



## Cabinet

**Monday 12 September 2022 at 10.00 am**

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

Please note this will be held as a physical meeting which all Cabinet members will be 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
M. Patel	Deputy Leader and Cabinet Member for Finance, Resources & Reform
Donnelly-Jackson	Cabinet Member for Community Engagement, Equalities & Culture
Farah	Cabinet Member for Safer Communities & Public Protection
Grahl	Cabinet Member for Children, Young People & Schools
Knight	Cabinet Member for Housing, Homelessness & Renters Security
Nerva	Cabinet Member for Public Health & Adult Social Care
Krupa Sheth	Cabinet Member for Environment, Infrastructure and Climate Action
Southwood	Cabinet Member for Jobs, Economy & Citizen Experience
Tatler	Cabinet Member for Regeneration & Planning

**For further information contact:** James Kinsella, Governance Manager, Tel: 020 8937 2063; Email: [james.kinsella@brent.gov.uk](mailto: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](https://democracy.brent.gov.uk)**

### **Notes for Members - Declarations of Interest:**

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

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

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

### **\*Disclosable Pecuniary Interests:**

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

### **\*\*Personal Interests:**

The business relates to or affects:

(a) Anybody of which you are a member or in a position of general control or management, and:

- To which you are appointed by the council;
- which exercises functions of a public nature;
- which is directed is to charitable purposes;
- whose principal purposes include the influence of public opinion or policy (including a political party of trade union).

(b) The interests of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

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

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

# Agenda

Introductions, if appropriate.

Item	Page
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<b>1</b>	<b>Apologies for Absence</b>	
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<b>2</b>	<b>Declarations of Interest</b>	
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Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate.

<b>3</b>	<b>Minutes of the Previous Meeting</b>	1 - 10
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To approve the minutes of the previous meeting held on Monday 18 July 2022 as a correct record.

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

<b>5</b>	<b>Petitions (if any)</b>	
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To receive any petitions from members of the public, in accordance with Standing Order 66.

<b>6</b>	<b>Reference of item considered by Scrutiny Committees (if any)</b>	
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To consider any reports referred by the Community & Wellbeing and Resources & Public Realm Scrutiny Committees.

## Children and Young People reports

<b>7</b>	<b>The Future of Islamia Primary School</b>	11 - 28
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This report details a proposal regarding the relocation of Islamia Primary School and seeks approval to the associated capital project business case and statutory consultation process.

**Ward Affected:**  
Queens Park &  
Preston

**Lead Member:** Cabinet Member for Children,  
Young People & Schools (Councillor Gwen  
Grah)

**Contact Officer:** Shirley Parks, Operational  
Director Safeguarding, Performance and  
Strategy

## Governance reports

### 8 Workforce Strategy 29 - 38

This report seeks approval for adoption of the Brent Council Workforce Strategy 2023-2025.

**Ward Affected:**  
All Wards

**Lead Member:** Deputy Leader and Cabinet Member for Finance, Resources and Reform (Councillor Mili Patel)

**Contact Officer:** Martin Williams, Head of Human Resources

Tel: 020 8937 3209  
Martin.Williams@brent.gov.uk

## Resident Services reports

### 9 Public Spaces Protection Order Nuisance Vehicles 39 - 94

This report sets out the rationale and seeks approval for the adoption of a borough-wide Public Space Protection Order in relation to nuisance vehicles, including scope of the order and process for implementation.

**Ward Affected:**  
All Wards

**Lead Member:** Cabinet Member for Safer Communities & Public Protection (Councillor Harbi Farah)

**Contact Officer:** Simon Egbor, ASB and Crime Manager, Community Protection

Tel: 020 8937 5853  
Simon.Egbor@brent.gov.uk

## Communities & Regeneration reports

### 10 Church End Growth Area Masterplan Supplementary Planning Document (SPD) 95 - 228

This report presents the draft Church End Growth Area Masterplan Supplementary Planning Document (CEGA Masterplan SPD) for approval for publication and statutory consultation.

**Ward Affected:**  
Roundwood & Willesden Green

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

**Contact Officer:** Alice Lester, Operational Director - Regeneration, Growth and Employment

Tel: 020 8937 6441  
alice.lester@brent.gov.uk



## Chief Executive reports

### 11 Membership of the i4B Holding Ltd and First Wave Housing Ltd Boards 229 - 232

This report recommends proposed changes in appointments to the board of the Council's two wholly owned housing companies, i4B Holdings Ltd and First Wave Housing Ltd.

**Ward Affected:**  
All Wards

**Lead Member:** Deputy Leader and Cabinet  
Member for Finance, Resources and Reform  
(Councillor Mili Patel)

**Contact Officer:** Sadie East  
Operational Director of Transformation  
Tel: 020 8937 1507  
Sadie.east@brent.gov.uk

### 12 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: Future of Islamia Primary School – Appendix 1  
(Additional Legal Implications)

This appendix is classified as exempt under Paragraph 5 of Part 1 Schedule 12A of the Local Government Act 1972, namely: "Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings".

### 13 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 their representative before the meeting in accordance with Standing Order 60.

**Date of the next meeting: Monday 17 October 2022**



- Please remember to set your mobile phone to silent during the meeting.
- The meeting room is accessible by lift and seats will be provided for members of the public. 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 18 July 2022 at  
10.00 am

PRESENT: Councillor M Butt (Chair), Councillor Mili Patel (Vice-Chair) and Councillors Donnelly-Jackson, Farah, Grahl, Knight, Nerva, Krupa Sheth, Southwood and Tatler.

Also present: Councillor Lorber

1. **Apologies for Absence**

None received.

2. **Declarations of Interest**

There were no declarations of interest made at the meeting.

3. **Minutes of the Previous Meeting**

**RESOLVED** that the minutes of the previous meeting held on Monday 20 June 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 either the Community & Wellbeing or Resources & Public Realm Scrutiny Committees submitted for consideration at the meeting.

7. **Treasury Management Outturn Report 2021/21**

Councillor Mili Patel (Deputy Leader and Cabinet Member for Finance, Resources & Reform) introduced a report updating members on Treasury Management activity during 2021-22.

In considering the report Cabinet noted the economic background in relation to the current outturn position. This included the continuing economic challenges arising from the pandemic recovery, which had been further exacerbated by the war in Ukraine and sharp increases in both inflation and interest rates. In terms of a local context, members were advised that the Council's total level of borrowing as of 31

March 22 was £684.6m arising from its capital expenditure with the underlying need to borrow for capital purposes measured through the Capital Financing Requirement (CFR), usable reserves and working capital. The underlying resources available for investment totalled £98.6m. In noting the prudential requirements within the CIPFA Code, the Council's objective in terms of investment remained to strike an appropriate balance between risk and return with a balanced portfolio of short and long term borrowing maintained.

Member's attention was also drawn to the revised Prudential Code for Capital Finance and Treasury Management Code published in December 2021, which included key changes around permitted reasons to borrow, knowledge and skills and the management of non-treasury investments. In addition, HM Treasury had issued revised guidance in August 2021 relating to the Public Works Loan Board (PWLb) lending facility, which now included examples of permitted and prohibited use of PWLB loans (including the purchase of investment assets primarily for yield). Members noted that the revised reporting requirements within the Prudential Code would be introduced during the 2023/24 financial year.

Cabinet thanked officers for their work in relation to managing the Council's Treasury Management activity and having considered the report **RESOLVED:**

- (1) To note the 2021/22 Treasury Management Outturn report and approve it being referred on to Full Council for final consideration and approval, in compliance with CIPFA's Code of Practice on Treasury Management (the Code).
- (2) To note that for 2021/22 the Council had complied with its Prudential Indicators, which were approved by Full Council on 22 February 2021 as part of the Council's Treasury Management Strategy Statement and Capital Strategy Statement.

## **8. Financial Outturn Report 2021/22**

Councillor Mili Patel (Deputy Leader and Cabinet Member for Finance, Resources & Reform) introduced a report which detailed the outturn for income and expenditure against the Council's revenue budget and capital programme for 2021/22 and other key financial data. Cabinet were informed that whilst the outturn in relation to the General Fund was in line with the forecast position and reflected a breakeven position for the year there remained a deficit (£4.6m) in relation to Dedicated Schools Grant (DSG) alongside a deficit on the Housing Revenue Account (HRA) of £0.6m. In relation to the outturn on the Council's Capital Programme, spend in 2021/22 had totalled £165m which equated to 75% of the approved budget.

In considering the outturn position, members were advised that the DSG deficit reflected increased levels of demand in Special Educational Needs and Disability (SEND) services, which were subject to an ongoing deficit management and recovery plan. Cabinet also noted the challenging budgetary impact created within Children & Young People as a result of the increase in unaccompanied asylum seeking children (UASC) along with the mitigating action being taken to offset other pressures identified as detailed in the individual service updates within section 3 of the report.

In noting the update provided, members felt it important to highlight the ambitious nature of the Council's Capital Programme including the ongoing provision for the New Council Home and other Estate Regeneration programmes, which it was felt reflected the ongoing demand for much needed affordable housing provision across the borough.

In summing up Councillor Muhammed Butt thanked the finance team for their efforts given the challenging economic background and associated impacts arising from the current cost of living crisis. In highlighting the efforts being made to continue providing services to support those residents in need it was **RESOLVED** that Cabinet note the overall financial outturn position for 2021/22.

## 9. **Medium Term Financial Outlook**

Prior to consideration of the main report, Councillor Muhammed Butt (Leader of the Council) invited Councillor Lorber, who had requested to speak on the item, to address the meeting. Referring to section 6.9 of the report, Councillor Lorber sought further details on the status of the additional scheme which it was reported had been added to the Capital Programme pipeline relating to the redevelopment of the Alperton Community Centre. Having noted the figure included in relation to the scheme (£0.8m), details were sought on any discussions with other interested parties along with any internal project work undertaken and the estimates and assumptions on which the pipeline figure within the report had been based. In addition, concerns were highlighted (following a question raised at the Full Council meeting on 11 July 22) regarding the engagement of ward councillors and the local community in the process and development of proposals relating to the site.

In responding to the comments raised, Minesh Patel (Director of Finance) advised that the addition of the Alperton Community Centre to the Capital Pipeline was as a placeholder. No business case had been prepared, with the figure provided based on an initial assumption of indicative values. Councillor Muhammed Butt (as Leader of the Council) confirmed he would be willing to arrange for local ward councillors to be updated, should this be requested, with the Council keen to consider options for the site based on available resources.

Councillor Mili Patel (Deputy Leader and Cabinet Member for Finance, Resources and Reform) then formally introduced the report which set out the overall financial position facing the Council along with the significant risks, issues and uncertainties identified in relation to the Council's Medium Term Financial Strategy (MTFS). The report also set out the proposed budget setting and consultation strategy for 2023/24.

Cabinet noted that the risks and uncertainties identified had included not only those which had existed prior to the pandemic but also new and emerging risks. Issues identified included the longer term impact of the pandemic and high levels of inflation along with the increased demand on key services and ongoing uncertainty over government funding. Despite the difficulties and financial challenges identified Cabinet also noted how the MTFS aimed to provide a framework for delivery of the Council's broader ambitions and longer term priorities. These included those identified within the Borough Plan, the recovery programme from Covid-19 the cost

of living crisis and other future steps to ensure the Council continued to operate in a financially sustainable and resilient way.

In recognising the significance of the ongoing financial challenges identified, members felt it important to also reflect on the measures taken to have delivered total cumulative savings of £196m since 2010. Despite savings of £11.2m having been delivered between 2021/22 – 2022/23 it was recognised that further savings would be required during 2023/24 – 2025/26. Whilst the 2022/23 budget had assumed savings of around £12m the current working assumption, taking account of the economic and financial environment, was that savings closer to £28m would need to be achieved in order to balance the budget between 2023/24 – 2024/25. In noting the difficulty in being able to identify precise targets, given the lack of clarity around the future level of local government funding and uncertainty over the current economic environment and inflationary pressures, members were advised that it was anticipated the Council would need to look to identify and deliver savings of approx. £20m in 2023/24 in order to be able to set a balanced budget, with the gap for 2024/25 to be reviewed once the local government financial settlement for 2023/24 was announced. These estimates would be subject to review and further refinement in preparing the 2023/24 budget, however members were clear regarding the difficult nature of decisions that would be required in order to continue to deliver services alongside an affordable and sustainable budget.

In expressing concern at the risks and significant challenges identified alongside the approach of central government in relation to the funding of local public services, members were keen to highlight their commitment to continue supporting those most in need particularly in relation to the cost of living crisis and in the ongoing recovery from the scarring created by the pandemic.

Having considered the comments made and noted the need to ensure resources continued to be utilised as effectively as possible Cabinet **RESOLVED:**

- (1) To note the contents of the report and the potential financial impact on the Council's Medium Term Financial Strategy.
- (2) To agree the budget setting process for 2023/24, including the approach to consultation and scrutiny, as set out in section five of the report.
- (3) To note and agree the proposed 2021/22 capital budget carry forwards and capital virements as set out in section six of the report.
- (4) To note the financial position with regards to the Housing Revenue Account, as set out in section seven of the report.
- (5) To note the financial position with regards to Schools and the Dedicated Schools Grant, as set out in section eight of the report.

## 10. **Q1 Financial Report 2022/23**

Councillor Mili Patel (Deputy Leader and Cabinet Member for Finance, Resources & Reform) introduced a report, which detailed the current forecast of income and expenditure against the revenue budget for 2022/23 and other key financial data.

Cabinet noted the current pressures being forecast for the year, which totalled £0.5m and reflected the increase in costs associated with the Dedicated Schools Grant (DSG) High Needs Block, along with progress against delivery of the savings target of £2.7m, as detailed within Appendix A of the report.

As highlighted during consideration of the Medium Term Financial Strategy, members also noted the significant budgetary risks identified in relation to the ongoing uncertainty around inflation and pressures the Council may face as a result of cost of living crisis, which would continue to be closely monitored throughout the year.

In addition, members were advised of the current challenges created as a result of the increase in borrowing rates impacting not only the viability of projects within the Council's Capital Programme but also the loan facility available across both i4B Holdings Ltd and First Wave Housing to support their programme of activity and acquisitions programme. In order to mitigate these challenges a variation to the loan facility had been proposed to provide both companies with greater borrowing flexibility which, given the challenges identified, Cabinet advised they were minded to support.

Having noted the ongoing challenges identified and work being undertaken to ensure the Council's overall budget position remained within target in order to continue delivering against the aims and priorities identified, it was **RESOLVED:**

- (1) To note the overall financial position and the actions being taken to manage the issues identified within the report.
- (2) To delegate to the Director of Finance, in consultation with the Deputy Leader, authority to revise the terms of the loan agreement between the Council and i4B Holdings Ltd and First Wave Housing to allow borrowing within all tenures provided by the Public Works Loan Board for the reasons detailed in paragraphs 4.10 to 4.12 of the report.

## **11. Corporate Performance - Q4 2021/22 Performance Report**

Councillor Mili Patel (Deputy Leader and Cabinet Member for Finance, Resources & Reform) introduced the report providing a corporate overview of performance information linked to the Borough Plan priorities for the fourth quarter 2021/22 (January – March 2022).

In presenting the report, Councillor Mili Patel highlighted the changes made as part of the new performance management framework developed for 2021/22 with a focus around the Borough Plan and other key corporate strategies including the Black Community Action Plan, Equality Strategy, Poverty Commission, Climate Emergency Strategy and Joint Health & Wellbeing Strategy (currently in development). Whilst also reflecting the impact of the pandemic across a number of performance indicators within priority areas, members noted the progress made as a result of the subsequent recovery programme which had led to a reduction in the number of purple ratings. These were being used to rate KPIs that were outside of target as a result of performance directly attributable to the impact of the pandemic, with the aim being to eventually phase these ratings out moving forward.

Members were keen to recognise the efforts being made to ensure the continued delivery of services within the current challenging economic and financial circumstances and work being undertaken jointly by Cabinet Members with their relevant Strategic Directors, in seeking to manage and mitigate against the strategic risks identified as part of the overall wider approach towards supporting local residents.

In response to specific issues highlighted in relation to performance on new birth visits, members noted the risk mitigation measures established with the health visiting service, which had included efforts to address the staffing recruitment and retention issues identified through meetings with the Central London Community Healthcare Trust, Integrated Care System Board and Partnership.

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

- (1) To note the performance information contained in the updated report format.
- (2) To note the current and future strategic risks associated with the information provided and agree the remedial actions on strategic risks identified as appropriate alongside the challenge on progress being provided with responsible officers as necessary.

**12. Renewal of the Special Needs Passenger Transport inter-authority service provision agreement with Harrow Council**

Councillor Krupa Sheth (Cabinet Member for Environment, Infrastructure & Climate Action) introduced a report detailing a proposal to enter into a new one year Inter Authority Agreement with Harrow Council for the provision of Special Needs Transport Services.

In considering the report, members noted that the proposal had been designed to enable a more detailed collaborative review across Regeneration & Environment, Children & Young People and Adult Social Care of the Special Needs Transport client side model, policy framework and operational delivery model pending the development of a longer term shared service arrangement with Harrow.

Members were supportive of the approach outlined and as a result **RESOLVED**:

- (1) To approve an exemption from the usual tendering requirements set out in the Contract Standing Orders 84 for good operational financial reasons in relation to entry into an inter authority agreement for Special Needs Transport.
- (2) To approve entering into a new 12 month inter authority agreement for the provision of Special Needs Transport services by Harrow Council on behalf of Brent Council from 1 August 2022 reflecting current contractual arrangements.
- (3) To note the collaborative review of Special Needs Transport as set out in paragraph 3.1.3 of the report that would assist the Council in determining its longer term options.

**13. Draft Houses in Multiple Occupation Supplementary Planning Document**



Councillor Tatler (Cabinet Member for Regeneration & Planning) introduced a report seeking approval to undertake consultation on a draft Houses in Multiple Occupation (HMO) Supplementary Planning Document (SPD).

In introducing the report, members noted confirmation of the Article 4 Direction which had removed permitted development rights for small HMOs and the incorporation within the recently adopted Local Plan of Planning Policy BH7 which set out the criteria needing to be met for HMO development to be deemed acceptable. Whilst recognising the role of HMOs in addressing housing need the criteria included factors such as location, quality and standard of accommodation (including external amenity space, communal facilities, support and care), management arrangements, impact on neighbouring amenity, level of need and seeking to avoid an over-concentration in specific areas. The SPD had been designed to assist applicants, local communities and officers in clarifying implementation of the criteria, assessing applications and detailing the expectations in relation to other London Plan and Local Plan policies relating to HMOs.

Member also noted and welcomed the way in which the SPD would be expected to clarify and complement the relationship between the planning, housing and licensing regimes in relation to the consent and management of HMOs.

Having recognised the benefits of the approach identified in relation to strengthening standards of accommodation, the protection and additional security available for occupants and in reducing any potential adverse impacts on local neighbourhood areas whilst also addressing and managing housing need, Cabinet **RESOLVED:**

- (1) To approve the Draft Houses in Multiple Occupation (HMO) Supplementary Planning Document (SPD) as set out in Appendix A of the report, to be issued for consultation.
- (2) To delegate authority to the Strategic Director for Regeneration and Environment in consultation with the Cabinet Member for Regeneration and Planning to consider consultation responses, along with any necessary changes, and the decision on whether to adopt the HMO SPD.

#### **14. Authority to Invite Tenders for an Adult Social Care Homecare Framework**

Councillor Nerva (Cabinet member for Public Health and Adult Social Care) introduced a report seeking approval to re-tender the homecare framework for Adult Social Care.

In considering the report, Cabinet noted the basis of the new homecare model which had been approved in November 2019 and reasons why the homecare framework element had not been awarded as part of the original main contract award. Recognising the need to provide as much flexibility as possible in terms of managing demand and capacity within the market, the re-tender of the homecare framework had been designed to supplement the patch based model for homecare already implemented. Members recognised the capacity building support provided for local providers in seeking to qualify for the framework as part of the Council's ongoing commitment to support local business, with it noted that the evaluation criteria would involve assessment on the basis of 90% quality and 10% social

value. In addition, Cabinet welcomed the commitment as part of implementation of the framework on providers paying care workers the London Living Wage as a minimum and working to the standards set out within the Unison Care Charter, which had been designed to reflect the value of social care work in the borough.

In terms of performance management, members were also advised of the annual review process for providers included under the framework, with members keen to consider how user feedback could also be incorporated as part of the quality standards and annual review process.

Members were supportive of the approach outlined and as a result it was **RESOLVED:**

- (1) To approve inviting tenders for a homecare framework for services for adults with disabilities on the basis of the pre-tender considerations set out in paragraph 3.22 of the report.
- (2) To approve Officers evaluating the tenders referred to in (1) above on the basis of the evaluation criteria set out in paragraph 3.22 of the report.
- (3) To approve the contractual period for homecare framework as two years, with an option to extend for periods of up to a further two years.
- (4) To agree that funding is made available to pay homecare workers under the homecare framework at the London Living Wage from year 1 of the contract.
- (5) To delegate authority to award the homecare framework to the Strategic Director, Community Wellbeing in consultation with the Lead Member for Adult Social Care.
- (6) As an additional recommendation, to consider how user feedback could be incorporated as part of the quality standards and annual review process for the framework set out within section 3.14 of the report.

#### **15. Authority to Invite Tenders for Adult Social Care Reablement Contracts**

Councillor Nerva (Cabinet member for Public Health and Adult Social Care) introduced a report seeking approval to tender for reablement services for adults.

In considering the report, Cabinet noted the current spot purchasing arrangements in place for reablement services along with the difference and clear separation between the delivery of these services compared to standard homecare. Key changes, which the proposed newly commissioned reablement service had been designed to achieve included enhanced support for those with complex needs in order to live more independently; the development of support for those already receiving care at home in addition to supporting hospital discharge; a more dynamic and flexible reablement offer; the opportunity to coordinate and align with the community rehab and the rapid response team; the ability to better support the trial and use of equipment and assistive technology and also extend reablement provision for individuals with learning difficulties and mental health issues.

As with the Homecare Framework, Cabinet welcomed the commitment included as part of the proposed tender process to offer a reablement rate that would enable providers to pay the London Living Wage as a minimum along with an increased premium in order to reflect the more short term nature of care packages being provided. Members noted that other characteristics of the model included the provider not being able to retain clients for ongoing homecare after the reablement period, the provision for visits to be extended by 15 minutes and the inclusion of a review at the end of the reablement phase, including Occupational Therapy, to ensure homecare only continued when assessed as required to address unmet needs.

Members again welcomed the approach outlined along with the capacity building support for local providers to enhance the quality of training being provided for staff, which it was felt would not only ensure improved outcome for service users but also deliver ongoing care cost reductions. As a result it was **RESOLVED**:

- (1) To approve inviting tenders for a reablement services for adults with disabilities on the basis of the pre-tender considerations set out in paragraph 3.24 of the report.
- (2) To approve Officers evaluating the tenders referred to in (1) above on the basis of the evaluation criteria set out in paragraph 3.24 of the report.
- (3) To approve the contractual period for reablement services as three years, with an option to extend for a period of up to a further two years.
- (4) To agree that funding is made available to pay reablement workers under the reablement contracts at the London Living Wage from year 1 of the contract.
- (5) To delegate authority to award the reablement contracts to the Strategic Director, Community Wellbeing in consultation with the Cabinet Member for Public Health & Adult Social Care.

#### 16. **Exclusion of Press and Public**

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


#### 17. **Any other urgent business**

None.

The meeting ended at 10.45 am

COUNCILLOR MUHAMMED BUTT  
Chair

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	<b>Cabinet</b> 12 September 22
	<b>Report from the Corporate Director of Children and Young People and Corporate Director Finance and Resources</b>
<b>The Future of Islamia Primary School</b>	

<b>Wards Affected:</b>	Queens Park, Preston
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>No. of Appendices:</b>	Part Exempt – This report refers to legal Implications that have been classified as exempt pursuant to paragraph 5 of Schedule 12A of the Local Government Act 1972: “Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	<p>Shirley Parks            Interim Operational Director, Safeguarding, Partnerships and Strategy            020 89374529  <a href="mailto:shirley.parks@brent.gov.uk">shirley.parks@brent.gov.uk</a></p> <p>Tanveer Ghani            Operational Director, Property and Assets (Acting)            020 8937 1722  <a href="mailto:Tanveer.ghani@brent.gov.uk">Tanveer.ghani@brent.gov.uk</a></p> <p>Neil Martin            Head of Capital Programmes (Schools)            020 8937 4203  <a href="mailto:neil.martin@brent.gov.uk">neil.martin@brent.gov.uk</a></p> <p>Marsha Henry            Chief Lawyer,            Property, Planning and Regeneration            020 8937 4078  <a href="mailto:Marsha.henry@brent.gov.uk">Marsha.henry@brent.gov.uk</a></p>

## **1.0 Purpose of the Report**

- 1.1 This report sets out proposals to relocate Islamia Primary School. It seeks approval for a capital project business case to develop the former Strathcona school site into a two-form entry (2FE) school for Islamia Primary School, subject to statutory consultation to relocate the school. It sets out the options reviewed, the capital project requirements and the statutory consultation needed to deliver the project.

## **2.0 Recommendation(s)**

Cabinet is asked to:

- 2.1 note the historical context and background set out in this report.
- 2.2 note that the Yusuf Islam Foundation has issued eviction notices to its Voluntary Aided Islamia Primary School and that the future options for the school are for the school to either relocate or close.
- 2.3 note the proposal to relocate Islamia Primary School to the Strathcona site as a 2FE school and agree to allocate up to £8.0m capital towards the total project costs of £10.0m, noting that the preferred option is estimated to cost £9.11m.
- 2.4 approve the delegation of authority to agree pre-tender considerations, procure and award the necessary works contracts valued in excess of £5m to the Corporate Director, Finance and Resources, in consultation with the Cabinet Member for Children, Young People and Schools and the Cabinet Member for Finance, Resources and Reform.
- 2.5 note that if the school relocated to the Strathcona school site, the site could be transferred into the name of the Yusuf Islam Foundation who would be required to hold the site for the benefit of the Islamia Primary School. Further details in terms of ownership would be set out in a Trust Deed. This would ensure that the primary school would be protected from eviction in future.
- 2.6 note that a statutory consultation process to allow the relocation of Islamia Primary School as a 2FE Primary School to the Strathcona site would need to be undertaken and that the Governing Board would be responsible for making this proposal through statutory consultation.
- 2.7 acknowledge that should the Strathcona site be used for Islamia Primary School then an alternative site would be required to deliver Post-16 SEND provision.

## **3.0 Detail**

### **Islamia Primary School Background**

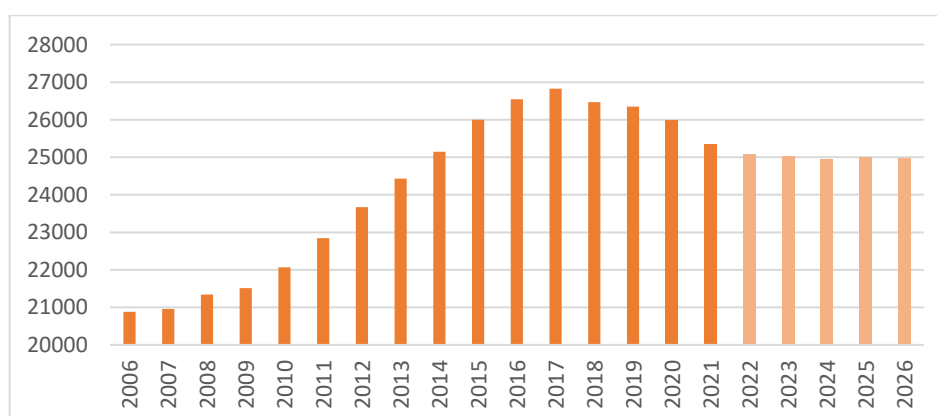
- 3.1 Islamia Primary School (IPS) was established as an independent school in 1983 by the Islamia Schools Trust. The school was granted public funded status as

a Grant Maintained school (GM) and then Voluntary Aided status in 1998. The Salusbury Road school site and buildings are owned by the Yusuf Islam Foundation, which purchased these assets from Brent Council in March 1990. The buildings also house the Islamia Girls School, an independent fee paying school established by the Islamia Schools Trust, which became incorporated with the Yusuf Islam Foundation in 2017.

- 3.2 IPS opened as a 1 Form Entry (FE) school. In 2006 when the Trustees of the near-by Avenue School, another Voluntary Aided Muslim faith primary school, decided to close this primary school, the Governing Board of IPS agreed to publish proposals to accommodate former Avenue pupils and look to formally expand in the course of development of a new-build 2FE primary school on the Salusbury Road site. This has not however progressed. Although there has been no statutory consultation to formalise the school's intake, the school has been operating as a 2FE school since 2010.
- 3.3 The school's main site continues to be situated on the Salusbury Road site, with the school also occupying the top floors of Winkworth Hall on Chevening Road via a lease agreement with the Council, which was a temporary solution to meet the school's accommodation needs.
- 3.4 The Council has undertaken significant and extensive efforts since 2015 to build a new primary school building on the existing Salusbury Road site. The Council identified capital funding to the sum of £10.01m, including ring fenced funding secured from the Education Skills and Funding Agency (ESFA) of £2.8m, to meet the then demand for primary school places. Design development for the new-build school was completed in 2015, funded from the ESFA contribution. The Foundation decided not to proceed with these plans and for the past seven years has not responded positively to the Council's attempts to revisit the build proposals.
- 3.5 During July and October 2020, the Yusuf Islam Foundation as owners of the Salusbury Road site, served notice on IPS and the Council. During January 2022, the Foundation served new eviction notices on IPS and the Council. The notices require IPS to vacate the premises they currently occupy on Salusbury Road only by 31 July 2022 and 31 July 2023 respectively.
- 3.6 IPS is one of Brent's most popular schools as the only state Muslim school in the borough. The school has 420 pupils on roll and each year the 60 Reception places are usually offered to families who applied for the school as their first preference. The school has a high sibling factor with over 80% of Reception places in September 2021 and 52% of Reception places in September 2022 offered to siblings. The majority of pupils are from Brent. The numbers of out-of-borough children offered are historically low because in recent years the school operated a catchment area which was set as within the Brent boundary. In 2020 the school removed the catchment area from its Admission Policy. As a result, the number of out of borough children has increased over the past three years. For the 2022 Reception intake, 13 of 60 Reception places have been offered to children from other boroughs, compared to 1 out of 60 in 2019, who was the child of a staff member.

- 3.7 The initial proposal to formally expand the school in a permanent 2FE building on the Salusbury Road site was made at a time when there was a shortfall of primary school places across the borough in the context of unprecedented growth in demand for primary school places. The current position is a very different one. The forecasts in the refresh of the School Place Planning Strategy agreed by Cabinet in November 2021 show a reduction in demand from 2017 onwards (Graph 1). Due to falling demand, there is now a significant surplus of places across the borough (16% of capacity across all year groups in 2021/22). The latest forecasts for Brent provided by the Greater London Authority in early June indicate that forecast demand could reduce further.

**Graph 1: Primary numbers on roll and projections as at January each year**



### **The Future of Islamia Primary School**

- 3.8 Given the eviction notices from the Yusuf Islam Foundation and the Foundation's intent for the school to leave its current site by July 2024, there are two options for the future of the school:
- For the school to relocate to a new site
  - For the school to close with pupils on roll moving to other local schools with spare places
- 3.9 As a Voluntary Aided school, Brent Council has a duty to maintain IPS, which would include considering alternative site options. IPS is a popular school and the only Islamic Primary School in the borough. For this reason, since receiving the notices the Council has been working with the Governing Board of IPS and the Yusuf Islam Foundation to identify an alternative site for the school.
- 3.10 The Foundation has agreed to withdraw the eviction notices and allow IPS to remain at Salusbury Road until July 2024 as a condition of a legal agreement between the Council and the Yusuf Islam Foundation confirming that IPS will vacate the premises by this date.
- 3.11 The Council has undertaken a comprehensive site search across the borough for an alternative site for the school. The only site that has been identified that could be available by July 2024 is the Strathcona site, Strathcona Road,



Wembley, HA9 8QW that was used for primary provision by Roe Green Infant School until July 2022. The site was proposed to the Yusuf Islam Foundation and the Governing Board of IPS, who following a site visit, agreed that it could provide a suitable alternative for the school. In 2021 officers commissioned technical consultants to undertake a feasibility study into providing a 2FE Primary School on the Strathcona site. The feasibility study looked at potential facilities, adjacencies of the facilities, costs, delivery programmes and risks with the proposed site.

- 3.12 A parent of children who attend IPS put a petition on the Council's e-petition portal between 13 July and 18 August 2022 that called for the new school in South Kilburn that will be built as part of the South Kilburn Regeneration Scheme to be allocated to IPS. The petition had 509 signatories. The new South Kilburn School is a key part of the infrastructure of the South Kilburn Regeneration Scheme and will provide a community school that will provide primary provision for families of all faiths within the area. The school is replacing Carlton Vale Infant School and Kilburn Park Junior School and the sites of these schools will be used to provide new housing and green space, respectively. The schools have been working with a design team over the past two years to develop the project to meet the school and local community's needs. The new South Kilburn School will not be available until September 2026, whereas the Foundation is requiring IPS to vacate its current site by the end of July 2024.

#### **4. Capital Project Detail: Options to relocate IPS to the Strathcona Site**

- 4.1 During October 2019, Cabinet approved the closure of the Roe Green Infant School provision on the Strathcona site (one form entry provision - 1FE) by July 2022. During the public consultation phase, it was agreed that in considering the future use of the site, officers would explore developing options for using the site to meet the demand for young people aged 16–25 years old with special educational needs (Post-16 SEND). An alternative site would need to be identified for Post-16 SEND provision in the borough should the site be used for IPS.

- 4.2 The relocation of IPS to the Strathcona site would:

1. Help meet the Council's statutory duty to provide a diversity of school places for all Brent pupils applying to the Council for a school place
2. Provide a new site for IPS to sustain its Ofsted rating of "Good"
3. Ensure that children are taught in a high quality provision setting.

It would therefore meet the following Council strategic objectives:

1. Every Opportunity to Succeed – supporting the continued improvement of early years provision and schools
2. Strong Foundations – building services around our residents and their needs

- 4.3 The building options officers have reviewed alongside the technical consultants are listed below:

1. Demolition of existing buildings on the Strathcona site and provision of a new-build two-storey 2FE School
  2. Demolition of existing buildings on the Strathcona site and provision of a new-build three-storey 2FE School
  3. Part demolition, part refurbishment of the remaining buildings and a new build for required additional accommodation
  4. Retain and refurbish all buildings on the Strathcona site and build a new block to meet 2FE accommodation requirements
  5. Maintain current accommodation on the Strathcona site for a 1FE primary school and provide bulge accommodation for the additional 1FE on roll to allow these pupils to move through the school.
- 4.4 If the school was to relocate to the Strathcona site as a 2FE school, removing the existing buildings and providing a purpose built new school would deliver appropriately sized facilities and adjacencies of linked accommodation. A two-storey option is better suited to a primary school setting than a three-storey building in line with Department for Education (DfE) guidance.
- 4.5 The timescale, however, within which the Foundation has required IPS to vacate the Salusbury Road site (by July 2024) presents a significant challenge to the delivery of a new build option. The Strathcona site building is currently a 1FE school, which has been well maintained and is in good condition. To retain the existing building and provide additional facilities for IPS to operate as a 2FE school (Option 4) would be less of a delivery risk within the timescales set by the Foundation. Option 4 would also mitigate the risk of pupils needing to be housed in temporary accommodation (that has not been identified) if there was delay to a completely new build project, as there would only be a need to build sufficient accommodation for up to 7 classrooms.
- 4.6 Given the number of spare places across the borough, consideration has been given to proposals to reduce the size of IPS. Despite the school being popular, until consultation has been undertaken on the relocation, it is not clear how many parents will want their children to attend the school on the Strathcona site. If during the consultation period a significant number of parents indicate that they would prefer to transfer their children to alternative schools rather than move to the Strathcona site, indicating reduced demand for the provision, then this option could be considered. The Strathcona site is available from August 2022 and would not require any substantial works to allow use as a 1FE building. Option 5 in paragraph 4.3 would provide temporary accommodation on the Strathcona site for seven years to allow current pupils to move through the school whilst only allowing 30 pupils (1FE) to start Reception each year. After this time, the school would remain as a 1FE school and the temporary accommodation would be removed.
- 4.7 Option 4 is the recommended option. Expanding the facilities on the Strathcona site would provide quality facilities for a 2FE primary school and create a learning environment which would support IPS to deliver a good education for pupils and opportunities that will support their working life.

- 4.8 Table 1 provides an indicative timetable for a partial rebuild project. In order to meet the Salusbury site vacation date of July 2024, which is very tight, some milestones would need to progress prior to the completion of the statutory consultation process. This would result in expenditure being incurred at risk during this period. To mitigate building programme delays, work has already commenced on the appointment of technical consultants in advance of Cabinet approval. Only in the circumstance of unforeseen events outside of the Council's control, has the Foundation agreed that IPS could remain on its current site until 2 January 2025.

**Table 1: Indicative Project Timeline**

Milestone	Start	Finish
Cabinet Business Case approval (including permission to consult on relocation)	September 2022	September 2022
Technical Consultancy Procurement and appointment	August 2022	October 2022
Contractor Procurement	November 2022	January 2023
Design Work	January 2023	July 2023
<i>Statutory Consultation on Relocation</i>	<i>October 2022</i>	<i>December 2022</i>
Planning Application	June 2023	September 2023
<i>Report on consultation</i>	<i>February 2023</i>	<i>February 2023</i>
<i>Representation Period</i>	<i>February 2023</i>	<i>March 2023</i>
<i>Cabinet approval of consultation outcome</i>	<i>May 2023</i>	<i>May 2023</i>
Construction works	October 2023	August 2024
Practical Completion	August 2024	August 2024
IPS move into Strathcona	August 2024	August 2024
School opens	September 2024	September 2024

- 4.9 The construction contract would be expected to deliver employment, work experience and apprenticeships for local people in delivering the new school.
- 4.10 Table 2 below identifies the key risks to the project. A detailed risks and issues register would be created and maintained throughout the project's delivery timeframe.

**Table 2: Key Risks**

Risk/issue description (incl. impact)	Planned mitigation or resolution	Owner
Brexit/Covid/Ukrainian conflict impacts on construction industry (labour resources, materials, deliveries)	Early engagement with suppliers Early orders to commit to resources Long-stop eviction date of 2 January 2025 agreed with the Foundation	Head of Capital Programmes
Increased demand within the construction industry meaning less interest in opportunities (consultants and contractors)	Early engagement with potential suppliers Make contract attractive to market	Head of Capital Programmes

<b>Risk/issue description (incl. impact)</b>	<b>Planned mitigation or resolution</b>	<b>Owner</b>
Increased demand within the construction industry meaning price increases above inflation leading to unaffordable projects and calls on additional financial contributions	Robust cost management Contingency figures within budget lines Economies of scale applied to procurement	Head of Capital Programmes
Local resident engagement/Planning approvals not granted	Pre-application advice with planners Resident engagement workshop(s) prior to planning submission High quality designs	Head of Capital Programmes
Site surveys identify significant issues with ground conditions – risks around cost increase and programme delay	Detailed surveys to understand site constraints Engagement with stakeholders to propose solutions	Head of Capital Programmes
Statutory approvals for the school are not successful or subject to delay	Governing body and Foundation members to garner support from school community Appropriate consultation to inform proposals.	School Governing Board/Yusuf Islam Foundation Operational Director, Safeguarding, Performance and Strategy

## 5.0 Statutory Consultation

- 5.1 The relocation of IPS would require the statutory process for making a prescribed change at a maintained school to be followed. This involves informal consultation followed by a formal statutory representation period. As a Voluntary Aided school, the Governing Board would be responsible for the proposal and complying with each step of the statutory process. The Local Authority is the decision maker and Cabinet would need to either agree or reject the proposal within two calendar months of the end of the representation period.
- 5.2 The Council would support the Governing Board in delivering the statutory consultation process. The Governing Board would need to draft a consultation document that sets out the case for the relocation and alternative options and will need to engage with all stakeholders in both Queen's Park and Preston wards.
- 5.3 It is proposed that the statutory process would commence with informal consultation in autumn 2022 and the statutory representation period would be completed by the end of the spring term in 2023. This would allow the formal proposal to relocate the school to be submitted to Cabinet for determination in May 2023. This timeline is included in Table 2 alongside the capital delivery timeline.

## 6.0 Financial Implications

- 6.1 Table 3 below includes the high level, indicative construction costs for the options listed in paragraph 4.3 above. It should be noted these are based on

early feasibility work and may require change as designs develop and more information is known.

**Table 3: Indicative Capital Costs for all options**

Option	Cost (£m)
1. Two-storey new build 2FE school	10.00
2. Three-storey new build 2FE school	9.96
3. Part demolition, refurbish the remaining buildings and new build	9.71
4. Retain and refurbish all buildings at Strathcona and build new block	9.11
5. Move into Strathcona buildings as a 1FE schools, with 1FE temporary accommodation provided on site to manage a gradual reduction in pupils	1.54

- 6.2 The expected capital costs for the preferred option are in Table 4 below. It is proposed that this is funded by a combination of remaining basic need, legacy Targeted Capital Funding (TCF) and council borrowing with the potential for additional contributions from Basic Need funding should the council receive any in future years.
- 6.3 £2.8m of TCF was transferred from IPS to Brent by the DfE in 2012 in order to manage and deliver the IPS new build following the school's unsuccessful attempt at delivering the project. As detailed in paragraph 3.4, the design of the Salusbury Road site expansion was funded using £200K of the TCF and therefore £2.6m remains. The Council has requested from the DfE that this funding is carried forward across financial years under the acceptance this project is still a vital one for the school and its pupils. Should the DfE continue to allow the council to carry this funding forward, then it would be used toward this project.
- 6.4 There is currently £2m of unallocated funding available in the Basic Need grant following Cabinet approval of the SEND Capital Programme Business Case in January 2022. Therefore, assuming project funding includes the £2.6m TCF from DfE and £2m basic need grant, £4.51m is required from alternative funds to deliver the preferred option (Option 4). Council borrowing has been identified and subject to Cabinet approval could be used for this project. Borrowing £4.51m would result in an additional revenue cost of circa £0.3m per annum. This would need to be reflected through the budget setting process for revenue.
- 6.5 If the DfE do not allow the council to use the TCF funding for this project, then £7.11m would be required through Council borrowing. The additional revenue cost of borrowing £7.11m would be circa £0.45m per annum. This would need to be reflected through the budget setting process for revenue.
- 6.6 Noting that Option 4 is anticipated to cost £9.11m (Table 4), at this stage in the project Cabinet is asked to agree to allocate up to the maximum capital funding that would be required to deliver all options, which is up to £8.0m capital towards the maximum total project costs of £10.0m.

**Table 4: Indicative Project Costs for option 4 (recommended)**

Element	Cost (£m)
Construction	6.07
Fees/Professional Services	0.91
Surveys	0.2
Statutory Costs	0.1
FF&E and ICT	1.0
Sub-total	8.28
Contingency	0.82
<b>Total</b>	<b>9.11</b>

- 6.7 The total cost of the project, including contingency, works out at £21,691 per place. This compares favourably to the mean cost per place of £23,886 from the latest National School Delivery Cost Benchmarking Report for new build primary schools.
- 6.8 Project contingency is set at a level of 10%. This reflects the early stages of the project as well as current cost uncertainty in the construction industry due to the current impact of resource and material availability.
- 6.9 The DfE expects Voluntary Aided bodies to contribute towards capital works that improve their school buildings at a rate of 10% of total costs. Conversations would need to be held with the Yusuf Islam Foundation and IPS about a contribution towards new facilities. No assumptions about a contribution have been included in the costs above.

## **7.0 Legal Implications**

### **Agreement and Deed of Surrender**

- 7.1 On 8 July and 23 October 2020 and, more recently on 19 January 2022, the Foundation served eviction notices on IPS and the Council. The notices were served under section 30 of the School Standards and Framework Act 1998 (SSFA) and section 25 of the Landlord and Tenant Act 1954 (LTA). They require IPS to vacate the premises they currently occupy at 129 Salusbury Road by *“31 July 2022 or the end of academic year 2021/22 if later”* (in the case of the July 2020 and January 2022 notices) and by *“31 July 2023 or the end of academic year 2022/23 if later”* (in the case of the October 2020 notice).
- 7.2 The Council has resisted the validity of the notices since receiving them and has repeatedly asked the Foundation to withdraw them so that the Council, the Foundation and IPS can concentrate their efforts on reaching an accommodation which suits all involved. The Foundation has agreed to withdraw the notices on the condition that the Council, the Yusuf Islam Foundation and IPS entered into an agreement to surrender and deed of surrender from the Salusbury Road site. These agreements, which are subject to final negotiations, are based on the premise that:
- a) the Foundation withdraws and/or does not seek to enforce the eviction notices;

- b) Providing the statutory procedures (as required by SSFA 1998) once concluded confirm it is feasible to do so, the School will be relocated to a new site;
- c) IPS will be able to remain in situ whilst the identified site, the Strathcona site, is prepared for the relocation;
- d) IPS will vacate the Foundation's Salusbury Road premises by 31 July 2024
- e) A long-stop date of 1 January 2025 is in place should there be any unforeseen delay (for example a delay in any building works);
- f) Any new site will be transferred to trustees prior to the School taking up occupation in the new site. Officers will need to negotiate and agree Heads of Terms setting out the main terms the parties agree in respect of the proposed transfer of Council owned land for any new site earmarked for the School to occupy.

Further confidential legal advice can be found in Appendix A.

### **The relocation of Islamia Primary School**

- 7.3 The legal implications associated with the Council's statutory duty to ensure that there are sufficient school places available to meet the needs of the local population were set out in the School Place Planning Strategy 2019-23.
- 7.4 There is a requirement to follow statutory processes for the relocation of the school in line with DfE Guidance on Prescribed Changes to Maintained Schools. The progression of the Council's capital programme will be dependent on approval of the relocation. There is a requirement to follow statutory processes in line with DfE Guidance on Opening and Closing Maintained Schools should a decision be taken not to retain the school.
- 7.5 The Council will be responsible for obtaining all necessary approvals to undertake the capital projects including planning approval, approval to development on playing fields (where appropriate) from DfE pursuant to Section 77 of the Schools Standards and Framework Act 1998 and building control approval. Where a proposed disposal is not authorised under a general consent the Secretary of State's consent may be needed and should be applied for.
- 7.6 This project will require the procurement of low, medium and high services and works contracts. All procurement will be conducted in accordance with Contract Standing Orders and the Public Contract Regulations 2015.
- 7.7 The Council currently owns the Strathcona site. Any non-council school utilising the site will need to enter into a lease or licence with the council to operate from the proposed site. The Heads of Terms between the Council and IPS should be agreed as soon as practicable.
- 7.8 Paragraph 11.8 of Part 3 of the Constitution makes it clear that nothing should prevent the Corporate Director, Finance and Resources from acquiring or disposing of freehold land or acquiring, granting or disposing of leasehold land (for any term of years) or from entering into licences and easements in respect

of land and buildings so long as doing so is (or would be) in accordance with the Academies Act 2010 or any other education legislation, regulation, order, direction, circular or guidance.

## **8.0 Equality Implications**

- 8.1 The council must in the exercise of its functions, have due regard to the need to:
- a) eliminate discrimination, harassment and victimisation
  - b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
  - c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it, pursuant to s149 Equality Act 2010. This is known as the Public Sector Equality Duty.
- 8.2 Under the Public Sector Equality Duty, 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 is connected to that characteristic.
- 8.3 The Public Sector Equality Duty covers the following nine protected characteristics: age, disability, marriage and civil partnership, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 8.4 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. The proposals set out in this report aim to ensure that there are sufficient and suitable school places for Brent children.
- 8.5 The Governing Board will be expected to undertake an equalities impact analysis as part of the formal relocation consultation process. Any concerns about the equality implications of this proposal would need to be considered during the informal and formal consultation processes.

## **9.0 Consultation with Ward Members and Stakeholders**

- 9.1 The Leader of the Council and the former Lead Member for Schools, Employment and Skills were briefed on developments on this project including the notices from the Yusuf Islam Foundation and capital project delivery options. The Lead Member for Children, Young People and Schools has been briefed on the project.
- 9.2 Officers met on 5 April 2022 with Preston Ward members and the Lead Member for Schools, Employment and Skills to discuss transport options for the Strathcona site with the intention of making school related journeys (i.e. school



drop off and pick up) car free. Officers met with Queens Park Ward members and the Lead Member for Children, Young People and Schools on 15 July 2022 to brief them on the proposed relocation of IPS.

- 9.3 Queens Park Ward and Preston Ward members will be kept informed as the project progresses and updated on project milestones such as the planning application submission, statutory consultation and any works on site.

#### **10.0 Human Resources/Property Implications (if appropriate)**

- 10.1 The Council currently owns the Strathcona site. Any non-council school utilising the site will need to enter into a lease with the council to operate from the proposed site as per paragraph 7.7 above.
- 10.2 The Strathcona site will be vacant from July 2022 and so the council will need to provide site security for approximately 12 months until the contractor took on the site to develop the new school buildings.

**Report sign off:**

***Nigel Chapman***

Corporate Director Children and Young People

***Minesh Patel***


Corporate Director Finance and Resources

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By virtue of paragraph(s) 5 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

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	<b>Cabinet</b> 12 September 2022
	<b>Report from the Corporate Director,  Governance</b>
<b>The Council's Workforce Strategy</b>	

<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	N/A
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>No. of Appendices:</b>	One  Appendix 1 - Draft Workforce Strategy 2022-25
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Martin Williams Head of HR <a href="mailto:martin.williams@brent.gov.uk">martin.williams@brent.gov.uk</a> 020 8937 3209

## 1. Purpose of the Report

- 1.1 To seek Cabinet approval of the proposed Brent Council Workforce Strategy for 2023 - 2025.

## 2 Recommendations

- 2.1 To consider, and if satisfied agree, the Workforce Strategy 2022-25
- 2.2 To agree the proposed governance arrangements in respect of oversight of the implementation of the strategy set out in paragraph 3.7.

## 3 Detail

- 3.1 In October 2017 Cabinet agreed the Council's Workforce Strategy for the period 2018-2020. This was a substantial document and committed the Council to a series of actions to ensure that its People Management performance was exemplary, delivering an organisation that put its workforce at the centre of its thinking. This was prior to the organisational review of the then Resources Directorate, which disaggregated the then HR function across three separate service areas. A subsequent review of the smaller HR service in 2018

reconfigured the service into a broadly operational function but shaped to deliver the outcomes of the Workforce Strategy, and the Apprenticeship Strategy that had been adopted at the same time.

- 3.2 In 2019 a Graduate Trainee undertook a project to review the performance of HR in delivering against the Workforce Strategy. The outcome was positive but served to demonstrate that although a substantial document the 2018-20 Workforce Strategy was repetitious in nature and unwieldy to work to.
- 3.3 The intention in the new proposed strategy is to provide a higher-level strategic document that does not seek to set out in advance a multitude of specific actions and targets over a number of years, but which has alongside it an action plan for each year of the strategy. This action plan will contain detailed actions and targets for the impending year and an outline of what is planned for each of the later years of the strategy. Progress in respect of the Strategy and the action plan will be reviewed at least annually, with more detailed actions and targets being developed for each year of the Strategy as it approaches.
- 3.4 The draft proposed Workforce Strategy is contained in Appendix 1 and is structured around the following four priority areas as set out below.
- Priority 1 – Workforce planning
  - Priority 2 – Workforce insight and experience
  - Priority 3 – Workforce growth and development
  - Priority 4 – Workforce ways of working

These have been developed in discussion with the officer Ways of Working Group and informed by the staff surveys undertaken during the pandemic. The draft also takes account of the developing Borough Plan that the Workforce Strategy will support, the Black Community Action Plan and the Equalities Strategy. The Workforce Strategy aims to ensure the council's workforce is shaped and enabled to achieve the council's objectives for its diverse communities.

- 3.5 Early in 2022 an audit of workforce and succession planning was undertaken. The outcome report made a number of recommendations, in particular that more structured governance arrangements to monitor implementation of the Workforce Strategy should be established.
- 3.6 The outcome of this audit also re-enforced the need for a more formalised approach to workforce planning (including succession planning) which had already been identified as one of the key priorities of the proposed workforce strategy.
- 3.7 It is proposed that the Council Management Team receive reports on progress in achieving the outcomes of the new Workforce Strategy twice a year, once before the start of the year to consider and agree the updated action plan for the remainder of the period of the strategy and once during each year to review progress on that year's actions, including the embedding of the Flexible Working policy. The actions for each year will be incorporated as appropriate

into HR's annual service plan and monitored at HR Management Team meetings. The Deputy Leader and Cabinet Member for Finance, Resources and Reform will also be regularly updated in respect of progress.

#### **4 Financial Implications**

- 4.1 The financial implications of implementing the workforce strategy can be contained within the existing the HR budget.

#### **5 Legal Implications**

- 5.1 Under section 149 of the Equality Act 2010, the council has a duty when exercising its functions to have 'due regard' to the need to eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act and advance equality of opportunity and foster good relations between persons who share a protected characteristic and persons who do not. This is the public sector equality duty. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 5.2 Due regard is the regard that is appropriate in all the circumstances. The weight to be attached to the effects is a matter for the council. As long as the council is properly aware of the effects and have taken them into account, the duty is discharged.

#### **6 Equality Implications**

- 6.1 We must ensure that any development and policies arising from this strategy provide opportunities for our whole diverse workforce, comply with our Equality Duty, are fully accessible and inclusive and do not unintentionally disadvantage underrepresented groups across the council.
- 6.2 It is not anticipated that the proposed workforce strategy will have any adverse equality implications. When identifying specific actions and developing interventions to implement the strategy, this will be carried out with due regard to our Public Sector Equality Duty. Equality Impact Assessments may be carried out depending on the nature and impact of proposed interventions.

**Report sign off:**

**Debra Norman**  
Corporate Director Governance

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## **Brent Workforce Strategy – 2022-25**

### ***Introduction***

Brent is one of the most culturally diverse boroughs in the UK. The council is a vibrant and dynamic organisation with a workforce that reflects the diversity of its community. The diversity of the borough and the cohesion between its different communities are major factors in Brent's characteristic vitality and energy. In Brent, 76% of the working age population (16-64) are economically active; 70% are employed. As an employer, we have an indisputable bearing on the economic development of the borough and an essential responsibility as a role model for other local employers. We are therefore pleased to introduce our workforce strategy.

Over the last few years the council has had to face unprecedented financial challenge and change. The pandemic has presented significant additional challenges and we are proud of the way our staff have adapted and responded during this difficult time. As we come out of the pandemic we need to respond to increased pressure on the services we offer both as a result of pent up demand and an increase in demand for other services such as mental health and employment support so that our residents are best placed to return to the lives they had before the pandemic. Brent has a clear vision to make the borough a great place to live and work even whilst this challenge continues; a place where people feel that they have opportunities to change their lives for the better even in the context of the most pressing financial challenges experienced in public services for decades.

A skilled and engaged workforce is crucial to achieving our vision. We are proud of our staff; we recognise the challenges and opportunities that lie ahead for our borough and it is only through our staff that these will be met. Our workforce strategy sets out our priorities for the next three years to enable and support our workforce in achieving our goals for the borough building on the commitment and flexibility demonstrated through the pandemic.

### ***Our workforce***

Having a high performing workforce that provides the best services it can which can truly understand and meet the needs of all our diverse communities is critical to the achievement of our goals for the borough. We strive to continue to be a fully accessible and inclusive organisation, to encourage the broad spectrum of skills, experiences and perspectives of our communities and our staff.

We aim to recruit, retain and reward a diverse, highly skilled, flexible and motivated workforce that leads the way in encouraging diversity to flourish in Brent.

Overall the diversity of workforce is closely aligned with the diversity of the communities we serve but we want to ensure this is the same at all levels of the organisation. We have made good progress over recent years but know we have more to do and will continue to build on existing practices and initiatives and identify new ones in pursuit of this aim. These initiatives will be informed through engagement with relevant staffing groups and our decisions will be evidence-based to ensure we

prioritise and focus our attention on those things that need to change that will really make a difference.

### ***Our workforce by equality group***

	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
No employees	2,119	2,138	2,365	2,371
Average age	44	44	44	45
Disability	10%	9%	9%	8%
Ethnicity - BAME	66%	65%	67%	66%
Gender - Female	64%	64%	64%	63%

### ***Our priorities***

We have identified 4 key workforce priorities which will guide both what we do and how we will do it in pursuit of achieving our goals for the borough.

This strategy document sets out the outcomes we will strive to achieve and the approach we will take to get there. This will be underpinned by a delivery plan that will set out in more detail what we will do and when we will do it by which will be regularly reviewed and updated throughout the period covered by this strategy.

#### ***Priority 1 – Workforce planning***

- We will work closely with and support services to identify current and future workforce requirements
- We will keep abreast of national, local and council developments to inform those requirements
- We will develop and implement plans to meet these requirements keeping them under regular review
- We will integrate succession planning into day-to-day management activity and ensure succession plans are in place for critical roles
- We will review and adapt our approach to recruitment and selection to ensure we attract the people with the right attributes to best serve our communities
- We will identify and tap into diverse talent pools both within and outside of the Council

#### ***Priority 2 – Workforce insight and experience***

- We will use our employees' experiences and views from pre-hire to retire so we can maximise all interactions to create a deep sense of belonging and wellbeing
- We will establish and draw upon multiple sources of data and information to provide intelligence
- We will build on our employee engagement action planning to ensure we are continuously improving as an employer

- We want everyone in our workforce to feel they can be who they are and feel confident in a supportive environment where they are able to contribute their ideas and opinions and work in partnership with others.
- We will provide managers with real time data to enable them to be pro-active in spotting emerging issues and deal with them effectively
- We will embrace the value of diversity through ideas, and ways of working that people from different backgrounds, experience and identity bring to the organisation
- We will continue to help staff access the benefits and well-being support available to them.
- We will make the council an employer of choice for a great diversity of people and prioritise achieving diversity at all levels in our workforce

### ***Priority 3 – Workforce growth and development***

- We will provide pathways into employment and opportunities to support career development and progression using innovative delivery mechanisms
- We will integrate learning and development into key people processes to embed a culture of learning and high performance
- We will ensure learning is accessible to all and available through a range of formal and informal mechanisms to recognise individual learning styles
- We will create a strong leadership pipeline, enabling the organisation to identify potential leaders early on and provide the right opportunities for development
- We will develop a set of management standards for managing staff, resources and budgets
- We will enable and require managers to be adept at supporting staff with development planning whilst at the same time encouraging staff to take personal responsibility for their own performance and development

### ***Priority 4 – Workforce ways of working***

- We will review our performance processes to ensure they focus on outcomes and are fit for purpose for a smaller more agile workforce
- We will maximise the use of technology and systems to make us more efficient and self-sufficient
- We will focus on activities that add value to make sure we make effective and efficient use of our resources
- We will embed flexible working to enable staff to achieve a healthy work-life balance whilst at the same ensuring services are delivered at a time and in a way that meets the needs of our customers
- We will focus our development activities on increasing leadership capability and capacity to lead staff through change whilst creating a culture of collaboration to help us create a more resilient workforce

## ***Outcomes***

Having a skilled and engaged workforce is crucial to achieving our vision. Therefore the priorities we have determined for our workforce are with the aim of achievement of the overall outcome of having and maintaining a skilled and engaged workforce.

We have identified a number of specific outcomes which we believe will contribute both collectively and individually to achievement of the overall outcome. These are:

- A greater proportion of filled positions
- Reduced reliance on agency workers and external providers
- Less reliance on external recruitment to fill key roles
- Increased staff retention
- Increased staff participation, engagement and satisfaction
- Increased flexibility to move staff to fill key skill gaps
- A workforce that is representative of the communities we serve; one which can truly understand and meet the needs of all our diverse communities

Specific actions and initiatives that will contribute to achieving the above outcomes will be outlined in a delivery plan for each year and will sit alongside the strategy. This will include targets for the impending year and an outline of what is planned for each of the subsequent years of the strategy.

## ***Progress reviews***

Achievement of the outcomes and the specific actions and initiatives for each priority will be kept under constant review to ensure they are delivering the outcomes identified.


Progress against the outcomes and the delivery plan, will be reviewed at least annually. It is anticipated that the overall outcome of a skilled and engaged workforce is relevant to achieving the Council's current and future vision, however the first of these reviews will be carried out once the Borough Plan for 2023-25 has been agreed by Cabinet.

Any changes to the priorities and specific actions and initiatives, including the identification of any new ones, will be underpinned by evidence based decision making.

It is proposed that the Council Management Team receive reports on progress in achieving the outcomes of the new Workforce Strategy twice a year, once before the start of the year to consider and agree the updated action plan for the remainder of the period of the strategy and once during each year to review progress on that year's

actions. The actions for each year will be incorporated as appropriate into HR's annual service plan and monitored at HR Management Team meetings.

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 <b>Brent</b>	<b>Cabinet</b> 12 September 2022
	<b>Report from the Corporate Director, Resident Services</b>
<b>Public Spaces Protection Order (PSPO) Nuisance Vehicles – Scope, Outcome of Consultation and Proposals for Implementation</b>	

<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>No. of Appendices:</b>	Five Appendix 1: PSPO Notice for Nuisance Vehicles Appendix 2: Vehicle Nuisance Data reports Appendix 3: CitizenLab PSPO Survey Data Appendix 4: CitizenLab PSPO Summary and Freeform Survey Data Appendix 5: Equality Impact Assessment
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Simon Egbor ASB Nuisance and Crime Manager 020 8937 5853 <a href="mailto:Simon.egbor@brent.gov.uk">Simon.egbor@brent.gov.uk</a>  Chris Whyte – Director of Environment and Leisure 020 8937 5342 <a href="mailto:chris.whyte@brent.gov.uk">chris.whyte@brent.gov.uk</a>

## 1.0 Purpose of the Report

- 1.1 Brent Council is committed to maintaining a clean and safe environment and it is the Council's responsibility to address a range of environmental quality issues, including anti-social behaviour (ASB).
- 1.2 The Anti-Social Behaviour, Crime and Policing Act 2014 sets out the tools and powers available for tackling ASB. Public Spaces Protection Order (PSPOs) are one of the tools available under the 2014 Act. These are wide-ranging and

flexible powers for local authorities, which recognise that councils are often best placed to identify the broad and cumulative impact that ASB can have on communities. The Act gives councils the authority to implement PSPOs in response to the particular issues affecting their communities, provided certain criteria and legal tests are met. A breach of a PSPO without a reasonable excuse is an offence. This gives councils the ability to enforce with Fixed Penalty Notices (FPN's) or court action any behaviour causing nuisance, alarm, harassment or distress to those who live, work or visit an area.

The council has effectively utilised PSPO powers in order to control street drinking since 2017, including powers implemented to support enforcement work around Wembley Stadium primarily on event days. The powers are a critical complementary tool to those provided to the police and other agencies to tackle ASB in Brent.

- 1.3 Over the past 18 months the council has seen an increase in complaints related to nuisance vehicles on pedestrian footways and the use of private use e-scooters. This has precipitated consideration of the powers currently available to police and the council to address the issues that these vehicles cause
- 1.4 This report sets out the rationale for adopting a borough-wide PSPO in relation to nuisance vehicles and use of private e-scooters. It also outlines the outcomes of a recent consultation process that supports the creation of a PSPO and suggests the scope of the order and process for implementation.

## **2.0 Recommendation(s)**

### **2.1 Cabinet is asked to:**

- a) Note the rationale for the proposed implementation of a Public Spaces Protection Order (PSPO) for Nuisance Vehicles and private e-scooters as set out in the report.
- b) Note the outcome of the recent consultation process, indicating significant support for its creation.
- c) Review and provide comments on the scope of the proposed PSPO as set out in Appendix 1 to this report.
- d) Give authority to the Operational Director for Regeneration & Environment to set the date on which the PSPO will become effective and in force.

## **3.0 Detail**

- 3.1 Under Section 59 of the Anti-Social Behaviour Crime and Policing Act 2014 (the Act) a Public Spaces Protection Order (PSPO) may be made by the council after consultation with the Police, Mayor's Office for Policing and Crime, and any other relevant bodies, groups or individuals (such as community leaders or users of a particular area/facility). The PSPO places restrictions and/or requirements on people using the area defined by the Order. These can be blanket restrictions or targeted at particular groups (such as street drinkers), or



apply only at certain times. Breach of a PSPO is a criminal offence and can lead to a fixed penalty notice of £100 or a maximum fine of £1000.

- 3.2 In recent years and particularly during the past 18 months, a significant increase in complaints related to nuisance vehicles has occurred within the borough. In addition, the increased use of e-scooters has resulted in the requirement to review the powers available in respect of this relatively new form of transport in order to ensure that they are used appropriately and legally. As a result, the council is considering the implementation of a PSPO that will address the following issues;

- (A) Revving of Engine(s) as to cause a public nuisance
- (B) Repeated Sudden and rapid acceleration (as a public nuisance),
- (C) Racing
- (D) Performing stunts (as to cause a public nuisance)
- (E) Without lawful authority or reasonable excuse wilfully causing obstruction on a public highway, whether moving or stationary, including driving in a convoy
- (F) Vehicles driving over Footways, Footpaths and Verges without reasonable or lawful excuse (Illegal Crossovers)
- (G) Unauthorised use of a privately owned Electric scooter (e-scooter) on the public highway within the London Borough of Brent. (Excluding e-scooters under any London approved rental trial scheme). – (Prohibition Withdrawn reference 7.13)

The sections below provide more information regarding the basis and justification for the use of PSPO for the purposes set out above:

### **Nuisance Vehicles**

- (A) Revving of Engine(s) as to cause a public nuisance
- (B) Repeated Sudden and rapid acceleration (as a public nuisance),
- (C) Racing
- (D) Performing stunts (to cause a public nuisance)
- (E) Without lawful authority or reasonable excuse wilfully causing obstruction on a public highway, whether moving or stationary, including driving in a convoy

- 3.3 In recent years, the Council has experienced a significant increase in incidents captured on CCTV, relating to street racing, driving in a dangerous way and vehicles causing excessive noise on our highway. These activities have resulted in a number of accidents and indeed tragically, a fatality relating to this inappropriate use.
- 3.4 The past 18 months in particular has seen a large increase in anti-social behaviour calls related to the use of vehicles in comparison to previous years. For example, data gathered between the months of June 2020-June 2021 identifies 798 calls linked to vehicle nuisance reported to the Police. Reports range from racing, driving in a convoy, performing wheel spins and anti-social

driving across the borough. A breakdown of this data is provided in Appendix 2.

- 3.5 The Police are increasingly using their powers conferred in Section 59 of the Police and Reform Act 2002 to address the issue in the form of careless or inconsiderate driving. These powers allow an officer to seize and remove a vehicle that he or she believes is being driven inconsiderately or carelessly and is causing, or is likely to cause, alarm, distress or annoyance to members of the public. However, the police cannot seize a vehicle under this provision without first warning the driver that the vehicle will be seized if the driving persists. There are also practical challenges to seizure of vehicles, as Police will have to plan additional resources to do this, which isn't always available.
- 3.6 Bringing in a PSPO to address this nuisance behaviour will ensure Brent residents and interested stakeholders are given reasonable information around the problem profile and the nuisance impact to the Council. Intelligence over the years has identified hotspot areas where this behaviour is most prevalent with a notable increase in activity over the spring and summer months. Deployment of mobile CCTV cameras will be undertaken in these hot spot areas to monitor activity, which will inform joint police and council operations based on intelligence gathered. The implementation of the Borough-wide Street Drinking PSPO has informed how joint targeted policing can work more effectively and we plan to utilise and enhance existing arrangements.
- 3.7 Partner operations will also be planned at the council's weekly tasking meeting with the police to respond to any emerging hotspots. The PSPO will also provide improved powers to the police to intervene in a more timely and effective manner.
- 3.8 Officers are currently discussing with Kensington and Chelsea counterparts who operate a similar PSPO and primarily use acoustic cameras to monitor nuisance vehicles and issue FPN's by post. The Council will seek to establish arrangements with DVLA in order to obtain registered keeper details for nuisance vehicles under the ASB Crime and Policing Act 2014 so that the ability to enforce is maximised. Once in place there is also scope to use existing parking lane watch cameras in Brent to monitor and enforce this activity.

### **Driving Over the Footway**

- 3.9 This year has also seen an increase in complaints regarding vehicles driving over footways, footpaths and verges throughout the Borough. The detrimental impact of this activity is potential danger to pedestrians and damage to the verges and open spaces, which not only spoils the appearance of the street, but also involves the council in unnecessary additional expense in making good the damage. The phenomenon of delivery drivers on scooters riding onto the footway has proven to be an issue of significant concern for the public and an activity against which it is presently difficult to enforce.
- 3.10 Under s184 Highways Act 1980, a person who knowingly uses a footway or verge as an unlawful crossing is guilty of an offence and liable to a fine not

exceeding £20 or, in the case of a second or subsequent offence, to a fine not exceeding £50. Currently, an officer could inspect a location up to 6 times to ensure compliance under the Highways Act. If the PSPO is implemented these inspections will be reduced significantly, as the onus will be on the owner of the property to appeal/challenge the issue of a FPN by proving that the breach did not occur. Therefore, introduction of a PSPO in relation to driving over footways provides officers with a far more straightforward approach to ensuring verges, open spaces, footpaths and footways are not damaged and any nuisance behaviour because this activity is enforced against.

- 3.11 The PSPO will ensure businesses; residents and members of the public are made aware on the damage caused to surfaces and the financial impact to the council. Council officers will enforce this in accordance with Brent's Enforcement Policy where there will be a process of engagement in the first instance, before any FPN is issued and similar to all FPNs issued, a public interest test would be applied before any prosecution is considered.

### **Use of E-Scooters**

- 3.12 Using an e-scooter on private land is legal but for public use, e-scooters are classed as powered transporters, which means that the same laws that govern the use of cars and other motor vehicles apply. That means it is illegal to ride them on pavements, footpaths, cycle lanes and in pedestrianised zones. To be ridden on public roads they need to conform to the same rules as cars, including the display of licence plates, indicators, rear lights and insurance. The only exception to these laws is the government-approved trials being carried out in 32 cities around the UK.
- 3.13 E-scooters hired through these schemes can be ridden on roads and cycle paths and are insured by the operators. The scooters are limited to 15.5mph, with lower limits imposed in some areas via geofencing. E -scooters on a London approved trial scheme will be exempt from the prohibitions within the PSPO.
- 3.14 A PSPO will also provide the council with new legal powers to enforce against this behaviour. It will allow for better consistency in policing this issue in partnership with our Police colleagues, through a consistent application of engagement and education alongside fixed penalty notices in accordance with Brent Enforcement Policy, for those in breach. The police currently do not have the resource capacity to routinely fine and seize e-scooters being used illegally with greater priority given to tackle acquisitive and violent crime. However, a joined up enforcement approach with the council under the PSPO will increase that resource capacity.
- 3.15 As part of the process of implementing the PSPO, we will ensure residents, businesses and members of the public are informed and educated on the legal guidance around e-scooters, and the council's enforcement scope under the PSPO to safeguard residents and commuters who live and visit the borough.

- 3.16 In addition the Council will continually keep informed on any changing legislation around the use of E-Scooters on the public highway and it will be important that the Council engage users over the next 12 months, raising awareness and educating on the lawful, appropriate and safe use in Brent as part of its enforcement approach. There are also opportunities for the Council to review the merits of a trial scheme in Brent, enhancing more sustainable modes of travel.

#### **4.0 Financial Implications**

- 4.1 The approximate cost of affixing the notices across the borough will be £7-10,000 and will be met from existing budgets within Regeneration & Environment. There is potential to generate some income from fines and prosecutions but there is no baseline to project this annually at this stage.

#### **5.0 Legal Implications**

- 5.1 Under section 59 of the Anti-Social Behaviour, Crime and Policing Act 2014 (the Act), a local authority may make a PSPO in the areas where a particular nuisance or problem occurs which is detrimental to local community's quality of life. In order to issue a PSPO, the council must be satisfied on reasonable grounds that the two statutory conditions set out in s59 (2) and s59 (3) are met and that the restrictions are reasonable and proportionate.

- 5.2 Section 59 (2) of the 2014 Act states that the first condition is that:

- (a) activities carried on in a public place within the authority's area have had a detrimental effect on the quality of life of those in the locality, or
- (b) It is likely that activities will be carried on in a public place within that area and that they will have such an effect.

- 5.3 Section 59(3) of the 2014 Act states that the second condition is that the effect, or likely effect, of the activities -

- (a) Is, or is likely to be, of a persistent or continuing nature,
- (b) Is, or is likely to be, such as to make the activities unreasonable, and
- (c) Justifies the restrictions imposed by the notice.

- 5.4 Section 59(5) of the 2014 Act provides that the only prohibitions or requirements that may be imposed are ones that are reasonable for the specified objectives of the PSPO that are:

- (a) to prevent the "detrimental effect" referred to in section 59(2) of the 2014 Act from continuing, occurring or recurring; or
- (b) to reduce that detrimental effect or to reduce the risk of its continuance, occurrence or recurrence.

- 5.5 The Home Office statutory guidance for frontline professionals (The Home Office Guidance) (pg. 48) states; “these orders can restrict what people can do and how they behave in public spaces. It is important that the restrictions imposed are focussed on specific behaviours and are proportionate to the detrimental effect that the behaviour is causing or can cause, and are necessary to prevent it from continuing, occurring or recurring”.
- 5.6 Before deciding to make the PSPO, the council must comply with certain statutory requirements relating to publication, consultation, notification and information in respect of the proposed PSPO in the relevant areas. In addition, the council will need to evidence that it has given regard to statutory guidance issued by the Secretary of State. Given the number and type of restrictions proposed, the following consideration points are brought to the attention of Cabinet;
- a) the term “detrimental effect” is not defined by statute. The term has been considered by case law and the current position is that local authorities have been given a wide discretion to decide what behaviours are troublesome and require to be addressed within their local area. This requires local knowledge, taking into account conditions on the ground, exercising judgement; (i) about what activities need to be covered by a PSPO and (ii) what prohibitions or restrictions are appropriate for inclusion in the order. There may be strong feelings locally about whether any particular activity does or does not have a detrimental effect. In such cases a local authority will need to weigh up competing interests. The behaviours which PSPOs are intended to target are those which are seriously anti-social, not ones that are simply annoying”.
  - b) Cabinet is asked to note that when considering its decision, it should look at each specific restriction (A-G) to be contained within the PSPO and the practical issues and implications that each raises.
  - c) The Local Government Association (LGA) paper entitled “Public Spaces Protection Order, Guidance for Councils” (pg. 15), although non-statutory guidance, states, “Councillors ...have an important role in examining the processes used in drafting the proposal. This will include analysing the outcomes of the consultation process and other supporting evidence offered to satisfy the statutory criteria, and determining whether, on balance this provides sufficient grounds to proceed”. The LGA guidance is not mandatory and local authorities are not legally obliged to follow advice from the LGA. However, the LGA provides useful advice to local authorities on areas of best practice in relation to the exercise of various local authority functions.
- 5.7 PSPOs, or their variation, may be challenged within six weeks of being made by way of an application to the High Court. The Court may suspend the operation of the PSPO or any of the prohibitions imposed by it until the determination of the proceedings. Should the Court be satisfied the council erred and the applicant has been substantially prejudiced by that failure, it may quash the Order or any of the prohibitions imposed by it.

- 5.8 Breach of a PSPO is a criminal offence, subject to a fixed penalty notice (of up to £100) or prosecution and a fine of up to £1,000 (Level 3 of the Standard Scale).
- 5.9 The decision notice for the Cabinet meeting of 14 April 2015 regarding the delegation of functions in the exercise of powers under the 2014 Act, which covers PSPOs, confirms “delegated authority to the Chief Operating Officer in consultation with the Lead Member for stronger communities for the function of making Public Spaces Protection Orders under the 2014 Act”.
- 5.10 The post of Chief Operating Officer has been deleted and the relevant functions transferred to the Corporate Director Resident Services. The relevant Cabinet Member is now the Member for Safer Communities and Public Protection.
- 5.11 Once approved, the PSPO must be published on the council website and notices erected publicising the fact that the PSPO has been made and its effect.
- 5.12 When considering the Human Rights Act the council must balance the rights and freedoms of individuals, in relation to the proposed restrictions imposed, against the needs of the wider community.
- 5.13 Article 10 of ECHR (Freedom of Expression) states the following:
1. Everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers. This Article shall not prevent States from requiring the licensing of broadcasting, television or cinema enterprises.
  2. The exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society, in the interests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals, for the protection of the reputation or rights of others, for preventing the disclosure of information received in confidence, or for maintaining the authority and impartiality of the judiciary.
- 5.14 Article 11 of ECHR (Freedom of assembly and association) states the following:
1. Everyone has the right to freedom of peaceful assembly and to freedom of association with others, including the right to form and to join trade unions for the protection of his interests.
  2. No restrictions shall be placed on the exercise of these rights other than such as are prescribed by law and are necessary in a democratic society in the interests of national security or public safety, for the prevention of disorder or crime, for the protection of health or morals or for the protection of the rights and freedoms of others. This Article shall not prevent the

imposition of lawful restrictions on the exercise of these rights by members of the armed forces, of the police or of the administration of the State.

## **6.0 Equality 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:

- a) the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act,
- b) to advance equality of opportunity and
- c) 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 Consideration must also be given as to how the proposals contained within this report might impact adversely on those persons with protected characteristics as set out in the Equalities Act 2010 and whether there should be any mitigated actions proposed in relation to any potential adverse impacts of such proposals.

6.3 The implementation and policing of a PSPO must be in accordance with the Equality Act 2010. There will be no discriminatory policing of this order in line with our Public Sector Equality duty.

6.4 An Equality Impact Assessment has been undertaken and is attached at Appendix 5.

## **7.0 Consultation with Ward Members and Stakeholders**

7.1 In accordance with legislative requirements, a six-week consultation process relating to the potential use of a PSPO for such purposes took place between 8 November and 20 December 2021. The details of the consultation were published on the council’s website in accordance with the legal guidance under the Anti-Social Behaviour, Crime and Policing Act 2014. The consultation was shared through the council’s Citizens Hub Portal.

7.2 The consultation questionnaires were sent directly to all Local Councillors in Brent, the Brent Safer Neighbourhood Board and shared with all Brent Safer Neighbourhood Police Teams to raise awareness in all respective wards. The Parks Service also raised awareness around the consultation exercise with various park user groups and encouraging active participation in this process.

7.3 The Safer Neighbourhood Cluster Police Inspector for Brent and all Community Safety statutory partners at the Brent Joint Action Group were consulted and endorsed the scope of the PSPO proposed by the council.

- 7.4 Brent's communication team utilised twitter and Facebook to raise awareness on the public consultation. The Consultation was published in the Brent Kilburn Times and sent to all Borough contacts through the Online Watch Link (OWL).

### **Consultation outcome**

- 7.5 126 respondents participated in the consultation to introduce the PSPO. Over 85 % of all responses strongly agreed or agreed with all prohibitions consulted on while under 5% of all responses strongly disagreed or disagreed with the proposals for nuisance vehicles, with 8% disagreeing or strongly disagreeing with the proposed measures in relation to e-scooters. A full breakdown of data is provided in Appendices 3 and 4.
- 7.6 The blue line in each graph on page 3 of Appendix 3 shows the distribution of the Brent population as a whole, which conveys how representative respondents were in respect of age, ethnicity, religion, gender, disability, sexual orientation and gender identity. Older age groups are massively overrepresented in taking part in the consultation. Residents aged 45+ make up about two thirds of respondents (70/104, 67.5%). Over 35% of respondents were White, 15% Asian and 9% Black. 14% of respondents identified as having a disability and over 3% identified as being Lesbian, Gay or Bisexual. Over 45% of respondents identified as Christian, 18% other and just over 5% Muslim and Hindu.
- 7.7 The most responses came from Dollis Hill, Mapesbury and Northwick Park, and the least from Alperton, Fryent, Kenton, Kilburn & Queensbury. The charts in page 4 of Appendix 3 also show where responses are in a ward with a high level of deprivation or digital exclusion (where one is the highest level).

### **Comments**

- 7.8 The majority of respondents submitted supportive comments around the potential introduction of the PSPO and expressed a view that it would help tackle dangerous driving and illegal crossovers that are experiencing a year on year increase. Others felt that the introduction of the PSPO would also help police, and reduce illicit drug activity that is alleged to be perpetrated using e-scooters.
- 7.9 Some respondents felt that e-scooters reduce car journeys and is part of the wider government strategy for new sustainable ways of travelling. However, those who lawfully use e-scooters and are part of an approved trial scheme would not in breach of the proposed order. Brent is not currently running a trial scheme for e-scooters but more sustainable ways of travelling is a Borough priority and a 12 month review will be conducted on the prohibition of e-scooters in order to ensure that use as a sustainable form of travel are not being negatively impacted.
- 7.10 Respondents who identified as disabled felt that they were impacted by illegal use of e-scooters on pavements and felt there should be prior dialogue with businesses before the implementation of the PSPO.



- 7.11 Direct representation was made by the Brent Cycling Campaign who were concerned that cyclists mounting or riding on the pavement for practical purpose would fall within the parameters of the proposed PSPO. However, this would fall outside the scope of enforcement, as that would be classed as a reasonable and lawful excuse, with a nuisance test always applied by the enforcement officer.
- 7.12 A full break down of all comments received is provided in Appendix 4. Based upon the outcome of the consultation process, it is recommended that the proposed PSPO be implemented.

## **8.0 Scope and Implementation Timeline**

- 8.1 It is proposed that the PSPO will be implemented in early 2023 or any foreseeable date before that subject to Cabinet approval. It is proposed that the commencement date upon which the PSPO will become effective will be set by the Corporate Director, Resident Services. Relevant PSPO signage will be affixed across Brent, informing the public of the prohibitions in place.
- 8.2 As outlined in 3.15 a communications exercise and awareness raising with residents and businesses will also be undertaken across the borough to outline the Brent enforcement policy. Enforcement will be data driven and targeted in hotspot areas as outlined in the report. Use of surveillance assets to monitor nuisance vehicles, (mirroring the Kensington and Chelsea model) will be an integral approach going forward.

### **Report sign off:**

**Peter Gadsdon,**  
Corporate Director, Resident Services

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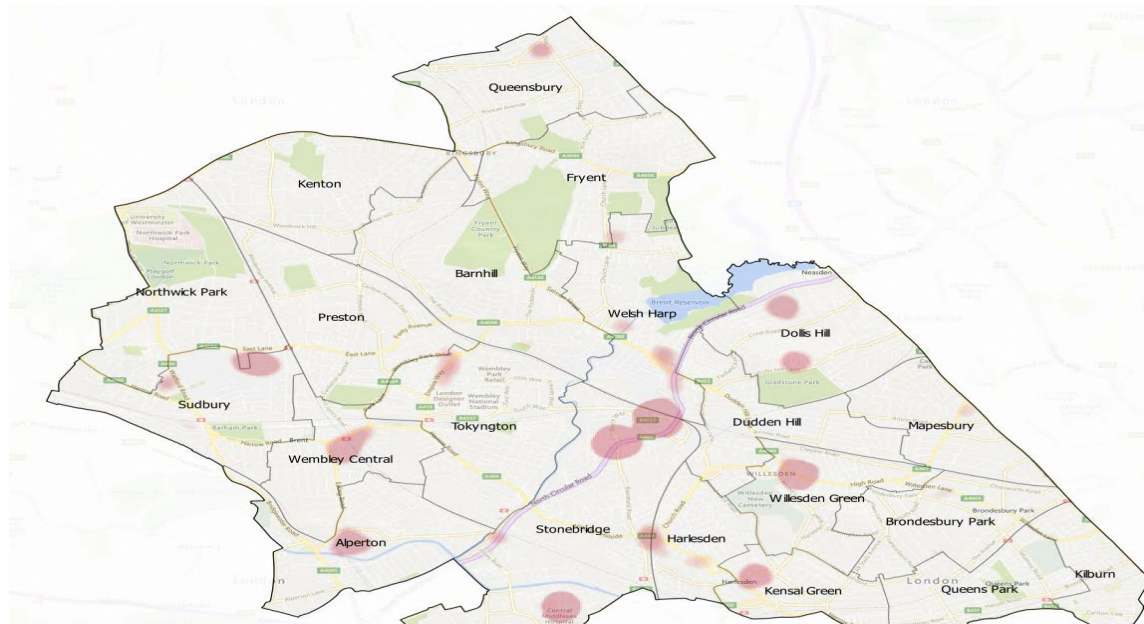


ANTI-SOCIAL CRIME AND POLICING ACT 2014  
Section 59

**Public Spaces Protection Order Nuisance Vehicles and E Scooters**

The London Borough of Brent, in exercise of its powers under section 59 of the Anti-Social Behaviour, Crime and Policing Act 2014, will be implementing for a duration of 2 years a Public Spaces Protection Order (PSPO), identifying a Restricted Area (outlined on the map below) where the activities listed under PROHIBITIONS are prohibited and where a Police Officer, Police Community Support Officer (where accredited) or Authorised Council Officers have the power to require persons undertaking any of the restricted actions to cease forthwith.

**Restricted Area: LONDON BOROUGH OF BRENT**



I, \_\_\_\_\_ Strategic Director for Regeneration and Environmental Services of the London Borough of Brent, with the consent of the Lead member for Community Safety of the London Borough of Brent, authorise Brent Officers and uniformed Constables to enforce the order as defined under section 59 Anti-Social Behaviour, Crime and Policing Act 2014.

**Relevant Period**

From (time)	<b>0001</b>	hrs (24 hour clock) on		(year)	<b>2022</b>
To (time)	<b>2359</b>	hrs (24 hour clock) on		(year)	

**Prohibitions:**

Within the area described, the following are prohibited:-

- A) Revving of Engine(s) or use of horns as to cause a public nuisance;
- B) Repeated sudden and rapid acceleration (as a public nuisance);
- C) Racing;
- D) Performing stunts (as to cause a public nuisance);
- E) Without lawful authority or reasonable excuse wilfully causing obstruction on a public highway, whether moving or stationary, including driving in a convoy;
- F) Any vehicle driving over Footways, Footpaths and Verges without reasonable or lawful excuse.

This prohibition applies to any area within London Borough of Brent, footway, footpath or grass verge maintainable at the public expense or managed by the Local Authority and which is adjacent to the carriageway or footway of a highway, including adjoining footpaths.

Vehicle "includes a moped, E-scooter, pedal cycle, which includes a power assisted pedal cycle or a pedal cycle in combination with a trailer, constructed or adapted for carrying one or more passengers.

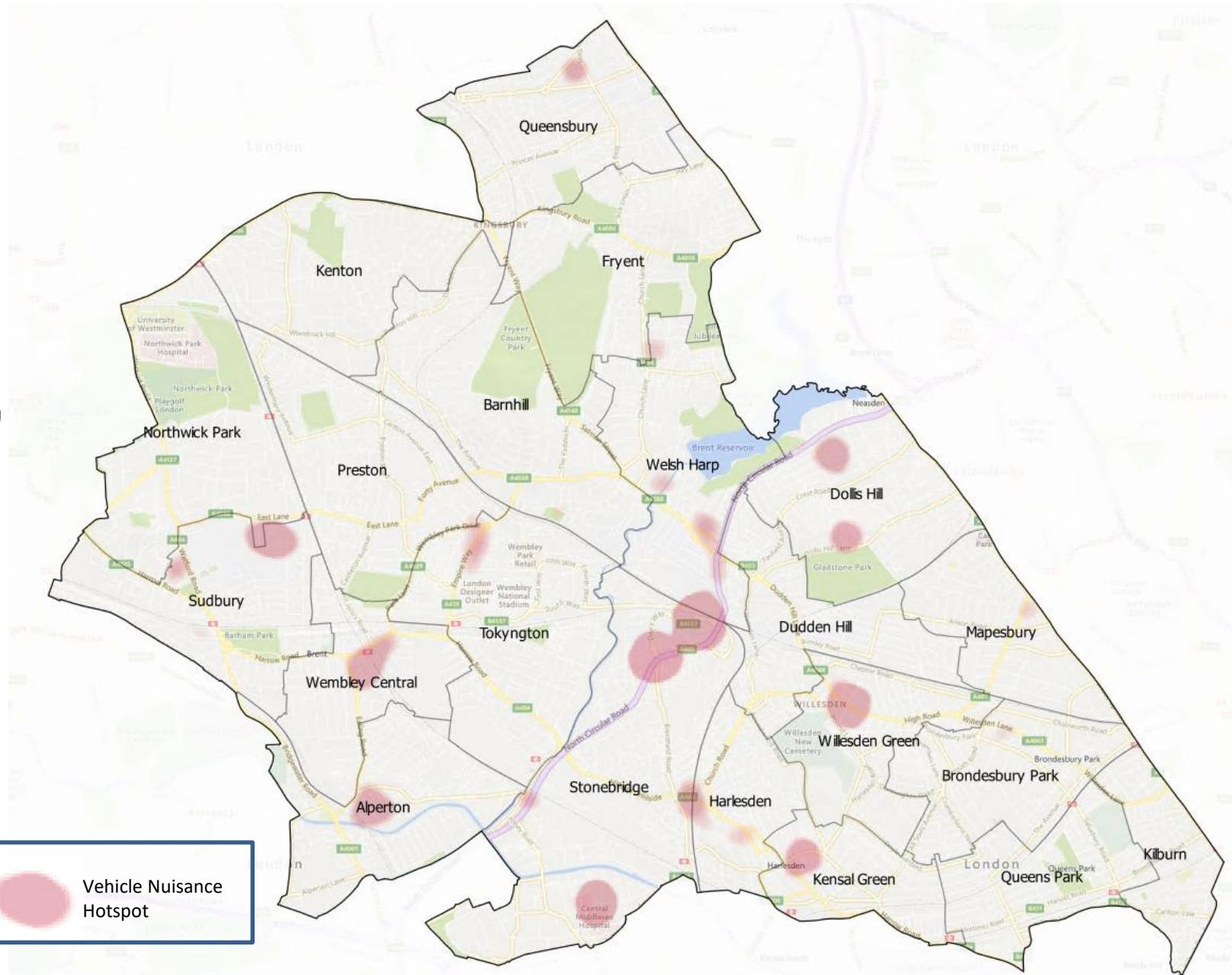
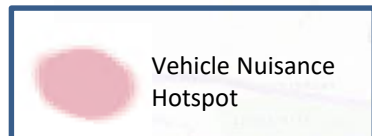
**BREACH OF A PSPO**

Failure to comply with PSPO prohibitions is a criminal offence subject to up to a level 3 fine on prosecution (up to £1000). A breach of a PSPO could result in the issuing of a Fixed Penalty Notice (£100), payable within 14 days.

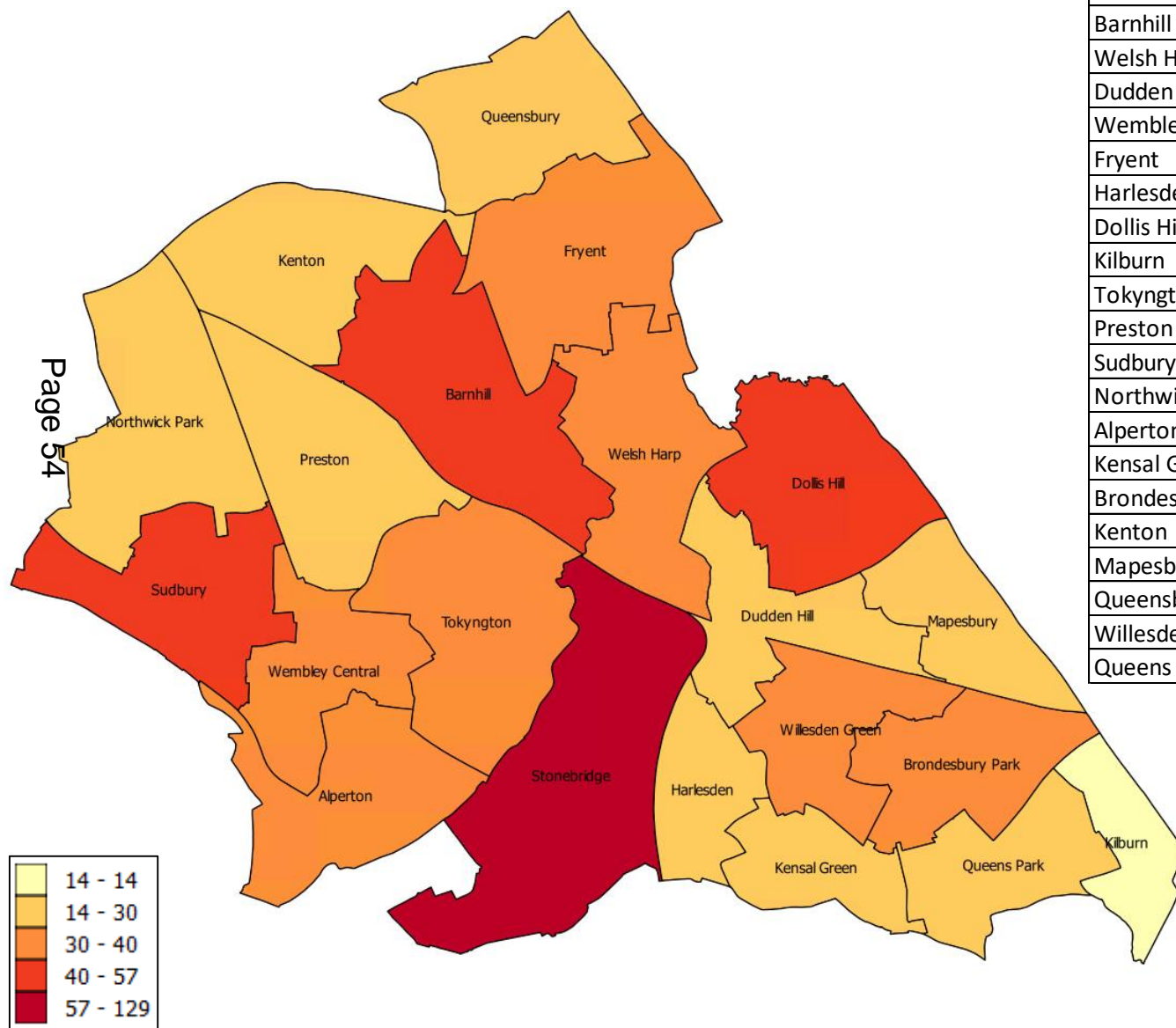
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# VEHICLE NUISANCE REPORTS TO POLICE – 18/06/2020 to 17/06/2021

Page 53



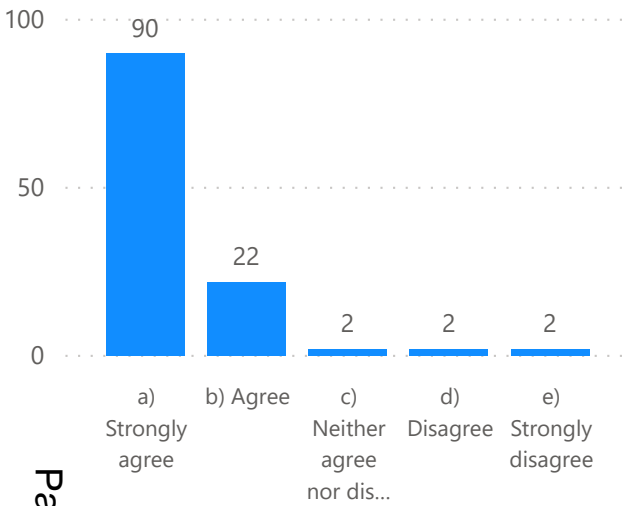
# VEHICLE NUISANCE REPORTS TO POLICE BY WARD – 18/06/2020 to 17/06/2021



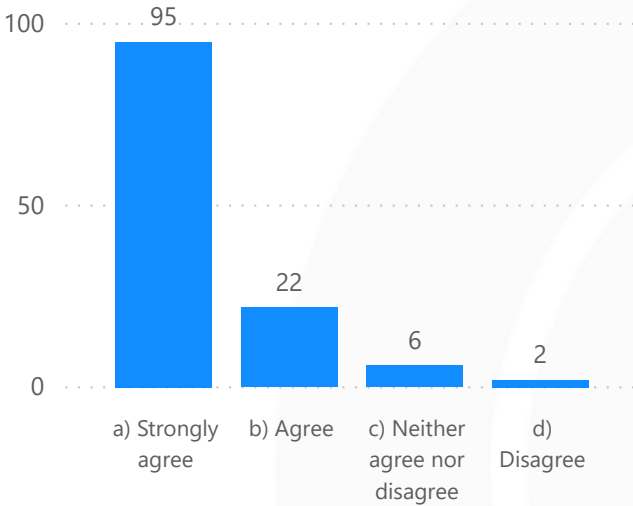
Ward	Vehicle Nuisance Reports
Stonebridge	129
Barnhill	46
Welsh Harp	40
Dudden Hill	30
Wembley Central	38
Fryent	36
Harlesden	27
Dollis Hill	57
Kilburn	14
Tokyngton	40
Preston	29
Sudbury	46
Northwick Park	22
Alpertown	34
Kensal Green	30
Brondesbury Park	34
Kelson	26
Mapesbury	27
Queensbury	30
Willessden Green	38
Queens Park	25

# CitizenLab - Public Space Protection Order Survey

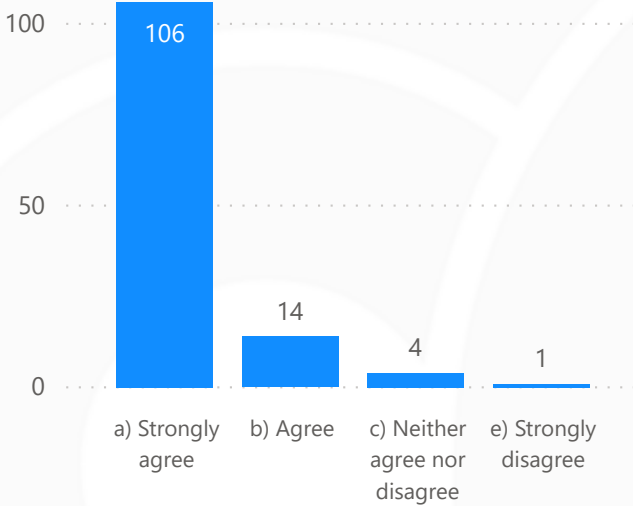
PSPO - Revving/horn use



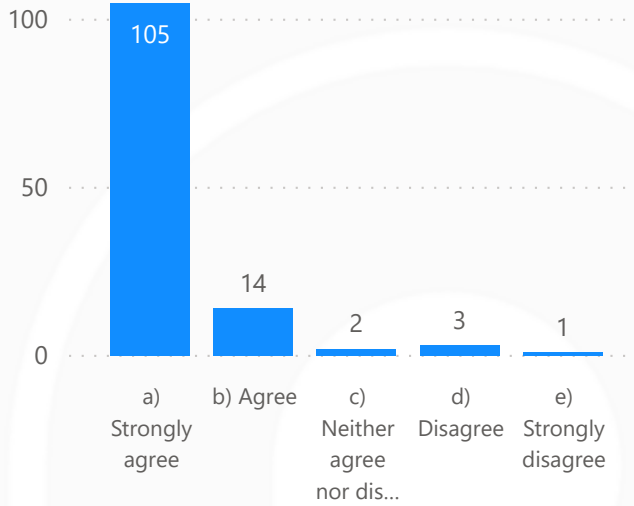
PSPO - Rapid & sudden acceleration



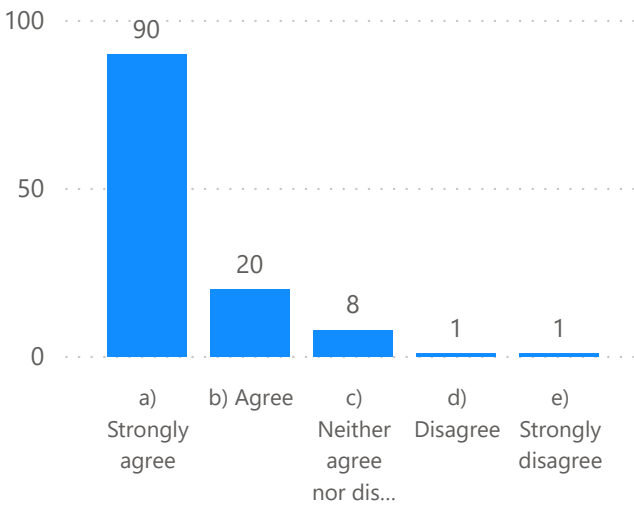
PSPO - Racing



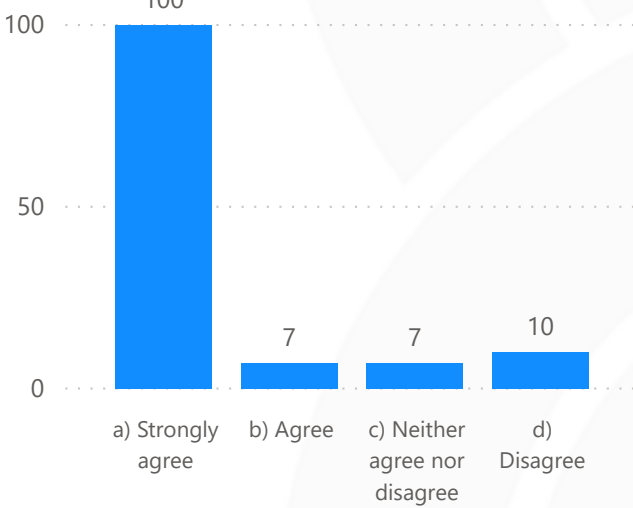
PSPO - Stunts



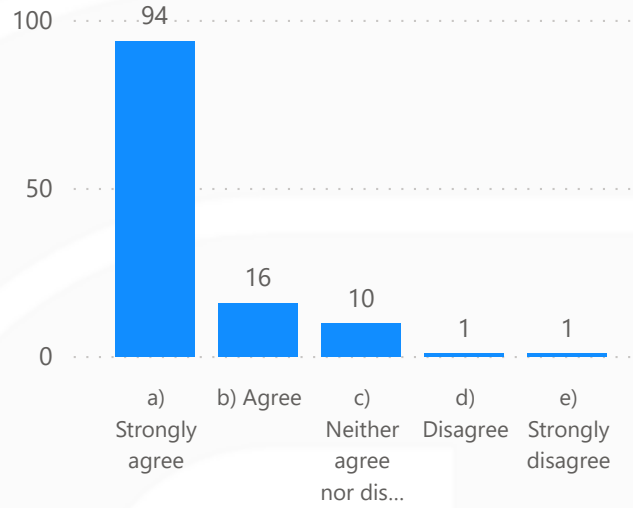
PSPO - Obstruction



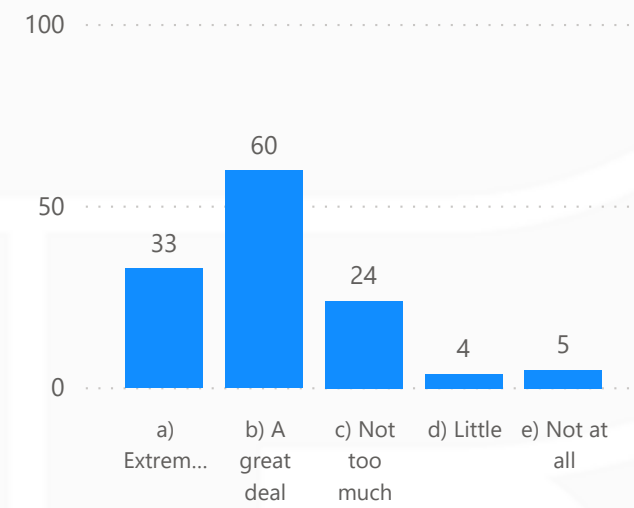
PSPO - E Scooters



PSPO - Driving over footpaths



Imapct



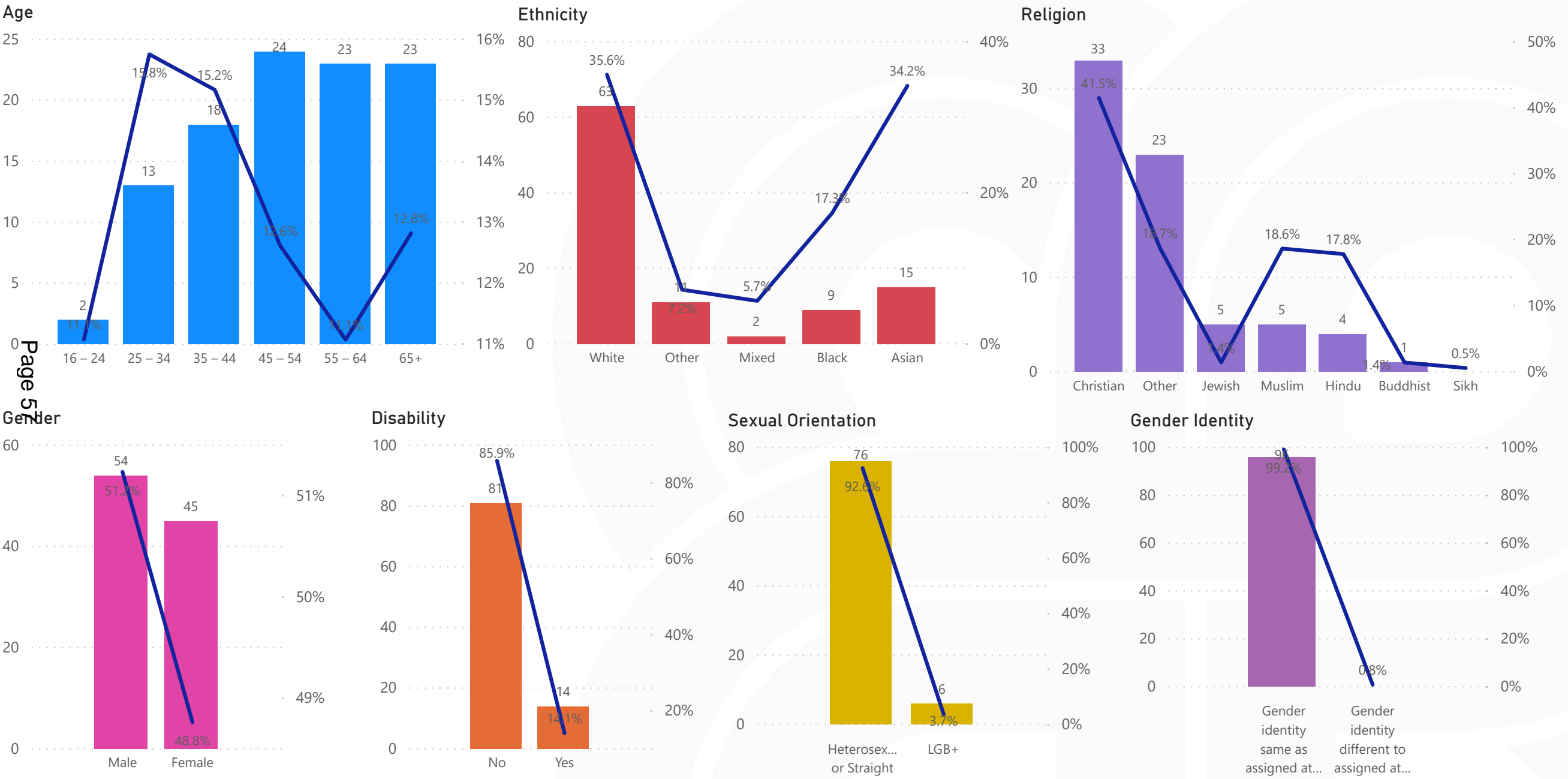


### Key Words





# CitizenLab - Public Space Protection Order Survey



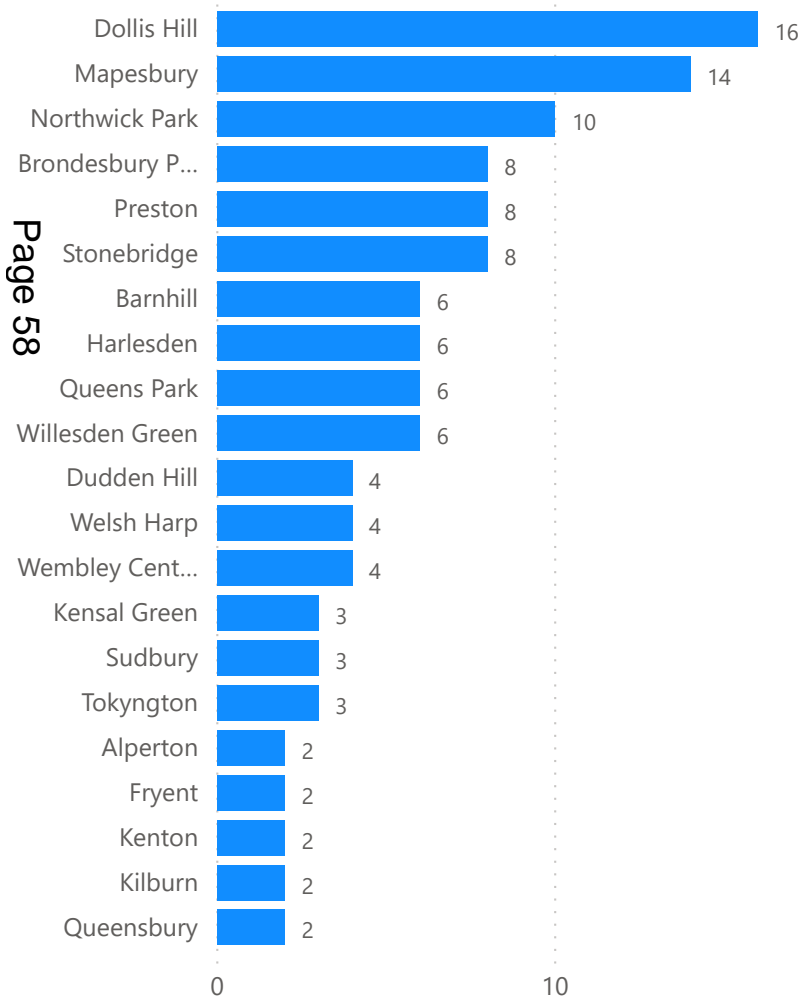
The blue line on each graph shows the percentage of Brent's overall population that shares this characteristic.

CitizenLab - Public Space Protection Order Survey

126

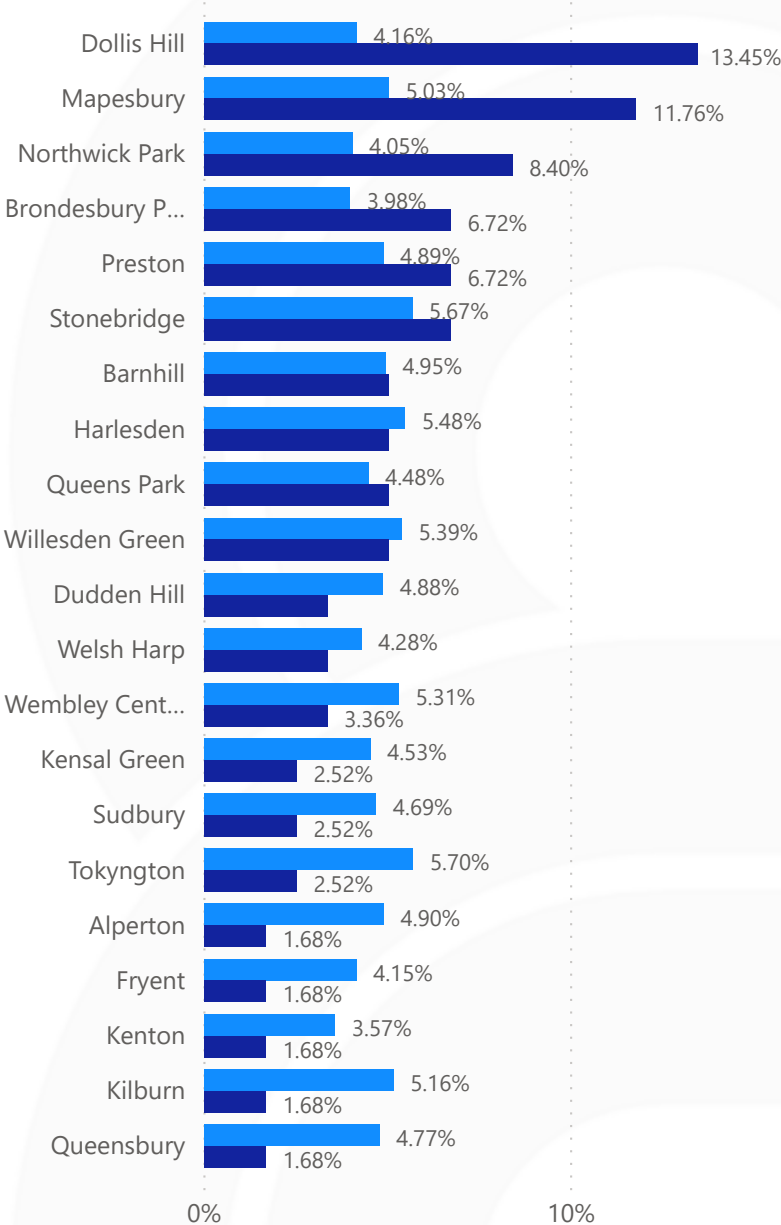
Total responses

Responses by ward

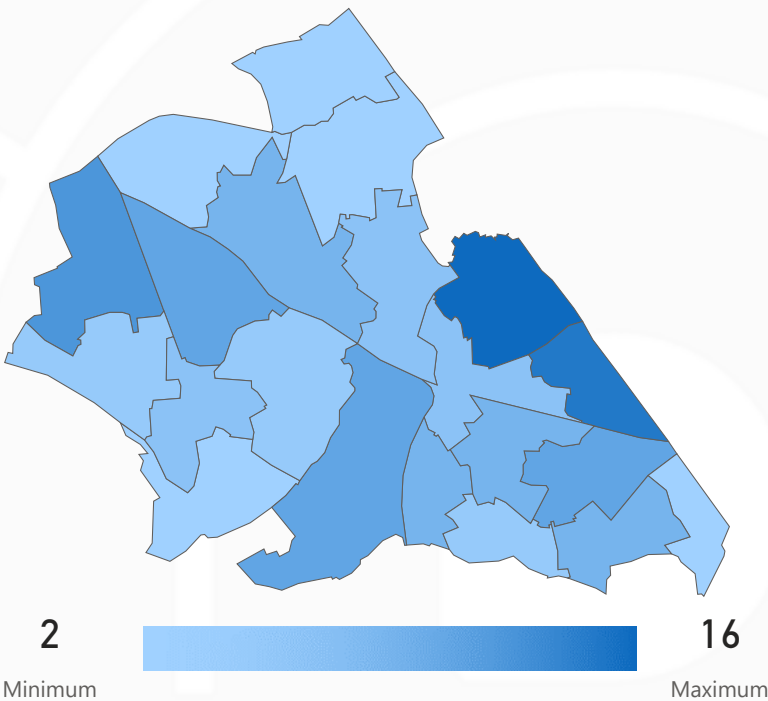


Responses by ward

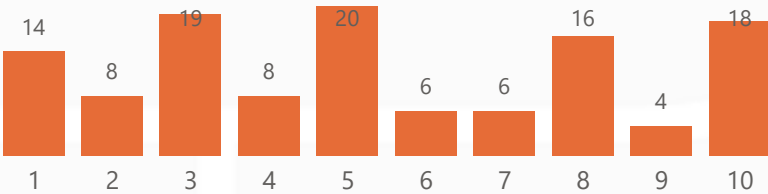
Population in ward Min of WardPercentage



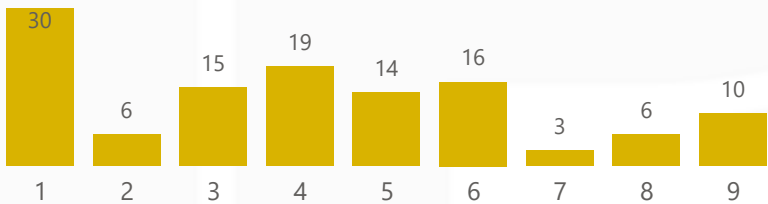
Responses by ward



Responses by Brent deprivation decile



Responses by London digital exclusion decile



ID	Question	Strongly Agree & Agree	Disagree & Strongly Disagree
1	To what extent do you agree that a Public Spaces Protection Order should be introduced in the London Borough of Brent to tackle any vehicle driving over Footways, Footpaths and Verges without reasonable or lawful excuse?	90%	2%
2	To what extent do you agree that a Public Spaces Protection Order should be introduced in the London Borough of Brent to tackle performing stunts (as to cause a public nuisance)?	95%	3%
3	To what extent do you agree that a Public Spaces Protection Order should be introduced in the London Borough of Brent to tackle racing?	96%	1%
4	To what extent do you agree that a Public Spaces Protection Order should be introduced in the London Borough of Brent to tackle Repeated sudden and rapid acceleration as a public nuisance?	94%	2%
5	To what extent do you agree that a Public Spaces Protection Order should be introduced in the London Borough of Brent to tackle revving of engine(s) or use of horns as to cause a public nuisance?	95%	3%
6	To what extent do you agree that a Public Spaces Protection Order should be introduced in the London Borough of Brent to tackle unauthorised use of a privately owned Electric Scooter (E Scooter on the public highway within the London Borough of Brent (Excluding E scooters under any London approved rental trial scheme)?	86%	8%
7	To what extent do you agree that a Public Spaces Protection Order should be introduced in the London Borough of Brent to tackle without lawful authority or reasonable excuse, wilfully causing obstruction on a public highway, whether moving or stationary, including driving in a convoy?	92%	2%

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Count of Value		Column Labels					Grand Total
Row Labels		a) Strongly agree	b) Agree	c) Neither agree nor disagree	d) Disagree	e) Strongly disagree	
To what extent do you agree that a Public Spaces Protection Order should be introduced in the London Borough of Brent to tackle any vehicle driving over Footways, Footpaths and Verges without reasonable or lawful excuse?		94	16		10	1	122
To what extent do you agree that a Public Spaces Protection Order should be introduced in the London Borough of Brent to tackle performing stunts (as to cause a public nuisance)?		105	14		2	3	125
To what extent do you agree that a Public Spaces Protection Order should be introduced in the London Borough of Brent to tackle racing?		106	14		4		125
To what extent do you agree that a Public Spaces Protection Order should be introduced in the London Borough of Brent to tackle Repeated sudden and rapid acceleration as a public nuisance?		95	22		6	2	125
To what extent do you agree that a Public Spaces Protection Order should be introduced in the London Borough of Brent to tackle revving of engine(s) or use of horns as to cause a public nuisance?		90	22		2	2	118
To what extent do you agree that a Public Spaces Protection Order should be introduced in the London Borough of Brent to tackle unauthorised use of a privately owned Electric Scooter (E Scooter on the public highway within the London Borough of Brent (Excluding E scooters under any London approved rental trial scheme		100	7		7	10	124
To what extent do you agree that a Public Spaces Protection Order should be introduced in the London Borough of Brent to tackle without lawful authority or reasonable excuse, wilfully causing obstruction on a public highway, whether moving or stationary, including driving in a convoy?		90	20		8	1	120
Grand Total		680	115		39	19	859

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Do you have any comments about the introduction of a PSPO in the London Borough of Brent surrounding area?

Yes, PSPO should be introduced and enforced

E scooters must be banned completely as they cause great hazard to everyone, drivers, pedestrians and themselves as well.

Please also include loud car stereos in the action that is being taken. It often happens in Flowers Close that people congregate around cars with its doors or boot open and playing music at ear-splitting levels.

I strongly agree that enforceable measures must be taken to stop the use of illegal e scooters using pathways also to stop vehicles parking on grass verges and double parking.

I approve of this PSPO but there is no point introducing it unless you enforce it, the police won't have the time to do it. Who will be the Brent civilian officers issuing the FPNs, will they be the same officers who are meant to issue dog fouling FPNs etc related to the Parks PSPO - because none are issued. Krupa Sheth needs to have the Serco contract rewritten so that CEOs can issue FPNs related to this PSPO. That said if this can cure the problem of delivery scooters driving across the pavement outside OneStop (junction of Tavistock Rd/High St Harlesden) that would be marvellous!

This would be a positive step forward however resource to enforce the PSPO is equally if not of greater importance.

Important to inform contractors and cab drivers not to sit with engines idling and reckless owners of scooters about the enviromental and public dangers. The introduction of a PSPO would help to educate and hold to account individuals who fail to adhere to the rules for public safety and health.

If introduced it needs to be enforced to some extent to be effective

ASB involving vehicles has become a much bigger problem in recent years. Late-night racing and revving of engines is a particular issue, particularly in the summer when people sleep with windows open.

As a pedestrian and non driver the introduction of a PSPO would keep me safer when I am out and about and reduce my stress.

"Antisocial behaviour (ASB) really affects people and the general community from living a peaceful life, it is totally unacceptable. It makes Brent less desirable.

ASB around nuisance vehicles has been reported both online and verbally to Safer Neighbourhoods Team (SNT), Anne Collier & Cynthia Ziman, a regular example is a motorbike scrambler (no number plate) performing a wheelie around Brook Road, Crest Road, usually between 15:30-16:30 on a Friday, also vehicles sounding their horn unnecessarily.

The PSPO is welcomed and with more people working from home these days, ASB is affecting our working environment.

It is unclear how and to what extent the following prohibitions would be enforced;

- A) Revving of Engine(s) or use of horns as to cause a public nuisance;
- B) Repeated sudden and rapid acceleration (as a public nuisance);
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- E) Without lawful authority / excuse wilfully causing obstruction on a public highway, whether moving or stationary, including driving in a convoy;
- F) Use of an E scooter on the public highway without road tax, insurance, lights or number plates;
- G) Any vehicle driving over Footways, Footpaths and Verges.

Vehicle includes a moped, E-scooter, pedal cycle, which includes a power assisted pedal cycle or a pedal cycle in combination with a trailer, constructed or adapted for carrying one or more passengers"

"The proposed PSPO has my personal support.

My only concern is the likelihood that it will not be effectively enforced due to the lack of police boots on the street and the closing of police station public desks."

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Regrettable its necessary but I agree theres been a deterioration especially in this Covid era. Enforcement will be critical to any improvement.

I welcomed this order to be introduced as it is a matter of time when someone or many people start to get injured etc. I see this also as a temporary thing until the education and awareness on how to use these illegal scooter and who can use these e-scooters have significantly increased. Also there must be clear rules and stronger enforcement on this topic of e-scooters as we should keep penalise or give punishment for people that keep breaking these rules and cause not just nuisance but harm in other peoples way.

I find the questions on this survey very limited. The revving or idling of stationery cars should definitely be prevented as should the dangerous driving of e-scooters on pavements and on roads without number-plates, or licences, etc.

Use of e-scooters on road. Or pavement is dangerous to pedestrians and road users. It can lead to secondary collision and as a form of bullying.

Various wards that we work with report issues with illegal activity on e-scooters; on streets; in open spaces public footpaths; car parks; alleyways; service access roads. A major problem if not tackled robustly.

Essential to tackle this misuse of e-scooters for various illegal activities whether it be mugging, drug running or racing - Due to areas across Brent that we work with as a Parks Forum affected - alleyways; open spaces, public footpaths in open spaces; Streets; Access Service Roads, Brent owned car parks we submit this response.

This is essential due to the misuse of e-scooters across various wards in Brent: We work with various parks groups and have observed issues of mugging, drug running and racing using e scooters and mopeds quad bikes and trials bikes. Open spaces; public footpaths in open spaces /parks; in ally-ways and service Roads; on streets, canal towpaths.

The abandoning of vehicles needs to be included in the PSPO. Even after reporting to the DVLA the vehicles still remain.

"1. The survey did not have strongly disagree for all options. The only part of this PSPO that is meaningful is the one relating to causing obstructions as this might not be an already enforceable offence in some circumstances

2. The majority of these issues are already a criminal offence. There are few if any circumstances the PSPO would be practically enforceable except by the police who can already do so. No council officer has the authority to detain or otherwise compel enforcement and reports of breaches would be hearsay at best.

3. Regarding EScooters - as with anything of this nature some ""incidents"" are inevitable (29 ""incidents"" is not a lot by any stretch. How many cycle ""incidents"" were there in the same period?). A knee jerk reaction to ban anything that is remotely awkward is not the solution. EScooters reduce car journeys which reduce traffic which reduces the opportunity far more serious

life threatening incidents and premature deaths from pollution. There is no practical difference between rental scooters and private ones. This PSPO would only serve to penalise otherwise law abiding citizens and do little so solve any real nuisance."

Only one???

Great as long as it is enforced! You do not enforce fly tipping very well by the notice about it at junction Anson Rd and Broadway!

I think it should include parked vehicles with their engine running. A cause of noise and pollution.

It should include the problem of parked vehicles with their engines running for an unnecessarily long time. A cause of noise and pollution.

It would make sense and help older & more vulnerable residents walk in the streets with more confidence and safety.

Excellent idea

Option E on the scooters question was wrongly labelled "strongly agree" when it should say "strongly disagree". This will cause problems in the survey results.

Inconsiderate use of e-scooters is nerve-wracking and potentially dangerous for anyone with mobility, sight or hearing issues

If this came into force and needs to be enforced by the police then this would be an issue. Right now they don't have the capacity to deal with these incidents. There needs to be greater powers and bigger teams to deal when these car meets happen and completely take over a residential road. It's not acceptable that they can just turn up in an evening and take over an entire road and you can't access your home.

My concern is that the police don't have capacity as it is to attend when the car race meet ups happen and completely close our road off. If it's the police that have to impose these new PSPO there needs to be greater police infrastructure.

See everyday loud modified cars speeding down our streets and illegal e-scooters riding in the middle of the roads. I am glad that Brent as a first borough is so brave to do something about it. And I do will support the motion all the way if needed. Thank you

Only strong on the ground enforcement is going to tackle any of these problems. New legislation will be pointless without it.

All these issues are a huge problem on my road, Birchen Grove, particularly at night. Residents asked the council to install speed bumps, but this was not done. Looking forward to someone actually doing something about these issues

"Some of these things are already illegal. How much is this because the police don't pay much attention to them?"

This only makes sense if Brent commit resources to monitoring and intervening in these activities. This would involve a financial commitment. Has that been budgeted?"

I support it

introduce the policy at the level of speed they accelerate :-)

Good idea. Would also be good to tackle obstructions caused by overflowing skips linked to building works and abused by dumpers

Enforcement would be vital

Please do introduce PSPO ASA in Brent. Also spitting of the beetle leaf (Pan) has not stopped in Wembley Central and all areas around the Wembley Park station. Can this issue get Council officers monitoring and issuing fines more vigorously please.

Please add "backfiring" modified type exhausts which create a real sound nuisance. Also very noisy motorbikes; a loud nuisance at all times of day more suited to a racetrack than public roads.

E Scooters are another form of transport like a bike. They pose the same risk as riding a bike. Trying to ban them is wrong.

It should also include modified "backfiring" type car exhausts and very noisy motorbikes more suited to a racetrack!

"1 - Your survey has an error in it which fundamentally undermines the statistics you are trying to collect - the two options at the extremes for question 6 are 'Strongly Agree' and 'Strongly Agree'. Unless you are deliberately trying to skew the results in the favour of people agreeing to your suggestion in question 6 (which would be a huge flaw in the survey and quite unethical), one of these options would be 'Strongly Disagree'.

As there is not a 'Strongly Disagree' option I had to choose 'Disagree' - but this obviously affects the results for this question and makes the depth of feeling about this seem much weaker.

2 - The reason I strongly disagree with question 6 is that the whole approach to a ban on e-scooters is just a complete waste of time and energy that could be better spent on other issues, or tackled in other ways. For instance:

a) e-Scooters are here to stay, and if you think you can ban them, great, but this is just going to be like trying to ban honking your horn after 11.30pm. It will be a law, but no one will abide by it if they don't want to. So police will be needlessly called out to investigate.

b) Not only are e-Scooters here to stay, but we need them to help with making people travel in more healthy and environmentally conscious ways. If public transport is to be cut back in future, and if we are serious about getting cars off the roads, then e-Scooters should be one part of the way we achieve this.

c) While e-Scooters are available to hire elsewhere in London (though granted not yet in Brent sadly), it sends a mixed message and rather hypocritical message to the public - 'you can't \*OWN\* one of these machines but you can \*RIDE\* one'... it just introduces too much confusion and mixed messaging.

d) You point out a map of 'hot spot' areas, but hot spots for what? All of these hot spots in Harlesden town centre have existing problems with anti-social behaviour - maybe if you tackled that first, then the use of these scooters would move away from this area. In fact, maybe the anti-social behaviour in these places draws e-Scooters into these zones for drug use, robbery, etc. If you clean up the area, then people wouldn't use these vehicles for that. There are plenty of people in these zones that deal drugs and cause anti-social behaviour but who arrive on foot or in cars - but you aren't banning those activities. Again, it seems contradictory and pointless.

e) Outside of the subject of e-Scooters, is it not the case that you can tackle the issues you raise in the questionnaire through other laws you have in place - revving vehicles, repeated acceleration etc. etc. could be traffic offences, dangerous driving, noise nuisances and so on. So why do you need to introduce new laws - just use and enforce the existing ones? Like the example above, this is another situation where you have mis-interpreted the real problem (i.e. existing anti-social behaviour) and instead of tackling that your proposals overreach and tackle a different issue that is the result of the anti-social behaviour, not a cause of it."

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b) Not only are e-Scooters here to stay, but we need them to help with making people travel in more healthy and environmentally conscious ways. If public transport is to be cut back in future, and if we are serious about getting cars off the roads, then e-Scooters should be one part of the way we achieve this.

c) While e-Scooters are available to hire elsewhere in London (though granted not yet in Brent sadly), it sends a mixed message and rather hypocritical message to the public - 'you can't \*OWN\* one of these machines but you can \*RIDE\* one'... it just introduces too much confusion and mixed messaging.

d) You point out a map of 'hot spot' areas, but hot spots for what? All of these hot spots in Harlesden town centre have existing problems with anti-social behaviour - maybe if you tackled that first, then the use of these scooters would move away from this area. In fact, maybe the anti-social behaviour in these places draws e-Scooters into these zones for drug use, robbery, etc. If you clean up the area, then people wouldn't use these vehicles for that. There are plenty of people in these zones that deal drugs and cause anti-social behaviour but who arrive on foot or in cars - but you aren't banning those activities. Again, it seems contradictory and pointless.

e) Outside of the subject of e-Scooters, is it not the case that you can tackle the issues you raise in the questionnaire through other laws you have in place - revving vehicles, repeated acceleration etc. etc. could be traffic offences, dangerous driving, noise nuisances and so on. So why do you need to introduce new laws - just use and enforce the existing ones? Like the example above, this is another situation where you have mis-interpreted the real problem (i.e. existing anti-social behaviour) and instead of tackling that your proposals overreach and tackle a different issue that is the result of the anti-social behaviour, not a cause of it."

A useful tool for Brent to use to prevent these dangerous uses of all vehicles in Brent including illegal e scooters or misused legal scooters (if an e scooter scheme was ever applied to Brent)..

It will be welcomed. At present on all bank holiday weekends or occasion weekends and other non occasion adhoc weekends a large number of vehicles 50 to 100 and increasing at each event congregates in front my building on central way and for hours revving their engines loudly, making banging noises, dangerously driving, speeding and skidding round the round about. Swearing at residents and at one of the residents primary school age child who was looking out the window. Littering the street with lots of these strange silver metal bottles. Making lots of toxic smoke with their cars in purpose. Blocking the buses the ambulance and obstructing the police when they arrive. Obstructing other road users. But the worse is the noise. The noise that is non stop for several hours through the night and we have kids and jobs Itâ€™s really dangerous, disruptive and unkind. More than just a nuisance itâ€™s completely unacceptable!

Mainly happens at night

A useful tool to support Policing of this issue.

E-scooters being driving over pavements, especially outside my son's school, and by people going through Zebra crossings and traffic lights using E-scooters has become a complete menace. My young (10 and 7 year old children) have narrowly missed being injured by uninsured people driving these around St Joseph's Junior School in Wembley and on Wembley High Road. It makes us fearful to go to the shops or walk to school. We travel by car now, as it is becoming too dangerous with these motorised E-Scooters weaving in and out of the pavements when you have small, vulnerable children who may be killed. Please, please, please clamp down on it Brent and the police.

Does it have a time limit? And will there be ongoing reporting to see how effective the measures are?

i will full support to introduce PSPO in Borough of brent as e-scooter become hazzard and safety issue on road. they do not have any control on their speed or follow any rules. e-scooter driver are very youngs as school ages which do not have any enough knowledge of road safety.

Can the Police, Ambulance and Fire services use sirens only when absolutely required? Also, their sirens are way too loud - there should be a legal limit to how loud sirens can be.

there is a big issue of cars with customised exhausts which are a major noise pollution and also e-scooters which are a danger since you cannot hear them and they are going very fast. Especially around sudbury court estate.

I am nearly 80 years old and find the use of e-scooters quite frightening as I cannot hear them approaching and they are often used on pavements.

This PSPO should also include the use of bicycles on pavements as more and more adults are using these rather than the roads.

E-scooters are my biggest concern and it would be great to get as many as possible off the pavements.

Making new rules won't in itself change anything. Brent will need to enforce them assiduously. They do not have a good track record on enforcement so it will require some effort.

Many adults ride e-scooters with their children on front and also with a rider on the back.

It is a good idea.

This order would help provide safety for pedestrians and older residents in the borough.

"This would be much welcome.

Where I live, we suffer from high powered vehicles with very loud exhaust systems going at speeds which I'm sure excess 30 or even 40mph.

This is between Sudbury and Harrow Road train station and the Keelers roundabout in Sudbury Town.

It's a 20mph road but without road bumps or a speed camera, vehicles can push their engines to the limit.

It's a miracle a major road accident hasn't happened yet."

Iâ€™m in favour of it, but please extend to Clarendon Gardens too. The way vehicles shoot up in between speed bumps and constantly break the 20mph speed limit, not to mention persistently drive the wrong way past the island outside number 30/32 and 33/35 even though there is an arrow sign one way (can the other one be replaced please!). Even if you donâ€™t speak/read English you should be able to recognise an arrow for heavenâ€™s sake! As for vehicles parking over the whole pavement. These houses werenâ€™t meant for 6 vehicles per building which is why the overflows use the pavement, to the detriment of pedestrians.

these issues need to be tackled, particularly e-scooters on pavements and weaving in and out of traffic

E scooters are a very good means of transport for young people. They are cheap and reduce the number of cars on the road.

I donâ€™t know how this could be enforced even if brought in, without the necessary funds and resources.

I'd prefer these powers to be exercised by the police rather than by the council - I trust the former more than the latter. The council and its contractors are difficult to deal with and to trust.

Fully support the idea

Very useful if used in conjunction with Met Police Enforcement. Both have to work in tandem otherwise this will not be as effective.

Good idea

Good idea

They should be used more to reduce ASB. Firework use and legal highs would be a good target selection to start with

It would be very welcome. Each weekend we are unable to sleep due to cars using our road as a racing track.

PSPO would be very helpful in curbing drivers who race down our street with modified exhausts which make a loud noise especially during day and night time.

Long overdue. I am personally affected by people speeding all hours of the day on the road, the noise affects my sleep. Also I'm more reluctant to go for walks due to scooters and cyclists speeding on the pavement. Ignoring these bad behaviours lead to other bigger crimes and issues. Also builders parking on pavement and damaging paving stones and grass verges should be tackled as well.

"It seems to me that many or most of these are covered by existing laws, so it is not clear what benefit there is in a PSPO. The problem seems to be a lack of enforcement rather than a lack of laws to enforce.

I think the figure in the figure for driving over pavements in the supporting document is a gross underestimate. I'd estimate around 10% of local houses regularly drive over verges. It is quite common to see cars parked in front yards in a way where they could only have got there by a illegal crossover, and sometimes in yards with no legal crossover. Front walls are allowed to collapse to facilitate this and planning conditions on front walls and soft landscaping are blatantly ignored to allow it. I've seen front walls rebuilt very short, with the only obvious reason being to permit such crossovers.

I found the types of vehicles, at least in the offline version, confusing. In particular, does ""passenger"" include driver, as otherwise, motorcycles and pedal cycles are exempt, but most of the stunts I see are on those (particularly pedal cycles)."

"The PSPO should also apply to e-scooters in parks on and off paths; parks are public land too.

Part G appears to prohibit bicycles from using footpaths, some of which currently are for shared use. Also, some paths in parks are specifically for bicycles and connected to bicycle routes, they are generally shared pedestrian and cycle paths. Could ""unless designated for shared use"" be added to part G or a separate bullet point be written for bicycles, which would be clearer and could be more accurately worded than combining bicycles with other vehicles.



Part G includes verges; it is unclear about how large a section of grass it refers to. The PSPO should also prohibit vehicles from driving over public grassland and parkland. If they are prohibited on park pathways they are not prohibited from just pulling off the pathway and driving on the grass."

There are too many people with attitude using these types of motorised transport in many parts of London without any due care or attention to others or even themselves. Being able to police these activities in Brent will maybe bring about safer public spaces for the very young, disabled and the elderly and more importantly safer footways. 100% for the introduction of a PSPO.

We have a motorcyclist who regularly does wheelies up and down our street in Randall Avenue. I have told the police on a number of occasions as it is dangerous to him and us and the sound is very loud and annoying. Nothing has been done up to now. I have sent the police video but the motorcyclist has no plates so they said they can't do anything.

Very pleased that this aspect of nuisance is being addressed.

Cars hooting in convoy and circling round is a serious problem to me, pollution of air and noise and feels aggressive, can be threatening and is very antisocial. re Scooters, it would be better to make use of safe speed restricted vehicle and helmets, find a way to use safely

I'm mostly disturbed by revving, idling or speeding cars. Never had an incident with electrical scooters or seen anything happening. I'm supportive of electrical scooters and I think the same laws as bicycles should be applied to electrical scooters. They are safe, and environmentally friendly. And reduce the need to public transport or car

Before putting a PSPO in place there should be full consultation with all local stakeholders to get community buy-in, with a clear understanding of how the police would enforce it.

This PSPO is so worded that it will outlaw reasonable protest and use of (when legalised) private e-scooters. It is reasonable to tackle vehicles likely to cause harm or annoyance, but not to outlaw protest or reasonable use of low emissions vehicles.

It's surprising, irresponsible and pointless to see pedal cycles aggregated with motor vehicles. And the answers here ONLY refer to motor vehicles when 'vehicles' is mentioned. People cycling have no choice, in places, but to use the footpath to either get somewhere safely or access a cycle lane (ex: Quietway 3 in Gladstone Park). The biggest danger comes from motor traffic. This is where you need to concentrate your effort and resources. If a cyclist behaves without due consideration for pedestrians on the pavement, the police already has powers to address this. The vast majority of occurrences is simply to keep safe and the police knows that. The correct approach is to look at where there are people cycling on pavement and remedy the road danger that is causing this.

"I am writing on behalf of Sudbury Court Residents Association, representing approximately 3000 households. We receive numerous reports about antisocial use of motor vehicles including:

- Speeding

- Loud revving of engines, often at night

- Idling, especially late at night

- Dangerous/careless driving

- Pavement parking leading to obstruction, especially for those using wheelchairs or pushing buggies.

As such we fully support the PSPO with respect to inconsiderate and dangerous use of motor vehicles.

There are many reports of damaged street furniture (railings, bollards, sign posts), pavements and grass verges caused by motor vehicles so this needs to be addressed.

We have had some reports of illegal use of e-scooters so support such enforcement, however this is perplexing as this already falls under the remit of the police.

We find it bizarre that the use of cycles/e-cycles has been grouped together under the umbrella term of vehicles in this consultation, as data shows they pose a significantly lower risk. The revised highway code will introduce a hierarchy of road users which ensures that those road users who can do the greatest harm have the greatest responsibility to reduce the danger or threat to they may pose to others. As such, motor vehicles that pose a much greater risk, should be treated differently.

We do witness occasional pavement cycling, however we have not had any reports of nuisance caused by this.

Children and adults cycling on pavements is a sign of unsafe roads and poor cycling infrastructure as they are fearful of being injured by motor vehicles. We urgently require safer roads and cycling infrastructure for our residents that chose to cycle.

Although technically illegal, cycling on pavements is tolerated by the police if done considerately and the cyclist has genuine safety concerns about the road. North Wembley is noted above as one of the Vehicle Nuisance Hotspots, and often children and adults cycle on the pavement near here as there have been numerous motor vehicle collisions in this area.

We would not support any action against people cycling on pavements if there is legitimate reason for them to do so, and if it can be proved beyond reasonable doubt that they were being inconsiderate to pedestrians."

I think it is a good idea as there are many health and safety risks for residents of Brent.

Useful adjunct if used with Police enforcement.

Racing used to happen a lot in the summer, really its the police who need to come and monitor these issues. The people doing these things are already breaking the law. I am positive about the protection order but I am not sure how this will help residents? Will you actually catch people from this? Or will I end up calling the police and they tell me they cant do anything or they just take the report and nothing happens?

Even if they are part of a trial scheme or are made legal e-scooters should be banned in parks. Supporters say they are an alternative to cars but we don't have cars driving in our parks except for official business, eg Parks dept, deliveries to cafes. A strong message should be sent out that e-scooters are not allowed on pavements.

E-scooters, whether in a trial or not, should be banned from parks. Their advocates say they are an alternative to a car but cars are not allowed in Brent parks. And any e-scooter must be illegal on the pavement. whether being ridden or parked.

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submitted_at	started_at	Do you have any comments about the introduction of a PSPO in the London Borough of Brent surrounding area?	If yes, how would you describe your disability
18/11/21	18/11/21	Inconsiderate use of e-scooters is nerve-wracking and potentially dangerous for anyone with mobility, sight or hearing issues	Arthritis
18/11/21	18/11/21	Excellent idea	chronic osteoarthritis of the knees
17/11/21	17/11/21	Great as long as it is enforced! You do not enforce fly tipping very well by the notice about it at junction Anson Rd and Broadway!	Difficulty walking as have longterm severe back pain and blood cancer that causes extreme fatigue
14/11/21	14/11/21	Use of e-scooters on road. Or pavement is dangerous to pedestrians and road users. It can lead to secondary collision and as a form of bullying.	Dislexic
23/11/21	23/11/21	Please do introduce PSPO ASA in Brent. Also spitting of the beetle leaf (Pan) has not stopped in Wembley Central and all areas around the Wembley Park station. Can this issue get Council officers monitoring and issuing fines more vigorously please.	I have a mobility constraint
01/12/21	01/12/21	I am nearly 80 years old and find the use of e-scooters quite frightening as I cannot hear them approaching and they are often used on pavements.	I have spinal problems, which means my legs sometimes feel weak and numb, making it difficult to move quickly. I also wear hearing aids.
10/11/21	10/11/21	Important to inform contractors and cab drivers not to sit with engines idling and reckless owners of scooters about the enviromental and public dangers. The introduction of a PSPO would help to educate and hold to account individuals who fail to adhere to the rules for public safety and health.	Long term health condition.
21/11/21	21/11/21	introduce the policy at the level of speed they accelerate :-)	mental and physical
02/12/21	02/12/21	I don't know how this could be enforced even if brought in, without the necessary funds and resources.	Rheumatoid Arthritis
25/11/21	25/11/21	E Scooters are another form of transport like a bike. They pose the same risk as riding a bike. Trying to ban them is wrong.	Speech
18/11/21	18/11/21	No comment	Spine pain results from a industrial accident
09/11/21	09/11/21		Stutter.
19/12/21	19/12/21	E-scooters, whether in a trial or not, should be banned from parks. Their advocates say they are an alternative to a car but cars are not allowed in Brent parks. And any e-scooter must be illegal on the pavement. whether being ridden or parked.	Visual impairment
19/12/21	19/12/21	Even if they are part of a trial scheme or are made legal e-scooters should be banned in parks. Supporters say they are an alternative to cars but we don't have cars driving in our parks except for official business, eg Parks dept, deliveries to cafes. A strong message should be sent out that e-scooters are not allowed on pavements.	Visual impairment

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## EQUALITY ANALYSIS (EA)

<b>POLICY/PROPOSAL:</b>	PSPO Nuisance Vehicles and E Scooters
<b>DEPARTMENT:</b>	Community Protection
<b>reworded TEAM:</b>	Anti-Social Behaviour Team
<b>LEAD OFFICER:</b>	Simon Egbor
<b>DATE:</b>	

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

### SECTION A – INITIAL SCREENING

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

The Anti-Social Behaviour, Crime and Policing Act 2014 sets out the tools and powers available to Anti-Social Behaviour partnerships. A tool made available to local government only is the Public Spaces Protection Order (PSPO). This gives councils the ability to enforce with Fixed Penalty Notices or court action any behaviour causing nuisance, alarm, harassment or distress to those who live, work or visit an area. The council has effectively utilised PSPO powers in order to control street drinking since (date). The powers are a critical complementary tool to powers provided to the police and other agencies.

The proposal within this report is to adopt a borough-wide Public Spaces Protection Order (PSPO) in relation to nuisance vehicles and use of e-scooters, for the reasons set out in the body of the report. The behaviours that will fall within the proposed PSPO include street racing and driving in a dangerous way that not only causes excessive noise nuisance for people living and working in Brent but has resulted in a number of accidents and fatalities (can you give me an example ?) in recent years. Other related nuisances within the scope of this proposal include vehicles driving in convoys with no legal justification, vehicles causing obstruction on a public highway and driving over footpaths. This results in damage to the council's infrastructure and endangers the safety of pedestrians and other motorists.

In recent years and particularly during the past 18 months, a significant increase in complaints related to nuisance vehicles has been experienced. In addition, the increased use of E-Scooters has resulted in the requirement to review the powers available in respect of this relatively new form of transport in order to ensure that they are used appropriately and legally. As a result, the council is considering the implementation of a PSPO that will address the following issues;

- I. Revving of Engine(s) as to cause a public nuisance
- II. Repeated Sudden and rapid acceleration (as a public nuisance),
- III. Racing
- IV. Performing stunts (as to cause a public nuisance)
- V. Without lawful authority or reasonable excuse wilfully causing obstruction on a public highway, whether moving or stationary, including driving in a convoy
- VI. Vehicles driving over Footways, Footpaths and Verges without reasonable or lawful excuse (Illegal Crossovers)

- VII. Unauthorised use of a privately owned Electric scooter (E scooter) on the public highway within the London Borough of Brent. (Excluding E scooters under any London approved rental trial scheme).

This proposal is to keep the borough safe, clear of obstruction to protecting life as well to ensure where this is not the case that it uses the relevant legislation and approaches to maintain a clean and safe environment. The PSPO will ensure that there is no direct or indirect discrimination, harassment or victimisation, that people with a protected characteristic have equality of opportunity as those who do not have a protected characteristic.

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

This prohibition applies to any area within London Borough of Brent, footway, footpath or grass verge maintainable at the public expense or managed by the Local Authority and which is adjacent to the carriageway or footway of a highway, including adjoining footpaths.

Vehicle "includes a moped, E-scooter, pedal cycle, which includes a power assisted pedal cycle or a pedal cycle in combination with a trailer, constructed or adapted for carrying one or more passengers.

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

Yes

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

**1. Revving of Engine(s) as to cause a public nuisance**

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))			x
Gender (Men / Women)		x	
Race		x	
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)		x	
Religion / Belief		x	



Sexual Orientation (Gay / Lesbian / Bisexual)		x	
Gender Re-assignment		x	
Marriage & Civil Partnership		x	
Pregnancy & Maternity		x	

### Negative Impact

Excessive use of engine revolutions as a way of attracting attention to cars/ motorbikes owned by young people.

### 2. Repeated sudden and rapid acceleration (as a public nuisance);

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))			x
Gender (Men / Women)			
Race		x	
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)		x	
Religion / Belief		x	
Sexual Orientation (Gay / Lesbian / Bisexual)		x	
Gender Re-assignment		x	
Marriage & Civil Partnership		x	
Pregnancy & Maternity		x	

### Negative Impact

Young people are a cohort with a tendency to more likely to engage in sudden and rapid acceleration of their vehicle to show the strength and modification done on the cars.

### 3. Racing

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))			x
Gender (Men / Women)		x	
Race		x	
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)		x	
Religion / Belief		x	
Sexual Orientation (Gay / Lesbian / Bisexual)		x	
Gender Re-assignment		x	
Marriage & Civil Partnership		x	
Pregnancy & Maternity		x	

### Negative Impact

Young people are more likely to engage in racing. In some cases these drivers engage in races on the local road network, putting both themselves and others at risk.

#### 4. Performing stunts (as to cause a public nuisance);

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))			x
Gender (Men / Women)		x	
Race		x	
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)		x	
Religion / Belief		x	
Sexual Orientation (Gay / Lesbian / Bisexual)		x	
Gender Re-assignment		x	
Marriage & Civil Partnership		x	
Pregnancy & Maternity		x	

### Negative Impact

Most young people more likely get involved in a range of stunts that include accelerating and braking heavily, as well as spinning their cars.

#### 5. without lawful authority / excuse wilfully causing obstruction on a public highway, whether moving or stationary, including driving in a convoy;

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))		x	
Gender (Men / Women)		x	
Race		x	
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)		x	
Religion / Belief		x	
Sexual Orientation (Gay / Lesbian / Bisexual)		x	
Gender Re-assignment		x	
Marriage & Civil Partnership		x	
Pregnancy & Maternity		x	

#### 6. Use of an E scooter on the public highway without road tax, insurance, lights or number plates

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))			x
Gender (Men / Women)		x	
Race		x	
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)		x	
Religion / Belief		x	
Sexual Orientation (Gay / Lesbian / Bisexual)		x	
Gender Re-assignment		x	
Marriage & Civil Partnership		x	
Pregnancy & Maternity		x	

### Negative Impact

All ages likely to be significantly impacted as community have concerns, which do include the nuisance and danger seen and unforeseen, direct and indirectly being caused by some e-scooter users.

### 7. Any vehicle driving over Footways, Footpaths and Verges.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age (Younger People (17-25) and Children / Older People (60+))			x
Gender (Men / Women)		x	
Race		x	
Disability (Learning Difficulties / Hearing Impairment / Visual Impairment / Physical Disability / Mental Illness)		x	
Religion / Belief		x	
Sexual Orientation (Gay / Lesbian / Bisexual)		x	
Gender Re-assignment		x	
Marriage & Civil Partnership		x	
Pregnancy & Maternity		x	

### Negative Impact.

Most likely delivery drivers on mopeds will significantly be impacted. Socio economic factors could also encourage the drivers to maximise their earnings by utilising short cuts to increase the time available to make additional deliveries.

## SECTION B – IMPACTS ANALYSIS

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

The consultation process ran from 8/11/2021 to 20/12/2021 to adopt a borough-wide Public Spaces Protection Order (PSPO) in relation to issues of Nuisance Vehicles and E Scooters. Ensuring use of the relevant legislation and approaches to maintain a clean and safe environment and deal with other local environmental quality issues including anti-social behaviour.

126 respondents participated in the consultation to introduce the PSPO. Brent population as a whole, which conveys how representative respondents were in respect of age, ethnicity, religion, gender, disability, sexual orientation and gender identity. Older age groups are massively overrepresented in taking part in the consultation. Residents aged 45+ make up about two thirds of respondents (70/104, 67.5%). Over 35% of respondents were White, 15% Asian and 9% Black. 14% of respondents identified as having a disability and over 3% identified as being Lesbian, Gay or Bisexual. Over 45% of respondents identified as Christian, 18% other and just over 5% Muslim and Hindu.

Most responses came from Dollis Hill, Mapesbury and Northwick Park, and the least from Alperton, Fryent, Kenton, Kilburn & Queensbury.

Over 85 % of all responses strongly agreed or agreed with all prohibitions consulted on while under 5% of all responses strongly disagreed or disagreed with the proposals for nuisance vehicles, with 8% disagreeing or strongly disagreeing with the proposed measures in relation to E Scooters.

The majority of respondents did put in supportive comments around the introduction of the PSPO and expressed it would help tackle dangerous driving and illegal crossovers which is seeing a year on year increase. Others felt the introduction of the order would also help police, illicit drug activity that is being perpetrated using E Scooters, giving the police greater powers to stop and account.

There was also direct representation made by the Brent Cycling Campaign who felt the inclusion of pedal cycles within the scope of the order for mounting or riding on the pavement for practical reasons, due to road width restrictions or a cycling instructor taking a few school kids out on a lesson, could be penalised under the order. However, this would fall outside the scope of enforcement as that would be classed as a reasonable and lawful excuse, with a nuisance test always applied by the enforcement officer. The Council's position was further clarified to Brent Cycle Campaign.

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

<b>AGE</b>	
<b>Details of impacts identified</b>	<p><b>Negative</b></p> <p>Young drivers may be more likely to engage with misuse of their vehicles from showing off their high performance vehicle. In addition E-scooters been associated with the young people with reckless use on footpath ways causing danger to pedestrian.</p> <p>The mitigating action to address this would be ensuring information on the PSPO is communicated using on street outreach in hot spot locations. In addition, a separate communications plan will be developed to ensure awareness raising through social media platforms which young people use. The PSPO focuses on the misuse of vehicle within the borough irrespective of the age and enforcement officers will not take the age of the individual to account.</p>
<b>DISABILITY</b>	
<b>Details of impacts identified</b>	<p><b>Neutral</b></p> <p>At this stage, we do not have any data to suggest that this group would be any more or less likely than the rest of the population to breach the terms of the proposed PSPO. Information will be communicated in an accessible way to ensure people with a disability understand the changes and are not adversely impacted.</p> <p>The mitigating actions to address this would ensure signage is in large print, plain English and use of pictures to make sure the prohibitions are clearly communicated. Officers will also ensure individuals who are warned in the first instance are referred to ASB Team to ensure vulnerability checks are conducted to shape what consequent action might be taken.</p>
<b>RACE</b>	
<b>Details of impacts identified</b>	<p><b>Neutral</b></p> <p>The PSPO focuses on the misuse of vehicle within the borough irrespective of the race and enforcement officers will not take race of the individual to account when executing the order. The order will apply to everyone however, we cannot suggest if a particular race may be disproportionately affected by the PSPO.</p>
<b>SEX</b>	
<b>Details of impacts identified</b>	<p><b>Neutral</b></p> <p>The PSPO focuses on the misuse of vehicle within the borough irrespective of gender of the driver, which will not influence action of the enforcement officers or during the executing of the order, gender will not be taking to account but the nuisance of the vehicle will be the focus. However we acknowledge most of the drivers are males so we expect they may be disproportionately affected by the PSPO.</p>

<b>SEXUAL ORIENTATION</b>	
<b>Details of impacts identified</b>	<p><b>Neutral</b></p> <p>At this stage, we do not have any data to suggest that this group would be any more or less likely than the rest of the population to breach the terms of the proposed PSPO. Therefore, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic.</p> <p>We will mitigate any potential equality gaps or issues by capturing the necessary information tailored towards the protected characteristic during the implementation of the PSPO. Enforcement officers will be equipped with electronic devices to capture all equality data.</p>
<b>PREGANCY AND MATERNITY</b>	
<b>Details of impacts identified</b>	<p><b>Neutral</b></p> <p>There is no evidence to suggest pregnancy and maternity would be affected by the PSPO. We will mitigate any potential equality gaps or issues by capturing the necessary information tailored towards the protected characteristic during the implementation of the PSPO. Enforcement officers will be equipped with electronic devices to capture all equality data.</p>
<b>RELIGION OR BELIEF</b>	
<b>Details of impacts identified</b>	<p><b>Neutral</b></p> <p>Christian and other religions are a little overrepresented, Muslim and Hindu respondents are underrepresented. At this stage, we do not have any data to suggest that this group would be any more or less likely than the rest of the population to breach the terms of the proposed PSPO. Therefore, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic.</p> <p>We will mitigate any potential equality gaps or issues by capturing the necessary information tailored towards the protected characteristic during the implementation of the PSPO.</p>
<b>GENDER REASSIGNMENT</b>	
<b>Details of impacts identified</b>	<p><b>Neutral</b></p> <p>At this stage, we do not have any data to suggest that this group would be any more or less likely than the rest of the population to breach the terms of the proposed PSPO. Therefore, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic.</p> <p>We will mitigate any potential equality gaps or issues by capturing the necessary information tailored towards the protected characteristic during the implementation of the PSPO.</p>
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>	

<b>Details of impacts identified</b>	<p><b>Neutral</b></p> <p>At this stage, we do not have any data to suggest that this group would be any more or less likely than the rest of the population to breach the terms of the proposed PSPO. Therefore, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic.</p> <p>We will mitigate any potential equality gaps or issues by capturing the necessary information tailored towards the protected characteristic during the implementation of the PSPO.</p>
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### 3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

<p><b>Yes</b></p> <p><b>Age</b></p> <ul style="list-style-type: none"> <li>All members of the community are treated fairly and equally regardless of age. Where necessary additional support measures would be put in place through prevention, education and sign posting to relevant service that can offer support.</li> <li>Young People – will be referred into safeguarding mechanisms and under 18's parents/guardians will be spoken with.</li> <li>Before the commencement of the PSPO, officers (Brent Council and Police) will be educated on organisation's equal opportunities and diversity policies. The aim and objectives of the PSPO is to keep the borough safe and clear of obstruction by focussing on vehicles, being used a nuisance, which is or is likely to cause harassment, alarm or distress to the community.</li> </ul> <p><b>Disability</b></p> <ul style="list-style-type: none"> <li>Vulnerability checks will be conducted on all individuals at the warning stage. We would address any disability concerns, put additional support measures in place if required through prevention, education and sign posting to relevant services, and improve accessibility. Often a mental health condition or learning disability may be adversely affected. Behaviour may be mistaken as disorderly when it is linked to a disability.</li> <li>Under 16's will be referred into safeguarding mechanisms and parents/guardians will be spoken with where necessary.</li> <li>Ensure partnership working with Community MARAC for extreme vulnerability that needs multi agency intervention.</li> </ul> <p><b>Race</b></p> <ul style="list-style-type: none"> <li>All members of the community are treated fairly and equally regardless of race.</li> <li>The notice will have a clear pictorial representation showing the various prohibitions not permitted in the area.</li> <li>Both the police and council officers undergo diversity awareness training and are aware of their organisation's equal opportunities and diversity policies and procedures.</li> <li>Romany Gypsies and Irish Travellers are legally recognised as ethnic groups, and protected from discrimination by the Equality Act 2010 and the Human Rights Act 1998.</li> </ul> <p><b>Sex</b></p>
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- All members of the community are treated fairly and equally regardless of gender. Where necessary additional support measures would be put in place through prevention, education and sign posting to relevant service that can offer support.

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

There was also direct representation made by the Brent Cycling Campaign who felt the inclusion of pedal cycles within the scope of the order for mounting or riding on the pavement for practical reasons, due to road width restrictions or a cycling instructor taking a few school kids out on a lesson, could be penalised under the order. However, this would fall outside the scope of enforcement, as that would be classed as a reasonable and lawful excuse, with a nuisance test always applied by the enforcement officer. The Council's position was further clarified to Brent Cycle Campaign.

Social media platform such as twitter, Facebook were also used to promote messages out to young people about the consultation. Local police teams also did street briefings at locations where the young people hang out in the priority wards.

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

Yes - we will mitigate any potential gaps or issues by capturing the necessary information tailored toward people affected during the implementation of the PSPO.

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

There is potential for negative impacts remaining due to the arguments already raised about the potential for some groups to be overrepresented. Nevertheless, there will be an ongoing positive requirement to support these groups.

Staff issuing PSPOs will be trained on equality and diversity, and the different needs of residents, equality monitoring questions are asked, and that information is provided in an accessible clear way to residents.

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

This will be monitored through the Brent Joint Action Group (Multi Agency offender management panel) which meets once every month. It will also include monitoring equality characteristics for those in breach of the PSPO.

## SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you



can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The proposal to adopt a borough-wide Public Spaces Protection Order (PSPO) is in line with this priority. In particular, issues of anti-social behaviour, which includes matters that cause harassment, annoyance and / or nuisance. The Council knows that the majority of those who live, work and visit the borough do keep the area safe and clear of obstruction; however, it wants to ensure where this is not the case that it uses the relevant legislation and approaches to maintain a clean and safe environment.

The behaviours identified for the proposed PSPO include street racing, driving in a dangerous way which not only causes excessive noise nuisance for people living and working in the London Borough of Brent but has resulted in a number of accidents and fatalities in the last few years. Other related nuisances within the scope of this proposal include vehicles driving in convoys with no legal justification, vehicles causing obstruction on a public highway and driving over footpaths. This results in damage to the Council's infrastructure and endangers the safety of pedestrians and other motorists.

Under Section 59 of the Anti-Social Behaviour Crime and Policing Act 2014 a Public Spaces Protection Order (PSPO) may be made by the Council after consultation with the Police, Mayor's Office for Policing and Crime, and any other relevant bodies, groups or individuals (such as community leaders or users of a particular area/facility). The PSPO places restrictions and/or requirements on people using the area defined by the PSPO. These can be blanket restrictions or targeted at particular groups (such as dog walkers), or apply at certain times. Breach of a PSPO is a criminal offence that could lead to a fixed penalty notice of £100 or a maximum penalty of £1000 if prosecuted. The creation of the Anti-Social Behaviour (ASB) legislation has given local authorities the opportunity to bring in proportionate measures for a maximum of 3 years and is being adopted by many local authorities in the UK.

For these vulnerable groups where necessary additional support measures would be put in place through prevention, education and sign posting to relevant services.

Where persistent ASB is being committed by any of these vulnerable groups they would be a priority at CSU meetings under – High risk and vulnerable persons and would have additional target support through the Brent Joint Action Group (BJAG). The BJAG is a multiagency panel which meets monthly to tackle ASB and Crime hotspots. Similarly support will also be offered at Community MARAC which supports vulnerable individuals engaged or impacted by anti-social behaviour or crime. We will ensure holistic, multi-agency interventions are applied when dealing with these groups. Enforcement officers will enforce proportionately, assessing each breach on a case-by-case basis with warnings issued in the first instance and fixed penalty notices should there be non-compliance. All individuals issued with warnings will be shared with the Anti-Social Behaviour Team, where background checks on individuals will be conducted with mental health and support services to identify the best course of action and this often will not result in enforcement. A further breach of the warning could result in a £100 fine.

The rights of individuals will be respected and all practices carried out lawfully with robust arrangements for support services, interventions, sign posting referrals and welfare assessment with provision of appropriate support as necessary.

There will be clear signage within the borough making everyone reasonably aware of the prohibitions. There will also be specific targeted communications, utilising social media and other media outlets to ensure the prohibition is fully understood.

The following articles of the Human Rights Act have been considered:

**Article 1: Protection of Property**

Point to be considered:

1. Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions (example vehicle) except in the public interest and subject to the conditions provided for by law and by the general principles of international law. However, the positive impact would be to safeguard members of the public and the wider community.

**Article 2: Right to Life**

Point to be considered:

2.2 (b) in order to effect a lawful arrest or to prevent the escape of a person lawfully detained; The PSPO Prohibition around nuisance recognised as positive to safeguard members of the public and the wider community.

**Article 6: Right to a Fair Trial**

Everyone charged with a criminal offence has the following minimum rights:

(a) to be informed promptly, in a language which he understands and in detail, of the nature and cause of the accusation against him;

**Article 8: Right to respect for private and family life**

Point to be considered:

8.2 There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

The positive impact reduces the risk to members of the community of threat, risk and harm. It can also provide a route into support agencies.

**Article 10: Freedom of expression**

Point to be considered:

10.2 The exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society, in the interests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals, for the protection of the reputation or rights of others, for preventing the disclosure of

information received in confidence, or for maintaining the authority and impartiality of the judiciary.

The positive impact is that the removal of alcohol may modify behaviour and, where relevant, better enable support service engagement.

## SECTION D – RESULT

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

## SECTION E - ACTION PLAN

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

Action	Expected outcome	Officer	Completion Date
--------	------------------	---------	-----------------


<p><b>DISABILITY</b></p> <p>Communication and information provided in accessible to ensure people with a disability that affects communication or information needs understand the proposal – for example making sure information is in large print and Easy Read</p> <p>Training PSPO officers on equality and diversity, including understanding the needs of residents making sure information is in large print and Easy Read</p> <p>As for disability concerns, additional support measures are in place if required through education and sign posting to relevant services to improve accessibility</p>	<p>All disabled groups are reasonably made aware of the order and relevant signage put in place.</p>		
<p><b>SEXUAL ORIENTATION</b></p> <p>We will mitigate any potential equality gaps or issues by capturing the necessary information tailored towards the protected characteristic during the implementation of the PSPO.</p>	<p>To monitor trends and identify positive requirements, including specific engagement with those groups, should there be an overrepresentation of this group who contravene the prohibition.</p>	<p>Simon Egbor</p>	<p>Throughout the duration of the order</p>
<p><b>RELIGION OR BELIEF</b></p> <p>We will mitigate any potential equality gaps or issues by capturing the necessary information tailored towards the protected characteristic during the implementation of the PSPO.</p>	<p>To monitor trends and identify positive requirements, including specific engagement with those groups, should there be an overrepresentation of this group who contravene the prohibition.</p>	<p>Simon Egbor</p>	<p>Throughout the duration of the order</p>
<p><b>MARRIAGE &amp; CIVIL PARTNERSHIP</b></p>			

<p>We will mitigate any potential equality gaps or issues by capturing the necessary information tailored towards the protected characteristic during the implementation of the PSPO.</p>	<p>To monitor trends and identify positive requirements, including specific engagement with those groups, should there be an overrepresentation of this group who contravene the prohibition.</p>	<p>Simon Egbor</p>	<p>Throughout the duration of the order</p>
<p><b>AGE</b></p> <p>Additional Support measure would be put in place through prevention and education and sign posting to relevant support service that can offer support</p> <p>Young people will be referred into safeguarding mechanisms and under 18's parent / guardians will be spoken with</p>	<p>To monitor trends and identify positive requirements, including specific engagement with those groups, should there be an overrepresentation of this group who contravene the prohibition</p>	<p>Simon Egbor</p>	<p>Throughout the duration of the order</p>
<p><b>RACE</b></p> <p>The notice will have a clear pictorial representation showing the various prohibitions not permitted in the area to address does that not understand English as their first Language</p> <p>Both the police and council officers undergo diversity awareness training and are aware of their organisation's equal opportunities and diversity policies and procedures</p>	<p>To monitor trends and identify positive requirements, including specific engagement with those groups, should there be an overrepresentation of this group who contravene the prohibition.</p>	<p>Simon Egbor</p>	<p>Throughout the duration of the order</p>
<p><b>SEX</b></p> <p>We will mitigate any potential equality gaps or issues by capturing the necessary information tailored towards the protected characteristic during the implementation of the PSPO.</p>	<p>To monitor trends and identify positive requirements, including specific engagement with those groups, should there be an overrepresentation of this group who contravene the prohibition.</p>	<p>Simon Egbor</p>	<p>Throughout the duration of the order</p>

## SECTION F – SIGN OFF

Please ensure this section is signed and dated.  
07/02/22

<b>OFFICER:</b>	Simon Egbor
<b>REVIEWING OFFICER:</b>	Veronica Christopher
<b>HEAD OF SERVICE:</b>	Colin Wilderspin

	<b>Cabinet</b> 12 September 2022
	<b>Report from the Director Regeneration, Growth &amp; Employment</b>
<b>Draft Church End Growth Area Masterplan Supplementary Planning Document</b>	

<b>Wards Affected:</b>	Roundwood and Willesden Green
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
<b>No. of Appendices:</b>	Two Appendix 1: Draft CEGA Masterplan SPD Appendix 2: Draft Equality Assessment
<b>Background Papers:</b>	<a href="#">Adopted Brent Local Plan</a>
<b>Contact Officer(s):</b> (Name, Title, Contact Details)	<p>Alice Lester, Operational Director Regeneration Growth and Employment 020 8937 6441 <a href="mailto:Alice.Lester@brent.gov.uk">Alice.Lester@brent.gov.uk</a></p> <p>Jonathan Kay, Head of Regeneration 020 8937 2348 <a href="mailto:Jonathan.Kay@brent.gov.uk">Jonathan.Kay@brent.gov.uk</a></p> <p>Ciara Whelehan, Spatial Planning Manager 020 8937 6473 <a href="mailto:Ciara.Whelehan@brent.gov.uk">Ciara.Whelehan@brent.gov.uk</a></p> <p>Bruna Varante, Principal Regeneration Officer 020 8937 61134 <a href="mailto:Bruna.Varante@brent.gov.uk">Bruna.Varante@brent.gov.uk</a></p>

## 1.0 Purpose of the Report

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

## **2.0 Recommendation(s)**

- 2.1 To approve the draft Church End Growth Area Masterplan Supplementary Planning Document (CEGA Masterplan SPD) for publication and statutory consultation.

## **3.0 Detail**

- 3.1 Brent's Local Plan (2019-2041) was adopted in February 2022. The Plan sets out the vision and policies for development in the borough for the next 10 years, which includes the delivery of 23,250 new homes from 2019/20 to 2028/29.
- 3.2 Key to accommodating an increasing population are 8 growth areas, viewed as the most sustainable spatial expression for growth. The Church End Growth Area (CEGA) extends to 26 hectares, comprised of Victorian housing stock, the local town centre and 14 hectares of industrial land allocated for mixed-use regeneration. The Local Plan identifies CEGA to be promoted for mixed-use regeneration set around the economic revitalisation of the local centre and an improved public realm, to improve the area and change the perception of the place to a busy, thriving, safe and secure neighbourhood.
- 3.4 The CEGA Masterplan SPD is a long-term, ambitious and comprehensive plan that will help to secure at least 1,300 new homes and infrastructure to maximise opportunities and wellbeing for local residents, businesses and communities, including the provision of education, health, cultural and community facilities, open space and play facilities.
- 3.5 Since early 2021 officers have worked with appointed consultants to develop the draft CEGA Masterplan SPD. This included extensive engagement throughout 2021, with a range of partners and stakeholders including residents and local councillors, businesses, community organisations, landowners, developers and Transport for London (TfL).
- 3.6 As outlined in the Local Plan, the CEGA Masterplan SPD is required to provide clarity and detailed guidance for new developments, inform the assessment of planning applications, and be a material consideration for future planning decisions in the area. As such, the SPD document sets out a robust urban design framework comprising development, placemaking and environmental and sustainability principles. Together these principles are designed to ensure new development unlocks the potential of the area coherently and comprehensively, creating a place where people choose to live, work and have fun, while also adhering to the highest environmental standards required to support climate change, resilience and transition to net zero carbon. The Council will be expected to review the document every 5 years.
- 3.7 To advance the draft CEGA Masterplan SPD towards adoption, statutory public consultation of not less than 4 weeks is required, however consistent with the approach the Council has taken with other SPDs, it is recommended that the draft CEGA Masterplan SPD is made available for public consultation for a



period of 6 weeks. The draft CEGA Masterplan SPD is presented to Cabinet for approval to that end. Subject to consideration of all consultation representations and any necessary amendments, the final CEGA Masterplan SPD would then return to Cabinet for adoption and publication.

#### **4.0 Financial Implications**

- 4.1 Costs for the CEGA SPD are being met through existing Regeneration budgets.

#### **5.0 Legal Implications**

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

#### **6.0 Equality Implications**

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

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
2. Advance equality of opportunity between people who share a protected characteristic and those who do not.
3. Foster good relations between people who share a protected characteristic and those who do not.

- 6.2 Draft Equalities has been undertaken and is at Appendix 2. Draft Equalities analysis identifies that the CEGA Masterplan SPD and regeneration of the area has the potential for positive equalities impacts for people of all ages, people with disabilities, BAME communities and women. Analysis also identifies some businesses may need to move to alternative premises during redevelopment, and the draft CEGA Masterplan SPD expects new development proposals affecting industrial sites in Church End to include plans to retain local business and employment, with an appropriate phasing and business relocation strategy and mitigation adopted to protect and support businesses to stay local.

#### **7.0 Consultation with Ward Members and Stakeholders**

- 7.1 The Cabinet Member for Regeneration and Planning has been regularly briefed on the development of the CEGA Masterplan SPD.
- 7.2 Ward councillors from the former Dudden Hill, Harlesden and Willesden Green wards were regularly briefed throughout 2021 on public engagement and

development of the draft CEGA Masterplan SPD. Following the boundary changes and local elections 2022, newly elected ward councillors from Roundwood and Willesden Green wards were briefed on the draft CEGA Masterplan SPD.

- 7.3 Consultation with local residents, businesses and communities in Church End over 2021 and 2022 has informed development of the draft CEGA Masterplan SPD. Consultation feedback to date indicates broad support for the draft plan, and a great appetite for change. However feedback also highlights demand that longer term improvements be supported by short-term investment to tackle key issues in the area i.e. deprivation, crime, lack of access to green spaces and affordable housing, some of which is being addressed by the Church End transformation work
- 7.4 Statutory public consultation will provide further opportunities for engagement with partners, stakeholders, local residents, businesses and communities.

## **8.0 Human Resources/Property Implications (if appropriate)**

- 8.1 Regeneration and Spatial Planning teams have developed the draft CEGA Masterplan SPD in-house, building on masterplan work developed by appointed consultants Hawkins Brown, Jan Kattein Architects; PJA Transport Planning; Ramidus, Propernomics, BNP Paribas and Studio Visible 3d.

### **Report sign off:**

**Alice Lester**

Director of Regeneration, Growth and Employment

# Church End Growth Area

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DRAFT MASTERPLAN AND SUPPLEMENTARY PLANNING DOCUMENT (SPD)

V2.9 JULY 2022



Brent

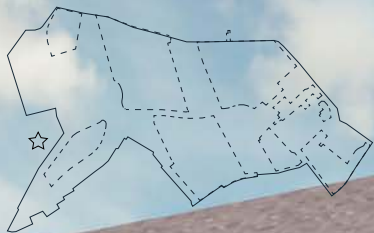
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# Executive Summary

Church End has a rich cultural history, with a diverse community, and legacy of reggae music and sound system culture. Today, although home to a range of industries, it faces challenges including overcrowded housing, a low quality environment, poor health and the recovery from the Covid-19 pandemic.

The area has an appetite for change.

Brent's Local Plan identifies Church End as a Growth Area, which recognises the need for transformational change. The Church End Growth Area Masterplan Supplementary Planning Document (CEGA SPD) sets out the vision and framework to unlock Church End's potential.

Church End will be enhanced as an attractive, prosperous and sustainable neighbourhood. A neighbourhood which celebrates its heritage and the cultural diversity of its existing communities, whilst continuing to welcome new residents and businesses.

Intensification of industrial sites and co-location with residential uses will deliver:

- Fit for purpose industrial spaces for local businesses and emerging sectors including film, music, media and food production;
- Opportunities for employment, skills and training for local people;
- A minimum of 1,300 new high quality homes,

including affordable homes, family sized-dwellings, and specialist accommodation for older people;

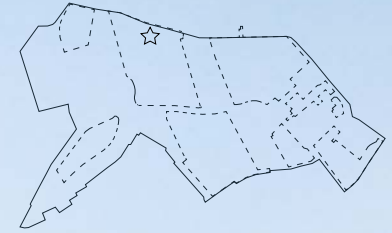
- A revitalised town centre and outdoor market with a diverse offer;
- A range of new community and cultural spaces that support interaction and community cohesion;
- New open spaces, incorporating play for a range of ages including young people and teenagers, alongside opportunities for food growing and access to nature;
- A high quality environment that is safe and accessible to everyone;
- Streets that encourage walking and cycling over private vehicle use, and better connect Church End to the surrounding area;
- A place that achieves the highest standards of sustainability and supports a low carbon circular economy.

The draft Masterplan SPD has been informed by extensive engagement with the community. It will be refined following further consultation prior to its adoption.

The SPD will be used to assess planning applications and inform future planning decisions for development in the area. It will help to ensure that the transformation of Church End brings forward physical, social and economic regeneration for the benefit of all the community.



View BSSA1 - Asiatic Carpets





# About the Document

## Why is this Masterplan needed?

Brent Local Plan identifies Church End as a Growth Area and requires a masterplan to facilitate its regeneration.

The Church End Growth Area (CEGA) Masterplan is needed to:

- Establish the long-term vision, aspirations and objectives for CEGA;
- Bring forward physical, social and economic regeneration for the benefit of all the community;
- Identify and secure community and cultural facilities, green open spaces, employment and commercial uses, transport and other infrastructure to support good growth;
- Provide a clear framework for coherent and comprehensive redevelopment of an area where land ownership is highly fragmented;
- Ensure that the negative consequences of piecemeal development are avoided; and
- Provide a basis for planning decisions.

The masterplan is a Supplementary Planning Document (SPD) to Local Plan policy BSGA1.

## How has the Masterplan been developed?

The Council is committed to effectively engaging with its communities. In developing the CEGA Masterplan SPD the Council aims to ensure transparent communication with local residents, community groups and businesses.

The masterplan designs were informed by a number of engagement activities. These took place with the Church End community from March to December 2021, with a combination of on-line and face to face activities. These events provided useful feedback which is summarised in Appendix C.

Discussions also took place with representatives from the Greater London Authority (GLA), Transport for London (TfL), and other statutory bodies, alongside direct engagement with landowners, developers and local councillors.

## How can I have my say?

The formal statutory consultation process will last six weeks, from **Xth September until Xth October 2022**. This process will provide all stakeholders with another opportunity to provide feedback on the work developed to date. Stakeholders are being invited to participate in different ways, including online and face-to-face.

The draft CEGA Masterplan SPD, along with the comment form and supporting information, will be published on a dedicated web page (**insert URL**) and the Council's **Consultation Hub**. Hard copies will also be available at Brent Civic Centre and local libraries. Finally, the Council will also raise awareness about the document through Your Brent magazine, Council website, social media and other publicity materials.

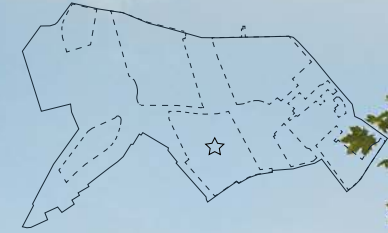
Once consultation has been completed, all comments received will be considered and the SPD amended as appropriate. Once adopted, the finalised SPD will be published alongside an Adoption Statement and Consultation Statement setting out the comments received and the Council's response. These documents will be available to view on the Council's website.

## Who should use the Masterplan SPD?

Applicants seeking planning permission to make improvements to their homes or business premises or those seeking to bring forward new development in the borough; Councillors, supporting their communities to make decisions about new developments; Professionals working on development proposals in the area and Officers guiding regeneration and new development in the borough.



View BSSA2 - New Public Square





# 1.0 Church End Revival

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**Vision**

**Values and Objectives**

## 1.1 Vision

- 1.1.1 Church End Growth Area (CEGA) will be enhanced as an attractive, prosperous and resilient neighbourhood that values and respects existing communities, whilst proactively planning for and welcoming a growing population and future business and employment needs.
- 1.1.2 By 2041 CEGA will deliver at least 1,300 new homes co-located alongside new and refurbished industrial premises. The masterplan will facilitate the delivery of high-quality homes, more business opportunities and jobs, all supported by new infrastructure. Business growth will develop the area's emerging sectors, which includes film and music production, and support the transition to a net zero carbon circular economy.
- 1.1.3 At the heart of the regeneration, an already vibrant town centre will become greener, safer and welcoming to all local residents and businesses, building on the success and offer of the existing outdoor market within a newly designed and publicly accessible market square. Community spaces, a new secondary school, and improved transport infrastructure will complete the area's regeneration.
- 1.1.4 The Covid-19 pandemic has hit Church End hard. Regeneration of the area will include focus on measures that improve the health and wellbeing of local people. A better network of green

infrastructure alongside connected, legible and safe pedestrian and cycle routes will promote a healthy environment for the community to meet, walk, cycle, exercise, play and have fun.

- 1.1.5 In line with the Brent Climate & Ecological Emergency Strategy (2021-2030) new development must support the transition to a net-zero carbon economy, a cleaner and greener environment, and a fairer and healthier society.
- 1.1.6 Change can be unsettling, so change in CEGA must be rooted in meaningful community and businesses engagement. Community involvement and participation within the decision-making process will ensure that regeneration and growth in the area responds and is inclusive of the local community's needs, desires and aspirations.



Credit: Illustration BSSA2 - Hawkins\Brown













Credit: JasonHawkes



A resilient place

- Prosperous, providing training, skills and local employment opportunities
- Provides new and refurbished industrial, workspace and retail floorspace
- Supports local businesses and emerging sectors including film, music, media and food production
- Provides at least 1,300 new high quality homes via sensitive co-location of uses



Credit: Brent Council Image Library



A sustainable place

- Resilient to the impacts of climate change
- Achieves the highest standards in sustainable design and construction
- Achieves net zero carbon
- Promotes a sustainable lifestyle for occupiers
- Supports a low carbon circular economy



Credit: Brent Council Image Library



A characterful place

- Values its distinctive identity
- Celebrates local landmarks and heritage
- Focussed around a revitalised town centre and outdoor market with a diverse offer



Credit: Brent Council Image Library



An inclusive place

- Celebrates its ethnic and cultural diversity
- Supports interaction and community cohesion through a range of new community and public spaces
- Welcoming and accessible to all people
- Represents the needs of children and young people



Hawkins\Brown Masterplan Report



A green place

- Provide a network of green spaces accessible, attractive and well-maintained
- Promotes health and well-being through opportunities to play, exercise, relax and socialise
- Delivers net gains in biodiversity
- Improves air quality and local environment



Credit: Brent Council Image Library



A connected place

- Permeable and integrated with surrounding communities
- Improves links to the nearby Neasden Stations Growth Area
- Promotes walking and cycling, over private motor vehicle use
- Improves accessibility to public transport, including the proposed West London Orbital Station
- Minimises the impact of freight and servicing through a co-ordinated approach



# 2.0 Strategic Overview

- 2.1 Location
- 2.2 Neasden Stations Growth Area
- 2.3 West London Orbital
- 2.4 Policy Context

## 2.1 Location

2.1.1 CEGA is well situated at a key location in west London for industry and production. It is relatively close to other larger industrial clusters such as Park Royal, Staples Corner and Wembley.

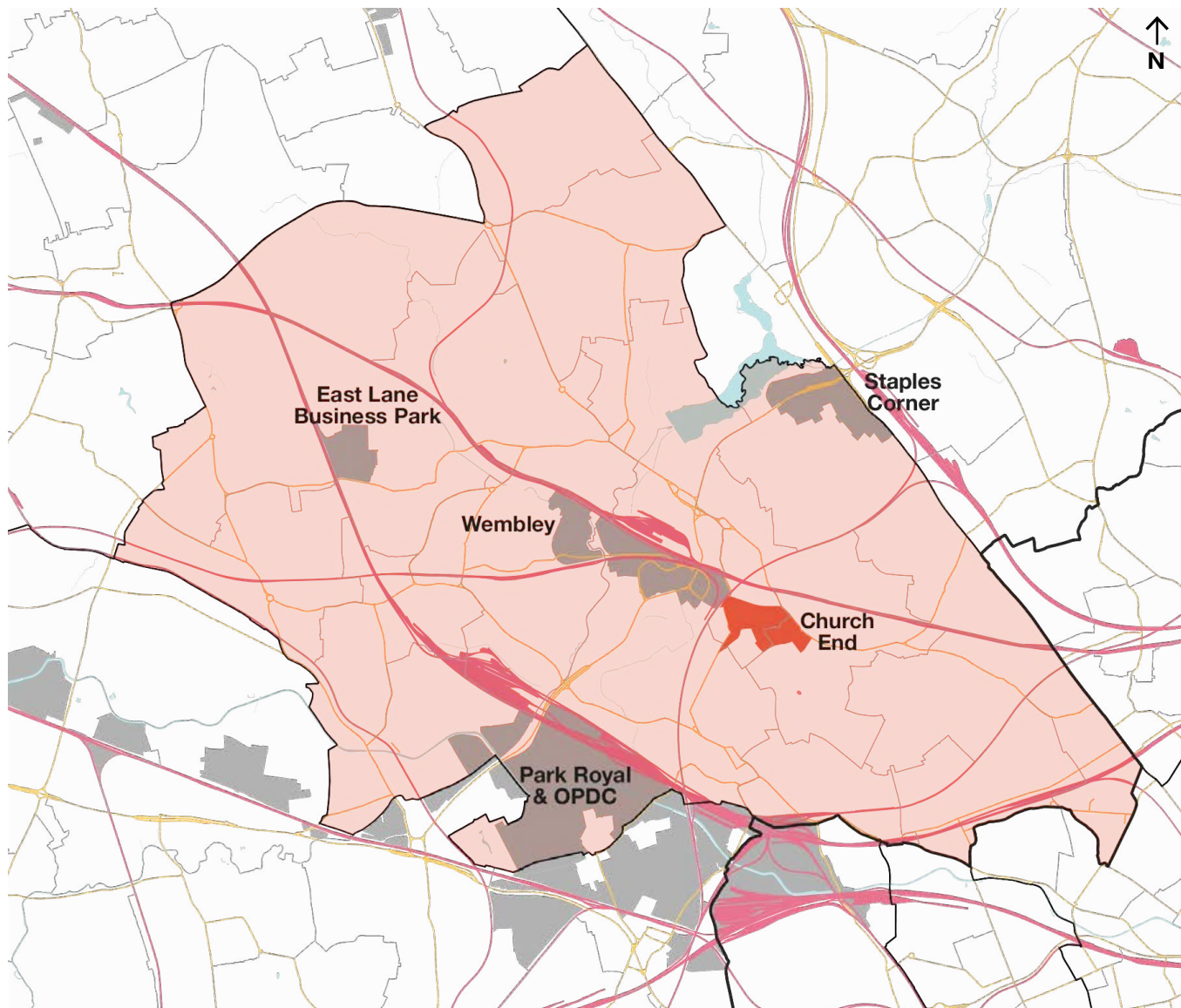


Figure 2 - Diagram indicating CEGA location within London Borough of Brent

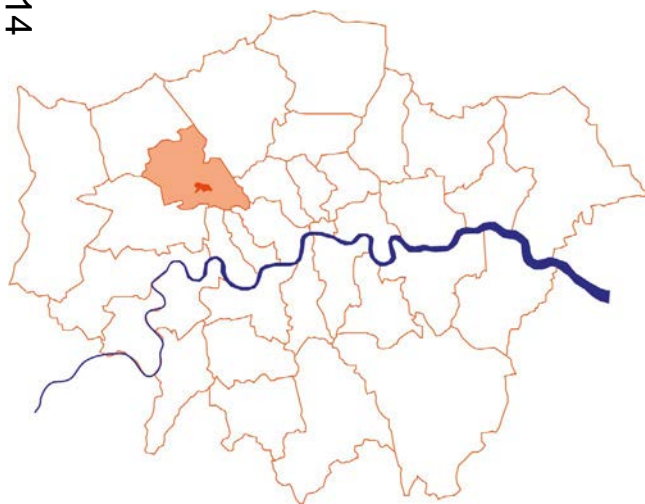


Figure 1 - Diagram indicating CEGA location within London



## 2.2 Neasden Stations Growth Area

2.2.1 CEGA sits immediately south of Neasden Stations Growth Area (NSGA) which aims to provide at least 2,000 new homes, maximising the benefits of transport infrastructure such as the potential West London Orbital (WLO) proposed in the Mayor's Transport Strategy 2018.

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Figure 3 - Neasden Growth Area - Bird eye view

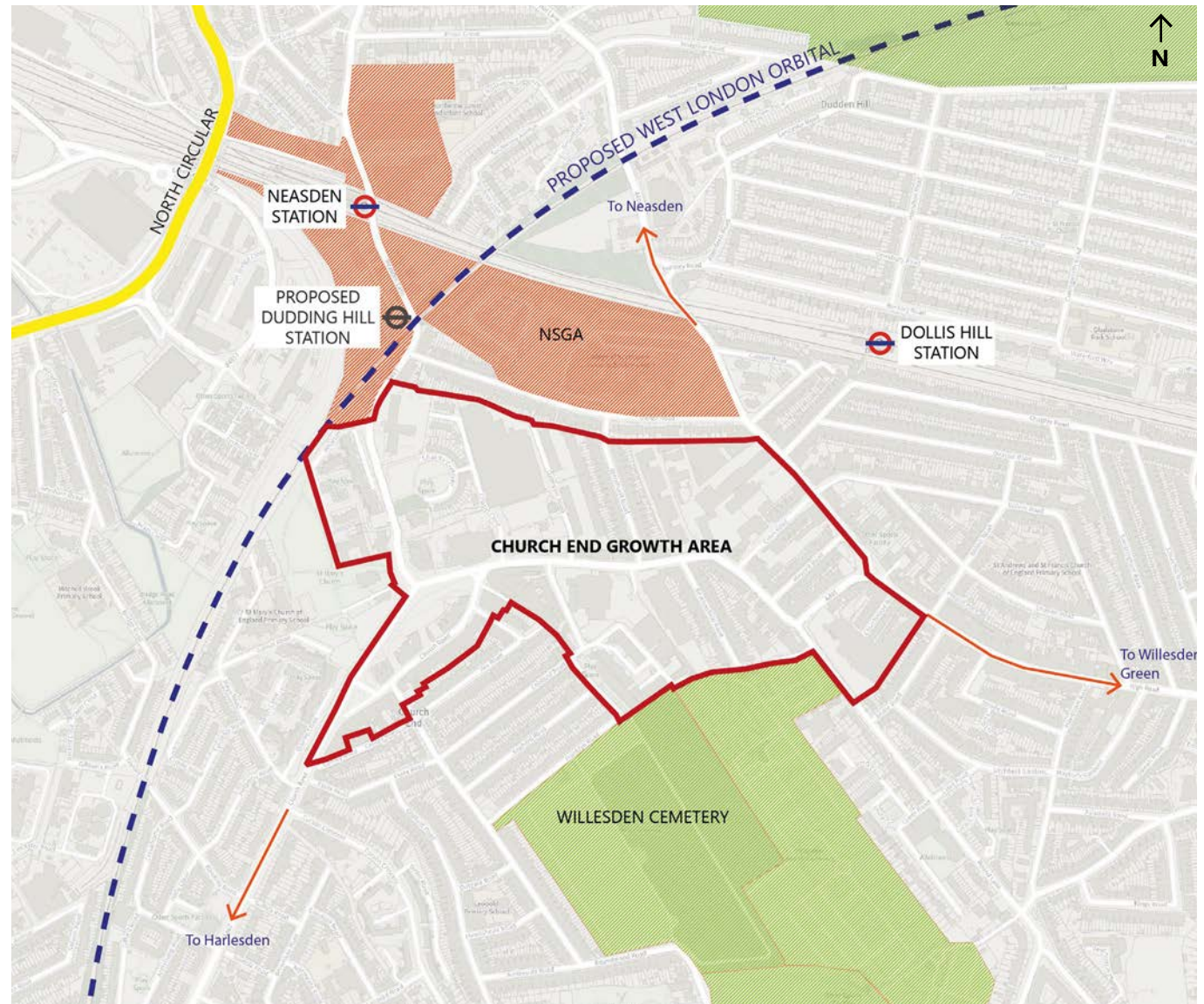


Figure 4 - Map demonstrating the connection between NSGA and CEGA










## 2.3 West London Orbital

2.3.1 Both Neasden and Church End Growth Areas could benefit from the West London Orbital (WLO) route proposed in the Mayor's Transport Strategy 2018. The WLO would reactivate the Dudding Hill freight line to the north-west of CEGA for passenger travel. A new Overground station at Neasden Lane would provide interchange with the Jubilee line. It would also connect to Brent Cross and Old Oak Common and increase the area's capacity to support regeneration and growth. Funding and permission for the WLO is to be confirmed.

2.3.2 The housing numbers and new and intensified employment sites proposed for both NSGA and CEGA, provide the critical mass and opportunity to support emerging employment sectors, cultural and social infrastructure and strengthen pedestrian and cycle connections between the two Growth Areas and beyond.

### Key

-  Opportunity Areas
-  Strategic Interchange
-  Proposed West London Orbital Rail and proposed station
-  Potential West London Orbital Rail and proposed station
-  Existing West London Overground line and Station
-  NSGA
-  CEGA

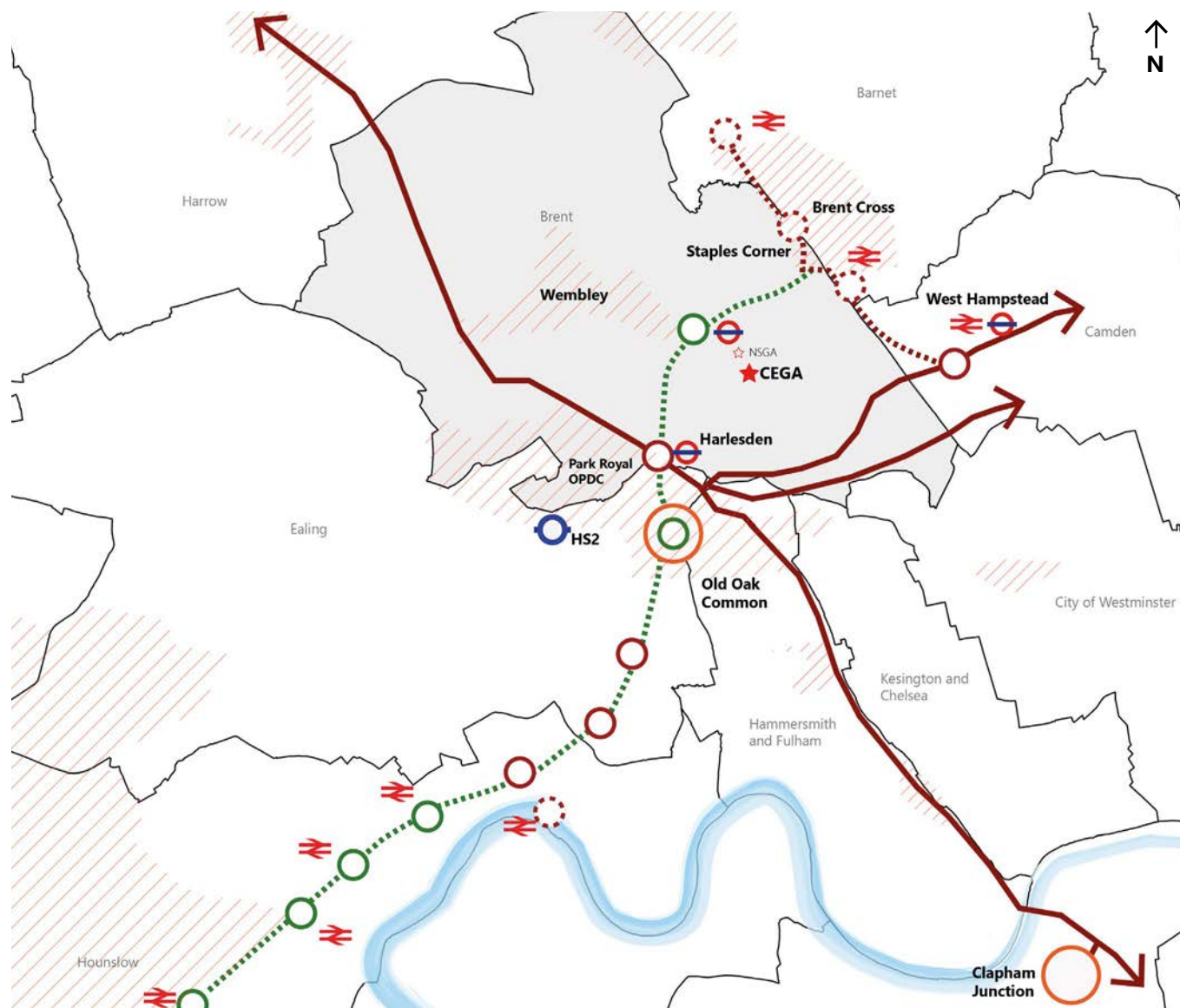


Figure 5 - Map adapted from West London Orbital Proposed Route (Mayor's Transport Strategy 2018)

## 2.4 Policy Context

2.4.1 The London Plan sets Brent a housing target of 23,250 over 10 years (2019/20 – 2028/29). It also recognises the need for sufficient land for a range of industrial, logistics and related uses essential to London's economy, and serve the needs of the growing population.

2.4.2 To meet these competing land pressures, London Plan Policy E7 allows for the intensification of Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) through the co-location of industrial and residential uses. It recognises the need to sensitively manage the interaction between these uses. Policy D13,

on the Agent of Change principle, places the responsibility for mitigating impacts from existing noise and other nuisance generating activities or applicants proposing new noise-sensitive developments.

2.4.3 Brent Local Plan policy BSGA1 identifies Church End as a Growth Area, with potential to deliver over 1,300 homes. Housing will primarily be delivered through co-location and re-provision on Church End's LSIS and local employment sites.

2.4.4 The town centre's southern parade is to be enhanced and historic features restored. Comprehensive development to the northern

parade and car park will deliver a new market square, community and commercial space and housing. To meet industrial needs, Local Plan policy BE3 requires designated industrial sites to intensify, and policy BE3 requires Local Employment Sites to provide the maximum employment floorspace viable.

2.4.5 London Plan policy S1 supports proposals that deliver high quality infrastructure that address a local or strategic need. Brent Local Plan policy BSGA1 sets infrastructure needs for Church End for education, health, cultural and community facilities, open space and play facilities, whilst policy BSI1 protects existing social infrastructure.



Figure 6 and 7 -Church End Car Park redevelopment 99 new Council Homes and a new Market Square. Credit: Wates and Maes Architects

# 3.0 Church End: Evolution and Today

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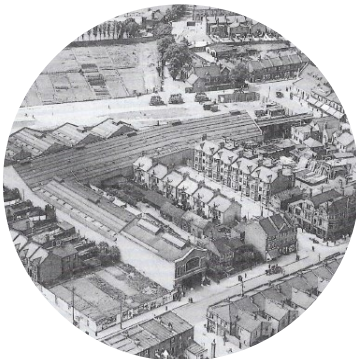
- 3.1 Church End's Historic Development
- 3.2 Challenges
- 3.3 Opportunities



3.1 Church End Historic Development



St Mary's Church, Willesden, in a print by E. Orme, 1799. (Brent Archives online image 703)



An aerial view of Willesden Bus Garage in 1921. (Margaret Pratt, Willesden Local History Society, July 2020)



Scenes from the Dallmeyer optical works, c.1910. (Brent Archives online image 2711)



The Granada Cinema, Church Road, in 1933. (Brent Archives online images 10375)



Aerial view of the British Thomson-Houston factory in Neasden Lane, 1953. (Brent Archives image 2409)



Image Church End, 2019.

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The origins of Church End date back to at least the 12th Century. Church (now St Mary's) first mentioned.

19th century

1866 London & North Western Railway opened Willesden Junction station and ran buses from Church End to meet the trains. Small-scale industry of craftspeople developed and shops started to flourish on Church Road.

1870-90s

United Land Company laid out the Meyrick Road estate. The Jewish Cemetery (1873) and the new Willesden Cemetery (1893) were completed.

1914-1918

First World War – more industry moved to the district.

1930s

Council properties were built north of Denzil Road and at Curzon Crescent. Willesden Technical College opened.

1940s

Despite interwar improvements most of the housing in Church End was thought fit for redevelopment.

1960s

Church End was hit by industrial decline.

1990s

Unemployment was high. In 1998 Brent Council transferred housing estates at Church End and Roundwood to Fortunegate Community Housing. Fortunegate demolished the Church End Resiform Estate and returned the area to a more traditional street pattern.

2000s

Overcrowding started becoming more typical in the area. Somali and Afghan communities arrived complementing existing Irish, Caribbean and Jewish communities.

Find out more about this area by visiting Brent's website and by looking at our local history articles, written by volunteer researchers and members of local history societies: <https://www.brent.gov.uk/services-for-residents/culture-leisure-and-parks/brent-museum-and-archives/find-out-about-your-local-area/history-of-church-end/>

## 3.2 Challenges

3.2.1 An analysis of local data and demographics<sup>1</sup> have highlighted the following:

3.2.2 **Deprivation:** Church End is one of the most deprived areas in Brent and is one of the borough's priority neighbourhoods.

3.2.3 **Crime:** Church End is an anti-social behaviour hotspot, with a concentration of criminal activities per business.

3.2.4 **Employment and skills:** Church End reflects Brent's low 'skills' profile for working-age residents. Over one third of the working-age population falls into the 'skills poverty' category (below NVQ Level 2)<sup>2</sup>.

3.2.5 **Health and well-being:** Reported levels of good health are lower in this part of the borough than elsewhere. Church End was amongst the worst affected areas in the UK from Covid-19, with excess deaths three times the national average, and the Somali community particularly badly hit.

3.2.6 **Open Space Deficiency:** Church End suffers open space deficiency based on GLA's accessibility standards.

3.2.7 The findings below are from engagement activities undertaken with the community throughout 2021. The detailed findings are set out in the Statement of Consultation:

- Residents in the Growth Area are cautious but receptive to change.
- Music is of great importance to the cultural identity of Church End and has the potential to be a catalyst to engage young people.
- The existing high street offer contributes to the sense of belonging of many communities, but it could also better meet wider local needs.
- There is an absence of larger public spaces and play facilities within easy walking distance.
- Any new successful open space must be fully accessible, comfortable, well-kept and secure.
- There are limited neutral community spaces within Church End.
- Spaces for all ages are key to promote community cohesion and tackle social isolation.
- Affordable workspaces can encourage the growth of local creative and entrepreneurial industries.
- Businesses located within the industrial sites are positive about their premises and expectations for growth.

- There is a need for training and employment opportunities, particularly for young people.
- The pandemic has brought about an increased awareness of poor mental health and general well-being.
- Trust, integrity, long-term commitment and local roots will be essential for the creation of successful spaces in Church End.



Figure 8 -Outdoor Engagement Event, May 2021

1 Church End demographics - please see Appendix E

2 LB Brent, adopted Local Plan, 2020



### 3.3 Opportunities

- 3.3.1 Based on the analysis of Church End's past, present and the insight of the community, the following opportunities have been identified:
- 3.3.2 **Appetite for change:** There is an openness for change in Church End. There is an opportunity for development to deliver social benefits through employment opportunities, new community facilities and green spaces.
- 3.3.3 **Strengthen community cohesion:** There is an opportunity for shared spaces to bring together people from different backgrounds to create a more inclusive neighbourhood.
- 3.3.4 **Build on the historic and contemporary legacy of music:** The legacy of reggae and sound system culture is not forgotten in the area, and is translated into contemporary grime, rap and drill. There is a real opportunity to capitalise on this creative talent.
- 3.3.5 **Economic development:** Sectors such as multi-media production, broadcasting, as well as catering and food manufacture all have small-scale bases within the area. Supporting the creation of hubs for these sectors can provide a real boost within the area's economic development.
- 3.3.6 **Church End Local Town Centre:** An intensified and reactivated Town Centre at Church End can diversify its offer to better cater to local needs. This could be through improved public realm focussed around the market.
- 3.3.7 **Strategic developments,** such as the proposed West London Orbital line, and new mixed-use developments at NSGA area anticipated to offer considerable potential benefits for Church End.
- 3.3.8 **Co-location and intensification:** Industrial sites can unlock new employment opportunities for local residents and modern workspace for emerging sectors, as well as delivering new homes.
- 3.3.9 **Sustainable neighbourhood:** Potential to develop a low-traffic neighbourhood that supports walking and cycling. Potential to deliver zero carbon developments and make Church End greener.



Figure 9 - United Borders , local charity working with young people and music production



Figure 10 - Community gathered celebrating cycling

# 4.0 Church End Growth Capacity

4.1  
4.2  
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**Site Allocations**

**The Masterplan**

## 4.1 Site Allocations

4.1.1 The Brent Local Plan envisages development in CEGA will primarily be delivered within nine site allocations. These sites are predominantly industrial sites. This Masterplan SPD provides development design guidance for the six largest site allocations;

- 1 BSSA1 - Asiatic Carpets;
- 2 BSSA2 - B&M Home Store & Cobbold Industrial Estate;
- 3 BSSA3 - Church End Local Centre;
- 4 BSSA4 - Chapman's and Sapcote Industrial Estate;
- 5 BSSA5 - Willesden Bus Depot; and
- 6 BSSA8 - McGovern's Yard.

4.1.2 The additional three site allocations within the CEGA are:

- 7 BSSA9 Barry's Garage: Allocated for mixed-use development with an indicative capacity of 40 homes;
- 8 BSSA12 - 296-300 High Road: Allocated for mixed-use development with an indicative capacity of 8 homes;
- 9 BSSA19 - Chancel House: Construction underway for a 6FE secondary school.

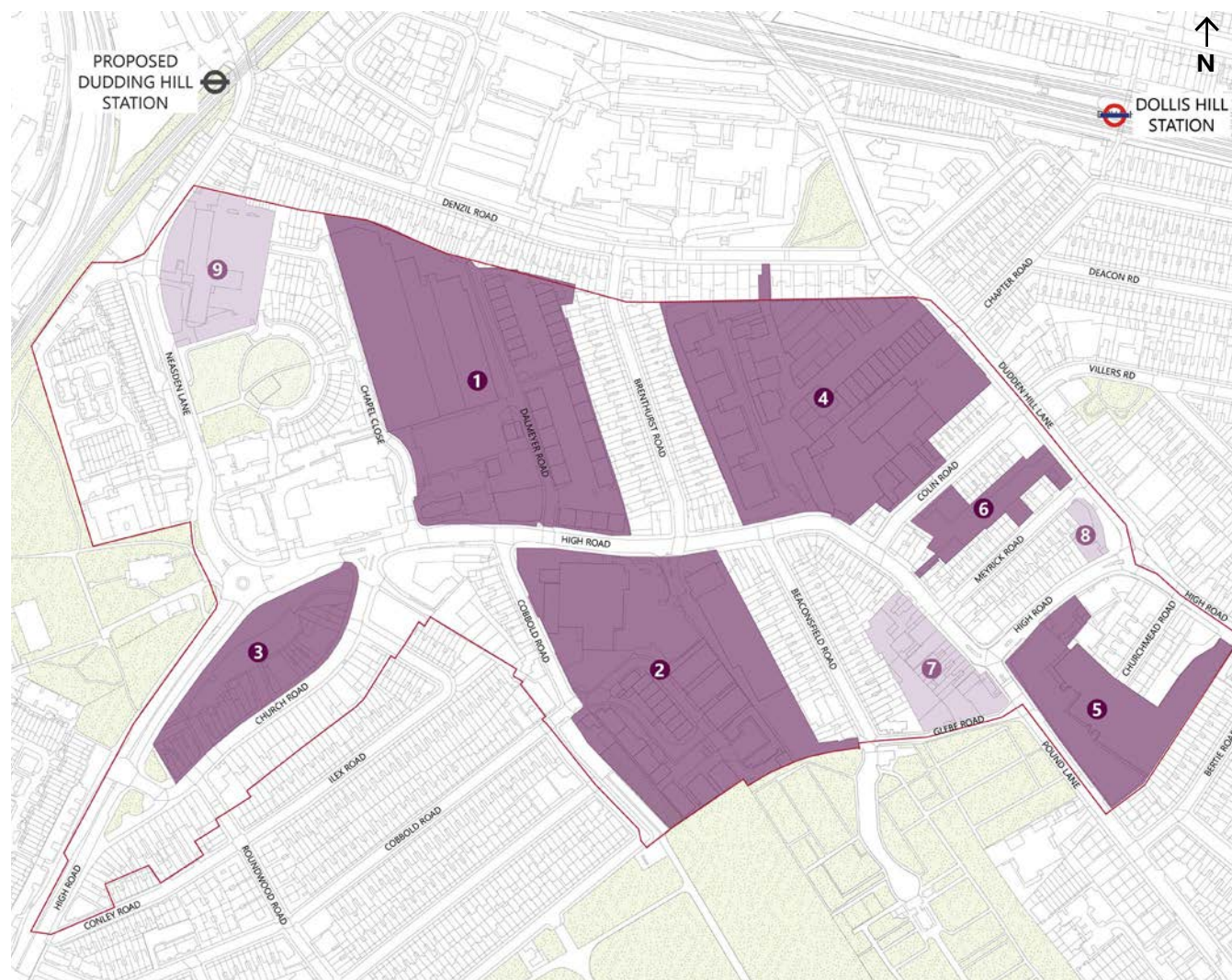


Figure 11 - CEGA Site Allocations. Adapted from Hawkins\Brown Masterplan Report.



## 4.2 The Masterplan

4.2.1 The preferred masterplanning approach allows a phased redevelopment of the site allocations. This approach reflects the policy framework, is informed by engagement with the community and landowners, and has been viability tested. Alternative options were considered, however, the preferred approach represents the best balance between the need to deliver housing and maintain and intensify industrial uses in the area. It is also considered the most deliverable taking into account land ownership and existing occupiers.

### Key

- Site allocations within CEGB part of the masterplan
- 1 BSSA1 - Asiatic Carpets: mixed-use, 414 homes
- 2 BSSA2 - B&M Home Store & Cobbold Industrial Estate: mixed-used, 160 homes
- 3 BSSA3 - Church End Local Centre: mixed use, 193 homes
- 4 BSSA4 - Chapman's and Sapcote Industrial Estate: mixed use, 300 homes
- 5 BSSA5 - Willesden Bus Depot: mixed use, 60 homes
- 6 BSSA8 - McGovern's Yard: mixed use, 45 homes



Figure 12 - Masterplan proposed massing. Adapted from Hawkins\Brown Masterplan Report.

# 5.0 Urban Design Framework

- 5.1 Land Use
- 5.2 Movement and Connectivity
- 5.3 Green infrastructure and Public Realm
- 5.4 Building Design and Architecture
- 5.5 Climate Change and Sustainability



## 5.1 Land Use

### Proposed Framework

5.1.1 The proposed framework aimed to sensitively co-locate homes and industrial floorspace alongside supporting community and cultural facilities, open space and high quality public realm. Through the successful integration of uses the framework seeks to create a sustainable, vibrant mixed-use neighbourhood.

#### Key

- Industrial B2/B8/E - existing
- Shared yard for industrial uses
- E(g) -light industrial
- E(c)/E(g) - Commercial offices, workspace and services
- E(g) - Affordable Workspace
- F - Community and Learning
- E(a)/(b)/(c) and sui generis - Retail, F&B and services
- C3 - Residential
- New green and open spaces
- Public realm
- Proposed servicing route (industrial)
- Proposed servicing route (non-industrial)
- ▲ Main entrance (non-residential)
- △ Residential entrance
- △ Service entrance
- On-street parking
- ▨ Car park (podium/dedicated)
- Existing green amenity (unrestricted use)
- Existing green amenity (restricted use)

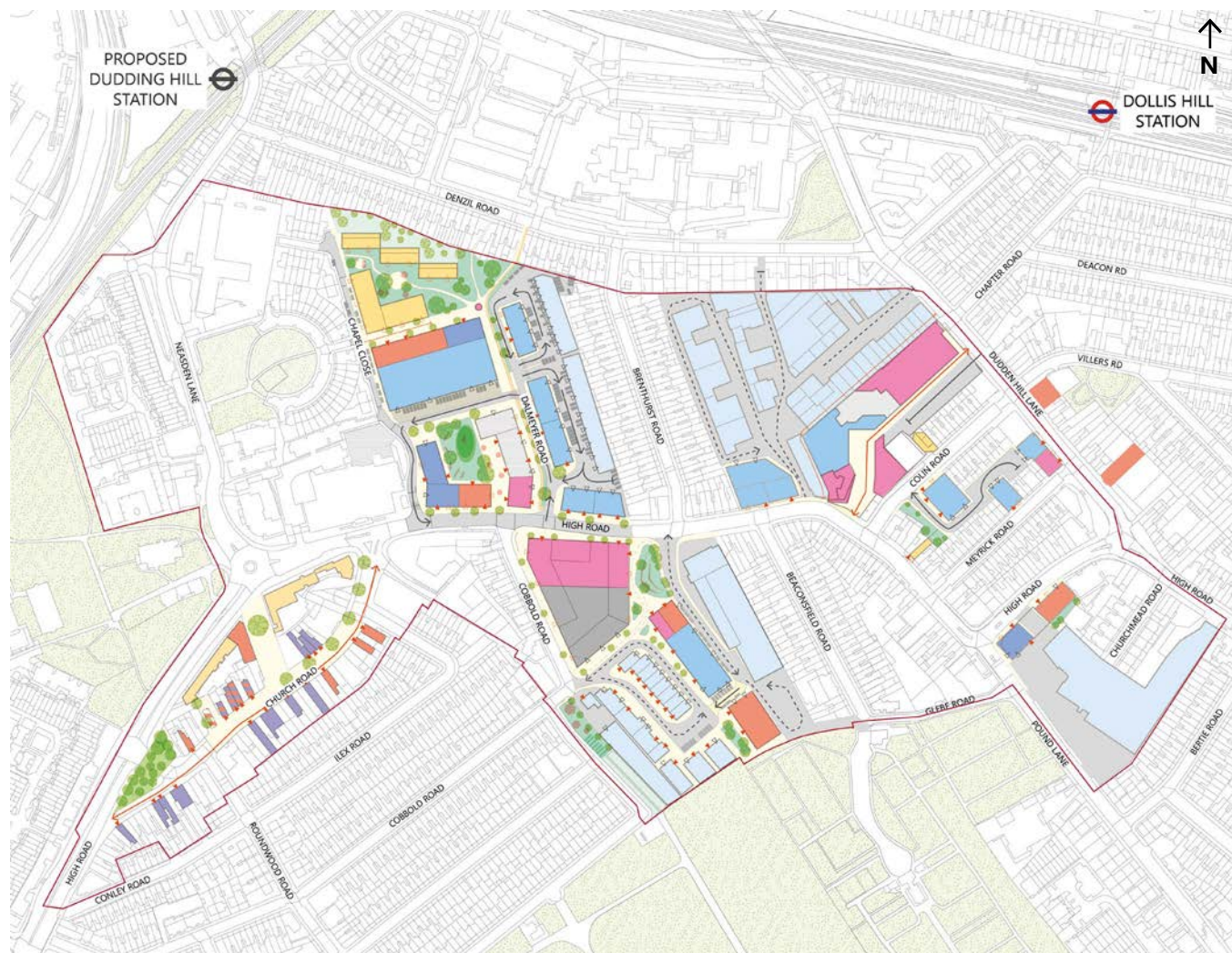


Figure 13 - Proposed Land Use Framework. Adapted from Hawkins\Brown Masterplan Report.

## 5.1 Land Use

### Development Principles

#### Town Centre Uses

- **TCU1 Diverse Uses:** Provide a range of Town Centre uses including retail, leisure, community, workspace and employment uses that retain an active frontage at ground floor and optimise upper floors for housing. (Local Plan policies BSGA1 and BE4)
- **TCU2 Public realm:** Seek opportunities to activate and enhance the public realm, through greening, street art, high-quality street furniture. (Local Plan policy BSGA1)
- **TCU3 Meanwhile Use:** Support the meanwhile use of vacant buildings or land for socially beneficial purposes including community use and workspace until occupied by the intended use. (Local Plan policy BE4 and Brent's Affordable Workspace Strategy)
- **TCU4 Character:** Be sensitive to local character with designs that respect and enhance local distinctiveness. The retention and enhancement of the southern parade of Church Road will be encouraged. Further guidance can be found within the Appendix A. (Local Plan policies BD1 and BE7)

#### Context

5.1.2 Town Centre uses are concentrated around Church Road, which serves as Church End's Town Centre, and along Dudden Hill Lane, a neighbourhood parade to the east. Church End Town Centre predominantly serves a local catchment area.

5.1.3 It has high levels of vacancies and takeaways. Although its retail offer is currently limited, Council redevelopment of the northern side of the Church Road parade and car park will deliver a new market square, community and commercial space, and new housing. This will be a catalyst to improve this area. See page 5.



Figure 14 - Church End Town Centre. Brent Image Library.

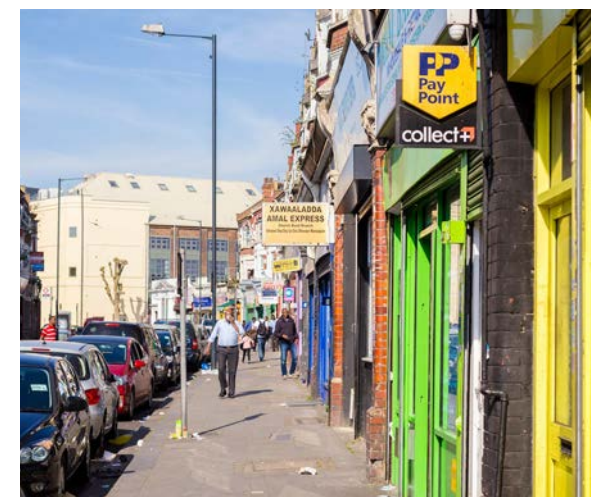


Figure 15 - Church End Town Centre.. Brent Image Library.



## 5.1 Land Use

### Development Principles

#### Industrial & Employment

- **IE1 Intensification:** Maximise industrial floorspace through intensification. On Locally Significant Industrial Sites (LSIS), increase industrial floorspace with a target of achieving a minimum 0.65 plot ratio. (Local Plan policy BE2)
- **IE2 Affordability:** Provide 10% of new industrial floorspace as affordable workspace on LSIS, and provide the maximum viable affordable workspace on Local Employment Sites. (Local Plan policy BE3)
- **IE3 Residential Co-Location:** Deliver industrial spaces that can sit comfortably alongside new housing. Mitigate any potential conflicts between uses and provide a high quality environment for both residents and businesses. (London Plan policy D13)
- **IE4 Floorspace:** Provide a range of high quality industrial floorspace which is fit for purpose and reflective of borough needs, having regard to the site specific clusters and potential for specialisms as identified in the site allocations. (Local Plan policy BE2)

- **IE5 Business engagement:** Proactively engage with existing businesses to seek to retain them on site where possible, and support any businesses that cannot be incorporated to relocate off site. This is to be evidenced through a Business Relocation Strategy.
- **IE6 Local opportunities:** Support economic growth by creating and promoting opportunities for employment, skills and training development for local people particularly in emerging sectors. (Local Plan policy BE1)

#### Context

5.1.4 Most of Church End's industrial stock is within designated Locally Significant Industrial Sites (LSIS). 30,000sqm employment space, accommodating around 60 businesses and approximately 500 jobs across a variety of business sectors. The top three uses are: wholesale (24%), vehicle sale & repairs (17%); and manufacturing (10%).

5.1.5 Church End, as with Brent as a whole, is represented in sectors more at risk of automation and changes in technology and patterns of trade.

There is a need to enable future growth sectors such as the low carbon circular economy, science and technology, creative industries and food production. There is also a real need to increase employment levels and job quality.

5.1.6 Affordability is a key draw for businesses in Church End. Brent's Affordable Workspace Strategy and Action Plan (2020) identifies additional need for Incubator, Accelerator and Co-working space, cluster spaces for creative industries like film and music to build on existing workspace infrastructure, and makerspace.



Figure 16 - View of Neasden Studios from Chapel Close. Hawkins\ Brown Co-Location Study



## 5.1 Land Use

### Development Principles

#### Housing

- **H1 Housing target:** Delivery of at least 1,300 new high quality homes co-located with industrial uses, by meeting or exceeding the identified site specific indicative residential capacity set out in Figure 12. (Local Plan policy BSGA1)
- **H2 Housing mix and tenure:** Create mixed, balanced and tenure blind housing to meets a range of identified local housing needs. A minimum of 35%, and when viable 50%, of new homes are to be affordable, with a tenure split of 70% Social Rent/London Affordable Rent and 30% intermediate (London Living Rent, affordable rent within London Housing Allowance limits and London Shared Ownership), and a minimum of 25% of new homes as family-sized dwellings (3 bed+). Early engagement with a Registered Provider is encouraged. (Local Plan policy BH5 & BH6)
- **H3 Specialist accommodation:** Deliver specialist older people's accommodation as a minimum of 10% of additional dwellings, over those with planning permission, across CEGA. The preferred sites with potential to

support provision are BSSA1 Asiatic Carpets site and BSSA2 B&M Home store and Cobbold Industrial Estate. (Local Plan policy BH8 )

- **H4 Quality:** Deliver homes which promote health and well-being by providing quality internal and external amenity, good solar exposure, dual aspect units, etc. (London Plan policy D6, Brent Local Plan policy BH13)
- **H5 Residential Co-location:** Deliver new housing that can sit comfortably alongside new industrial spaces. Mitigate any potential conflicts between uses and provide a high quality environment for both residents and businesses. (London Plan policy D13)
- **H6 Accessible and adaptable housing:** Provide at least 10% of dwellings to meet Building Regulations requirement M4(3) 'wheelchair accessible standard' and the remainder to meet M4(2) 'accessible and adaptable dwellings.' (London Plan policy D7)

#### Context

5.1.7 CEGA's housing stock is predominantly terraced housing, much of which has been subdivided or converted to Houses of Multiple Occupation. Overcrowding is an issue in Church End, as it is in Brent generally. The delivery of at least 1,300 homes will help address local and borough wide needs for housing, including affordable housing, specialist housing and family sized homes.



Figure 17 - North West Quarter - South Kilburn. Brent Image Library

## 5.1 Land Use

### Development Principles

#### Community & Cultural

- **CC1 New facilities:** Provide a range of new high quality, accessible, multi-functional community facilities, in accordance with Figure 13 as follows:
- BSSA1 Asiatic Carpets - a community space linked to the existing arts and film production function and dedicated space to serve young people. A community facing function for the Probation Service is also encouraged, should it remain on site.
- BSSA2 B&M Home Store and Cobbold Industrial Estate - space for primary, community, mental health care. Should premises not be required by the Clinical Commissioning Group, an alternative community space should be provided on site and a health focus will be encourage.
- BSSA3 Church End Local Centre - small scale community spaces through reactivation of vacant or underutilised units.
- BSSA4: Chapman's and Sapcote Estate - Workspace providing business support.
- BSSA5: Willesden Bus Depot - retention of a pub

or alternative community function through meanwhile use and permanent reprovision within the redevelopment of the vacant Crown Public House. (Local Plan policy BSGA1).

- **CC2 Co-design:** Seek to engage local people, including young people, in the development and on-going operation of community space. Community Use Agreements will be secured to ensure community benefits are maximised including, where space is linked to a cultural or employment use, through training opportunities. (Local Plan policy BSI1, BE1).
- **CC3 Existing Uses:** Protect, retain and enhance existing community facilities, which are meeting a local need. (Local Plan policy BSI1).

#### Context

5.1.8 Brent Infrastructure Delivery Plan (2019) identifies the need for community facilities to support the new and existing community within the Growth Area, including new space to serve as a multi-use community centre, workspace, a health dedicated

facility, and 6FE (form of entry) secondary school and college. The new secondary school and college is already being built at Neasden Lane.

5.1.9 The Growth Area spans areas with diverse communities with different identities. Much of the existing community space is linked to particular religious groups, and there is a lack of space where all sections of the community can come together. There is also a lack of dedicated space and facilities for local young people. The council has ambitions for an OnSide Youth Zone to support the empowerment of young people in the borough.



Figure 18 - New Secondary School and College at Neasden Lane/ Planning Application CGI.



## 5.1 Land Use

### Existing Framework

#### Key

- E(a) Display or retail sale of goods, Wholesale
- E(b) Sale of food and drink for consumption
- E(c)ii Provision of professional services
- E(e) Provision of medical or health services
- E(f) Crèche, day nursery or day centre
- E(g)(i) Offices operational or administrative functions
- E(g)(iii) Industrial processes formerly
- B1(c)light industry
- B2 Use for industrial process
- B8 Storage or distribution
- C1 Hotel
- C2 Residential Institution
- C3 Dwelling Houses
- F1(a) Provision of education
- F1(f) Public worship or religious instruction
- F1(g) Law courts
- F2(b) Halls or Community meeting places
- Pubs
- Hot food / takeaways
- Betting shops
- Taxi business
- Scrapyard
- Petrol station
- Vacant
- Under construction
- Unknown
- Neasden Stations Growth Area (NSGA)
- Church End Growth Area (CEGA) boundary
- Site Allocation boundary
- Existing Green Spaces

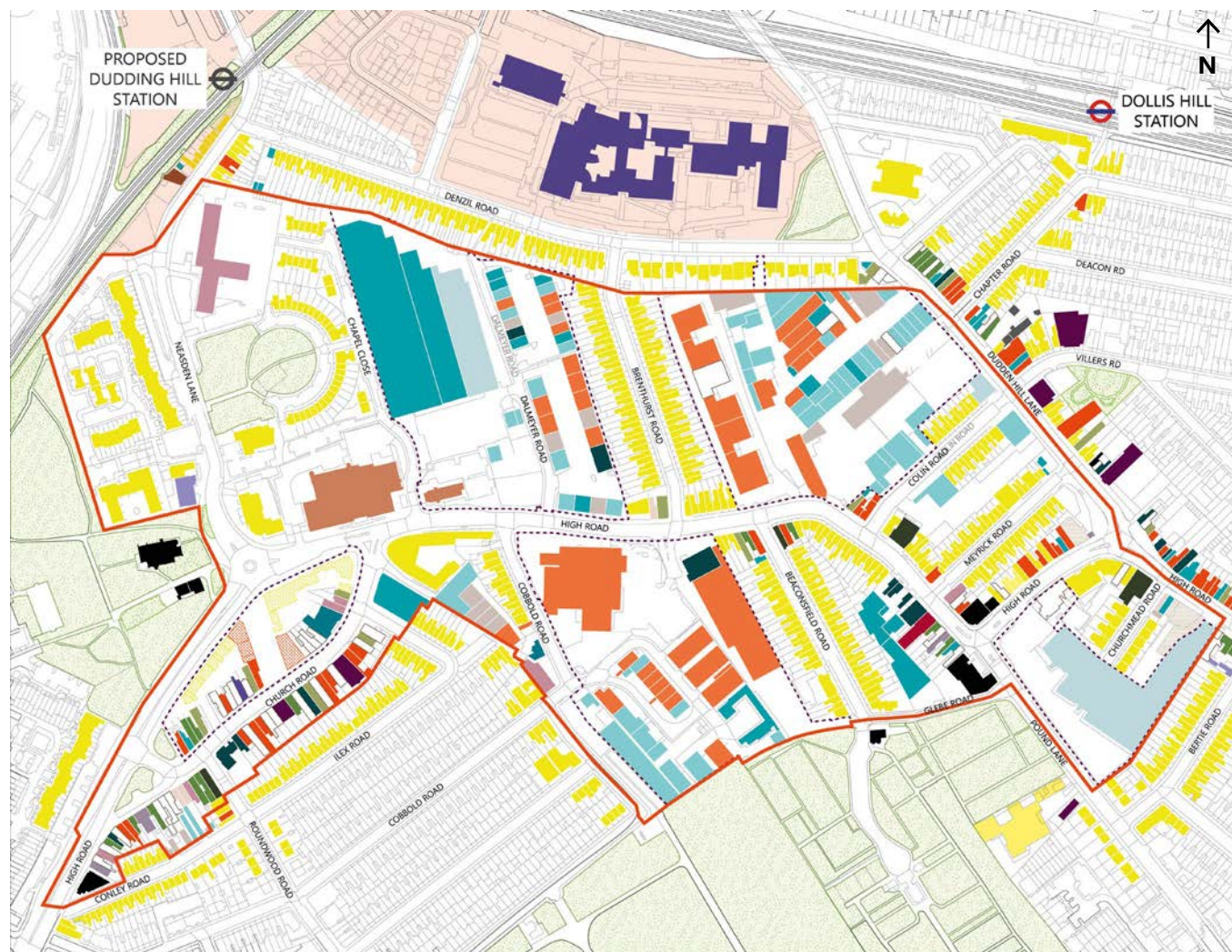


Figure 19 - Land Use based on street view survey [images: 2019] and Hawkins\Brown Church End Industrial Intensification and Co-location study, 2020  
NOTE: these do not account for new vacancies and changes in use as a result of Covid-19



## 5.2 Movement and Connectivity

### Proposed Framework

5.2.1 The proposed framework establishes a clear and cohesive street hierarchy. This approach aims to promote active and sustainable travel choices; promote permeability and connectivity with its surroundings; and improve servicing arrangements for industrial and commercial uses, whilst protecting residential amenities.

5.2.2 In order to support this framework, a number of interventions have been identified. Proposed interventions on Figure 30 include upgrades to existing junctions and crossings facilities; new crossing facilities to connect with local desire lines; new cycle facilities; and Liveable Neighbourhood schemes.

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Key

- Key junction
- Dual carriageway
- Strategic Connector
- City Hub Boulevard
- Local Street
- Industrial/Residential Mix
- Green Route
- Pedestrian Link
- Industrial/Servicing yard
- City Place

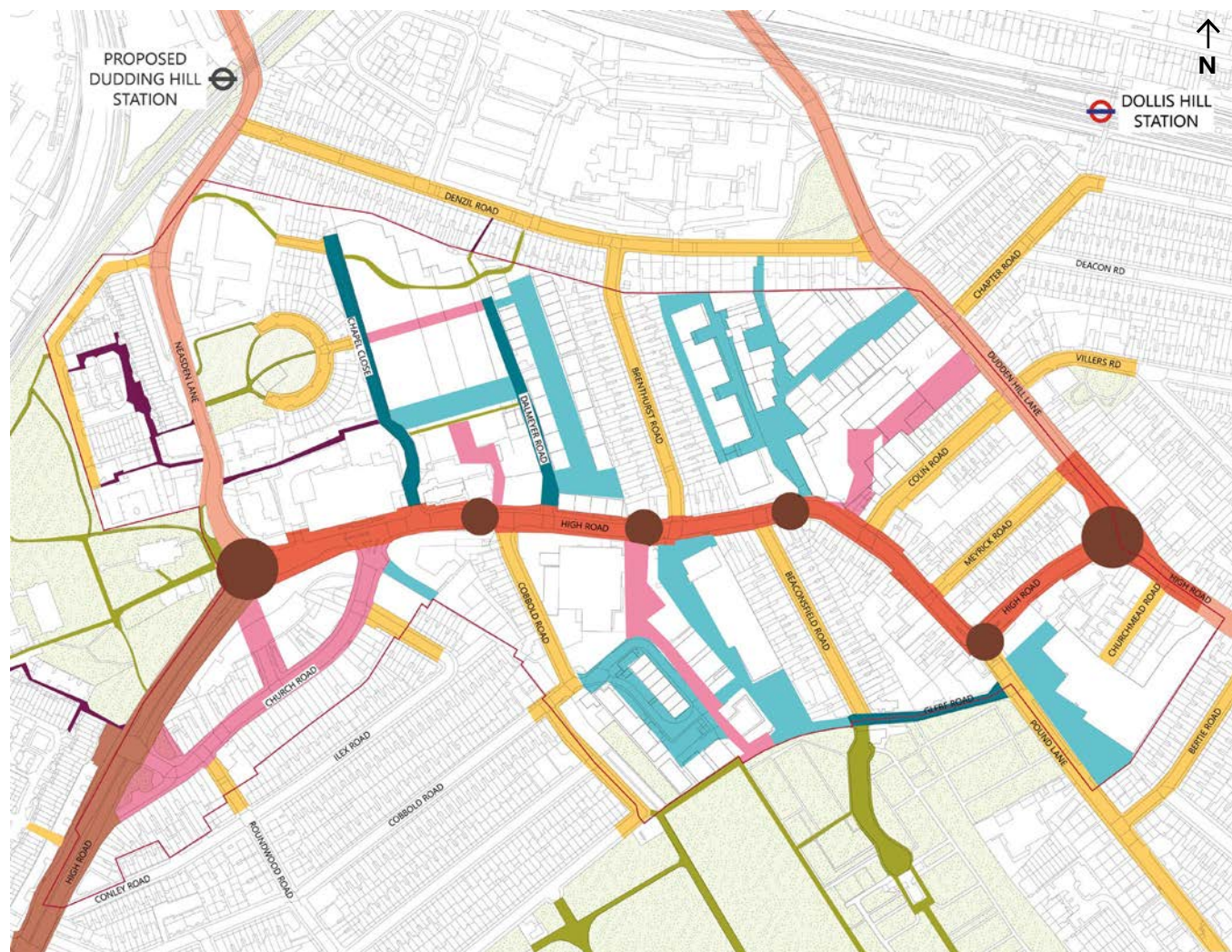


Figure 20 - Proposed street hierarchy. Adapted Hawkins\Brown Masterplan Report



5.2 Movement and Connectivity

Proposed Framework

Street Hierarchy

Dual Carriageway

Approximately 22-24m. Footway min 2m // Cycle Path min 2m // Carriageway min. 3m per lane // Buffer min 1m // Should provide: Street lighting facing both footway and carriageway; Legible London and other formal wayfinding towards stations, nearby parks and key landmarks; Low-level grasses and planting to provide buffer between carriageway and footways; Potential for reduction of carriageway lanes, additional trees, cycle parking, seating & play, rain gardens and Sustainable Urban Drainage (SuDs).



Figure 21 - Kelham Island, Sheffield. Hawkins\Brown Masterplan Report

Strategic Connector

Approximately 12-15m. Footway min 2m // Cycle Path min 2m // Carriageway min. 3m per lane // Should provide: Street lighting facing both footway and carriageway; Legible London and other formal wayfinding towards stations, nearby parks, key landmarks and Town Centres; Safe and overlooked cycle parking; Opportunities for greening vertical surfaces.



Figure 22 - Borough High Street, London Bridge. Hawkins\Brown Masterplan Report

Local Street

Varied widths Footway min 2m // Carriageway min. 3m // Should provide: Lighting to prioritise footways; Clear sightlines to landmarks and informal wayfinding; Potential for small-scale community interventions and opportunities for growing; Raised table at junctions (particularly with strategic connector / dual carriageway).



Figure 23x - Mini Holland Scheme, Walthamstow. Hawkins\Brown Masterplan Report

Industrial / residential

Approximately 18m+. Footway min 2m // Cycle Path min 3m (two-way)// Buffer min 1.5m // Carriageway min. 3.5m per lane Should provide: Street lighting facing both footway and carriageway; Clear formal signage for the industrial estates; Clear wayfinding for pedestrians and cycle connections; Green buffer between servicing routes and pedestrian cycle infrastructure, consisting of low level planting and trees.



Figure 24 - San Sebastien. Hawkins\Brown Masterplan Report

City Hub / Boulevard

Approximately 18-20m. Footway min 2.5m // Buffer min 1m // Cycle Path min 2m // Carriageway min. 3m per lane // Should provide: Feature street trees as buffer and green landmarks; Street lighting facing both footway and carriageway and potential downlighters for trees; Legible London and other formal wayfinding towards stations, nearby parks, key landmarks and Town Centres; Seating and spill out from adjacent ground floor uses; Safe and overlooked cycle parking.



Figure 25 - Constitution Avenue, Canberra. Hawkins\Brown Masterplan Report

City Place

Min. 8m. Footway min 2m // Pedestrian priority/shared surface min.3m per lane// Should provide: Street trees and low level planting; Legible London and other formal wayfinding; Lighting to prioritise footways; Benches Seating and spill out from adjacent ground floor uses; Safe and overlooked cycle parking.



Figure 26 - New Road, Brighton. Hawkins\Brown Masterplan Report

Pedestrian link

Varied widths. Should provide: Playful feature lighting; Seating; Potential for greening and small-scale SuDs interventions; Informal wayfinding; Public art and murals.



Figure 27 - Water Channels. Hawkins\Brown Masterplan Report

Green Route

Varied widths. Should provide: Playful and feature lighting; Seating; Greening, SuDs and intensive landscaping; Informal wayfinding; Public art and play interventions.

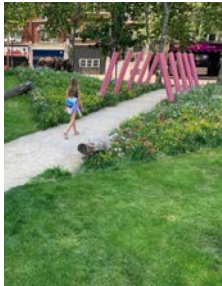


Figure 28 - Sawyer Street. Hawkins\Brown Masterplan Report

Industrial yard

Approximately 15m+. Footway min 1m // Car parking / Loading / Servicing Should provide: Building-mounted lighting for yard space; Green buffer where residential or commercial service uses face yard; Potential for timed alternative uses depending on industrial activity of yard; Clear signage for industrial units.



Figure 29 - Ravenswood Yard, Walthamstow. Hawkins\Brown Masterplan Report



## 5.2 Movement and Connectivity

### Proposed Interventions

#### Key

- Streetscape Improvements: lighting, pavement, greening
- 1.1 Church Road + Market day closures
- 1.2 Cobbold Rd/Franklyn Rd
- 1.3 Beaconsfield Rd
- 1.4 Dollis Hill Station / Chapter Road
- 1.5 Dalmeyer Rd/Denzil
- 1.6 Neasden Ln
- 1.7 High Road
- 1.8 Neasden Station Public Realm
- 1.9 Colin Road

#### Crossing Improvements

- 2.1 Roundabout A407 (High Road) and B453(Neasden Ln)
- 2.2 Church Rd/High Road: Upgrade to toucan crossing
- 2.3 High Road/Mayo Road: Upgrade toucan crossings
- 2.4 Dalmeyer/High Road: Install zebra crossing at junction
- 2.5 Pound Lane/High Road: Install controlled crossings
- 2.6 Bus gate on High Road to remove general traffic
- 2.7 Dudden Hill/High Road: Straight-ahead crossings
- 2.8 Dudden Hill: New crossing to connect with Station
- 2.9 Chancel House Secondary School: install new crossing
- 2.10 New crossing High Road/ Colin Road
- 2.11 Improvement to existing crossing ->Brent Mencap

#### Cycleway Improvements

- 3.1 High Road: Install protected cycle facilities
- 3.2 Church End Road/High Road: : cycle lane and facilities
- 3.3 High Road: cycle lane and facilities
- 3.4 Neasden Ln: cycle lane and facilities
- Dudden Hill: : cycle lane and facilities

#### Low Traffic Neighbourhood Cells

- 4.1 Denzil Road
- 4.2 Roundwood Park
- 4.3 Denzil Road
- 4.4 Roundwood Park

- Church End Growth Area (CEGA) boundary
- Site Allocation boundary

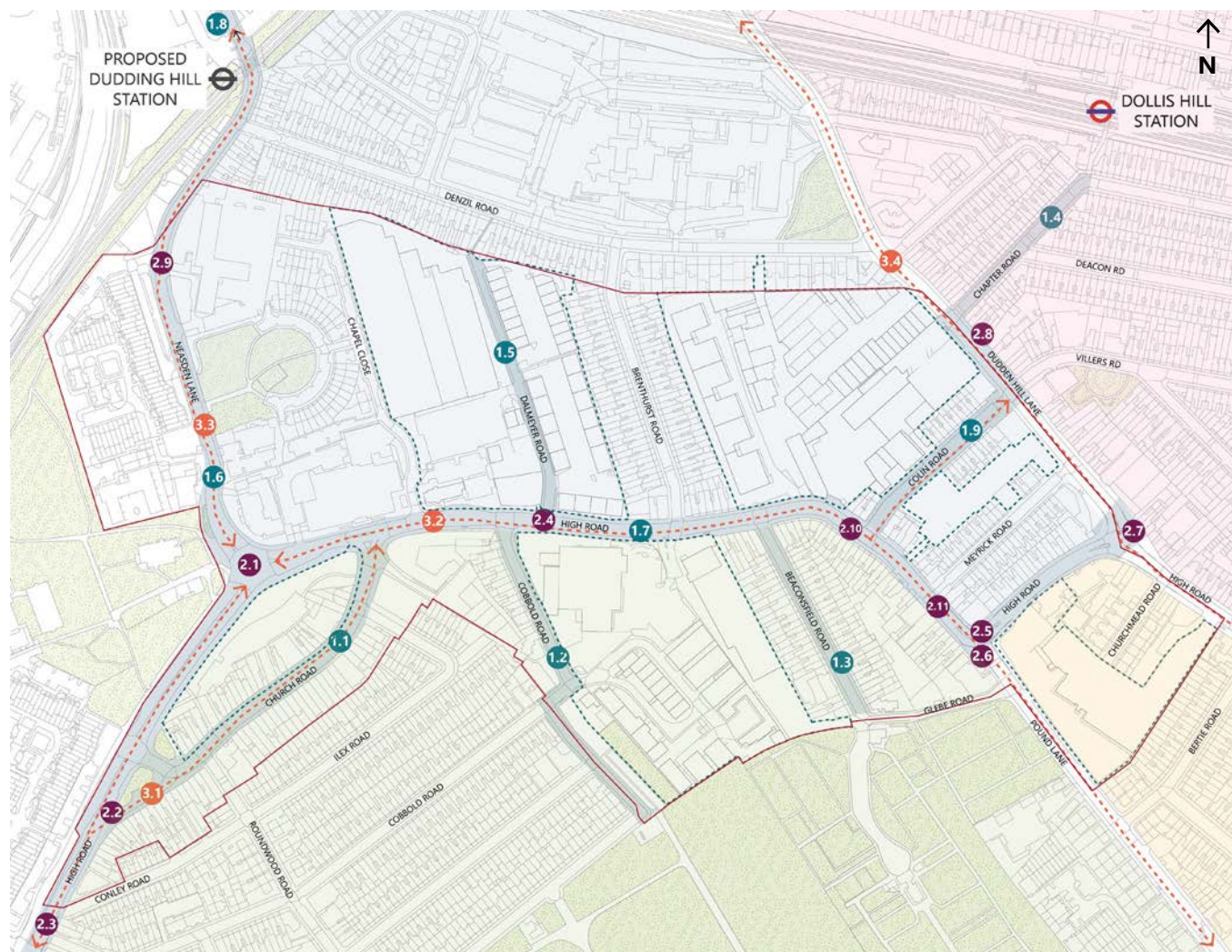


Figure 30 - Proposed infrastructure projects. Adapted Hawkins\Brown Masterplan Report



## 5.2 Movement and Connectivity

### Proposed Interventions

5.2.3 For Church End Town Centre, two options have been identified to create an improved environment. These interventions will be further developed through engagement with the community and TfL.

- **Option 1** - Create a low-traffic environment on Church Road: The proposal would restrict through traffic along Church Road between Ilex Road and Roundwood Road. Only London buses could travel through this section. Daytime servicing and loading for local businesses would be restricted to early morning and from early evening. Bus stops would be relocated to each end of Church Road.

**Option 2** – Recreate the historic alignment of Church Road: The two green spaces would be joined to form a public square whilst businesses at the western end of the high street would retain access to servicing and loading facilities.

#### Key

- Restricted through traffic along Church Road
- New public square
- Historic alignment of Church Road

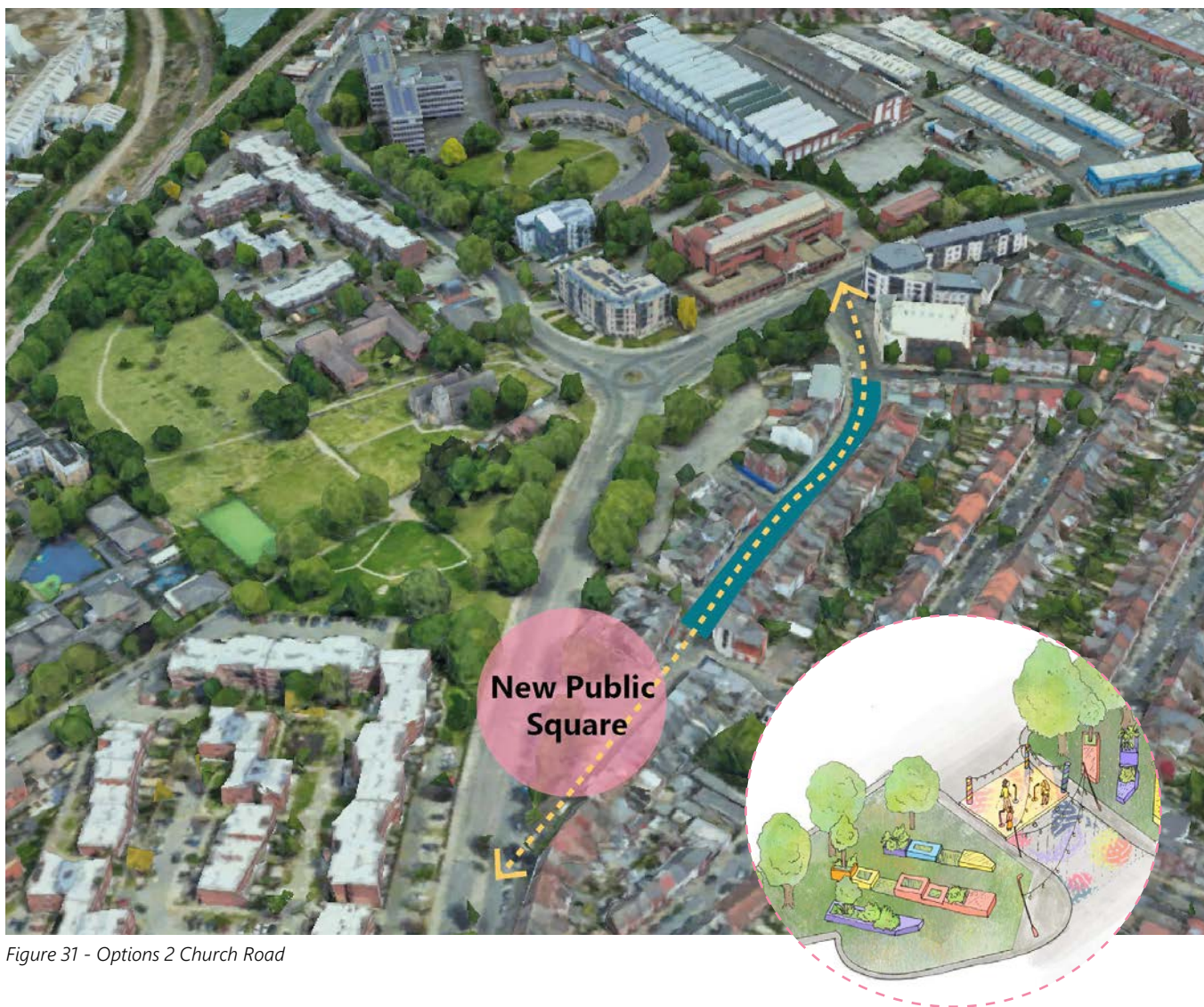


Figure 31 - Options 2 Church Road

## 5.2 Movement and Connectivity

### Proposed Interventions

#### Active Travel

- **AT1 Active Travel:** Development should prioritise active, efficient and sustainable transport choices, contributing to the recommendations in Figure 30. Conditions and connectivity for pedestrians and cyclists should be improved to key destinations including public transport stations and Church Road Town Centre. (Local Plan policy BT1)
- **AT2 Healthy streets:** A 'Healthy Streets' approach, as set out in the Mayor's Transport Strategy, will contribute to make the area safer, greener and more inclusive. Development should be consistent with the street hierarchy in Figure 20. (London Plan policy T2)
- **AT3 Wayfinding and public art:** Public realm should integrate public art at gateway locations and more incidentally at a neighbourhood level, with the involvement of the local community. Signage and wayfinding to key destinations should use Legible London signage and be clear to overcome language barriers. (London Plan policy D8)
- **AT4 Cycling:** Developers should support the creation of new east-west and north-south

cycle routes across CEGA. High quality, safe, secure cycle parking and storage facilities are to be provided on the routes as well as within buildings. (Local Plan policy BT1)

#### Context

5.2.4 The Covid-19 pandemic has dramatically changed the way in which people choose to travel across Brent and London as a whole. Initially, more people walked and cycled. However, latterly more journeys are taken by private car, suggesting former commuting patterns might re-establish themselves.

5.2.5 The majority of key destinations including the underground stations, are within a short 400m (approx. 5 mins) walking distance of the centre of CEGA. Although pedestrians have a variety of route options, they are often of poor pedestrian amenities. Principal challenges identified include:

- High Road between Neasden Lane and Pound Lane: Currently dominated by traffic. It has the potential to re-connect Church Road High Street with the eastern section of High Road towards Willesden Green in the form of a continuous high street.

- Neasden Lane and Dudden Hill Lane: pedestrians and cyclists share routes alongside large flows of vehicular traffic.
- Severance: Onward connectivity is limited by the presence of physical barriers, such as railway lines with few crossing points.
- Wayfinding: Church End can be a difficult area to navigate because of its absence of clear wayfinding or signage.
- Crossing points: There is a lack of formal, signalised and convenient pedestrian crossings on desire lines and particularly at major junctions.
- Cycling: There is limited cycling infrastructure within CEGA, and this includes cycle routes, racks and storage. The only dedicated cycle route is a 250m section of the High Road below the junction with Neasden Lane. London Cycle Network (LCN) Routes 47 and 48 are signposted through the area. Faded line markings and narrow sections add to the sense of poor provision and amenity.



## 5.2 Movement and Connectivity

### Proposed Interventions

#### Traffic Management

- **TM1 Transport impacts:** Development should be underpinned by a robust Transport Assessment and Travel Plans to mitigate and manage transport impacts. (NPPF)
- **TM2 Car ownership and parking:** Reduce travel by private car through car-free or car-lite development supported by provision for shared mobility including car clubs. Provision must be made for charging electric or Ultra-Low Emission vehicles. (Local Plan policy BT2)
- **TM3 Logistics:** Development should be informed by Delivery and Servicing Plans. These should balance providing adequate access and servicing arrangements for industrial/commercial uses and residents whilst protecting amenity. Technical innovation to consolidate delivery and construction transport is encouraged, including provision for electric vehicles. (Local Plan policy BT3)

#### Context

5.2.6 Church End is well served by the Strategic Road Network. The study area is flanked by Neasden Lane and Dudden Hill Lane. Neasden Lane serves as the main access from and to the North Circular Road (A406), whilst Dudden Hill Lane provides an alternative route from the East. Both provide strategic connections from the south of the Borough and converge at the Grange Gyratory, to the north of Neasden Station. The historic High Road (A407) then provides the east-west connection. All routes carry strong traffic flows and impact upon the quality of the environment in CEGA.

5.2.7 Proximity to the North Circular Road makes the area attractive to a variety of industries. Existing land uses, including light industrial and warehouse units, increase the proportion of trips by large vehicles into the study area. This further exacerbates the impact on the road network. Heavy Goods Vehicles (HGVs) on some residential streets also contribute a cluttered, dirty and dangerous environment.

5.2.8 Despite low car ownership and relatively good Public Transport Accessibility Levels across the

area, parking pressures on local streets can be high, particularly in Church End Town Centre. These pressures are closely linked to specific activities, such as market day or Friday prayers. Church End Town Centre can suffer from high levels of car parking contraventions, particularly double parking. At times this causes delays to bus services. Spaces are also used by businesses meaning customers can find it difficult park near businesses or venues.



Figure 32 - Church Road during Market Days

5.2 Movement and Connectivity

Existing Framework

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- Tube station
  - Proposed WLO Overground Station
  - Bus services: estimated bus frequencies:  
AM peak(thicker line busier route)
  - Bus stop
  - 400m walking distance from public transport station
  - Segregated cycle tracks
  - Existing London Cycle Network
  - CEGA boundary
- \*Quietway 3 terminates in Gladstone Park, and currently provides an important cycle link to central London. TfL has aspirations to extend this route further west through Neasden and towards Wembley and Harrow.

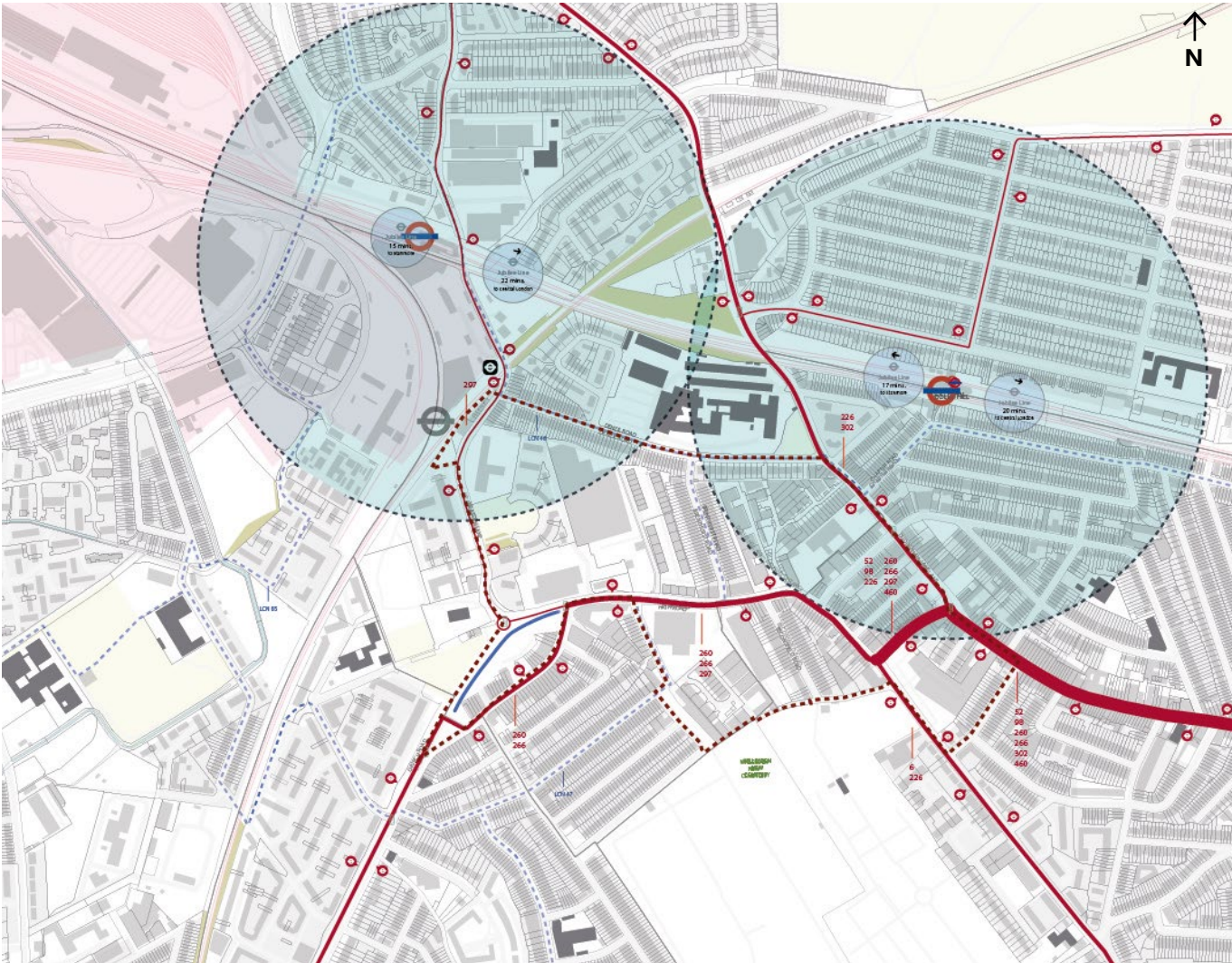


Figure 33 - Existing Movement and Transport Network. Adapted Hawkins\Brown Masterplan Report



## 5.3 Green and Open Spaces

### Proposed Framework

5.3.1 The proposed urban design framework will create a network of new and enhanced multi-functional open spaces, supporting health and well-being and opportunities for recreation and relaxation.

#### Key

- New Open /Green Spaces
  - 1.1 BSSA1: Residential Garden: 0.2 ha
  - 1.2 BSSA1: Creative Square: 0.2 ha
  - 1.3 BSSA2: Linear Open Space: 0.1 ha
  - 1.4 BSSA2: Rooftop Sport: 0.1 ha
  - 1.5 BSSA2: Rooftop Amenity: 0.05 ha
  - 1.6 BSSA3: Market Square: 0.2 ha
  - 1.7 Denzil Road Pocket Park: 0.05 ha
  - 1.8 Conley Road Pocket Park: 0.05 ha
- Improvement to existing spaces
  - 2.1 BSSA3: Town Centre: 0.3 ha
  - 2.2 BSSA3: Pocket Park: 0.01 ha
  - 2.3 St Mary's Church Yard: 0.3 ha
  - 2.4 St Mary's Forecourt: 0.1 ha
  - 2.5 Neasden Lane Open Space: -
  - 2.6 Franklyn Road Open Space: 0.05 ha
  - 2.7 Willesden New Cemetery: 0.3 ha
- Play and Recreation
  - 3.1 BSSA1: LAP: 1 x 400sqm
  - 3.2 BSSA2: LAP: 1 x 100sqm
  - 3.3 BSSA3: LAP: 1 x 100sqm
  - 3.4 St Mary's Church Yard: LAP: 1 x 100sqm
  - 3.4 Neasden Lane Open Space: LEAP: 1 x 300sqm
  - 3.4 Learie Constantine Open Space: LAP: 1 x 100sqm
  - 3.4 Franklyn Road Open Space: LAP: 1 x 100sqm
- Food Growing Related Denzil Road
  - 4.1 BSSA2: Rooftop Food Growing
  - 4.2 Trussell Food Growing
- Sports
  - 5.1 BSSA2: Rooftop Sports Court
  - 5.2 Chancel House New School
  - 5.3 Neasden Ln Open Space
- Church End Growth Area (CEGA) boundary
- - - Site Allocation boundary
- New green spaces
- Public realm improved/greening

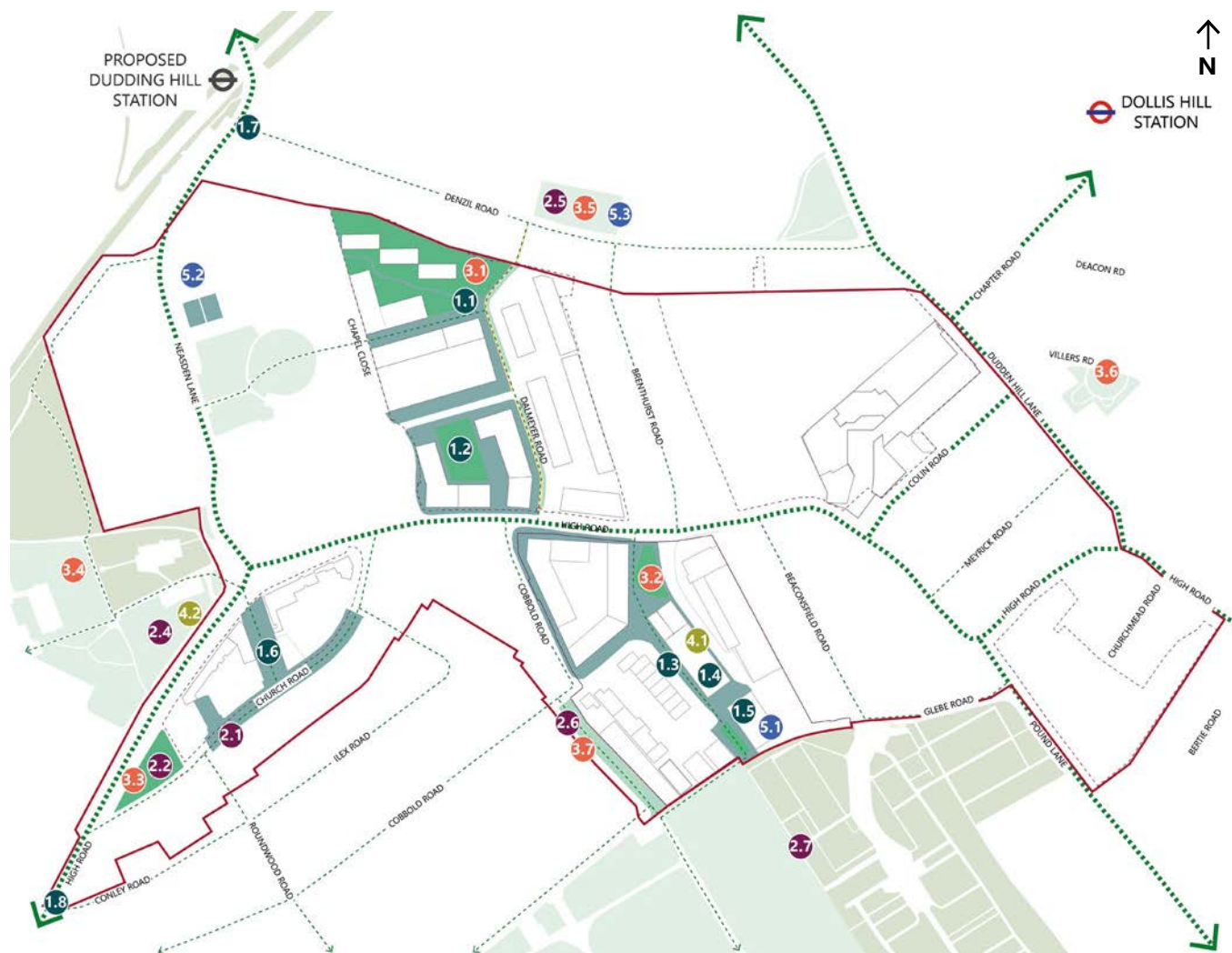


Figure 34 - Proposed green infrastructure framework. Adapted Hawkins\Brown Masterplan Report

## 5.3 Green and Open Spaces

### Development Principles

#### Open and Green Spaces

- **OGS1 Green spaces:** Contribute to the creation of a network of multi-functional green spaces, based on the site-specific requirements set out in Figure 34. (Local Plan policy BG11)
- **OGS2 Connectivity:** Connect new green spaces into the wider network of existing green spaces through street improvements. (London Plan policy G1)
- **OGS3 Safety:** Create safe spaces and secure access by designing out crime, and by providing well-lit and overlooked spaces, adjacent uses that provide activation. (Local Plan policy BG11)
- **OGS4 Maintenance:** Plan for long-term management and maintenance to ensure spaces are well-used and remain high quality over time. Developers should engage the community in the design of spaces to promote a sense of ownership, respect and responsibility. (Local Plan policy BG11)
- **OGS5 Sustainable design:** Deliver high quality design by integrating sustainability principles and ecological landscape features. This can include permeable paved surfaces,

native planting, durable/recycled materials for artificial elements, reduce watering maintenance, recycling provision, and renewable energy lighting. (Local Plan policy BG11)

#### Context

5.3.2 The Covid-19 pandemic highlighted the unequal access to quality open and green spaces and the impact this had in people's physical and mental health. CEGA suffers from a lack of open space, with the majority of CEGA located in an area of open space deficiency based on GLA's accessibility standards.

5.3.3 Figure 45 provides an overview of the local open space network within a 5, 15 and 25 minute walking distance. Within CEGA's inner boundary, the cemetery and church yard offer limited opportunities for recreation such as sports and play.

5.3.4 Within the wider open space network, the typologies vary between parks, churchyard,

allotments, and cemeteries. Most of the green spaces are located at the periphery or beyond CEGA. However, these open spaces are beyond the GLA accessibility standards, generally away from areas of higher footfall and not very visible.

5.3.5 In 2019 Keep Britain Tidy (KBT) assessed the conditions of facilities and the quality of existing provision against the Green Flag Standard. KBT identified key issues related to damage and vandalism, lack of facilities, absence of disability access, lack of natural surveillance and poor visibility in and out of the existing open spaces.



Figure 35 - Example LEAP - Gillet Square, Hackney/ Hawkins\ Brown Masterplan Report

## 5.3 Green and Open Spaces

### Development Principles

#### Play and Recreation

- **PLR1 Play areas:** Provide play areas and informal recreation spaces appropriate for different age groups, including children and teenagers, to be delivered in accordance with the site specific requirements set out in Figure 34. Provide 10sqm of dedicated play space per additional child. Prioritise on-site provision of play areas. Where provision of play is for older children who can travel further, it should be within 400m of the development and accessible via a safe route. If the developer proposes to make use of existing provision, then a financial contribution will be sought to enhance its quality and/or accessibility. (London Plan policy S4)
- **PLR2 Co-location of uses:** Co-locate formal play areas, informal play spaces and informal recreation spaces with places to dwell. Spaces should be designed to encourage social interaction between all age groups in the community. (London Plan policy S4)
- **PLR3 Inclusiveness:** Make spaces more playable by providing an environment that is stimulating, incidental, safe to access,

overlooked, incorporates greenery, and not segregated by tenure. (London Plan policy S4)

- **PR4 Routes:** Incorporate accessible routes for children and young people to existing play provision, schools and youth centres, enabling them to play and move around their local neighbourhood safely and independently. (London Plan policy S4)
- **PR5 Noise:** Consider adequate mitigation from noise where play areas are provided in shared amenity spaces or at podium level. (Local Plan policy DMP1)

#### Context

5.3.6 Across CEGA, there is limited provision of formal (equipped) play facilities and informal play spaces. There are however, two play spaces located at St Mary's Churchyard and Neasden Lane Open Space. KBT concluded that the local area as a whole has low provision of equipped play space.

5.3.7 There is a perception of poor personal safety in Church End and many families can feel

uncomfortable and unwilling to allow younger children to play in dedicated play spaces that sit isolated on quiet streets. Consultation activities highlighted a lack of spaces for children and teenagers.

*\* LAPs (Local Area for Play): A LAP is primarily for under-6s within 100m or 1 minute walking time. The recommended minimum activity zone for a LAP is 100sqm. A LAP can be within residential areas, and includes pocket parks,*

*\* LEAPs (Local Equipped Area for Play): A LEAP is for children who are beginning to play independently within 400m/ 5 minutes' walk. Its recommended minimum activity zone is 400 sqm. Mostly located within parks and residential areas.*



Figure 36 - Example LEAP - Cowley Teenage Space, Lambeth. Hawkins\Brown Masterplan Report



## 5.3 Green and Open Spaces

### Development Principles

#### Food Growing

- **FG1 Food growing:** Provide opportunities for food growing and community gardening on major sites, as per Figure 34. If not feasible, then appropriate off-site locations should be identified in consultation with the Council's allotment officer. (London Plan policy G8)
- **FG2 Ground investigation:** Consider the suitability of sites for food growing at ground level. This will need to be confirmed through ground investigation and remediation. (London Plan policy G8)
- **FG3 Site requirements:** Developers should lay out the initial landscape structure, allowing occupiers to then build on this with their own personalised planting schemes. Include a water supply as a minimum and, depending on the siting, secure perimeter fencing and footpaths. (London Plan policy G8)
- **FG4 Management:** Plan for long-term management and maintenance. Establish a management board to ensure food growing remains are well-managed in the long-term. (Local Plan policy DMP1, BGI1)

#### Context

5.3.8 Based on consultation with residents, there is great appetite for local food growing and gardening within CEGA. Although there are several allotments spaces nearby, most are at full capacity with long waiting lists.

5.3.9 Figure 45 shows allotments outside the CEGA boundary within a 20 minute walk; these include Yeats Close Allotment, Bridge Road Allotment, Gibbons Road Allotment, Longstone Allotment and Harlesden Town Gardens. Harlesden Town Gardens to the south of CEGA provides a good precedent of casual and accessible growing spaces successfully greening neighbourhoods and serving as social spaces.



Figure 37 - Wolves Lane Centre, Haringey. Wolves Lane Centre



Figure 38 - Uncommon Ground, Chicago. NPR Org

## 5.3 Green and Open Spaces

### Development Principles

#### Urban greening, Biodiversity and Habitat creation

- **UBH1 Urban Greening factor:** Aim to meet the Urban Greening Factor (UGF) of 0.4 for developments that are predominantly residential and 0.3 for those predominantly commercial (excluding B2 and B8 uses). (London Plan policy G5)
- **UBH2 Biodiversity gains:** Consider biodiversity in the wider site design and aim to secure net biodiversity gains. A balance should be struck to ensure quiet and undisturbed spaces where wildlife can thrive. (London Plan policy G6)
- **UBH3 Biodiversity links:** Create habitat corridors that connect to the existing network of wildlife corridors and habitats in the surrounding area. High quality landscape features should be integrated into street design separating conflicting modes of transport. (Local Plan policy BG11)
- **UBH4 Trees:** Retain existing trees and identify opportunities for introducing new street trees. Any loss of trees should be offset by appropriate mitigation measures. (Brent Local Plan Policy BG12)

#### Context

5.3.10 CEGA is built up and lacks green cover and areas for wildlife. Green spaces of importance to biodiversity within the surrounding area include: Roundwood Park and Willesden New Cemetery Grade II Site of Importance for Nature Conservation (SINC), St Mary's Churchyard Grade I SINC, Dudding Hill Loop between Cricklewood and Harlesden which is a Grade I SINC and wildlife corridor.



Figure 39 - Camden Beeline Org Gallery



Figure 40 - Stratford Butterfly Farm Gallery



## 5.3 Green and Open Spaces

### Development Principles

#### Outdoor Sports Facilities

- **OSF1 Health and well-being:** The fitness and wellbeing needs of the existing and new community should be met through the provision of multifunctional sports facilities to encourage an active lifestyle. Site-specific requirements in Figure 34 sets out the minimum to be delivered. (London Plan policy S5)
- **OSF2 Maintenance:** Development should contribute towards the maintenance, improvement and, where possible, expansion of existing sports facilities. (London Plan policy S5)
- **OSF3 Facilities:** All sports facilities, including pavilions, changing rooms, artificial pitches, and lighting, should be developed in accordance with Sport England's Design Guidance to ensure they are fit for purpose. (London Plan policy S5)
- **OSF4 Integration:** Developments should promote community cohesion and the multiple use of new premises will be secured through Community Use Agreements. (Local Plan policy BS11)

#### Context

5.3.11 There are no indoor sports facilities within CEGA. However, an outdoor sports pitch is located adjacent St. Mary's Churchyard and Fields. There is also additional provision within a 20/25 minute walk at Roundwood Park, Gladstone Park, Willesden Sports Centre and the College of North West London (CNWL). The redevelopment of Chancel House, CNWL and the NSGA are expected to retain/bring forward new sports facilities. There is a strong local community demand for more sports facilities, such as football pitches, basketball courts and a gym.



Figure 41 - Osterley Sports Centre. Lampton leisure



Figure 42 - Yinka Ilori design for the first public basketball court in Canary Wharf. Yinka Ilori Journal

## 5.3 Green and Open Spaces

### Development Principles

#### Public Realm

- **PR1 Streetscape:** Integrate elements that are functional and aesthetic in pedestrian spaces that provide amenity and utility to its users. (London Plan Policy D8 Public Realm)
- **PR4 Public art:** Ensure integration of public art in proposals and the involvement of the local community. (London Plan Policy D8 Public Realm)
- **PR5 Trees:** Retain existing trees and identify opportunities for introducing new street trees. Any loss of trees should be offset by appropriate mitigation measures. (Brent Local Plan Policy BGI2)

#### Context

5.3.12 The experience of moving around Church End can be quite confusing and disorientating, particularly for pedestrians. Due to poor quality public realm and a lack of east-west connections across the area, there it is not a clear or preferred route for pedestrians and cyclists, and vehicular movement is prioritised over more vulnerable road users.

5.3.13 The prominence of roads and service yards results in a large proportion of the surfaces within the CEGA consisting of tarmac or other similar materials robust enough to manage large vehicle traffic for industrial uses. The Growth Area has very wide roads with on-street parking, supported by additional car parks distributed across the area. By contrast, pedestrian footways remain narrow and cycling infrastructure is limited.



Figure 43 - Playful Street, Kings Crescent Estate, Muf Architecture



Figure 44 - Church End Street Mural , Conley Road/ Brent Image Library



## 5.3 Green and Open Spaces

### Existing Framework

#### Key

- Within a 10min walking distance
- 1 Willesden New Cemetery
  - 2 St Mary's Churchyard and Fields
  - 3 Neasden Lane Open Space
- Further than 20 min walking distance
- 4 Yeats Close Allotments (1.4 ha)
  - 5 Bridge Road Allotments (1.6 ha)
  - 6 Gibbons Recreation Ground (3.3 ha)
  - 7 Gibbons Road Allotments (0.5 ha)
  - 8 Brentfield Open Space (10.2 ha)
  - 9 Harlesden Canal
  - 10 Longstone Avenue Open Space (11.9 ha)
  - 11 Longstone Avenue Allotments (9.7 ha)
  - 12 Roundwood Park (14.8 ha)
  - 13 Harlesden Town Gardens (0.2 ha)
  - 14 King Edward VII Park (17 ha)
  - 15 Gladstone Park South (13 ha)
  - 16 Gladstone Park (27 ha)
- Canal network
- CEGA Boundary

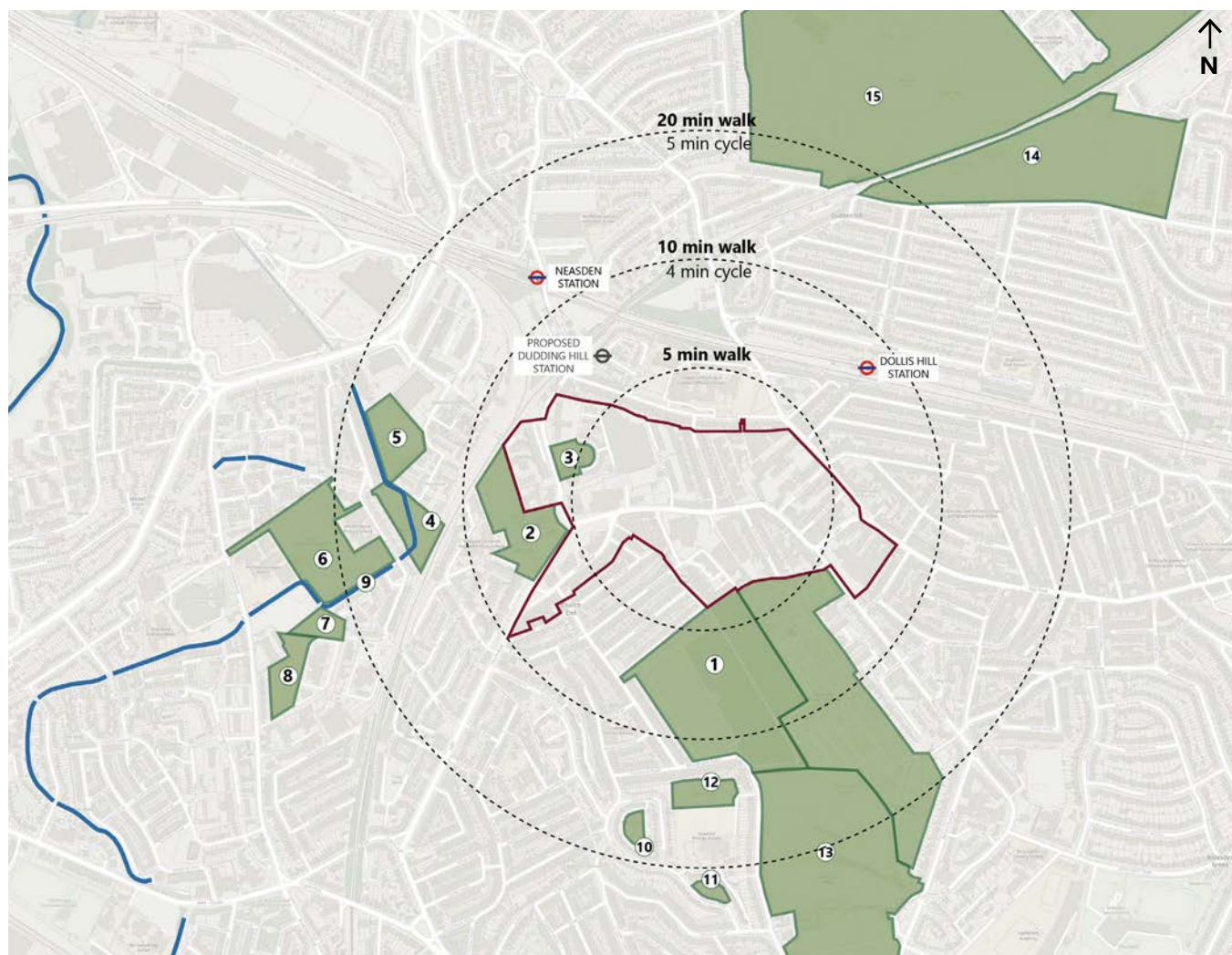
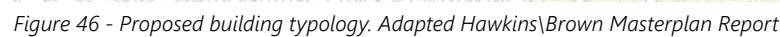


Figure 45 - Existing green infrastructure



5.4.1 The proposed urban design framework is informed by a detailed analysis of the local landmarks and heritage which contribute to Church End's distinctive identity. Based on a detailed analysis of CEGA it identifies typologies for new development which can broadly be categories into three groups:

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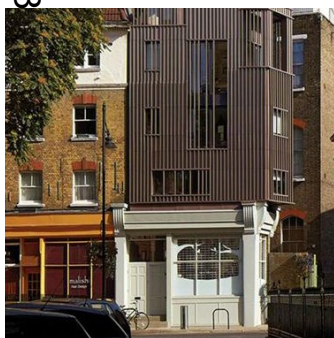
## 5.4 Building Design and Architecture

### Proposed Framework

#### High Street (site-by-site intensification)

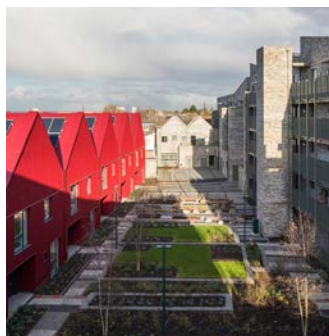


Radchurch Townhouse, Shoreditch, 31/44 Architects. Fill on high street responding to local character and grain



Alex Monroe Studio, Bermondsey, DSDHA. High street extension reflecting local scale and typology but introducing new cladding and aesthetic

#### New low-mid rise residential



Sutherland Road, Walthamstow, Levitt Bernstein. Creating contrasting aesthetic of typically residential and typically industrial materials and motifs



Bourne Estate, Clerkenwell, Matthew Lloyd Architects. Sensitive low-mid rise extension of residential estate using a range of materials and motifs to reflect existing character

#### New mid-high rise residential



Burridge Gardens, Hawkins\Brown. Mid-high rise blocks consisting of traditional materials used innovatively to incorporate art and feature detailing.



King's Crescent, Karakusevic Carson Architects. High-rise development reflecting London's new residential typology

#### New stacked industrial / residential



Caxton Works, Studio Egret West. New residential-led development stacked above industrial units using scale and materials to distinguish between uses



Bow Enterprise Park, ORMS Architectural Design. New residential-led development stacked above industrial units using scale and materials to distinguish between uses

#### New intensified industrial



Shoe Polish Factory, Architecture 00. Stacked industrial and workspace uses implementing a playful industrial typology and palette



Poplar Works, Poplar HARCA. Low rise stacked industrial uses reflecting industrial roofscape

#### New community hub



TNG Youth Centre, RCKa. New community hub and youth centre housed within restricted site

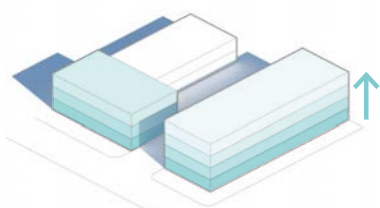


The Granville, RCKa. Retrofit of existing building to provide new community hub and affordable workspace

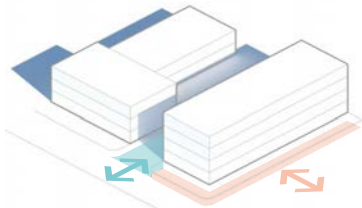
## 5.4 Building Design and Architecture

### Design Principles

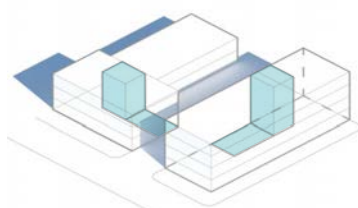
#### Industrial Intensification



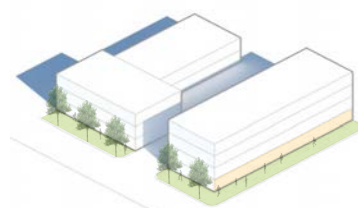
**Provide a wide range of accommodation types** helps better respond to the demands as well as optimising the way space is used. Encourage stacking smaller activities above larger ones.



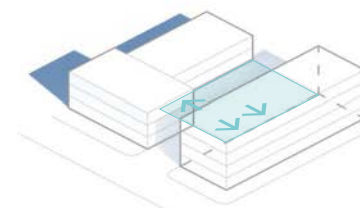
**Separate access for different uses and users** consolidates servicing areas allowing dedicated pedestrian and cycle access from the street. Providing multiple access points can radically improve accessibility of an industrial estate.



**Sharing of facilities** can create more efficient, intensive use of space. Facilities for loading, storage, goods lifts, gantry cranes, meeting space can be pooled and booked as required, allowing these facilities to be more intensively used throughout the day.

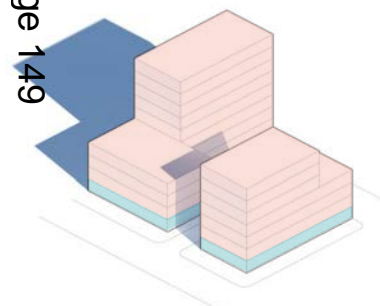


**Provide positive frontages and support place-making.** Improving the setting of existing heritage assets, creating positive street frontages and addressing open spaces can do this. It also ensures a positive relationship with adjacent neighbours.

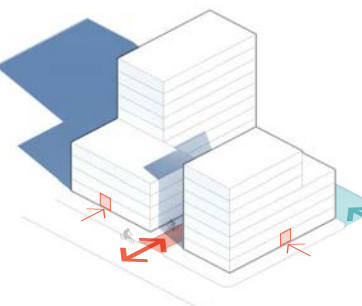


**Provide service yards, catered to the types of occupiers:** Incorporate sufficient space for HGVs to turn (where appropriate). Where occasional HGV access is required, consider shared parking.

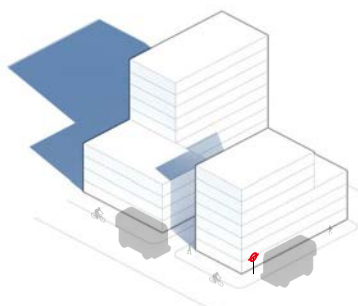
#### Industrial Co-location



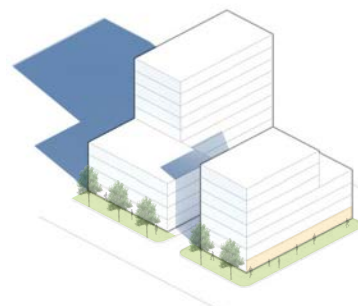
**Consider different types of mix and co-location.** This includes mixing at neighbourhood level, block level (horizontal mix) and building level (vertical mix). Understanding the specific requirements for each location should help make the most of each different approach.



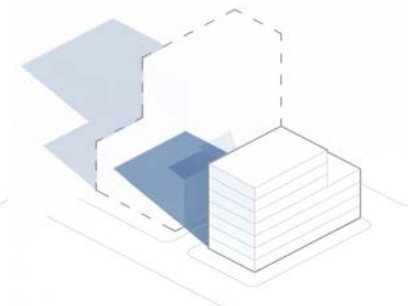
**Separate access for different uses and users,** consolidating servicing areas and providing dedicated access to allow separate pedestrian and cycle access from the street. Locate residential entrances and units along the street edge to provide positive street frontage.



**Promote public transport and active modes** of mobility by delivering legible cycle and pedestrian routes to public transport links such as railway stations and bus stops. Ensure a high level of pedestrian permeability across residential and industrial areas.



**Provide positive frontages and support place-making.** Provide strategies to improve the quality of the urban environment, such as improving the setting of existing heritage assets, creating positive street frontages and exploiting opens spaces.



**Phased developments to allow relocation.** This is to ensure owner occupiers can stay operational and investors retain income through construction. Strong relocation strategies and incentives can ensure local businesses remain in the area.



## 5.4 Building Design and Architecture

### Development Principles

#### Scale, Character and Typology

- **SCT1 Design-led:** Take a design-led approach to optimising site capacity, in accordance with the building typologies in Figure 46 and detailed guidance in the site allocations. (Local Plan policies BD1 and BD2)
- **SCT2 Intensification and co-location:** Sensitively co-locate and intensify industrial uses, ensuring continued efficient use, by applying the design principles in the previous page. (London Plan policy E7)
- **SCT3 Innovation:** Be of the highest architectural quality, providing innovative contemporary design that respects CEGAs past and current industrial character, but reflects modern day needs. (Local Plan policy BD1)

#### Context

5.4.5 A variety of different industrial uses have contributed to a range of different building typologies in CEGA. Although relatively piecemeal in evolution, collectively the variety of character and building stock is of merit. There is little consistency in the housing stock or palette across CEGA. Much of CEGA's housing stock currently consists of terraced houses and dwellings above retail and commercial units, often forming sensitive edges against industrial estates. Blocks of flats are generally concentrated along the main roads at Church Road, High Road and Dudden Hill Lane. Moving to the periphery of CEGA and beyond, there are smaller clusters of detached and semi-detached houses, however these represent a relatively small proportion of the housing stock.



Figure 47 - Church Road. Brent Image Library



Figure 48 - New Council development within the Church End Car Park. Wates

## 5.4 Building Design and Architecture

### Development Principles

#### Heritage

- **H1 Heritage:** Contribute to local distinctiveness by seeking to restore and retain architectural features of merit and by taking influence from the positive aspects of existing heritage assets. (Local Plan policy BHC1)
- **H2 Archaeology:** Where development is within an Archaeological Priority Area or Site of Archaeological Importance, a desk-based assessment will usually be required to be submitted to the council in consultation with the Greater London Archaeological Advisory Service (GLAAS). (Local Plan policy BHC1)

particular, the southern parade (176-216 Church Road) of Church End Local Centre retains many original Edwardian polychrome features. Adjacent to the CEGA are a number of designated heritage assets including St. Mary's Church (listed Grade II\*), Willesden Jewish Cemetery (listed Grade II) and Willesden New Cemetery (locally listed).

5.4.8 Within CEGA there is one Archaeological Priority Area (APAs), and two local Sites of Archaeological Importance (SAI). These are areas of significant known archaeological interest or potential for new discoveries. They help highlight where development might affect heritage assets.



Figure 50 - Willesden Jewish Cemetery is listed Grade II. FFLO



Figure 49 - St Mary's Church is listed Grade II\*. Brent Image Library



Figure 51 - Shortcroft Mead Courtin. Street View

#### Context

5.4.6 The CEGA boasts an extensive industrial and commercial history. Modern industries, such as electrical engineering, printing and graphics as well as the large-scale manufacture of consumer goods, have developed enormously on expansive sites, with varied architectural characteristics.

5.4.7 Whilst there are no conservation areas within CEGA, there are a number of individual buildings of local architectural merit considered to be of townscape importance. These are mapped on Figure 52. In



## 5.4 Building Design and Architecture

### Existing Framework

#### Heritage

#### Key

Listed

- 1 St Mary's Church: Listed Grade II\*
- 2 Willesden Jewish Cemetery: Listed Grade II\*

Locally listed

- 3 Shortcroft Mead Court
- 4 1 & 2 Church Cottages, Neasden Lane, NW10 9NL
- 5 Willesden Vestry Hall, Neasden Lane, NW10 2TS
- 6 Willesden New Cemetery
- 7 Willesden 7th Day Adventist Church, Glebe Road

Buildings of townscape importance

- 8 Neasden Studios
- 9 Willesden Bus Depot Entrance (and memorial)
- 10 Willesden Jewish Cemetery - House of Life Visitor Centre
- 11 Hostel NR 8, A407, London NW10 2JT
- 12 The Crown, High Road
- 13 Abundante Vida Church High Road NW10 2EN
- 14 London Apollo Club, 375 High Rd, London NW10 2JR
- 15 214-132 Church Road
- 16 Brent Mencap 379-381 High Road, NW10



Figure 52 - Existing heritage assets. Adapted Hawkins\Brown Masterplan Report



## 5.4 Building Design and Architecture

### Existing Framework

#### Housing Typology

5.4.9 There is little consistency in the housing stock or palette across CEGA. Much of CEGA's housing stock currently consists of terraced houses and dwellings above retail and commercial units, often forming sensitive edges against industrial estates. Blocks of flats are generally concentrated along the main roads at Church Road, High Road and Dudden Hill Lane. Moving to the periphery of CEGA and beyond, there are smaller clusters of detached and semi-detached houses, however these represent a relatively small proportion of the housing stock

Page 153

- Terraced housing (incl. those split into flats)
- Contemporary terraces
- Blocks of flats (< 3st)
- Blocks of flats (> 3st)
- Flats above high street units
- Semi-detached house
- Detached house
- ▨ Mainly terraced housing
- ▨ Mainly semi-detached housing
- ▨ Neasden Stations Growth Area (NSGA)
- ▨ Church End Growth Area (CEGA) boundary
- Site Allocation boundary

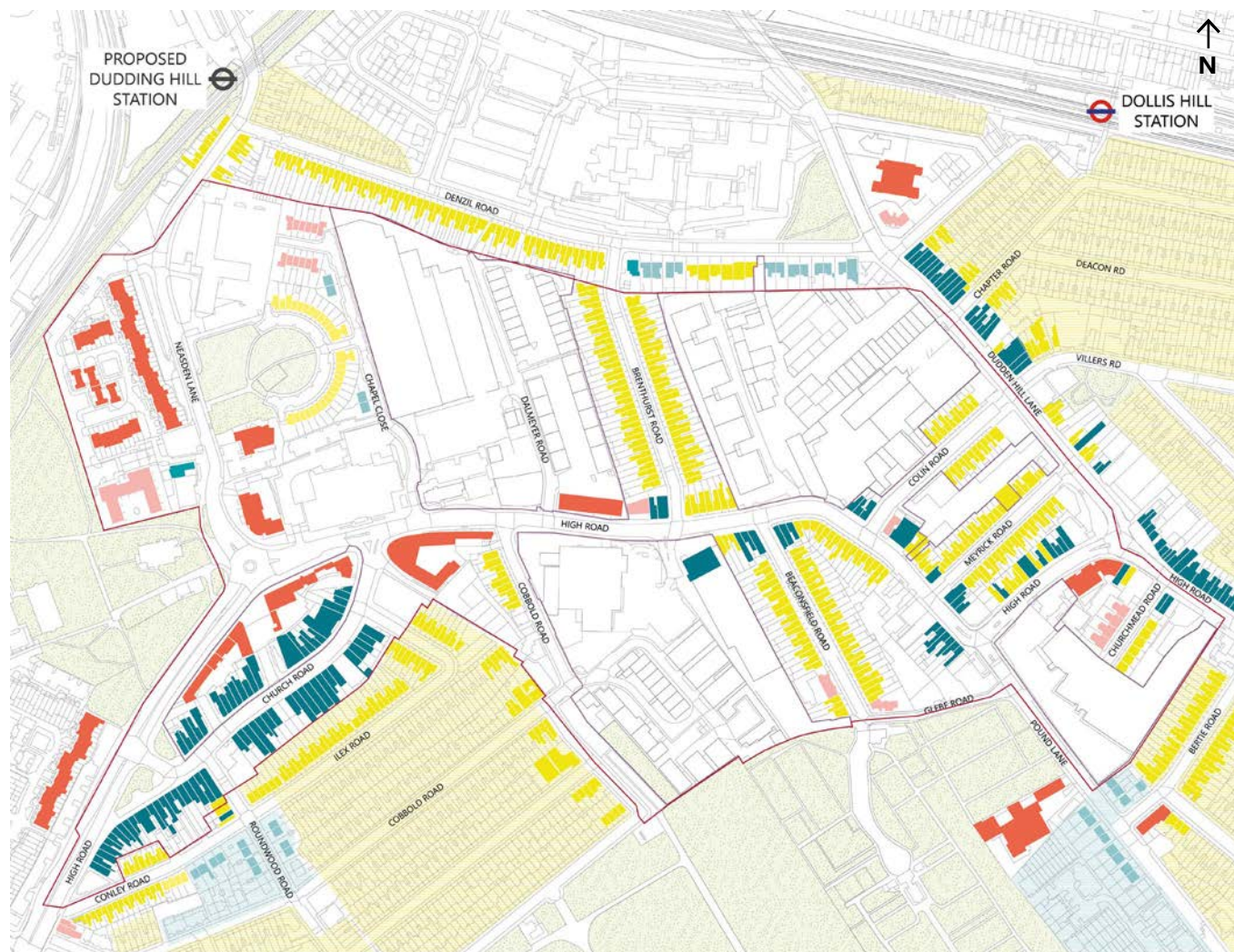


Figure 53 - Housing typologies. Adapted Hawkins\Brown Masterplan Report



## 5.4 Building Design and Architecture

### Existing Framework

#### Building Condition

5.4.10 Most of the industrial stock is functional. Many buildings are single storey (sometimes with mezzanines), some of which are in a fair-to-poor condition and in need of repair. At the same time, there are signs of gradual upgrade on a small number of units.

5.4.11 Town Centre buildings are well-functioning, but in a shabby condition and in need of maintenance. A small collection of buildings are either derelict or in a poor condition, but these will be demolished as part of the new development at the market square and car park.

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#### Key

- Relatively new
- Contemporary (not historic) and functional
- Contemporary (not historic) and in poor condition
- Old (historic) and functional
- Old (historic) and in poor condition
- Units in need of cosmetic improvements
- Church End Growth Area (CEGA) boundary
- Site Allocation boundary

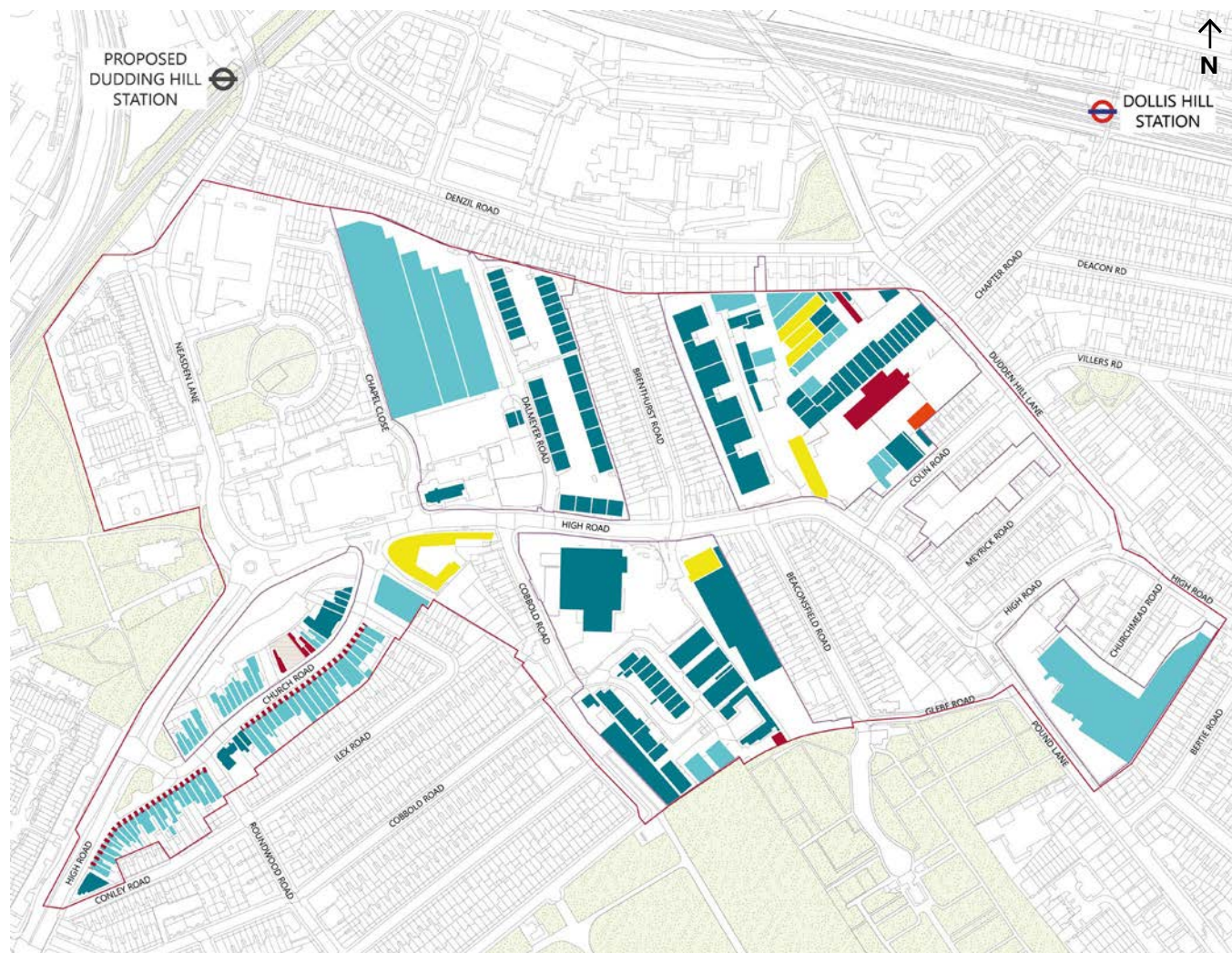


Figure 54 - Building condition. Adapted Hawkins\Brown Masterplan Report



## 5.4 Building Design and Architecture

### Existing Framework

#### Building Heights

5.4.12 The majority of buildings and structures are low in height, at around 6-7m tall. The low height of the industrial units, allows them to be placed right against the ownership edges, adjacent to private gardens without necessarily obstructing the daylight/sunlight for residents.

5.4.13 There are no tall buildings (over 30 metres as defined in the Local Plan) within CEGA.

5.4.14 The designated intensification corridor along Dudden Hill Lane signifies an area where taller buildings (up to 15 metres) could be accommodated. However, most of this zone lies outside the five main site allocations.

5.4.15 New proposed developments at the end of Church Road demonstrate a gradual increase in height, though none of the proposals exceed 6 storeys (approx 18m).

#### Key

- < 5m
- < 8m
- < 11m
- < 14m
- < 17m
- > 17m (+)
- Church End Growth Area (CEGA) boundary
- Site Allocation boundary

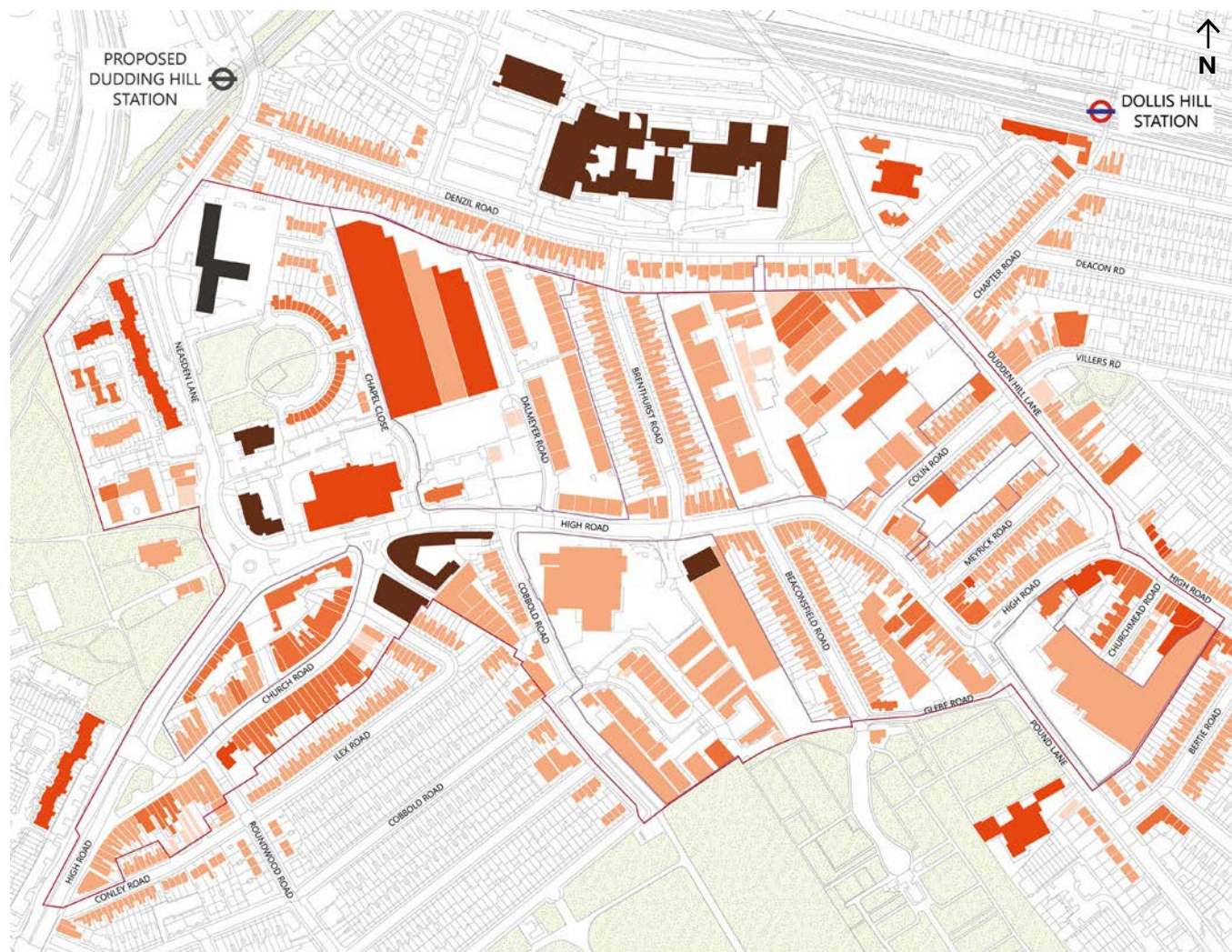


Figure 55 - Building heights. Adapted Hawkins\Brown Masterplan Report

## 5.4 Building Design and Architecture

### Existing Framework

#### Planning Applications

**5.4.19 Church End Market Square:** A new mixed use building and market square at the heart of the wider regeneration of Church End. The project comprises 34 new homes, an enterprise space, and community facilities. A new market square will give a central focus for Church End and provide additional employment. (planning permission granted) 13/2213 and 13/1098



Figure 56 - Planning Application 13/1098

**5.4.20 The Workshops – Willesden:** Comprehensive redevelopment to introduce five mixed use blocks ranging from 4 to 10 storeys plus basement levels, comprising; 245 residential units, light industrial floorspace, a supermarket, gym, nursery, and commercial units and offices. Although the application has been withdrawn, the proposal illustrate potential redevelopment of the site. (planning application withdrawn, but designs taken into consideration when developing the masterplan)



Figure 57 - Withdrawn Planning Application

**5.4.21 Chancel House** is being replaced with a five-storey secondary school and separate sixth form building incorporating a MUGA on the roof. North Brent School will take 900 pupils in Years 7 to 11, and 250 A-Level pupils. Works have started on site and opening date is expected by September 2023.



Figure 58 - Chancel House School Planning Application 19/2804



## 5.5 Climate Change and Sustainability

### Development Principles

#### Objective

5.5.1 Brent has declared a climate and ecological emergency. It has set the goal of achieving carbon neutrality in the borough by 2030. The Brent Climate & Ecological Emergency Strategy (2021-2030) requires a collaborative approach to create a greener, cleaner and more sustainable borough. The proposed development principles set out how CEGA will be a net zero carbon place that achieves the highest standards in sustainable design and construction, which also mitigates the risk of flooding and overheating.

#### Resilient, Efficient and Healthy development

- **REH1 Zero carbon:** Achieve net zero carbon through the application of the energy hierarchy 'Be Lean, Be Clean, Be Green, Be Seen,' evidenced in an Energy Statement. Developments should seek to connect to nearby district heating networks and maximise opportunities for renewable energy. (London Plan policy SI2 and SI3)
- **REH2 Design:** Be designed to mitigate and adapt to climate change over the developments lifetime. For major development this should be

set out in a Sustainability Statement, and for minor development in the Design and Access Statement. (Local Plan policy BSUI1)

- **REH3 Quality:** BREEAM Excellent rating is required for non-residential development. A Design Stage BRE Interim certificate of compliance and a Post Construction Certificate will be required. (Local Plan policy BSUI1)
- **REH4 Healthy communities:** Development is encouraged to incorporate the Building for a Healthy Life principles to create healthy communities. (NPPF)

#### Context

5.5.2 In Brent, 35% of CO<sub>2</sub> emissions come from commercial or industrial buildings, 22% from road transport and 43% from homes. Data from the UK National Atmospheric Emissions Inventory indicate that particles from brake wear, tyre wear and road surface wear currently constitute 60% and 73% (by mass), respectively, of primary PM<sub>2.5</sub> and PM<sub>10</sub> emissions from road transport, and will become more dominant in the future.

5.5.3 Therefore, sustainable design and construction is of significant importance. Everyone who lives, works and studies within Brent will need to contribute to this transformation. This will be through a mixture of focussed measures including carbon reduction, energy efficiency, waste reduction, air quality, sustainable urban drainage, biodiversity and tree planting.



Figure 59 - Brent Climate Emergency Strategy Cover

## 5.5 Climate Change and Sustainability

### Development Principles

#### Air Quality and Pollution

- **AQP1 Air quality positive:** All major development should be air quality positive. Design should be informed by a preliminary Air Quality Assessment and Air Quality Positive Statement to ensure air quality is considered from the outset. (Local Plan policy BSUI2)
- **AQP2 Mitigation:** Adopt mitigation measures and design solutions, as set out in paragraph 5.6.6, to prevent or minimise exposure to existing air pollution and make provision to address local air quality problems. (London Plan policy SI1)
- **AQP3 Construction impact:** Reduce the impact on air quality during the construction and demolition phases. (London Plan policy SI1)

#### Context

5.5.4 The majority of the borough is within an Air Quality Management Area (AQMA). Brent meets all national air quality targets except on two pollutants; nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>). Church End falls within one of the four Air Quality Focus Areas (AQFA) designated by the Council.

5.5.5 The largest contributors to poor air quality are road transport, local energy generation and construction. CEGA is particularly affected by these factors due to the existing road network (A407 High Road, B453 Neasden Lane) and industrial sites activities.

5.5.6 Mitigation measures should be considered at the earliest stage of the design process, including, but not limited to the following:

- Developments should not be designed with windows solely facing onto busy roads, such as Neasden Lane and A407 High Road;
- The shape, orientation, height and location of building footprint on site to enable airflow to disperse pollution from local sources;
- Designing the layout of the site with generous street widths so that pollution does not get trapped in narrow spaces between tall buildings;
- Outdoor spaces located within low pollutant concentrations areas or where the development creates healthy conditions;
- Reduce exposure in public realm by adopting healthy streets approach;

- Green infrastructure in the right place to reduce exposure to air pollution;
- Triple glazed windows;
- Maximise natural ventilation and avoiding single aspect units.



Figure 60 - View to Wembley Park. Brent Library Image

## 5.5 Climate Change and Sustainability

### Development Principles

#### Agent of Change and Contamination

- **ACC1 Agent of change:** Apply the agent of change principle to ensure no unreasonable restrictions are placed on non-residential uses. (London Plan policies E7 and D13)
- **ACC2 Odour:** Incorporate odour, dust and emissions reducing design features. (Local Plan policy DMP1)
- **ACC3 Noise:** Demonstrate how noise impacts will be mitigated through a formal acoustic study or Noise Assessment. (London Plan policy D14)
- **AC4 Contamination:** Ensure development does not increase exposure to contamination. A preliminary contamination risk assessment will be required and any necessary remediation measures followed before construction commences. (Local Plan policy DMP1)
- **AC5 Servicing:** Ensure continued servicing and delivery access for existing industrial uses during and post construction. (Local Plan policy E7)

#### Context

5.5.7 CEGA caters to a wide variety of uses including industrial, residential and town centre. In some sites the development approach will be to intensify industrial uses and co-locate with residential uses. This could also include industrial related activities where there will be higher levels of noise, dust and emissions. Industrial uses may also require servicing yards and 24hour/7day access. Industrial uses should be able to continue to operate and expand without unreasonable restrictions being placed on them.

5.5.8 Based on the current and historic industrial uses, there is likely to be a risk of land contamination.



Figure 61 -Bird Eye View: Church End. Vizible 3d



## 5.5 Climate Change and Sustainability

### Development Principles

#### Waste

- **W1 Waste reduction:** Reduce waste and apply circular economy principles. (London Plan policy SI7)
- **W2 Circular economy:** Development should seek to reduce life-cycle carbon emissions. In the first instance, considering if the retention and retrofit of existing buildings is appropriate to achieve both sustainability and wider policy objectives. Proposals referable to the Mayor should be accompanied by a Whole Life Cycle Carbon Assessment. (London Plan policy SI7)
- **W3 Storage:** Carefully consider refuse storage and collection systems that support recycling, in the context of a mixed-use industrial and residential development. Development should be supported by a Site Waste Management Plan and Operation Waste Management Plan. (London Plan policy D6 and SI7).

#### Context

5.5.9 The co-location of industrial and residential present an opportunity to move towards a low carbon circular economy contributing towards London's zero-carbon target. A circular economy is one where materials are retained in use at their highest value for as long as possible. Materials are then re-used or recycled, leaving a minimum of residual waste. Co-location presents additional challenges as proposals will need to accommodate both household and commercial waste.

5.5.10 In areas not identified for co-location there is potential to retain and refurbish some of the existing industrial premises. The best use of the land needs to be taken into consideration when deciding whether to retain existing buildings in a development, working through refurbishment and re-use.



Figure 62 - Waste Collection. Brent Library Image

## 5.5 Climate Change and Sustainability

### Development Principles

#### Flooding and Water management

- **FW1 Flood Risk Assessment:** Be resistant and resilient to all forms of flooding, taking into account climate change allowance, and not increase the risk of flooding elsewhere. Sites within Flood Zone 2 or 3, or designated Critical Drainage Areas should be supported by a Flood Risk Assessment. (Local Plan policy BSUI3)
- **FW2 Sustainable Drainage:** Reduce impact on the current drainage regime through a Sustainable Drainage Strategy, to manage the flow and rate of surface water entering drains and sewers through infiltration methods. (London Plan policy SI13, Local Plan policy BSUI4)
- **FW3 Consumption:** Achieve the target for mains water consumption of 105 litres or less per person per day and be supported by a Water Efficiency Assessment. Developments should incorporate water management methods such as smart metering, water-saving and greywater recycling. (Local Plan policy BSUI4)
- **FW4 Supply:** Demonstrate sufficient water

supply and wastewater disposal capacity to minimise the impact on existing infrastructure, and ensure the separation of surface and foul water systems. The Water Utility provider (Thames Water) should be engaged at the earliest stage. (London Plan policy SI5)

#### Context

5.5.11 Small parts of land within CEGA are in Flood Zone 3a due to risk of surface water flooding. Areas affected include small parts of built up land and some highways like Chapel Close, Brenthurst Road, Beasconfield Road and Church Road. In addition, all of CEGA falls within a Critical Drainage Area as defined in the Brent Surface Water Management Plan. Development offers an opportunity to address some of the noted sensitivities, including surface water flooding. Parts of CEGA at risk of flooding may exacerbate the degree of risk downstream or within the surrounding community if new development increases the rate of surface water run-off.




Figure 63 - Flooding and Water Management illustration. Brent Library Image



# 6.0 Site Allocations

- 6.1 BSSA1: Asiatic Carpets
- 6.2 BSSA2: B&M Home Store and Cobbold Industrial Estate
- 6.3 BSSA3: Church End Local Town Centre
- 6.4 BSSA4: Chapman's and Sapcote Estate
- 6.5 BSSA5: Willesden Bus Depot
- 6.6 BSSA8: McGovern's Yard

An aerial photograph of a city, likely London, showing a mix of modern and traditional architecture. In the foreground and middle ground, several modern, multi-story buildings with light-colored facades and green roofs are prominent. These buildings are interspersed with older, more traditional residential buildings with dark roofs. The background shows a dense urban landscape with more buildings and greenery. The overall scene is captured from a high angle, providing a comprehensive view of the urban environment.

# 6.1 BSSA1: Asiatic Carpets



6.1 BSSA1: Asiatic Carpets

About The Site

Site Summary

Item	Description
About the site	BSSA1 can be divided into Asiatic Carpets site to the west of Dalmeyer Road, and Cygnus Business Park to the east. It includes the Probation Service offices, Asiatic Carpets and Neasden Studios. Neasden Studios: a film studio of over 60,000sqft (over 5,500sqm), serving the film and TV industry with four 30ft (9m) high stages, production offices and a car parking. Asiatic Carpets: a rug wholesaler occupying a large warehouse. Cygnus Business Centre comprises smaller one and two storey industrial units. Key occupiers include Junk Hunters, Double Glazing, Auto Hire, and Saloria Architects.
Site area	3.5ha
Built floorspace	17,307sqm
Businesses	39
Jobs	410 (Asiatic Carpets), 194-258 (Cygnus) (HCA official estimate)
Existing homes	0



Figure 55 - Access from Cygnus Industrial Estate.



Figure 56 - View from Chapel Close.

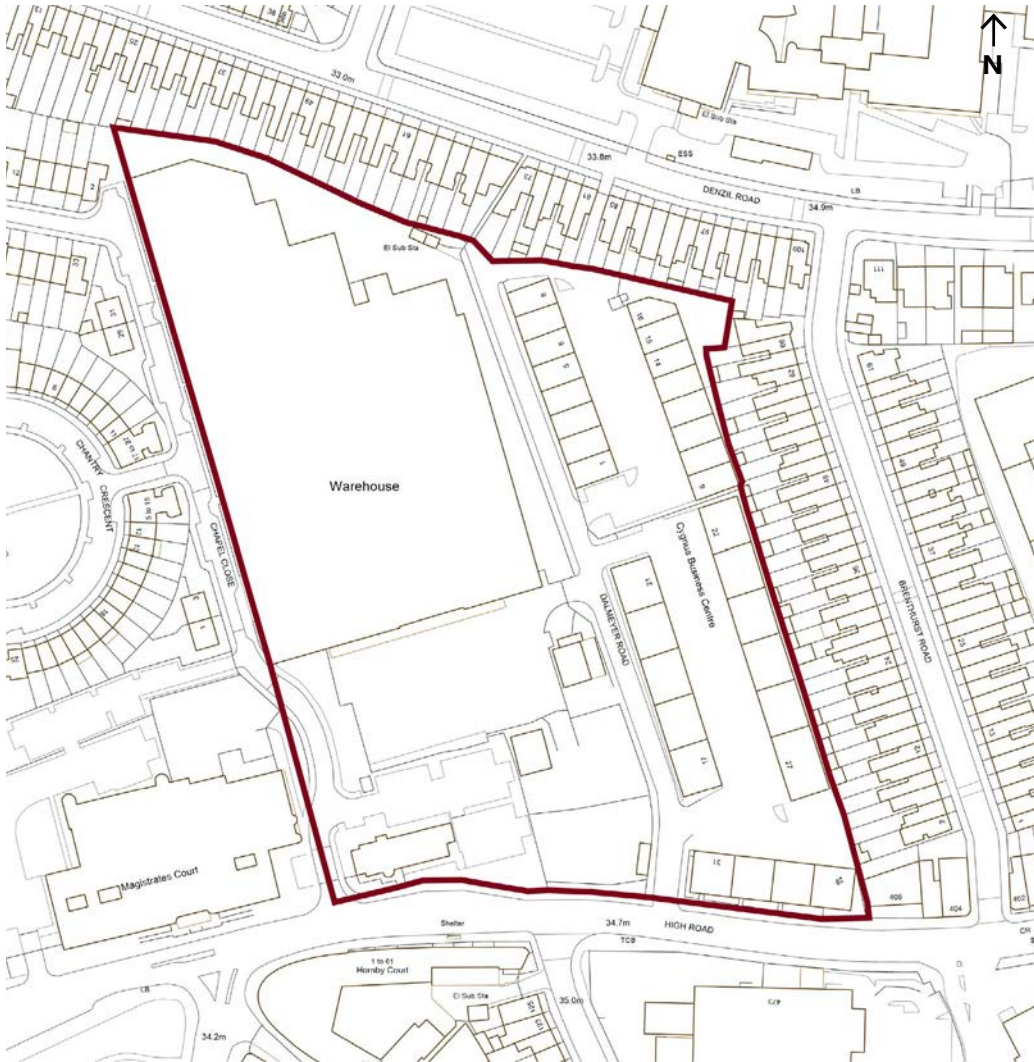


Figure 57 - Site Allocation BSSA1

## 6.1 BSSA1: Asiatic Carpets

### Policy Requirements

#### Strategic Objective

Deliver a mixed use neighbourhood focussed around a film and media production hub (building upon the existing Neasden Studios), supported by affordable workspace, complementary light industrial, community spaces, open space and play space.



#### Indicative Homes

Indicative target of 414 homes, to provide a mixed community including affordable housing (target 50% affordable, with a 70:30 social/ intermediate split) 25% family (3bed+) housing and specialist older person's accommodation.



#### Industrial Spaces and Affordable Workspaces

LSIS Site: On the Asiatic Carpets site maximise industrial floorspace and affordable workspace. The retention of the film and production function around Neasden Studios is strongly encouraged. On the Cygnus Business Centre site retain existing businesses where possible, ensuring industrial floorspace is intensified and access to a consolidated shared service yard is retained. 10% of new industrial floorspace is to be affordable.



#### Planning Considerations

Air Quality Management Area, Partly within Flood Zone 3a due to Surface Water Flooding, Partly within an Area of Archaeological Interest, Contamination Risk.



#### Green, Open and Play Spaces

- 2 x 0.2 ha pocket parks +
  - 1x approx. 300sqm Local Area of Play (LAP) +
  - 1x approx. 100sqm LAP
- As per figure 34



#### Community Spaces

- 2x Community Spaces:
- Asiatic Carpets 1x approx. 900sqm. Community space linked to the existing arts and film production supporting training and employment for young people.
  - Probation Centre 1x approx. 450sqm. A community facing function for the Probation Service.



#### Building Heights

Buildings heights to vary between 2-10 storeys. Buildings need to respect the 30 degree angle from ground level windows at Chapel Close and 45 degrees from rear gardens. Cygnus Estate is only 13-15m apart from adjacent residential terraces. Within the proposed massing, the buffer between the service yard and the homes allow this proximity.

## 6.1 BSSA1: Asiatic Carpets

### Proposed Framework

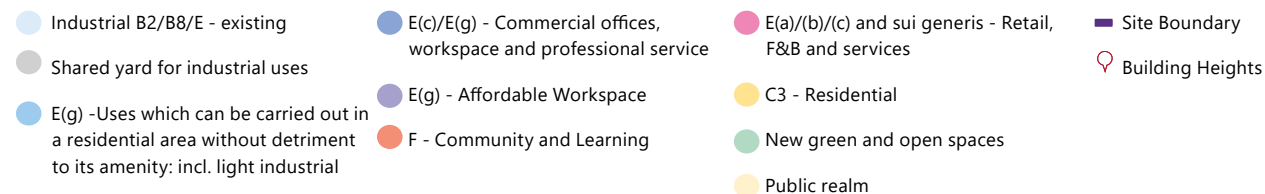
#### Design Principles

- Establish new continuous east-west and north-south connections and improve pedestrian and cycling permeability, opening up the site to nearby streets i.e. Chapel Close;
  - Retain existing businesses within the Cygnus Business Centre while intensifying floorspace and consolidate shared service yards and access points;
  - Ensure that new public spaces and pedestrian routes are well-overlooked, and activated by residential and commercial entrances and frontages;
- Establish a buffer between shared service yards and small open spaces, ensuring these spaces are safe and welcoming;
- Co-locate complementary uses, exploring opportunities for linking community spaces and services to workspace anchors, around public spaces;
  - Explore the potential for increased building heights within the core of the site and towards the High Road, dropping down towards the existing residential streets and sensitive boundary conditions.

#### Proposed Massing



Figure 58 - Proposed Massing BSSA1 indicating 6-10 storeys in the middle of the site and 2-4 storeys adjacent to existing properties. Hawkins\ Brown Masterplan Report





An aerial photograph of a city, likely Glasgow, showing a mix of modern and traditional architecture. Several large, modern buildings with green roofs are prominent, interspersed with older, smaller buildings. A large, modern building with a green roof and a basketball court on its roof is visible in the lower center. The text '6.2 BSSA2: B&M Home Store and Cobbold Industrial Estate' is overlaid in white, bold font on the left side of the image.

## 6.2 BSSA2: B&M Home Store and Cobbold Industrial Estate



6.2 BSSA2: B&M Home Store and Cobbold Industrial Estate

About The Site

Site Summary

Item	Description
About the site	<p>The site contains a B&amp;M Home Store with Garden Centre and customer car parking. To the east Moran House fronts the warehouse for MP Moran and Sons. Moran House which faces the High Road consists of offices (including housing local organisations and charities), as well as some residential units.</p> <p>To the rear, Cobbold Industrial Estate and Trojan Business Centre comprises predominantly one storey industrial units suitable for small businesses, with a number of larger three storey industrial units to the rear. Key occupiers of this site include Amipak and Such Design.</p>
Site area	3ha
Built floorspace	20,056sqm
Businesses	29
Jobs	394-524 (HCA official estimate)
Existing homes	0



Figure 59 - Frontage from the High Road. Hawkins\ Brown Co-Location study



Figure 60 - Frontage from the High Road. Hawkins\ Brown Co-Location study



Figure 61 - BSSA2 Site Allocation Boundary Map

## 6.2 BSSA2: B&M Home Store and Cobbold Industrial Estate

### Policy Requirements

#### Strategic Objective

Increased industrial floorspace is to be supported by a mixed-use (residential-led) development along the High Road, a new public space and a flexible and affordable community space.



#### Indicative Homes

Indicative target of 160 homes, to provide a mixed community including affordable housing (target 50% affordable, with a 70:30 social/ intermediate split), 25% family (3bed+) housing and specialist older person's accommodation.



#### Industrial Spaces and Affordable Workspaces

Retain existing businesses within both the Trojan and Cobbold Industrial Estates where possible, ensuring industrial floorspace is re-provided and intensified. Access to consolidated shared service yard is to be retained where partial redevelopment is required. 10% of new industrial floorspace to be affordable. The provision of affordable kitchen space as a hub for local catering and food businesses is encouraged.



#### Planning Considerations

Air Quality Management Area, Partly within Flood Zone 3a due to Surface Water Flooding, Partly within an Area of Archaeological Interest, Contamination Risk.



#### Green, Open and Play Spaces

- 1x 0.1ha open/green space +
- 1x 100 sqm LAP +
- 1x 0.05ha rooftop food growing +
- 1x 0.05ha rooftop sports pitch

As per figure 34



#### Community Spaces

A health hub will be subject to on-going discussion with the Clinical Commissioning Group (CCG). Should premises not be required by the CCG, an alternative community space should be provided on site and a health focus will be encouraged. (approx. 2,755sqm)



#### Building Heights

Buildings heights to vary between 3-8 storeys. Development will need to address the close proximity to the residential homes at Cobbold Road, by setting alignment back from current site-edge, and minimising impact of massing.

## 6.2 BSSA2: B&M Home Store and Cobbold Industrial Estate

### Proposed Framework

#### Design Principles

- Establish new east-west and north-south connections across the site that improve permeability for both pedestrians and cyclists, removing dead ends and opening up the site to nearby streets and the wider area; specifically Willesden New Cemetery and Church Road.
- Increase building heights within the core of the site and towards the High Road, dropping down towards the existing residential streets and sensitive boundary conditions.

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Create dynamic and architecturally rich blank frontages along Cobbold Road, and wherever else these are unavoidable, drawing on characterful exemplars.

- Emphasise the importance of the shared service yard as a key part of any route through the site to Willesden New Cemetery.
- Co-locate complementary uses, exploring opportunities for linking community spaces and services to workspace anchors, around public spaces.
- Support the clustering of public-facing uses towards the High Road and along pedestrian routes.

#### Proposed Massing

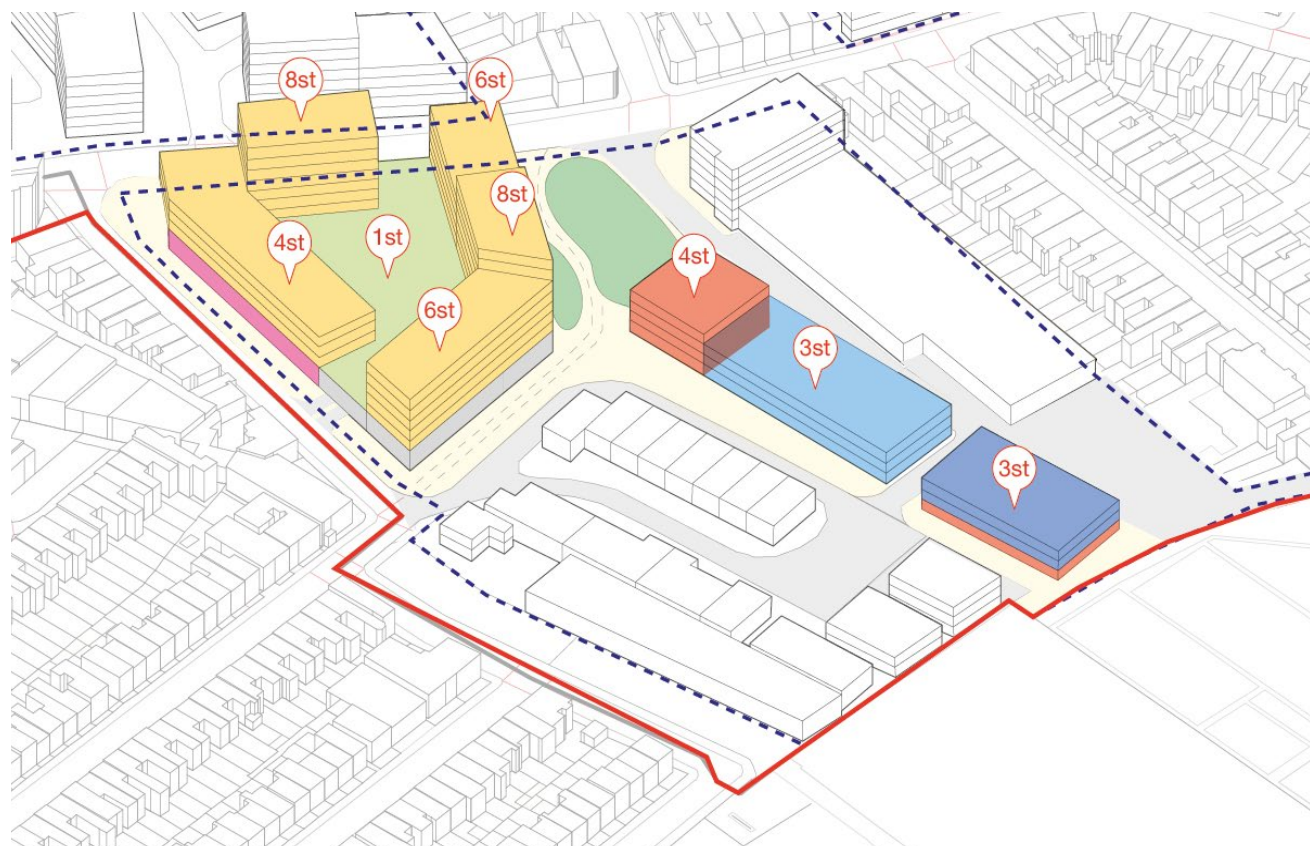
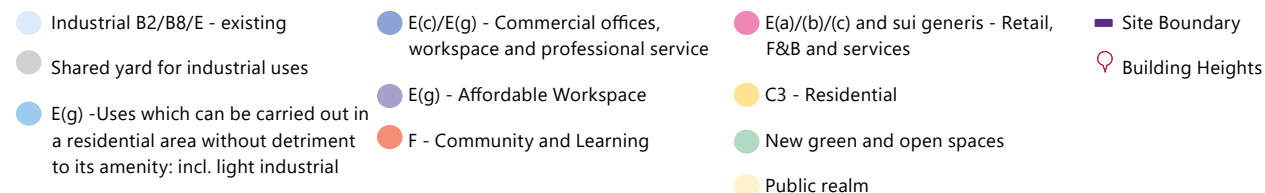


Figure 62 - Proposed Massing BSSA2 indicating 6-10 storeys in the middle of the site and 3-4 storeys adjacent to existing properties. Hawkins\ Brown Masterplan Report





An aerial photograph of a city, likely Glasgow, with a green tint overlay. The image shows a mix of residential and commercial buildings, with a large stadium (Glasgow Celtic Park) visible in the background. The text '6.3 BSSA3: Church End Local Town Centre' is overlaid in white.

# 6.3 BSSA3: Church End Local Town Centre



6.3 BSSA3: Church End Local Town Centre

About The Site

Site Summary

Item	Description
About the site	Church End Local centre contains a number of organisations and spaces which serve the community including Catalyst Housing Association, Afghan Islamic Cultural Centre, Markaz Darul Hadith Learning Centre and Beulah Apostolic Church. Alongside Church End Market and the shops, cafes and takeaways other notable uses in the Town Centre include the TBN UK recording studio. St. Mary's Willesden Church and Willesden Magistrates' Court are to the north of the site. The church hosts a number of organisations within its facilities including Brent Foodbank run by the Trussell Trust and Happy Hands Montessori Nursery.
Site area	0.97ha
Built floorspace	4,288m2
Businesses	70
Jobs	215-304 (HCA official estimate)
Existing homes	32



Figure 63 - Church Road Shops. Brent Library Image



Figure 64 - Church Road. Brent Library Image

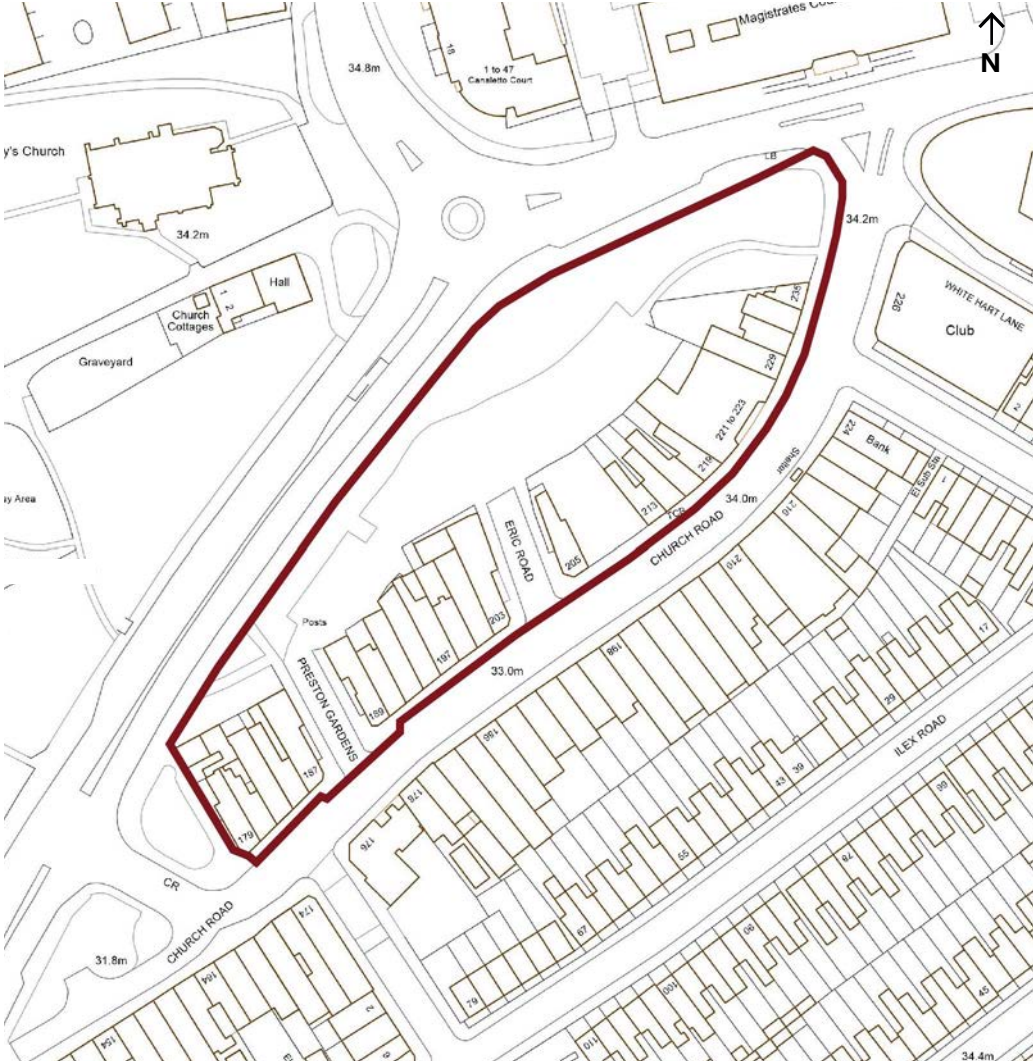


Figure 65 - BSSA3 Site Allocation Boundary Map

## 6.3 BSSA3: Church End Local Town Centre

### Policy Requirements

#### Strategic Objective

Increased industrial floorspace is to be supported by a mixed-use (residential-led) development along the High Road, a new public space and a flexible and affordable community space.



#### Indicative Homes

Indicative target of 193 homes, to provide a mixed community including affordable housing (target 50% affordable, with a 70:30 social/ intermediate split), 25% family (3bed+) housing and specialist older person's accommodation. 99 homes are already consented under planning applications 13/1098 and 13/2213. It is envisaged the remainder of homes will largely come forward through intensification of upper floors for housing in line with the Church Road Design Guide, Appendix A.



#### Commercial Spaces

Diversify town centre uses including retail, leisure, community and workspace and employment uses.



#### Planning Considerations

Air Quality Management Area, Partly within Flood Zone 3a due to Surface Water Flooding, Partly within an Area of Archaeological Interest and Site of Archaeological Importance.



#### Green, Open and Play Spaces

- 1x Church End Market Square 0.2ha +
- 1x 0.2ha Pocket Park +
- 1x 100 sqm LAP

As per figure 34



#### Community Spaces

Re-purposing of vacant and underused high street units to provide new community space and affordable workspace is encouraged, with an emphasis on space for young people, art and local enterprise. This will create increased opportunities for secular community and cultural activity, especially adjacent to larger areas of public realm.



#### Building Heights

Buildings heights to vary between 3-5 storeys. Development will need to respect the current street alignment, providing no more than 5-storeys.

## 6.3 BSSA3: Church End Local Town Centre

### Proposed Framework

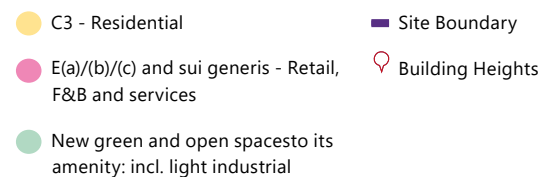
#### Design Principles

- Support the creation of a community high street, with improved public realm and tree planting to create a more tranquil, pedestrian friendly environment.
- Creative active frontages and direct access on to a new public space at the southwest of the site that could support outdoor events, reconfiguring the existing parking and redundant vehicle turning lanes.
- Enhance the appearance and function of the existing frontages along Church Road through conservation, repair and refurbishment.
- Define a new public space at the southwest of the site that could support outdoor events, reconfiguring the existing parking and redundant vehicle turning lanes.

#### Proposed Massing



Figure 66 - Proposed Massing BSSA3 indicating 4-5 storeys in the northern side of the site and 1-3 storeys in the southern side. Hawkins\Brown Masterplan Report





An aerial photograph of a cityscape. In the foreground and middle ground, there are several modern, multi-story apartment buildings with light-colored facades and many windows. Some of these buildings have green roofs. To the left and in the background, there are older, more traditional residential buildings with dark roofs and smaller windows. The city is densely packed with buildings, and there are some trees scattered throughout. The overall tone of the image is somewhat muted, with a greenish-blue tint.

# 6.4 BSSA4: Chapman's and Sapcote Estate



6.4 BSSA4: Chapman’s and Sapcote Estate

About The Site

Site Summary

Item	Description
About the site	The site can be broadly broken down into three areas. Sapcote Trading Centre to the north and east which comprises one storey units largely occupied by vehicle repair premises. Industrial storage and units around the derelict dairy depot, with garages fronting Colin Road. Chapman’s Park Industrial Estate to the west comprising larger industrial units. Key occupiers include Topps Tiles, Howdens, Euroken and Wembley Tyres.
Site area	3.12 ha
Built floorspace	1,546sqm
Businesses	63
Jobs	119-159 Chapman’s Park; 420-560 (Sapcote) (HCA official estimate)
Existing homes	0



Figure 67 - Access from the High Road. Hawkins\Brown Co-Location study



Figure 68 - Small wholesale units. Hawkins\Brown Co-Location study



Figure 69 - BSSA4 Site Allocation Boundary Map

6.4 BSSA4: Chapman’s and Sapcote Estate

Policy Requirements

Strategic Objective

Residential development and workspace will be directed towards Colin Road and the High Road. The industrial function of Sapcote Trading Centre and Chapman’s Park Industrial estate will be protected and intensified.

**Indicative Homes**

Indicative target of 300 homes, to provide a mixed community including affordable housing (target 50% affordable, with a 70:30 social/ intermediate split) 25% family (3bed+) housing. New residential uses are to be located towards the High Road, avoiding new development that is surrounded by industrial uses.

**Green, Open and Play Spaces**

Due to the nature of the site there is limited scope for introducing new green spaces. Landscaping improvements should be focussed on the adjacent stretch of High Road and tree planting and greening maximised throughout the site. Financial contributions will be required towards open space off-site and play provision.

**Industrial Spaces and Affordable Workspaces**

Retain existing businesses within Sapcote Trading Centre, ensuring industrial floorspace is re-provided and intensified. 10% of new industrial floorspace is to be affordable.

**Community Spaces**

New workspace to be delivered within Willesden Workshop site is to provide a business support function and deliver community benefits.

**Planning Considerations**

Air Quality Management Area, Partly within Flood Zone 3a due to Surface Water Flooding.

**Building Heights**

Buildings heights to vary between 1-10 storeys. Development will need to address the close proximity to the residential homes at Erick Road, minimising impact of massing.

## 6.4 BSSA4: Chapman's and Sapcote Estate

### Proposed Framework

#### Design Principles

- Create active frontages along the High Road, helping to join up disparate clusters of retail, commercial and industrial uses in the surrounding area;
- Service routes, carriageways and yards are largely maintained and consolidated. Where service routes are shared with pedestrians and cyclists a buffer of trees and planting should separate the modes where possible;
- Provide amenity spaces internally and/or at roof level, given the site constraints;
- Minimise the impact of new development on the day-to-day operation and servicing of the existing businesses.

#### Proposed Massing

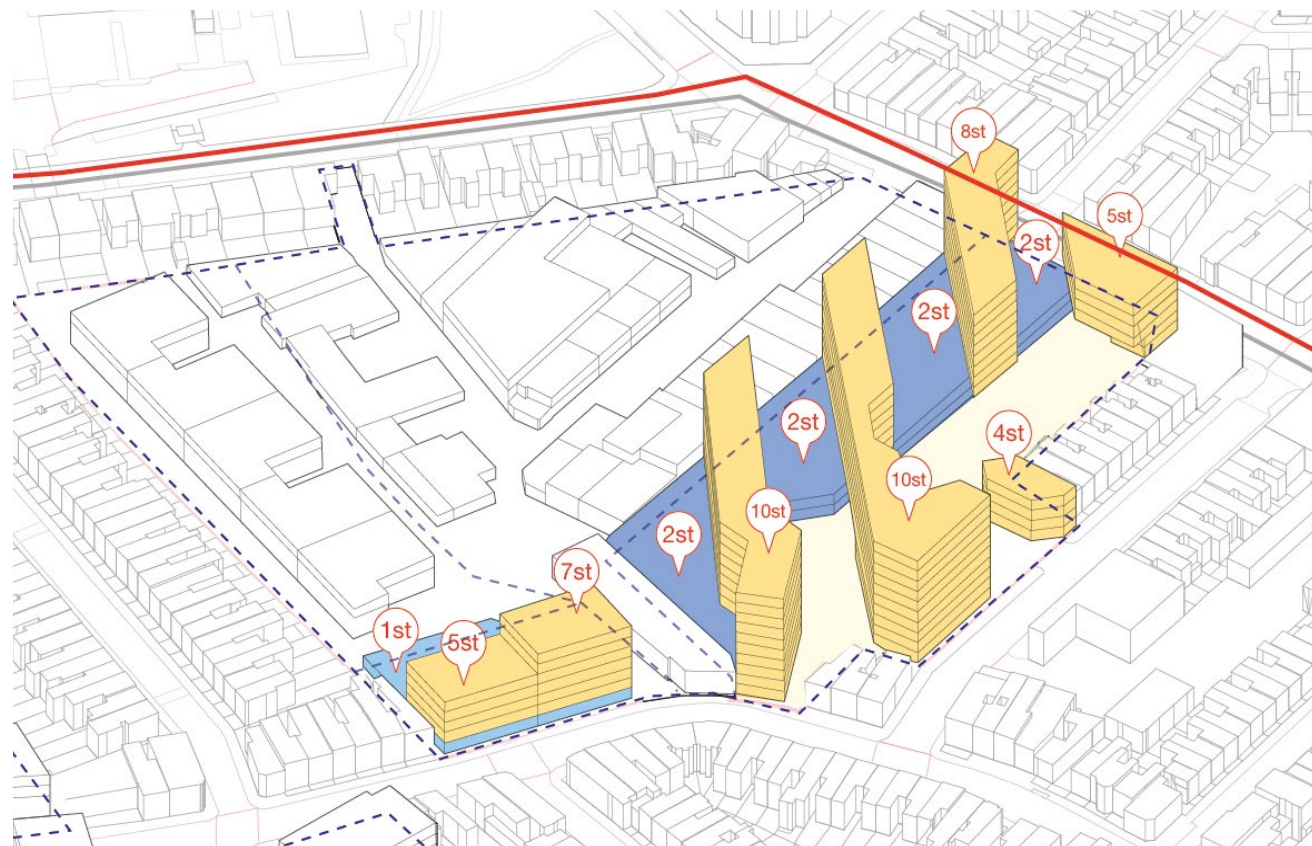
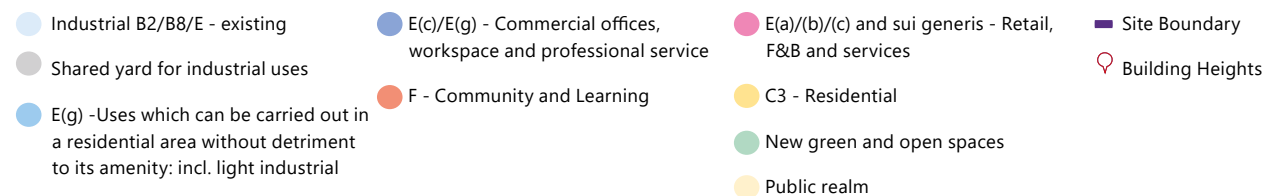


Figure 70 - Proposed Massing BSSA4 indicating 8-10 storeys in the middle of the site and 1-5 storeys adjacent to existing properties. Hawkins\ Brown Masterplan Report





# 6.5 BSSA5: Willesden Bus Depot





# 6.5 BSSA5: Willesden Bus Depot

## About The Site

### Site Summary

Item	Description
About the site	The site comprises a Transport for London Bus Depot and the long-term vacant Crown Public House.
Site area	0.99ha
Built floorspace	5,493sqm
Businesses	1
Jobs	137-183 (HCA official estimate)
Existing homes	0



Figure 71 - Sideway Entrance. Street view



Figure 72 - The Crown Pub. Street view



Figure 73 - BSSA5 Site Allocation Boundary Map

## 6.5 BSSA5: Willesden Bus Depot

### Policy Requirements

#### Strategic Objective

Retention of bus depot, and relocation of existing offices to the High Road with new residential uses above. Redevelopment of the disused Crown pub on High Road to re-provide a community/ pub/employment function at ground floor, with new residential uses above.



#### Indicative Homes

Indicative target of 60 homes, to provide a mixed community including affordable housing (target 50% affordable, with a 70:30 social/ intermediate split), 25% family (3bed+) housing. Locate new residential uses towards the High Road, avoiding new development that is surrounded by industrial uses.



#### Industrial Spaces and Affordable Workspaces

Retain the existing bus garage function, identifying opportunities for increased stabling provision and considering the spatial requirements arising from electrification. Relocation of existing offices to release more space for parking to serve the bus depot.



#### Planning Considerations

Air Quality Management Area, Contamination Risk, impact on setting of heritage assets.



#### Green, Open and Play Spaces

Due to the nature of the site there is limited scope for introducing new green spaces. Instead the focusThis should be focussed on im-provements to the adjacent stretch of High Road which suffers from narrow pavements and restricted space for a heavily used bus stop. Financial contributions will be required towards open space andoff-site. play space off-site.



#### Community Spaces

The pub or alternative community function should be retained through meanwhile use and redevelopment of the vacant Crown Public House (approx. 480sqm). Should the loss of the public house use be justified under policy BHC5, the preferred alternative use is community use and/or employment floorspace.



#### Building Heights

Buildings heights to vary between 5-7 storeys. The Bus Depot site is adjacent to residential terraces, so massing should be treated carefully.

## 6.5 BSSA5: Willesden Bus Depot

### Proposed Framework

#### Design Principles

- Create active frontages along the High Road, helping to join up disparate clusters of retail, commercial and industrial uses in the surrounding area.
- Activate the vacant public house through the provision of 'meanwhile' uses, retaining public-facing uses at ground floor level and exploring the potential for residential uses above.
- The retention of the Edwardian entrance and war memorial is strongly encouraged. Development should take influence from the positive characteristics of the heritage assets within and surrounding the site. The Crown, a former Edwardian public house in the Tudorbeathen style, is also a building of townscape importance.
- Explore the potential for amenity spaces internally and/or at roof level, given the site constraints.
- Minimise the impact of new development on the day-to-day operation and servicing of the existing businesses.

#### Proposed Massing

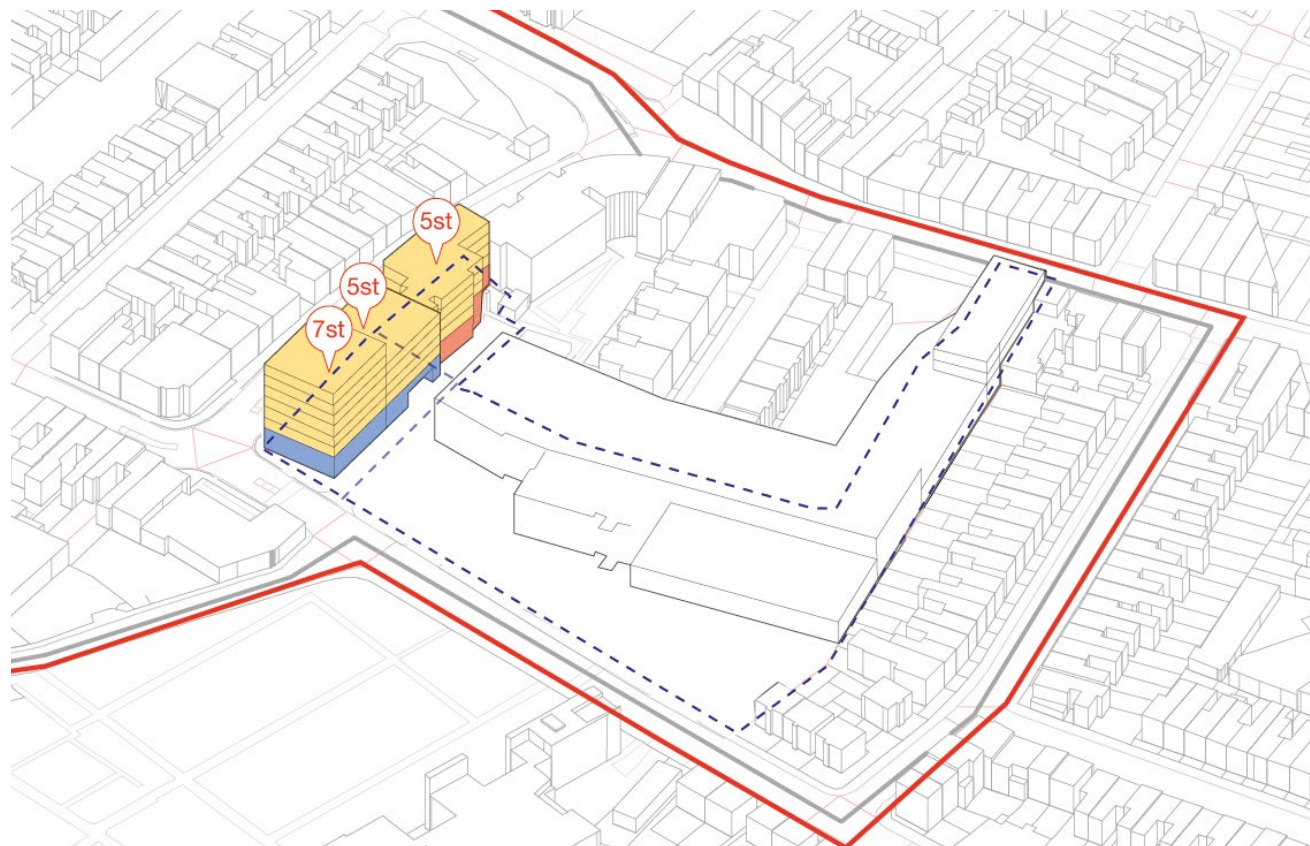



Figure 74 - Proposed Massing BSSA5 indicating 5-7 storeys facing the High Road. Hawkins\Brown Masterplan Report

- E(c)/E(g) - Commercial offices, workspace and professional service
- F - Community and Learning
- C3 - Residential
- Site Boundary
- Building Heights



An aerial photograph of a city neighborhood. In the foreground and middle ground, there are several modern, multi-story buildings with flat roofs and large windows. Some of these buildings have green roofs. In the background, there is a dense cluster of older, traditional houses with gabled roofs and brick walls. The image is overlaid with a semi-transparent green filter. The text '6.6 BSSA8: McGovern's Yard' is prominently displayed in the upper left quadrant.

# 6.6 BSSA8: McGovern's Yard



6.6 BSSA8: McGovern’s Yard

About The Site

Site Summary

Item	Description
About the site	The site comprises light industrial uses around a central car park and servicing area. Key occupiers include Slocombes vehicle servicing and McGovern Haulage Ltd.
Site area	0.37ha
Built floorspace	1,402sqm
Businesses	1
Jobs	137-183 (HCA official estimate)
Existing homes	3



Figure 75 - Access from Colin Road. Street view



Figure 76 - View from Meyrick Road. Street view

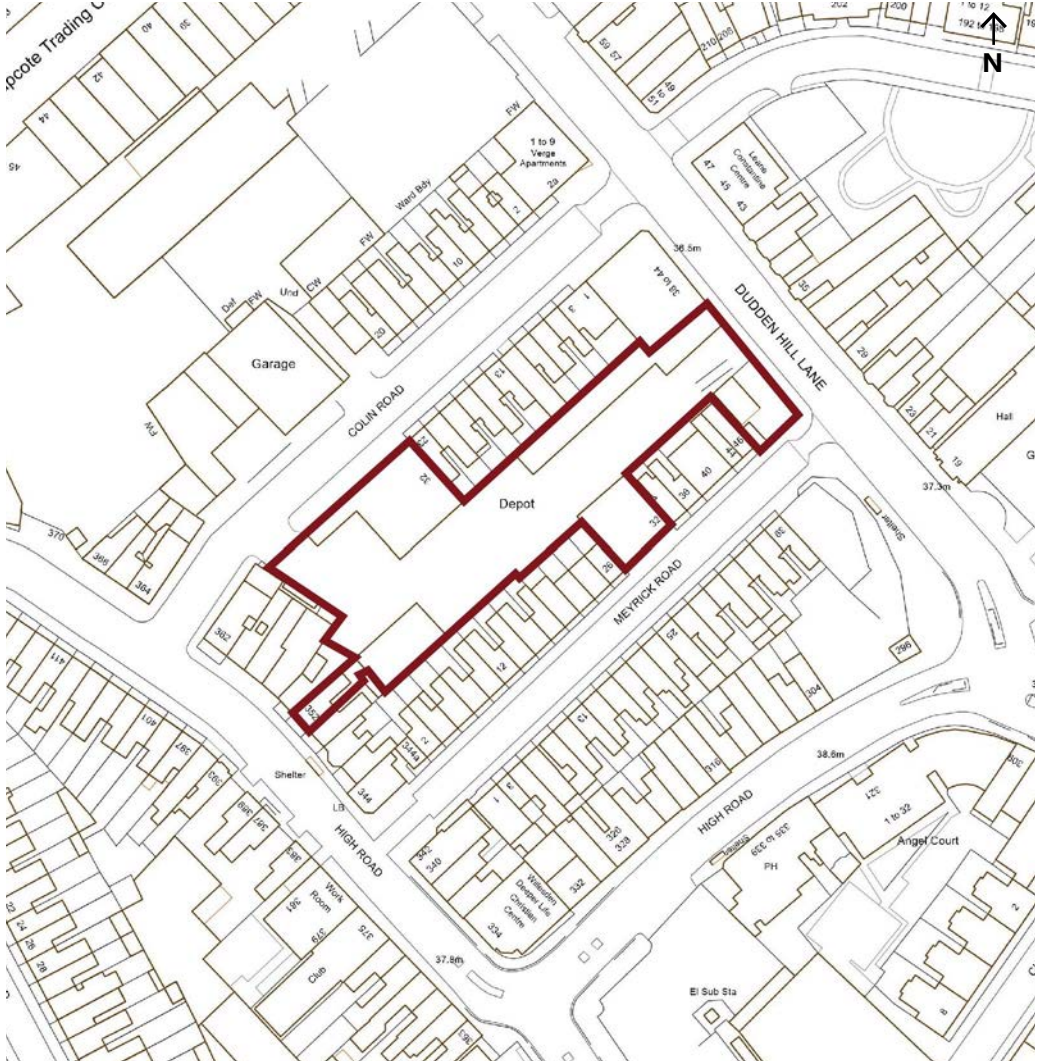



Figure 78 - BSSA8 Site Allocation Boundary Map

6.6 BSSA8: McGovern’s Yard


Policy Requirements

Strategic Objective


Deliver a mixed-use development to re-provide light industrial uses with residential above. and introduce new local amenity and work-space.

**Indicative Homes**

Indicative target of 45 homes, to provide a mixed community including affordable housing (target 50% affordable with a 70:30 social/ intermediate split) and 25% family (3bed+) housing.

**Industrial Spaces and Affordable Workspaces**

Re-provide industrial uses where possible with an aim to increase industrial floorspace.


**Planning Considerations**

Air Quality Management Area, Contamination Risk.


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**Green, Open and Play Spaces**

Due to the nature of the site there is limited scope for introducing new green spaces. Financial contributions will be required towards off-site open space and play provision.

**Community Spaces**

Due to the nature of the site there is limited scope for introducing new community spaces.

**Building Heights**

Buildings heights to vary between 2-7 storeys. Development will need to be sensible to the adjacent residential homes.

## 6.6 BSSA8: McGovern's Yard

### Proposed Framework

#### Design Principles

- Create active frontages along the High Road, helping to join up disparate clusters of retail, commercial and industrial uses in the surrounding area.
- Activate the vacant public house through the provision of 'meanwhile' uses, retaining public-facing uses at ground floor level and exploring the potential for residential uses above.
- The retention of the Edwardian entrance and war memorial is strongly encouraged. Development should take influence from the positive characteristics of the heritage assets within and surrounding the site. The Crown, a former Edwardian public house in the Tudorbeathen style, is also a building of townscape importance.
- Explore the potential for amenity spaces internally and/or at roof level, given the site constraints.
- Minimise the impact of new development on the day-to-day operation and servicing of the existing businesses.

#### Proposed Massing

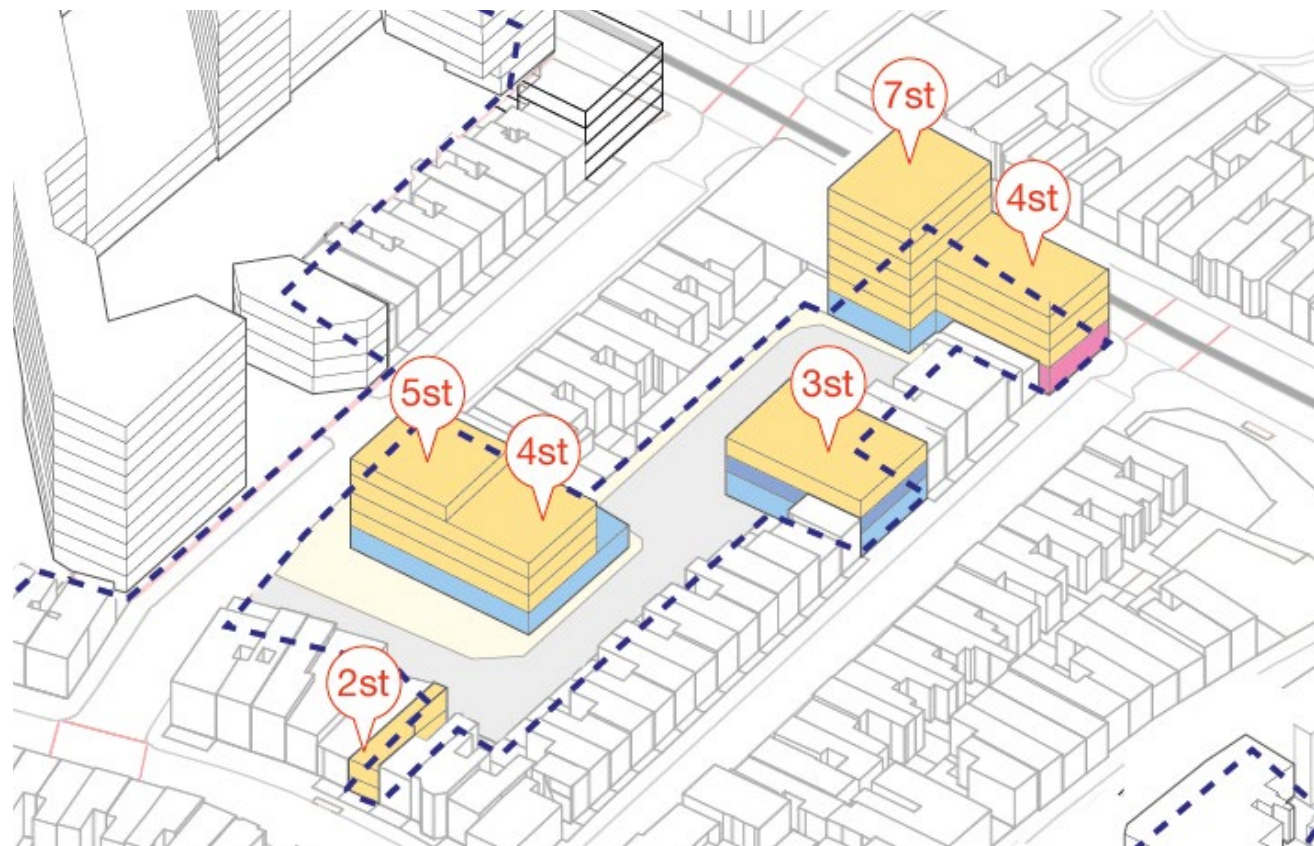
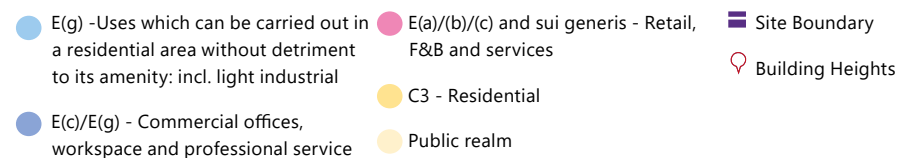


Figure 79 - Proposed Massing BSSA8 indicating 5-7 storeys in key locations and 2-3 storeys adjacent to existing properties. Hawkins\Brown Masterplan Report





# 7.0 Delivery Approach and Phasing

- 7.1 Community Involvement in Decision Making
- 7.2 Land Ownership
- 7.3 Land Consolidation Strategy
- 7.4 Indicative Phasing
- 7.5 Decant and Business Relocation Strategy

## 7.1 Community Involvement

7.1.1 Community engagement and ownership will be key to the successful realisation of the vision for CEGA. Developers are required to adopt a clearly-articulated approach to community engagement, taking into account the diversity of Church End's community. As English may not be the first language, engagement materials should be communicated through a combination of clear visual material and summary text highlighting key information. A hybrid approach is needed which combines both digital and in person engagement, as many residents and workers do not have access to or use digital consultation platforms.

7.1.2 Lessons learnt from the initial masterplanning work, which developers should draw on include:

- Hybrid approach: Combining both digital and in person engagement, as many residents and workers do not have access to or do not use digital consultation platforms.
- Existing networks: Partnerships with community groups should be facilitated, including to help engage harder to reach groups.
- Translate the process of change to individuals and lives: 'Day in the life' type scenarios are useful to translate the conditions before and after regeneration.
- Diverse audiences: As English may not be the

first language, engagement materials should be communicated through a combination of clear visual material and summary text highlighting of key information.

7.1.3 Mechanisms to promote community ownership of workspace, community and cultural facilities and public space are strongly encouraged. Developers should seek to co-design these spaces in collaboration with local people, including young people. Community Agreements will be secured setting out how local people and existing community groups will be engaged in the operation of new Use community spaces and meanwhile uses. This could include through involvement in the development of a programmes of services and activities. In the case of cultural or employment uses, training and employment opportunities for local people will also be secured.



Figure 80 - CEGA Masterplan - Autumn Exhibition

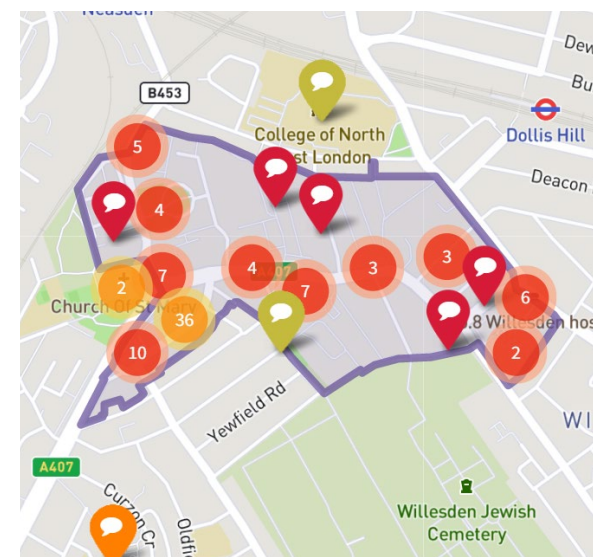


Figure 81 - Church End Common Place platform outcomes



7.2 Land Ownership

7.2.1 The total combined area of the CEGA site allocations is approximately 11ha. 53% of this land is owned by seven landowners, only two of which are public bodies. Larger sites within the site allocations that are under single ownership will typically tend towards early redevelopment than sites under multiple ownerships.

7.2.2 Many sites however suffer from fragmented ownership, including Cygnus Business Park, Sapcote Industrial Estate and the Cobbold and Trojan Estates. Fragmented ownership also provides a barrier to redevelopment within the Town Centre. A summary of the phasing and delivery strategy for each site allocation including land ownership, leasing arrangements and risk analysis is included in Appendix F.

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- Key
- Brent Freehold
  - Public Sector Freehold
  - Other: Freehold
  - Other: Leasehold
  - Unknown Freehold
  - Unknown Leasehold
  - Unknown



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Figure 82 - Land Ownership map



## 7.3 Land Consolidation Strategy

7.3.1 The masterplan approach to land consolidation, with phasing informed by the following factors:

- **Building on existing appetite and enthusiasm** by planning and promoting sites where landowners have already shown interest in redevelopment.
- **Focus on larger sites in single ownership** including key sites within all the main five site allocations.
- **Prioritising buildings that are derelict or in poor condition** or are underutilised e.g. Neasden Studios and The Crown.
- **Prioritising council-owned sites and land adjacent** to them e.g. Brent Business Park and adjacent sites on Trojan Estate.
- **Identifying where floorspace could be increased** significantly to support redevelopment and to justify the financial resources required to negotiate land consolidation.

### Key

- Sites under single private ownership
- Sites under multiple and fragmented ownerships
- Single ownership of public body / local authority
- Highways under local authority ownership

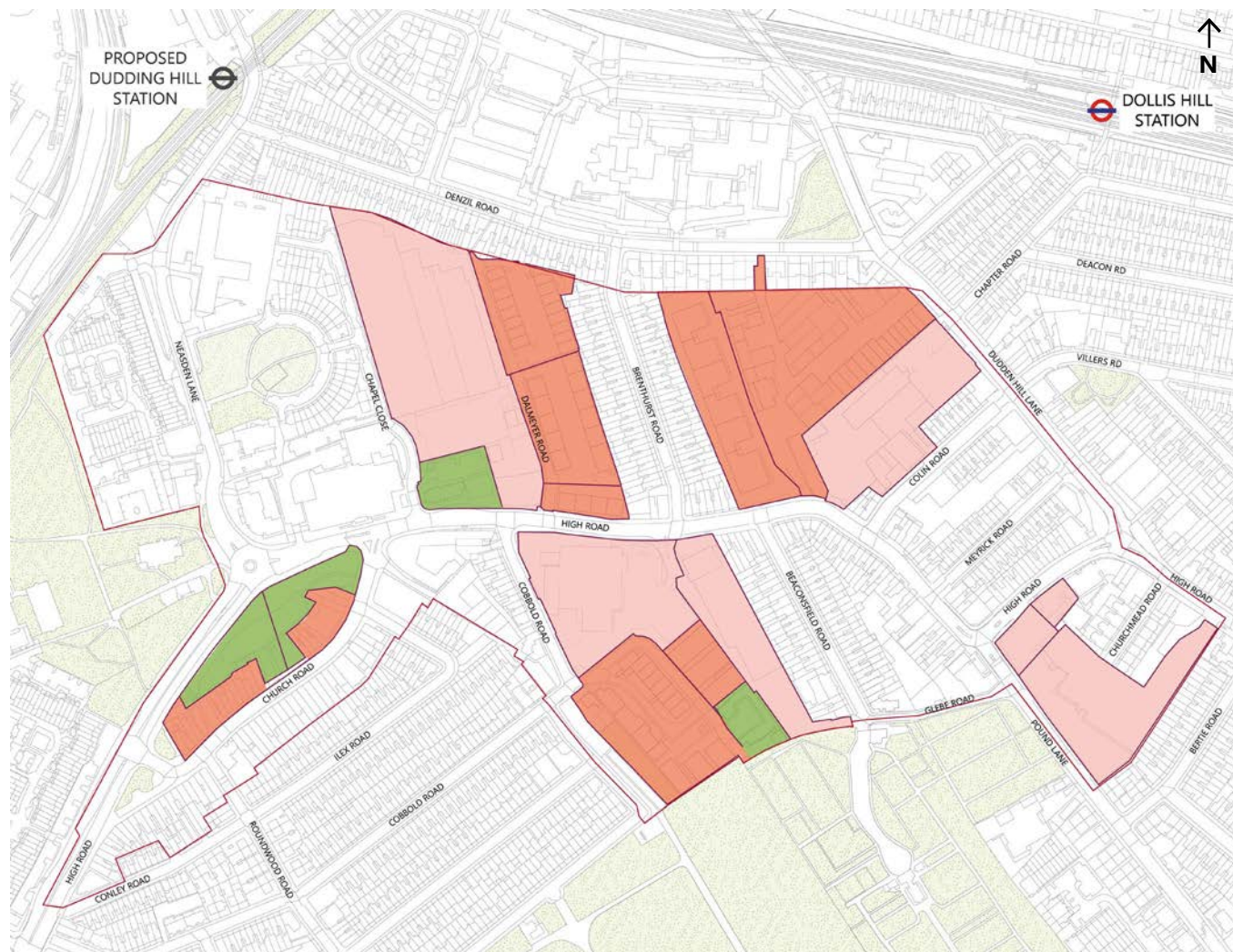


Figure 83 - Site consolidation approach. Adapted from Hawkins\Brown Masterplan Report



## 7.3 Land Consolidation Strategy

7.3.2 The Council will use a variety of methods to incentivise delivery with the CEGA, reflecting the particular circumstances of the sites:

Church End  
BSSA3 Residential  
design guide



### Design guide and framework for extensions:

This provides greater clarity and guidance on what is appropriate development within Church End Town Centre, identifying different opportunities available on the north and south side of Church Road.

### Partnerships with developers and/or housing associations:

The Council has a track record in delivering affordable housing. It also has a history of partnering with other organisations, such as housing associations, or developers where appropriate.

### Promotion and engagement with landowners:

Early conversations between the Council and key landowners were initiated as part of the masterplan and that process will continue through statutory consultation and post adoption of the masterplan SPD.

### Investment in key infrastructure projects:

Schemes identified in the Council's Infrastructure Delivery Plan (IDP), this CEGA Masterplan SPD or other programmes, to better facilitate the redevelopment of key site allocations.

### Compulsory Purchase Order (CPO):

A mechanism of **last** resort, CPO will only be used where necessary to deliver Council supported regeneration and development otherwise being undermined by unreasonable demands from site owners.

## 7.4 Indicative Phasing

### Phase 1: 3-5 years

The north of BSSA3 Church End Local Centre is Council-owned, has planning permission and is due to come forward for delivery. In addition, industrial land within BSSA4 Chapman's and Industrial Estate, and 28-31 High Road, have been subject to detailed

design and planning work and have the potential to come forward within 3-5 years. Finally, the vacant Crown Public House within BSSA5 Willesden Bus Depot site could come forward as a meanwhile use in the shorter-term.



Figure 84 - Phase 1: 3-5 years. Hawkins\Brown Masterplan Report



## 7.4 Indicative Phasing

### Phase 2: 6-11 years

Taking into account landownership and engagement, BSSA1 Asiatic Carpets and parts of BSSA4 Chapman and Sapcote Estate could come forward in 6 to 11 years. Units within Cygnus Business Estate to the east are retained and enhanced. Within BSSA4 it

is envisaged the majority of industrial stock will be retained and enhanced, but there is potential for redevelopment of the industrial unit facing the High Road. On BSSA5 there is also potential for intensification through relocation of the bus depot offices.

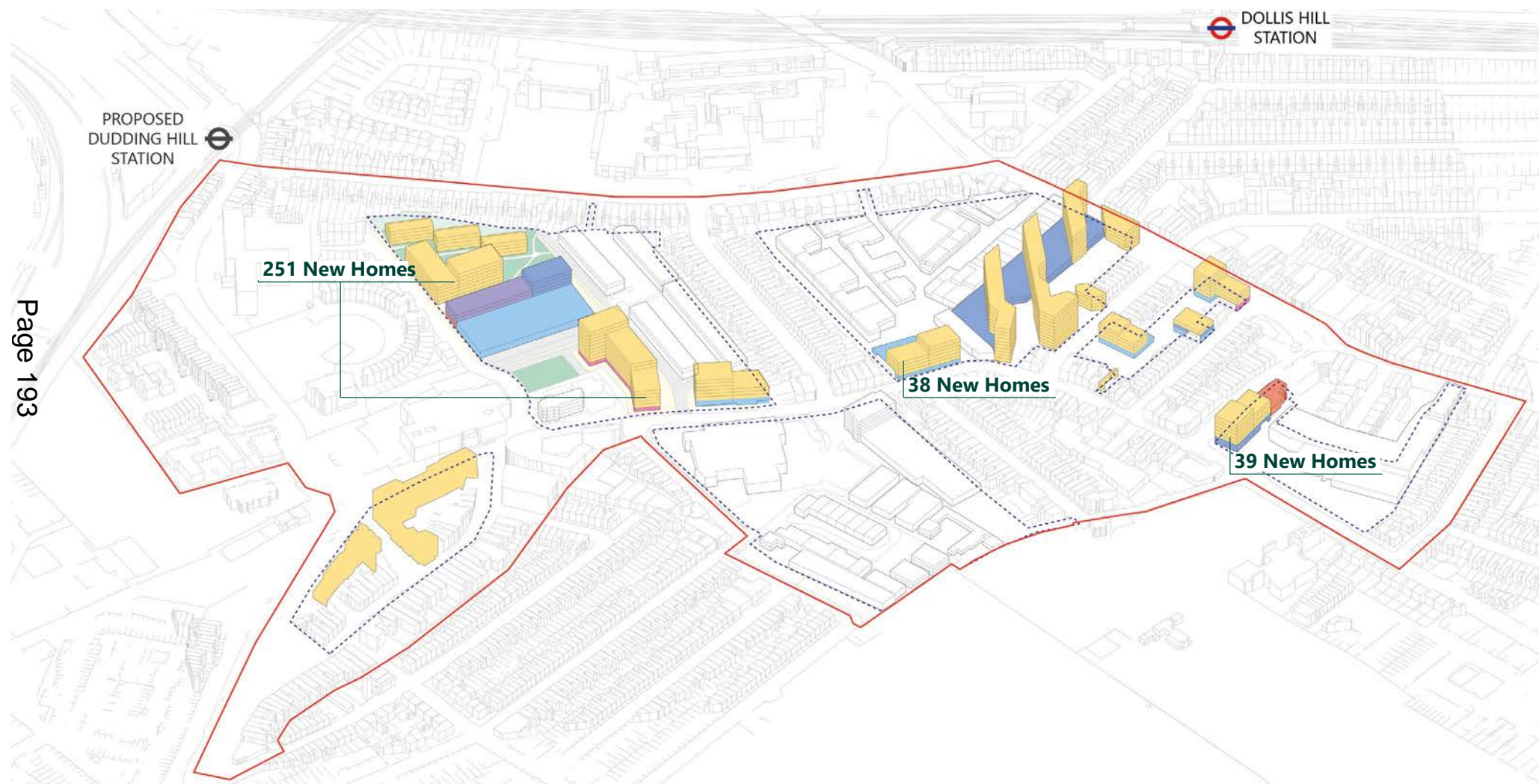


Figure 85 - Phase 2: 6-11 years. Hawkins\Brown Masterplan Report

## 7.4 Indicative Phasing

### Phase 3: 11-15 years

BSSA2 B&M Homes Store are considered more likely to come forward within 11-15 years. Cobbold Industrial Estate is largely fragmented across multiple ownerships and supports a range of valuable local industrial jobs. MP Moran and Sons is another

important local industrial employment site. As such, it is envisaged these sites will remain in industrial use. Given the fragmented ownership within Church End Local Centre, would come forward site by site through individual site development.

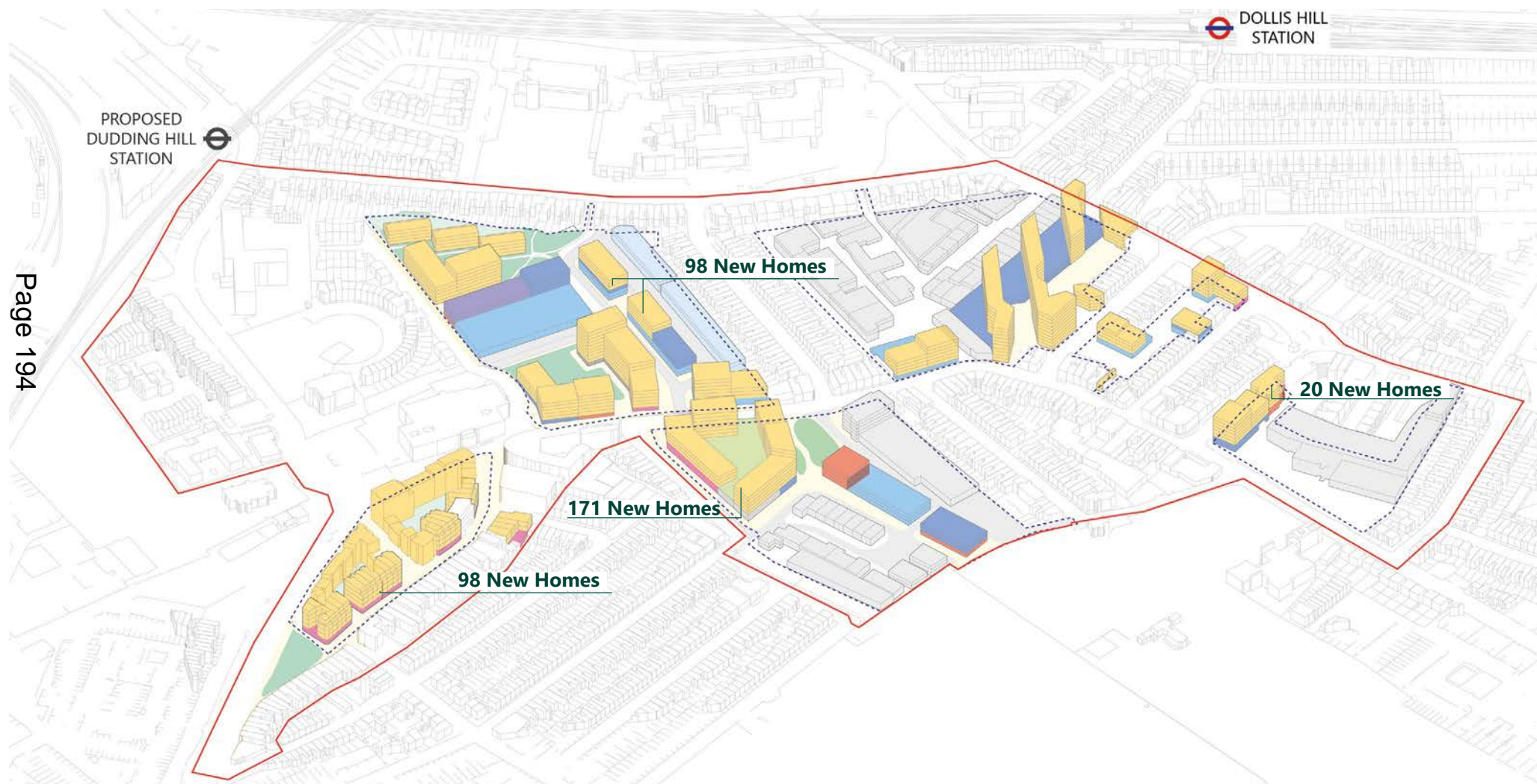


Figure 86 - Phase 3: 11-15 years. Hawkins\Brown Masterplan Report



## 7.5 Decant and Business Relocation Strategy

7.4.1 Redevelopment proposals within CEGA should include plans to retain businesses in the area and protect local employment. Most businesses are concentrated in Cygnus Business Park and Chapman's and Sapcote Estates. Redevelopment and intensification on these sites should be phased to aim for a comprehensive re-location strategy. Land that is less actively used will be more appropriate for earlier phases and can provide decant capacity to accommodate local businesses and thereby unlocking further redevelopment.

7.4.2 Development impacting industrial sites is to be supported by a Business Relocation Strategy demonstrating

**Detailed understanding of existing businesses on site:** This includes their type of activity/use class, potential compatibility with proposed land uses, their market area, number of employees and lease arrangements.

- **Early engagement with businesses:** It is essential to ensure that new spaces are aligned with the needs of existing businesses. Early engagement with businesses should establish if they wish to be retained on site or relocated, and what their requirements are in terms of location, size and type of premises required, fit out and servicing requirements. Where a business wishes to cease trading, then a signed statement form

the business confirming this position should be provided.

- **On-site retention strategy:** Set out how the applicant will work with businesses that wish to be retained to ensure on site provision meets their needs. In some circumstances retrofit or refurbishment of existing facilities may be appropriate. Where this is not feasible, engagement should inform typologies of space and affiliated infrastructure proposed. It should be ensured phasing is aligned to support retention, and ideally enable businesses to relocate only once. Consideration will also need to be given to how service access and yard space can be maintained during construction.

- **Off-site retention strategy:** Set out how the applicant will explore options with businesses who want or need to be relocated and confirmation of what assistance will be provided. This should confirm when relocation will need to occur and identify suitable alternative locations, with the following sequential approach: CEGA or NSGA, Brent, West London, the rest of London and beyond. The Council will monitor the progress of sites coming forward and decant strategies within both CEGA and NSGA. This will help to co-ordinate the decant process at a strategic level, with the aim of ensuring that businesses have an opportunity to stay and grow in the area.

7.4.3 The Council will monitor the progress of sites coming forward and decant strategies within both CEGA and NSGA. This will help to co-ordinate the decant process at a strategic level, with the aim of ensuring that businesses have an opportunity to stay and grow in the area:

## 7.5 Decant and Business Relocation Strategy

### Key

- Businesses remain as they are and improvements to the site with potential for accommodating decanted businesses
  - 1 - Sapcote Industrial Estate
  - 2 - MP Moran & Sons
  - 3 - Trojan and Cobbold Estates (partial)
  - 4 - Cygnus Business Park (partial)
  - 5 - Chapman Park Industrial Estate (partial)
  - 6 - Willesden Bus Depott
- Full site redevelopment with re-provision of existing business and potential for new businesses
  - 7 - Neasden Studios/Film Production studio
  - 8 - Probation Centre
- Re-location of businesses within CEGA or nearby industrial areas (NSGA/OPDC)
  - 9 - Cygnus Business Park (partial)
  - 10 - Chapman Park Industrial Estate (partial)
  - 11 - Trojan Industrial Estate (partial)
  - 12 - Brent Enterprise Park
  - 13 - R55 / Willesdem Workshop
  - 14 - McGovern's Yard
- Redevelopment of yard or unused space
  - 15 - Asiatic Carpets yard
  - 16 - Willesden Bus Depot yard
  - 17 - The Crown pub
- Town Centre individual site redevelopment with careful consideration of ground floor commercial unit's activities
  - 18 - Local Centre ground-floor units



Figure 87 - Business Relocation Strategy. Adapted from Hawkins\Brown Masterplan Report

\*There is a high level of vacancy within the town centre that should be activated. However, as the redevelopment of residential uses on a site-by-site basis will have an inherent impact on the ground floor commercial units, these changes need to be timed carefully to not impact business operations and with a view to re-housing occupiers where possible. However, it is worth noting that any redevelopment may incur rent increases, which in turn would exclude some existing businesses who depend on the current low rents.

# 8.0 Planning Process

- 8.1 Planning Process
- 8.2 Planning Applications
- 8.3 CIL/S106 Planning Obligations
- 8.4 Contacts
- 8.5 Acknowledgements

## 8.1 Pre-Application Discussions

- 8.1.1 The Council encourages early engagement to discuss proposals for development. It is recognised that to address particular site specific issues that developers might want or need to depart from some of its content. In these cases early engagement with the Council and communities and a clear narrative on why solutions are being proposed will be helpful. It is likely to reduce potentially abortive work and enable clarity from the Council on likely acceptable development schemes.
- 8.1.2 It is recommended that applicants consider the viability of a site at the pre-application stage. This will allow any issues around policy compliance to be resolved before the submission of a planning application.
- 8.1.3 Depending on the scale of the proposal, a planning performance agreement setting out the roles, responsibilities and a timeline for the pre-application, and application, process, may be applicable.
- 8.1.4 Meetings with councillors, and a pre-application presentation to the Planning Committee, may be applicable. Early engagement with the Council's Quality Review Panel (QRP) is highly recommended.

## 8.2 Planning Applications

- 8.2.1 A list of information to be submitted to ensure a valid application can be found at the Council's website.
- 8.2.2 The Council's Statement for Community Involvement (SCI) sets out the consultation methods that are strongly encouraged before submission of a planning application, in addition to items referenced on 7.5.1.
- 8.2.3 The Council will consult nearby occupiers and relevant stakeholders – in addition to statutory consultees, and responses will inform the Council's assessment of the proposals.
- 8.2.4 The Council's scheme of delegation – setting out what applications will be determined by the Planning Committee – is set out in the constitution.
- 8.2.5 The Council seeks to support schemes which will help to deliver on the Council's objectives as set out in the Local Plan and this document, and will enter into any negotiations positively with a view

## 8.3 CIL/S106 Planning Obligations

- 8.3.1 The mechanism to deliver wider infrastructure associated with CEGA will predominantly be through financial contributions received via the Community Infrastructure Levy (CIL). Where infrastructure relates to a site specific mitigation measure, its provision may be via a planning obligation, or conditions attached to the planning permission.
- 8.3.2 More details on CIL and S106 Planning Obligations can be viewed at the [Council's website](#).



## 8.4 Contacts

### Brent Council Planning and Regeneration Teams

London Borough of Brent

Brent Civic Centre

Engineers Way, Wembley HA9 0FJ

**Email:** churchend@brent.gov.uk

**Website:**

<https://www.brent.gov.uk/your-community/regeneration/church-end/>

**Other Supplementary Planning Documents can be found at the Council's website below:**

<https://www.brent.gov.uk/services-for-residents/planning-and-building-control/planning-policy/supplementary-planning-documents-and-guidance/>

## 8.5 Acknowledgements

The masterplanning exercise that informed the Masterplan SPD was undertaken by Hawkins\Brown Architects, with contributions from: Jan Kattein Architects; PJA Transport Planning; Ramidus and Propernomics consultants. BNP Paribas tested the masterplan's viability and deliverability.

Drawings and graphics were edited/adapted by Brent Council Regeneration Team.



# Appendices

**Appendix A - Church End Design Code**

**Appendix B - Case Studies**

**Appendix C - Consultation Statement**

**Appendix D - Additional Guidance**

**Appendix E - Social Demographic Data**

**Appendix F - Delivery Summary**

# Appendix A: Church Road Design Code



# Appendix B: Case Studies

## Appendix B - Case Studies



### Case Study : LLDC, London

The London Legacy Development Corporation commissioned several studies analysing the options to protect existing employment, including the LLDC Employment Space Study and the HWFI Design & Planning Guidance ruling to:

- Retain existing area for jobs
- Loss of B2/B8 uses not allowed
- Retain existing ecology of uses
- Safeguard SIL land
- Activate yards and frontages.

As planning authority the LLDC tries to make sure that land use change, including housing, should add to, rather than displace. Residential will have to demonstrate that industrial capacity is not compromised by maintaining or increasing its employment density. Housing developments finance the high cost of intensification.



### Case Study : Blackhorse Road, London

In 2013 the Upper Lee Valley Opportunity Area Planning Framework removed the SIL designation of the area north of Blackhorse Road Station and set a target of a minimum of 2550 new homes.

The adopted Urban Design Framework suggested a mixed use area which kept industrial uses in the neighbourhood. Private developers, however, were not willing to deliver the proposed mix of uses so that this approach was finally dropped in the adopted AAP. This caused a substantial loss of employment space.

The Urban Design Framework relied on private developers to deliver the industrial uses.

Industrial use could not compete with the value of residential developments.

# Appendix C: Consultation Statement

## Appendix C - Consultation Statement

The start of the Church End Masterplan/SPD consultation coincided during the Covid-19 pandemic lockdown, there was a need to adapt to online means of communication. This initial engagement was undertaken from February to Nov 2021.

Online consultation took the format of online interviews, commonplace and interactive workshops. The stakeholder interviews helped with bringing in-depth understanding and analysis of the existing social infrastructure, and to establish contacts for future consultation.

Hosting an interactive map on the CommonPlace platform provided a platform to exhibit our early findings, reach out to a wider cross-section of Brent residents to identify their priorities and attract further interest for future workshops.

Online interactive workshops presented the opportunity to involve stakeholders in process of developing the Masterplan brief. The workshops allowed us to test an emerging brief for social infrastructure and its application on the Church End Growth Area. It also helped build a picture of skills, training and employment requirements and demands in Church End.

The easing of government restrictions allowed for the safe a face-to-face consultation event in May. This took the form of a public street-side event at Willesden Market (Church Rd) and engagement with Leopold Primary

School. These events enabled the social infrastructure brief to be further tested, as well as reaching community members either reluctant or unable to engage online.

Later in the year, the team also delivered a two day exhibition event, on-site, which allowed the community to provide us with further comments in relation to the first designs drafted. This event was extended via an online survey within Brent's consultation hub: (1) Project • Church End Masterplan /Supplementary Planning D... (brent.gov.uk)

A summary of the engagement activities undertaken and their outcomes will be summarized once statutory consultation has resumed.



# Appendix D: Additional Guidance

## Appendix D - Additional Guidance

### Land Use

- Brent Borough Plan (2022)
- Brent Meanwhile Use Strategy (2021)
- Brent Affordable Workspace Strategy (2020)
- Brent Poverty Commission Report (2020)
- Brent Black Community Action Plan (2020)
- Brent Inclusive Growth Strategy (2019-2040)
- Brent Infrastructure Delivery Plan (2019)
- West London Employment Land Evidence (2019)
- Brent Indoor Sports & Leisure Facilities Needs Assessment (2018)
- Brent Strategic Housing Market Assessment (2018)
- GLA Industrial Intensification and Co-location Study (2018)

### Movement and Connectivity

- Brent Long Term Transport Strategy (2015-2035) (2021 Review)
- TfL Mayor's Transport Strategy (2018)
- TfL Vision Zero Action Plan (2018)

### Green and Open Spaces

- Brent Health and Wellbeing Strategy (2022-2027)
- Brent Food Growing and Allotment Strategy (2012)TBC
- Brent Open Space, Sports and Recreation Study (2019)
- Brent Council Indoor Sports and Leisure Facilities Needs Assessment (2018)
- The London Food Strategy (2018)
- GLA Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
- GLA Urban Greening Factor LPG (draft) (2021)
- Sport England's Design Guidance (web link)
- Natural England Biodiversity Metric, Small Sites Metric (SSM) and Environmental Benefits from Nature Tool (EBNT)
- Fields In Trust Guidance for Outdoor Sport and Play (2020)

### Building and Architecture

- Brent Design Guide SPD1 (2018)
- Brent Tall Buildings Strategy (2019)
- Church Road Design Code (2022) – Appendix X
- Church Road Shop Frontages Design Guide (2022) – Appendix X

### Climate Change and Sustainability

- Brent Climate & Ecological Emergency Strategy (2021-2030)
- West London Strategic Flood Risk Assessment
- West London Waste Plan (2015)
- GLA Air Quality Positive LPG (2022) (draft)
- GLA Air Quality Neutral LPG (2022) (draft)
- GLA Be Seen energy monitoring LPG (2021)
- GLA Circular Economy statements LPG (2021) (draft)
- GLA Circular economy statements LPG (2020)
- GLA Using Green Infrastructure to protect people from Air Pollution (2019)
- GLA London Environment Strategy (2018)
- GLA London Sustainable Drainage Action Plan (2016)
- GLA The Control of Dust and Emissions During Construction and Demolition SPG (2014)
- Transport for London SUDS in London: A Guide (2016)
- Urban Design for London Designing Rain Gardens: A Practical Guide (2018)
- Homes England Building for a Healthy Life (2020)
- CIRIA The SUDS Manual (2015)

# Appendix E: Social Demographic Data

Appendix E - Social Demographics

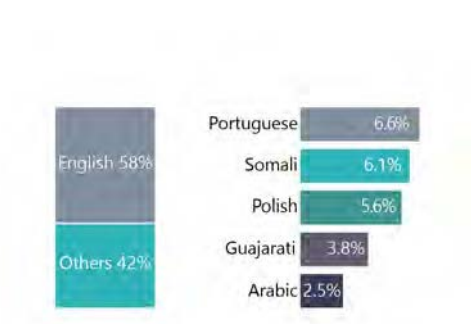
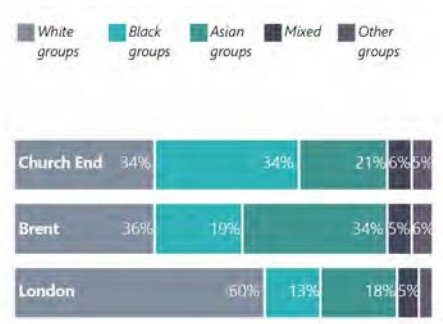


Figure X - Population Count, Source: ONS, Estimate for 2020 / Household count, Source: CACI Ltd, estimate for 2020

Figure X - Ethnic Groups, Source: ONS, Estimate for 2020

Figure X - Languages spoken, Source: ONS, 2011 Census (Table QS204). Persons aged 3 and over

Figure X - Household income, Source: ONS, Estimate for 2020

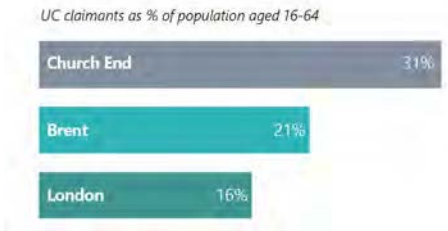
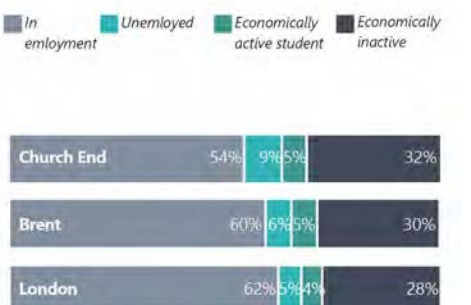
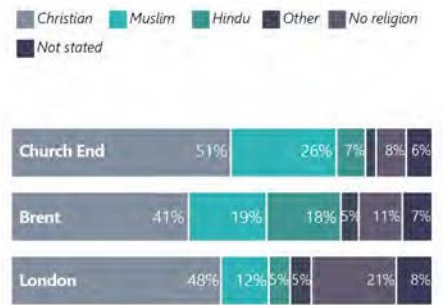
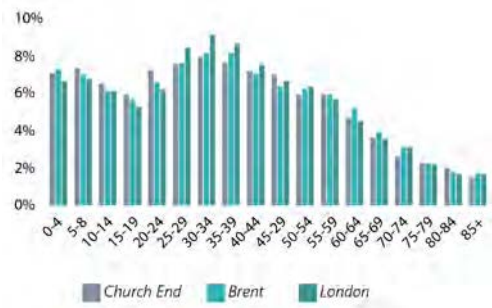


Figure X - Population by age, Source: ONS estimates) - 2020 estimates

Figure X - Religions estimate for 2021

Figure X - Economic Activity, Source: CACI Ltd, estimate for 2021

Figure X - Universal Credit Claims, Source: ONS, 2011 Census (Table QS204). Persons aged 3 and over



# Appendix F: Delivery Summary

## Appendix A - Delivery Summary

BSSA1

Development site	Phase (yrs) 3 / 5 / 10 / 15	Housing delivery	Employment floorspace	Additional conditions	Viability status	Agent of Change considerations	Ownership and land assembly*	Business decant and relocation**	Delivery route	Project partners	Community involvement	Risks / Considerations
28-31 High Road	●	41	843 m2 new industrial	Retain service yard	Viable	Impact on neighbouring residential uses by re-provided industrial - noise, servicing, nuisance creating activity	4 x Freehold  Collective planning application from multiple landowners. This excludes ones of the landowners and may hinder future development of site.	4 existing businesses x Light industrial in low-spec stacked spaces, with yard access and attached office space above (to be re-provided)  Owner-occupied businesses intend to return to operate from site	Collective planning application from multiple landowners. Council incentive may be needed to include additional adjacent landowner.	n/a	n/a	- risk of lack of consensus between landowners - impact on operations for Cygnus Business park and main service access - new residential uses could conflict with adjacent service yard and industrial businesses
Asiatic Carpets	●	245	3,080 m2 new light industrial 2,784 m2 new affordable workspace 2,880 m2 new commercial workspace	New hub for creative industries and media production, with affordable workspace and 928 m2 community space		Impact on neighbouring residential uses by re-provided industrial uses- noise, servicing, nuisance creating activity, night-time servicing, conflict with pedestrians and cyclists along proposed north-south cut-through	1 x Freehold  with interest to redevelop site	2 existing businesses x Carpet warehouse and film production studio in large volume, low-spec warehouse space. Both need service yard, loading space and access, with film studio needing considerable parking  Consideration for temporary re-location or pause in operations of Neasden Studios and new permanent storage facilities for carpet warehouse	Single landowner and developer bringing forward site. Current proposals assume inclusion of Cygnus Business Park and Probation Centre, which have not yet been engaged.	Workspace operators, community organisations, creative industries, existing businesses GLA, housing associations (for affordable / social rent)	Potential for collaborative design for community space, workspace and new public spaces. Where possible, community uses and public spaces should champion community ownership. Engagement with adjacent land parcels	- no policy requirement for re-provision of industrial or commercial floorspace - temporary closure or relocation of film studio could lead to permanent loss
Cygnus Business Park	●	41	4,126 m2 retained industrial 4,950 m2 new light industrial	Retain service yard and maintain operations for eastern units.  Mix of new and existing light industrial, creative workspace and studio space		Impact on neighbouring residential uses by re-provided industrial uses- noise, servicing, nuisance creating activity, night-time servicing, conflict with pedestrians and cyclists along proposed north-south cut-through	35 x Freehold and Leasehold  Multiple and fragmented ownerships, likely to need incentivising for redevelopment and additional council supports for collective strategy	30+ existing businesses x Mix of light industrial and multiple sectors in small, low-spec units. All units make use of yard and need loading and parking space.  Relocation of existing units in available sites in CEGA and NSGA, or the temporary relocation of business to be rehoused in future development on impacted sites.	Collective planning applications from multiple landowners or council-led acquisition  Private developer led site assembly	Existing businesses GLA, housing associations (for affordable / social rent)	n/a	- engagement with owners and occupiers on eastern edge of site where no development is proposed - they will need to be equal stakeholders in development process
Probation Centre	●	68	968 m2 re-provided floorspace for Probation Centre	450m2 of community space to support Probation Centre and affiliated organisations		Impact on neighbouring residential uses by re-provided industrial uses- noise, servicing, nuisance creating activity, night-time servicing, conflict with pedestrians and cyclists along proposed north-south cut-through	1 x Freehold by public body  no immediate plans of redevelopment. May need council incentive and additional support through NCIL / community supports	1 existing occupier x Needs to be in proximity of Magistrate's Court and continue operations (temporarily) near to existing site  Temporary re-location of Probation Centre, potential within site allocation in vacant or meanwhile space	Potential partnership between council and public body.	Probation Centre, affiliated organisations, community organisations, GLA	Potential for collaborative design for community space	- risk of lack of incentive for development till building condition deteriorates or no longer fit for purpose

\*Based on Ownership data provided by LB Brent, please refer to Chapter 3.14

\*\*Please refer to Chapter 3.15 for parameters guiding building type, sector, floorspace etc.

# Appendix A - Delivery Summary

BSSA2



Development site	Phase (yrs) 3 / 5 / 10 / 15				Housing delivery	Employment floorspace	Additional conditions	Viability status	Agent of Change considerations	Ownership and land assembly*	Business decant and relocation**	Delivery route	Project partners	Community involvement	Risks / Considerations
B&M Bargains					171	3,036 m2 re-provided supermarket 1,855 m2 for new Community Health Hub	Podium car parking on remaining ground floor. Small scale retail/cafe use to plug into Health Hub.	Viable	The site fronts working industrial sites and therefore needs to be considerate of active vehicular entrance for MP Moran and Sons to east, as well as service vehicles using Cobbold Road to access industrial estates to the south	1x Freehold  Owned by HSBC pension fund and locked into current lease for the medium-long term. However, there is potential to unlock site for residential development after 15 years. This is also when a potential health hub may be required, dependent on Brent CCG recommendation. Parcelling with adjacent sites (below) required for coordinated development with new industrial and community uses, and minimising ongoing impact on adjacent sites.	1 existing business x Wholesale / supermarket in large warehouse. May require car parking and loading vehicle access, service yard can be constrained within building.  No business relocations proposed - re-provision of supermarket use on site.	Potential partnership with council owned assets and other adjacent development sites. This may need support and co-ordination from the council to ensure a cohesive development.	Community organisations, GLA, Housing Associations, Brent CCG	Potential for collaborative design for Health Hub, with potential outpost for community enterprise in retail unit.  Potential for collaborative design elements on public space and garden.	- single landowner uninterested in developing the site - Development of site on it's own (not in combination with Trojan Estate and Brent Enterprise Park) may restrict development on those more secluded sites
Trojan Estate (partial)					0	3,780 m2 new industrial kitchens	Service yard and 24/7 access needed		Impact of new industrial uses, mainly noise, odours and service traffic, needs to be carefully managed if using same access as MP Moran and Sons. Consideration of proximity to residential uses proposed at B&M Bargains site.	Est. 3 x Freehold  Acquisition by the council or by B&M Bargains landowners may better facilitate integration with adjacent development sites.	3 existing businesses x Light industrial in medium sized warehouse spaces, consisting of wholesale distribution and catering. They all need yard space for loading and car parking, the catering business will need appropriate ventilation.  Relocation of existing catering and distribution businesses, preferably within Cobbold Estate.	Potential partnership between council, landowners at B&M Bargains  Private developer led site assembly	Workspace operators, existing catering businesses, GLA, local skills and training services	Potential for new light industrial uses to plug into local skills and training provision, building on catering as a growth sector for local employment	- risk of lack of consensus between landowners - risk of one (or more) of the landowners unwilling to redevelop - risk of council intervention antagonising adjacent owners and occupiers
Brent Enterprise Centre					0	1,800 m2 new light industrial / workspace 900 m2 new community space	Service yard and external use for community space		Impact of new community uses, mainly noise and potential for anti-social behaviour need to be carefully managed. Servicing may use same access as MP Moran and Sons or Cobbold Estate and overlap needs to be mitigated for community use.	1x Freehold  Council-owned site provides opportunity for exemplar project reflecting local needs and use	Approx. 15 existing businesses x Light industrial in small, low-spec warehouse spaces. Use of shared car park and service yard.  Relocation of existing units in available sites in CEGA and NSGA,	Council-led development, but could benefit from partnering/ parcelling with adjacent developments at B&M Bargains and Trojan Estate	Existing businesses GLA, housing associations (for affordable / social rent)	n/a	- Careful engagement with owners and occupiers on eastern edge of site where no development is proposed - they will need to be equal stakeholders in development process - potential for council-led development to catalyse change, but site is far removed from main road and doesn't have a strong street presence - so although the site can be developed easily, it will be restricted by surrounding structures

\* Based on Ownership data provided by LB Brent, please refer to Chapter 3.14

\*\*Please refer to Chapter 3.15 for parameters guiding building type, sector, floorspace etc.

## Appendix A - Delivery Summary

BSSA3

Development site	Phase (yrs) 3 / 5 / 10 / 15	Housing delivery	Employment floorspace	Additional conditions	Viability status	Agent of Change considerations	Ownership and land assembly*	Business decant and relocation**	Delivery route	Project partners	Community involvement	Risks / Considerations
Town Centre (vacant units)		n/a	1,200 m2 new affordable workspace 6,230 m2 retained retail, food and beverage 840 m2 new community space	Meanwhile activation of vacant unites accompanied by public realm improvements to Church Road and town centre frontages	n/a	Introduction of new community uses may create noise and other potential conflicts with existing upper floor uses. Access and servicing for both new and existing uses may be in conflict with public realm improvements and wider aspirations for removal of general traffic from town centre.	Unknown no. of freeholds and leaseholds  Multiple and fragmented ownerships	Unknown no. of businesses (post pandemic)  No business relocations proposed	Council-led approach for meanwhile activations and public realm improvements to catalyse further regeneration	Community organisations, existing businesses, workspace operators, GLA, TfL, skills and training providers, London Borough of Culture	Potential for all meanwhile activations to be designed, delivered and managed by the community with support from council. Public realm improvements will require engagement and a temporary changes may allow testing of proposals.	n/a
Town Centre (housing delivery)		91 (including replacement of existing)	2,257 m2 - 3,410m2 high street uses (including retail, food and beverage, community, faith and workspace)	n/a	Not viable	Introduction of new residential uses along existing high street uses may be impacted by existing issues of noise, traffic, servicing and anti-social behaviour	Unknown no. of freeholds and leaseholds  Option 1: Multiple and fragmented ownerships incentivised to intensify site-by-site, supported by a Design Code  Option 2: Council acquisition of land in order to deliver housing targets	Unknown no. of businesses (post Covid)  Temporary re-location of existing businesses or works that allow for phasing that allows ground floor units to move once along Church Road	Site-by-site redevelopment of individual ownerships OR council-led development in partnership with housing association	Existing residents, existing businesses, community organisations, housing associations (Catalyst)	New housing and supporting design codes could be developed with the community, supporting residents to design and deliver extensions at a low cost. Potential for skills and training	- retaining cluster of businesses through redevelopment where high street will be a construction site. Both options provide a challenging situation: Opt 1 may mean that piecemeal construction impacts the public realm and street continuously for the long term (if development is sufficiently incentivised). Opt 2. would entire clear one side of the high street, impacting multiple businesses and risking a permanent loss

\* Based on Ownership data provided by LB Brent, please refer to Chapter 3.14

\*\*Please refer to Chapter 3.15 for parameters guiding building type, sector, floorspace etc.



## Appendix A - Delivery Summary

BSSA4

Development site	Phase (yrs) 3 / 5 / 10 / 15	Housing delivery	Employment floorspace	Additional conditions	Viability status	Agent of Change considerations	Ownership and land assembly*	Business decant and relocation**	Delivery route	Project partners	Community involvement	Risks / Considerations
Willesden Workshop*	●	245	1,871 m2 supermarket 1,868 m2 light industrial 1,583 m2 gym 57 m2 retail	n/a	Viable	The site introduces a large number of residential units along Sapcote Estate, which is an actively used industrial estate with yard activity. It is often noise in the day and proposed Willesden Workshop development may anticipate redevelopment of adjacent industrial sites, which is not proposed by the masterplan.	1x Freehold  Multiple ownerships assembled under developer R55	Approx. 4 existing businesses x Unknown specification, with access to a large service yard and along strategic road network  Re-location of existing businesses required, preferably within CEGA or NSGA, along strategic road network and with sufficient yard space.	Developer-led	Affordable workspace providers, housing associations, skills and training providers	Potential for collaborative design for workspace and community-facing uses	- Replacement of industrial uses with creative workspace may set a precedent for replacement of 'low value' uses in the area
Chapman's Estate	●	38	1,419 m2 new industrial 2,968 m2 retained industrial	Service yard and access needed, with continued access and operations for remaining sites within estate		New residential uses potentially impacted by existing industrial uses, including noise, servicing and potential nuisance-generating activity	1x Freehold and 4x Leaseholds  Open to partial redevelopment, however industrial frontage should be maintain on High Road	Approx. 4 existing businesses x Mixed wholesale retail in medium scale low-spec warehouses with dedicated service yards and car parking for customers  Relocation of 1 existing occupier in medium-scale industrial unit	Potential partnership between landowner, council and/or housing association	Existing businesses, housing associations	n/a	- Risk of impact on servicing and access of adjacent units

\* information based on existing planning application 18/3498

\* Based on Ownership data provided by LB Brent, please refer to Chapter 3.14

\*\*Please refer to Chapter 3.15 for parameters guiding building type, sector, floorspace etc.

## Appendix A - Delivery Summary

BSSA5

Development site	Phase (yrs) 3 / 5 / 10 / 15	Housing delivery	Employment floorspace	Additional conditions	Viability status	Agent of Change considerations	Ownership and land assembly*	Business decant and relocation**	Delivery route	Project partners	Community involvement	Risks / Considerations
The Crown		20	480 m2 community space	Meanwhile activation of The Crown building with community and public house uses, followed by residential development with community/public house use on ground floor	Viable	Re-introduction of pub use next to relatively new residential developments (after pub has been disused for many years) may provide a challenge. Need to consider noise, servicing, odours and other nuisance-generating activities or anti-social behaviour	1x Freehold	Vacant	Potential for council-acquisition and initiation of meanwhile use. Potential for partnership with developer or housing association for delivery of residential in med-long term	Community organisations, housing associations, GLA	Potential for all meanwhile activations to be designed, delivered and managed by the community with support from council. Community ownership/ management models could provide continuity beyond meanwhile use.	n/a
Willesden Bus Depot		39	5,943 m2 bus depot 588 m2 offices	Retention of use and operations of bus depot function. Potential to relocate office block to edge of site, to clear more space for vehicles and provide opportunity for introducing residential on upper floors		New residential uses potentially impacted by existing bus depot uses - including noise, odours, night-time servicing and traffic	1x Freehold landowners open to partial redevelopment	No relocation of businesses proposed	Potential partnership between landowner, council and/or housing association	Metroline, TfL, GLA, housing associations	n/a	- future of bus depot on current site is unknown and could present a development opportunity in the future - any localise redevelopment of part of the site should make sure that it doesn't constrain future redevelopment of wider site

\* Based on Ownership data provided by LB Brent, please refer to Chapter 3.14

\*\*Please refer to Chapter 3.15 for parameters guiding building type, sector, floorspace etc.

BSSA8

Development site	Phase (yrs) 3 / 5 / 10 / 15	Housing delivery	Employment floorspace	Additional conditions	Viability status	Agent of Change considerations	Ownership and land assembly*	Business decant and relocation**	Delivery route	Project partners	Community involvement	Risks / Considerations
McGovern's Yard		45	1,265 m2 light industrial 338 m2 workspace 250 m2 retail	n/a	Viable	Site is tightly constrained between terraced housing, which the re-provision of alternative industrial uses could impact	Unknown ownership	Approx. 3 existing businesses x Unknown specification, with access to a large service yard and along strategic road network  Relocation of existing industrial businesses or provision of temporary facilities prior to rehousing on site	Potential partnership between landowner, council and/or housing association	Existing businesses, community organisations, housing associations, GLA	n/a	n/a

\* Based on Ownership data provided by LB Brent, please refer to Chapter 3.14

\*\*Please refer to Chapter 3.15 for parameters guiding building type, sector, floorspace etc.

## **Appendices**

Church End Growth Area Masterplan and SPD

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## EQUALITY ANALYSIS (EA)

<b>POLICY/PROPOSAL:</b>	Church End Growth Area (CEGA) Masterplan and Supplementary Planning Document (SPD)
<b>DEPARTMENT:</b>	Regeneration & Environment
<b>TEAM:</b>	Regeneration
<b>LEAD OFFICER:</b>	Bruna Varante, Principal Regeneration Officer
<b>DATE:</b>	15/06/2022

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

### SECTION A – INITIAL SCREENING

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

Brent adopted Local Plan (2019-2041) identifies Church End as a Growth Area. It requires a Masterplan to facilitate and unlock its regeneration due to its many complex challenges. The Church End Growth Area (CEGA) Masterplan is proposed to:

- Establish the long-term vision and objectives for CEGA;
- Bring forward physical, social and economic regeneration for the benefit of local residents, businesses and communities;
- Identify and secure community and cultural facilities, green open spaces, employment and commercial uses, transport and other infrastructure to support good growth;
- Provide a clear framework for coherent and comprehensive redevelopment of an area where land ownership is highly fragmented;
- Ensure that the negative consequences of piecemeal development are avoided; and
- Provide a basis for planning decisions and serve as a material consideration throughout the planning process.

Intensification of industrial sites and co-location with residential uses is proposed to deliver:

- Fit for the future industrial space for local businesses and emerging sectors including film, music, media and food production;
- Opportunities for employment, skills and training for local people;
- A minimum of 1,300 new high quality homes, including affordable homes, family sized-dwellings, and specialist accommodation for older people;
- A revitalised town centre and outdoor market with a diverse offer;
- A range of new community and creative spaces that support interaction and community cohesion;
- New open spaces, incorporating play for a range of ages including young people and teenagers, alongside opportunities for food growing and access to nature;
- A high quality environment that is safe and accessible to everyone;
- Streets that encourage walking and cycling over private vehicle use, and better connect Church End to the surrounding area;
- A place that achieves the highest standards of sustainability and supports a low carbon circular economy.

The Masterplan will be a Supplementary Planning Document (SPD) to Local Plan policy BSGA1. To ensure the SPD remains relevant over the Local Plan period, the Council will be expected to review the document every 5 years.

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

The CEGA Masterplan SPD will affect various groups of people who live and work in Church End, including existing and future residents, community groups, businesses, landowners, developers, ward members and providers of social infrastructure. Further details are set out below:

### **About Church End Residents**

According to the latest census (2011), the Church End community is composed of 66% BAME groups, mainly Somali and African Caribbean communities. The area also has an average income lower than Brent and London averages, with Universal Credit Claims higher than in Brent and in London (Department for Work & Pensions).

The CEGA Masterplan SPD is proposed to facilitate and promote the delivery of new housing including new affordable housing, workspaces, green spaces, as well as community facilities, and to ensure disadvantage groups can access more homes, employment & training and high quality and inclusive public spaces.

### **Young People**

The CEGA Masterplan SPD highlights the importance of supporting local young people's growth and development as well as identifying the potential to capitalise on the creative talent by securing dedicated spaces for creative development.

### **Elderly People**

The CEGA Masterplan SPD identifies the local need for specialist housing dedicated to older people and sets out a number of improvements to ensure accessibility and mobility are enhanced and maximised within the area.

### **Businesses**

Whilst redevelopment takes place, some businesses might need to be relocated to alternative premises. A *Decant and Business Relocation Strategy* identifies the more and less actively used employment sites within the area, and sets out phasing and measures to help to ensure that businesses are protected and supported while redevelopment takes place.

### **Service providers of social infrastructure and their service users**

CEGA Masterplan SPD identifies locations for social infrastructure, including a Secondary School, a potential location for a Health Facility (subject to agreement with the Clinical Commissioning Group (CCG)); and a number of community spaces, pocket parks and areas of play, as well as improvements to the existing provision.

### **Users, developers and registered providers of social/intermediate/affordable housing**

The CEGA Masterplan SPD provides planning and development guidance to facilitate the delivery of at least 1300 new homes across Church End, highlighting the percentage of affordable homes that should be provided within the different site allocations, and which will later be managed by housing associations and others.

### **London Borough of Brent departments**

Including staff from Planning, Housing, Property, Highways, Public Health, Customer & Digital Services (including Revenue and Debt), Environment Services, Regeneration, Growth & Employment.

### **External and Statutory Agencies**

Environment Agency, Greater London Authority, Natural England, Historic England, Thames Water, Transport for London.

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

Yes, there is relevance to the council's public sector equality duty, and due regard to such is paid in drawing up this equality analysis.

The proposed CEGA Masterplan SPD will guide substantial regeneration and growth planned to be delivered in the borough over the next 20 years, and therefore should aim to remove or minimise disadvantages which are connected to characteristics of protected groups. Consistent with the three aims of the general equality duty, the CEGA Masterplan SPD aims to eliminate unlawful discrimination, advance equality of opportunity, and foster good relations between different groups.

#### **Affordable Housing**

The CEGA Masterplan SPD plans to meet some of the affordable housing needs of the borough, including the needs of protected groups, through for example wheelchair accessible and adaptable housing and supported older persons housing provision. It has a minimum target of 35% affordable housing and when viable 50% affordable housing, with a 70:30 social to intermediate split.

#### **Industrial Space & Affordable Workspaces**

The intensification of industrial uses and provision of employment spaces/affordable workspaces is expected to advance equality of opportunity, by giving those with less financial security the opportunity to access employment in the CEGA.

#### **Employment Opportunities**

By securing new modern and fit for purpose employment spaces, we seek to attract higher value jobs to the area for local people, as well as training and apprenticeship opportunities.

#### **Public and Green Spaces**

Public consultation identified a lack of space where the community comes together, and the SPD seeks to secure new community space and ensure public spaces are inclusive and designed to promote social interaction between different groups.

#### **Active Travel**

The CEGA Masterplan SPD also aims to secure enhanced, safe, accessible and connected public realm and green open spaces for all user groups and further provisions for safe walking/cycling routes that will have positive impacts on all groups.

#### **Partnership Development**

To bring about comprehensive redevelopment in the area, partnerships are required between landowners and developers, the Council, and the existing and future communities. These partnerships also have the potential to facilitate collaboration between different communities, and in realising the objectives of the CEGA Masterplan SPD foster good relations and create a sustainable and inclusive neighbourhood.

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

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	X		
Sex	X		
Race	X		X

Disability	X		
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

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

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

## SECTION B – IMPACTS ANALYSIS

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

Brent's adopted Local Plan (2019-2041) identifies the CEGB as one of 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 the future housing and employment needs of the borough, and was extensively consulted upon and subject to its own equality impact assessment.

The CEGB Masterplan SPD is an opportunity for Brent Council to bring about the physical and socio-economic regeneration of not only CEGB, but also build positive relationships with surrounding neighbourhoods such as Neasden, Harlesden and Willesden Green. The CEGB Masterplan SPD conforms to both the adopted Brent Local Plan (2019-2041) and the new London Plan.

### External Stakeholder Engagement – Prior to Statutory Consultation

The CEGB Masterplan SPD has been developed based on robust analysis and extensive stakeholder engagement undertaken during 2021, including:

- Interviews with community groups, local charities, housing associations, faith groups and businesses;
- An online platform reaching out to a greater number of stakeholders, residents, businesses, community groups, etc;
- A short documentary developed by a local youth-led charity;



- Interactive workshops with community groups;
- Interactive workshops with employment and affordable workspace stakeholders;
- Spring outdoor event;
- Activity with a local primary school;
- Targeted discussions with major landowners;
- Autumn exhibition;
- Online survey;
- Meeting with targeted groups.

Overall, almost 1.000 people participated in the process.

### **Internal Stakeholder Engagement**

The development of the Masterplan was also advised by the following Council's teams: Planning; Transport Planning; Partnerships; Property; Capital Programme; Early Years; Employment, Skills and Enterprise; Libraries; Culture; Parks; Highways and Environmental Services.

### **Baseline information**

The following sources have informed the CEGA Masterplan SPD and this equality analysis:

#### Population & Equality

- Adopted Brent Local Plan (2019-2041) and evidence base, London Borough of Brent
- Demographics analysis London Borough of Brent Research & Intelligence Team

#### Housing

- Strategic Housing Market Assessment (SHMA), 2018, ORS
- Adopted Brent Local Plan (2019-2041) and evidence base, London Borough of Brent
- Brent Inclusive Growth Strategy (2019-2040), London Borough of Brent
- CEGA Masterplan Viability Assessment (2021), BNP Paribas

#### Health & Well-Being

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

#### Local Economy

- Brent Employment Land Demand Study, 2015, ORS
- Brent Affordable Workspace Strategy, 2020
- Brent Employment, Skill and Enterprise Strategy 2015-2020

#### Education

- Joint Strategic Needs Assessment (JSNA), 2019/2020, London Borough of Brent
- Brent School Place Planning Strategy (June 2017 refresh), 2019-2024, London Borough of Brent

#### Land use

- Brent Borough Plan (2022)
- Brent Meanwhile Use Strategy (2021)
- Brent Affordable Workspace Strategy (2020)
- Brent Poverty Commission Report (2020)
- Brent Black Community Action Plan (2020)
- Brent Inclusive Growth Strategy (2019-2040)
- Brent Infrastructure Delivery Plan (2019)
- West London Employment Land Evidence (2019)
- Brent Indoor Sports & Leisure Facilities Needs Assessment (2018)
- Brent Strategic Housing Market Assessment (2018)
- GLA Industrial Intensification and Co-location Study (2018)

#### Movement and Connectivity

- Brent Long Term Transport Strategy (2015-2035) (2021 Review)
- TfL Mayor's Transport Strategy (2018)
- TfL Vision Zero Action Plan (2018)

#### Green and Open Spaces

- Brent Health and Wellbeing Strategy (2022-2027)
- Brent Food Growing and Allotment Strategy
- Brent Open Space, Sports and Recreation Study (2019)
- Brent Council Indoor Sports and Leisure Facilities Needs Assessment (2018)
- The London Food Strategy (2018) (GLA) GLA Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
- GLA Urban Greening Factor LPG (draft) (2021)
- Sport England's Design Guidance
- Natural England Biodiversity Metric, Small Sites Metric (SSM) and Environmental Benefits from Nature Tool (EBNT)
- Fields In Trust Guidance for Outdoor Sport and Play (2020)

#### Building Design and Architecture

- Brent Design Guide SPD1 (2018)
- Brent Tall Buildings Strategy (2019)

#### Climate Change and Sustainability

- Brent Climate & Ecological Emergency Strategy (2021-2030)
- West London Strategic Flood Risk Assessment
- West London Waste Plan (2015)
- GLA Air Quality Positive LPG (2022) (draft)
- GLA Air Quality Neutral LPG (2022) (draft)
- GLA Be Seen energy monitoring LPG (2021)
- GLA Circular Economy statements LPG (2021) (draft)
- GLA Circular economy statements LPG (2020)
- GLA Using Green Infrastructure to protect people from Air Pollution (2019)
- GLA London Environment Strategy (2018)
- GLA London Sustainable Drainage Action Plan (2016)
- GLA The Control of Dust and Emissions During Construction and Demolition SPG (2014)
- Transport for London SUDS in London: A Guide (2016)
- Urban Design for London Designing Rain Gardens: A Practical Guide (2018)
- Homes England Building for a Healthy Life (2020)
- CIRIA The SUDS Manual (2015)

#### **Statutory Consultation**

The CEGA Masterplan SPD will be subject to statutory public consultation for 6 weeks in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement. This will provide developers and local businesses, residents and communities with the opportunity to provide input into the Masterplan SPD, with the council considering and responding to all representations received.

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

<b>AGE</b>	
<b>Details of impacts identified</b>	<ul style="list-style-type: none"> <li>• <b>Affordable Housing/Workspace:</b> Meeting some of the borough's affordable housing and local employment needs is considered likely to have positive impacts on all community groups and ages, especially those with socio-economic disadvantaged background as Church End is known for overcrowding issues.</li> <li>• <b>Employment Opportunities:</b> By securing new modern and fit for purpose employment spaces, we seek to attract higher value jobs to the area for local people, as well as training and apprenticeship opportunities.</li> <li>• <b>Specialist Housing:</b> Older people's accommodation is sought across the CEGA to meet local needs for such identified in the Strategic Housing Market Assessment (SHMA).</li> <li>• <b>Tenure:</b> The SHMA also identifies the need for family-sized dwellings to support the current known issues of overcrowding in Church End.</li> <li>• <b>Health, mobility and wellbeing:</b> Brent is the 4th most inactive borough in London, and nearly 1 in 5 adults in Brent are obese, with this trend set to increase. Provision for enhanced public realm and 'Healthy Streets', publically accessed green open spaces and an improved movement and green spaces network will have a positive impact on all groups and ages.</li> </ul>
<b>DISABILITY</b>	
<b>Details of impacts identified</b>	<ul style="list-style-type: none"> <li>• <b>Accessible Housing:</b> Provisions for accessible housing which are DDA friendly and blue badge parking will be beneficial for Disability groups. 10% of homes are also proposed to be accessible.</li> <li>• <b>Infrastructure:</b> Disabled people might also expect to benefit from investment within the movement infrastructure as a number of crossings, junctions and public/green spaces have been identified for improvement and for development.</li> </ul>
<b>RACE</b>	
<b>Details of impacts identified</b>	<ul style="list-style-type: none"> <li>• <b>BAME Communities:</b> Given Church End's demographics, with BAME communities (66%), mainly Somali and African Caribbean, regeneration and investment into the area is likely to benefit ethnically diverse residents, community groups and businesses.</li> <li>• <b>Business Relocation:</b> In the short term, there is a potential for the CEGA Masterplan SPD to disproportionately affect Somali and African Caribbean residents, as businesses within the industrial sites are relocated during redevelopment. To mitigate that, the Council undertook pre-statutory consultation with the business community and developed a Decant and Business Relocation Strategy to minimise impacts. In the longer term the Masterplan SPD proposes improved spaces for businesses and more opportunities for commerce and enterprise. After businesses and residents feedback regarding the Church End outdoor market, original plans to relocate to Neasden Lane during the car park (BSSA3) redevelopment have been amended to allow a more localised relocation on Church Road. We will continue to monitor and engage with businesses and residents to migrate potential negative impacts.</li> <li>• <b>Safety:</b> Increased surveillance and high quality public realm is likely to provide increased safety, an issue which particularly impacts BAME communities.</li> </ul>
<b>SEX</b>	
<b>Details of impacts identified</b>	<ul style="list-style-type: none"> <li>• <b>Safety:</b> Increased surveillance and high quality public realm is likely to provide increased safety, an issue which particularly impacts women.</li> </ul>

SEXUAL ORIENTATION	
Details of impacts identified	<ul style="list-style-type: none"> <li>No identified impacts upon groups with the protected characteristics of Sexual Orientation is identified in this equality analysis.</li> </ul>
PREGANCY AND MATERNITY	
Details of impacts identified	<ul style="list-style-type: none"> <li><b>Community Spaces:</b> Increased community spaces will offer more opportunities for accessing services and support.</li> <li><b>Public/Green Spaces:</b> Connected network of safe and accessible public, green and play spaces will also provide more opportunities and support for women in pregnancy and/or with children.</li> </ul>
RELIGION OR BELIEF	
Details of impacts identified	<ul style="list-style-type: none"> <li>No identified impacts upon groups with the protected characteristics of Religion or Belief is identified in this equality analysis.</li> </ul>
GENDER REASSIGNMENT	
Details of impacts identified	<ul style="list-style-type: none"> <li>No identified impacts upon groups with the protected characteristics of Gender Reassignment is identified in this equality analysis.</li> </ul>
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	<ul style="list-style-type: none"> <li>No identified impacts upon groups with the protected characteristics of Marriage &amp; Civil Partnership is identified in this equality analysis.</li> </ul>

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

No.

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

The CEGA Masterplan SPD has been developed over 2021 through ongoing consultation with a wide range of key stakeholders, with representatives of those who will be affected by the proposal, including BAME, young people and people with disabilities. Public participation was, at times, limited by the coronavirus pandemic, however, the Council mitigated these circumstances by making use of a hybrid approach for engagement which included online and physical participation events, over a 10 month period, almost 1,000 participated of the process. The Council is committed to re-engaging the local community throughout the statutory public consultation process by summer 2022. This equality analysis will be updated following further consultation.





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

N/A

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

N/A

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

To ensure the CEGA Masterplan SPD remains relevant over the Local Plan period, the Council will consider review of the document after 5 years. Notwithstanding this potential for review, the guidance must be sufficiently flexible and capable of responding to changes in market demands and commercial and economic circumstances. These are factors that can change in a short space of time.

The CEGA Masterplan SPD also provides information on measures that can be taken for future-proofing design in a changing climate and the vital transitioning to net-zero carbon. New development must embody the principles of sustainability and adapt to future changes, and this is particularly relevant as the CEGA is planned to be delivered over a period of approximately 15-20 years.

## SECTION C - CONCLUSIONS

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

The strategic objectives of the CEGA Masterplan SPD are to deliver new homes, jobs and infrastructure and in so doing support good growth, deliver high quality placemaking, and ensure social, economic and physical regeneration brings forward transformational changes, contributing to a vibrant and inclusive neighbourhood.

The CEGA Masterplan SPD will facilitate these objectives and help realise their ambitions for the benefit of the borough's residents, businesses and diverse communities.

The CEGA Masterplan SPD will have positive impacts on existing and new communities alike, including different groups, as it identifies a range of placemaking, environment and sustainability principles which should apply to and guide comprehensive redevelopment of the area, as well as specific positive impacts for people of different age groups and people with disabilities.

Some businesses might need to be relocated to alternative premises whilst redevelopment takes place. The Masterplan proposed a phased redevelopment approach aligned with a *Decant and Business Relocation Strategy* to support and protect businesses, including more intensively used sites for on-going industrial use.

## SECTION D – RESULT

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

### SECTION E - ACTION PLAN


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

Action	Expected outcome	Officer	Completion Date
Statutory public consultation for a minimum of 6 weeks	Review of all comments received through consultation process	BV	Summer 2022
Modification made following consultation and Equality Analysis updated	Integrate all comments and feedback	BV	Autumn 2022
Adoption of the CEGA Masterplan SPD	The Affordable Workspace SPD will now apply, any development proposals must take into account and adhere to the principles set out and guidance provided.	BV	Winter 2022/2023
Review periodically (every 5 years)	Monitor and review equalities impacts	BV	n/a

### SECTION F – SIGN OFF

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Bruna Varante, Principal Regeneration Officer
<b>REVIEWING OFFICER:</b>	Jessica Harrison, Senior Policy and Equalities Officer
<b>HEAD OF SERVICE:</b>	Jonathan Kay, Head of Regeneration - TBC

	<b>Cabinet</b> 12 September 2022
	<b>Report from the Chief Executive</b>
<b>Membership of the i4B Holdings Ltd and First Wave Housing Ltd Boards</b>	

<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Non-Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>No. of Appendices:</b>	N/A
<b>Background Papers:</b>	N/A
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Sadie East Operational Director of Transformation <a href="mailto:Sadie.East@brent.gov.uk">Sadie.East@brent.gov.uk</a> Tel: 020 8937 1507

## 1.0 Purpose of the Report

- 1.1 This report recommends proposed changes in appointments to the board of the Council's two wholly owned housing companies, i4B Holdings Ltd and First Wave Housing Ltd.

## 2.0 Recommendations

- 2.1 Cabinet agrees that Martin Smith and Akintoye Durowaju's terms as Chair and Director for i4B and FWH be extended for a further three years.
- 2.2 Cabinet agrees the appointment of Phil Porter as a Director of i4B and FWH for a period of three years.
- 2.3 Cabinet notes that Gail Tolley will stand down as a Director of i4B and FWH as of 1 September 2022.

## 3.0 Background

- 3.1 The Council has two wholly owned housing companies: i4B Holdings Ltd (i4B), an investment company set up to own and manage private rented sector

properties, and First Wave Housing Ltd (FWH), a registered provider of social housing.

3.2 Brent Council is the sole Shareholder for i4B, and the sole Guarantor for FWH. The Board has the same membership for both i4B and FWH, and is made up of a Chair and four directors, including two senior Council officers, an independent Chair and Directors, and one Councillor. Any removal or appointment of Board members for the companies is a Cabinet decision as Shareholder/Guarantor of the companies.

3.3 The current Board membership is:

- Martin Smith – Independent Chair (appointed 21 December 2016)
- Peter Gadsdon – Corporate Director, Resident Services, Brent Council (appointed 16 December 2016)
- Gail Tolley – Strategic Director, Children and Young People, Brent Council (appointed 12 February 2018)
- Akintoye Durowoju – Independent non-executive director (appointed 1 May 2018)
- Councillor Saqib Butt (appointed 23 November 2020)

#### **4.0 Detail**

4.1 As a result of Gail Tolley's retirement from the Council, she is also standing down as a Director of i4B and FWH, resulting in a vacancy. It is recommended that Phil Porter, the Council's Corporate Director of Adult Social Care and Health, is appointed as a director of both companies for a period of three years.

4.2 It is recommended that Martin Smith's term as Chair of the boards of both companies be extended for a further three years. It is also recommended that Akin Durowoju's term also be extended for a further three years. The total terms of both external board members would be within the recommended maximum term of nine years recommended for the boards of housing providers by the National Housing Federation.

#### **5.0 Financial Implications**

5.1 There are no financial implications from this report.

#### **6.0 Legal Implications**

6.1 As sole Shareholder for i4B and the sole Guarantor for FWH, the Council has an important role in providing strategic direction for the companies and retains control of key decisions. Cabinet is the strategic supervisory body with ultimate responsibility for ensuring governance of the companies and the power to appoint and dismiss Directors and the Company Secretary are reserved to Cabinet. Cabinet therefore has the power to agree the Recommendations contained in this report.

#### **7.0 Equality Implications**



7.1 N/A

**8.0 Consultation with Ward Members and Stakeholders**

8.1 N/A

**9.0 Human Resources/Property Implications (if appropriate)**

9.1 N/A

**Report sign off:**

**Carolyn Downs**  
Chief Executive

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