from the developer partner in relation to the affordable homes. The council will have the right, inter alia, to include its specification for the affordable homes, its nomination agreement, details of the handover protocols and the defects liability and snagging procedures in the development, sales and purchase agreement. The freehold development, sales and purchase agreement will also include the council's specific delivery measures and set payment terms.
- 5.3. In relation to paragraph 3.5 of this report, part 6 of the Housing Act 1996 (as amended) governs the allocation of local authority housing stock in England. It was substantially amended, with effect from 31 January 2003, by the Homelessness Act 2002 and by the Localism Act 2011.
- 5.4. Local authorities are not under a duty to maintain a housing register but must have an allocation scheme for determining priorities between applicants for housing which sets out the procedure to be followed when allocating housing accommodation. The Council must have regard to their homelessness strategies, tenancy strategies and the London housing strategy (where appropriate), when preparing or modifying their housing allocation schemes.
- 5.5. Section 17 (1) (b) of the Housing Act 1985 provides for Acquisition of land for housing purposes and provides powers for the Council to acquire houses, or buildings which may be made suitable as houses, together with any land

occupied with the houses or buildings, Subsection (3) of the Housing Act 1985 provides that Land may be acquired by a local housing authority by agreement.

- 5.6. The occupiers of the units will be secure tenants provided the conditions are met pursuant to sections 79, 80 and 81 of the Housing Act 1985. Accordingly the tenant may exercise its Right to Buy the unit pursuant to part V of the Housing Act 1985

6. Diversity Implications

- 6.1. The public sector equality duty, as set out in section 149 of the Equality Act 2010, requires the Council, when exercising its functions, to have “due regard” to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a “protected characteristic” and those who do not share that protected characteristic. The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 6.2. Having due regard involves the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.
- 6.3. There is no prescribed manner in which the Council must exercise its public sector equality duty but having an adequate evidence base for its decision is necessary.
- 6.4. The proposals in this report have been subject to screening and Officers believe there are no adverse equality implications.

7. Consultation with Ward Members and Stakeholders

- 7.1. As laid out in the Cabinet report of 17 August 2020.

Related Documents:

17th August 2020 Cabinet report from Strategic Director of Regeneration and Environment – South Kilburn Regeneration Programme

Report sign off:


Phil Porter

Strategic Director of Community Well Being.

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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	Cabinet 11 th April 2022
	Report from Strategic Director, Community Well Being
Purchase of 115 Affordable Homes in Alperton	

Wards Affected:	Alperton
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: Site Location Plan Appendix 2: Phase 2 Site Plan
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Hakeem Osinaike Operational Director of Housing 020 8937 2023 Hakeem.Osinaike@brent.gov.uk Tanveer Ghani Operational Director of Property & Assets 020 8937 1722 Tanveer.Ghani@brent.gov.uk

1.0 Purpose of the Report

- 1.1 This report seeks permission to purchase the long leasehold interest of a new-build residential block for a term of 999 years There is a total of 115 affordable rented homes (flats) within the block located at the Grand Union scheme on Beresford Way, Alperton, HA0 1NW, from St. George Development Ltd who is the freeholder and 'developer'.

- 1.2 The total budget required to purchase the 115 affordable homes including professional fees, disbursements and exclusive of Stamp Duty Land Tax is £30.27m.
- 1.3 The developer will grant the Council a 999-year lease at a peppercorn rent on completion of the contract for the 115 affordable homes. The developer will continue to insure the premises during the construction and until completion of the contract.

2.0 Recommendation(s)

That Cabinet:

- 2.1 Approve a budget of £30.27m to purchase the long leasehold interest in 115 affordable homes from the Grand Union scheme, subject to contract and subject to a) clean and marketable title b) financial and legal due diligence and c) vacant possession, with a target exchange of contract in May 2022.
- 2.2 Delegate authority to the Strategic Director of Regeneration & Environment in consultation with the Cabinet Member for Regeneration, Property and Planning, to negotiate and agree the terms and thereafter enter into a contract with the developer for the purchase of the scheme and make any necessary additional amendments required to the contract thereafter.
- 2.3 Note that the Strategic Director of Regeneration & Environment pursuant to powers delegated under Part 3 of the Constitution will procure and award various contracts for professional services relating to the construction supervision of the 115 homes that are to be purchased by Brent Council.

3.0 Detail

- 3.1 The Grand Union development will deliver up to 3,030 homes in the Alperton area. The planning application reference for this development is 18/0321, and it was granted planning permission in September 2018.
- 3.2 Under the section 106 agreement between the developer and the Council dated 28th September 2018, 35% of these homes will be affordable. This totals about 1,050 homes of which 30% (315) will be shared ownership and 70% (735) rented. The affordable rent will be capped at Local Housing Allowance (LHA).
- 3.3 In April 2020, Cabinet agreed to purchase 114 homes (92 x Affordable Rent and 22 x Shared Ownership) from Phase 1 of the Grand Union development. The 92 affordable rented homes are complete and have been handed over to Brent Council. The 22 x Shared Ownership units are currently in construction and will be handing over late 2022/early 2023.
- 3.4 The developer is now seeking a buyer for the 115 affordable homes, which are being sold as a package from Phase 2 of the Grand Union development. The purchase of these units is dependent on the variation to the section 106 agreement so that the future phases at Grand Union will provide for London

Affordable Rent (LAR). The breakdown of the 115 affordable homes is as follows:

Unit Type	Tenure Type	Total
1 Bed Flat	London Affordable Rent	32
2 Bed Flat	London Affordable Rent	52
3 Bed Flat	London Affordable Rent	31
Total		115

- 3.5 The Head of Housing Needs has confirmed that the size breakdown will meet the essential housing needs of households on the housing register and the location of the scheme will be beneficial.
- 3.6 Officers have approached the developer regarding the possibility of purchasing these homes. An agreement in principle has been reached on a purchase price of £28.7m via private treaty negotiation, which means an average of just under £250K for each home.
- 3.7 The target average development cost under the New Council Homes Programme (NCHP) is £280K per home. As such, at just under £250K per home, this purchase represents good value for money. It should be noted that the £30.27m budget request is made up of the £28.7m purchase price and professional fees/disbursements.

4.0 Grand Union Site

- 4.1 The Grand Union site is a former 22-acre industrial estate in the borough. Please refer to Appendix 1 for the Site Location Plan.
- 4.2 The site is bounded by Beresford Avenue to the north, the A406 to the east and the Grand Union canal to the south.
- 4.3 Bisected by the River Brent, the development is formed of two parcels of land – the northern parcel which forms the majority of the site and a smaller southern parcel. The scheme will be a mixed development, which will also include offices, a nursery, shops, cafes, bars and a community centre.
- 4.4 Grand Union will create a vibrant new canal-side neighbourhood. The development is expected to have 6 phases. Demolition commenced in May 2019 and the completion of the entire scheme is expected by 2038. Please refer to Appendix 2 for the Phase 2 Site Plan.

5.0 Financial Implications

- 5.1 The anticipated cost of the purchase is £30.27m including all the estimated acquisition costs. The analysis assumes the units will be let at London Affordable Rent (LAR) rates.

- 5.2 The Council will use the optimum combination of financing for the scheme including prudential borrowing and capital grants and contributions. It is expected the scheme will attract grant income from the GLA totalling £2m.
- 5.3 The payment arrangements to be agreed with developer will look to seek the most appropriate payment mechanism to achieve best value for the acquisition.
- 5.4 The financial appraisal undertaken indicates the scheme is financially viable.
- 5.5 The level of service charge for the maintenance of communal parts is subject to negotiation with the developer.
- 5.6 It has been assumed that the Council will receive 100% Stamp Duty Land Tax (SDLT) relief based on the assumption that:
- a) The Council is deemed to be a relevant housing provider that is controlled by its tenants; and
 - b) The application of GLA grant receipts meets the requirements of a qualifying public subsidy.

6.0 Legal Implications

- 6.1 Section 17 (1) (b) of the Housing Act 1985 provides for Acquisition of land for housing purposes and provides powers for the Council to acquire houses, or buildings which may be made suitable as houses, together with any land occupied with the houses or buildings, Subsection 17 (3) of the Housing Act 1985 provides that Land may be acquired by a local housing authority by agreement.
- 6.2 The Council will be purchasing affordable homes that will be rented to Council tenants. Section 79 of the Housing Act 1985 provides that the tenant of a council property will be a secure tenant provided that in accordance with section 81 of the Housing Act 1985 the dwelling is the tenants main or principal home. Accordingly, the provisions of the Housing Act will entitle the secure to purchase their home under the right to buy scheme.
- 6.3 The Council legal department will undertake all the necessary due diligence prior to exchange of contracts. Accordingly, all the necessary searches and Title information will be examined prior to entering into the contract to ensure that the Council will acquire the property with good and marketable title.
- 6.4 As detailed at Recommendation 2.3, various contracts for professional services relating to the construction supervision of the 115 homes will need to be procured. These are likely to be classed as Low or Medium Value Contracts under the Council's Contract Standing Orders. For both Low Value and Medium Value Contracts, the relevant Strategic and Operational Director has delegated authority to authorise the procurement of such contracts and award the contracts.

7.0 Equality Implications

- 7.1 The public sector equality duty, as set out in section 149 of the Equality Act 2010, requires the Council, when exercising its functions, to have “due regard” to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a “protected characteristic” and those who do not share that protected characteristic. The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 7.2 Having due regard involves the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.
- 7.3 There is no prescribed manner in which the Council must exercise its public sector equality duty but having an adequate evidence base for its decision is necessary. Officers believe there are no adverse equality implications as the 115 affordable homes are being purchased to meet the needs of households on the housing register.

8.0 Consultation with Ward Members and Stakeholders

- 8.1 This report will be circulated to all Ward Members.

9.0 Human Resources / Property Implications

- 9.1 There are no further property implications or human resources implications in relation to this report.

10.0 Public Services (Social Value) Act 2012

- 10.1 The Council is under duty pursuant to the Public Services (Social Value) Act 2012 (“the Social Value Act”) to consider how services being procured might improve the economic, social and environmental wellbeing of its area; how, in conducting the procurement process, the Council might act with a view to securing that improvement; and whether the Council should undertake consultation. Officers will have regard to considerations contained in the Social Value Act in relation to the proposed procurements of the various contracts for professional services referred to in Recommendation 2.3 and where appropriate, include reference to social value being 10% of the evaluation score.

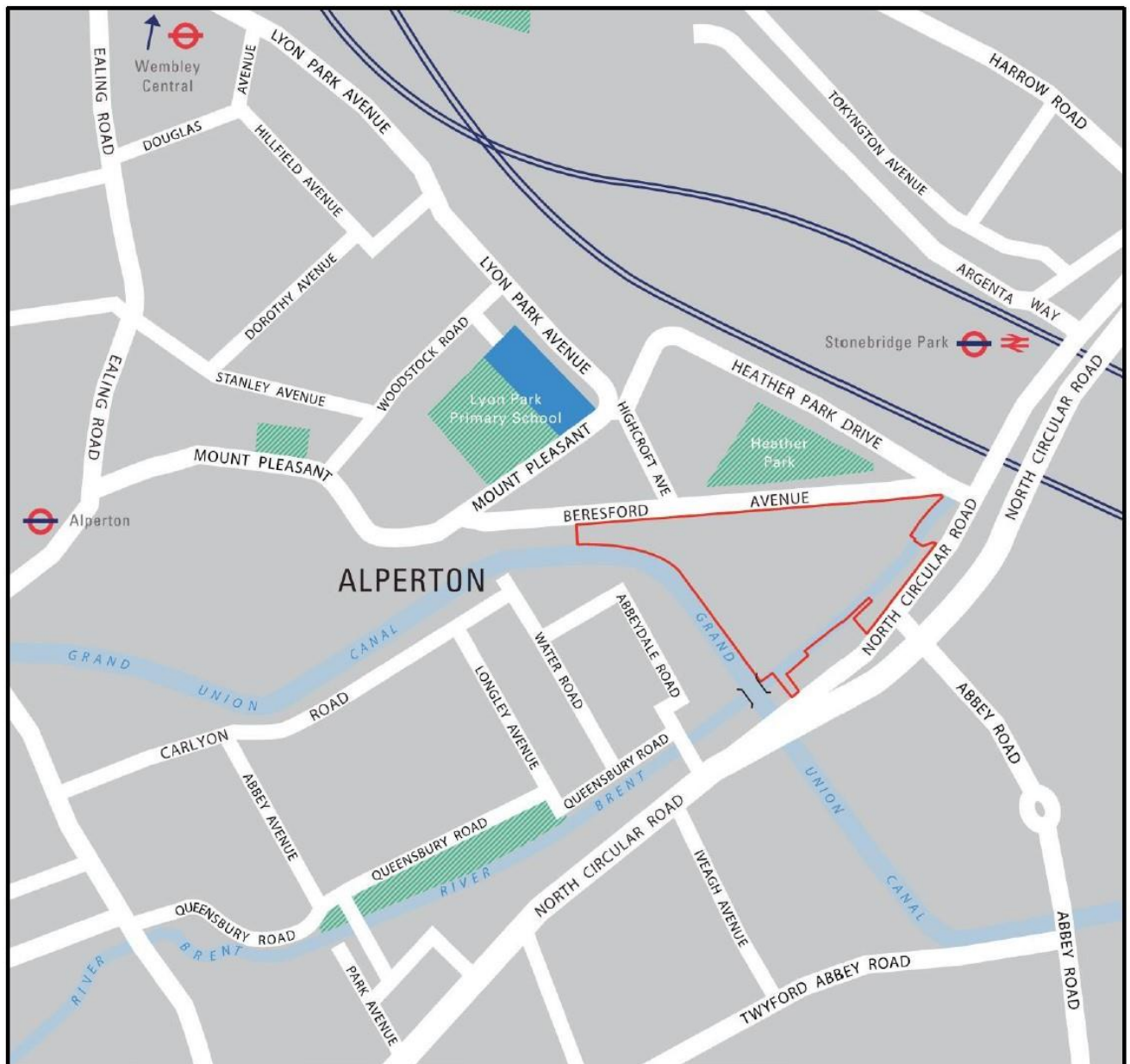
Report sign off:

Phil Porter

Strategic Director for Community Wellbeing

Appendix 1: Site Location Plan

Address Beresford Avenue, Wembley, HA0 1NW



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Grand Union Phase 2



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P01	07/05/20	Issued For Information

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PROJECT
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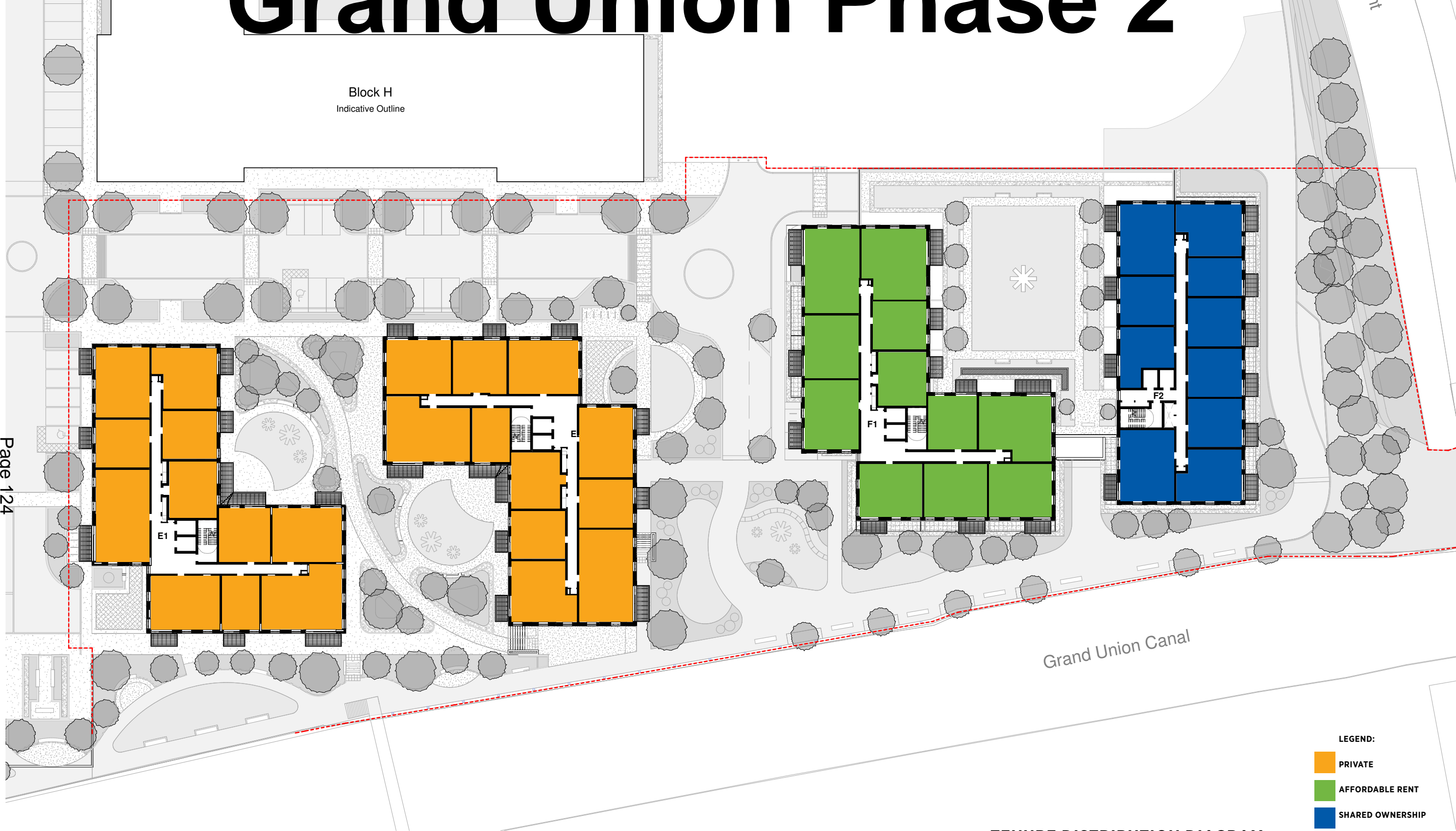
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1 : 1250	07/05/20	BL	NH	NH

Illustrative Masterplan

Stage 1

STATUS	PURPOSE FOR ISSUE	SR NO.
S2	Information	6469
DRAWING NO.	REV.	
NGU - SRO - ZZ - XX - DR - A - SK003	P01	

Grand Union Phase 2



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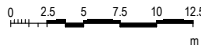
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SCALE@A1 DATE 09/23/19
PROJECT
Grand Union Phase 2A
General Arrangement Plot E & F
Typical Floor for diagram



Phase 2 Boundary - - - - -

STATUS PURPOSE FOR ISSUE
Information

SR NO. DRAWING NO. REV.
-SRO-BEF-05-DR- sk507

 Brent	Cabinet 11 th April 2022
	Report from the Strategic Director of Regeneration & Environment
Neasden Stations Growth Area Masterplan - Supplementary Planning Document	

Wards Affected:	Dollis Hill, Dudden Hill, Welsh Harp, 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: Neasden Stations Growth Area Final Consultation Report Appendix 2: Neasden Stations Growth Area Masterplan SPD
Background Papers:	Brent Local Plan https://www.brent.gov.uk/planning-and-building-control/planning-policy-and-guidance/draft-brent-local-plan
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Alice Lester, Operational Director Regeneration 020 8937 6441 Alice.Lester@brent.gov.uk Jonathan Kay, Head of Regeneration 020 8937 2348 Jonathan.Kay@brent.gov.uk Ciara Whelehan, Spatial Planning Manager 020 8937 6473 Ciara.Whelehan@brent.gov.uk

1.0 Purpose of the Report

- 1.1 Brent Council Cabinet on 14th June 2021 approved the draft Neasden Stations Growth Area Masterplan Supplementary Planning Document (SPD) for

publication and statutory consultation. This report sets out the results of the consultation feedback, officer considerations and recommended changes to the document. It seeks approval by Cabinet of the adoption of the amended Neasden Stations Growth Area Masterplan Supplementary Planning Document. Once adopted the Masterplan Supplementary Planning Document will have weight as a material consideration in the determination of planning applications.

2.0 Recommendation(s)

- 2.1 Cabinet consider the consultation report, responses, officer recommendations and proposed amendments to the draft Neasden Stations Growth Area Masterplan Supplementary Planning Document as set out in Appendix 1.
- 2.2 Cabinet approve the adoption of the Neasden Stations Growth Area Masterplan Supplementary Planning Document as set out in Appendix 2.

3.0 Detail

Background

- 3.1 Brent Full Council on 24th February 2022 approved the adoption of Brent's new Local Plan. The Plan sets out the vision and policies for development in the borough to 2041, including 23,250 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 new 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.
- 3.3 Officers developed the draft NSGA Masterplan SPD 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. The Masterplan SPD sets out the vision and objectives for transformational change of the area, the planning policy framework to which new development must comply and spatial analysis of the current state and land use of the area which provides the foundation for regeneration and growth. The Masterplan SPD sets a robust urban design framework comprising development, placemaking and environmental and sustainability principles, to ensure new development is coherent and

comprehensive, and creates a place where people choose to live, learn, work and relax, and adheres to environmental standards required for climate change resilience and transition to net zero carbon. Guidance is also provided regarding the planning process for new development schemes, as well as illustrative case studies of urban design best practice.

- 3.4 Brent Council Cabinet on 14th June 2021 approved the draft NSGA Masterplan SPD for publication and statutory consultation. This Cabinet report sets out the consultation feedback received, officer responses and recommended changes to the Masterplan SPD for Cabinet to consider (Appendix 1). The report recommends Cabinet approve the adoption of the Neasden Stations Growth Area Masterplan Supplementary Planning Document (Appendix 2).

Consultation on draft NSGA Masterplan SPD – Overview

- 3.5 The draft NSGA Masterplan SPD document was consulted upon for an extended 7 week period starting 21st June 2021 and ending 9th August 2021. It was placed on the Brent Council website and consultation portal. It was also publicised on social media channels including Twitter, Facebook and LinkedIn. Paper copies were made available at the Willesden and Wembley libraries. 1500 consultation flyers were distributed to residents in and around the NSGA, which included details of consultation events. 4 consultation drop in sessions were held in and around the NSGA to listen and answer concerns and queries regarding the draft Masterplan SPD. A wide range of stakeholders including individual residents, local organisations, councillors, statutory consultees, landowners and developers, and other interested parties identified on the planning policy contacts database were notified of the consultation.
- 3.6 36 responses were received. Responses are broadly positive and supportive of the overarching vision for regeneration set out in the draft NSGA Masterplan SPD, but include specific questions and concerns. Resident concerns cover a range of detailed issues including transport, public realm, open spaces, safety, affordable housing, scale and height of development, local amenities and infrastructure. Statutory consultees responded on their areas of responsibilities, including Greater London Authority on planning policy and Transport for London focus on the proposed West London Orbital line. Landowners and developers emphasised the need for flexibility, and not to unduly constrain development, nor set overly prescriptive land use, design and infrastructure requirements.

Consultation Responses – Summary

- 3.7 The NSGA final consultation report is attached at Appendix 1 and after providing an overview of the consultation, at sections 4.1 and 4.2 details the schedule of consultation responses, officer considerations and proposed changes to the draft NSGA Masterplan SPD. A summary of the main consultation response themes and proposed changes is also set out below.

Consultation Process

- 3.8 Criticism was received from one resident about the Council's communications, engagement and commitment to consultation. Two other residents stated there were not enough people to answer questions at the consultation event at St Catherine's Church. In response, it is noted that the consultation was widely communicated via online and physical media, included 4 physical drop-in sessions, and took place over an extended 7 week period, in excess of the 4 weeks required under relevant Regulations. An additional 1 week was provided after requests from some respondents to finalise their representations, and an extra consultation event held for residents of Severn Way, Selbie Avenue and Denzil Road, attended by local ward councillors. Officers were available to answer questions at all public consultation events, however demands for additional officer resource for future public consultation events are noted.

Scale & Height Development

- 3.9 Whilst there was broad recognition amongst respondents that Neasden is in need of regeneration, some resident responses expressed concern about the scale and height of redevelopment envisaged for the area. Conversely, landowner and developer responses emphasised the importance of flexibility, to not constrain development potential nor place limits on the amount or height of development in advance of more detailed design and planning. In response, it is noted that the Masterplan SPD sets the urban design framework and principles to guide development, but individual site proposals will also be judged on their merits and contribution to comprehensive regeneration of the area, plus be subject to further consultation at planning determination stage. It is also noted that NSGA is designated a Tall Building Zone due to existing and future high public transport accessibility. Proposed changes to the draft Masterplan SPD to address consultation responses on scale and height of development include adding a heights plan, new text to note that new development must adhere to Brent Design Guide privacy and amenity standards, and removal of references to maximum capacities in growth capacity study scenario options.

Infrastructure & Public Realm

- 3.10 Responses include both resident and statutory consultee emphasis on the importance of ensuring regeneration and growth is supported by new and improved infrastructure, including transport infrastructure, community facilities, local amenities, green and open spaces, and prioritises local streets and public realm. In response, it is noted that the Masterplan SPD sets out the key infrastructure requirements for comprehensive regeneration of the area, and that the Council will provide further implementation detail in its Infrastructure Delivery Plan. It is also noted that the Masterplan SPD supports the London Plan approach to Healthy Streets, more active travel and a better public realm. Changes are proposed to add text to provide further detail necessary to secure proper transport infrastructure, sports facilities, utilities, green and open spaces.

Affordable Housing

- 3.11 Responses include resident demands for truly affordable housing in Brent. In response, it is noted that new development coming forward in the area must adhere to London Plan and Brent Local Plan requirements. Social Rent and London Affordable Rent is expected to be the predominant form of affordable housing tenure delivered in new development, which factor in local earnings into rent setting and are considered best able to meet Brent's housing needs.

Severn Way / Selbie Avenue

- 3.12 Severn Way and Selbie Avenue Residents Association (SWASARA) stated they are in favour of enhancement of Neasden Station and the proposed West London Orbital line, but noted that new housing must be supported by infrastructure and that new homes be affordable to local residents. SWASARA also raised concern Brent Council would use Compulsory Purchase Order (CPO) powers to acquire homes. Residents living in these streets also expressed concern that development would impact their natural light and privacy. In response, it is noted that the Masterplan SPD and Council's Infrastructure Deliver Plan set out the infrastructure required to support development. It is also noted that any redevelopment at Severn Way and Selbie Avenue is likely to be longer term, and that CPO is rarely used and outlined within the document as a mechanism of final resort when land assembly is challenging and landowners, developer and residents are unable to work together. To provide greater clarity a land ownership and phasing plan is now proposed to set out estimated delivery timescales over the short, medium and long term.

West London Orbital

- 3.13 Responses from the Greater London Authority (GLA), Transport for London (TfL) and West London Alliance (WLA) all recognise increased connectivity benefits that would be provided by the proposed West London Orbital (WLO) line, and note that the draft Masterplan SPD preferred Option 3 as worded could be read to exclude the proposed WLO. In response, it is noted that all draft Masterplan SPD growth capacity scenarios safeguard the WLO, however testing is undertaken "without" and "with" the WLO, as it is anticipated that development in the area will outpace delivery of the WLO, which is also not guaranteed. It is however proposed to amend the text that the growth capacity scenarios test development "before" and "after" the WLO to make clear that no option excludes the WLO. It is also noted that the preferred urban design framework and principles for optimised co-location of residential uses that apply under Option 3 before the WLO is delivered, would equally apply under Option 6 were the WLO to proceed, with the infrastructure provision outlined also able to support the higher development capacities under Option 6. Further changes have added more spatial context and detail on the current status of the WLO, and marked the safeguarded WLO Station on all relevant maps.

Financial Viability

- 3.14 Some landowner and developer responses query the financial viability of the Masterplan SPD Options. In response, officers note that they are satisfied viability has been robustly tested in line with national, regional and local policy, the Masterplan is viable for the bulk of the sites, and no changes are proposed.

National Highways

- 3.15 National Highways (formerly Highways England) in responding to Brent's new Local Plan and the draft NSGA Masterplan SPD required that prior to adoption of the Masterplan SPD, the Council undertake a transport assessment to assess the impact of development upon the Strategic Road Network (SRN) and M1 Junction 1. Such study was undertaken and shared with National Highways, who confirmed 9th March 2022 that they are content that development within the NSGA will not have significant impact on the SRN and M1 Junction 1.

Other Changes

- 3.16 Appendix 1 at 4.2 also lists additional editorial changes including to make text more accurate and consistent, clarifications, new maps and image labels.

4.0 Financial Implications

- 4.1 NSGA Masterplan SPD costs were met from a Greater London Authority Homebuilder Capacity Fund grant and existing Regeneration budgets.
- 4.2 There are no financial implications in approving the adoption of the NSGA Masterplan SPD.

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 Statutory public consultation was carried out in the process of preparing and adopting the NSGA Masterplan SPD. Equality Analysis was undertaken in advance of consultation which identifies no negative impacts in relation to people with protected characteristics. The NSGA Masterplan SPD would be expected to have positive impacts on existing and new communities alike. The provision of affordable housing, workspace, public spaces and public realm is identified as having the potential to positively benefit people of all ages. The provision of accessible housing and the proposed WLO station is identified as having the potential to positively benefit people with disabilities.

7.0 Consultation with Ward Members and Stakeholders

- 7.1 The Lead Member for Regeneration, Property and Planning was regularly briefed during development and consultation on the draft NSGA Masterplan SPD. Ward councillors from Dollis Hill, Dudden Hill, Welsh Harp and Willesden Green wards were regularly briefed during development and consultation on the draft NSGA Masterplan SPD.
- 7.2 Stakeholder engagement including with the Greater London Authority, West London Alliance, Transport for London, local landowners (including the College of North West London) and developers was undertaken during development and consultation on the draft NSGA Masterplan SPD. The Design Council peer reviewed the draft NSGA Masterplan SPD.
- 7.3 Statutory public consultation was undertaken for an extended period of 7 weeks in line with the relevant Regulation and as set out in this report.

8.0 Human Resources/Property Implications (if appropriate)

- 8.1 Regeneration and Planning have developed the draft NSGA Masterplan SPD in-house.

Report sign off:

Alan Lunt

Strategic Director of Regeneration &
Environment

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CONSULTATION STATEMENT

Draft Neasden Stations Growth Area Masterplan Supplementary Planning Document (SPD) Consultation Statement, April 2022

This document sets out the public consultation that took place for the draft Neasden Stations Growth Area Masterplan SPD, summarises the representations received and the Council's response.



Appendix 1

Draft Neasden Stations Growth Area Masterplan Supplementary Planning Document (SPD) Consultation Statement April 2022

This Consultation Statement has been prepared in accordance with Regulation 12(a) and (b) of the Town & Country Planning (Local Planning) (England) Regulations 2012. It sets out details of the consultation that took place and which has informed and refined the Supplementary Planning Document (SPD).

• Background

Neasden Stations Growth Area (NSGA) is a priority Growth Area in the Brent Local Plan. NSGA aims to provide at least 2,000 new homes, employment and supporting infrastructure, including green space, transport, community facilities, and enhanced public realm. This vision will be achieved through redevelopment of an extensive area of under-used or surplus land to build a new residential community, incorporating in part the co-location of new industrial with residential. Through a master planning approach, the NSGA Masterplan SPD has been prepared to guide the comprehensive regeneration of the area.

The Masterplan SPD sets out the vision, policy context and the urban design framework comprising of development, sustainability and environmental principles that will guide future comprehensive development of the area. It gives a positive message that Brent welcomes and encourages new development of high-quality sustainable design, and recognises the benefits that it can bring to communities. It aims to assist developers, designers, local communities, planning officers and those determining planning applications to understand better what is expected of new developments in NSGA depending on its surrounding context and how regeneration can be achieved holistically.

• Area of coverage

NSGA comprises 11.5 hectares of land around Neasden Underground Station. The Growth Area is composed of six sites that are identified separately in the Masterplan SPD. These include three Locally Significant Industrial Sites (LSIS), which are the McGovern site, O'Hara site and the Falcon Industrial Estate. The three other sites are Dephna House and surplus London underground land site on Neasden Lane, the College of North West London (CNWL) site on Denzil Road including the residential area of Selbie Avenue and Severn Way, and a site including properties along the south-east of Neasden Lane including the former Neasden Service Station.

• Consultation

The draft SPD was subject to 7 weeks of formal consultation from **21 June 2021 to 9 August 2021**. This was in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community

Involvement (SCI). This Consultation Statement sets out the comments received, the Council's response and where appropriate consequential changes made to the SPD.

In accordance with the Council's SCI, during the consultation period, the following process was adhered to:

- The draft Masterplan SPD and details of the project and how to get involved were showcased on a dedicated website <https://www.brent.gov.uk/your-community/regeneration/growth-areas/neasden-stations-growth-area/>
- The draft Masterplan SPD, and an online feedback form were made available on a dedicated consultation portal.
- 1500 promotional flyers were distributed to residents and businesses in and around the NSGA. Individual flyers were also handed out during the four consultation events.
- The consultation was publicised via social media channels- Facebook, Twitter and LinkedIn.
- Hard copies of the draft Masterplan SPD were made available to view at Wembley and Willesden libraries, alongside copies of the feedback form.
- Stakeholders and groups on the planning consultation database were emailed, notified of the consultation and consultation events, and invited to comment and attend the consultation events.
- Dedicated consultation updates sent to all local ward councillors to promote the consultation and events
- Four drop-in sessions were organised at various locations around NSGA as shown in the table below. A dedicated drop-in session for the residents of Severn Way and Selbie Avenue was organised to answer specific concerns and queries regarding the draft Masterplan SPD.

Drop-in sessions

Monday 5th July 2021	3-6pm	Neasden Town Centre, near Neasden Parade, 263-265 Neasden Lane, NW10 0AA
Friday 9th July 2021	4-6pm	St Catherine's Church, Church forecourt, Neasden Lane, NW10 1QB
Thursday 15th July 2021	4-6pm	The Grange, Neasden Lane, London NW10 1QB
Saturday 11th September 2021	10-12am	Open space on Selbie Avenue, London NW10 2UT

A summary of comments received, together with any recommended changes to the Masterplan SPD can be found below. The draft NSGA Masterplan SPD together with this consultation statement were presented to Cabinet when it considered and adopted the SPD.

• Consultation responses and changes

36 responses were received from statutory consultees, locally active organisations and individual residents in and around the NSGA. 95 people including residents, statutory

consultees, developer team and other stakeholders attended the 4 consultation events. There were 1421 hits to the dedicated NSGA website, including 458 views of the NSGA Masterplan SPD page, 142 hits to the get involved page and 54 hits to the latest news section. The majority of the consultees responding were overall positive about the contents of the draft Masterplan SPD. There were some areas of concern which have been addressed in the Council's responses below. See 4.1 for Summary of responses and recommended changes for Draft NSGA Masterplan SPD.

4.1 Summary of responses and recommended changes: Draft NSGA MASTERPLAN SPD

The following format has been used to denote the **PROPOSED CHANGES**:

Bold text = Updated section details

Underlined bold text = new text proposed compared to draft consultation version

Strikethrough text = text proposed for removal compared to draft consultation version

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
1.	John Cox	Chapter 5: Tomorrow's Neasden Stations Growth Area; Pg. 50-53; Figure 18-23	Provide replacement images for page 50-53 that includes WLO station.	The WLO is shown on all masterplan capacity options marked as 'proposed WLO station' with a black logo (pg. 50-53). There are no replacement images. All images shown as part of the draft SPD are in the public domain.	5.2 Growth Capacity Study scenarios (pg.50-53): The legends on all Figures 18, 19, 20, 21, 22, and 23 in this section have been amended to reflect safeguarded WLO Station where it applies. This document is in the public domain and can be accessed via the NSGA webpage. Link to the same will be provided.
Page 137	Chris Queen	General	Lack of communication and not enough publicity of the consultation events. Lack of engagement from ward Councillors. Council avoiding scrutiny and rubber stamping scheme.	1500 consultation flyers, which included details of the events, were distributed to residents in and around the Neasden Stations Growth Area (NSGA). Four drop-in sessions were organised at various locations around NSGA to answer any concerns and queries regarding the draft SPD. Hard copies of the draft SPD were made available at both the Willesden and Wembley libraries. All the events were publicised on social media channels, including Twitter, Facebook and LinkedIn. A dedicated NSGA webpage and consultation portal webpage was available for collating feedback and responses. The consultation ran for a period of 7 weeks. The relevant regulation only seeks a minimum of 4 weeks of consultation on an SPD.	No change
	Chris Queen	General	Need for sensible regeneration. 2000 units next to Neasden Station not a solution. Need for independent planner to start to solve the problem with appalling road systems.	The SPD identifies the constraints and key infrastructure requirements for NSGA and seeks to guide developers, landowners, residents, planners, and everybody involved in the area's future comprehensive development to support regeneration. A separate infrastructure delivery plan is being prepared that identifies the delivery and implementation of infrastructure across the NSGA. This includes transport, community and green infrastructure for the next five-plus years.	No change
3.	Martin J Well	Draft SPD	Need for regeneration to come forward sooner rather than later.	The draft SPD Section 7 -Delivery showcases the developments that can come forward in the short, medium and long term. The timeframe is largely based on ownership consideration, with larger sites in single ownership expected to come forward for delivery earlier than multiple-ownership sites.	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	Martin J Well	Draft SPD	Concern regarding safety on public open spaces. Crime prevention measures should be taken. Need for road and transport infrastructure.	Section 6: Development Principle DP8: 'Safety, security and active frontage' requires developments to conform to the standards set within 'Secured by Design' (SBD) which incorporates designing out crime principles.	No change
4.	Pam Laurence	Draft SPD	Need for truly affordable housing with enough space.	The draft SPD Section 6.4 Development principles -DP4 New and affordable homes set out recommendations based on London Plan Policy H4 Delivering Affordable Housing and Brent Local Plan Policy BH5 Affordable Housing. Any development coming forward must adhere to the policy requirements set out in the London Plan and Brent Local Plan on affordability and mixed tenure developments.	No change
Page 138	Pam Laurence	Draft SPD	Access to their own outdoor space. Range of different kind of green space catering to different user groups, kids, youth, adults. Places for people to meet; pubs, bars, laundrettes, public seating, youth club spaces, places to practice cycling, parents and toddler groups etc.	Local Plan policy BH13 Residential Amenity Space sets out private amenity space standards that developments are generally required to meet. Section 6.5 Environment and sustainability principles ESP7: Open space and amenity recommend the need for new developments to provide a series of green open spaces and pocket parks accessible to the local community. We acknowledge the suggestions made regarding the kind of spaces and need for focused community activities. We will include these suggestions within the character area section that showcases future characteristics of the area. Please note that all development proposals on individual sites are subject to statutory consultation as they come forward for planning determination. This will be an opportunity for you to provide further feedback on the detailed proposals.	Text added: 6.2 character area: Future Character- para 6.2.14, 6.2.17, and 6.2.20 <u>Future development proposals must engage with the local community to determine the type of community functions and green spaces.</u>
	Pam Laurence	General	The public consultation at St Catherine's was disappointing as there were not enough people who could answer questions.	We appreciate your feedback on the consultation event at St. Catherine's Church, and it will be considered when organising future consultation events.	No change
	5. Ian Saville	Draft SPD	There is mention of affordable housing, but currently definitions make this unaffordable for a large proportion of Brent residents. Do you propose to peg rents to average salaries in Brent?	Section 6.4 Development principles -DP4 New and affordable homes set out the recommendations based on London Plan Policy H4 Delivering Affordable Housing and Brent Local Plan Policy BH5 Affordable Housing. Any development coming forward will need to adhere to the policy requirements within the London Plan and Brent Local Plan. Social Rent / London Affordable Rent is required as the predominant form of affordable housing tenure to be delivered in new development, which factors local earnings into their rent setting, and are considered best able to meet Brent's housing needs. Development may also provide for London Living Rent as part of the 'intermediate' affordable dwellings. The affordability of this product is set against average incomes set out annually by the GLA.	No change
	Ian Saville	Draft SPD	As well as providing walking/cycling routes, more needs to be done to actively discourage car and motor vehicle use, which causes major health problems.	The SPD promotes London Plan Policy T2 Healthy streets, supporting a modal shift to active travel in all new developments. Section 6.4 Development Principle DP7 Movement and accessibility requires car-free or car-lite development in areas with good public transport.	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				Principle ESP2: Air quality requires development in Growth Areas to be air quality positive, minimising occupants' exposure to poor air quality.	
	Ian Saville	General	The public consultation at St Catherine's was disappointing as there were not enough people who could answer questions. Expecting detailed presentation.	Comments noted for future consultation. The drop-in sessions were not designed to give detailed presentation but an opportunity for an open discussion regarding the SPD. This allows for flexibility and everyone to participate. Please note individual development proposals within the NSGA would be subject to statutory consultation as they come forward for planning determination and which will be an opportunity to provide further feedback on detailed scheme proposals.	No change
6.	Marek Kaminski	General	Introduce multidisciplinary engineering consultancy firm (BRUENG Ltd) based here in Brent. Keen on growing our connections and exploring opportunities that we can offer our services.	Details passed on to the planning team to add to future mailing list for information regarding engagements on relevant projects. Recommend getting on Brent's Community Directory. Details will be passed to property directory. Please find link to the community directory: https://www.brent.gov.uk/your-community/community-directory/	No change
7.	Altaf Choudary; Ali Gamal, Stephen Daku and Mike Evans	Draft SPD	Consultation events need to be on a weekend to allow transparent engagement.	All consultation events were organised in the evening between 4-6pm. An additional dedicated event was also organised on a Saturday for residents of Severn Way, Selbie Avenue and Denzil Road, and which was also attended by local ward councillors.	No change
Page 139	Altaf Choudary; Ali Gamal, Stephen Daku and Mike Evans	Draft SPD	Resident of Severn Way pushed in an enclave of high rise buildings. Direct invasion of any natural light and privacy. Opposition to blocks built immediately behind Severn Way next to national rail casting shadows 24/7. Little consideration made for residents of Severn Way.	NSGA is identified as a Tall Building Zone because of existing and future high public transport accessibility (with the WLO) and potential for optimising industrial land through intensification and residential co-location, making efficient land use to meet housing and employment needs. The Brent Local Plan and Brent's Tall Building Strategy recognises the area within NSGA to be appropriate for tall buildings. Policy BD2 Tall Buildings in Brent, Policy BP2 East and Policy BEGA1 NSGA requires a master planning process to inform the heights within the NSGA area and tall buildings to step down to form a comfortable relationship with adjacent surroundings. The draft SPD conforms to these policies and guides future comprehensive developments of the area. However, it does not prescribe a detailed design for the sites. Heights and massing will be assessed when individual schemes come forward for planning permission. Please note that all development proposals seeking planning permission will be subject to statutory consultation. This will be an opportunity to provide further feedback on the detailed proposals. Section 6- Urban Design Framework 6.2.14 within the draft SPD clearly states that building heights should step down to Dudden Hill Lane and Selbie Avenue. Adequate setbacks and street widths need to be considered as part	5.2 Growth Capacity Study Scenario: Included heights plan within preferred co-location option 3 6.2 Character Areas: Character Area Tables 14 (College Green) and 15 (Denzil Road)- Building type, heights and massing: - <u>All new developments must adhere to Brent Design Guide SPD1 principles for privacy and amenity.</u>

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				of any future proposal. The point made on appropriate heights needing to be set out more clearly within the SPD is accepted. We will include a heights plan within our preferred option- optimised co-location option 3 and reference to Brent Design Guide SPD1 principle on privacy and amenity spaces in Table14 and 15 College Green and Denzil Road character area table that set out sun orientation and shadowing standards with respect to building type, heights and massing.	
	Altat Choudary; Ali Gamal, Stephen Daku and Mike Evans	Draft SPD	Ask to be consulted further and be involved in any decisions that will impact the neighbourhood.	We will add your details to our consultation database so you will be informed of future consultations.	No change
8.	Steve Atkinson	Draft SPD	Support the vision and values set within the draft NSGA masterplan SPD.	We welcome your support of the draft SPD.	No change
	Steve Atkinson	Draft SPD	A lido would be nice.	Inclusion of a LIDO would depend on the market interest and discussions with landowners/developers at the time of planning application. Please note detailed schemes on individual sites will be subject to further statutory consultation and engagement with residents and community when they come forward for planning determination.	No change
Page 140	Steve Atkinson	Draft SPD	Prioritise open space and parks, streets and public realm, and Public transport accessibility. Support the development, environment and sustainability principles set within the SPD.	The SPD sets out the development requirements in section 6.3 . It also sets out principles for open space and parks, street and public realm and improvements to public transport accessibility. Please refer to Principle DP1, Principle DP7, Principle DP8 and Principle ESP7 . We welcome your support of the environment and sustainability principles.	No change
9.	Sue Arnold and Helen Grunberg	Draft SPD	Agreement that Neasden is sadly in need of regeneration. I would like to see the land used as set out in your vision. I look forward to more comprehensive plans in the future.	We welcome your support of the draft SPD.	No change
	Sue Arnold and Helen Grunberg	Draft SPD	All the housing should be affordable and the height kept to no more than six storeys.	Section 6.4 Development principles -DP4 New and affordable homes sets out recommendations based on London Plan Policy H4 Delivering Affordable Housing and Brent Local Plan Policy BH5 Affordable Housing. Any development coming forward will need to adhere to the policy requirements as set out in the London Plan and Brent Local Plan on affordability and mixed tenure developments. Section 6.4 Development principles -DP4 New and affordable homes set out recommendations based on London Plan Policy H4 Delivering Affordable Housing and Brent Local Plan Policy BH5 Affordable Housing. Any development coming forward will need to adhere to the policy requirements as set out in the London Plan and Brent Local Plan on affordability and mixed tenure developments. NSGA is identified as a Tall Building Zone because of existing and future high public transport accessibility (with the WLO) and potential for optimising industrial land	No change

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	Sue Arnold and Helen Grunberg	Draft SPD		through intensification and residential co-location, making efficient land use to meet housing and employment needs. The Brent Local Plan and Brent's Tall Building Strategy recognises the area within NSGA to be appropriate for tall buildings. Policy BD2 Tall Buildings in Brent, Policy BP2 East and Policy BEGA1 NSGA requires a master planning process to inform the heights within the NSGA area and tall buildings to step down to form a comfortable relationship with adjacent surroundings. The draft SPD conforms to these policies and guides future comprehensive developments of the area. However, it does not prescribe a detailed design for the sites. Heights and massing will be assessed when individual schemes come forward for planning permission. Please note that all development proposals seeking planning permission will be subject to statutory consultation. This will be an opportunity to provide further feedback on the detailed proposals.	No change
	Sue Arnold and Helen Grunberg	Draft SPD	Also it is very important that the infrastructure is in place to support all this extra housing.	The SPD sets out the development and infrastructure requirements in section 6.3 Development Amount that consider the future infrastructure needs of the Area.	No change
Page 141	Sue Arnold and Helen Grunberg	General	Handouts confusing.	Comments noted and will be considered for future consultations.	No change
	Blair Thorpe	Draft SPD	Support the vision and values set within the draft NSGA masterplan SPD.	We welcome your support on the draft SPD.	No change
	Blair Thorpe	Draft SPD	Prioritise streets and public realm. Sensible bike storage and secure bike parking.	The SPD sets out the principles and requirements for street and public realm within DP7 Movement and accessibility and the character area section 6.2 for each of the sites. The SPD supports car-free or car-lite developments, and the need for bike storage and secure bike parking will be a key requirement for any future proposal. Principle DP7 sets out the approach for sustainable travel and cycling in line with London Plan Policy T5 Cycling and Brent Local Plan Policy BT1 Sustainable Travel Choice. Para 6.4.25 and Principle DP7 recommendation requires that new developments facilitate walking and cycling by providing safe cycle routes, secure storage within buildings, and cycle parking within the public realm.	No change
	Blair Thorpe	Draft SPD	Pocket parks are not viable long term and do not provide a real green space, would rather fewer but larger parks especially where they are buffer to railway tracks or busy road (north circular). Trees space big enough to plant specimen large trees. Silver birches might be native to the UK but they are a pioneer trees thus short lived and do not form good looking strong tree.	The SPD promotes a series of green open spaces in the form of pocket parks and local public open spaces depending on the location and size of the sites. This presents a more viable option, especially in areas with Tall Buildings, as it helps create places of interaction and animates the spaces with breaking long building frontage. The draft SPD sets out the guidance for future comprehensive development of the area. Please note individual development proposals within the NSGA would be subject to statutory consultation as they come forward for planning and will also be an opportunity to provide	No change

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				detailed feedback on the proposal. Details such as kind of parks, sun orientation, buffers to railway, tree species will be considered when detailed schemes come forward for planning.	
	Blair Thorpe	Draft SPD	Quality of building design with appealing/interesting roof profiles not just flat boxes. Support the development, sustainability and environmental principles associated with the building skyline, this is especially important with tall buildings as they are dominant against the sky. Past buildings had chimneys, parapet, cornices, dormers, and pitched roof that "broke up" the roofline and sky line to make it visually interesting. There is an importance of the roof design. Residences need to be sun orientated.	The SPD is underpinned by our values (section 2.3), which outlines design quality and materiality for future NSGA developments. The character area section 6.2 further supports the need for an animated skyline with a range of densities adding visual appeal. Developments will need to refer to Brent Design Guide SPD1 that set out guidance on sun orientation.	No change
11.	James Edholm	Draft SPD	Support the vision, especially the proposed crossing across of the railway.	We welcome your support of the vision and values set out within the draft SPD.	No change
Page 142	James Edholm	Draft SPD	Prioritise social and community, walking and cycling routes.	<p>The SPD in DP6: Social infrastructure and community needs outline the principles and requirements for social and community facilities as below:</p> <ul style="list-style-type: none"> - Development should support the provision of new multi-functional community facilities (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. <p>Walking and cycling routes are outlined in DP7 Movement and accessibility. Additionally, an Infrastructure Delivery Plan is being prepared for NSGA that identifies the site-specific and strategic infrastructure needs and delivery/implementation mechanism for; transport, social/community and green infrastructure for NSGA and wider areas.</p>	No change
	Resident	Draft SPD	Generally supportive of regeneration of Neasden. It's a great area, but could benefit from regeneration.	Comments noted. We welcome your support for regeneration within NSGA. The draft SPD sets out the vision, values and principles that provide guidance on the comprehensive regeneration of the area.	No change
	Resident	Draft SPD	Prioritise public transport accessibility.	The draft SPD identifies the opportunities and infrastructure needs that will help improve the public transport accessibility of NSGA. Section 6.4 Development principle DP7: Movement and accessibility , within the draft SPD, further sets out principles for improving accessibility via public transport	No change

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				and safe walking/cycling routes. The future provisions for a West London Orbital link will further help in improving the accessibility to the wider area.	
13.	Rita Francesca Valentini	General	Safety especially at night is an issue currently. Streets abandoned, dirty and poor lighting. Harassment by the drugged and alcoholic. Better maintenance of street and need for street lighting. Problems with fly tipping and rubbish. People will move to Neasden only when if safe and there are clean areas.	Comments noted. Principle DP8: Safety, security, and active frontage requires developments to provide a safe environment and design out crime as part of the design process. Developments will need to conform to the standards of Secured by Design (SBD) and Approved Document Q of the Building Regulations 2010. This will help create safe environments that people want to occupy and use, creating a strong and positive sense of community identity. Whilst the SPD seeks to improve the area in terms of safety, crime prevention, fly-tipping and public realm improvements, by setting out principles that will help to better the area, it alone cannot resolve cleanliness and social behavioural issues.	No change
	Rita Franscesca Valentini	Draft SPD	It should be a socially diverse area with mix of private and social rent.	Section 6.4 Development principles -DP4 New and affordable homes set out the recommendations for affordable and new housing. Any development coming forward will need to adhere to the policy requirements as set out in the London Plan and Brent Local Plan.	No change
Page 143	Rita Franscesca Valentini	Draft SPD	Prioritise open space and public realm, public transport accessibility, street and public realm, walking and cycling routes and safety. It needs safe walking routes to transport hubs. Better connection to central London (Jubilee is good) and Metropolitan should stop at Neasden. Improved accessibility to London.	The draft SPD sets out principles and infrastructure requirements for open spaces and parks, public realm improvements and walking cycling routes to guide future development in the area. Regeneration and new development will also contribute to local infrastructure improvements. Please refer to Principle DP1 Maximising the potential for the sites, Principle DP7 Movement and accessibility, Principle DP8 Safety, security and active frontage and Principle ESP7 Open space and amenity. The West London Orbital link proposals are identified as an opportunity to improve public transport accessibility to the wider area. The remit of the draft SPD does not include identifying a new Metropolitan Line stop at Neasden, but we recommend getting in touch with TfL, who will clarify such transport-related queries.	No change
	Rita Franscesca Valentini	Draft SPD	Support for sustainability and environmental aspects.	We welcome your support on the environment and sustainability principles.	No change
	Rita Franscesca Valentini	General	Poor reputation of Neasden. Make sure to renovate all Neasden. Areas in Neasden really need some serious refurbishment and also to avoid ghettos and ensure a better mix.	Comment noted. The draft SPD sets out the vision and values for NSGA in Chapter 2 , the type of place Neasden can be in the future and the qualities it can possess to guide future comprehensive development of the area.	No change
	Rita Franscesca Valentini	General	Additionally the area requires a gym and a supermarket.	Please note individual development proposals within the NSGA would be subject to statutory consultation as they come forward for planning which will be an opportunity to provide further feedback on detailed proposals, such as provisions for gyms and supermarkets.	No change
14.	Sam Myers	Draft SPD	Support for the vision and values within the draft NSGA masterplan SPD.	Comments noted. We welcome your support for the vision and values set out within the draft SPD.	No change

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	Sam Myers	Draft SPD	Prioritise open space and parks, public transport accessibility, walking and cycling routes.	Figure 2 'Vision Map' and Principle DP1 Maximising potential for the sites outlines our approach to comprehensive development across the NSGA. Principle ESP7 Open space and amenity sets out the principles and requirements for open space and parks, and Principle DP7 Movement and accessibility outlines the principles that would improve public transport accessibility through provision of walking/cycling routes, bus and rail links. Additionally, the future provision of the WLO would further enhance accessibility to the wider areas.	No change
15.	Vic Deslink	Draft SPD	Support for the vision and values. Prioritise public transport accessibility.	Comments noted. We welcome your support of the vision and values underpinning the draft SPD and the need for regeneration. Section 6.4 Development principle DP7: Movement and accessibility , within the draft SPD outlines the principles that would improve public transport accessibility by providing walking/cycling routes and bus/rail links. Additionally, the future provision of the WLO would further enhance accessibility to the wider areas.	No change
Page 144	Vic Deslink	Draft SPD	<p>Support for the principles but concerned about my home disappearing in Phase 3a. Time lines for each of the phases would be very helpful.</p> <p>While I do agree in principle for the significant development outlined in Phases 1 to 3, forcing residents out of their homes as indicated in Phase 3a for the sake of one additional high rise is overly aggressive and indicates greed and contempt for many of us that have lived very happily in this neighbourhood for more than two decades!</p> <p>As stated previously, we are fully in support of Phases 1, 2 and 3. It is a great idea and much needed an area that has remained stagnated for a lengthy period of time!</p>	<p>Comments noted. We welcome your support of the vision and values underpinning the draft SPD and the need for regeneration. It is recognised that the inclusion of Severn Way and Selbie Avenue properties within the site allocation may be of concern to existing residents. However, the borough's housing needs and targets set in the London Plan are very high compared to historic levels. This, together with national policies and those within the London Plan, which promote the most effective use of land near railway stations, has meant that the Council has had to consider the potential of sites with higher levels of public accessibility in the borough to be used much more intensively.</p> <p>The existing and potential public transport improvements in this area, together with the obvious availability of large areas of land around the stations for redevelopment, has resulted in the identification of the Neasden Stations Growth Area. This is not unlike numerous other parts of the borough where people currently live, which from a planning policy perspective, are acceptable for redevelopment for more intensive residential development. Currently, as set out in the SPD, it is not considered likely in the short to medium term that the Selbie Avenue/ Severn Way estate will come forward for comprehensive redevelopment. Although many of the homes are still owned by the Council, other sites are more of a priority for delivering greater intensity of use of land to accommodate much needed affordable homes. The Council in regeneration schemes at South Kilburn has engaged with occupiers and leaseholders throughout the renewal process. It has offered better quality homes for tenants and options for leaseholders either on-site or through financial compensation that more than adequately</p>	Section 7- Delivery- Figure 29: Include timeline in years (0-20+ yrs) for short/medium and long term on phasing plan with: Short term- 0-10yrs, Medium-10-15yrs, Long term- 15-20yrs.

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				<p>addresses needs. The Council will always look to work with existing tenants/ property owners to effectively address any issues through co-operation and agreement, rather than the compulsory purchase alternative, which is rarely used. The allocation in the Local Plan and the development that comes forward on adjacent sites is likely to increase property values considerably above those that currently exist as the area's potential is realised, to the benefit of existing property owners.</p> <p>Section 7 on Delivery shows the phasing plan from 0 to 20+ years within NSGA. However, the phasing plan in section 7 will be updated to show the timeline for the short/medium and long term.</p> <p>Please note individual development proposals NSGA are subject to statutory consultation as they come forward for planning determination. This will be an opportunity to provide further feedback on detailed scheme proposals as they come forward.</p>	
16.	Ville Koskinen	Draft SPD	The draft SPD is a great assessment of the needs, requirements and restrictions of the area.	Comments noted. We welcome your support of the draft SPD and the principles set out within the document.	No change
Page 145	Ville Koskinen	Draft SPD	Pleased to see walking and cycling planned into the proposals. Prioritise public transport accessibility, Walking and cycling routes. Agree with the principles.	The SPD prioritises public transport accessibility and need for walking cycling infrastructure. Principle DP7 Movement and accessibility outlines the principles that would improve public transport accessibility through provision of walking/cycling routes, bus and rail links. Welcome support of the principles.	No change
	Ville Koskinen	Draft SPD	Concerned about the height of the proposed high-rise buildings. They would be the tallest buildings around. Has the issue with shadows and obscuring sunlight been considered? Considering the current difficulties with cladding in high-rise buildings, are developers interested in the proposals?	<p>Local Plan Policy BEGA1 and the Tall Building Strategy 2020 identify NSGA as a Tall Building Zone with heights ranging from 4-20 storeys. This is because of existing and proposed public transport accessibility (with the WLO) and potential for optimising industrial land through intensification and residential co-location, making efficient land use to meet housing and employment needs. The Tall Buildings Strategy provides flexibility on heights and anticipates further analysis associated with the master planning can inform potential building heights in the growth area.</p> <p>The draft SPD conforms to the policy and strategy and guides future comprehensive developments in the area. Section 6.2 character area within the SPD provides details on the future characteristics of the area. It requires buildings to step down to respond to the surrounding context. However, the draft SPD is a guidance document and does not prescribe the detailed design for the sites. Individual schemes will be evaluated when they come forward for planning determination and will need to meet the standards for sunlight/shadowing, cladding etc.</p>	<p>6.2 Character Areas: Character Area- Tables 14 (College Green) and 15 (Denzil Road)-</p> <p>Building type, heights and massing- All new development must adhere to Brent Design Guide SPD1 principles for privacy and amenity.</p>

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				We welcome your support for the enhancement of Neasden Station and the proposal for the West London Orbital link. Suggestions noted. Details such as northern public entrance/exit with barrier may be a consideration when detailed proposals for the sites come forward for planning. The draft SPD identifies the constraints to the movement network and principle DP7: Movement and accessibility recommend developments to prioritise active, efficient and sustainable transport choices, with a particular emphasis on improving conditions for pedestrians and cyclists. Section 6 sets out the development principles, and Section 6.3 sets out the development amount specific to the sites. Section 9.6 discusses the CIL/S106 obligation and considerations for schemes when they come forward for planning permission. The draft SPD identifies the planned infrastructural requirements for the area, which future proposals must take into consideration while planning for individual sites within the NSGA.	
17. Page 146	Severn Way and Selbie Avenue Residents' Association (SWASARA)	Draft SPD	In favour of the enhancement of Neasden Station and the proposal for this to expand to embrace the little-used freight line that goes above Neasden Lane. Improve transport infrastructure to in NW London Area. Need for a northern public entrance/exit with barriers could accompany the exit north of Neasden Station to expedite access and egress to the Mandir, and the housing around the Ironbridge. More and better linked pedestrian cycle ways, particularly alongside busy roads, (Neasden Lane), and also between Willesden and Wembley, Also pertaining to the NSGA developments as these aspirations will I hope be included in the CIL obligations of those investing in these housing developments.	We welcome your support for the enhancement of Neasden Station and the proposal for the West London Orbital link. Suggestions noted. Details such as northern public entrance/exit with barrier may be a consideration when detailed proposals for the sites come forward for planning. The draft SPD identifies the constraints to the movement network and principle DP7: Movement and accessibility recommend developments to prioritise active, efficient and sustainable transport choices, with a particular emphasis on improving conditions for pedestrians and cyclists. Section 6 sets out the development principles, and section 6.3 sets out the development amount specific to the sites. Section 9.6 discusses the CIL/S106 obligation and considerations for schemes when they come forward for planning permission. The draft SPD identifies the planned infrastructural requirements for the area, which future proposals must consider while planning for individual sites within the NSGA.	No change
	Severn Way and Selbie Avenue Residents' Association (SWASARA)	Draft SPD	Real commitment that the materialisation of the necessary support infrastructure is in place before or at least alongside the time that the residents move into new housing , so that the increase in traffic and human activity in the area does not put additional strain on the transport network, local shops, and services such as schools and health services. New homes to be affordable to local residents.	Figure 2 vision map (pg. 21) identifies improvements to links to the wider area, including provisions for future links across the railway corridor and improving pedestrian/cycling routes to the Mandir. Additionally, an Infrastructure Delivery Plan is being prepared that identifies the site-specific and strategic infrastructure delivery to the NSGA Growth Area including, transport, social/community and green infrastructure delivery. Section 6.4 Development principles -DP4 New and affordable homes set out the London Plan and Brent Local policy requirements and subsequently the recommendations for new and affordable homes and tenure mix in NSGA.	No change

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Page 147	Severn Way and Selbie Avenue Residents' Association (SWASARA)	Section 7.5 Compulsory Purchase Order (CPO)	Regarding the layout, against my home being demolished , as was cited as a possibility in the SPD (section 7.5 states "...Where necessary the [Brent] Council will ...consider the use of Compulsory Purchase Order (CPO) powers to secure the proper phasing and delivery of development within the growth area [NSGA] . ") Idea of homes being possibly earmarked for removal is a major mental distress and we have variously invested a lot of time and money into improving our own patch.	The need to accommodate homes and employment is significant, and the Council, through its Local Plan, has identified key Growth Areas in the most sustainable locations. Section 7 -Delivery shows the phasing plan from 0- 20+ years within NSGA. This area is identified as longer-term delivery. Please note individual development proposals within the NSGA would be subject to statutory consultation as they come forward for planning determination. Section 7.5 Compulsory Purchase Order is outlined within the document as a mechanism that the Council undertakes as a final resort where the land assembly is challenging, and the landowners/ developers/ residents are not able to work together. As an example, the Council in regeneration schemes at South Kilburn has engaged with occupiers and leaseholders throughout the process of renewal and has been able to offer better quality homes for tenants and options for leaseholders either on-site or through financial compensation that more than adequately address needs. The Council will always look to work with existing tenants/ property owners to effectively address any issues through co-operation and agreement, rather than the compulsory purchase alternative, which is rarely used. The allocation in the Local Plan and the development that comes forward on adjacent sites is likely to increase property values considerably above those that currently exist as the area's potential is realised, to the benefit of existing property owners.	No change
	18. Natural England	ESP4: Ecology, arboriculture and urban greening	Supportive of the recommendations put forward in ESP4 relating to urban greening and ecology. However, we feel this policy could be strengthened through a recommendation relating to Biodiversity Net Gain, and the need for all developments to provide the required net gain in the likely event that net gain becomes mandatory. Further to this, we have no specific comments to make on the SPD, but advise you to consider the following issues: Green Infrastructure in line with GI strategy, biodiversity enhancement, landscape enhancement, other design consideration and principles as per NPPF, strategic environmental assessment/habitats regulations assessment.	Comments noted. We welcome your support on the draft SPD and Principle ESP4 . Para 6.5.13 supports a positive contribution to biodiversity. In addition, Para 6.5.14 references Brent Local Plan Policy BG11 Green and Blue Infrastructure in Brent that requires development proposals to achieve a net gain in biodiversity. However, to ensure sufficient weight is given, reference to a net gain in biodiversity will be added within the Principle ESP4 recommendations . In addition, the inclusion of the reference to the Defra Biodiversity Metric and other tools is also considered appropriate.	6.5.14. Brent Local Plan Policy BG11 Green and Blue Infrastructure in Brent require that development proposals achieve a net gain in biodiversity. <u>Applicants should use tools to measure and account for biodiversity losses and gains, such as the DEFRA Biodiversity Metric, Small Sites Metric (SSM) and Environmental Benefits from Nature Tool (EBNT).</u> Added new recommendation to Principle ESP4: Ecology, arboriculture and urban greening: <u>Development should consider biodiversity in the wider site design and aim to secure biodiversity net gain.</u>
	19. National Grid	Draft SPD	We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.	Comments noted.	No change
	20. Historic England	Draft SPD	Absence of heritage assets within the Growth Area. Welcome the urban design approach set out in the draft SPD. Comments are limited in nature. However stress that given the potential heights of new development across some of the	Welcome support of our urban design approach. The draft SPD has been informed by the Tall Building Strategy and the Brent Design Guide SPD1. Any likely impacts of	No change

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			component sites, it will be important to ensure that appropriate assessment and understanding of likely impacts on areas beyond the Growth Area itself are part of the process.	development on areas beyond the Growth Area can be looked at as part of the planning application process.	
	Historic England	Chapter 3: Planning policy overview, Chapter 6: Urban Design Framework	As a result, we consider that policies BD1 (Good Urban Design) and BD2 (Tall Buildings) should be included in section 3.1 Planning Policy Overview, so that all stakeholders are clear of their importance in the process of designing such buildings and ensuring that no adverse impacts occur as a result of their development. A clear requirement for tall building proposals should consider and avoid adverse impacts beyond the sites in question wherever possible should be included within bullet point three of DP1 at page 65.	We have included reference to Brent Design Guide SPD1 and Tall Building Strategy 2021 in section 3.1.13 Other Relevant Planning Policies and Guidance. The SPD should be read in conjunction with these policies while planning for individual sites. We agree that the SPD should provide a height plan consistent with the Tall Buildings Strategy recommendations to provide further guidance to future proposals. We will include a recommendation for tall building proposals to avoid adverse impact within the 6.2 Character Area section and para 4.6.4.	<p>Section 5.2 masterplan capacity study scenarios: Add heights plan in Preferred optimised co-location Option 3</p> <p>New text: 4.6 Environment-Heritage 4.6.4 <u>Additionally, NSGA has been identified for 'Tall Buildings' and any development must respond and plan for impacts on surrounding townscape.</u></p> <p>6.2 Character Area section - Character Area tables 13, 14, 15, 16, and 17: Add new text considering adverse impacts of tall buildings as below:</p> <p><u>Tall Buildings within developments must consider the potential for adverse impact on the surrounding townscape and respond appropriately to mitigate such impacts.</u></p>
18.	Sport England	DP5 Recreational needs	DP5 recommendation- Sport England welcomes the intention to provide new facilities or retain the existing however in order to align with national policy and Sport England Policy the existing facilities should be retained/improved unless strategically identified as surplus to the borough's current and future needs and any new provision should meet any existing deficit of provision within the borough or meet projected future needs. Highlight that there could be a need to retain the existing facilities and provide new provision. Strongly recommends that the wording in DP5 Recommendations is amended to reflect this position so that the SPD is compliant with the NPPF, in particular paragraph 99.	<p>Principle DP5 recommendations require CNWL Site 3 to provide new or retain existing indoor and outdoor sports facilities, including MUGAs/outdoor gyms.</p> <p>CNWL site will deliver a comprehensive mixed-use development. Given London Plan's approach to making the best use of land and Policy D3 Optimising site capacity through a design-led approach, it is considered inappropriate to retain existing sports facilities that might prove to be a constraint to the development of the site. As a result, whilst sports facilities will be required under redevelopment; the determination of whether it is appropriate to retain as it is or re-provide onsite or elsewhere will be based on the assessment of future needs. The Local Plan evidence-based will inform the type of sports facilities to be delivered as part of comprehensive development.</p> <p>The Council's Local Plan evidence base: Open Space, Sports and Recreation Study 2019 assess the current supply and demand factors and considers the potential impact of forecast population growth on future facility needs of the borough. The Indoor Sports have informed the study and Leisure facilities needed assessment in November 2018. Whilst the assessment recognises a</p>	<p>DP5 Recommendations:</p> <ul style="list-style-type: none"> - Development on Site 3: C N W L should provide new or retain existing indoor and outdoor sport facilities including M U G As/outdoor gym. <u>The re-provision of the sports facilities should be informed by local need identified in Local Plan evidence base, through public engagement and in partnership with Sport England;</u>

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				<p>deficiency in the sports hall and swimming pools borough-wide, the need for such facilities may change based on local need and type of future occupancy of residents.</p> <p>Sport England's recommendation is considered acceptable that Principle DP5 should identify how the need for the sports facility will be informed. This will be through the Council's evidence base, public engagement with the local residents and in partnership with Sport England at the time of submitting the planning application.</p>	
	Sport England	DP6: Social infrastructure and community needs	<p>DP6 Recommendations- It appears that a 'standards' approach would be adopted regarding the provision of community facilities. Sport England does not support a generalised 'standards' approach as it does not take into consideration the local need for a specific facility in the area. Any new, or retained, facility should be based on robustly identified needs that would then ensure that any facility would be sustainable in the long-term. Strongly suggests DP6 Recommendations are reconsidered so that new sports facilities informed by robustly identified local needs are fully delivered.</p>	<p>The draft SPD identifies the social infrastructure and community needs within principles DP6 and sets out the principles that future developments must adhere to while planning for social and community infrastructure. The approach to community needs must be determined through engagement with the local residents and communities. This will allow for site-specific response and community participation and avoid a 'standard approach'. Individual schemes will need to engage early with the community to understand specific local needs and address them within their detailed design proposal when they come forward for planning.</p>	No change
	Sport England	DP6 Social infrastructure and community needs	<p>Recommend links between the SPD draft and Active Design are developed further and are really drawn out in the SPD by having clear references to Active Design, its principles and the Active Design Checklist within the SPD. Active Design principles and the checklist could be added to any design requirements for proposals. More information on Active Design, including the guidance, can be found via the following link; and http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/activedesign/</p>	<p>The draft SPD embraces some of Active Design principles within its underpinning values and development principles but does not make particular reference to the Active design checklist. DP6 recommendations will be amended to refer to the Active Design checklist.</p>	<p>6.4 Development Principles- DP6- Social infrastructure and community needs:</p> <p>DP6 recommendation text:</p> <ul style="list-style-type: none"> - <u>Developments must plan for active design. Please refer Active Design checklist:</u> <u>http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/activedesign/</u>
22.	West London Alliance (WLA)	General	<p>Extremely grateful for the extensive discussions with your team during the preparation of the draft Masterplan and for the recognition of the importance of the WLO that runs through it. A plan-led, masterplan approach of the kind you are taking in Neasden is an important element in ensuring both that the benefits of the project are maximised and that the case for the WLO can be clearly demonstrated. Agree Neasden is a place with considerable potential and support the ambitious approach the Council is proposing – strongly welcome the recognition of the importance of the WLO in helping to deliver it.</p> <p>The draft Masterplan sets out in clear, practical terms how the WLO will support delivery of these objectives in Neasden – and the Council's vision for the Growth Area set out in paragraph 2.1.1. Strongly support both the Vision and the objectives set out in section 2.2 to deliver it – in particular the objective to maximise the benefits of the WLO line and to</p>	<p>We welcome your support on the plan-led masterplan approach for the draft NSGA masterplan SPD and thank you for engaging with us during its preparation. The SPD recognises and acknowledges the opportunities and benefits the WLO will bring to NSGA. We welcome support on the Council's vision for growth in NSGA, and the vision and objectives set out within the draft NSGA Masterplan SPD to realise this.</p>	No change

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			support closer working between TfL, the WLA and other stakeholders to unlock the potential of key development sites.		
	West London Alliance (WLA)	Para 2.4.3	Paragraph 2.4.3 might refer to the Great West Corridor Opportunity Area alongside the others served by the WLO. This may be of particular importance in giving media and tech occupiers of workspace in Neasden better access to the strategic cluster of these sectors in the “Golden Mile” in Hounslow. The Opportunity Area could also be shown in figure 3 .	We can include reference to the Great West Corridor opportunity Area in the text for para 2.4.3 and access to wider opportunities with improved public transport accessibility. However, Figure 3 is a high-level diagram taken from the Mayor's Transport Strategy 2018 and shows the strategic route of the WLO. At this scale, reference to the individual opportunity areas has not been made in the transport strategy; hence, we cannot show this in fig 3 .	Para 2.4.3: Add Text: <u>2.4.3: The WLO will help improve access to 'Great West Corridor Opportunity Area' and other opportunity areas accessed via the WLO route.</u>
	West London Alliance (WLA)	Chapter 4: Para 4.4.6	In paragraph 4.4.6 it may be better if reference was made to the WLO serving a station at Old Oak Common Lane to avoid confusion with the nearby Old Oak Common station that will serve the Elizabeth line and HS2.	Para 4.4.6 will be amended to reflect Old Oak Common Lane.	Para 4.4.6: Amended to reflect <u>Old Oak Common Lane</u> in place of Old Oak Common
	West London Alliance (WLA)	Chapter 4: Figure 16	Figure 16 identifies two “poor nodes”, one of which covers the proposed location for the proposed WLO station on Neasden Lane. The text does not explain what is meant by this term and it might be helpful to explain it so the issues involved can be taken into account in developing proposals for the station.	Figure 16 identifies poor nodes as a constraint to the movement network in connection with traffic conflicts and pinch points, and as such, do not impact the WLO station design proposal.	No change

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Page 151	West London Alliance (WLA)	Chapter 5: pg. 53	On page 53 , it might be helpful to be clear in the first paragraph of the “Preferred Option” that Option 3 is the best with the WLO as well as before. This is made clear in the “Summary” box, but as it stands the wording may be slightly ambiguous.	Since the delivery of the WLO is not guaranteed at this point, and the Council must plan for development outpacing its delivery, our preference is for optimised co-location option 3, the quantum of development that can be achieved before the WLO comes forward. The text in sections 5.1 and 5.2 pertaining to growth capacity will be amended as “before” and “after” the WLO. Additionally, the preferred option text and summary box (pg. 53) will be revised to justify our preference at this time. The Council remains supportive of the WLO; option 3 safeguards land for the WLO if it were to come forward and provides flexibility if the circumstances were to change. Section DP7 (pg. 68) require development proposals to contribute to the proposed WLO line.	5.2.11. Having tested a number of different scenarios to understand and establish the appropriate quanta of development for NSGA, both before and after the WLO coming forward, the Council is taking forward the optimised co-location scenario as its approach to future development. Option 1, 2a, 2b, 4, 5a, and 5b present significant delivery challenges, especially with identified constraints to movement network and lack of industrial traffic segregation with more vulnerable road users. Optimised co-location options 3 (before WLO) and 6 (after WLO) offer the best outcome with optimised housing delivery and industrial capacity on podium floors segregating industrial traffic with more vulnerable uses. The Council is supportive of the WLO coming forward, but with WLO not guaranteed, the Council must plan for developments outpacing its delivery. Therefore at this time, the optimised co-location option 3 before the WLO will inform the design principles and assumed quanta of development of schemes that come forward for development in short to medium term. Consequently, the urban design framework set out in Section 6 is based on Optimised co-location option 3. Should it be evident that the WLO will proceed, it is likely that the SPD will be reviewed. Prior to this review occurring, option 6 would form the basis of changed assumptions about potential development capacity on individual sites.
	West London Alliance (WLA)	Chapter 6: pg. 62, Site 1 Development Amount table	In the table on page 62 dealing with the McGovern site, it may be worth mentioning that the proposed WLO station will have to meet relevant requirements and guidance about station accessibility. It will also be important that the station entrance is clearly visible from the street.	Table for Site 1 (McGovern Yard Site) pg. 62 will be amended to reflect suggestions for the proposed WLO station to meet relevant requirements and guidance about station accessibility and that the station entrance is visible from the street.	Table for Site 1 (McGovern Yard site) pg.62 Transport infrastructure- Add text <u>Proposed WLO station to meet relevant requirements and guidance regarding station accessibility. The station entrance must be clearly visible from the street.</u>
	West London Alliance (WLA)	Chapter 6: pg. 62, para 6.4.5, para 6.4.2, DP7: Movement and accessibility	On page 65, the reference to the WLO in paragraph 6.4.5 could be made immediately after paragraph 6.4.2 , as the project will present opportunities across a number of the development principles set out in section 6.4.	Para 6.4.5 refers to the opportunity WLO offers to maximise the potential for the sites through industrial intensification and residential co-location with improved accessibility to public transport, which aligns closely with the principles set out within DP1: Maximising the potential for the sites. However, it is not the only objective of DP1; it has not been referred immediately after 6.4.2, as mentioned in the comments.	No change
	West London Alliance (WLA)	DP7: Movement and accessibility	Strongly welcome the support for safeguarding the site for the proposed Neasden station in the recommendations supporting development principle 7 .	Welcome support of DP7 and safeguarding of WLO site.	No change

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23.	Thames Water utilities	Chapter 4:section 4.9 constraints, Chapter 6:section 6.3 Development Amount, 6.5 Environment and Sustainability principles - ESP6: Water management	Thames Water will need to retain unrestricted access to ensure that critical assets can be operated and maintained. As such this access will need to be factored into development proposals for the area. In relation to the strategic mains which cross the growth area, given the size of the mains, development may need to be located 10-15m from the assets and burst/flooding reports will be required to understand the impact of any potential bursts on new development.	Below ground utilities have been identified in Chapter 4 Today's Neasden- section 4.9 constraints . Taking account of the identified potential constraint that water infrastructure may have, further details will be added within this section regarding site-specific underground Thames Water utility constraints (including map) and impacts to development. Site-specific mitigation measures will be included in Tables for Site 1 and 2 within section 6.3 Development Amount .	Section 4: Today's Neasden: 4.9 Constraints: Map included to show Thames Water below-ground utilities. (As provided with rep). Figure 16 Constraints map and legend revised to show Thames Water below-ground utilities. 4.9 Constraints summary Add Text: <u>Significant constraint from below-ground utilities (Thames Water)</u> Section 6.3 Development Amount for Site1 and Site 2 site specific considerations and ESP6 Recommendation: Add text: <u>Development must consider groundwater utilities/assets and be located 10-15m from the assets/mains. Flooding reports will be required to understand the impact of any potential bursts on new development.</u> 6.5 Environment and Sustainability principles -ESP6: Water management recommendation: Add text: <u>Development must ensure that existing below groundwater infrastructure is protected during construction.</u>
Page 152	Thames Water utilities	Section 5.2: Masterplan growth capacity scenarios: Option 3, Fig. 23	This constraint is likely to impact on development shown in the preferred Masterplan Option 3 shown in Figure 23 of the consultation document and it is considered the proposals should be revised to take account of existing critical below ground water infrastructure. Impact of the proposals on the existing water and wastewater infrastructure to ensure the final masterplan and SPD takes due consideration of these constraints and to help ensure that any upgrades to water and sewerage networks necessary to support growth can be programmed to align with the delivery of growth. Support the requirements set out in ESP6: Water Management and in particular the requirement for all proposals to be informed by discussions with utility providers.	The draft NSGA Masterplan SPD presents high-level masterplan growth capacity scenarios and does not prescribe the design for the sites. Option 3, Figure 23 , is assumed to be on podium floors, meaning industrial yard space can be planned in areas impacted by underground utilities. However, individual schemes will be assessed once they come forward for planning and need to adhere to the principles set out in ESP6: Water management that clearly states future proposals for development within NSGA will need to consider the connection to utility infrastructure at the earliest stage of an application.	No change
	Thames Water utilities	Section 9.1 Pre-application advice	Discuss developers proposals with them ahead of the submission of any applications to ensure that any necessary upgrades to water and sewerage network infrastructure can be aligned with development. Further point should be added to the recommendations to state the following: "Development must ensure that existing below ground water infrastructure is protected during construction." Consider additional text in Section 9.1 on pre-application advice- developers should also engage with other stakeholders including Thames Water ahead of the submission of any planning applications; https://www.thameswater.co.uk/developers	All development proposals will need to be informed by discussions with utility providers and informed by ground investigation. A further point will be added in ESP6 recommendation to state: "Development must ensure that existing below ground water infrastructure is protected during construction."	6.5 Environment and sustainability principles- ESP6 Water Management recommendation: - <u>Development must ensure that existing below ground water infrastructure is protected during construction.</u>

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24.	Greater London Authority (GLA)	Draft SPD	<p>General:</p> <p>1.1 Welcomes the development of the Neasden Stations Growth Area Masterplan SPD (NSGA SPD) and the use of a plan-led approach and scenario testing to optimise housing.</p>	<p>General:</p> <p>1.1 We welcome your support in developing the draft SPD. The SPD has been informed by a plan-led approach to optimising housing delivery through co-location with industrial uses in line with the London Plan and the Local Plan objectives.</p>	No change
	Greater London Authority (GLA)	Chapter 5	<p>Good Growth:</p> <p>1.2-1.4 Aligns well with the London Plan objectives for good growth and support for vision set out within the SPD. Include a summary of the capacity study scenarios at the start of Chapter 5 with key information on headline capacity figures, the infrastructure requirements needed for each scenario, LB Brent's preferred option and justifications that support the preferred option. The limitations to the capacity methodology should be clearly set out and caveats may be required where evidence is limited. Ensure that the supporting infrastructure is identified upfront and delivered from the outset (or phased appropriately).</p>	<p>Good Growth:</p> <p>1.3 Welcome support of the vision set out within the draft SPD. The masterplan options are high-level growth capacity scenarios 'before' and 'after' the West London Orbital (WLO) link. Having tested a number of different scenarios to understand and establish the appropriate quanta of development for NSGA, both before and after the WLO coming forward, the Council is taking forward the optimised co-location scenario as its approach to future development.</p> <p>Chapter 5: 5.2 Masterplan capacity study scenarios: Option 1, 2a, 2b, 4, 5a, and 5b present significant delivery challenges, especially with identified constraints to movement network and lack of industrial traffic segregation with more vulnerable road users, as noted later in the rep. and therefore do not present as the appropriate option for NSGA. Optimised co-location options 3 (before WLO) and 6 (after WLO) offer the best outcomes with optimised housing delivery and industrial capacity on podium floors segregating industrial traffic with more vulnerable uses. Albeit the Council is supportive of the WLO coming forward, but with WLO not guaranteed, the Council must plan for development outpacing its delivery. Hence our preference is for optimised co-location option 3, which optimises housing delivery alongside providing industrial capacity to conform to both the London Plan and Local Plan objectives.</p> <p>The text in sections 5.1 and 5.2 pertaining to growth capacity will be amended to say "before" and "after" WLO. Additionally, the preferred option text and summary box (pg. 53) will be revised to provide justification for our preference at this time. Our preferred option 3 forms the basis of the urban design framework (Section 6), which sets out each site's development amount and infrastructure requirements in the tables on pg. 63-65.</p> <p>1.4 Noted. The text in Chapter 5 will be amended to reflect WLO currently unfunded status and subsequently our preference for optimised co-location option 3 before the WLO. Chapter 4 Today's Neasden identifies NSGA's infrastructure needs, and Section 6.3 Development</p>	<p>5.2 Masterplan Capacity Study scenarios:</p> <p>Para 5.2.11 Preferred masterplan growth capacity option 3 summary box (pg53) will be revised to include text justification for this option and its preference at this time as follows:</p> <p>5.2.11. Having tested a number of different scenarios to understand and establish the appropriate quanta of development for NSGA, both before and after the WLO coming forward, the Council is taking forward the optimised co-location scenario as its approach to future development. Option 1, 2a, 2b, 4, 5a, and 5b present significant delivery challenges, especially with identified constraints to movement network and lack of industrial traffic segregation with more vulnerable road users. Optimised co-location options 3 (before WLO) and 6 (after WLO) offer the best outcome with optimised housing delivery and industrial capacity on podium floors segregating industrial traffic with more vulnerable uses. The Council is supportive of the WLO coming forward, but with WLO not guaranteed, the Council must plan for developments outpacing its delivery. Therefore at this time, the optimised co-location option 3 before the WLO will inform the design principles and assumed quanta of development of schemes that come forward for development in short to medium term. Consequently, the urban design framework set out in Section 6 is based on Optimised co-location option 3. Should it be evident that the WLO will proceed, it is likely that the SPD will be reviewed. Prior to this review occurring, option 6 would form the basis of changed assumptions about potential development capacity on individual sites.</p>

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				<p>Amount further provide site-specific infrastructure requirements.</p> <p>Notwithstanding, the SPD offers sufficient flexibility for change of circumstances while planning for future infrastructure requirements. Additionally, an infrastructure delivery plan is being prepared to identify the requirements and delivery/ implementation of both site-specific and strategic infrastructure needs for NSGA to bring comprehensive development to the area.</p>	
Page 154	Greater London Authority (GLA)	Chapter 1-4	<p>Challenges and Opportunities</p> <p>1.5-1.6 Approach welcome on Chapters 1 to 4 of the SPD in clearly establishing the opportunities and background context for NSGA. Benefit from section setting out policy requirements and potential challenges upfront. (Funding status of WLO, safeguard waste site, design sensitivities/agents of change principle, and constraints to views).</p>	<p>Challenges and Opportunities</p> <p>1.5. We welcome support for our approach. 1.6. Noted. The policy overview chapter 3 will be amended to reflect the funding and project status of WLO. Details on safeguarded waste sites have been covered in 6.5 Environment and Sustainability principles- ESP9 Waste management that set out clear policies and principles that future development must adhere to regarding safeguarding the waste site. Design sensitivities and agents of change principles have been referenced in 6.5 Environment and Sustainability principles- ESP3: Noise and other nuisance. There are no impacts to protected views, and hence no reference is made. However, it recommends the enhancement of the viewing corridor to the west towards Wembley Stadium. A note will be added in section 4.8 Topography and views with regards to the protected view to Wembley Stadium over the bridge.</p>	<p>Chapter 3: Add text:</p> <p><u>3.1.14 West London Orbital (WLO):</u></p> <p><u>The proposals for the West London Orbital aims to link Hendon/Brent Cross/ Cricklewood/ West Hampstead in the northwest to Hounslow in the west. The route would provide orbital connection across North and West London, unlocking the potential for new jobs and homes, connecting to town centres, employment hubs and existing and future transport links to London Underground, London Overground, Elizabeth Line, National Rail and High Speed 2 interchanges.</u></p> <p><u>TfL and the WLA are assessing a full range of options that could enable sustainable growth, improve connectivity and increase public transport capacity in west London. The WLO is currently at the feasibility stage, and TfL and the WLA are working together to identify a range of funding mechanisms that could be used to secure funding for the scheme.</u></p>
	Greater London Authority (GLA)	Chapter 3	<p><u>Status of the SPD and relation to the Local Plan</u></p> <p>1.7-1.8 The Mayor of London, through the Greater London Authority, raised issues related to industrial land in his representations to the Regulation 19 draft Brent Local Plan and subsequent response to the draft Brent Local Plan's Inspectors' Matters, Issues and Questions (MIQs).</p>	<p><u>Status of the SPD and relation to the Local Plan</u></p> <p>1.7 - 1.8 comments noted. Chapter 3 policy overview para 3.1.4 within the draft SPD clearly notes the status of the SPD in relation to the Brent Local Plan. The NSGA Masterplan SPD will only be adopted after the new Brent Local Plan is adopted.</p>	No change
		Chapter 5-7	<p><u>Delivery, phasing and funding mechanisms</u></p> <p>1.9-1.13. Where a proposed development exceeds the capacity in the site allocation or is not allocated, and the borough considers the 'baseline' infrastructure capacity will be exceeded, additional infrastructure proportionate to the development is required through the development. Where development proposals are submitted prior to funding commitment for WLO, the SPD could require proposals to be</p>	<p><u>Delivery, phasing and funding mechanisms</u></p> <p>1.9-1.13. The three scenarios tested before and after the WLO are high-level growth capacity masterplan options to establish the quanta that can be achieved for each scenario. Our preference is for optimised co-location option 3, which optimises housing delivery alongside providing industrial capacity to conform to both the London Plan and Local Plan objectives.</p>	No change

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			future proofed to allow for later intensification of sites by ensuring spatial provisions are factored in upfront which would not preclude the ability to accommodate higher densities or future transport improvements at later phases of the development. The chapter should provide clarity that any funding package for new or improved public transport connections is likely to include contributions from new residential and commercial developments that the new/improved public transport routes would serve. Such obligations and contributions may include the provision of new and improved public transport services, the expansion of cycle networks and public realm improvements, in line with the Healthy Streets Approach.	This preference aligns closely with London Plan Policy D3. At this stage, WLO is not committed to funding, and hence our preference for option 3 and subsequent chapter 6-urban design framework that includes development, sustainability and environment principles is based on option 3. The Council remains supportive of the proposed WLO, notwithstanding the delivery is not guaranteed, and the Council must plan for circumstances in which development in the area outpaces its delivery. However, the infrastructure and spatial provisions outlined in this section factor in higher densities and future growth/intensification envisaged after the WLO (option 6), if it were to come forward at a later stage, to allow future-proofing of sites within the NSGA.	
Page 155	Greater London Authority (GLA)	Chapter 2	<u>West London Orbital (WLO)</u> 1.14 The SPD could expand on other key benefits of the WLO in linking several Opportunity Areas, encouraging a modal shift from car and supporting more sustainable development, unlocking regeneration opportunities, and enabling more direct public transport access to local employment centres and amenities, including major employment hubs such as those in Old Oak OA, Hounslow OA and Brent Cross OA.	<u>West London Orbital (WLO)</u> 1.14 The opportunities and key benefits from the WLO have been clearly identified in section 2.4 opportunities, and figure 3 shows the different opportunity areas. This figure has been referenced from the Mayors Transport Strategy 2018.	No change
	Greater London Authority (GLA)	General	<u>Wembley Opportunity Area (OA)</u> 1.15- 1.17 Sites in the SPD that lie within the Wembley OA should be clearly distinguished and should reflect how the sites help to meet this indicative capacity over the plan period of Brent's draft Local Plan. If the Wembley Growth Area corresponds to the London Plan's indicative boundary of Wembley OA, this should be made clearer in the SPD and treated differently from other areas in Brent as it is of strategic importance for the whole of London.	<u>Wembley Opportunity Area (OA)</u> 1.15-1.17 Wembley Opportunity Area boundary has been updated in the policy map to exclude the McGovern site within its boundary.	No change
	Greater London Authority (GLA)	General	<u>Industrial Land - McGovern Yard Site</u> 1.18-1.19 As the outcome of the draft Local Plan is yet to be determined, the SPD should be clear that it cannot change policies or introduce new planning policies to Brent's development plan, and that co-location of non-industrial uses on SIL, as demonstrated in the capacity study scenarios, is not acceptable until the de-designation of SIL to LSIS is formalised through the adoption of the Local Plan. Any release of industrial land to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in London Plan Policy E7 and E5.	<u>Industrial Land - McGovern Yard Site</u> 1.18-1.19 Comments noted. The SPD will not be adopted until the outcome of the Local Plan is determined. . In collaboration with the GLA, the draft SPD has been informed by a master planning approach to facilitate industrial intensification, co-location, and substitution in line with policy E7 and E5 of the London Plan.	No change

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	Greater London Authority (GLA)	Chapter 6	Safeguarded waste site 1.20-1.22 The McGovern Yard site is safeguarded waste site in the West London Waste Plan (2015) and the proposed downgrading of SIL to LSIS could negatively affect its ability to effectively operate 24 hours, 7 days a week, through the introduction of non-industrial uses, including residential elements. The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable output of the site proposed to be lost.	1.20- 1.22 Safeguarded waste site- Chapter 6.5 Environment and sustainability principle- ESP9 Waste Management clearly identifies the site as protected under London Plan policy S19 safeguarded waste site and development for non-waste uses will only be considered on land in existing waste management use if the compensatory and equal provision of waste capacity, in scale and quality, is made elsewhere within the West London Boroughs. This has also been identified on the 6.3 Development Amount for Site 1: McGovern Yard site (pg63) .	No change
	Greater London Authority (GLA)	General	Industrial land 1.23- 1.26 The outcome of the draft Local Plan is yet to be determined and the SPD's intention to introduce non-industrial uses on SIL as co-location is therefore considered premature at this stage.	1.23 - 1.26 Industrial Land: Comment noted. The draft SPD will only be adopted once the Brent Local Plan is adopted.	No change
	Greater London Authority (GLA)	Draft SPD	Tall buildings 1.27-1.28 The approach to Tall Buildings is welcomed, subject to the Mayor's response on LB Brent's Local Plan Main Modifications consultation.	1.27-1.28 Tall Buildings- We welcome your support on the NSGA being identified as tall buildings zone, as set out within the Tall building Strategy 2020.	No change
Page 156	Greater London Authority (GLA)	Chapter 5 and 6	Key masterplan and design issues- Masterplan capacity studies 1.29-1.38 The capacity studies illustrated in the SPD reveal potential design challenges related to movement, use distribution, public realm, street hierarchy and potential high levels of conflict between industrial and residential users which would result in compromised solutions for both sets of users. This could be resolved by developing a clear residential/industrial front and back strategy that informs the capacity study and by clarifying the types and location of industrial uses proposed. While it is noted that the capacity work does not represent the only possible masterplan response, further work is needed to demonstrate that a functional layout can be achieved which provides adequate separation of industrial and residential access routes, particularly for heavier industrial uses. GLA officers are of the view that horizontal co-location and intensification of retained industrial sites may enable more straightforward residential development opportunities closer to the station and may be a more appropriate approach for heavier industrial uses. <i>Public realm and street hierarchy</i> - The urban design framework could be strengthened by providing clearer guidance on the location of key public realm spaces required to support high density developments proposed in the study area. <i>Movement strategy</i> - The layout of the capacity study appears insufficiently resolved and illustrates streets that are shared by both industrial and high-density residential uses. The	The growth capacity studies for the three scenarios tested before and after the WLO are high-level masterplan capacity study options to establish the quanta that can be achieved for each of these scenarios. The Council is taking forward the optimised co-location option 3. This option conforms to both the London Plan and the Brent Local Plan and optimises/ maximises the residential development and industrial capacity. This option is viable and deliverable and maximises the outcomes for NSGA whilst responding to significant constraints and challenges on these sites. Chapter 5.2 masterplan capacity study scenarios: Options 1, 2a, 2b, 4, and 5a and 5b have significant delivery challenges and do not maximise the outcomes for NSGA to meet the London Plan and Local Plan objectives. Furthermore, the delivery of WLO is not guaranteed, and the Council must plan for development to outpace its delivery. The draft SPD does not prescribe the detailed design for the sites but sets out the wider urban design framework, including development, environment, and sustainability principles that will guide the future comprehensive development of the area. The SPD seeks to provide clarity and certainty on key requirements and outcomes while providing sufficient flexibility to allow for potential changes in circumstances. Individual schemes will be evaluated on their merit and how they bring comprehensive development to the area.	3.1 Planning Policy Overview: Other relevant planning policies and guidance: - <u>3.1.13 Reference to Good quality Homes for all Londoner's guidance.</u> 5.2 Masterplan Capacity Study scenarios: Para 5.2.11 Preferred masterplan growth capacity option 3 summary box (pg53) will be revised to include text justification for this option and its preference at this time as follows: <u>5.2.11. Having tested a number of different scenarios to understand and establish the appropriate quanta of development for NSGA, both before and after the WLO coming forward, the Council is taking forward the optimised co-location scenario as its approach to future development. Option 1, 2a, 2b, 4, 5a, and 5b present significant delivery challenges, especially with identified constraints to movement network and lack of industrial traffic segregation with more vulnerable road users. Optimised co-location options 3 (before WLO) and 6 (after WLO) offer the best outcome with optimised housing delivery and industrial capacity on podium floors segregating industrial traffic</u>

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	Greater London Authority (GLA)	Chapter 5 and 6	<p>Industrial Intensification and Co-location Study provides further guidance on industrial typologies and design. The preferred option presented in the SPD is the “optimised co-location scenario, before WLO”, where a growth capacity of 2,338 residential units are attributed to the study area. Associated economic baseline work that underpins the scale and types of proposed industrial spaces in the capacity study should be referenced in the SPD.</p> <p><i>Use distribution</i> - The location of heavier industrial uses (B2 and B8) is not defined in the SPD. These suggest that a more strategic approach to the study area and industrial capacity in the borough should be taken. The industrial capacities tested in the SPD should relate to a wider borough level or SIL area (i.e. Wembley SIL) approach. This should be considered early in the capacity scenarios as these uses have specific requirements to enable their functioning, such as yard space provision, HGV access and large service entrances along main frontages. The legend in the masterplan options indicates that A1/A2 uses could be applied across all residential areas in the masterplan. The location of commercial and retail uses should be clarified in the drawings. Local studies that support design decisions should be referenced in the SPD. As Use Class A 1/2/3 have been revoked and replaced with Use Class E, for clarity the chapter should be updated to reflect this.</p> <p><i>Residential typologies</i> - Neasden Triangle and Neasden Works are identified as character areas that could accommodate 8-14 storey mid-rise apartment blocks. The proposed upper range is seen as substantial for mid-rise blocks. This may result in challenges to achieving adequate daylight and sunlight into homes, open spaces and streets. To help ensure closer alignment with the London Plan, officers recommend referring to the residential typologies and parameters set out in the Good Quality Homes for All Londoners guidance.</p>	<p>However, the infrastructure and spatial provisions outlined in this section factor in the higher growth capacity (after WLO option 6) and future growth/intensification envisaged with the WLO, if it were to come forward at a later stage, to allow future-proofing of sites within the NSGA. The text on our preferred option will be revised to indicate this approach and justify option three as our preferred option. As such, the growth capacity testing options are high level and not in any form a single blueprint for development.</p> <p>With development capacity and viability at NSGA contingent on several variable factors, such as the delivery of the WLO line, quantum of industrial uses and changes in policies, the quantum of commercial uses, type of residential co-location and extent of development sites, it has been necessary to undertake masterplan growth capacity studies that test a number of different scenarios but providing detailed masterplan design at this stage was not deemed the right masterplan approach. Hence the growth capacity masterplan studies consolidate these outcomes into a robust urban design framework. This seeks to provide clarity and certainty on key requirements and outcomes whilst providing flexibility for changes in future circumstances. All key stakeholders- GLA, TFL, WLA, Landowners, developers and ward councillors were engaged throughout the process.</p> <p>Individual schemes will be evaluated on their merit and how they bring comprehensive development to the area whilst responding to the constraints identified in chapter 4 and subsequent development. Sustainability and environmental principles set out in chapter 6 establish clear principles that should underpin any future developments with NSGA. Chapter 6.2 further outlines the character areas for the sites within the NSGA, with details of land use, street width, street types and connectivity, building type, height, massing, landscape etc. which is expected as part of future development in the area.</p> <p>The capacity testing options provide greater flexibility and are compliant with both the London Plan and the Brent Local Plan. Additionally, Option 1, 4, 2 (a and b), and 5 (a and b) have significant delivery challenges, especially regarding segregation of movement network and industrial traffic with more vulnerable users of the road. Our preferred option 3 is on podium floor level with industrial below podium and some commercial/residential vertically co-located; this provides segregation of industrial traffic with more vulnerable users of the road. Option 3 optimises housing and industrial capacity and conforms to the London Plan and Local Plan objectives.</p>	<p><u>with more vulnerable uses. The Council is supportive of the WLO coming forward, but with WLO not guaranteed, the Council must plan for developments outpacing its delivery. Therefore at this time, the optimised co-location option 3 before the WLO will inform the design principles and assumed quanta of development of schemes that come forward for development in short to medium term. Consequently, the urban design framework set out in Section 6 is based on Optimised co-location option 3. Should it be evident that the WLO will proceed, it is likely that the SPD will be reviewed. Prior to this review, option 6 would form the basis of changed assumptions about potential development capacity on individual sites.</u></p> <p>Figure 18, 19, 20, 21, 22, and 23 legends (pg.47-52): Reference to A1/A2 uses will be removed on all masterplan capacity options legends and replaced with Class E where commercial/retail use is indicated.</p>

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				The masterplan capacity options legend will be revised to show class E uses where the commercial /retail uses are indicated. The draft NSGA Masterplan SPD seeks to support B2 and B8 industrial uses aligning with policy E4, E6 and E7 of the London Plan and policy BE2 of the new Local Plan. All future proposals will need to adhere to the guidance set out in the Tall Building Strategy and Brent Design Guide SPD1 that provide detailed guidance on daylighting, open space and streets. Reference to Good quality Homes for all Londoner's guidance will be made in Chapter 3 – Other relevant planning policies and guidance.(Para 3.1.13)	
25.	Environment Agency (EA)	ESP1 Resilient and efficient development	<u>Climate resilience and Net Zero Carbon:</u> Support for policy ESP1 . Relevant to refer to London Plan (2021) Policy GG6 Increasing efficiency and resilience.	<u>Climate resilience and Net Zero Carbon:</u> We welcome your support on ESP1 Resilient and efficient development and reference preparing for a changing climate: Good Practice in this section. Reference to London Plan (2021) Policy GG6 Increasing efficiency and resilience, as well as Policy S12 Minimising greenhouse gas emissions, will be included.	ESP1 recommendation: - <u>Refer to preparing for a changing climate: Good Practice.</u> - <u>Refer to London Plan (2021) Policy GG6 Increasing efficiency and resilience, as well as Policy S12 Minimising greenhouse gas emissions.</u>
Page 158	Environment Agency (EA)	Air Quality, Chapter 3	<u>Air Quality:</u> Support development principle ESP2: Air Quality. Section 3.1 Planning Policy Overview , we would expect to see reference made to London Plan Policy SI1 Improving Air Quality.	<u>Air Quality:</u> We welcome support on ESP2: Air Quality and section 4.6.1. We will reference London Plan Policy SI1 Improving Air Quality in section 3.1 planning policy overview .	6.5 Environment and sustainability principles ESP2: Air Quality recommendation text: - <u>Refer to London Plan (2021), Policy GG6 Increasing efficiency and resilience, Policy S12 Minimising greenhouse gas emissions.</u> 3.1 Planning policy review: 3.1.13 other relevant policy: Reference London Plan Policy SI1 Improving Air Quality.
	Environment Agency (EA)	ESP4: Ecology, arboriculture and urban greening.	<u>A Green Place – Ecology & Green infrastructure:</u> Support for ESP4 . Recommend reference is made to the DEFRA Biodiversity Metric 3.0 (published July 2021) to help development project to calculate biodiversity net gain. Recommend that the SPD references the London Plan's Urban Greening Factor (Policy G5). SPD to be evidenced by, and reference, the Green Infrastructure Focus Map and LNRS. (Local nature recovery strategies) to help planning authorities to identify strategic investments in local habitats.	<u>A Green Place – Ecology & Green infrastructure:</u> We welcome support on ESP4: Ecology, arboriculture and urban greening . We will reference DEFRA Biodiversity Metric in this section, as noted. We will reference the green infrastructure focus map in the context of landscaping, public realm and ecology in this section.	ESP4: Ecology, arboriculture and urban greening: Recommendation text: - <u>Refer to DEFRA Biodiversity Metric and green infrastructure focus map in the context of landscaping, public realm and ecology.</u>
	Environment Agency (EA)	ESP5: Ground conditions	<u>Groundwater Protection:</u> Support ESP5: Ground conditions . Inclusion of Suds from a groundwater perspective.	<u>Groundwater Protection:</u> We welcome the support of ESP5 . The draft SPD has outlined the need for the provision of Suds' across all the sites. This is clearly indicated in section 6.2 character area under tables 13-15.	ESP9: Waste management: Recommendation text: - <u>Refer to London Plan Policy SI8 Waste capacity in this section.</u>
	Environment Agency (EA)	ESP6: Water management	<u>Water Management:</u>	<u>Water Management:</u>	ESP6: Water management: Recommendation text:

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			Support ESP6: Water management . Use of water efficiency measures and higher standards of a maximum of 110 litres per person per day is applied as the water consumption limit for all new residential development. All new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.	We welcome support for policy ESP6: Water management . We will reference water efficiency measures, and higher standards of a maximum of 110 litres per person per day are applied as the water consumption limit for all new residential development. In this section, all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.	- <u>Water efficiency measures and higher standards of a maximum of 110 litres per person per day is applied as the water consumption limit for all new residential development. All new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.</u>
	Environment Agency (EA)	Section 2.3 Our Values: A Green Place, ESP7: Open space and amenity	<u>Open Space and Public Realm</u> Support ESP7: Open space and amenity . Refer London Plan Policy G5 for Urban Greening Factor in section 2- A green place .	<u>Open Space and Public Realm</u> We welcome support for ESP7: Open space and amenity . We will reference London Plan Policy G5 for Urban Greening Factor in section 2- A green place .	Section 2.3 Our Values: A Green Place: 2.3.22 London Plan Policy G5 for Urban Greening Factor further provides guidance on requirement for urban greening factor for new development.
	Environment Agency (EA)	ESP9: Waste management	<u>Waste management</u> Support ESP9: Waste management . It may be beneficial to also reference London Plan Policy SI8 Waste capacity and net waste self-sufficiency.	<u>Waste management</u> We welcome support for ESP9: Waste management . We will reference London Plan Policy SI8 Waste capacity in section ESP9: Waste management .	ESP9: Waste management. Recommendation text- - <u>Refer to London Plan Policy SI8 Waste capacity in section ESP9: Waste management.</u>
Page 159	Transport for London (TfL) Planning Team	2.1.1	2.1.1 Refer inclusivity for public realm in vision.	Comments noted. 2.1.1 Will be updated to include inclusivity of public realm.	Add text: <u>2.1.1 Redevelopment will be complemented by public spaces and pocket parks, enhanced and high quality inclusive public realm to cater to varied groups and users.</u>
	Transport for London (TfL) Planning Team	2.3.15	2.3.15 Supportive for 15-minute neighbourhood. Reference Healthy Streets indicators; feel safe, easy to cross and consider noise.	We welcome support on 15 min neighbourhoods and will reference Healthy Streets indicators as noted in section 2.3.15 (a connected place). Principle DP7 Movement and accessibility also references Policy London Plan policy T2 for Healthy Streets and modal shift.	No change
	Transport for London (TfL) Planning Team	2.4.10	2.4.10 Crossings need to meet pedestrian desire lines- Directness principle.	Comments noted on 2.4.10 and will be revised to reflect.	<u>2.4.10 Crossing design and locations should be planned such that they meet pedestrian desire lines.</u>
	Transport for London (TfL) Planning Team	Page 11	Page 11: The acronym 'WLA' is used on page 5 but it is only defined on page 11 ('West London Alliance').	Noted and WLA acronym text will be revised on pg. 5 .	WLA acronym text revised on pg. 5
	Transport for London (TfL) Planning Team	Section 4.4	4.4 Explain what PTAL is. Colours used on Figure 10 on page 38 are difficult to distinguish, especially in the legend.	Definition of PTAL will be included in section 4.4 movement and accessibility. TfL colleagues provided figure 10 (pg.38) PTAL diagram , and we will welcome if a clearer image can be provided; we will revise this figure likewise.	Definition of PTAL to be included in section 4.4 movement and accessibility underneath figure 10 as below: <u>Public Transport Access Level is a measure of access to the public transport network. For any given point in London, PTALs combine walk times from a chosen point to the network (stations and bus stops, for example) together with service frequency data at these locations.</u> Figure 10 to be provided by TfL colleagues and updated likewise.

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	Transport for London (TfL) Planning Team	Section 4.4.3	In section 4.4.3 , make clear the N98 is a night bus and therefore only operates every thirty minutes.	Section 4.4.3 will make clear N98 is a night bus operating every 30mins.	4.4.3 Remove original text 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. New text: <u>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 is a night bus, which operates every 30 minutes between Stanmore and Central London.</u>
Page 160	Transport for London (TfL) Planning Team	Section 4.6.4	In section 4.6.4 , only the original northbound ('down') Metropolitan Railway platform remains largely intact (the original southbound ('up') platform was converted into the existing island).	Comment noted. Section 4.6.4 will be revised to reflect.	4.6.4 Remove original text: 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. New text: <u>4.6.4 The original northbound ('down') Metropolitan Railway platform remains largely intact (the original southbound ('up') platform was converted into an existing island.</u>
	Transport for London (TfL) Planning Team	General	Expected analysis on capacity and issues concerning Neasden station, such as the lack of step-free access and the constrained size of the ticket hall and staircase down to platform level. Impact of trip generated on station/train/bus capacity and improvements or enhancements needed to support the scale of proposed development. Identify potential improvements to public transport infrastructure (other than the new WLO station).	In terms of the existing station assessment, this is not part of the draft SPD. However, a separate transport assessment - 'Transport Study Project Brief' (July 2021) has been commissioned to assess the traffic impact generated by NSGA on the local highway and Strategic Road Network and determine if /what interventions and Mitigation measures may be required. Additionally, an NSGA infrastructure delivery plan is being prepared that identifies the site-specific and strategic transport infrastructure including, roads, crossing, junctions and public realm improvements, strategic and local links (including upgrades to Neasden LU Station and local bus network) enhancements, interventions implementation/delivery plan across NSGA.	No change
	Transport for London (TfL) Planning Team	Chapter 7	Ownership map needs to be revised for Site 5 to show LU owned land.	Comments on ownership noted and figure 29 will be revised likewise.	Figure 29 revised
	Transport for London (TfL) Planning Team	Chapter 5	Location of the WLO to be revised on all options as per image below.	Comments noted and all options will be revised with location of WLO as per image provided. Please note the exact location was not confirmed at the time of developing the options and were positioned on the maps only for safeguarding purpose.	Figure 18, 19, 20, 21, 22, 23 revised as per image.

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	Transport for London (TfL) Planning Team	Draft SPD	The language used throughout the document to reflect WLO not guaranteed.	Comments noted and draft SPD language revised where applicable throughout the document	Revise language from (“will” to “would”) to reflect WLO not guaranteed in draft SPD where applicable.
	Transport for London (TfL) Planning Team	Chapter 5	Link between delivering new housing and the delivery of the WLO to be made clear.	Section 5.2.1 notes the masterplan capacity study scenarios which respond to the existing public transport accessibility and an alternative option reflecting the increased accessibility with the WLO. Section 5.2.5, 5.2.8, and 5.2.9 additionally refer to the higher densities due to improved PTAL. Section 5.2.1 text will be revised to reflect the link between delivering new housing and the delivery of WLO.	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 (W L O) line. <u>Option 1, 2a and 2b and 3 are before the WLO scenario with existing PTAL. Option 4, 5a and 5b and 6 are after the WLO scenario. The provision of WLO will improve the public transport accessibility for NSGA and consequently the potential for increased housing densities.</u> The three scenarios tested are: 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).
	Transport for London (TfL) Planning Team	Chapter 6	‘Contributions to ongoing work and delivery of potential Neasden Overground WLO station for all sites.	Contribution to the existing station has been identified in the 6.4 development amount table (pg. 63-65) for all sites, and principle DP7 identifies that any proposals must contribute to the WLO given the projected increase in public transport usage envisaged. 6.4 development tables revised to include a contribution to future WLO stations for all sites.	6.4 All development tables revised to include within site specific requirements- Transport infrastructure - <u>Contribution towards the existing Neasden station and proposed WLO station.</u>
	Transport for London (TfL) Planning Team	Chapter 5	There are various ‘tested’ scenarios in the plan. Scenarios 1 and 2 are based on ‘quanta of development before the WLO provision’. Suggest that the WLO should not appear in scenario 1 and 2 as not deliverable.	The WLO is shown on all options only for safeguarding purposes, and this will be made clear on the capacity study option maps in this section.	Figure 18, 19, 20,21,22,23 maps and legends revised to show safeguarded WLO station.
	Transport for London (TfL) Planning Team	5.2.10	5.2.10- concerned that the ‘preferred option’ for development (Optimised co-location) explicitly excludes WLO provision, particularly as Brent forms part of the WLA and should support WLO provision.	The Council remains supportive of the proposed WLO, notwithstanding the delivery is not guaranteed, and that the Council must plan for circumstances in which development in the area outpaces its delivery. Hence our preference for option 3 in section 5.2.10 . All masterplan growth capacity scenario options safeguard land and access for the WLO. Additionally, the summary box in this section 5.2.11 will be revised to add justification for our preference.	Para 5.2.11 Preferred masterplan growth capacity option 3 summary box (pg53) will be revised to included text justification for this option and its preference at this time as follows: <u>5.2.11. Having tested a number of different scenarios to understand and establish the appropriate quanta of development for NSGA, both before and after the WLO coming forward, the Council is taking forward the optimised co-location scenario as its approach to future development.</u>

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Page 162					<u>Option 1, 2a, 2b, 4, 5a, and 5b present significant delivery challenges, especially with identified constraints to movement network and lack of industrial traffic segregation with more vulnerable road users. Optimised co-location options 3 (before WLO) and 6 (after WLO) offer the best outcome with optimised housing delivery and industrial capacity on podium floors segregating industrial traffic with more vulnerable uses. The Council is supportive of the WLO coming forward, but with WLO not guaranteed, the Council must plan for developments outpacing its delivery. Therefore at this time, the optimised co-location option 3 before the WLO will inform the design principles and assumed quanta of development of schemes that come forward for development in short to medium term. Consequently, the urban design framework set out in Section 6 is based on Optimised co-location option 3. Should it be evident that the WLO will proceed, it is likely that the SPD will be reviewed. Prior to this review occurring, option 6 would form the basis of changed assumptions about potential development capacity on individual sites.</u>
	Transport for London (TfL) Planning Team	Draft SPD	Delivery of the WLO in the longer term will in part be dependent on securing funding from development, and for this document to explicitly exclude it seems contradictory.	The draft SPD is supportive of the WLO coming forward. Section 6.4 Development amount and principle DP7 movement and accessibility expect future development to contribute towards the WLO. All masterplan growth capacity scenario options safeguard land and access for the WLO.	No change
	Transport for London (TfL) Planning Team	Draft SPD, Chapter 5	Make clear in option 3 and throughout the document to safeguards WLO as a bare minimum.	The WLO is shown on all options for safeguarding purposes and this will further be made clear on the capacity study option maps in section 5 .	Figure 18, 19, 20, 21, 22, 23 legend and map revised to show safeguarded WLO station
	Transport for London (TfL) Planning Team	Draft SPD	Reference to potential need for new or upgraded transport infrastructure should be proposed in the doc. which will also support WLO project.	A separate transport assessment has been commissioned, 'Transport Study Project Brief' (July 2021), which will assess the traffic impact of the NSGA on the local highway and Strategic Road Network and determine if /what interventions and mitigation measures may be required. Additionally, an NSGA infrastructure delivery plan is being prepared that identifies the site-specific and strategic transport infrastructure, including roads, crossing, junctions and public realm improvements, strategic and local links enhancements and interventions (<i>including upgrades to Neasden LU Station and local bus network</i>), and implementation/delivery plan across NSGA. This also includes the WLO project.	No change
	Transport for London (TfL) Planning Team	Chapter 5	Strong preference for scenario including the WLO scenario to deliver good growth.	See response to comments on paragraph r 5.2.10 above. .	No change

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	Transport for London (TfL) Planning Team	Chapter 4	TfL site of interest which has marked as 'existing green space', definition of what is meant by 'green space'.	Fig 12 pg40 refers to TfL site of interest as the existing green buffer to rail corridor not green space as noted.	No change
	Transport for London (TfL) Planning Team	Figure 24 and 26	Section 6- make clear on fig 24 and 26 WLO station included for safeguarding purpose.	Figure 24 revised to say safeguarded WLO station. Figure 26 will removed to avoid confusion.	Figure 24 revised to show safeguarded WLO station, figure 26 deleted to avoid confusion.
	Transport for London (TfL) Planning Team	6.4.24	6.4.24- showcase explicit policy for developer contribution to WLO	6.4.24 states given the projected increase in public transport usage due to population increase and footfall in N S G A, it is essential that development proposals contribute towards the proposed W L O line.	No change
Page 163	Transport for London (TfL) Planning Team	DP1-DP7	DP1 and DP7 - the development principles should ensure inclusivity within NSGA.DP7- Include plan showing what walking/ cycling improvements were expected in the area, particularly if the intention would be to seek contributions towards them from development. DP1- Show plan showing for local transport interventions (e.g. walking and cycling) DP7- Reference to meeting the cycle parking standards set out in the London Plan is made DP7 - we welcome the requirement for all new development to be 'car-free' or 'car-lite', confirm what it means.	The NSGA vision map figure 2 (pg22) identifies the walking/ cycling and other improvement opportunities for NSGA and shows local transport interventions in the area. Additionally, an NSGA infrastructure delivery plan is being prepared that identifies the site-specific and strategic transport infrastructure, including roads, crossing, junctions and public realm improvements, strategic and local links enhancements and interventions (<i>including upgrades to Neasden LU Station and local bus network</i>), including implementation/delivery plan across NSGA. DP1-DP7 will mention inclusivity, and explicit reference to cycle parking standards will be made on DP7 recommendations . Welcome support for car-free or car-lite development for all new development. DP7 references local plan policies for car-free development, and future developments are expected to adhere to policies and principles regarding the same.	Reference inclusivity within principles DP1-DP7 recommendation. - <u>Developments must ensure inclusivity and plan for all user groups.</u> Reference cycle parking standards within DP7 recommendation. - <u>As a minimum, developments will need to comply with Brent Local Plan parking standards, as set out in Policy BT2. Cycle standard- 1 space per studio and 1 bedroom unit; 2 spaces per all other dwellings and visitor cycle parking: 1 space per 40 units and cycle storage.</u>
	Transport for London (TfL) Planning Team	Section 7.4	7.4 - Long term maintenance should include durable materials to ensure quality and life.	Chapter 2 Neasden reimagine, 2.3 our values - A robust place makes specific reference to the use of durable materials for improving cost-effectiveness and help sustain the life and quality of the development. All future developments should be underpinned by the values of creating a robust place.	No change
	27. National Highways (formerly Highways England)	General	National Highways (formerly Highways England) has undertaken a review of the draft SPD which helps identify and maximise the development potential of the NSGA. The SPD proposes a high level of development, and it should be ensured that the transport evidence base for the NSGA, following this consultation, provides indication of what traffic impacts the development site would have on the SRN and M1 Junction 1. As the NSGA development proposal comes forward, it will need to be consistent with the Local Plan and consider traffic impact in accordance with the SOCG agreement and Transport Strategy brief, which National Highways has already reviewed.	As mentioned in the comments, an 'NSGA Transport Study Project Brief' (July 2021) has been prepared and commissioned to assess the impact of development on future transport infrastructure. We note National Highways (formerly Highways England) has previously provided acceptance of the high-level approach presented and has been engaged at all key steps in the identification/development of this transport evidence and modelling. A scoping report together with the final results of the study has been shared with National Highways. The study concludes no significant adverse impacts on the Strategic Road Network (SRN) and M1 Junction 1 that would warrant specific mitigation measures over and above those typically associated with essentially retaining existing industrial floor space and predominantly car-free development. After reviewing the study, National Highways	No change

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				9 th March 2022 confirmed that they are content that development within the NSGA will not have significant impact on the SRN and M1 Junction 1.	
	National Highways (formerly Highways England)	Section 7.3	<p>Section 9 of the Masterplan SPD considers the planning process. National Highways (formerly Highways England) will need to be consulted at the pre-application stage, to discuss proposals for development at NSGA, and allow any issues to be identified and resolved before the submission of a formal planning application.</p> <p>Section 7.3 of the Masterplan SPD (Delivery and Monitoring), confirms that the Council will monitor and review the document to ensure that the document remains relevant and in accordance with policies over the Local Plan period through an Annual Monitoring Report (AMR). This approach is welcomed by National Highways.</p>	Section 9.1 Pre-application encourages applicants to seek early engagement with officers from Brent Development Management to discuss proposals for development at NSGA prior to the submission of a planning application at the pre-application stage. This ensures officers from key service areas such as Highways are engaged early on in the application process. We welcome your support on section 7.3 .	No change
28.	Jeffery Ruffels, Kings Street (Land interest McGovern Site)	Chapter 5	<p>Option 3- Better layout. Access and service need consideration. Pedestrian safety concerns. Pedestrian safety concern due to industrial uses. Block massing consistent. Corner need to be marked to show prominence. Can accommodate more density. Parking if under blocks will impede use parks and amenity spaces.</p> <p>Option 6- Successful option. Can deliver more density. Podium can accommodate more activities and pedestrian realm and green space. Ideal for intensification. Minimum density should be 1000 to be viable. Consideration for parking requirement. Providing new station access on McGovern site save cost for WLO. Direct visual and safe pedestrian access. Safeguard space for WLO. Existing station not able to accommodate growth. Without increased capacity transport infrastructure and other infrastructure needs cannot be met to support proposals. Option 6 is the only reliable viable option that can be made LSIS compliant.</p>	<p>The three scenarios tested before and after the WLO are high-level growth capacity masterplan options to establish the quanta that can be achieved for each scenario. The design options illustrate how redevelopment in the NSGA can viably deliver sustainable growth, meet planning policy requirements, an appropriate mix of land uses (including meeting housing and industrial targets), and necessary supporting infrastructure to transform the existing poor quality environment and bring forward physical, social and economic regeneration for all the community.</p> <p>Our preferred growth capacity masterplan optimised co-location Option 3 is on podium floor level with industrial below and some commercial and residential stacked on vertical floors. This is deemed appropriate as it segregates industrial traffic from more vulnerable road users. These growth capacity options are set out as a framework for development and do not prescribe the detailed design for the sites. Individual schemes will be evaluated on their own merits and how they contribute to the comprehensive development of the area.</p> <p>Both Option 3 and 6 present the best outcomes for NSGA. At this stage, the Council remains supportive of the proposed WLO, notwithstanding the delivery is not guaranteed, and the Council must plan for circumstances in which development in the area outpaces its delivery. Hence our preferred option 3. However, the draft SPD offers flexibility in changes in future circumstances. The draft SPD recognises the opportunity offered by the WLO, and all the options safeguard the WLO Station. 6.4 Development Amount expect developer contribution to the existing station enhancements and Principle DP7 movement and accessibility recognise the contribution to future provision for the WLO. Figure 2 Vision map identifies the transport infrastructure delivery, and Chapter</p>	No change

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				<p>4 Today's NSGA identifies the future infrastructure requirements for the area. Additionally, an Infrastructure Delivery Plan is being prepared for NSGA that further identifies strategic and site-specific infrastructure needs and measures for the comprehensive development of the area.</p> <p>The draft SPD promotes a car-free or car-lite development. Proposals will need to adhere to policy guidance set out in section 6- DP7 Movement and accessibility. As a minimum, developments will need to comply with Brent Local Plan parking standards, as set out in Policy BT2. The draft SPD complies with the Local Plan policies, and any proposal coming forward will need to adhere to the policies and urban design framework set out in the document.</p>	
Page 165	Jeffrey Ruffle, Kings Street (Land interest McGovern Site)	NSGA Viability assessment (BNPP)	The Financial Viability Assessment prepared by BNP Paribas benchmarks the McGovern's land value (with 20% premium) at £6,405,450. The site area is approximately 4.5 acres. This valuation appears to be based on the (indexed) rateable value of the site with a 6% yield multiplier. However, the commercial of industrial land in the area is in the region of £8-10 per acre. Therefore, the basis of the viability must be questioned. Site is worth more as industrial land than it is for development. Both Option 3 and Option 6 assume significant less density that is required to make the development of this viable. Without the development of this site, it is unlikely that the delivery of the whole masterplan is realistically possible.	The BNPP viability assessment benchmarks redevelopment of the draft SPD sites against their existing use value, based on the capital value of existing properties, together with a 20% premium to incentivise release of the sites for development. Such an approach is considered to be in line with national, regional and local planning policy and guidance, and the BNPP assessment is that Masterplan options are viable for the bulk of the sites.	No change
29.	Pinnacle investment	Draft SPD	Support overriding vision for growth and principles set out within the SPD. The SPD should clarify that the delivery of high-density development within this identified Growth Area is not linked or dependent on the delivery of this infrastructure project. (Such as the WLO) as it already benefits from excellent transport links. Support the need for infrastructure identified in the SPD and interested in engaging with residents to establish infrastructure priorities. Supportive of the principles set out within the SPD.	We welcome your support on the principles and vision set out in the draft SPD. Our preferred option is optimised co-location option 3 before the WLO. Whilst we are fully supportive of the WLO coming forward, the draft SPD has taken into account the fact that development may outpace delivery of the WLO. We are supportive of the approach to engage with the residents to assess community needs and infrastructure to inform design/planning for the site.	No change
	Pinnacle investment	6.3 Development Amount	The SPD should clarify and explain that the indicative figures stated for each site are not intended to guide or limit the development amount and opportunity. The guidance should not be overly prescriptive and refer to "two 0.2ha pocket parks". This requirement has not been informed by a detailed feasibility study and there are other relevant planning policies regarding the appropriate quantum of open space and communal space.	The masterplan growth capacity options test the quanta of development for different scenarios and conclude optimised co-location option 3 as our preferred option. As the delivery of the WLO is not guaranteed, and the Council must plan for development outpacing its delivery. The draft SPD offers flexibility in changes to future circumstances. Consequently, 6.3 Development Amount tables show indicative figures. The outcomes of the growth capacity masterplan options are consolidated into a robust urban design network in Chapter 6, and chapter 6.2 Character Area, 6.3 Development amount, 6.4 Development principles, and 6.5 Environmental and sustainability principles provide clarity and certainty on requirements and principles that will guide comprehensive development	No change

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				of the area. This approach is deemed appropriate as the Council needs to plan and meet future infrastructure needs. Whilst sufficient flexibility is offered within the SPD, development proposals are expected to adhere to the principles and guidance set out within the document.	
	Pinnacle investment	6.3 Development Amount	Reference to a district heating network being delivered specifically on this site should be removed, and informed by a feasibility study to determine an energy solution. Remove reference to the exact size of community function and flexibility built to determine type and size through engagement with residents and approach agreed during the pre-application stage.	In terms of the provisions for a district heating network, the Council is proactive and prioritises sustainability and its vision for 'carbon zero' developments moving forward, especially with the declaration of a Climate Emergency. The Council has previously sought engagement with relevant bodies and deems Site 3 (CNWL site) ideal for the location of a district heating network. Furthermore, a feasibility study will be undertaken by the Council in the forthcoming months to provide further direction. We also support feasibility studies being carried out as part of any detailed scheme coming forward on this site.	No change
	Pinnacle investment	6.3 Development Amount	Remove reference to the need to deliver health infrastructure removed unless there is a clear known need.	The Council has worked closely with the NHS and the Healthy Urban Development Unit (HUDU) and has identified future provisions needed to meet health infrastructure generated by the new developments, which should be accommodated on site. We support further engagement with residents and relevant stakeholders to access this need.	No change
Page 166	Pinnacle investment	9.6 CIL/S106 planning obligation	The SPD should directly refer to Regulations 73 of the CIL regulations to confirm the acceptability of delivering infrastructure 'in kind' of CIL contributions such as contribution towards the existing station. Site 3 is closer to Dollis Hill station. Further detail and assurances are required regarding any requested contributions. Expect it to be part of the CIL contribution. Significant infrastructure improvements would likely fall outside of any planning application for the CNWL site, need to be better developed before referencing within the SPD.	In terms of CIL and specific infrastructure requirements identified in the SPD, such as green space, the SPD seeks to provide clarity and certainty on key requirements and outcomes in section 6.3 Development amount and takes into account the existing and future demands in the area. This approach is deemed appropriate and in line with the SPD's and Local Plan objectives. Additionally, Section 9.6 CIL/S106 Planning Obligation provides a reference to the Council website: https://www.brent.gov.uk/services-for-residents/planning-and-building-control/planning-policy/community-infrastructure-levy-cil/ , where further details regarding regulation 73 (contributions in-kind) can be found. The acceptability of CIL as such will be determined when detailed schemes come forward for planning. Any existing outdoor sports facilities must be retained or re-provided and consistent with the Local Plan policies.	No change
	Pinnacle investment	6.3 Development Amount, DP5, DP6	Reference to the retention of sports facilities removed as it is associated with existing College uses relocated. The correct type and location of play and sports facilities should be informed through the design process and relevant planning policies.	Any existing outdoor sports facilities are required to be retained or re-provided and is consistent with the Local Plan policies.	No change
	Pinnacle investment	6.2 Character Area	SPD should clarify that the Character Area guidance is not intended to be prescriptive or limiting. The approach to massing, layout and height should be informed through detailed engagement with key stakeholders.	We welcome your support on the character areas and principles set out in the draft SPD. 6.2 Character Area section provides further guidance of this area's acceptable future characteristics, including land use, street width, street type and connectivity, building type, height and massing, and Landscape and open space type.	Height's Plan included section 5.2 Growth capacity study scenario with preferred option 3.

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				Additionally, a heights plan will be included within section 5.2 Growth Capacity Study Scenario- Preferred optimised co-location option 3 to provide guidance on the appropriate location of the taller buildings within NSGA. The SPD seeks to provide clarity and guidance on the acceptable design principles within the Character Area section, which developments should seek to adhere to. Notwithstanding, it is not the only way or a single blueprint of how developments within NSGA can come forward. Individual schemes will be evaluated on their merit and how they bring comprehensive development to the area whilst taking account of the SPD's principles and guidance and other planning objectives when they come forward for planning.	
30.	Maragan Investments limited	Draft SPD	Support for the vision and principles set out in the draft SPD.	We welcome support on the vision and principles set out within the draft SPD.	No change
Page 167	Maragan Investments limited	Section 6.2 Character Area	Limiting the heights of development on the Dephna House site does not allow for the site to be fully optimised (as required by national and local planning policies) whilst also fitting seamlessly into the future context of the Growth Area. Changes sought for Dephna House Character area to accommodate 20 storeys and providing an element of commercial floor space on the ground floor as opposed to industrial.	Proximity to 2 storey residential properties and low-rise developments means that in advance of detailed analysis that would typically be required in association with a planning application, the Council is only confident of supporting the heights identified in SPD. The Depot Mews Character Area is for building heights up to 4 storeys to the west, rising to 7 storeys to the east, to respect the surrounding townscape. It might be that greater height for Dephna House can be shown to be appropriate through the application process.	Section 6.2 Character Area: Depot Mews Character Area table 17 and text 6.2.20 Future Character –Added text <u>Note: Consideration for appropriate heights will be made subject to detailed design and impact assessment when sites come forward for planning.</u>
	Maragan Investments limited	Chapter 5	Provide an element of commercial floor space on the ground floor as opposed to industrial for Dephna House site.	Whilst light industrial uses are desirable for the majority of this character area, for the Dephna House site, due to its optimum location and access to wider movement network, provision for some commercial uses are acceptable at ground floor level.	Section 6.2 Character Area: Depot Mews Character Area table 17: <u>Acceptable research and development, light industrial Class E type of alongside commercial uses.</u>
	DP9- O'Hara site	Chapter 5.2 Growth Capacity Study scenario	Deletion of "Maximums" For the SPD to be effective, it needs to be flexible. The document artificially and unnecessarily refers to maximum development capacities.	The draft SPD conforms to the Local Plan and London Plan objectives and follows a plan-led approach. The masterplan approach tests the growth capacity study scenario options before and after the WLO and seeks to establish the quanta of development appropriate for the sites in each case. The SPD consolidates the outcomes of the masterplan capacity studies into a robust urban design framework and seeks to provide clarity and certainty on key requirements and outcomes in section 6.3 Development amount. Individual schemes will be evaluated on their merits and how they contribute to the comprehensive development of the area. 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. Option 3 (before WLO) is our preferred option. The subsequent capacity tables 8 and 9, and 6.3 development amounts are based on this optimised co-location option 3.	Chapter 5.2 Growth Capacity Study Scenario: Reference to maximum removed on all growth capacity study scenario options (Before and after the WLO).

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				Though the Council remains fully supportive of the proposed WLO, its delivery is not guaranteed, and the Council must plan for circumstances in which development in the area outpaces its delivery. We acknowledge the provision for the WLO will further help unlock the potential for land in the area and consequently higher densities. Consequently, our preferred option is option 3. However, the draft SPD offers sufficient flexibility to the change in circumstances. The reference to maximum quantum of development will be revised in section 5.2, growth capacity study scenarios. Future developments are expected to adhere to the principles and urban design framework set out in the document for the comprehensive development of the area.	
Page 168	DP9- O'Hara site	Section 6.2 Character Area: Neasden Triangle	Neasden Triangle Replace "22" to "Over 20 storeys" for Neasden Triangle. Neasden Triangle has the ability to accommodate a number of tall buildings, the tallest of which could be around 30 storeys.	<p>The Neasden Triangle character area table 13 clearly sets out the acceptable future characteristics for the O'Hara Site. This has been informed by best practice urban design analysis and principles, review of all relevant policies both within the Brent Local Plan and London Plan policies, the Tall Building Strategy, Brent Design Guide SPD1, alongside the values set within chapter 2 Neasden Reimagined, that underpin the growth capacity masterplan option 3. Additionally, a heights plan will be included for further clarity on where this can be accommodated. Please note that the draft SPD section 5.2 clarifies that the growth capacity study scenario options are high level and not in any form a single blueprint or the only way for development to come forward within NSGA.</p> <p>While the draft NSGA Masterplan SPD does not prescribe the location of the tallest building on the site, the design proposals are expected to look at the wider townscape to consider its appropriateness and step down/up likewise. Please note individual sites will be evaluated on their merit and how they bring comprehensive development of the area when they come forward for planning.</p>	Height's Plan included section 5.2 Growth capacity study scenario with preferred option 3.
	DP9- O'Hara site	Draft SPD	Remove reference to "heavy/logistics"	<p>The draft SPD seeks to meet the London Plan and Brent Local Plan policy objectives. Policy E4, E6 and E7 of the London Plan sets out the policies for industrial land. The Brent Local Plan Policy BE2 takes this strategic designation forward and affirms its development potential to support intensification and co-location. Policy BE2 requires industrial floor space resulting in a minimum 0.65 plot ratio or the existing floor space total, whichever is greater, across the growth area. Chapter 6.4 Development principles: DP3 Local employment and affordability provide further clarity on the expected industrial floor space.</p> <p>The O'Hara site is a locally significant industrial land (LSIS). Development proposals are expected to meet the</p>	No change

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				policy set out in the Brent Local Plan and London Plan, which LSIS for industrial use and provide employment opportunities for the local community. Please note individual sites will be evaluated on their merits when they come forward for planning.	
	DP9- O'Hara site	Chapter 5	Increase Site 2 "New Housing Target. Approximately 650 homes.	The draft SPD tests the growth capacity study scenario options before and after the WLO and seeks to establish the quanta of development appropriate for the sites. It consolidates the outcomes into a robust urban design framework and seeks to provide clarity and certainty on key requirements whilst providing sufficient flexibility to change circumstances in the future. Individual schemes will be evaluated on their own merit and how they bring comprehensive development of the area while adhering to the draft SPD principles and urban design framework.	No change
Page 169	DP9- O'Hara site	Chapter 5	Amend Site 2 "Industrial & Commercial – "Approximately 1,100m2"	Our preferred capacity option 3 is on podium floor level with industrial below podium and some commercial and residential stacked on vertical floors. This will ensure the segregation of industrial uses and traffic from other more vulnerable uses. We would thereby deem industrial uses appropriate for the site. Section 6.4 Development Principles- DP3 Local employment and affordability further provide guidance on the kind of industrial spaces which can be accommodated within future developments. Industrial capacities are minimum targets based on indicative capacities. Please note individual proposals will be assessed on their merits and how they bring comprehensive development of the area when they come forward for planning. In terms of the commercial uses, this is indicative, and future proposals must engage with local residents and stakeholders to determine the appropriate kind of uses. Future proposals must adhere to policy DP2: Local Neighbourhood parade and must not unacceptably impact the vitality and viability of the nearby Neasden and Church End town centres in terms of proposed uses and over provisions.	No change
	DP9- O'Hara site	Chapter 6- DP4	Amend Housing mix to be "25% family-seized dwellings subject to individual site constraints".	Proposals will need to adhere to policies within the Brent Local Plan in terms of providing housing mix.	No change
32.	Neasden Good's Yard (Glynn's Skip)	Chapter 6.5	The proposed allocation of the two Neasden waste facilities in the draft SPD for redevelopment to deliver new housing and industrial and commercial floor space, alongside supporting infrastructure (McGovern Yard Site) will have a considerable impact on our operations. It is therefore imperative (as noted in the SPD) that any future development proposals for the McGovern Yard Site appropriately accommodate the existing waste capacity on-site, or alternatively identify suitable sites with appropriate waste capacity.	Comments noted. Section 6.5 Environment and sustainability principles: ESP9: Waste management within the draft SPD clearly states the two Neasden waste sites are protected under London Plan Policy S I9 Safeguarded Waste sites and the West London Waste Plan Policy WLWP2 – 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	

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				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 the compensatory and equal provision of capacity for waste, in scale and quality, is made elsewhere within the West London Boroughs. Application of Agent of Change principle has been referenced in ESP2 Noise and other nuisances within the document. (pg70).	No change
33.	United College Group (College of North West London)	General	UCG has agreed Heads of Terms with Pinnacle Investments who are selected as our preferred developer partner to acquire the Willesden campus with a view to regenerating the site and providing a significant number of market and affordable homes. UCG wish to support their detailed representations on the emerging masterplan in this respect.	Noted.	No change
34.	Transport for London Commercial Development (TfL CD) (Dephna House and Depot Mews)	Draft SPD	Requirement for industrial uses on this site is not supported, which is as per TfL CD's representations submitted to the Local Plan consultations. If uses other than residential are considered necessary then commercial uses would be a more complementary. The site has no current industrial designations.	The provision for industrial uses is desirable on the Dephna House (Depot Mews) site. This reflects in part the existing quasi-industrial use associated with its support of the LUL network at Neasden depot. In addition, it takes into account the overall need for additional industrial floor space in the borough as identified in the Local Plan. Representations received on the draft SPD indicate that the existing LSIS sites may struggle to be policy compliant in terms of the re-provision of required levels of industrial floor space. Consequently, we are seeking some light industrial, research and development and Class E type of alongside commercial uses on site 5.	No change
	Transport for London Commercial Development (TfL CD) (Dephna House and Depot Mews)	Section 6.2 Character Area: Depot Mews, Chapter 7: Delivery-Figure 29	In the BNP Paribas Real Estate Financial Viability Assessment October 2020 the options tested for the Dephna House and Depot Mews site do not appear viable, albeit the options tested combine the London Underground Limited site and the Dephna House site which are owned by two different landowners, and the existing use value of the Dephna House itself is dominating the viability assessment output for both sites.	Using the site for some industrial purposes such as small scale Class Eg. (ii and iii) research and development and light industrial premises on the ground floor gives greater assurance across the masterplan area that provision of industrial floor space will be maximised. It is evident that access to the wider remaining depot uses to the east will still be sought, including HGV traffic. This, together with the lower level of the site compared to existing residential areas to the north, as identified in the SPD, points to a design solution that more clearly distinguishes and provides a clear separation between a non-residential and residential environment. Figure 29: NSGA land ownership and phasing will be revised to show the multiple ownership on the Dephna and Depot Mews sites.	Section 6.2 Character Area: Depot Mews- Table 17 character area: <u>Acceptable research and development, light industrial Class E type of alongside commercial uses.</u> Section 7. Delivery- Figure 29: Amend to show TfL (CD) ownership on Site 5 and revise legend to show private ownership.
	Transport for London Commercial Development (TfL CD) (Dephna House and Depot Mews)	Section 6.2: Depot Mews:6.2.20	Request that the LUL part of the site is not required to provide industrial uses and there should not be an inflexible requirement for a podium level. If a podium element is required as mentioned in 6.2.20 of the draft SPD (which it is assumed would help facilitate the separation of industrial and residential uses so they could coexist) then there will need to	The podium floor for the Depot Mews Character Area is a design solution to separate ground floor industrial uses from residential uppers and could help attain Local Plan private amenity space standards being met on site. It is a recommendation, not a requirement.	No change

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			be a significant increase in the amount of residential to pay for this.		
35.	NEMA Ltd (McGovern Site)	Draft SPD	Support preparation of the draft document.	Welcome support of the development of draft SPD.	No change
	NEMA Ltd (McGovern Site)	Draft SPD	Constraints and capacity issues with existing station and new WLO station requirement on Site 1. It should acknowledge the burden to Site 1 in facilitating both Neasden Station and the WLO's delivery. It should ensure the land uses, design and quantum of development set out in the Urban Design Framework accord with these aspirations and provide flexibility to enable this.	Whilst we understand the constraints to the existing station and the future requirement for the WLO Station, the Council must plan for development outpacing WLO's delivery as it is not guaranteed. Section 6.3 development amount seeks contribution for the enhancement of the existing station and other infrastructure requirements. A separate Transport Study has been prepared to assess the impact of NSGA development on future transport infrastructure. The draft SPD demonstrates the range of dimensions within which regeneration can appropriately come forward in the most suitable way. It consolidates the outcomes of the masterplan capacity studies into a robust urban design framework including development, sustainability and environmental principles that are underpinned by best practice urban design analysis and the vision and values set out in chapter 2 and Section 6.3 Development Amount provides clarity and certainty on key requirements and outcomes whilst proving flexibility to future change in circumstances.	No change
	NEMA Ltd (McGovern Site)	Draft SPD	In terms of land uses, we highlight the importance of delivering the right mix of land uses for Site 1. The existing site is heavily constrained and not a realistic prospect for redevelopment which incorporates heavy industrial uses and impact on local and wider road safety. The approach to lead with no net loss of industrial floor space does not reflect the realities of the delivery of a mixed-use sustainable development which would also be burdened to provide the catalyst for the wider area to come forward (i.e. new Neasden station entrance and WLO station). The delivery of the correct balance of uses must be considered. Light industrial can include quasi retail and maker type uses that could contribute towards placemaking and meet Brent's objectives for job creation with flexible commercial uses on Site 1.	The draft SPD conforms to both London Plan and Brent Local Plan objectives that support the intensification of industrial uses within Locally Significant Industrial Sites (LSIS) and co-location of residential uses to make better use of land and to strengthen their role in supporting growth in London's economy and population. The Brent Industrial Land Audit (2019) and policy BE2 in the Brent Local Plan support such an approach. Site 1 has the potential to support both commercial and industrial uses alongside co-locating with other non-industrial uses.	No change
	NEMA Ltd (McGovern Site)	Draft SPD	Concerns due to the separate land ownerships and development timeline, district heating network may make site beholden on its delivery, recommend a passive provision approach in order to not limit sustainable development from being delivered. Advising only in regard to Site 1, these include an extensive network of Thames Water assets in the form of water mains and sewers, significant level changes to deal with, areas at high risk of surface water flooding and the need to achieve a robust fire-fighting strategy for the development. The draft SPD needs to provide appropriate flexibility to ensure that the circumstances of individual sites can be taken into account, and to ensure that development is viable, particularly those with upfront exceptional costs such	The Council is proactive, prioritises sustainability, and has a 'carbon zero' vision, especially with the declaration of Climate Emergency. The Council will undertake a feasibility study for the district heating network in the forthcoming months. We acknowledge that developments within NSGA will come forward at varying timescales. Development proposals are not contingent on their delivery and will need to have an S106 agreement and infrastructure put in place to accommodate sustainable energy requirements. Chapter 4 Today's Neasden Stations Growth Area and section 4.9 constraints identify the site constraints on NSGA. Whilst we understand the significant site constraints to Site 1, the growth capacity masterplan	No change

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			as the delivery of a new station and the related donation of the land. We recommend specific reference to floor space quantum and the inclusion of site-specific indicative housing capacity figures are not included as part of the adopted SPD.	options are high level and do not prescribe the design for the sites, offering flexibility in terms of mitigating site constraints through design whilst adhering to the urban design principles set within Chapter 6 that further guide the comprehensive development of the area.	
	NEMA Ltd (McGovern Site)	Chapter 5	The Neasden NEMA Limited are concerned that if indicative capacities are set within the SPD that development proposals would be unduly restricted and limit the ability to deliver public benefits. We would support an approach where under the designation of being an area suitable for tall buildings, the onus is on the design and placemaking to demonstrate the suitability for the height of development where such a range is exceeded, having in mind the functional, environmental, visual and cumulative impact in line with London Plan policy D9. We would value further input into how building heights will be presented as part of the adopted SPD and would support an approach that looks at key principles and sets heights in broader terms rather than setting specific height ranges for Site 1. Otherwise there is a risk key considerations such as infrastructure delivery and the background evolving rather than existing viability context would not be factored in.	<p>The masterplan growth capacity options test the quanta of development for different scenarios and conclude optimised co-location option 3 as our preferred option. As the delivery of the WLO is not guaranteed, and the Council must plan for development outpacing its delivery. The draft SPD offers flexibility in changes to future circumstances. Consequently, 6.3 Development Amount tables show indicative figures. The outcomes of the growth capacity masterplan options are consolidated into a robust urban design framework. Industrial capacities are minimum targets based on indicative capacities. Chapter 6- Urban Design Framework, and chapter 6.2 Character Area, 6.3 Development amount, 6.4 Development principles, and 6.5 Environmental and sustainability principles provide clarity and certainty on requirements and principles that will guide comprehensive development of the area. This approach is deemed appropriate as the Council needs to plan and meet future infrastructure needs. Whilst sufficient flexibility is offered within the SPD, development proposals are expected to adhere to the principles and guidance set out within the document.</p> <p>The draft SPD has been informed by robust baseline analysis and best practice urban design principles. Additionally, a heights plan will be included to provide further guidance on the appropriate location for Tall building elements within section 5.2 growth capacity study scenarios preferred option 3. Notwithstanding, this is not the only way or a single blueprint for developments to come forward. There are no impacts to protected views in the growth area. A viewing corridor to Wembley Stadium has been shown as desirable in section 4.8 Topography and Views to maximise visual aspect to Wembley Stadium with Taller building elements. Please note individual schemes will be evaluated on their merit to bring comprehensive development to the area when they come forward for planning.</p> <p>The Council is satisfied the viability of the NSGA Masterplan SPD has been robustly tested in line with national, regional and local policy, and BNPP assessment is that Masterplan options are viable for the bulk of the sites. A separate infrastructure delivery plan is being prepared that identifies the delivery and implementation of infrastructure across the NSGA. This includes transport, community and green infrastructure for the next five-plus years.</p>	Section 5.2 masterplan capacity scenario, preferred optimised co-location option 3. (pg.53): Include Heights plan.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	NEMA Ltd (McGovern Site)	BNPP Viability Assessment	<p>Advice from DS2, a viability consultancy to provide a 'Viability Response' to the Financial Viability Assessment (FVA) prepared by BNP Paribas Real Estate to support the draft NSGA Masterplan SPD indicates insufficient account has been taken of constraints, which together with other assumptions in FVA provides an optimism bias to achieving on-site viability which cannot be supported by the masterplan options development outcomes.</p> <p>DS2 summary: This viability testing exercise demonstrates that the scale of development at the Site currently envisaged within the draft SPD is insufficient to viably deliver a level of affordable housing in keeping with the wider aspirations for the NSGA. Through sensitivity and scenario testing we conclude that the scale of residential development would need to be increased significantly in order to deliver a greater level of public benefit, of at least 1,000 homes, potentially greater subject to the level of affordable housing provided. These conclusions are based on future growth/ inflation in values and costs. On a current day basis, the Site is considerably unviable.</p>	The Council is satisfied the viability of the NSGA Masterplan SPD has been robustly tested in line with national, regional and local policy, and BNPP assessment is that Masterplan options are viable for the bulk of the sites. A separate response from BNPP regarding DS2 comment on the BNPP Financial Viability Assessment can be found at the end of this report.	No change
Page 173	Deloitte LLP- Universities Superannuation Scheme asset owner- Falcon industrial estate	Draft SPD, Chapter 5,6 and 7	The draft SPD is being prepared in response to policy BEGA1 of the new Local Plan which states that the Growth Area is subject to a masterplan process. We would normally expect this process to follow adoption of the Local Plan in order to ensure that it properly addresses the adopted policy requirements. USS is concerned that this is premature and as the draft SPD hinges on the site allocation, it could prejudice the direction of the SPD if the emerging Local Plan is found unsound by the Planning Inspector during the current examination or if there are changes to the draft allocation policy BEGA1. USS will support a masterplan that allows flexibility depending on market conditions and demand. The proposed masterplan and draft SPD should be appropriately flexible to allow further detail to come forward at a later stage. It should set the principle for re-development and the potential number of units it could accommodate should development take place, however it should also explicitly state that this is an indicative figure subject to further feasibility work. Requests clarification is added to the requirements section to state that the requirements are aspirational and will be subject to further detailed design and delivery plan should the Site come forward for redevelopment in the future.	The draft SPD is consistent with the Brent Local Plan and the London Plan objectives. There is no limitation for a draft SPD only to be consulted upon after adopting a Local Plan. It is relatively common practice as it provides greater clarity on the deliverability of sites and understanding policy requirements. London Plan policy E7 intensification, consolidation and co-location of LSIS requires a coordinated master planning process rather than ad-hoc planning applications. As such, it is in the interest of landowners and developers for the SPD to be brought forward in a timely manner. It is considered that the development sites will essentially be for the site owners or developers to bring forward and that this will also be reliant upon issues such as lease lengths and viability of development vs retaining uses as they are and economic cycles. The draft SPD follows a plan-led approach and conforms to both London Plan and Brent Local Plan objectives. The draft SPD concludes the masterplan capacity optimised co-location option 3 as our preferred option and consolidates this in a robust urban design framework and provides sufficient clarity and certainty on requirements, alongside the flexibility to accommodate future changes in circumstances within NSGA. Please note individual schemes will be evaluated on their own merit and how they bring the comprehensive development of the area when they come forward for planning. Future proposals are expected to adhere to the principles and urban design framework set within the draft SPD doc.	No change

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	Deloitte LLP- Universities Superannuation Scheme asset owner- Falcon industrial estate		Support vision for industrial space and tall buildings but note added that existing industrial uses will be retained in the medium term given their current good condition and functionality.	We welcome support for the vision for industrial space and tall buildings. Section 7, figure 29 landownership and phasing clearly identifies Falcon industrial site as a long term aspiration and recommends retaining the existing industrial facilities. Section 4 Today's Neasden recognises the current good condition and functionality of the site.	No change
	Deloitte LLP- Universities Superannuation Scheme asset owner- Falcon industrial estate	Section 6, DP3,DP7,	Council needs to explicitly states that only a comprehensive redevelopment would be required to meet these standards set in section 6 development principles (DP3, DP7). If USS for example requires the change of use of a number of units, they should not be subject to these requirements.	The Council will continue to seek to engage and work with landowners who are a key part in ensuring that delivery outcomes can be achieved. It is recognised that Falcon Park provides relatively modern premises that are fit for purpose in meeting current occupier's needs. The policy indicates that housing delivery will occur over time; thus, it is understood that, in all likelihood, premises and sites will be used for other purposes before then. The Council is providing a positive framework for the area taking into account all policy, development, place making, transport and sustainable parameters.	No change
	Deloitte LLP- Universities Superannuation Scheme asset owner- Falcon industrial estate	Section 7.5	USS does not consider it necessary to include Section 7.5 in the SPD for this part of the Growth Area and recommends this is replaced with a commitment to work collaboratively with landowners.	The Council's intervention via CPO will only occur where absolutely necessary, and all other mechanisms of the potential agreement have otherwise been exhausted. It is considered that the current policy framework provides a sufficiently flexible approach to the future site development either for mixed-use industrial or residential purposes in the longer term and continued flexible use for industrial occupation in short to medium term.	No change

4.2 Summary of other changes to the Draft NSGA MASTERPLAN SPD

DRAFT SPD CHAPTER/SECTION/PARA	CHANGES AND REVISIONS
Front cover	Revised Masterplan SPD date to April 2022
Pg.2	Reference to growth area changed to capital letter G and A
Pg.2 reference to emerging Brent Local Plan	Reference to Brent Local Plan changed emerging to Brent's Local Plan
Pg.3 Contents	Revised to remove reference to draft
Pg.4 Masterplan SPD consultation	Revised to include consultation process and methodology up until now (as the process is now complete). Language changed to past tense and information added regarding consultation summary report. Dates for the consultation period added to included 6 weeks from 21 June 2021 to 2 August 2021. With additional week extension based on feedback from residents and stakeholders. Remove reference to being
Pg.5 Stakeholder Engagement	Revised to reflect the completion of the consultation process. Also, includes additional information regarding where to find the consultation report and final SPD doc.
Pg.6 Executive summary	Executive summary text amended to include: Original text: We are in the midst of a climate and ecological emergency, and a global pandemic. New text: <u>We face a climate and ecological emergency, and the challenge to achieve carbon neutrality by 2030.</u> New text: <u>The aim is to maximise the best use of land, provide homes and employment opportunities through industrial intensification and residential co-location supporting the Mayor's and Council's vision, and facilitate 'good growth' for Brent.</u>
Pg.7	Label added to image (page divider) <u>NSGA sites-</u>
Pg.9	Map and key amended to add Wembley Growth Area
Pg.10	1.1 background, para 1.1.3 and Para 1.3.2 amended to add abbreviation for GLA, WLA, TfL, and summary formatted
Pg.11	Label added to image (page divider)- <u>View towards Wembley Stadium from the bridge on Neasden Lane adjacent NSGA</u>
Pg.11.1	Abbreviation added for NSGA and WLO
Pg.12.1	<u>Original Text:</u> Promote active and sustainable travel modes and encourage the development of new infrastructure and the extension or enhancement of existing infrastructure; <u>New Text change on Masterplan SPD aims:</u> <u>Promote active and sustainable travel modes and encourage the links to proposed infrastructure and the extension or enhancement of existing infrastructure;</u>
Pg.14	Reference to growth area changed to capital letter G and A
Pg.21	Vision map legend update for Potential to connect to wider regeneration area Growth Areas. Vision map legend update for Maximise long distant distance views of Wembley Stadium. Incorrect street name Prout Grove corrected to Normanby Road and label Figure 2 amended to say Opportunities for comprehensive regeneration of the area
Pg.22	2.4.4 Abbreviation for NSGA uses; growth area amended with capital letter Growth Area,
Pg.22	2.4.7. <u>Delivery of the WLO line alongside the existing Neasden Station will improve public transport accessibility 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.</u>
Pg.23	Map updated to correct location of NSGA Site Allocation, and correct text West Hamstead Hampstead
Pg.24	Map updated to make it clearer and label updated to read- <u>Figure 4: Illustrative movement sketch of the strategic location of Neasden Stations Growth Area</u>
Pg.25	Label added to image (page divider)- <u>Existing Neasden Underground Station</u>
Pg.27.	Figure 5 NSGA policy framework edited to show National Planning Policy Framework (NPPF) in place of National policies
Pg.28	3.1.4 corrected to 3.1.3 and changed duplication, 3.1.6 refer to as Brent Local Plan Policy BE2: LSIS and intensification through co-location, Industrial land designation label made big, 3.1.10 abbreviations added to LSIS and SIL , 3.1.14 abbreviations added for WLO
Pg.29	Label added to page divider: <u>View of Neasden Lane between McGovern site (Glynn's scrapyard) and O'Hara site</u>
Pg 32.	4.1.1 abbreviation for NSGA and LSIS added, picture label amended to say Two storey terraced properties along Denzil Road
Pg.34	Figure 9 key amended with NSGA abbreviation and label amended to say NSGA sites red line boundary
Pg.34	4.2.1 Site 3a description amended to say 50 terraced housing dwellings
Pg.37	PTAL map amended as sent by TfL
Pg.39	4.6.5 Original text: Development at NSGA New text: Development of the protected waste sites in NSGA
Pg.41	Map and Legend amended to show and note only the Protected view to Wembley Stadium (not impacted by developments on NSGA)
Pg.41	4.8.2 New text: <u>There are no impacts on the protected view towards Wembley Stadium over the bridge on Neasden Lane due to developments on NSGA.</u>

DRAFT SPD CHAPTER/SECTION/PARA	CHANGES AND REVISIONS
Pg.44	Label added to page divider image- <u>Illustrative 3D visualisation sketch showing tomorrow's NSGA</u>
Pg.46	5.1.1 and 5.1.2 amended to make G and A capital while referencing Growth Area 5.2.1 amended to add scenario 1, scenario 2 and scenario 3 text in front of the three scenarios tested
Pg.47, Pg.48,Pg.49,Pg.50,Pg.51, and Pg.53	5.2.4, 5.2.5, 5.2.6,5.2.8,5.2.9 and 5.2.10 amended to add new text: <u>Site 6 is deemed unlikely to come forward for wholesale redevelopment based on the viability assessment, but may come forward on an individual and smaller site basis for mid-rise intensification.</u>
Pg.56	Label added to image (page divider)- <u>Illustrative 3D visualisation sketch of proposed NSGA masterplan</u>
Pg.58	6.1.1 amended to make G and A capital while referencing Growth Area
Pg 58	6.1.2 text amended to fixed minimum to ensure policy compliance.
Pg.59- 62	Tables 13,14,15,16,17 title amended to say Character Area <u>design parameters</u> and Landuse as Land use
Pg.62 and Pg.63	Titles amended to read Neasden Works and Depot Mews and Neasden Works and Depot Mews
	6.2.20 6.2.20. <u>Based on the topography of the site and the interface with Neasden Depot, a podium can be proposed across its extents with residential blocks above. However this is subject to detail assessment of the site. Due to the proximity of existing residential properties to the north of the site, it is considered that Depot Mews can support building heights up to four storeys to the west, rising to seven storeys in the east.</u>
Pg.65 to 67	6.3 development amount added (minimum) to all industrial floorspace targets
Pg.69	DP5 Recommendations: Old text: Sports England New text: Sport England
Pg.77	Label added to image (page divider)- <u>Illustrative 3D visualisation sketch of the proposed NSGA masterplan</u>
Pg.89	New text: <u>9.5.1. Design Review is an independent and impartial evaluation process in which a panel of multi-disciplinary experts on the built environment assess the design of a proposal. The process is in place to improve the quality of buildings and places and is widely recognised as having a positive impact. The importance of Design Review is specifically referenced in both the National Planning Policy Framework (NPPF) and the London Plan. 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. Further information is available at the Brent Council website - link to https://www.brent.gov.uk/services-for-residents/planning-and-building-control/design-and-placemaking/design-review/</u>
	9.7 contact and further guidance added new email: Email: planningstrategy@brent.gov.uk

NEASDEN STATIONS GROWTH AREA

MASTERPLAN SUPPLEMENTARY PLANNING DOCUMENT APRIL 2022

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 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.

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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

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 NSGA 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 purpose of the consultation process was to provide developers, landowners, local businesses and residents, as well as relevant internal and external stakeholders and partners, an opportunity to participate and feedback on the Masterplan SPD. A draft Masterplan SPD was published for consultation to allow the wider public and interest groups to review and comment upon its content.

The Council raised awareness through The Brent Magazine, website, social media and other publicity materials. The consultation was online and offline, with materials disseminated across a variety of platforms and in a variety of formats. Hard copies of the documents were available for review and comment at Council buildings, such as Brent Civic Centre and Willesden Library. The draft Masterplan SPD and the comment form and relevant information were published on the Council's dedicated web page and consultation portal.

The Masterplan SPD was subject to six weeks of formal consultation between 21 June 2021 to 2 August 2021 following Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012, which was held in line with the Council's Statement of Community Involvement. The consultation was extended another week (until 9 August 2021) following requests and feedback from local residents and stakeholders. An Adoption Statement and Consultation Statement setting out the comments received and Council's responses also accompanies this Masterplan SPD, which are 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 planning policies and planning applications.

This Masterplan SPD has been developed through ongoing consultation with several key stakeholders, though the Covid-19 pandemic has limited wider public participation. Masterplan capacity testing commenced in early 2020 and coincided with government restrictions, making it challenging to engage the local community in the master planning process at that stage. The Council engaged the local community for six weeks as part of the statutory consultation process. A one-week extension was also accommodated following requests and feedback.

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 Greater London Authority (GLA), Transport for London (TfL), West London Alliance (WLA), 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 placed notices on its website (www.brent.gov.uk), to inform residents what documents were available for comments and how feedback could be provided. The adverts provided details around:

- What the Neasden Stations Growth Area Masterplan SPD was;
- 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 considered all written comments (electronic and hard copies) and representations made during public consultation process and presented it in a consultation summary report. The consultation report also includes officer's response and revisions made to the draft SPD. This document will be available to view on the Council's website.

EXECUTIVE SUMMARY

We face a climate and ecological emergency, and the challenge to achieve carbon neutrality by 2030. 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 Brent local Plan. The aim is to maximise the best use of land, provide homes and employment opportunities through industrial intensification and residential co-location supporting the Mayor's and Council's vision, and facilitate 'good growth' for Brent.


This Masterplan SPD seeks to unlock the massive potential that the Neasden Stations Growth Area (NSGA) has to offer, and define a new place that balances local choices and opportunities 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, permeable movement network, and climate resilient, will create an inclusive and sustainable neighbourhood that can support at least 2,000 new homes, and also serve as a distinctive gateway to Neasden.

The 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. It details the planning policy context and conforms to both the Brent local Plan and the London Plan. By adopting a masterplanning approach, 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.



 Dollis Hill Station

1. INTRODUCTION

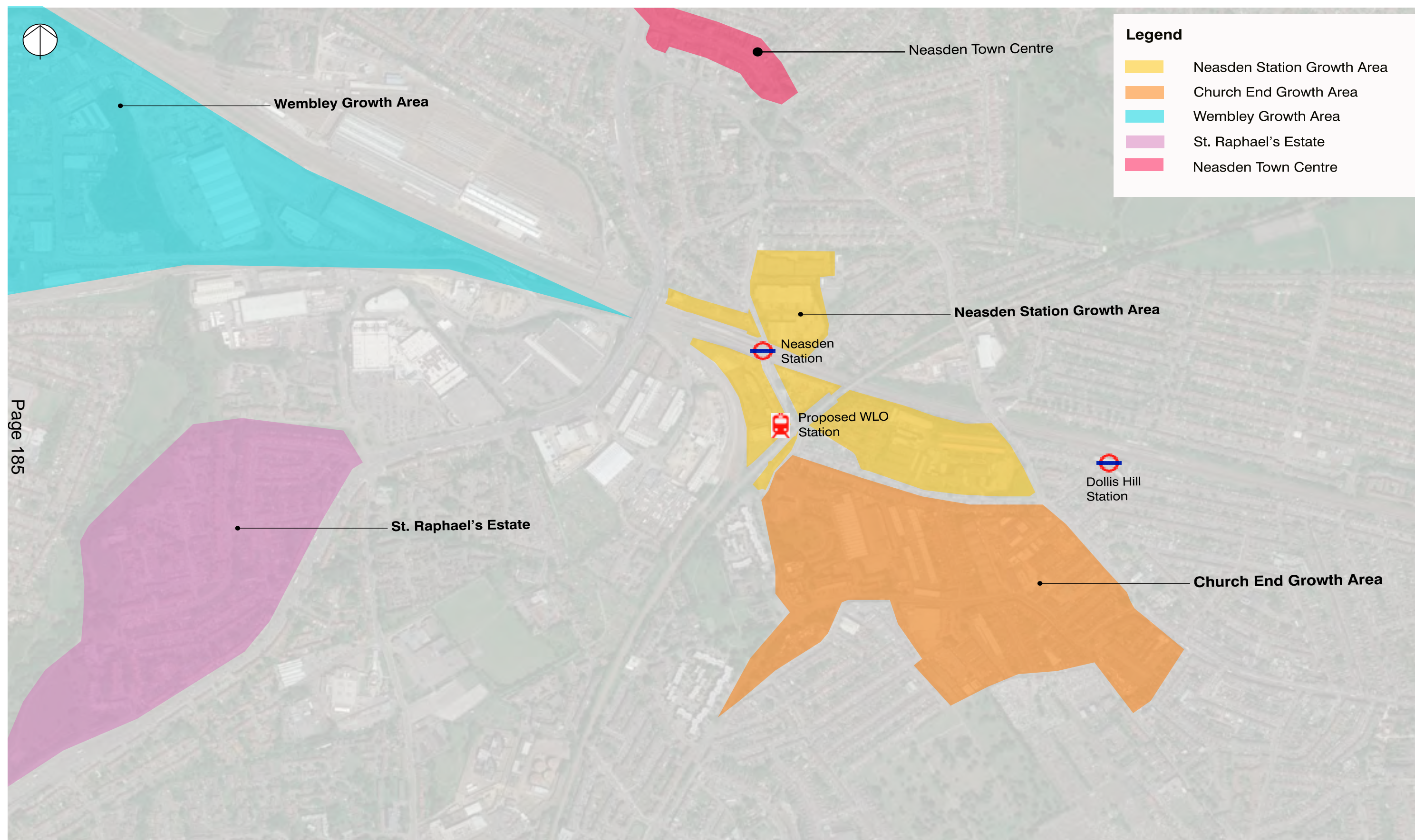


Figure 1: Wider regeneration context

1.1 BACKGROUND

1.1.1. Brent Council, in collaboration with the GLA, has prepared a SPD for the 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 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 Brent Local Plan identifies the potential for NSGA to accommodate a new station as part of the proposed WLO line, supporting the delivery of new homes and jobs to meet the Brent and wider London needs 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 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 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 evolved through an iterative process involving key stakeholders such as the GLA, the Environment Agency, Natural England, TfL, WLA, landowners, developers, Officers and Members of the Council, infrastructure providers and local people and community groups as mentioned in the previous section. 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.



View towards Wembley Stadium from the bridge on Neasden Lane adjacent NSGA

2. NEASDEN REIMAGINED

2.1 OUR VISION

2.1.1. NSGA 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. NSGA will also serve as an important gateway to the wider area, with improved connectivity via the existing Neasden station and proposed 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 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 links to proposed 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 tree 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.

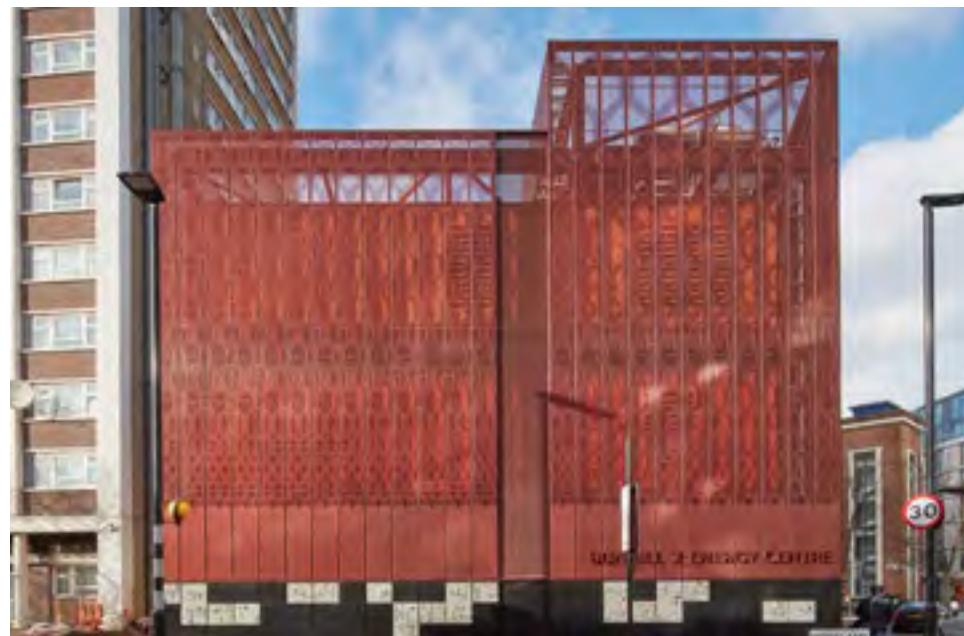
2.3.7. Development at Neasden will also utilise sustainable urban drainage systems (SUDS) to reduce flood risk and employ effective surface water run-off control measures. Green and brown roofs, ponds, swales, rain gardens and permeable surfaces will all add amenity value to landscapes and open spaces.



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

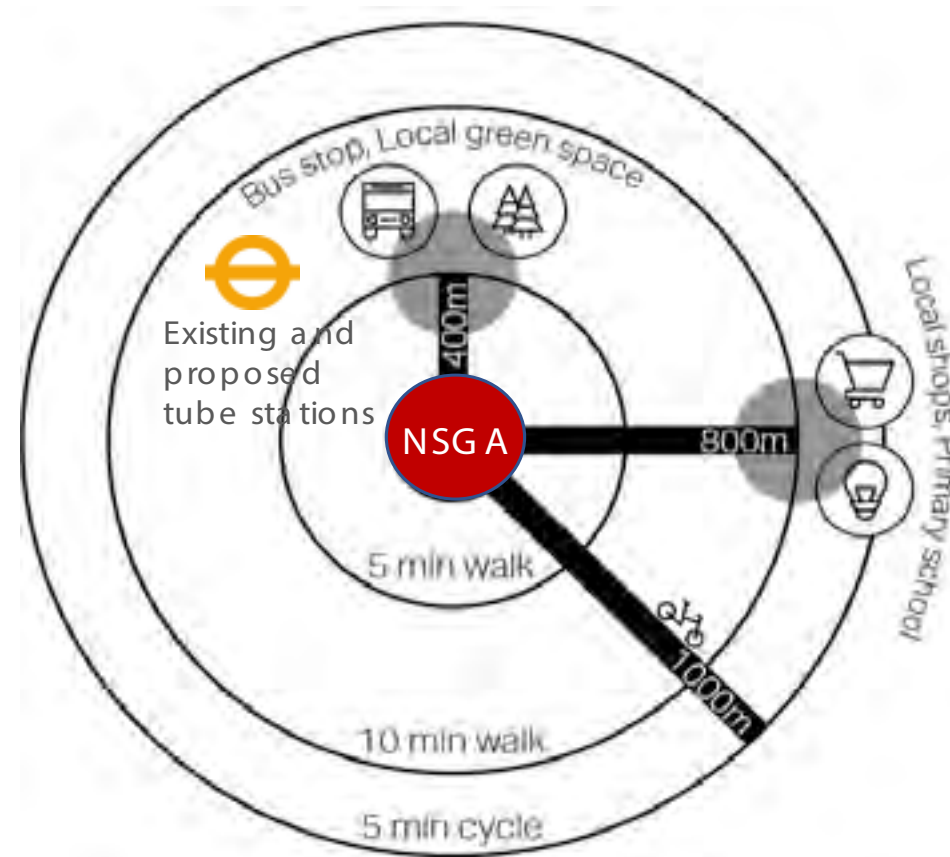
2.3.13. A connected Neasden will be accessible and easy to move around. Well-designed streets will play an important role in the local movement network, significantly enhancing connectivity and interaction within the neighbourhood, improving people's quality of life and supporting the creation of a sustainable,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



Provisions for cycling infrastructure



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



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 accommodating 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



NSGA promotes an inclusive community for all ages and groups



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



'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.

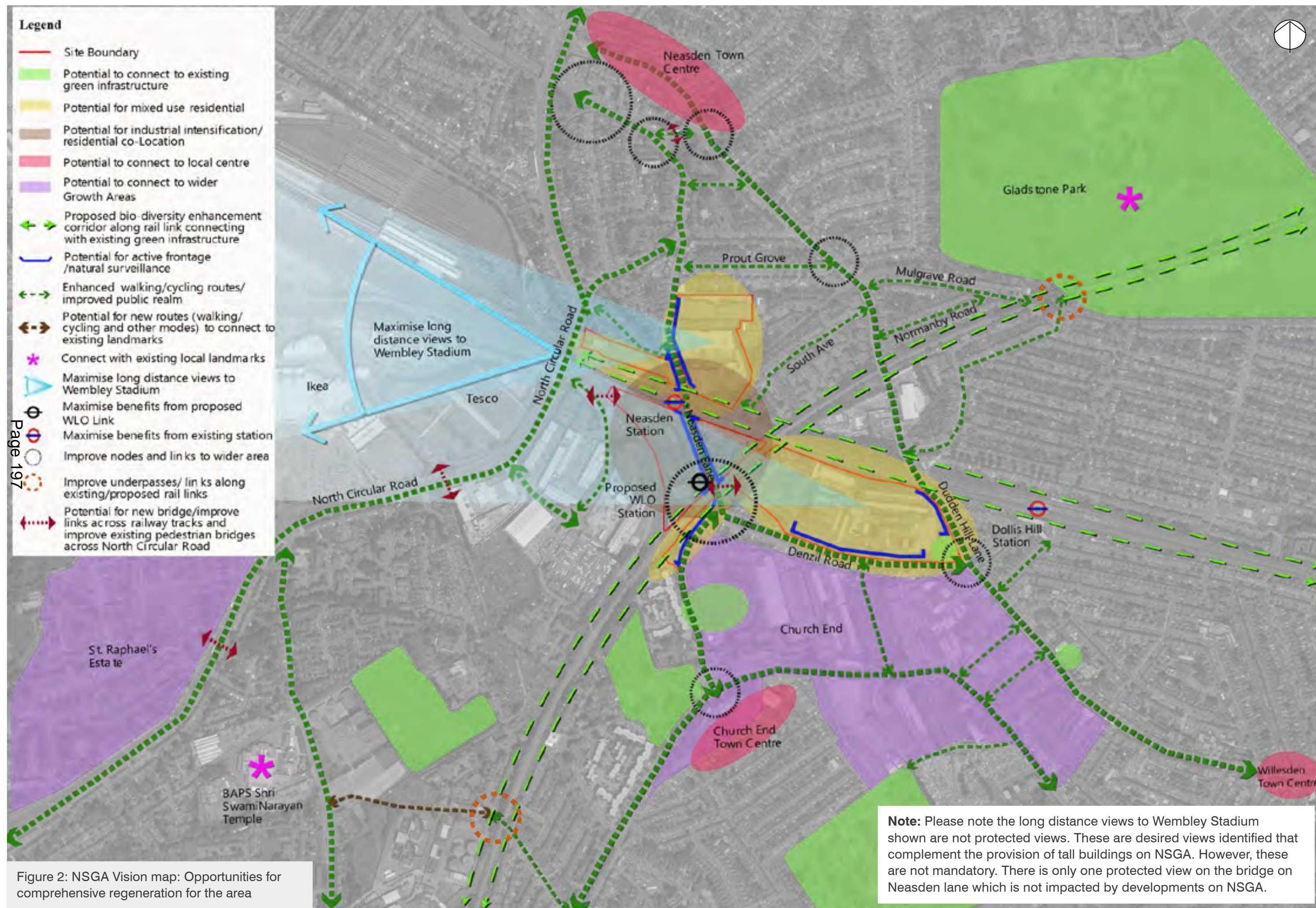


Figure 2: NSGA Vision map: Opportunities for comprehensive regeneration for the area

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 with Cricklewood/Brent Cross, Wembley, Old Oak & Park Royal, Heathrow, and the Great West Corridor Opportunity Areas along its route with improved public transport accessibility.

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 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 NSGA 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. The 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 alongside the existing Neasden Station will improve public transport accessibility 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.

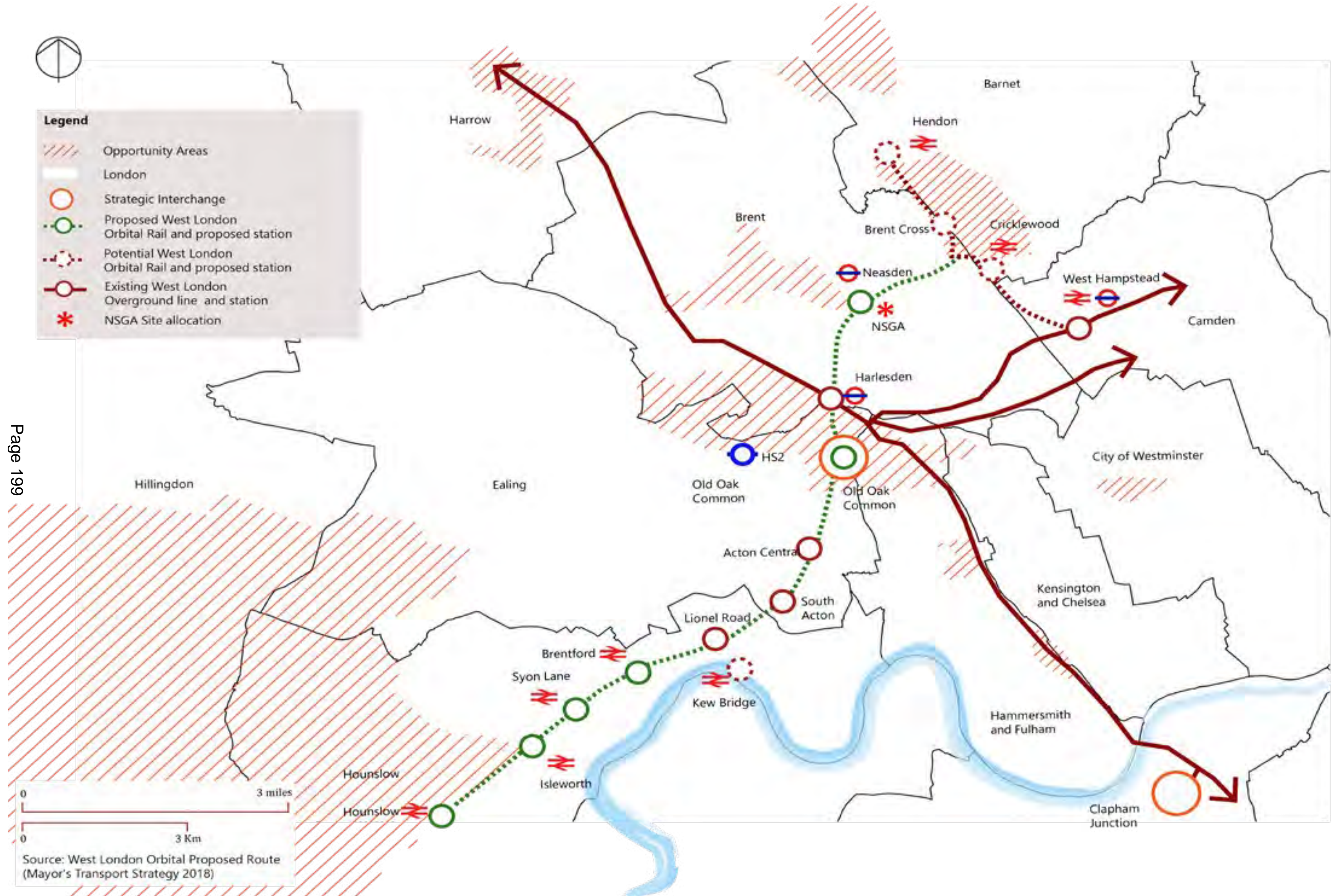


Figure 3: Proposed West London Orbital (WLO) route

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 not 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. Crossing design and locations should be planned such that they meet pedestrian desire lines. 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 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 WLO link and **Figure 4** shows the strategic location of NSGA in the wider context of West London.

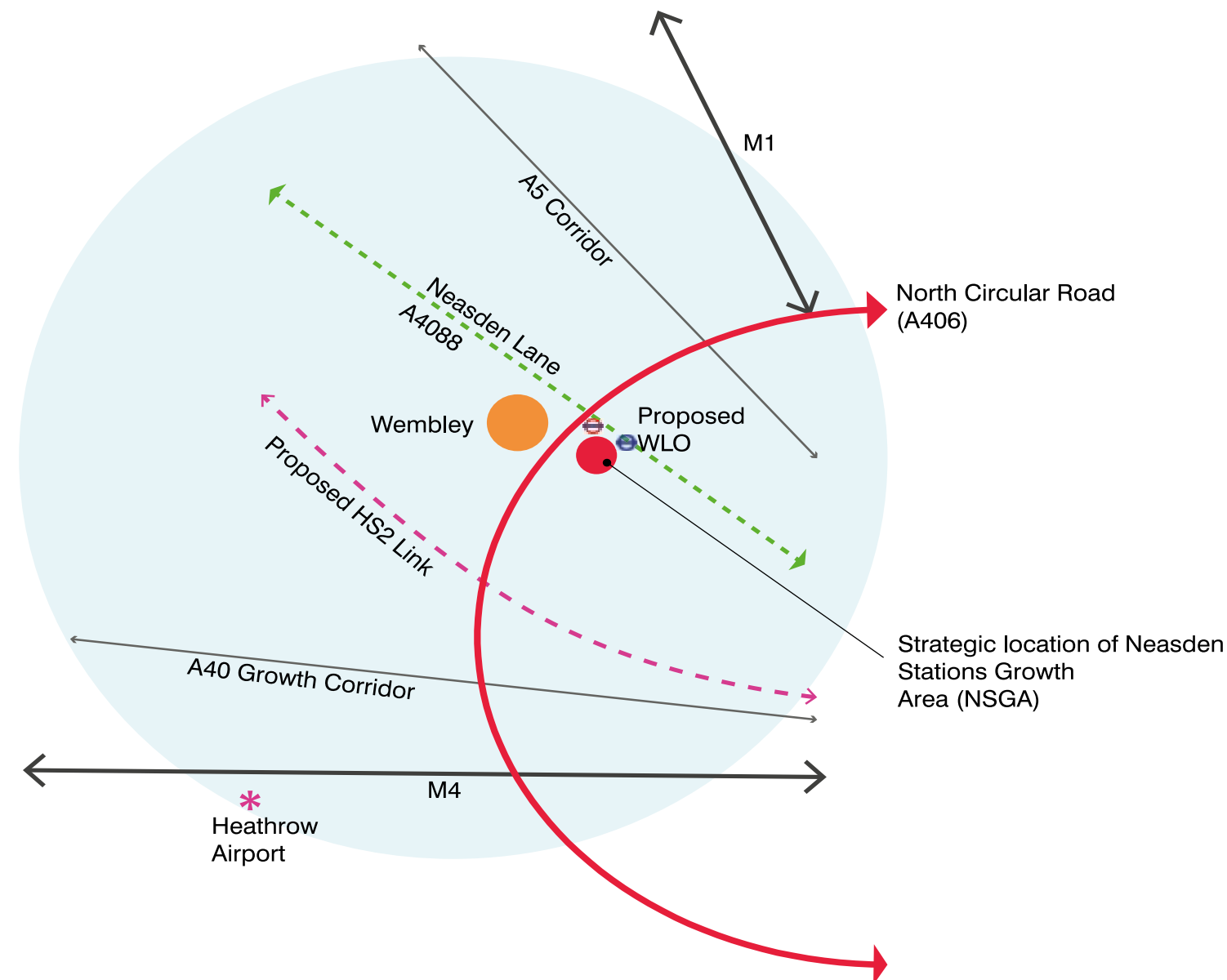


Figure 4: Illustrative movement sketch of the strategic location of Neasden Stations Growth Area



3. PLANNING POLICY

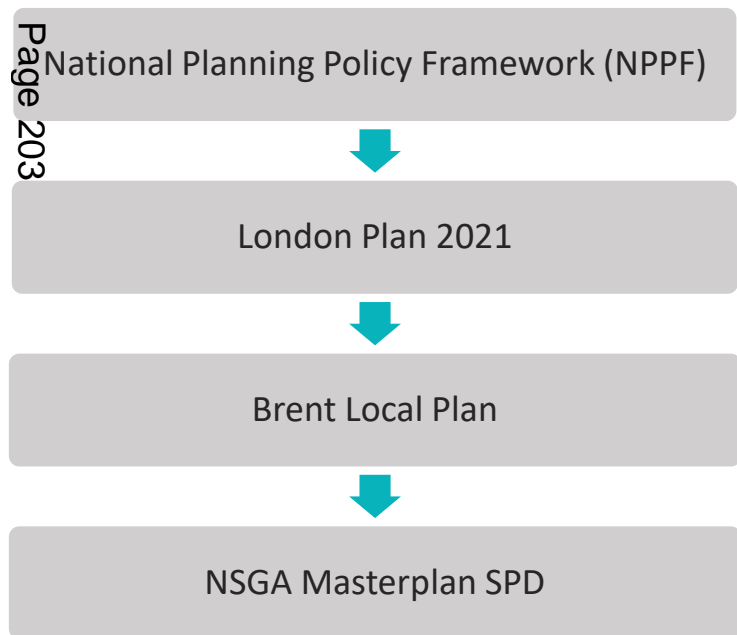


Figure 5: NSGA Policy Framework



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 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

3.1.3. The 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. Once 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 that come forward in the NSGA Growth Area.

3.1.4. The relevant 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 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**) 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. **Policy BE2:**

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 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 SIL and 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 Brent Local Plan safeguards SIL and LSIS for industrial uses. Policy BE2 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), Brent Local Plan, Brent Design Guide SPD1, Brent Tall Building Strategy, GLA Industrial Intensification and Co-location Study 2018, Good quality Homes for all Londoner's guidance, and London Plan Policy SI1 Improving Air Quality.

3.1.14 **West London Orbital (WLO):**

The proposals for the WLO aims to link Hendon/Brent Cross/Cricklewood/West Hampstead in the northwest to Hounslow in the west. The route would provide orbital connection across North and West London, unlocking the potential for new jobs and homes, connecting to town centres, employment hubs and existing and future transport links to London Underground, London Overground, Elizabeth Line, National Rail and High Speed 2 interchanges.

TfL and the WLA are assessing a full range of options that could enable sustainable growth, improve connectivity and increase public transport capacity in west London. The WLO is currently at the feasibility stage, and TfL and the WLA are working together to identify a range of funding mechanisms that could be used to secure funding for the scheme.



View of Neasden Lane between McGovern site (Glynn's scrapyards) and O'Hara site

4. TODAY'S NEASDEN STATIONS GROWTH AREA



Legend

- Site Boundary
- Locally Significant Industrial Sites (LSIS)

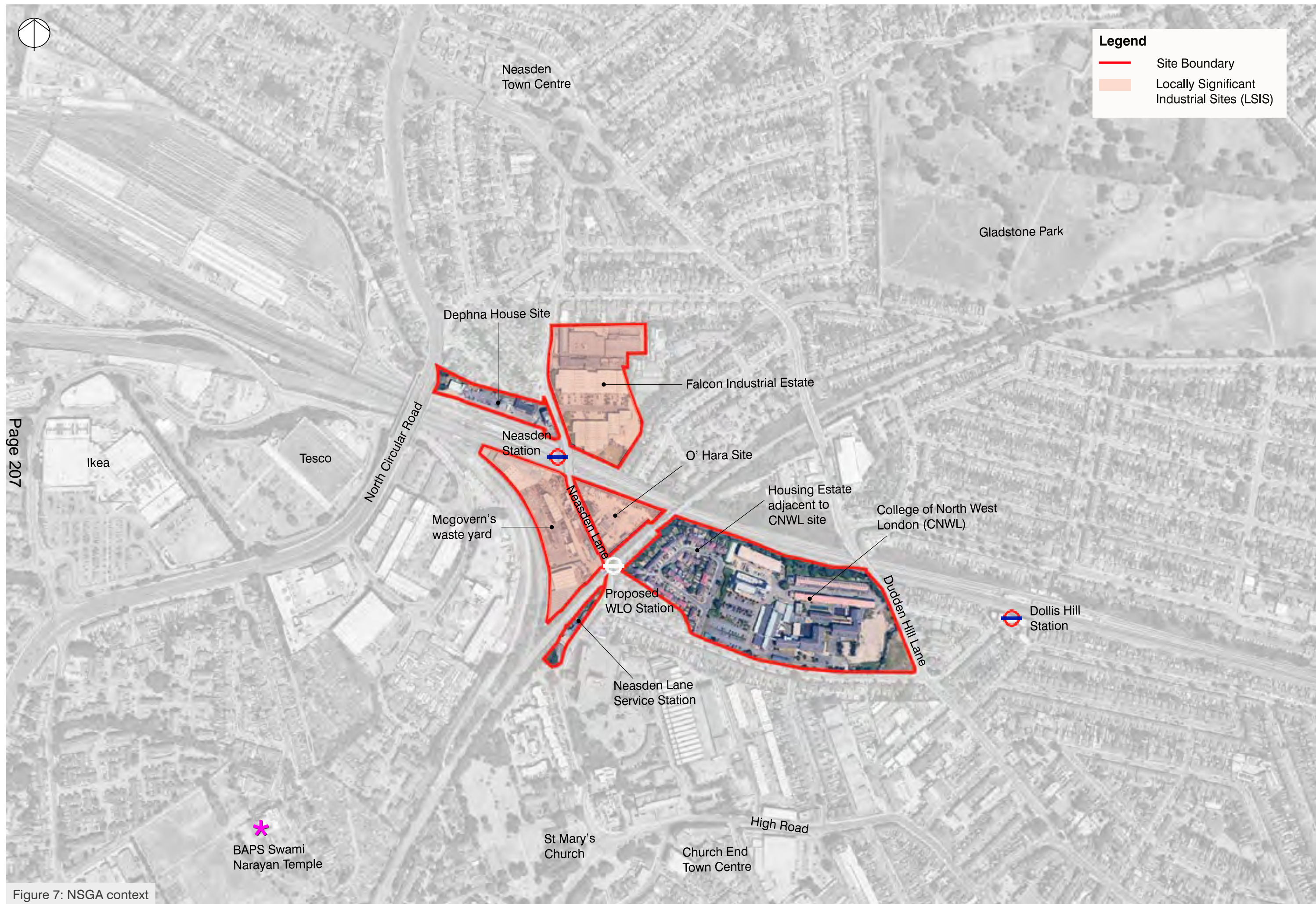


Figure 7: NSGA context

4.1 CONTEXT AND CHARACTER

4.1.1. NSGA comprises 11.5 hectares of land around Neasden station. The Growth Area is composed of six sites including three 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.

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College of North West London entrance along Denzil Road



Neasden Station



Neasden Lane industrial area



Council owned open space in front of CNWL



Two storey 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

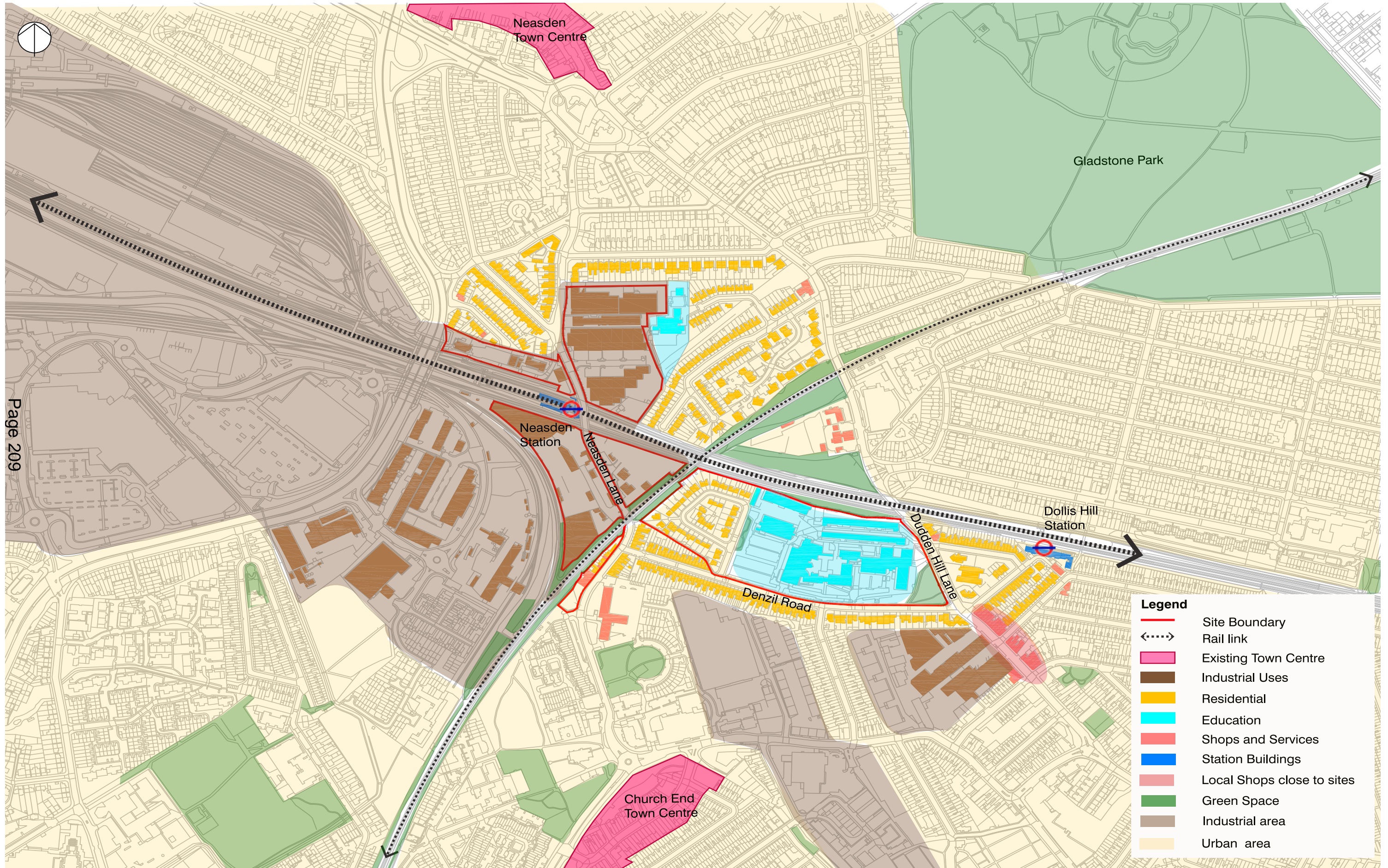


Figure 8: NSGA Land use

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 dwellings, 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:

Number	Site	Area (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
All	Total sites	11.72

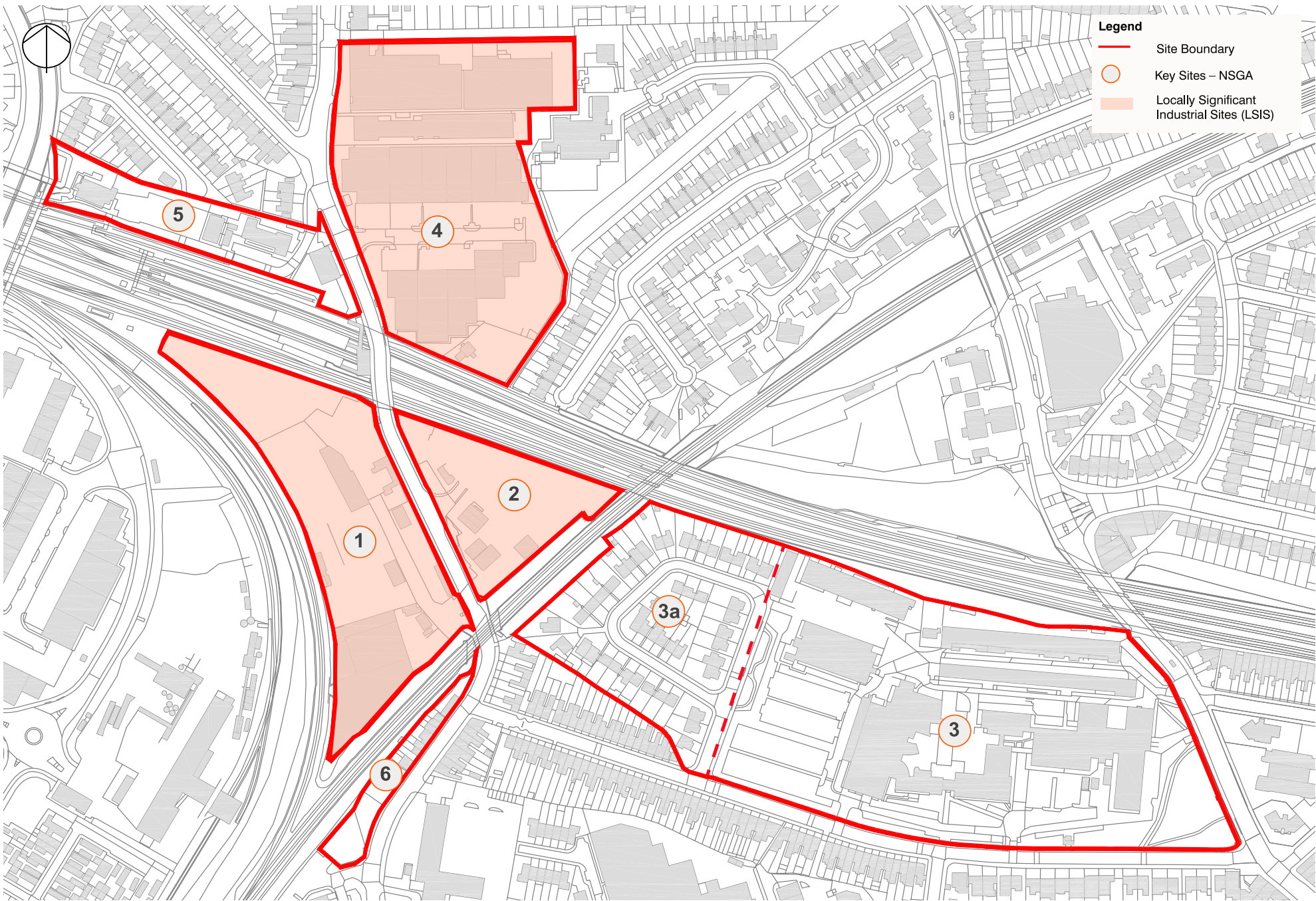


Figure 9: NSGA sites red line boundary

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.



Mural 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

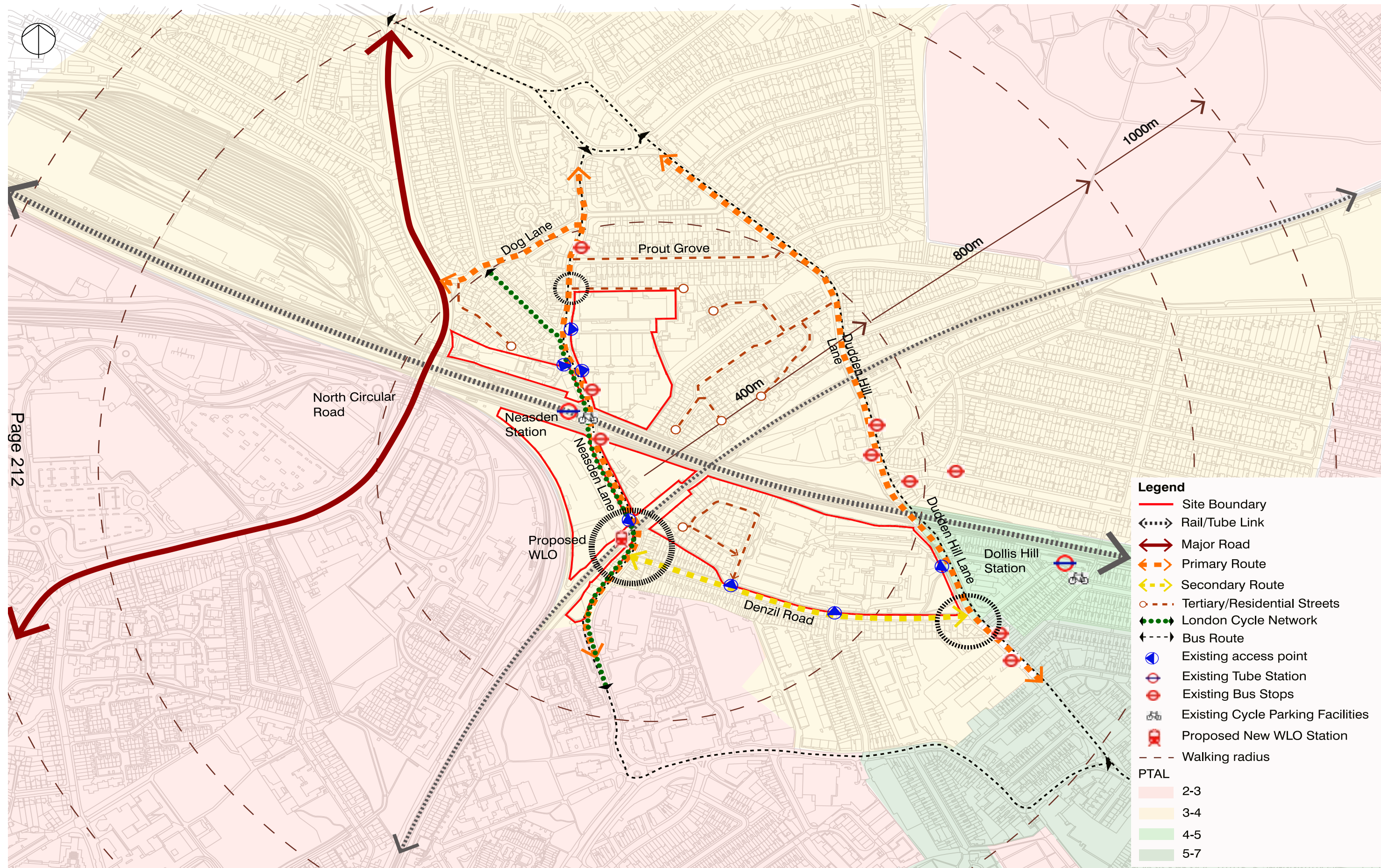


Figure 10: NSGA Movement Network

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 is a night time bus, 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 of 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 as 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 Lane, 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.

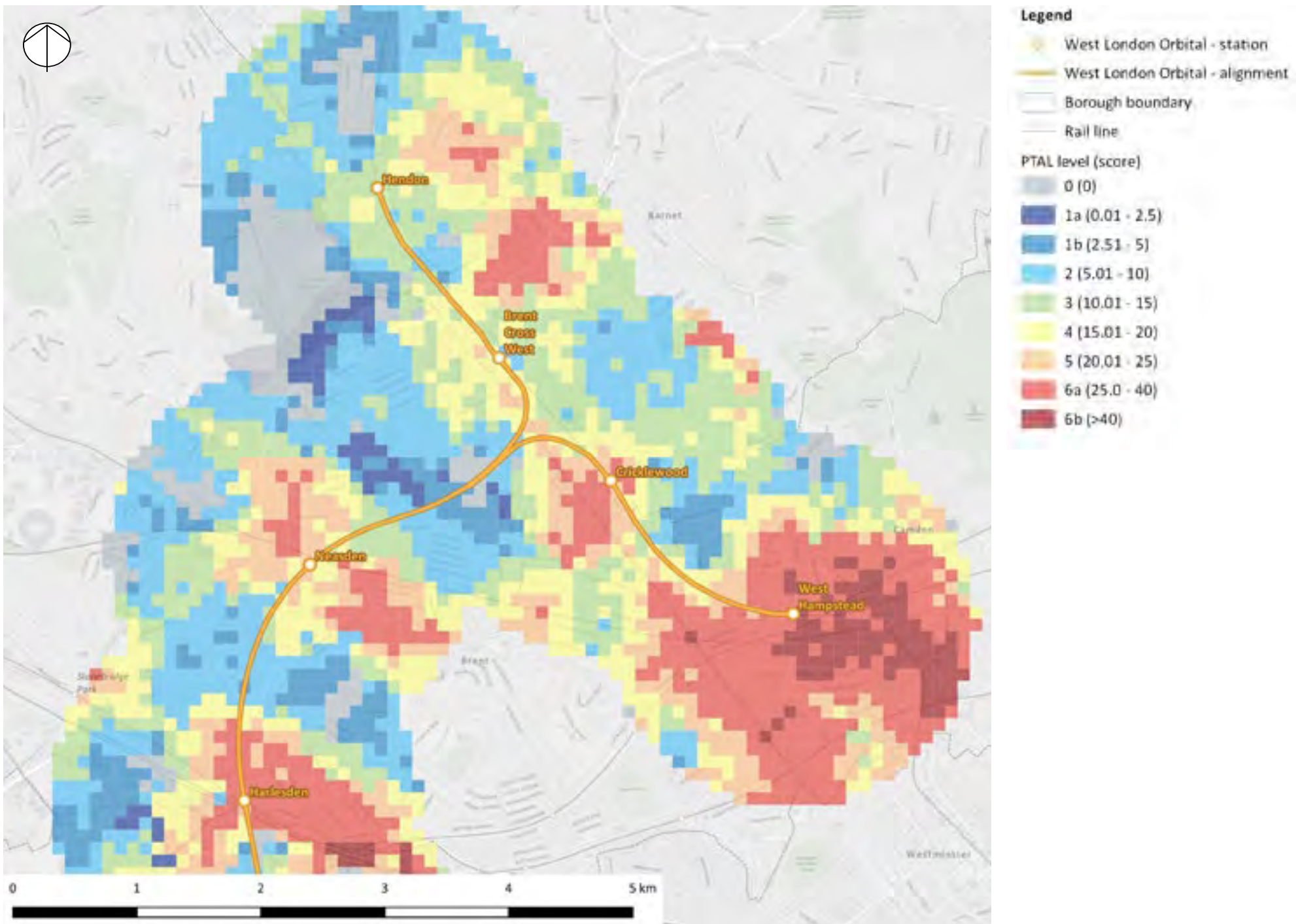


Figure 11: PTAL map. Source:

Image source: (Steer) West London Orbital: Economic Development Narrative – Technical Report, November 2020.

PTAL definition – Public Transport Access Level (PTAL) is a measure of access to the public transport network. For any given point in London, PTALs combine walk times from a chosen point to the network (stations and bus stops, for example) together with service frequency data at these locations.

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 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.

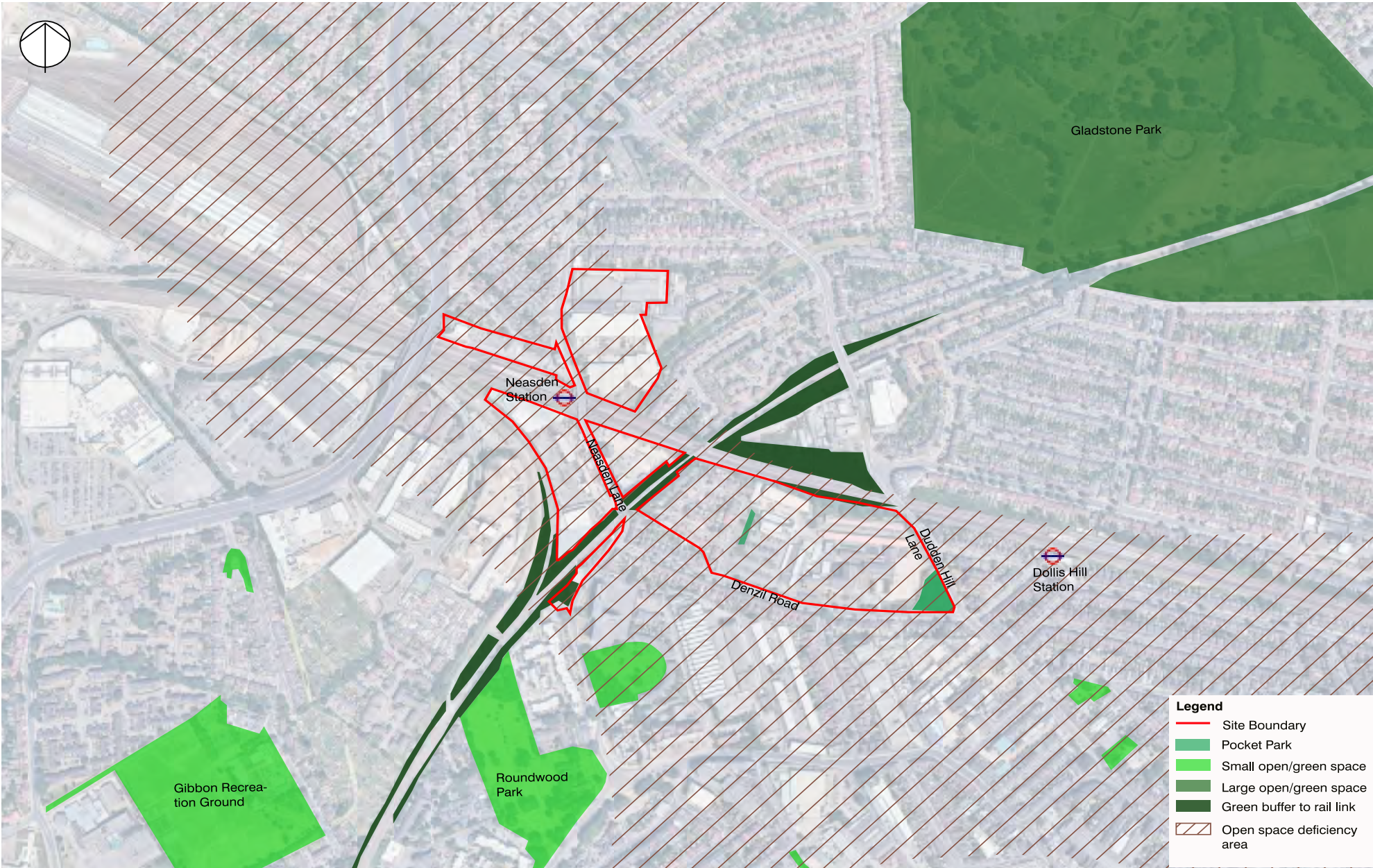


Figure 12: NSGA Open Space and Heritage

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. 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 Brent's 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. The original northbound ('down') Metropolitan Railway platform remains largely intact (the original southbound ('up') platform was converted into an existing island. Additionally, The NSGA has been identified for 'Tall Buildings' and any development must respond and plan for impacts on surrounding townscape.

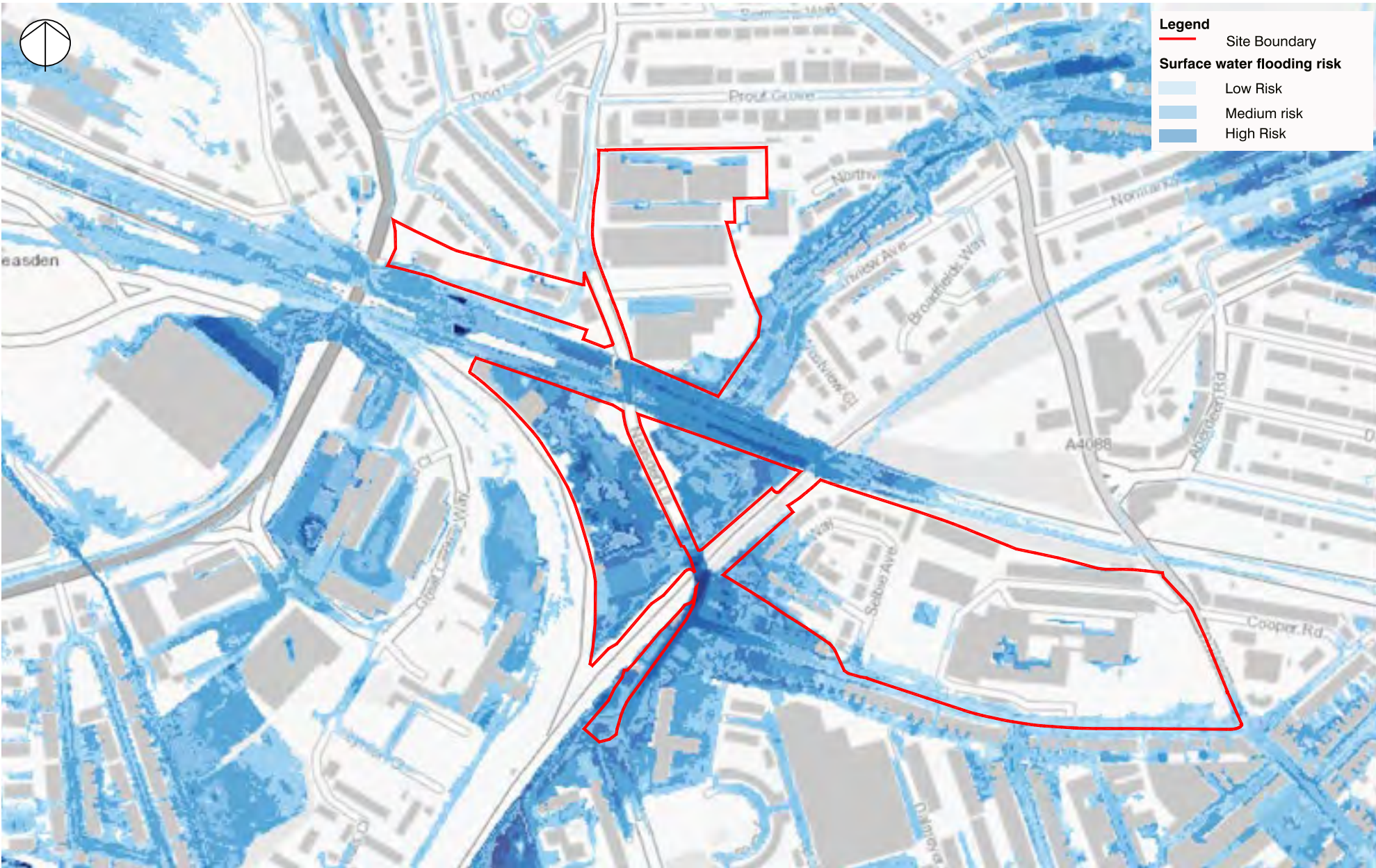


Figure 13: NSGA surface water flooding risk; source: open data gov.uk

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 of the protected waste sites in 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.

4.7 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 14: NSGA Social Infrastructure

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 locally 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 the protected view to Wembley Stadium. There are no impacts to the protected view looking towards Wembley Stadium over the bridge on Neasden Lane due to developments on NSGA.

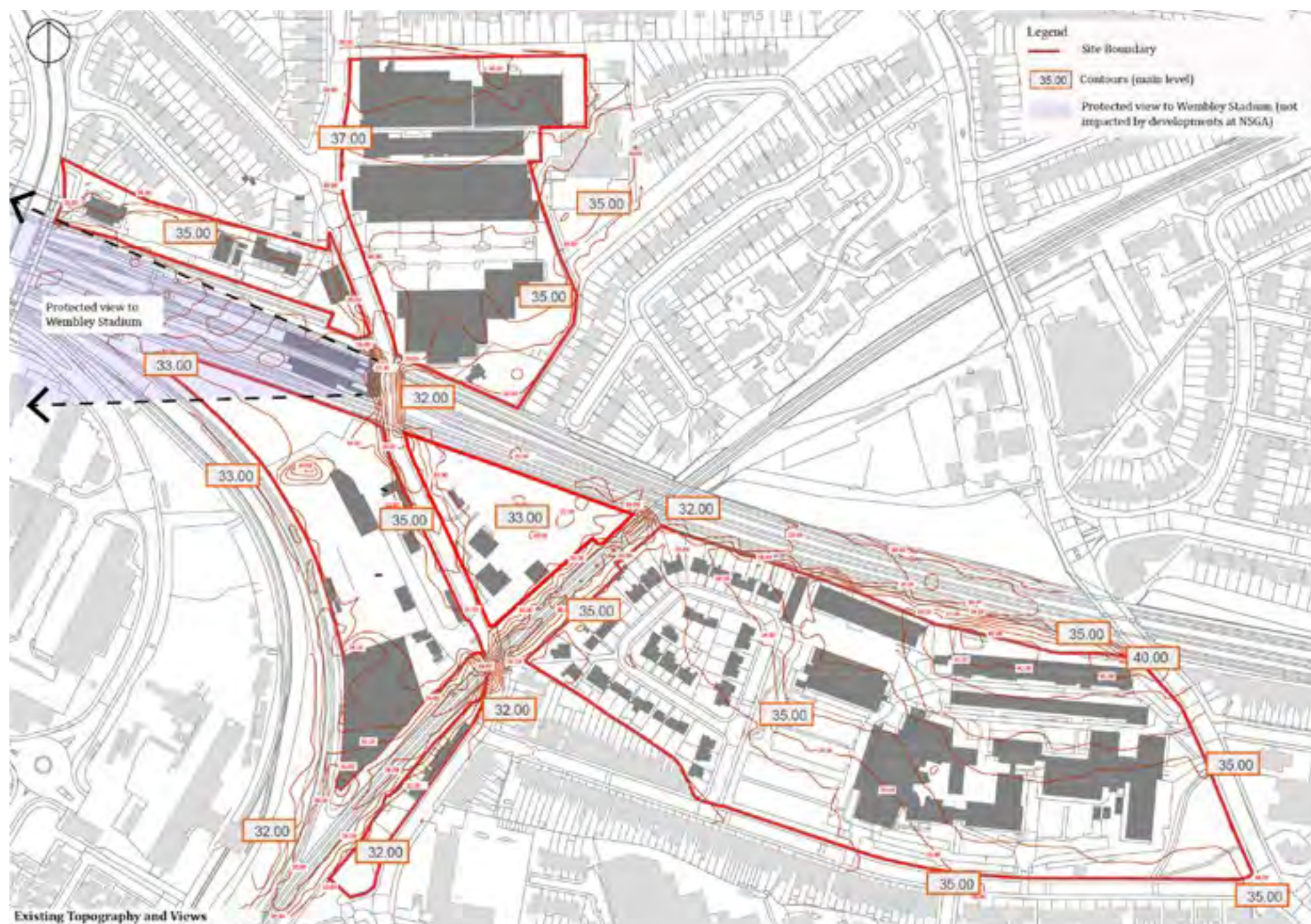


Figure 15: Topography and views

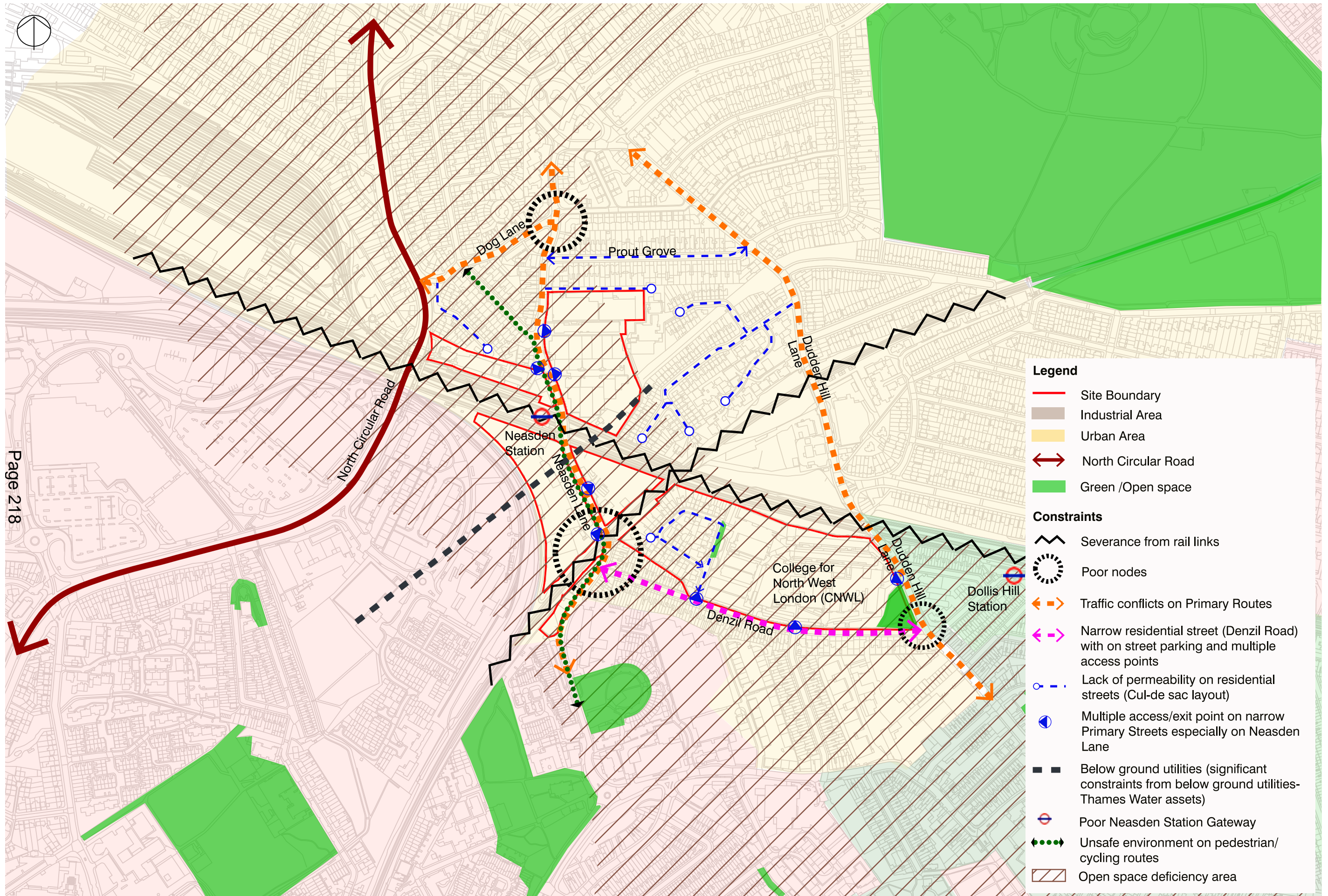


Figure 16: NSGA Constraints

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;
- Significant constraint from below ground utilities (Thames Water);
- 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'



Illustrative 3D visualisation sketch showing tomorrow's NSGA

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 PTAL with alternative options reflecting the increased accessibility generated by the proposed WLO line.

Option 1, 2a, 2b and 3 are before the WLO scenario with existing PTAL. Option 4, 5a, 5b and 6 are after the WLO scenario. The provision of WLO will improve the public transport accessibility for NSGA and consequently the potential for increased housing densities. The three scenarios tested are:

- Scenario 1. Horizontal co-location (Option 1 and Option 4);
- Scenario 2. Vertical co-location (Options 2a/2b and Options 5a/5b);
- Scenario 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.

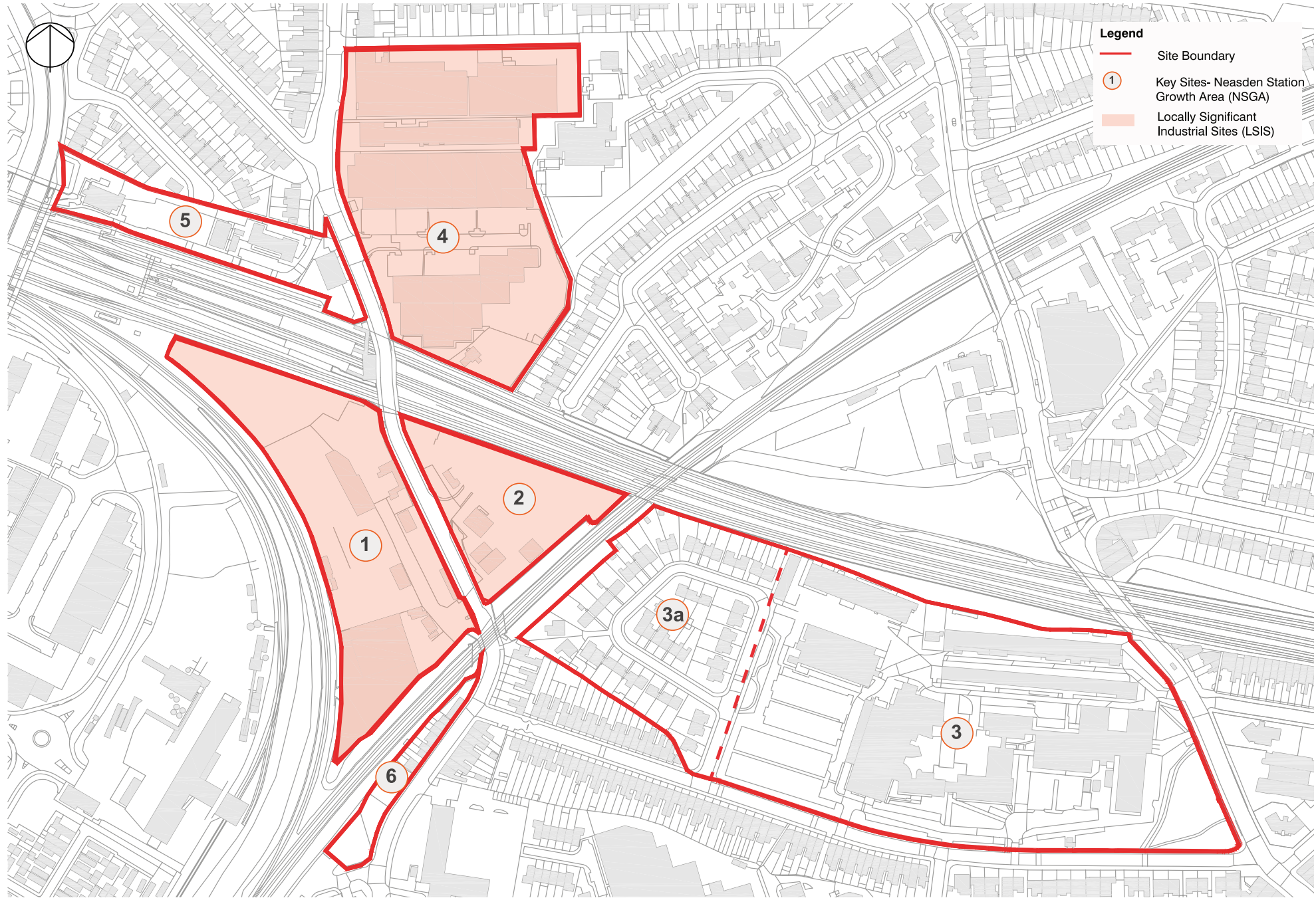


Figure 17: NSGA Sites

Scenario 1: Horizontal Co-location

Option 1:

Option 1 tests the quantum of development that can be achieved on all sites for scenario 1 (Horizontal co-location) before the WLO rail link comes forward.

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 to the college site. 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 deemed unlikely to come forward for wholesale redevelopment based on the viability assessment, but may come forward on an individual and smaller site basis for mid-rise intensification. **Figure 18** and **Table 1** shows masterplan capacity study and breakdown for Option 1.

Table 1: Capacity breakdown across NSGA for option 1

Description	Total
No. of units across NSGA	1719
Industrial Floor Space	27308m ²
Commercial/Retail Floor Space	1075m ²
Additional Industrial Floor Space	2016m ²



Figure 18: Illustrative masterplan growth capacity Option 1 – Horizontal Co-location (before WLO)



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

Option 4:

Option 4 tests the quantum of development that can be achieved on all sites for scenario 1(horizontal co-location) after the WLO rail link comes forward.

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 (Site 3a) adjacent 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 would support. On Site 5, predominantly residential use with some light industrial use is proposed. Site 6 is deemed unlikely to come forward for wholesale redevelopment based on the viability assessment, but may come forward on an individual and smaller site basis for mid-rise intensification. The WLO line provision means that Option 4 would be suitable for higher densities than Option 1. **Figure 19** and **Table 2** shows masterplan capacity study and breakdown for Option 4.

Table 2: Capacity breakdown across NSGA option 4

Description	Total
No. of units across NSGA	2069
Industrial Floor Space	27308m ²
Commercial/Retail Floor Space	1200m ²
Additional Industrial Floor Space	1016m ²



Figure 19: Illustrative masterplan growth capacity Option 4 – Horizontal Co-location (after WLO)



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

Scenario 2: Vertical Co-location

Option 2a and 2b:

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

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 (Site 3a) adjacent to the college site. 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 deemed unlikely to come forward for wholesale redevelopment based on the viability assessment, but may come forward on an individual and smaller site basis for mid-rise intensification. **Figure 20** and **Table 3** and **4** shows typical masterplan capacity study and breakdown for Option 2a and 2b.

Table 3: Capacity breakdown across NSGA for option 2a

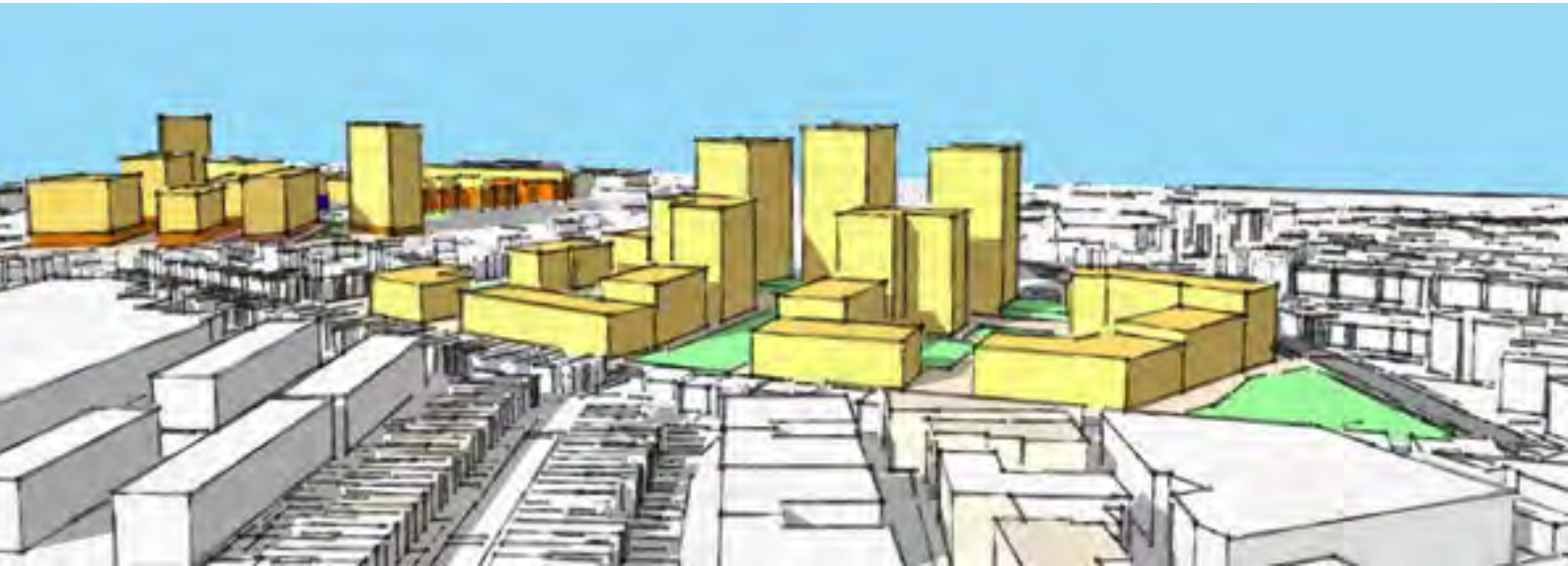
Description	Total
No. of units across NSGA	2074
Industrial Floor Space	26808m ²
Commercial/Retail Floor Space	1300m ²
Additional Industrial Floor Space	1416m ²

Table 4: Capacity breakdown across NSGA for option 2b

Description	Total
No. of units across NSGA	2074
Industrial Floor Space	16508m ²
Commercial/Retail Floor Space	13950m ²
Additional Industrial Floor Space	8884m ²



Figure 20: Typical illustrative masterplan growth capacity Option 2a (Industrial) and 2b (commercial) – Vertical co-location (before WLO)



Illustrative 3d massing sketch of Option 2a – Vertical Co-location (Industrial)

Option 5a and 5b:

Option 5a and 5b tests the quantum of development that can be achieved on all sites for scenario 2 (vertical co-location) after the WLO rail line comes forward.

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 (Site 3a) 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 deemed unlikely to come forward for wholesale redevelopment based on the viability assessment, but may come forward on an individual and smaller site basis for mid-rise intensification. WLO line provision on this option means it would 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.

Table 5: Capacity breakdown across NSGA for option 5a

Description	Total
No. of units across NSGA	2452
Industrial Floor Space	26768m ²
Commercial/Retail Floor Space	1050m ²
Additional Industrial Floor Space	1476m ²

Table 6: Capacity breakdown across NSGA for option 5b

Description	Total
No. of units across NSGA	2452
Industrial Floor Space	22308m ²
Commercial/Retail Floor Space	5800m ²
Additional Industrial Floor Space	2984m ²



Figure 21: Typical illustrative masterplan growth capacity Option 5a (Industrial) and 5b (Commercial) – Vertical Co-location (after 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 quantum of development that can be achieved on all sites after the proposed WLO rail line comes forward.

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 (Site 3a) 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 deemed unlikely to come forward for wholesale redevelopment based on the viability assessment, but may come forward on an individual and smaller site basis for mid-rise intensification. WLO line provision on this option means it would 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 (Site 3a) adjacent to the college site is a long term aspiration and is not suggested for redevelopment in the short and medium term.

Table 7: Capacity breakdown for option 6 across NSGA

Description	Total
No. of units across NSGA	2452 - 3015
Industrial Floor Space	26160m ²
Commercial/Retail Floor Space	1800m ²
Additional Industrial Floor Space	868m ²



Figure 22: Illustrative masterplan growth capacity Option 6 – Optimised Co-location (after WLO)



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

Preferred Option

Optimised Co-location Option 3:

Option 3 tests the quantum of development that can be achieved on all sites before the proposed WLO rail line comes forward.

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 (3a) adjacent to it. 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 deemed unlikely to come forward for wholesale redevelopment based on the viability assessment, but may come forward on an individual and smaller site basis for mid-rise intensification. Figure 23 and Tables 8 and 9 shows masterplan capacity study and breakdowns for Option 3. Figure 23a heights plan shows where the tall building elements can be accommodated within the NSGA. However, please note this is guidance on how a comprehensive height strategy can be brought forward and not the only way this can be achieved. Individual schemes will be assessed when they come forward for planning and expected to consider the surrounding townscape while planning for heights and massing.

Table 8: Capacity breakdown for option 3 across NSGA

Description	Total
No. of units across NSGA	2338
Industrial Floor Space	26160m ²
Commercial/Retail Floor Space	1600m ²
Additional Industrial Floor Space	768m ²

Summary

5.2.11. Having tested a number of different scenarios to understand and establish the appropriate quantum of development for NSGA, both before and after the WLO coming forward, the Council is taking forward the optimised co-location scenario as its approach to future development. Option 1, 2a, 2b, 4, 5a, and 5b present significant delivery challenges, especially with identified constraints to movement network and lack of industrial traffic segregation with more vulnerable road users. Optimised co-location options 3 (before WLO) and 6 (after WLO) offer the best outcome with optimised housing delivery and industrial capacity on podium floors segregating industrial traffic with more vulnerable uses. The Council is supportive of the WLO coming forward, but with WLO not guaranteed, the Council must plan for developments outpacing its delivery.

Therefore, the Optimised co-location Option 3 before the WLO would inform the design principles and assumed quanta of development of schemes that come forward for development in the short to medium term. Consequently, the urban design framework set out in Section 6 is based on Optimised co-location Option 3. Should it be evident that the WLO would proceed, the SPD will likely be reviewed. Prior to this review, option 6 would form the basis of changed assumptions about potential development capacity on individual sites.

Table 9: Individual site capacity breakdown Option 3

Number	Sites	Existing Site Area (Ha)	Existing Site Area (Sqm)	Existing Floor Area Ratio(FAR)	New Floor Space (Industrial) (minimum)	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	N/A	N/A	550	N/A	1100
4	Falcon Industrial Estate Site	1.61	16100	0.86	14000	0	0.86	341
5	Dephna House Site	0.68	6800	N/A	460	0	N/A	65
6	Neasden Lane Service Station Site	0.21	2100	N/A	N/A	N/A	N/A	N/A
All	Total	N/A	N/A	N/A	26160	1600	N/A	2338



Figure 23: Illustrative masterplan growth capacity Option 3 – Optimised Co-location (before WLO)



Figure 23a: Masterplan Option 3 Optimised Co-location – Heights Plan



Illustrative 3D visualisation sketch of proposed NSGA masterplan

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 minimum 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.

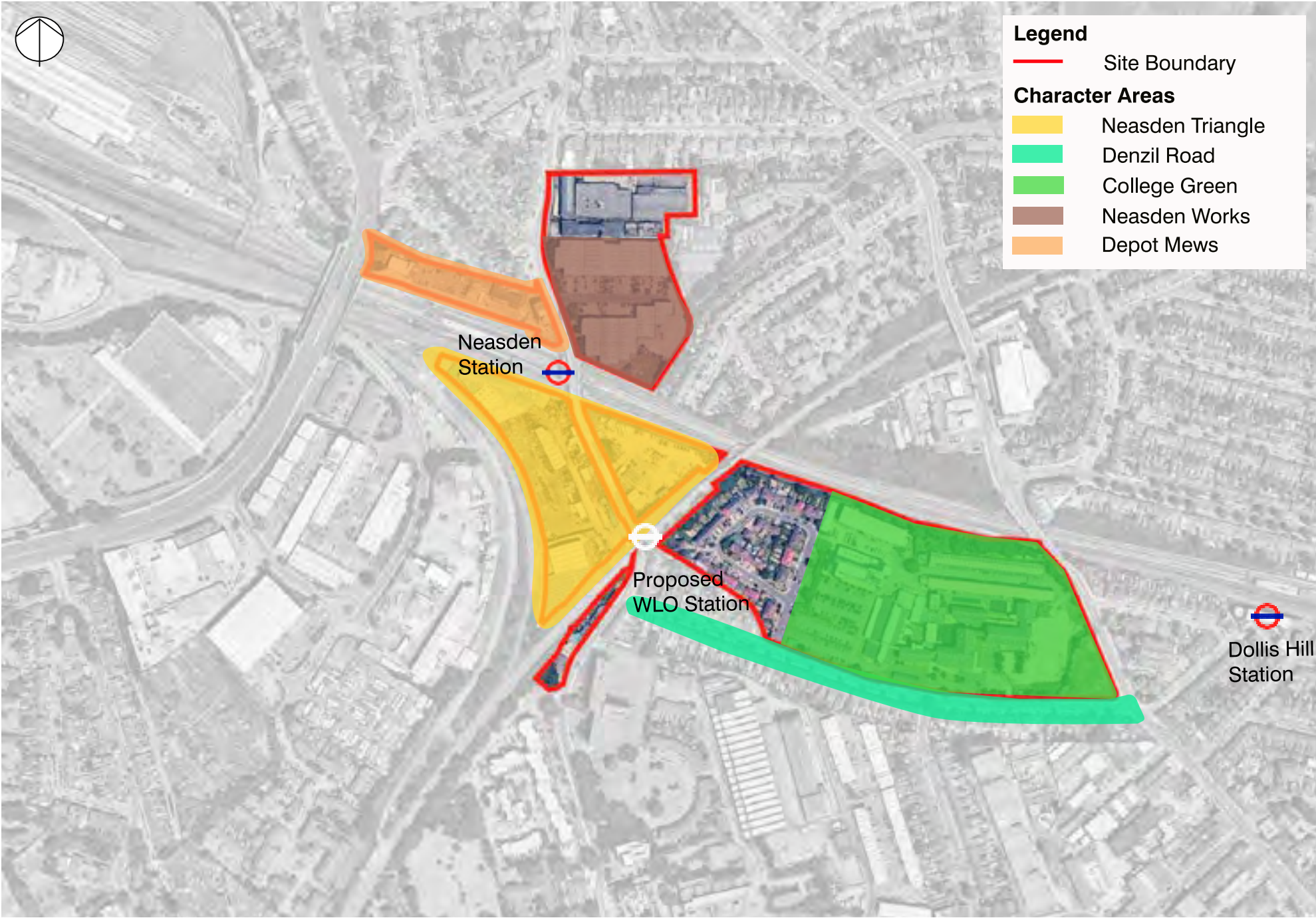


Figure 24: Character Area Map – NSGA

Neasden Triangle

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). 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** is an illustrative sketch of Neasden Triangle Character area and **Table 13** shows the breakdown of acceptable design parameters of the character area.



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

Table 13: Character area design parameters, Neasden Triangle

Description	Details
Land use	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. Tall buildings within developments must consider the potential for adverse impact on surrounding townscape and respond appropriately to mitigate such impacts
Landscape and open space type	Yards; intensified SINC; street trees; SUDS; surface water management (see Section 6.3 for open space provision)

Denzil Road



Figure 27: Illustrative sketch of Denzil Road towards the CNWL site

Table 14: Character area design parameters, Denzil Road

Description	Details
Land use	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. All new developments must adhere to Brent Design Guide SPD1 principles for privacy and amenity. Tall buildings within developments must consider the potential for adverse impact on surrounding townscape and respond appropriately to mitigate such impacts
Landscape and open space type	Street trees; SUDS; shared surfaces; front gardens; parklets (see Section 6.3 for open space provision)

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

Table 15: Character area design parameters, College Green

Description	Details
Land use	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. All new developments must adhere to Brent Design Guide SPD1 principles for privacy and amenity. (Principle 5.1: Privacy and amenity). Tall buildings within developments must consider the potential for adverse impact on surrounding townscape and respond appropriately to mitigate such impacts
Landscape and open space type	Communal courtyards; street trees; SUDS; front gardens (see Section 6.3 for open space provision)

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. Future development proposals must engage with the local community to determine the type of community functions and green spaces.

Neasden Works

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

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. Future developments must engage with local community to determine kind of uses and spaces.

Table 16: Character area design parameters, Neasden Works

Description	Details
Land use	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 (depending on GF uses); mid-rise apartment blocks; 8-14 storeys; some 5-7 storeys. Tall buildings within developments must consider the potential for adverse impact on surrounding townscape and respond appropriately to mitigate such impacts
Landscape and open space type	Yard; street trees; SUDS; surface water management (see Section 6.3 for open space provision)

Depot Mews

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.

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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 can be proposed across its extents with residential blocks above. However this is subject to detail assessment of the site. Due to the proximity of existing residential properties to the north of the site, it is considered that Depot Mews can 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. Note: Consideration for appropriate heights will be made subject to detailed design and impact assessment when sites come forward for planning. Future developments must engage with local community to determine kind of uses and spaces.

Table 17: Character area design parameters, Depot Mews

Description	Details
Land use	Residential; acceptable Research and development and light industrial Class E type of alongside commercial uses
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	Perimeter blocks (depending on GF uses); mews; 2-4 storeys; mid-rise apartment block; 5-7 storeys on Neasden Lane. Tall buildings within developments must consider the potential for adverse impact on surrounding townscape and respond appropriately to mitigate such impacts. Note: Consideration for appropriate heights will be made subject to detailed design and impact assessment when sites come forward for planning
Landscape and open space type	Podium courtyards; street trees; intensified ecology

6.3 DEVELOPMENT AMOUNT

Site 1: McGovern Yard Site

Aspect of development	Amount
New and affordable housing target	520 homes (indicative)
Industrial floorspace target	10,700sqm (minimum)
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;• Development must consider ground water utilities/assets and be located 10-15m from the assets/mains. Flooding reports will be required to understand the impact of any potential bursts on new development;• 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 and proposed WLO station;• Provision of access to the proposed WLO line station;• Proposed WLO station to meet relevant requirements and guidance regarding station accessibility. The station entrance must be clearly visible from the street;• 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

Aspect of development	Amount
New and affordable housing target	312 homes (indicative)
Industrial floorspace target	1,000sqm (minimum)
Commercial floorspace target	100sqm (indicative)
Site-specific considerations	<ul style="list-style-type: none">• Provision of affordable workspace (minimum 10% floorspace);• Development must consider ground water utilities/assets and be located 10-15m from the assets/mains. Flooding reports will be required to understand the impact of any potential bursts on new development;• 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 and proposed WLO 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

Aspect of development	Amount
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 and proposed WLO 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 Multi Use Games Area (MUGA) 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

Aspect of development	Amount
New and affordable housing target	341 homes (indicative)
Industrial floorspace target	14,000sqm (minimum)
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 and proposed WLO 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

Aspect of development	Amount
New and affordable housing target	65 homes (indicative)
Industrial/commercial floor space 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 and proposed WLO 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 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 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 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. 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 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.
- Developments must ensure inclusivity and plan for all user groups.

DP2: Local neighbourhood parades

6.4.6. London Plan Policy SD6 Town centres and high streets and 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 500sqm required to submit an Impact Assessment. As such, outside of town centres, 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.
- Developments must ensure inclusivity and plan for all user groups.

DP3: Local employment and affordability

6.4.8 West London Employment Land Review (2019) identifies a need for industrial floorspace in Brent to meet the growing demand for business uses. Given the limited opportunity for new industrial land, the Local Plan seeks to retain and intensify existing industrial sites. Neasden’s industrial stock is designated as ‘Neasden Lane’ Locally Significant Industrial Site (LSIS) in the Local Plan. It accommodates a variety of business sectors. To meet the demand to accommodate industrial uses but also provide additional homes, Brent Local Plan Policy BE2 supports mixed-use development of NSGA LSIS.

6.4.9 Policy BE2 sets out to achieve this, requiring industrial floorspace provision of the greater of either a plot ratio of 0.65 or the existing floorspace amount if this is larger. This can be through the intensification of retained wholly industrial sites or co-location of industrial with residential on sites, or a mixture of both in line with London Plan Policy E7. Master planning options and viability testing has considered how each site can best meet the strategic planning priorities and vision of the Local Plan. Section 6.3 sets out minimum industrial floor space re provision for each site. Where the residential development proposed is significantly more than the indicative housing target, the council will expect the industrial floor space to be increased above the minimum required.

6.4.10 A range of different modern and flexible industrial spaces should be created providing a range of sizes, typology and fit out. Larger units to support established companies and business growth should be balanced by smaller units to accommodate and incubate micro businesses and start-ups. These industrial uses can range between a mix of research and development, light industrial, general industrial and storage and distribution. Industrial units could accommodate local businesses to assist as part of a balanced and viable regeneration of the wider area including Church End.

6.4.11 Development of industrial land also provides the opportunity to provide affordable workspace. Brent Local Plan Policy BE1, BE2 and BE3 supports delivery of affordable workspace in NSGA. In the case of development outside LSIS, Policy BE1 requires 10% of employment floorspace developments of 3,000 sqm or more to be affordable workspace. Where new industrial floor space is proposed on LSIS, Policy BE2 requires 10% of new floorspace to be affordable workspace. Brent Affordable Workspace Strategy and Action Plan (2020) identifies a need for Incubator, Accelerator and Co-working (IAC) space, studios for creative industries and makerspace.

It also recognises an increased demand for logistics, digital and tech, food production, life sciences and the knowledge economy sectors. A minimum requirement of approximately 2,000 sqm of new affordable workspace is suggested for NSGA considering the existing quantum of industrial floorspace on site.

6.4.12 This provision will be secured through a condition/legal agreement for the lifetime of the development. The applicant should consult with an approved affordable workspace provider operator to determine the demand and suitability of the space. In exceptional circumstances, off-site provision may be acceptable, where it can be robustly justified that on-site provision is not appropriate. In that event, a financial contribution equivalent to providing such space elsewhere at a 50% discount market rate could be acceptable.

6.4.12a Brent Local Plan Policy BE1 requires an Employment and Training Plan to be prepared in partnership with Brent Works or any successor body for all major developments exceeding 5,000 sqm floor space. These measures seek to maximise opportunities for residents to enter into apprenticeships and training programmes, and provide them with new skills to help them gain access to the job market.

DP3 Recommendations:

- Development in LSIS should maximise the provision of a mix of research and development, light industrial, general industrial and storage and distribution floorspace (see Section 6.3 for a site by site for minimum floor space breakdown);
- 10% of new industrial floor space in LSIS should be affordable. Outside LSIS a minimum of 10% affordable maker or light industrial workspace is required in developments that exceed 3,000sqm employment floorspace;
- Development should contribute towards local employment training and upskilling and submit an Employment and Training Plan for construction and commercial end use training and jobs;
- Development should strengthen the local neighbourhood parade as a commercial centre with incubator/ accelerator/co-working space for small businesses;
- Development should provide a high quality environment that best allows both residential and business uses to meet occupier needs.
- Developments must ensure inclusivity and plan for all user groups.

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 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 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 BH6);
- 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).
- Developments must ensure inclusivity and plan for all user groups.

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. 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. The re-provision of the sports facilities should be informed by local need identified in Local Plan evidence base through public engagement and in partnership with Sport England;
- Development should provide a suitable level of private amenity space consistent with 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**).
- Developments must ensure inclusivity and plan for all user groups.

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 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:** 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.
- Developments must plan for active design. Please refer the [Sport England Active Design checklist](#);
- Developments must ensure inclusivity and plan for all user groups.

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 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.

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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 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.
 - As a minimum, developments will need to comply with Brent Local Plan parking standards, as set out in Policy BT2. Cycle standard –1 space per studio and 1 bedroom unit; 2 spaces per all other dwellings and visitor cycle parking: 1 space per 40 units and cycle storage.
 - Developments must ensure inclusivity and plan for all user groups.

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.
- Developments must ensure inclusivity and plan for all user groups.

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.

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.

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**
- **ESP4: 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 Building Research Establishment Environmental Assessment Method (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.
- Additional guidance: Preparing for a changing climate: Good Practice and London Plan (2021) Policy GG6 Increasing efficiency and resilience, as well as Policy S12 Minimising greenhouse gas emissions.

ESP2: Air quality

6.5.9. Given the site's location, the Council identifies it as an Air Quality Management Area. 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.
- Additional guidance: London Plan (2021), Policy GG6 Increasing efficiency and resilience, Policy S12 Minimising greenhouse gas emissions.

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 Brent Local Plan Policy DMP1 Development management.

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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. Brent Local Plan Policy BGI1 Green and Blue Infrastructure in Brent requires that development proposals achieve a net gain in biodiversity. Applicants should use tools to measure and account for biodiversity losses and gains, such as the DEFRA Biodiversity Metric, Small Sites Metric (SSM) and Environmental Benefits from Nature Tool (EBNT).

6.5.15. 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. 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.
- Development should consider biodiversity in the wider site design and aim to secure biodiversity net gain.
- Additional Guidance: Refer DEFRA Biodiversity Metric 3.0 (published July) and green infrastructure focus map in the context of landscaping, public realm and ecology.

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 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 SI13 Sustainable drainage and 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.
- Development must ensure that existing below ground water infrastructure is protected during construction;
- Development must ensure water efficiency measures and higher standards of a maximum of 110 litres per person per day is applied as the water consumption limit for all new residential development. All new non-residential development of 1000sqm gross floor area or more should meet the BREEAM ‘excellent’ standards for water consumption.

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 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 reprovion 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.

ESP8: 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 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 allowing 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.
- Additional Guidance: London Plan Policy SI8 Waste capacity provides further guidance on this. Design proposals should also give full consideration to the related requirements set out in the Brent Design Guide SPD1.

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 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, Brent Local Plan Policy BSUI1 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.



Illustrative 3D visualisation sketch of proposed NSGA masterplan

7. DELIVERY

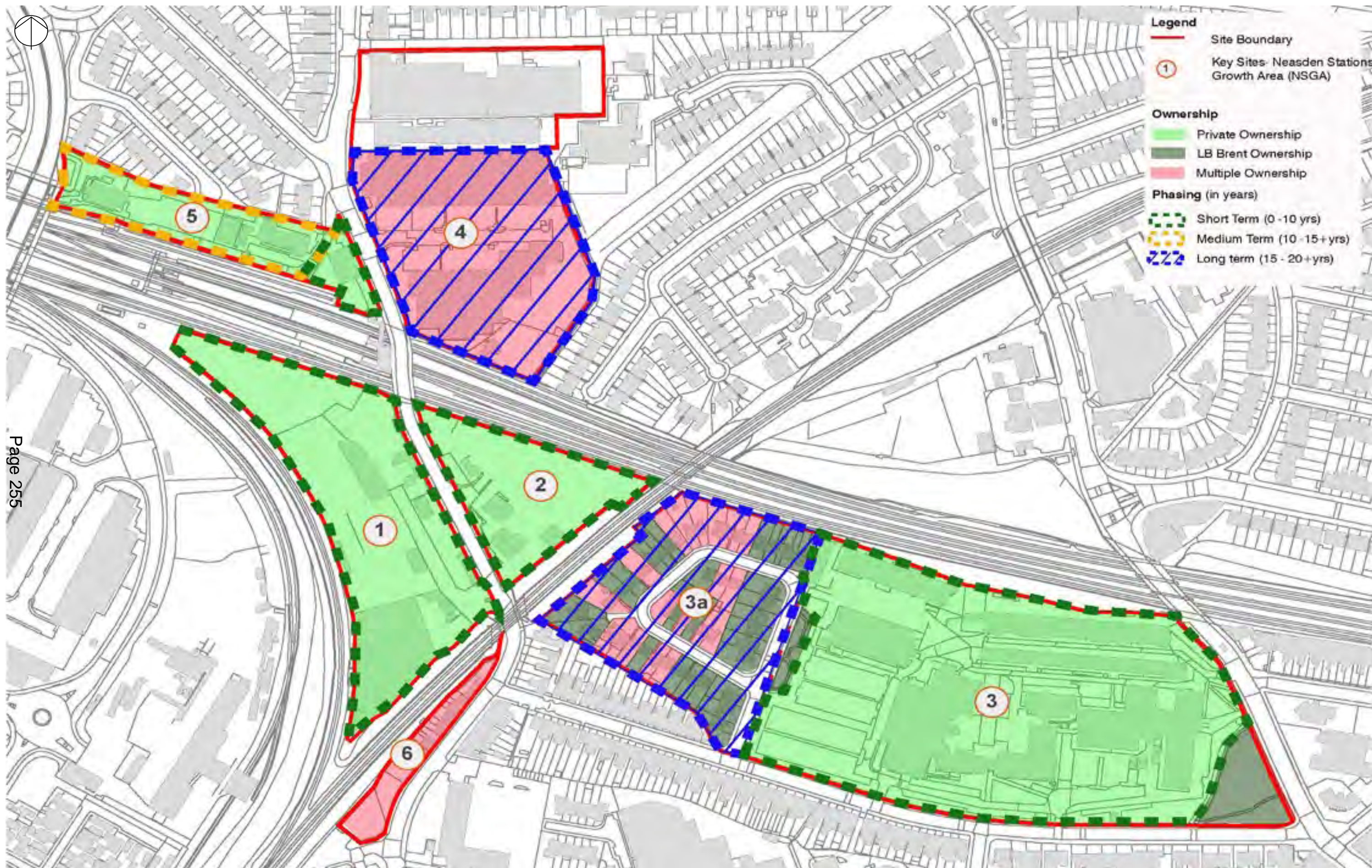


Figure 29: NSGA Land ownership and Phasing

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 private individuals, however majority are owned by the Council. Any purchase made will need to be made 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.



Case study: Large public open space, active frontage, light industrial and commercial uses housed in tall buildings similar to NSGA, Elephant and Castle, London

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: 4,200 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 floorspace (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: Barking Riverside, 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 the planning process [can be found at Brent Council's website.](#)

Further details on pre-application advice [can be found at Brent Council's website.](#)

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 **Outline Planning Permission PDF (brent.gov.uk)** [can be found at the](#)

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 **Neasden Stations Growth Area section of Brent Council's website** [can be found at the](#)

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 an independent and impartial evaluation process in which a panel of multi-disciplinary experts on the built environment assess the design of a proposal. The process is in place to improve the quality of buildings and places and is widely recognised as having a positive impact. The importance of Design Review is specifically referenced in both the National Planning Policy Framework (NPPF) and the London Plan.

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.

Further information is available at the **Design Review section of Brent Council's website** [can be found at the](#)

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 Brent Council's website.](#)


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 [can be found at the](#)

Website: **Neasden Stations Growth Area (NSGA) (brent.gov.uk)** [can be found at the](#)

Other Supplementary Planning Documents [can be found at Brent Council's website.](#)

 Brent	Cabinet 11 April 2022
	Report from the Strategic Director of Customer and Digital Services
Brent Customer Promise and Commitment	

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 1: Brent's New Customer Promise and Commitment
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Thomas Cattermole, Director of Customer Access 07918 3600030 Thomas.Cattermole@brent.gov.uk Angela Collins, Senior Transformation Officer 020 8937 2897 Angela.Collins@brent.gov.uk

1.0 Purpose of the Report

- 1.1 The report outlines the proposed new Customer Promise for Brent, which sets expectations for all interactions between the Council, our residents and customers.

2.0 Recommendation(s)

- 2.1 Cabinet is asked to consider and agree the proposal for a new Brent Customer Promise and Commitment.
- 2.2 Cabinet is asked to note that implementation of the new customer promise, the pillars that underpin it and what residents can expect from us as a council, will

be monitored and reported corporately on a quarterly basis.

- 2.3 Cabinet is asked to support the new Brent Customer Promise following formal agreement as the corporate standard, which all service areas and departments will follow.

3.0 The Proposal

- 3.1 It is proposed that the new Brent customer promise and commitment, as set out in *appendix 1*, be championed by Cabinet across the council. The four pillars that underpin the promise and the associated performance indicators will be reported to CMT on a quarterly basis.

The four pillars:

1. We commit to resolving your enquiries quickly and keeping you informed if we cannot solve them straight away.
2. We commit to listening to you, valuing you and understanding your needs.
3. We commit to making our services accessible and easy to use.
4. We commit to being helpful and honest with you.

We also set out what residents can do to help us deliver the new promise:

1. Work with us to get the information we need to help you.
2. Let us know if you have any specific needs.
3. Treat Council staff courteously and with respect.
4. Ask us if you are unsure.
5. Tell us if you have been having problems so that we can resolve them together.

- 3.2 It is proposed that all Brent Council Services and Departments use this new promise as their standard, that it is embedded as part of the procurement process, and that all published Council emails have an auto reply setting out what customers can expect.

What we expect from residents:

1. Work with us to get the information we need to help you.
2. Let us know if you have any specific needs.
3. Treat Council staff courteously and with respect.
4. Ask us if you are unsure.
5. Tell us if you have been having problems so that we can resolve them together.

4.0 Detail

- 4.1 Based on the feedback from staff and customers/residents, we suggest that the new Customer Promise be based on four key pillars, which outlines what customers and residents can expect from us. It is also proposed that we outline how they can help us to deliver this promise. It is then broken down into

sections, describing what the pillars mean and what customers can expect (See *Appendix 1*).

- 4.2 In addition to the introduction of the four pillars, we believe that it would be beneficial for all published email addresses to have an auto response email outlining response times for the relevant enquiry. We want to propose standard response times across the council, and if a department is unable to meet this, they need to be upfront in explaining why, alongside providing realistic timeframes. Ultimately, we want each department to be transparent about expected response times for each enquiry they typically receive. This more nuanced communication with customers should help manage their expectations, in turn reducing failure demand.
- 4.3 To bring the new Customer Promise in line with the digital age, it is suggested that we introduce a standardised procedure for social media enquiries. Currently, social media is not mentioned in the Customer Promise, but residents are increasingly using it as a communication tool. We suggest that social media enquiries be handled like any other, with the enquiry being channelled into the relevant department. This will mean that residents are not prioritised because they contacted us via social media, protecting those who are digitally excluded.
- 4.4 It is important that all departments sign up to the new promise, as staff are integral to its delivery. The new promise has been built upon the direct feedback of staff and it is supported by residents, boosting the promises' credibility.
- 4.5 Once agreed, the pillars that underpin the promise and the associated performance indicators will be reported to CMT on a quarterly basis.

5.0 Financial Implications

- 5.1 There are no financial implications.

6.0 Legal Implications

- 6.1 There are no legal implications.

7.0 Equality Implications

- 7.1 The new customer promise will ensure that all residents are treated equally, regardless of how they contact the council. The gaps that the new customer promise has addressed provides a positive benefit to achieving equality in the borough.

8.0 Consultation with Ward Members and Stakeholders

- 8.1 The lead member has been engaged throughout the process and is in full support.

9.0 Human Resources/Property Implications (if appropriate)

9.1 There are no HR or property implications.

Report sign off:

Peter Gadsdon

Strategic Director of Customer and Digital
Services.

BRENT PROMISE AND COMMITMENT TO YOU

Our commitment and promise sets out the standards of service you can expect from us whichever service you use

We commit to resolving your enquiries quickly and keeping you informed if we can't solve it straight away.

We commit to listening to you, valuing you and understanding your needs

We commit to making our services accessible and easy to use

We commit to being helpful and honest with you

You can help us to deliver our promise and commitment by

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Working with us to get the information we need to help you

Letting us know if you have any specific needs

Treating people who work at the Council courteously and with respect so that they can deliver the best service possible to you

Asking us to explain anything you are not sure of

Telling us if you have been having problems so that we can work together to resolve them

What it means and what we will monitor

We commit to resolving your enquiries quickly and keeping you informed if we can't solve it straight away.

- ⑩ We will resolve as many enquires as possible at the first point of contact
- ⑩ Do what we say, on time and keep you informed so you don't have to chase us
- ⑩ Make sure our staff have the skills, behaviours and tools to deliver the service you need
- ⑩ Work together with other services across the council to meet your needs and make it easier for you to get the help you need

We commit to listening to you, making you feel valued and understanding your needs

- ⑩ We will be approachable, respectful, polite and understanding when we are working or communicating with you
- ⑩ We will listen to you, treat you fairly and as an individual
- ⑩ Use your feedback to continue improving our services and your experience

We commit to making our services accessible and easy to use

- ⑩ Provide options on how you can contact us
- ⑩ If you have specific access needs, work with you to find the best way to get the help you need
- ⑩ We will make life easy for you by giving you 24/7 access to information via our website, ensuring that we provide you with access to enable you to report, pay, book or enquire about our many services online

We commit to being helpful, honest and transparent

- ⑩ Explain why decisions have been made, so you understand the reasons for them
- ⑩ Keep your personal data secure and confidential
- ⑩ If we make a mistake, we will put it right
- ⑩ Ensure all service email addresses have an 'automatic reply' which clearly explains what will happen next

What you can expect

Website / Online

- ⑩ Aim to make our website and online accessible on any device
- ⑩ Aim to keep the information as up to date as possible
- ⑩ Aim to continue to develop and improve our online offer around your needs

Face to Face

- ⑩ Make it easy for you to access our building and find what you need
- ⑩ Welcome and greet you within five minutes of arriving
- ⑩ We will take ownership of your enquiry and deal with it until it is resolved. At busier times we will let you know how long you may have to wait and let you know about other ways to resolve your enquiry where appropriate

Social Media

- ⑩ Acknowledged Monday to Friday within 2 hours
- ⑩ To ensure fairness and that those who are digitally excluded are not disadvantaged we will direct your enquiry to the appropriate team and it will be processed in line with our written correspondence

Phone

- ⑩ Aim to answer 80% of all calls received
- ⑩ Respond to voicemails and messages within 1 working day

Written - Email and Letter

- ⑩ Acknowledge written enquires
- ⑩ Respond to written enquiries (by email, post or social media) within 10 working days or sooner where possible and we will let you know if it will be longer giving the reasons why