Public Document Pack

Cabinet

Monday 6 February 2023 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

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**

recycle for Brent

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

Item Page

1 Apologies for Absence

2 Declarations of Interest

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

3 Minutes of the Previous Meeting 1 - 12

To approve the minutes of the previous meeting held on Monday 16 January 2023 as a correct record.

4 Matters Arising (if any)

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

5 Petitions (if any)

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

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

To consider any reports referred by the Community & Wellbeing and Resources & Public Realm Scrutiny Committees.

Finance & Resources reports

7 Budget & Council Tax 2023-24 13 - 296

This report sets out the Council's budget proposals for 2023/24. It also sets out the results of the consultation, scrutiny and equalities processes. Subject to approval by Cabinet, these will form the basis of the budget to be agreed at the Full Council meeting on 23 February 2023.

The report also sets out the overall financial position facing the Council for the medium term and highlights the significant risks, issues and uncertainties.

Ward Affected: All Wards

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

Contact Officer: Ravinder Jassar, Deputy Director of Finance
Tel: 0208 937 1487
ravinder.jassar@brent.gov.uk

8 Acquisition of 294 Homes at Fulton Road, Wembley 297 - 308

This report seeks permission to purchase the long leasehold interests of 999 years (less 3 days) in 294 homes (flats) located on the former Euro Car Parts site, Fulton Road, Wembley, HA9 0TF.

Ward Affected:
Wembley Park

Lead Member: Deputy Leader and Cabinet Member for Finance, Resources and Reform (Councillor Mili Patel)
Contact Officer: Tanveer Ghani, Director - Property and Assets
Tel: 020 8937 1722
tanveer.ghani@brent.gov.uk

9 Airco Close Lease Assignment 309 - 320

This report sets out a recommendation to approve the transfer of a 999-year lease from the developer of 399 Edgware Road to the Council as part of a s106 agreement for the development.

Ward Affected:
Kingsbury

Lead Member: Deputy Leader and Cabinet Member for Finance, Resources and Reform (Councillor Mili Patel)
Contact Officer: Neil Martin - Head of Capital Programmes (Schools)
020 8937 4203
neil.martin@brent.gov.uk

Communities & Regeneration reports

10 Borough Plan 2023-27 321 - 390

This report details the findings from the draft Borough Plan consultation and engagement and sets out the changes and updates proposed in terms of adoption of the final Borough Plan to be recommended to Full Council.

Ward Affected:
All Wards

Lead Member: Leader (Councillor Muhammed Butt)
Contact Officer: Lorna Hughes, Director - Communities
020 8937 5068
lorna.hughes@brent.gov.uk

11 Draft Sustainable Environment and Development Supplementary Planning Document 391 - 588

The purpose of this report to seek approval to undertake consultation on the Sustainable Environment and Development draft Supplementary Planning Document (SPD) and delegate authority to the Strategic Director for Communities and Regeneration 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 final Sustainable Environment and Development SPD.

Ward Affected: All - excluding parts of Alperton, Harlesden and Kensal Green, Stonebridge and Tokyngton where Old Oak and Park Royal Development Corporation is the Local Planning Authority

Lead Member: Cabinet Member for Regeneration & Planning (Councillor Shama Tatler)
Contact Officer: Paul Lewin, Planning, Policy and Projects
Tel: 020 8937 6710
paul.lewin@brent.gov.uk

12 Draft Residential Amenity Space & Place Quality Supplementary Planning Document 589 - 692

The purpose of the report is to seek Cabinet approval for consultation on a draft Residential Amenity Space and Place Quality Supplementary Planning Document (SPD) and to delegate authority to the Corporate Director for Communities and Regeneration 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 Residential Amenity Space and Place Quality SPD.

Ward Affected: All - excluding parts of Alperton, Harlesden and Kensal Green, Stonebridge and Tokyngton where Old Oak and Park Royal Development Corporation is the Local

Lead Member: Cabinet Member for Regeneration & Planning (Councillor Shama Tatler)
Contact Officer: Natasha Reid
Placemaking Officer
020 8937 1448
Natasha.reid@brent.gov.uk

Planning Authority

13 Authority to Award a Contract for Services relating to the Supply, Installation, Operation and Maintenance of Electric Vehicle Charging Points 693 - 720

This report outlines the procurement undertaken for the supply of a Vehicle Charging Infrastructure Solution – Supplier Funded - End to End Service and seeks authority to award the contract.

Ward Affected: All Wards

Lead Member: Cabinet Member for Environment, Infrastructure & Climate Action (Councillor Krupa Sheth)
Contact Officer: Annekatrin Dennemann, Principal Transport Planner
Tel: 020 8937 3553
Annekatrin.Dennemann@brent.gov.uk

Resident Services reports

14 Improving the Customer Experience in Brent Civic Centre 721 - 746

This report seeks Cabinet approval for plans to redesign the face-to-face public spaces in Brent Civic Centre in order to allow the Council to deliver an improved service for residents and customers.

Ward Affected: All Wards

Lead Member: Cabinet Member for Jobs, Economy & Citizen Experience (Councillor Eleanor Southwood)
Contact Officer: Thomas Cattermole, Director of Customer Access
Tel: 020 8937 5446
thomas.cattermole@brent.gov.uk

15 Council Tax Support Fund 2023/24 747 - 756

The report outlines recent changes introduced in relation to Council Tax liability and support for those in receipt of Council Tax Support (CTS) and in relation to households in need and seeks approval to an amendment to the Council's existing 13A(1)(c) policy in order to introduce the new discretionary relief policy.

Ward Affected: All Wards

Lead Member: Cabinet Member for Jobs, Economy & Citizen Experience (Councillor Eleanor Southwood)
Contact Officer: Peter Cosgrove, Head of Revenues and Debt
Tel: 020 8937 2307
Peter.Cosgrove@brent.gov.uk

16 New Repayment Framework for Major Works billing for Leaseholders in Brent 757 - 784

This report provides Cabinet with an overview of recent changes in legislation relating to leasehold management and how these impact on leaseholders in Brent. The report also outlines both a new and improved existing offer for leaseholders when they receive service charges/major works bills from the Council designed to increase repayment options and flexibility taking account of the current economic landscape.

Ward Affected:
All Wards

Lead Member: Cabinet Member for Housing, Homelessness & Renters Security (Councillor Promise Knight)
Contact Officer: Kate Daine, Head of Housing and Neighbourhoods
020 8937 5440
Kate.Daine@brent.gov.uk

17 Authority to award contract for the provision and management of bike hangars in Brent 785 - 796

This report concerns the award of a contract for the purchase and management of future bike hangars and the transfer of the management and maintenance of current bike hangars.

Ward Affected:
All Wards

Lead Member: Cabinet Member for Environment, Infrastructure & Climate Action (Councillor Krupa Sheth)
Contact Officer: Debbie Huckle
Team Leader, Safety and Travel Planning
020 8937 5570
Deborah.Huckle@brent.gov.uk

Children and Young People reports

18 Determination of Brent Council's School Admission Arrangements for Community Primary Schools 2024-25 797 - 832

This report details the outcome of consultation on proposed amendments to the Admission Arrangements for Brent Community Primary Schools for 2024/25 agreed by Cabinet in November 2022. The report seeks Cabinet's agreement to the proposed admission arrangements and schemes of co-ordination for Brent community schools for the 2024/25 academic year in accordance with statutory requirements, which Admission Authorities are required to determine by 28 February in the determination year.

Ward Affected:
All Wards

Lead Member: Cabinet Member for Children, Young People and Schools (Councillor Gwen Grahl)

Contact Officer: Shirley Parks, Director, Safeguarding, Partnerships and Strategy
020 8937 4529
shirley.parks@brent.gov.uk

19 Exclusion of Press and Public

The following items are not for publication as they relate to the category of exempt information set out below, as specified under Part 1, Schedule 12A of the Local Government Act 1972:

Agenda Item 9: Airco Close Lease Assignment – Appendix 2 (Lease Transfer Documents).

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

Agenda Item 13: Authority to Award a Contract for Services relating to the Supply, Installation, Operation and Maintenance of Electric Vehicle Charging Points – Appendix 1 (Name of Tenderers)

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

20 Any other urgent business

Notice of items to be raised under this heading must be given in writing to the Head of Executive and Member Services or her representative before the meeting in accordance with Standing Order 60.

Date of the next meeting: Monday 13 March 2023

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**

LONDON BOROUGH OF BRENT

MINUTES OF THE CABINET
Held in the Conference Hall, Brent Civic Centre on Monday 16 January 2023 at 10.00 am

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

1. **Apologies for Absence**

An apology for absence was received from Councillor Donnelly-Jackson.

Cabinet noted that Rob Mansfield (Head of Communications) was attending to represent Lorna Hughes (Director of communities) on behalf of Communities & Regeneration.

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 12 December 2022 be approved as an accurate record of the meeting.

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

None.

5. **Petitions (if any)**

5.1 Pedestrian Safety at the Junction Between Sidmouth Road, Milverton Road and Alverstone Road

Councillor Muhammed Butt (Leader of the Council) welcomed Dr Deborah Eppel to the meeting, who he advised had been invited to speak on behalf of local residents living in the area surrounding Sidmouth Road, highlighting concerns relating to the safety of pedestrians at the junction between Sidmouth Road, Milverton Road and Alverstone Road due to the volume and speed of traffic, poor visibility and lack of a suitable pedestrian crossing. Members were advised that the request to speak and actions being sought in response were supported by a petition which contained 232 signatories.

In addressing Cabinet, Dr Deborah Eppel highlighted the following key issues:

- Whilst aware there had only been one reported minor collision accident at the junction in the past 3 years, in which a cyclist had been injured, Dr Eppel questioned the number of unreported incidents and near-misses.
- Concerns had been reported to the Council's Traffic Engineers who, whilst recognising the issues raised had advised that funding was not currently available to install a pedestrian island given the Transport for London (TfL) priority criteria for schemes based on collision and injury data. Dr Eppel was concerned this meant the safety of pedestrians would remain in jeopardy, with local resident's keen to ensure action was taken prior to any more serious injury or accident occurring at the junction.
- Whilst the Council's Transportation Team had advised, in response to the petition, that it would be possible to consider the installation of a pedestrian island at the junction this was unlikely to be until 2025/26 and would be based on the availability of TfL funding and the necessary priority being met. Any earlier consideration would only be based on additional funding becoming available.

To improve pedestrian safety, Dr Eppel therefore advised Cabinet that the petition was requesting consideration be given to the provision of the necessary additional funding and review of priorities for 2023/24 to provide for the installation of a pedestrian island on Sidmouth Road, near the junction with Milverton Road and Alverstone Road taking account of the safety concerns identified and proximity of the junction to local schools, nurseries, and other community buildings.

In responding, Councillor Krupa Sheth, as Cabinet member for Environment, Infrastructure and Climate Action, acknowledged the concerns of residents. In highlighting the Council's commitment to improving road safety, as set out within the Council's Long Term Transport Strategy, she outlined the approach taken which it was pointed out had needed to be focussed on the priority of locations with the most significant accident problems along with the availability of funding to design and install speed reduction and pedestrian safety measures. Whilst keen to address the concerns identified, Councillor Krupa Sheth felt it important to recognise that the level of TfL funding available to deal with these types of requests was unfortunately insufficient to meet current levels of demand, hence the need to prioritise potential locations for funding. Whilst an assessment of the latest available personal injury data for the location had recorded only one slight accident she had, however, asked officers (in response to the petition) to undertake a further review of the site based on an assessment of other factors including existing road condition, vehicle speeds, access to local schools and community centres in the area and also to determine whether there was a need to maintain or enhance existing speed reduction measures in the locality. In concluding her response, Councillor Krupa Sheth advised that should the results of this assessment determine the need for a pedestrian facility this would, subject to prioritisation and funding availability, be included in a future programme for officers to progress and consult upon and on which the petitioners would be provided with a further update once the assessment had been completed.

5.2 The Condition of The Avenue, NW6

Councillor Muhammed Butt then moved on to welcome Mr Ben Cook, who he advised had been invited to speak on behalf of local residents living on or near The Avenue, who were requesting pavement and highway improvements due to what

they considered to be the poor and dangerous state of repair of the footway and highway along The Avenue. Members were advised that the request to speak and actions being sought in response were supported by a petition which contained 217 signatories.

In presenting the petition, Ben Cook highlighted the following key issues:

- Residents had been requesting pavement improvements for a number of years with the state of the pavement highlighted as being particularly poor between Brondesbury Park and Tiverton Road, which it was felt disproportionately impacted on the elderly, disabled and children.
- Due to the poor condition of the highway, cyclists were being adversely affected and cars damaged.
- The deteriorated and poorly placed speed bumps along the road were now largely ineffective as speed reduction and traffic calming measures.

Given the volume of traffic using The Avenue the petitioners were requesting immediate action to repair and resurface the footway and highway along The Avenue, with the repair and maintenance of Hanover Road given as an example of the type of action required.

The comments and concerns raised in both petitions were supported by Councillor Gbajumo who also spoke in support to the action being sought by the petitioners and Councillor Hack (as local ward councillors).

In responding, Councillor Krupa Sheth, as Cabinet member for Environment, Infrastructure and Climate Action, again recognised the concerns raised but highlighted the level of demand identified across the borough in terms of road and footway maintenance to improve their condition and visual appearance. Given the level of demand, the ongoing imbalance between maintenance and resource availability once again meant that repairs had needed to be prioritised with an outline provided of the process followed in relation to assessment of both the planned and reactive highways maintenance programmes.

With regard to The Avenue, Councillor Krupa Sheth advised that prior to new surveys being carried out and the asset management criteria scores updated as part of the development of the 2023/24 maintenance programmes, 60% of the pavement along The Avenue had been assessed to fall within the “poor” banding whilst over 80% of the road had been rated in the “excellent” banding. Whilst aware that this did not mean the road was defect free it had meant the road, based on the asset management criteria, had not been considered a high enough priority for planned maintenance during 2022/23 given the current level of demand and level of funding available.

In response to the petition, however, Councillor Krupa Sheth advised that a site visit had been arranged on 19 January 2023, in order to review what other interim actions it may be possible to take, with the concerns regarding the speed humps also referred to the Healthy Streets and Parking Team for review. Subject to the necessary survey data being updated and any mitigating actions identified the requests would then need to be considered again as part of the 2023/24 programme.

In concluding, Councillor Muhammed Butt (as Leader of the Council) praised the hard work of both Dr Deborah Eppel and Mr Ben Cook, stating that it was good to see residents taking the initiative in representing and caring for their local communities. Whilst recognising the position in relation to the limited availability of resources and criteria subsequently needing to be met in assessing requests for the measures being sought within each petition, he welcomed the action outlined by the Cabinet Member for Environment, Infrastructure & Climate Change in order to assess the concerns raised and also extended his appreciation to Councillors Gbajumo and Hack in their support as ward councillors.

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. **Authority to Award Contract for Street Cleansing, Waste Collections and Winter Maintenance Services**

Councillor Krupa Sheth (Cabinet Member for Environment. Infrastructure & Climate Action) introduced a report which detailed the outcome of the procurement process and sought approval to award the Integrated Street Cleansing, Waste Collections and Winter Maintenance Services Contract (Integrated Contract).

In considering the report, Cabinet noted that the recommissioning of the Integrated Contract had formed part of the wider Redefining Local Services (RLS) programme. On the basis of the overarching delivery model agreed as part of the programme it had been agreed to retain the street cleansing, waste collections and winter maintenance services as an integrated service on the grounds of economies of scale, operational efficiency and value for money with the Education, Outreach and Communication (ECO) team to be insourced under a TUPE transfer from Veolia. Members were advised this approach had been designed to provide the Council with direct responsibility for communication, education and outreach to assist in addressing the Council's waste, climate emergency and circular economy objectives and challenges.

In recognising the challenging financial context and uncertainty in which the procurement had been undertaken and ongoing pressure on waste collection and disposal costs, members noted the impact in terms of service delivery options which had emerged and needed to be considered during the procurement process. Cabinet was advised that the resultant changes in relation to street cleansing and recycling collections had therefore been designed to enable the council to continue delivering an efficient, and affordable service that remained fit for the future and better able to meet the Council's environment and the climate objectives.

In outlining the benefits to be delivered through the Integrated Contract, Cabinet noted that these would include (as set out in section 7 of the report) a forecast increase and improvement in the quality and rate of recycling and income received; the provision of nine new electric vehicles; introduction of a free bookable small items collection service; and an intelligent-led approach to street cleansing with proactive, targeted management of hotspots through six new rapid response teams along with the retention of a majority share of future service efficiencies.

As part of the procurement process, Cabinet was also advised of the extensive community engagement and public consultation process undertaken and outcomes identified, as detailed in section 5 and 6 of the report. In noting the feedback provided as a result of the public consultation and the alternate weekly twin stream recycling trial, Cabinet were advised that further modelling would be commissioned in the new year to determine whether any alternate weekly twin stream recycling collection rounds might be better served using an additional wheelie bin for the storing of paper/card rather than a sack. In addition to this, Cabinet was informed of the following modifications to the service due to be introduced in response to feedback from the alternative weekly twin stream recycling trial and the equalities assessment:

- The use of a fully sealable sack lid on all sides to keep the paper and card dry.
- The use of a more durable sack (to be explored with the contractor).
- The provision of an additional sack to be given to residents requesting one.
- Inclusion of a white square on the sack for residents to mark their house number.
- Steps to be taken at the Waste Transfer Station to allow paper/card to dry out to maximise its value.

To ensure a successful transition to the new service, Councillor Krupa Sheth also highlighted the plans for development of a comprehensive information campaign and recycling engagement plan in January 2023, with a particular focus on tackling contamination, so that this was available to coincide with introduction of the new contract and the new recycling service.

In concluding, Councillor Krupa Sheth also welcomed the recommendations from the Resources and Public Realm Scrutiny Committee who had been provided with an opportunity to review the proposed contract and service changes at an additional scrutiny meeting specifically held for the purpose on 13 December 2022. The recommendations made as a result by the Scrutiny Committee had been detailed within section 12 of the report, with members noting the confirmation that these would be progressed by officers early 2023.

Having noted the challenging financial context in which the service delivery options and procurement had needed to be developed, Cabinet expressed their support for the outcome and benefits identified in relation to the Integrated Contract, with insourcing of the ECO team particularly welcomed and thanked Councillor Krupa Sheth and the officers involved for their efforts in terms of its delivery which it was noted provided the opportunity to extend and further develop the relationship with a long-standing partner in terms of the Council's needs.

Having considered the report, including the exempt information included within appendices 1 & 3, Cabinet **RESOLVED**:

(1) To note the results of the public consultation on future waste collections and street cleansing services held in summer 2022 and the results of the alternate weekly twin stream recycling trial held in autumn 2022.

(2) To agree the introduction of an intelligence-led approach to street cleansing from 1 July 2023 and an alternate weekly twin stream recycling collection

service for street level households from 1 October 2023, together with other specification changes as set out in section 7 of the report.

(3) To note that modelling would be undertaken in the new year to determine whether any alternate weekly twin stream recycling collection rounds might be better served using an additional wheelie bin for the storing of paper/card rather than a sack; and that such changes to specific rounds could be introduced subject to a proven business case once the new service goes live, as the collection arrangement provided flexibility.

(4) To approve the award of the Integrated Contract to Veolia Environmental Services UK Ltd for an initial contract period of eight years, with an option to extend for a further eight-year contract period in the estimated sum of £17.13m for 2023/24, circa £137m over the initial 8-year term of the contract or circa £274m over the full 16-year contract period.

(5) To approve the allocation of capital through prudential borrowing of a sum of £21m, comprising £10.8m to finance the purchase of the fleet (including Public Realm Contract rollover assets) required for Year 1 of the contract and a further in principle allocation of £10.2m for vehicle replacements over the remaining term of the contract; and notes that the costs of deployment and maintaining the fleet are included in the contract price.

(6) To approve the allocation of capital through prudential borrowing of up to £1.52m for the purchase and roll out of wheelie bins on alternate weekly twin stream collection rounds where a business case can be made (in line with (3) above).

(7) To agree that the Council enters into a Pension Admission Agreement and a Risk Share Agreement or such other Pensions arrangement as appropriate, in respect of any ex-Brent Council staff who TUPE transferred to the current contractor in respect of the Public Realm Contract who may be entitled to retain access to the Local Government Pension Scheme under the Integrated Contract.

(8) To delegate the resolution of any outstanding Pension issues referred to at (7) above in respect to the Integrated Contract to the Corporate Director, Resident Services in consultation with the Cabinet Member for Environment, Infrastructure and Climate Action.

8. **Authority to Award for Grounds Maintenance Services Contract**

Councillor Krupa Sheth (Cabinet Member for Environment. Infrastructure & Climate Action) introduced a report which detailed the outcome of the procurement process and sought approval to award a contract for the provision of Grounds Maintenance Services.

In considering the report Cabinet noted the outcome of the detailed procurement process which had been undertaken in line with the strategic approach, aims and objectives within the Redefining Local Services (RLS) programme with the new contract and approach providing a standalone grounds maintenance contract designed to deliver a high quality, improved service and enhanced green spaces

facilitated by a dedicated and specialist contractor. Members noted that the scope of the Grounds maintenance contract would include a neighbourhood approach and cover Brent's parks and open spaces, housing estates, highways grass verges and allotments (but not cemeteries), whilst under the insourcing requirement the Parks Warden service would be bought in-house.

Having outlined the procurement process undertaken, Cabinet also noted that the final award of contract would be subject to a formal consultation process with Brent Housing Management leaseholders in relation to provision of the service on housing estates.

In welcoming the new contractor and supporting the approach towards delivery of a standalone grounds maintenance service, Cabinet were also keen to recognise and thank the outgoing service provider for their support and work undertaken to date along with the officers for their efforts in developing the service and undertaking a successful procurement.

In recognising the improvements which it was felt the new contract would deliver in terms of maintaining the borough's public realm and green spaces, and noting the exempt information included within Appendix 1 of the report, Cabinet **RESOLVED**:

(1) To note the contents of the report in relation to the award of a contract for Grounds Maintenance Services.

(2) To approve the award of a contract for the provision of Grounds Maintenance Services to Continental Landscapes Ltd for an initial contract period of eight years, with an option to extend for a further eight year contract period and notes that the value of the contract is estimated to be circa £2.2m per year, or circa £17.6m over the initial 8 year term of the contract or circa £35.2m over the full 16 year contract period excluding VAT, CPI indexation and AWE increases).

(3) To note that the award of the contract would be subject to consideration of any section 20 leaseholder consultation observations received from leaseholders.

(4) To delegate the decision to proceed with the award of the contract, as set out in (2) above, to the Corporate Director, Resident Services in consultation with the Cabinet member for Environment, Infrastructure & Climate Action.

9. Green Neighbourhoods Action Plans

Councillor Krupa Sheth (Cabinet Member for Environment. Infrastructure & Climate Action) introduced a report that updated Cabinet on the development of the Green Neighbourhoods pilot project which formed a key tenet of the council's Climate and Ecological Emergency 2022-24 Delivery Plan. The report also provided Cabinet with an opportunity to review the area-specific action plans which had been developed to support the project and approach outlined following community engagement.

In considering the update and approach outlined, Cabinet recognised and noted the progressive and pioneering approach being taken towards tackling the climate and ecological emergency through the delivery of Green Neighbourhood pilots (the first

phase being Church End & Roundwood; and Kingsbury). Members were advised that the aim was to focus the Council's resources in the pilot areas identified in order to test how they could become as environmentally sustainable as possible and to inform how the whole borough could be net zero and more biodiverse by 2030 based around as positive and transformative an approach as possible in order to deliver changes that would engage and benefit local communities and residents and encourage more sustainable behaviours.

In terms of community engagement and consultation, Members noted that having completed the first phase of engagement a number of themes had been identified including a focus on enhanced green infrastructure and biodiversity; sustainable travel infrastructure; recycling and reuse and the need to address wider environmental concerns such as anti-social behaviour and fly tipping, which had subsequently led to a number of distinct overall 'visions' emerging for the approach in the pilot areas. Moving forward, it was proposed that the next phase of community engagement would commence in the two pilot areas from February 2023 with the objective to start co-producing those projects that would be co-delivered with the community, and to consult with the community on council-led infrastructure projects to ensure local stakeholders were supportive of scheme design and encouraged to participate.

In commending the progress to date, Cabinet welcomed the initial pilot areas and action plans identified, which it was felt would complement wider infrastructure development and improvement in those areas. Members also expressed support for the community engagement process, highlighting particular enthusiasm within schools seeking to act as a catalyst for change in their local communities and were keen to recognise the links also established in relation to Public Health and the opportunities to tackle health inequalities within the action plans for each pilot area, including the focus on in encouraging more active forms of travel.

Having noted and commended the extent of community engagement in development of the Green Neighbourhood areas and action plans, Cabinet **RESOLVED**:

(1) To agree the Green Neighbourhood Action Plans for Church End & Roundwood (Appendix A) and Kingsbury (Appendix B), summarised in section 5 of the report.

(2) To note the results of community engagement activity undertaken from July to October 2022, outlined in section 4 of the report and detailed in Appendix C of the report.

(3) To agree the proposals for future engagement with communities in the Green Neighbourhood areas, summarised in section 6 of the report.

10. **Authority to Award Contracts for Highway Maintenance**

Councillor Krupa Sheth (Cabinet member for Environment. Infrastructure & Climate Action) introduced a report that sought approval to award contracts for the provision of Highway Maintenance Services (collectively referred to as "the contracts").

In considering the report, Cabinet noted the outcome of the detailed procurement process which had been undertaken in line with the strategic approach, aims and objectives within the Redefining Local Services (RLS) programme and the approach and associated service improvements focussed around the procurement of two contractors for delivery of the Highways Maintenance works element of the contract split across two areas of the borough. In terms of the scope of work for each element it was noted that the award of Lot 1 would cover planned schemes and maintenance work in area 1 of the borough along with reactive repairs across the whole borough and occasional planned schemes and maintenance work in area 2. Lot 2 would cover planned schemes and maintenance work in area 2 of the borough along with occasional reactive repair across the borough and occasional planned schemes and maintenance work in area 1 of the borough.

In noting the rationale behind the procurement approach undertaken, members were supportive of the impact generated through the increased competition in terms of not only the enhanced flexibility but also in relation to the provision of a more resilient and reactive service. It was, however, noted that the cost in relation to the emergency reactive repair service under the contract would be subject to an increase which, given the current pressure on the reactive maintenance budget, would require careful management in terms of mitigating the impact on funding available for medium priority highway defects.

In welcoming the enhanced flexibility and improvements to the responsive and reactive nature of the service alongside the associated social value commitments to be delivered under the contracts, Cabinet also took the opportunity to thank the outgoing service provider for their efforts and officers for their work in procurement of the contracts.

Having noted the competitive nature of the procurement undertaken and additional resilience the new arrangements had been designed to deliver Cabinet **RESOLVED,** having also taken account of the exempt information included in Appendix 1 of the report:

(1) To approve the award of the contract “Lot 1” for the provision of Highway Maintenance Services to O’Hara Bros Surfacing Ltd for an initial contract period of seven years, with an option to extend for up to a further three years on an annual basis and to note that the value of the contract is estimated to be circa £4.3m per year, or circa £43m over the 10 year duration of the contract (excluding inflation indexation).

(2) To approve the award of the contract “Lot 2” for the provision of Highway Maintenance Services to GW Highways Ltd for an initial contract period of Seven years, with an option to extend for up to a further three years on an annual basis and to note that the value of the contract is estimated to be circa £3.5m per year, or circa £35m over the 10 year duration of the contract (excluding inflation indexation).

11. **Quarter 3 Financial Report 2022/23**

Councillor Mili Patel (as Deputy Leader and Cabinet Member for Finance, Resources & Reform) introduced a report, which detailed the current forecast of

income and expenditure versus the revenue budget for 2022/23 and other key financial data.

In considering the report, Cabinet noted the current pressures being forecast for the year, with a forecast overspend of £3.2m being made up of £1.6m pressures within the Dedicated Schools Grant (DSG) and £2.3m of pressures within the General Fund focussed around Children and Young People in relation to the Localities, Looked After Children & Permanency and Placement budgets, although it was noted these had been partially offset by a £0.7m underspend within the Central Items budget. Members were advised of the management actions being undertaken in order to mitigate the pressures identified in these areas, which it was noted reflected national trends and challenges in the recruitment and retention of social work staff as well as the increased demand and costs for residential placements. The report also detailed the progress in delivery of the £2.7m savings target for 2022-23 (as detailed within Appendix A of the report).

Members also noted the ongoing risks and uncertainties outlined in relation to inflationary pressures and the impact of the cost-of-living crisis both in terms of the current financial year and Council's overall Medium Term Financial Strategy, given the increased demand on services and also rising costs. Alongside this, members were also advised of the ongoing risks identified in relation to the Council's Capital Programme, which currently included a forecast slippage of £35.6m and underspend of £0.2m largely attributable to South Kilburn, Public Realm and Regeneration and with the underspends being largely offset by overspends in both the General Fund and HRA Housing programmes. These pressures reflected rising inflation combined with the increased cost of borrowing and a shortage of labour and materials, which it was noted had adversely impacted on the financial viability of schemes especially within the New Council Homes Programme (NCHP) and had resulted in the Council therefore having to explore a range of options to sustain viability including pausing, reducing or reviewing the existing the scope or tenure mix of schemes to ensure funding could continue to be prioritised appropriately.

In noting that the provisional Local Government Finance Statement had only been announced on 19 December 2022, members were advised that further details regarding its impact would be reported to Cabinet on 6 February 2023 as part of the Budget and Council Tax Setting report. Commenting on the challenges identified as a result, members noted the specific impact this had created in terms of Adult Social Care and the programme of planning in relation to winter care.

Having recognised the ongoing challenges and financial pressures being faced across the Council and work being undertaken to manage the Council's overall budget position in relation to the ongoing economic uncertainty it was **RESOLVED:**

(1) To note the overall financial position and the actions being taken to manage the issues arising as detailed within the report.

(2) To note the savings delivery tracker in Appendix A and detailed in section 3.7 of the report.

(3) To approve the virements detailed in section 3.7 of the report.

12. **Treasury Management Mid-Year Review 2022-23**

Councillor Mili Patel (Deputy Leader & Cabinet Member for Finance, Resources and Reform) introduced a report updating Members on Treasury Management activity for the first half of the financial year 2022-23.

In considering the report Members noted the economic context under which the Council's Treasury Management Strategy had been operating including the ongoing impact of the war in Ukraine current rate of inflation and higher interest rates along with the ongoing uncertainty and volatility in relation to financial markets, which it was recognised had been exacerbated by the fiscal plans introduced by the Government towards the end of September.

In noting the update provided in relation to the Council's debt management position, as detailed within section 3.18 – 3.32 of the report, Members were advised that new external borrowing had been minimised to meet cash flow requirements, which included borrowing to support the viability and affordability of the Capital Programme during current market volatility. The estimated borrowing requirement for the remainder of the financial year 2022/23 was noted as being in excess of £50m, which took account of the Council's ongoing capital financing requirement, usable reserves, planned capital expenditure and minimum revenue provision, Members were advised that the Council's main objective when borrowing remained to ensure an appropriate balance between securing low interest costs and achieving cost certainty. In terms of long-term borrowing options the Public Works Loan Board (PWLB) remained the main source, however, other low cost forward funding options also continued to be explored as opportunities arose. Members' attention was also drawn to the movement in standard rates at which local authorities could borrow from the Public Works Loan Board (PWLB) along with the change in lending arrangements, designed to ensure that assets were not being invested primarily for yield. Whilst this restriction would not apply to investment in regeneration activities where "debt for yield" was not the primary purpose Members were assured that the Council was not planning to purchase any investment assets primarily for yield meaning it was able to continue accessing PWLB borrowing facilities.

Members also noted the update provided in relation to the Council's Treasury Investment Activity, as detailed in sections 3.33 – 3.41 of the report with most of the Council's funds continuing to be held in Money Market Funds.

Members welcomed the report and prudent approach being delivered in terms of the Council's Treasury Management activity to support delivery of the Council's wider ambitions and priorities given the challenging economic context under which the Treasury Management Strategy was having to be delivered. Having noted the assurance provided that the Council had fully complied with the Treasury Management Indicators for 2022/23, as detailed within Appendix 1 of the report Cabinet **RESOLVED** to note the 2022-23 Mid-Year Treasury report and approve it being forwarded on to Council, in compliance with CIPFA's Code of Practice on Treasury Management (the Code).

13. **Exclusion of Press and Public**

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

14. **Any other urgent business**

There were no items of urgent business.

The meeting ended at 10:47am

COUNCILLOR MUHAMMED BUTT
Chair

Brent	**Cabinet** 6th February 2023
	Report from the Corporate Director of Finance and Resources

Budget and Council Tax 2023/24

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	21 – See list attached
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Minesh Patel Corporate Director of Finance and Resources Email: Minesh.Patel@brent.gov.uk Tel: 020 8937 6528 Rav Jassar Deputy Director of Finance Email: Ravinder.Jassar@brent.gov.uk Tel: 020 8937 1487

1.0 Purpose of the Report

1.1 The purpose of this report is to set out the Council's budget proposals for 2023/24. It also sets out the results of the consultation, scrutiny and equalities processes. Subject to discussion at the Cabinet meeting these will form the basis of the budget to be agreed at the Full Council meeting of 23 February 2023. The report also sets out the overall financial position facing the Council for the medium term and highlights the significant risks, issues and uncertainties.

1.2 Reports on the budget position have been brought to Cabinet throughout the year, most recently in July and November 2022. There is a high level of uncertainty due to high levels of inflation, economic turmoil resulting from war

in Ukraine, the Government's short-term funding settlements, delays in funding reforms, the effects of the cost of living crisis on residents and businesses in the borough and the impact of Brexit. Due to these issues, it was estimated in November 2022 that £28m of savings would be required in 2023/24 and 2024/25, profiled £18m in 2023/24 and £10m in 2024/25.

1.3 Brent has delivered total cumulative savings of £196m since 2010, and it is clear that over the remainder of the Spending Review period into 2023/24 and 2024/25 further savings will be required. The lack of clarity about the future of local government financing makes it hard to be precise about future financial targets, but the estimated savings requirement was calculated to ensure that the Council can set a balanced budget in 2023/24 and 2024/25.

1.4 However, the provisional local government finance settlement unexpectedly increased core spending power for Brent by 11.2%, including an increase to the 'referendum limit' for Council Tax to 4.99% (where 2% is ring fenced for Adult Social Care). Like last year, the Government's financing assumption is that all Councils would act on this. The decision on Council Tax will be taken by Full Council, but the budget has been constructed on the basis of a 4.99% rise in the Brent element of Council Tax, which is consistent with the previous position of increasing Council Tax by the maximum amount allowable under the legislation. In addition, this is based on taking into account the rising inflationary pressures that the Council is subject to, the financial position in the round and the results of consultation through Brent Connects and other meetings held by the date of despatch of this report. Further details regarding decisions on Council Tax, including support for residents that are financially vulnerable, are set out in section five of this report.

1.5 The Mayor of London has announced plans for an increase in his precept of 9.7% (slightly different rules on the limits for the Greater London Authority (GLA) apply due to its role as the police authority) making the overall increase in Council Tax 6.0%. This equates to £1,924.45 at Band D, or the equivalent of £37.01 per week, and the overall increase equates to £2.10 per week.

1.6 The additional resources provided in the provisional local government finance settlement have resulted in a reduction in the savings requirement for 2023/24 and 2024/25 to £21.0m, profiled £13.5m in 2023/24 and £7.5m in 2024/25. This enables the deferral of £4.5m of the savings previously identified for 2023/24 to be deferred to 2024/25. Based on current estimates, this leaves a budget gap of £3m in 2024/25. However, this settlement also deferred many of the spending cuts that the Chancellor of the Exchequer had set out as necessary in his Autumn Statement to return the nation's finances to a sustainable position over the medium term. Therefore, it remains likely that further savings will be required from 2025/26 onwards and this will be kept under review and reported to Cabinet throughout 2023/24. Further details on the changes to the budget development process since the draft budget are set out in sections four and five of this report.

1.7 Given the significant financial uncertainties that have been highlighted throughout this process, this is a balanced and proportionate approach to the

demanding choices that have to be confronted in budget setting. It should be recognised, however, that forecasting over the medium term has been, and continues to be, extremely difficult. There is a high level of uncertainty over the medium term due to the delays in funding reforms, the continuing impacts of COVID-19 and Brexit on residents and businesses in the borough, the war in Ukraine and global inflationary pressures. The significance of the financial challenge cannot be underestimated, however the measures outlined in this report aim to ensure that the Council continues to operate in a financially sustainable and resilient way.

1.8 Agreeing the proposals in this report will enable the Council to set a balanced budget in 2023/24 in accordance with its statutory obligations and consistent with the Borough Plan. The plan focuses on how the Council will take forward delivery in the five priority areas being of fundamental importance to Brent and its people:

- Prosperity, Pride and Belonging
- A Cleaner, Greener Future
- Respect and Renewal in Brent
- The Best Start In Life
- A Healthier Brent

1.9 The Council received over 900 responses to the Consultation on the draft Borough Plan. Broadly, people found that the key issues for the borough were reflected within the draft priorities. As a result, the MTFS will need to ensure it provides a framework to enable and support the delivery of these programmes.

1.10 Aside from the updating of and adjustments to various technical assumptions the key features of this budget are:

- A Council Tax rise of 4.99% for the Brent element, making a Band D Council Tax of £1,490.31. Additionally, the Council will levy a Council Tax precept currently expected to be £434.14 at Band D on behalf of the GLA. Therefore, the total Council Tax at Band D is expected to be £1,924.45, which is an overall increase of 6.0%.

- New budget savings proposals with an aggregate value of £18m, with £4.5m deferred to 2024/25, as set out in Appendix C (i)

1.11 This report is structured as follows:

- Officer recommendations for Cabinet and Full Council to approve;
- Strategic overview of the financial and macro-economic climate;
- Summary of the processes taken to develop the budget;
- Update on the 2022/23 revenue budget and review of the key budget assumptions;
- The results of consultation, scrutiny and equalities are set out;

- Updates from the Council's ring fenced budgets, specifically the Housing Revenue Account (HRA) and the Dedicated Schools Grant (DSG);
- The capital programme is set out, along with the associated capital strategy, investment strategy and treasury management strategy; and

Recommendation(s)

Cabinet

2.1 Agree to recommend to Full Council an overall 4.99% increase in the Council's element of Council Tax for 2023/24, with 2% as a precept for Adult Social Care and a 2.99% general increase.

2.2 Agree to recommend to Full Council the General Fund revenue budget for 2023/24, as summarised in Appendices A and B.

2.3 Agree to recommend to Full Council the savings proposals for 2023/24 and deferral of savings to 2024/25 as set out in Appendix C (i).

2.4 Note the report from the Budget Scrutiny Task Group in Appendix D.

2.5 Agree to recommend to Full Council the HRA budget for 2023/24 and business plan, as set out in section seven and appendix Q of this report.

2.6 Agree the HRA rents for council dwellings, tenant service charges and garages, as set out in section seven of this report.

2.7 Agree the rents set under the Housing General Fund for Brent Housing PFI and traveller's site pitches and to note the rents for Hillside dwellings as set out in section seven of this report.

2.8 Note the Dedicated Schools Grant, as set out in section eight of this report.

2.9 Agree to recommend to Full Council the changes to the existing Capital Programme in relation to additions of new schemes and reprofiling, as set out in section 10 of this report and Appendix E, and note the Capital Pipeline Schemes in Appendix F.

2.10 Agree to recommend to Full Council the Capital Strategy, the Investment Strategy, the Treasury Management Strategy and the Minimum Revenue Provision Statement as set out in Appendices G, H, I and J.

2.11 Agree to recommend to Full Council the Reserves Strategy and schedule of reserves, as set out in Appendix K.

2.12 Agree the action plan to implement CIPFA's Financial Management Code and conduct a Financial Resilience Assessment, as set out in Appendix L.

2.13 Agree, and where relevant agree to recommend to Full Council, the schedule of fees and charges for 2023/24, as set out in Appendix M.

2.14 Note the results of the budget consultation, as set out in section six and detailed in Appendix N.

2.15 Note the advice of the Corporate Director of Governance, as set out in Appendix O.

2.16 Note the decision of the Corporate Director of Finance and Resources to continue as part of the Eight Authority Business Rates pool in 2023/24 as set out in Section five of this report.

Full Council

2.17 Agree an overall 4.99% increase in the Council's element of Council Tax for 2023/24, with 2% as a precept for Adult Social Care and a 2.99% general increase.

2.18 Agree the General Fund revenue budget for 2023/24, as summarised in Appendices A and B.

2.19 Agree the savings proposals for 2023/24 and deferral of savings to 2024/25, as set out in Appendix C (i).

2.20 Note the report from the Budget Scrutiny Task Group in Appendix D.

2.21 Agree the HRA budget and business plan in the overall Council budget for 2023/24 as set out in section seven and appendix Q of this report.

2.22 Agree the Dedicated Schools Grant, as set out in section eight of this report.

2.23 Agree the changes to the existing Capital Programme in relation to additions of new schemes and reprofiling, as set out in section 10 of this report and Appendix E, and note the Capital Pipeline Schemes in Appendix F.

2.24 Agree the Capital Strategy, the Investment Strategy, the Treasury Management Strategy and the Minimum Revenue Provision Statement as set out in Appendices G, H, I and J.

2.25 Agree the Reserves Strategy and schedule of reserves, as set out in Appendix K.

2.26 Note the action plan to implement CIPFA's Financial Management Code and conduct a Financial Resilience Assessment, as set out in Appendix L.

2.27 Agree the schedule of fees and charges, as set out in Appendix M.

2.28 Note the results of the budget consultation, as set out in section six and detailed in Appendix N.

2.29 Note the advice of the Corporate Director of Governance, as set out in Appendix O.

2.30 Agree the Pay Policy Statement for 2023/24, as set out in Appendix P.

Council Tax recommendations

The GLA will agree its final budget and Council Tax precept at a meeting on the same day as the Full Council meeting of 23 February 2023. The statutory calculation of the total amount of Council Tax under Section 30(2) of the Local Government Finance Act 1992 cannot be carried out until the final GLA precept has been received.

2.31 In relation to the Council Tax for 2023/24 we resolve:

That the following amounts be now calculated as the Council's element by the Council for the year 2023/24 in accordance with Sections 31 to 36 of the Local Government Finance Act 1992 as amended:

(a) £1,061,792,345 being the aggregate of the amount that the Council estimates for the items set out in Section 31A(2) of the Act.

(b) £910,992,347 being the aggregate of the amounts that the Council estimates for the items set out in Section 31A(3) of the Act.

(c) £150,799,998 being the amount by which the aggregate at (a) above exceeds the aggregate at (b) above, calculated by the Council, in accordance with Section 31A(4) of the Act, as its Council Tax requirement for the year.

(d) £1,490.31 being the amount at (c) above, divided by the amount for the tax base of 101,187, agreed by the General Purposes Committee on the 12 December 2022, calculated by the Council, in accordance with Section 31B of the Act, as the basic amount of its Council Tax for the year.

(e) Valuation Bands

A	B	C	D	E	F	G	H
£	£	£	£	£	£	£	£
993.54	1,159.13	1,324.72	1,490.31	1,821.49	2,152.67	2,483.85	2,980.62

being the amounts given by multiplying the amount at (d) above by the number which, in the proportion set out in Section 5(1) of the Act, is applicable to dwellings listed in a particular valuation band divided by the number which in that proportion is applicable to dwellings listed in valuation band D, calculated by the Council, in accordance with Section 36(1) of the Act, as the amounts to

be taken into account for the year in respect of categories of dwellings listed in different valuation bands.

2.32 That it be noted that for the year 2023/24 the proposed GLA precept issued to the Council, in accordance with Section 40 of the Local Government Finance Act 1992, in respect of the GLA, for each of the categories of dwellings are as shown below:

Valuation Bands

A	B	C	D	E	F	G	H
£	£	£	£	£	£	£	£
289.43	337.66	385.90	434.14	530.62	627.09	723.57	868.28

2.33 That, if notification of the GLA precept has been received at the time of the Full Council meeting of 23 February 2023, having calculated the aggregate in each case of the amounts at paragraph 2.31(e) and 2.32, the Council, in accordance with Section 30(2) of the Local Government Finance Act 1992, hereby sets the following amounts as the amounts of council tax for the year 2023/24 for each of the categories of dwellings shown below:

Valuation Bands

A	B	C	D	E	F	G	H
£	£	£	£	£	£	£	£
1,282.97	1,496.79	1,710.62	1,924.45	2,352.11	2,779.76	3,207.42	3,848.90

2.34 That, if notification of the GLA precept has not been received at the time of the Full Council meeting of 23 February 2023, the Council will refer to the Council Tax setting committee, the setting of the Council Tax for the year 2023/24, in accordance with section 67(3) of the Local Government Finance Act 1992.

2.35 That, if required, the special Council Tax setting committee meet on 24 February 2023 to allow Council Tax notices to be issued in line with the normal statutory timetable.

2.36 That it be noted that the Corporate Director of Finance and Resources has determined that the Council element of the basic amount of Council Tax for 2023/24 is not excessive in accordance with the principles approved under Section 52ZB of the Local Government Finance Act 1992.

(a) That the Corporate Director of Finance and Resources be and is hereby authorised to give due notice of the said Council Tax in the manner provided by Section 38(2) of the 1992 Act.

(b) That the Corporate Director of Finance and Resources be and is hereby authorised when necessary to apply for a summons against any Council Tax payer or non-domestic ratepayer on whom an account for the said tax or rate and any arrears has been duly served and who has failed to pay the amounts due to take all subsequent necessary action to recover them promptly.

(c) That the Corporate Director of Finance and Resources be and is hereby authorised to collect revenues and distribute monies from the Collection Fund and is authorised to borrow or to lend money in accordance with the regulations to the maximum benefit of each fund.

3.0 Strategic Overview

3.1 In July 2022 Cabinet received a report on the Medium Term Financial Outlook. That report highlighted considerable uncertainty in the economy caused by exceptional factors such as the enduring impact of COVID-19, high levels of inflation, particularly for fuel and energy, labour shortages and rising interest rates and the global impact of war in Ukraine. These macro-economic factors together with local changes to demographics and demand-led pressures combine to create substantial need for growth in the Council's budget. At that time, levels of government funding were uncertain with speculation that nationally funding for local government was unlikely to keep pace with inflationary pressures and locally the effect of the government's "Levelling Up" agenda may be to move funding from London to the rest of the country.

3.2 In November 2022, the draft 2023/24 budget was presented, which highlighted that the budget gap between 2023/24 and 2024/25 was estimated at £28m and that due to high level of uncertainty over the economic environment and local government funding the budget setting process was to be restricted to a single year, rather than the two year programme that was previously customary practice. £18m of new savings proposals were presented, which if approved would enable the Council to set a balanced budget for 2023/24.

3.3 These savings are in addition to the £196m removed from the Council's budget since 2010 as a result of significant reductions in government funding and the challenges posed by new legislation, at a time when demand for key services is rising and COVID-19 continues to have an impact on the Council's finances and services.

3.4 Brent continues to experience levels of unemployment and poverty higher than the rest of London – a trend which has been exacerbated by the COVID-19 pandemic. According to Official Labour Market Statistics, the unemployment rate in Brent was 4% in September 2019, lower than the London average of 4.6%. However, by June 2022 this had risen to 8.2% - significantly higher than the London average of 5.3%. 36% of people in Brent live in poverty – the second highest level in London – and 30% of residents are estimated to be earning

below the Living Wage. Brent therefore has a large number of vulnerable people who are already financially challenged and who face further deprivations as a result of the cost of living crisis.

3.5 The cost of living crisis will have a significant impact on the residents of Brent. The Council is committed to doing what it can to assist those in greatest need, in particular providing support via the Resident Support Fund and the local Council Tax Support scheme. Further details are provided at the end of this section of the report.

3.6 Service demand continues to rise due to demographic changes which affect all age groups, with particular pressures on adults' and children's social care and the homelessness budget.

3.7 In part as a result of the war in Ukraine causing a spike in energy prices, inflation is running at high levels not seen since the 1980s. Besides rising energy costs, other goods are also experiencing increases in prices, due to factors such as labour shortages, pay rises, logistics issues and a general trend to restore profit margins where previously slumps in demand had suppressed price levels. In September 2022 CPI stood at 10.1% against a Bank of England target of 2%. RPI, which is often used as the basis for indexation in contracts, was at 12.6%.

3.8 In December 2022, CPI stood at 10.5%, down from a peak of 11.1% in October 2022. The Bank of England expects inflation to fall sharply from the middle of 2023 as the price of energy will not continue to rise as quickly and due to a fall in demand for goods and services. However, it currently remains significantly above the Bank of England's inflation target of 2% and is likely to remain high throughout much of 2023.

3.8 Having remained at 1% or less since February 2009, interest rates began rising in June 2022. Initially this was in response to rising inflation with the Bank of England using rises in borrowing costs as a means to stifle demand in the economy. More recently, the run on the pound and the potential collapse of some private sector pension schemes have prompted significant increases in the costs of government borrowing with gilt yields reaching their highest level since 2008. For the Council, this translates into higher costs of borrowing which in turn is having an adverse impact on the capital programme.

3.9 Over the course of 2022 the country has had three Prime Ministers and four Chancellors of the Exchequer. The political uncertainty and indecision caused by these changes has been exacerbated by policy decisions such as the September mini-budget which found so little favour with the financial markets that it led to a run on the pound, substantial hikes in gilt prices and the intervention of the bank of England to prevent the collapse of the pensions market. As 2022 drew to a close, some much needed calm was restored to the political situation. For local government the Autumn Statement provided much needed additional cash for social care, though not as much as the LGA amongst others had identified as needed. It also deferred the implementation of the cap on care costs, meaning that the timing of the implementation of the proposed care reforms is now unclear.

Local Government Finance Settlement

3.10 On 19 December 2022, Michael Gove issued the provisional 2023/24 Local Government Finance settlement.

3.11 Whilst the 2022 Autumn Statement covered three years, the provisional Local Government Finance Settlement is for one year only, the fifth one-year settlement in a row. Clearly, this is not helpful for medium term financial planning. The Autumn Statement is backloaded, with substantial cuts in public sector funding which are required to balance the books scheduled for 2025/26 (i.e., after the next general election). It is therefore important to realise that whilst the funding for 2023/24 and the indicative figures for 2024/25 are better than anticipated, in the medium term it would appear that very substantial cuts in government funding could be on the horizon. It is therefore prudent to plan for this now and take action that will put the Council in as strong a position as possible to deal with future funding reductions.

3.12 In summary, the provisional settlement confirms the additional care funding announced in the Autumn Statement. This was announced too late for inclusion in the Draft Budget presented to Cabinet on 14 November 2022. Whilst the settlement provided additional funding that was not forecast in the MTFS, additional pressures have emerged since the MTFS was last reported to members. It is also worth noting that some of the additional funding is one-off (New Homes Bonus) and other elements are ringfenced to particular service areas (social Care). Taking these factors into account, the overall picture presented by the MTFS remains largely unchanged, although the additional funding will enable £4.5m of the savings identified for 2023/24 to be deferred into the following year.

3.13 Further details of the technical elements of the settlement and the impact on the 2023/24 budget are set out in section five of this report.

3.14 Overall, the headline announcement is that core spending power for Brent will increase by 11.2% in 2023/24. However, this assumes that the Council will increase Council Tax by the maximum amount allowable of 4.99% without triggering a referendum – a two percent increase in the previous limit (1% Council Tax and 1% Adult Social Care Precept). Some of the funding allocation formulae use measures of deprivation and Brent has the second highest level of deprivation in London. Therefore, Brent received a proportionately higher increase in core spending power. As RPI in September 2022 was 12.6%, it is arguable that an 11.2% increase in core spending power actually represents a real terms cut in funding.

3.15 Nevertheless, while the additional funding announced for Local Government is welcome, the funding available overall is unlikely to be sufficient to withstand the increased demand for services, in particular as demand for children's social care services is still increasing. Uncertainty over the timing of the adult social care reforms adds a further financial risk. Therefore, Brent, like all Local Authorities, will need to make significant savings over the next few years to

deliver balanced budgets. The provisional settlement and Autumn Statement provide figures on additional social care grants for the next two years, but it is unclear what happens after that.

3.16 The government has decided to continue with the Services Grant, first introduced last year. The MTFS assumed that the 2022/23 Services Grant would be redirected away from London as part of the government's Levelling Up agenda and that Brent would therefore receive reduced funding. In fact, this has not happened, but the NIC clawback and the redirection of funding to supporting families grant have taken its place. The Settlement abolishes the Lower Tier Services grant and uses its resources to provide a minimum funding increase guarantee – no London Borough receives any funding from this grant. The reallocation of the Lower Tier Services Grant was not anticipated.

3.17 The Autumn Statement announced the deferment of the implementation of the cap on care charges part of adult social care funding reforms for two years. The Settlement reallocates the funding made available for the preparatory work to provide funding for additional care placements. There is speculation whether this will ever be implemented – the revised date is after the next general election. If implementation does recommence in 2025/26, there is a potential financial risk if these funds have been used to fund additional ongoing placements, when the funds revert to funding the introduction of the care cap. The settlement also includes a new Adult Social Care grant which is ringfenced to funding hospital discharges.

3.18 Whilst the increase in core spending power is greater than expected, some of the increase depends on Brent residents paying 4.99% more Council Tax in the midst of the cost of living crisis and a substantial part of it is targeted at additional social care expenditure. The additional funding available to support existing services is less than inflation and therefore amounts to a real terms cut.

Cost of living crisis

3.19 Since late 2021, the UK has experienced a rise in the cost of living for individuals and businesses. For many Brent residents, this means having to make difficult decisions on how they spend their income, which can have a negative impact on their standard of living.

3.20 The December 2022 attitudes survey by YouGov for the GLA found 50% of Londoners surveyed were going without basic needs, struggling to make ends meet or just about managing with their financial situation, with 32% buying less food and essentials to manage their living costs. Of those surveyed, the groups that were most likely to face these challenges included Black and Asian Londoners, social renters (from housing association or Council), and those whose daily activities were considerably limited by health problems or disabilities. These findings align with the Council's Resident's Attitudes Survey, conducted in 2021 to inform the Borough Plan, which at that time found almost a quarter of residents said their financial situation had got worse.

3.21 The Council has a number of initiatives aimed at supporting residents who may be struggling and enabling Brent and partner organisations to best respond to local needs. These include:

Financial support

- The **Brent Resident Support Fund (RSF)** has been in place since August 2020. In the period August 2020 to January 2023, RSF has supported 6,940 households with a total of £12.2 million. The support provided is for help with the cost of living. This can include, but is not limited to, household bills, arrears in rent, mortgage, Council Tax, food, fuel, digital equipment and emergency funds. Urgent assistance is provided when residents are at risk of losing their home and when an application to the RSF is unsuccessful, the applicant is referred to a credit union for help with an interest-free loan.
- Further support is provided through signposting to other internal (e.g. Brent Hubs) and external (e.g. Citizens Advice) services. The Council and key partners are also trialling a subsidiary of the RSF, a Crisis Response Fund, to provide rapid financial aid for residents facing emergencies. The trial began in December 2022.
- During 2022/23 Brent has also supported 94,000 households with a £150 rebate, funded from government grants, to help with the cost of energy bills.
- **Council Tax Support** (CTS): 27,495 households are supported through CTS of which 18,923 are working age and 8,572 are pension age. Pension age residents are entitled to full Council Tax support depending on their income, savings and household composition. The total support given to households is around £32m per annum.
- A new training programme to upskill front-line staff began in January 2023. The programme aims to enable more effective and earlier interventions by Brent and partner staff and to increase capacity for money and debt support in the borough. A CoL Practitioners Network has also been developed and recently expanded to include external partners to share learning and improve access to existing support.
- In addition, a pilot programme to increase capacity for specialist debt advice is being developed, this will include more capacity to issue debt relief orders where appropriate. The pilot will look at the benefits of providing this advice to RSF applicants who are seeking support to deal with debt to help them to avoid going back into debt in future.

Food and energy support

- **Brent Hubs** work with residents who find it difficult to access the support they need through mainstream services. This includes issuing vouchers to residents in need of urgent food and fuel support, as well as making

referrals to food aid agencies and support schemes for utility costs. Since January 2021, over 8,115 residents have accessed Hub services. Over the same period, the Hubs provided food and fuel vouchers.

- The most common needs which residents present with at the Hubs are food and fuel support (25%), housing costs (18%), homelessness (11%), form filling – such as RSF applications - (16%), debt and money (7%), welfare benefits (7%), and other, for example, employment, general support, immigration etc.(16%).
- The Government's **Household Support Fund (HSF)** has been used to provide support to Brent households with the cost of food and fuel in the form of food and fuel vouchers, grants, and financial support to food aid organisations. The HSF is a follow-on fund from the previous COVID-19 Winter Support Fund and COVID-19 Local Support Funds, which had been in place since December 2020.
- The Council is testing the delivery of a new food aid and support model in partnership with Sufra NW London. The Community Shop and Kitchen will be trialled over a 6-month period at Bridge Park Leisure Centre, commencing in January 2023. The model will give members a host of benefits including weekly food shopping, hot meals, access to themed support workshops and other social and wellbeing activities.

4.0 Budget Development Process 2023/24

4.1 The budget development process for the Council to set its budget and council tax for 2023/24 was as follows:

- Meetings involving Cabinet and Corporate Management Team members to consider the key service and budget issues likely to affect the council in future years;

- Development of budget proposals by officers and relevant Lead Members for individual services within the context of the Borough Plan and the overall resources available;

- Development of the budget approach, based on the updated medium term financial outlook, which was considered by the Cabinet on 14 November 2022;

- The publication of a detailed list of savings proposals at Cabinet in November 2022 for the purposes of consultation, scrutiny and equality analyses;

- Debates through the Budget Scrutiny Task Group of the Resources and Public Realm Scrutiny Committee;

- Presentations and question and answer sessions at virtual Brent Connects meetings;

- Review of the schools budgets by the Schools Forum;

- Considering feedback from residents, businesses and other key stakeholders, whether received from the online consultation portal or other direct representations; and

- Conducting individual equality impact assessments (Appendix C (ii)) on the budget proposals and a cumulative equality impact assessment (Appendix C (iii)) on the overall budget in order to ensure that the consequences of the budget proposals were properly understood.

4.2 This report updates the position on the core estimates that drive the Medium Term Financial Strategy assumptions, including the outcome of the provisional settlement and the consultation, scrutiny and equalities analyses processes.

5.0 Update and Review of Key Budget Assumptions

5.1 The provisional 2023/24 Local Government Finance Settlement (pLGFS) was announced on 19 December 2022 and provided details of the core funding allocations for local authorities in 2023/24. The pLGFS is another one-year settlement, which does not help medium term planning, but there is sufficient information to produce a high-level forecast of government funding in 2024/25. The settlement confirmed the funding announced in the Autumn Statement and the Local government finance policy statement 2023-24 to 2024-25. The key headlines that are relevant for Brent from a budget setting point of view are set out below.

Revenue support grant (RSG) and other relevant grants

5.2 RSG for 2023/24 is £28.97m an increase of 12.2% from the 2022/23 level. Some of this increase results from the government rolling into RSG a number of grants that were previously allocated separately. If these are stripped out, the increase is 10.1%, in line with the September CPI inflation figure.

5.3 On social care funding, as announced in the Autumn Statement 2022, the provisional settlement sets out the proposed amounts and allocation methodologies. For Brent, this includes £13.3m Improved Better Care Fund – fixed at its 2022/23 level and £22.34m Social Care Grant – an increase of £8.6m. The ASC precept has increased from 1% to 2% - this is intended to provide £2.8m of recurring funding for social care.

5.4 The Market Sustainability and Fair Cost of Care Fund (£0.91m in 2022/23) has been replaced by a new Adult Social Care Market Sustainability and improvement Fund. Brent's allocation is £3.14m – a £2.23m increase. This is intended to support Local Authorities prepare their markets for reform and move towards paying providers a fair cost of care. This grant therefore covers new

burdens arising from reform of the care system and is therefore fully committed to fund anticipated additional expenditure.

5.5 The settlement introduces a new Adult Social Care Discharge Grant – Brent's allocation is £1.87m. This is intended to support the discharge of patients from hospital into social care. It is understood that this grant is ringfenced for use on interventions that best enable the discharge of patients from hospital to the most appropriate location for their ongoing care.

5.6 The government has decided to continue to allocate Services Grant, but has deducted from this the additional funding for the increase in employer's National Insurance Contribution for the social care levy, which is not going ahead. An amount has also been removed to provide additional resources for supporting families grant. Brent may receive some additional grant in this area, but it is unclear whether this will be more or less than the amount top sliced from the Services Grant. Brent's allocation is £3.43m - a reduction of £2.7m from the 2022/23 amount.

5.7 New Homes Bonus for 2023/24 is £7.91m – an increase of £4.8m. This is the highest amount in England. The large allocation results from a number of property completions, delayed due to the pandemic, taking place in 2022/23. This is one-off funding. The government has not indicated whether there will be a future allocation; instead, stating that this will be decided in the settlement for 2024/25. This does not have an impact on the revenue budget currently being consulted upon as the grant forms part of the funding for the Council's capital programme.

5.8 At the date of despatch of this report, allocations for the Public Health Grant had not been announced. While no allocations have been published, it is inferred from the Spending Review statement that the grants will rise by inflation. Last year's allocation was £22.9m.

5.9 The Council had been expecting a reduction in Homelessness Prevention Grant as the government undertook a consultation during 2022 on new allocation methodologies. Either of the two options proposed would have reduced Brent's allocation. In fact, the allocation for 2023/24 is £7.3m – an increase of £0.2m on the 2022/23 level. For 2024/25 the government has allocated Brent £7.6m – a further £0.3m increase.

Council Tax

5.10 The settlement confirmed that Local Authorities will be able to increase Council Tax by up to 2.99% without a local referendum. In addition, local authorities will be able to levy a 2% adult social care precept.

5.11 Like last year, the Government's financing assumption is that all councils will act on this and increase Council Tax by the maximum amount possible. It should be noted that the additional income generated through the Adult Social Care precept alone does not cover the total growth requirement for Adult Social Care pressures. However, the increase would permanently increase the council

tax base income and it would also help to reduce the significant funding pressures in 2023/24 and beyond. Taking into account the unprecedented pressures within social care and the financial position in the round, the recommendation of this report is that the budget should be constructed on the basis of a Council Tax increase of 4.99% in 2023/24.

5.12 While it is acknowledged that increasing Council Tax will be difficult for some households, it should also be recognised that the Council continues to invest in the Council Tax Support scheme, which provides over £32m of support for around 28,000 households who are financially vulnerable. This support will be supplemented in 2023/24 from the Government's £100m Council Tax Support Fund, which will enable Brent to reduce bills for Council Tax Support claimants by up to a further £25. In addition, the Council's Resident Support Fund has made available additional funds for residents who are having difficulty due to unforeseen financial circumstances as a result of COVID-19 and the cost of living crisis.

5.13 Since the draft budget was presented to Cabinet in November 2022, a review of collection rates was undertaken as part of the calculation of the Council Tax Base for 2023/24, agreed at General Purposes Committee on 12 December 2022. This review determined that the long term collection rate was still below the Medium Term Financial Strategy target rate of 97.5%, from which the target had been reduced in 2022/23, and that the cost of living crisis is likely to continue to have an impact on collection of Council Tax. The decision was therefore taken to keep the collection rate target at 97.0% for 2023/24. However, this reduction in assumed collection is offset by a higher than expected rate of growth in the tax base driven by ambitious targets for housebuilding in the borough, as set out in the Brent Local Plan. All other budget assumptions for Council Tax remain unchanged to those presented as part of the draft budget.

5.14 Each financial year, the Mayor and London Assembly must prepare and approve a budget for each of the constituent bodies and a consolidated budget for the authority as a whole. At the date of despatch of this report, the Mayor has proposed to increase the GLA precept by 9.7% to £434.14 per Band D property in the 32 London Boroughs. The increase includes a bespoke additional £20 requested by the Mayor of London, and approved by Central Government, to fund TfL services. This would mean that the overall Council Tax would increase by 6.0%.

5.15 These figures are subject to change following the consultation process and confirmation of London Boroughs' tax bases. The final GLA budget will be considered by the London Assembly on 23 February 2023. As the GLA's budget will be considered on the same day as the Council considers its budget and Council Tax, a Council Tax setting committee has been established to finalise the overall Council Tax setting process if the GLA precept is not received in time for the Full Council meeting.

Business Rates

5.16 In the Provisional Local Government Finance Settlement, the Baseline Funding Level was increased by 3.7% to £91.6m.

5.17 Each year the business rates multiplier should increase by CPI, which was 10.1% in September 2022. As in previous years, Central Government decided to freeze the multiplier to protect businesses from the impact of this inflation. In 2023/24 the Government will once again provide an additional grant to compensate for the income lost due to the under-indexation of the multiplier both in 2023/24 and for previous years. This takes the total funding received by Brent under the business rates retention system to £107.2m, a 10.1% increase on 2022/23.

5.18 The Government has allowed Local Authorities with a geographic link to form a business rate pool. The settlement confirmed the Eight Authority Business Rates Pool (involving the City of London Corporation as well as Tower Hamlets, Hackney, Haringey, Waltham Forest, Brent, Barnet and Enfield) is able to proceed in 2023/24 and a Memorandum of Understanding has been signed by all boroughs. In forming a pool, the group of authorities are seen as a single entity from a business rate perspective and in doing this, should retain more of the business rate income generated locally. However, it should be noted that the benefits of the pooling arrangement will not be recognised in 2023/24 as the final calculation can only be made once the statutory NNDR3 returns for all eight authorities have been audited. Final settlement of the pooling benefits will therefore be received in 2024/25 at the earliest.

5.19 From 1 April 2023, liabilities for business rates will be based on the rateable value of the property at 1 April 2021. This revaluation is the first to take place since 2017 and will result in either an increase or decrease to the business rates bills for individual businesses relative to the change in the open market annual rental value of the property between 2015 and 2021. The sector with the largest increase in rateable value overall in Brent is the industrial sector, with smaller increases overall for retail, offices and others. However, within each sector, some rateable values will increase, while others will decrease.

5.20 Bills will also take into account any reliefs that a property is eligible for, e.g. small business rates relief, ensuring that individual businesses are not disproportionately affected by changes to their rateable value.

5.21 Under the business rates retention system, the revaluation will have a nil impact on the funding received by the Council. The Council receives a top up to bring its business rates income in line with the Baseline Funding Level (BFL). If the amount of retained business rates rises as a result of the revaluation, the top up amount will fall to keep the Council at the BLF figure. Other authorities pay a levy, as their retained business rates would otherwise be over their BFL. In their case, the levy will change to maintain funding at the BLF value. Therefore, the revaluation will have an impact on the balance of top-ups and levies within

the Eight Authority Business Rates Pool. For technical reasons, this could result in an increase or decrease to the benefit that is generated from the pooling arrangement.

5.22 Financial modelling on the impact of the revaluation on the pool has been undertaken, which has determined that there is a financial incentive for all boroughs to continue in the pool. In accordance with the authority delegated to the Corporate Director of Finance and Resources, the decision has been taken for Brent to continue in the Eight Authority Business Rates Pool. The financial benefits of the pooling arrangement, once confirmed, will be brought forward in a subsequent budget setting round.

5.23 The City of London will act as lead authority and during 2023/24 a working group will be set up to closely monitor each borough's financial forecasts with respect to collectible amounts, collection rates, growth, revaluations, etc. All other budget assumptions for Business Rates remain unchanged to those presented as part of the draft budget

Brent Pension Fund employer contributions

5.24 The Brent Pension Fund is currently in the process of finalising the triannual valuation and analysis of the Council's contribution rate has been completed. The results of this exercise were presented to the Pension Sub-committee in October 2022 and it was agreed that the Council's contribution rate can be reduced by 1.5% per year over the next three years from 2023/24. This reduction also applies to the Council's schools and most academy schools in the borough. The reason for this is due to a significant improvement in the funding level of the pension fund, arising from better than expected investment returns.

5.25 However, the exact size of the saving is uncertain and will depend on the level of pensionable pay for employees in the pension scheme and the pay award. The pay award for 2022/23 agreed in November 2022 is for a fixed increase which averages 6.5%; the pay award for 2023/24 has yet to be agreed. If the pay award for 2023/24 is around the same level as 2022/23, the additional cost would negate the savings from lower contribution rates. A further reduction in the contribution rate of 1.5% would occur in 2024/25 and again in 2025/26. As the pay award for future years is unknown, it is not possible to estimate if further savings can be achieved from reduced contribution rates. This will be assessed every year as part of the budget setting process and if savings can be realised they will be incorporated into the MTFS to support the overall budget.

Departmental pressures

5.26 The Draft Budget report presented to Cabinet in November 2022 highlighted that managing ongoing demand-led pressures remains a key aspect of the MTFS. The draft budget report set out in detail the existing annual growth assumptions, or estimated increases in unavoidable expenditure, that are built in to the MTFS, for example contract inflation, pay inflation and meeting the cost of providing existing services for a growing population. As the two areas most

affected by the changes in demography and increasing contractual costs, the Adult Social Care and Children's and Young People's departments undertook scenario and sensitivity analysis of the effects of different levels of inflation and demographic change. This determined a central case (that is a position between possible best and worst cases), which has been used as the basis of the contract inflation and demographic changes in these areas. A summary of these growth and cost pressures presented in November are shown in Table 1 below.

Table 1: Growth / Cost Pressures (Draft Budget, November 2022)

GROWTH SUMMARY	**2023/24**
Demographics	
- ASC	3.73
- CYP	1.47
- Other Departments	1.30
Sub-total	6.50
Inflation	
- ASC	7.76
- CYP	3.06
- Contracts	3.83
Sub-total	14.65
Pay	6.50
Other (E.g. Public Health Grant inflation)	0.70
	28.35

5.27 Since the Draft Budget Report presented to Cabinet in November, further work has been done to identify inflationary and service pressures on the 2023/24 budget.

- The rising demand in CYP for placements was reported in the Q2 Financial Report and the position had further deteriorated by Q3. This issue is unlikely to be resolved in the short term by management action and therefore further growth is required.
- London Councils has provided forecasts for concessionary fares (Freedom Pass), which shows a substantial uptick over the next two years. If that is the case, growth in this budget is unavoidable.
- Part of the additional government social care funding is ringfenced to support hospital discharges. The Council therefore needs to incorporate this expenditure into its budget.
- The Residents Support Fund has proven to be a highly effective means to support vulnerable people experiencing financial difficulty. Providing a further £3m tranche of funding in 2023/24 is considered reasonable given the ongoing cost of living crisis.
- In addition, the Council is aware that many families experiencing poverty as a result of the cost of living crisis are unable to access Free School Meals

for their child/children. As a result, a further £1m of funding will be made available under the Council's new 'Family Food Fund' to support families with food poverty.

- Increased costs of borrowing caused by rising interest rates and the rise in gilt rates as a result of the mini-budget mean that additional funding is required to service the capital programme financing requirement.
- Inflationary pressures are expected to be higher than anticipated in the November Budget Report, particularly in children's and adults' social care.
- The 2022/23 pay award was higher than budgeted in part due to the use of a fixed amount pay increase which proved high cost to Brent once London weighting was added to the base amount. The ongoing pay budget needs to be increased to reflect this. Also, it would be advisable to increase the pay award provision in case a further fixed amount pay award is agreed for 2023/24 as this is more costly to Brent than a percentage increase. Additional provision is also needed for the 2024/25 pay award.
- Economic uncertainty is very high and in consequence it is prudent to build up a contingency budget to deal with unexpected cost pressures. The previous contingency was exhausted by the 2022/23 pay award.
- Provision has been built in to allow for the deferral of savings across years of up to £4.5m of the existing £18m package of 2023/24 savings.

5.28 A summary of the overall growth and cost pressures are shown in Table 2 below.

Table 2: Growth / Cost Pressures (Final Budget, February 2023)

GROWTH SUMMARY	2023/24
Demographics	
- ASC	3.73
- CYP	3.97
- Other Departments	1.30
Sub-total	9.00
Inflation	
- ASC	9.71
- CYP	3.86
- Contracts	4.08
Sub-total	17.65
Pay	8.50
Service Changes	13.80
	48.95

5.29 The following sections provide commentary on the service pressures and other challenges faced by each department.

Summary of Service Area pressures:

Adult Social Care and Health

5.30 Within Adult Social Care a key area of uncertainty for 2023/24 was the fair cost of care and social care reforms. The reforms were due to be implemented from October 2023. However, at the Autumn Statement, delivered in November 2022, it was announced that they would be delayed for two years to October 2025. Whilst the reforms have been delayed, the sector must still work to ensure sustainable rates for care are paid with fair cost of care funding from the Government continuing for the next two years.

5.31 Ongoing financial government support and market sustainability are an uncertainty, particularly with the ongoing cost of living crisis and inflationary pressures being faced by the department. These are highly likely to have an impact on spot placement requests from providers who are looking to recover some of the additional costs they are incurring.

5.32 There were previous concerns around Hospital Discharge (D2A) funding ending in 2022/23. However, as was stated in 3.17 the Autumn Statement confirmed that hospital discharge funding will continue. Going forward It will be distributed as a ringfenced part of the Better Care Fund. The government will set out further details on the conditions of this funding in due course, with the funding intended to support improvements to adult social care and in particular to address discharge delays.

5.33 The growth set out in Table 2 is primarily based on taking the central case following a series of scenario analyses and sensitivity analyses on various budget assumptions. Specifically, they arise from demographic pressures which have been calculated by extrapolating trends over recent years and inflation where upward pressures on contract values and spot purchase prices have been used to calculate the future indexation requirement. At this stage of the budget setting process this growth is deemed as reasonable to contain the financial pressures expected in 2023/24.

Children and Young People (CYP) General Fund

5.34 There continues to be increased spend in the General Fund of the CYP department due to the impact of rising demand for placements and high inflationary cost increases, risk of loss of health contributions and the reliance on agency Social Work staff due to recruitment and retention challenges.

5.35 Across the CYP department, there has been an increase in the number of children and young people receiving support. This increased demand for services follows from a 13.1% rise in the cumulative rate of referrals for social care services in October 2022 through the Brent Family Front Door (BFFD) compared to October 2021. As a result, since the end of the last financial year, there has been a 3.2% rise in the number of cases. The number of cases increased from 2,878 in October 2021 to 2,969 in October 2022. Caseloads are exceeding the budgeted level of c2,500 by 18.8%. Alongside the increase in overall caseloads, which is also in line with national trends, there has been an increase in complex cases, evidenced by an increase in children subject of a Child Protection Plan with the number in August 2022 of 413 being the highest in the last 10 years in Brent.

5.36 After a period of relative stability in the Looked After Children (LAC) population at between 280 and 300 children before the COVID-19 pandemic, in 2022/23, the LAC numbers have averaged 337. The Unaccompanied Asylum-Seeking Children (UASC) currently represents 16.9% of the LAC population. Although grant funding is received from the Home Office to mitigate the costs, pressures arise, as the funding is not sufficient to cover costs such as specialist age assessment social workers, legal costs, additional personal advisors to manage cases, and increased subsistence costs. In addition, a larger cohort of UASC are older and when they turn 18 years, the funding reduces significantly from £143 per day to £38.57 per day.

5.37 The average weekly cost of a residential placement is £4,935, which is £535 higher than the 2021/22 average. The impact of inflation is likely to see the weekly costs increase further in 2023/24. In 2022/23, six residential placements with complex needs weekly costs, ranged from £7,300 to £13,000 and the local authority has recently placed a child in a placement at £20,000 per week. These costs reflect the challenging placements market, which is a national issue and is causing significant budgetary pressures. Due to the current economic climate, inflationary pressures are expected to be passed onto the service by providers.

5.38 Health contributions from the Integrated Care Partnership mitigates some of the placement cost pressures and pressures on support for children with disabilities. With the implementation of the North West London Integrated Care System (ICS), a review of health contributions is taking place which for some is resulting in decisions that they no longer meet thresholds. Brent is not isolated in this issue and Directors of Children Services (DCSs) from LAs across the ICS footprint have collectively escalated their concerns to the ICS about the impact on local authorities. Through the Joint Funding Panel, the CYP department will continue to challenge decisions and consideration will be given to appropriate legal redress if a satisfactory outcome cannot be achieved.

5.39 Within the Localities, Looked After Children, and Permanency (LAC&P) services, there are challenges regarding the recruitment and retention of skilled and experienced social work staff with the services relying on agency staff whose costs are more expensive than permanent staff. Across the Localities team, agency staff occupy 44% of the establishment. If demand in cases continues to grow, this could create an added pressure in these areas. The department continues to face pressures from the national challenge for the recruitment and retention of social workers, leading to a reliance on agency staff. A shortage of social workers and other case holding staff, which has further been exacerbated by the impact of the pandemic and rising demand, is an acknowledged national issue, which requires a coordinated regional approach over the medium term. CYP management will continue to take steps to improve the recruitment and retention of social workers.

Communities and Regeneration

Communities

5.40 Brent is mandated to accept Homelessness applications from newly arrived Ukrainian refugees. The Communities service receives a grant from the Department for Levelling Up, Housing & Communities to fund the support provided to the guests and their sponsors. It was announced in December 2022 that the second-year funding, commencing on 1st January 2023, will reduce from £10.5k per new guest to £5.9k. This will result in pressures on the Communities budget as there will be less funding for the service to provide the same level of support and reduce the level of resources distributed to other departments.

5.41 Following COVID-19, residents are now more aware of the support available for them which has led to an increase in demand for critical services delivered by our Voluntary and Community Sector partners, for example Independent Advice and Guidance services. In addition to this, the cost of living crisis is expected to cause further increase to demand.

5.42 Similarly, the impact of COVID-19 has led to additional learning and understanding of how community organisations can be supported to deliver vital services, which has led to an increase in funding applications that are administered by the teams. The service is working on plans for how this demand can be managed within existing resources.

Regeneration

5.43 Within Regeneration there is some uncertainty on the Planning income that can be expected to be collected in future years. Income is currently lower than in past years, which is likely to relate to ongoing inflationary pressures and challenging legislative changes around fire safety, materials and staffing shortages. The market is demonstrating some nervousness in property and land investment decisions and there is less appetite for developments of all sizes. There is the potential that this could impact the income received for years to come.

Resident Services

Demographics

5.44 Environmental Services generate a large proportion of the Council's income through fees and charges. A decrease in the level of income received due to a slow recovery following the pandemic or decreased demand for services due to the cost of living crisis, could put a pressure on the service's budgets.

5.45 For instance, within the Parking service, whilst there is a slight increase in the number of resident permits sold as people work from home, there is a decline in the number of business permits purchased, as well as a reduction in revenue from car parks and on street parking. A reduction in penalty charge notices, and a loss of income as a result, is also likely due to people less likely to take a risk of non-compliance.

5.46 The Heathy Streets and Parking budget is reliant on TfL LIP (Local Implementation Plan) funding, which has been significantly reduced due to severe financial pressures on TfL. TfL have negotiated a funding settlement for 18 months and Brent's allocation has reduced by £1m for 2022/23. The budget pressure for 2023/24 and future years will depend on funding available for the programme. The service is restructuring to align with future resource requirements in early 2023.

5.47 The current volatility in the energy markets mean significant uncertainties in this area. Brent is on a forward purchase contract, whereby a lot of energy for the current year was bought months ago when prices were lower. However, a £2m budgetary pressure is still anticipated in 2022/23, rising to £4.6m in 2023/24. The average delivered energy price change last supply year versus current supply year shows approximately 76% increase for electricity and circa 204% increase for gas. It is hoped that prices will come down in 2023/24, however this is hard to predict. It is also known that public sector organisations are not eligible for support through the Government's proposed Business Energy Bill Relief Scheme. The Council is currently completing significant energy efficiency works, using a Government grant, across Brent's estate, which is expected to alleviate some of the pressures.

Environment contracts

5.48 Growth has been built into the MTFS to help alleviate some of the pressures associated with contract indexation within the Environmental Services department, however this continues to present a significant budget risk. Growth for Housing and Leisure services Private Finance Initiative contracts is also included in the MTFS for 2023/24. Contracts are often linked to indices such as CPI or RPI and services are contractually obliged to reflect any fluctuations in annual contract payments.

Temporary accommodation

5.49 As the cost of living crisis deepens, with energy costs and day to day expenditure increasing, there has been a rise in homelessness applications, resulting in an increased use of temporary accommodation. In addition, the current economic climate could also have an impact on the rent collection rates and result in an increase in rent arrears.

5.50 In addition, the affordable Private Rented Sector has contracted, which means there is a lack of supply to move households on from temporary accommodation, which will put further pressures on the budget. Although, the opening of Anansi and Knowles house has alleviated this pressure to some extent, both schemes are now full and silted up due to the lack of move on accommodation available.

Overall summary of the budget position

5.51 The main general fund revenue budget for 2023/24 is set out in detail in Appendices A and B. The budget includes £48.9m of growth items and £13.5m of savings. Provided that the key assumptions set out in this report hold true then expenditure in 2023/24 should be contained within budget. The overall revenue budget is set out in the table below.

Table 3: Net Revenue Budget

REVENUE BUDGET	2023/24
	£m
Service Area Budgets	
Adult Social Care and Health	137.3
Children and Young People	70.1
Communities and Regeneration	5.3
Finance and Resources	11.8
Resident Services	73.8
Governance	13.7
Total Service Area Budgets	**312.1**
Central Budgets	46.3
Total Budget Requirement	**358.4**
Funding	
Business Rates	(107.2)
Government Grants	(100.4)
Council Tax	(150.8)
Total Funding	**(358.4)**

Adequacy of reserves

5.52 As part of the implementation of CIPFA's Financial Management Code, the Council reviewed its approach to reserves. It produced a Reserves Strategy, set out in Appendix K (i), which defines a formal policy to determining the purposes for which reserves will be held and how the amount of those reserves will be calculated. This is closely aligned to the MTFS.

5.53 Whilst reserves are held for a variety of purposes, they can be grouped under two main headings: reserves held for planned and specific purposes and those held to hedge against the unexpected.

5.54 Planned reserves are an intrinsic part of the Council's medium and long term financial planning processes, as they enable funds to be carried across years to fund planned expenditure and to smooth demand that may be uneven over time. Within this heading also fall reserves required by statute or the accounting code of practice. The Council's financial plans will determine the nature and level of these reserves.

5.55 Contingency reserves provide funds to cover uncertain events that may transpire. This includes holding a working balance to cover bumps in the Council's cash flow. Unlike planned reserves, the level of contingency reserves is subjective and requires professional judgment. Indeed Section 25 of Local Government Act 2003 places a duty on the Director of Finance to report to Council his/her view of the adequacy of the reserves so that the Council can make an informed decision. To do this, consideration needs to be given to the

risks facing the Council, such failure to deliver savings, overspending due to demand pressures, uncertainty over future funding and potential natural disasters. These need to be considered from the perspective of likelihood and impact. Past experience and comparison with similar local authorities, such as other London boroughs, are a means to assess the level at which reserves need to be held. Also, it would not be prudent to set a level of reserves that would guard against all possible eventualities. Some events, like major natural disasters or a second pandemic, are of such calamitous impact that no local authority could be expected to weather them without assistance from central government. Indeed, this is why the government has the Bellwin scheme to support such events and also why substantial support has been provided to alleviate the financial effects of COVID-19 pandemic.

5.56 The Council has taken these factors into account and has decided that as a principle 5% of net expenditure should be held as generally usable reserves. The details of this assessment are explained further in the Reserves Strategy, in Appendix K (i). It is the opinion of the Corporate Director of Finance and Resources, as required by Section 25 of the Local Government Act 2003, that this level of general usable reserves constitutes the amount that is sufficiently robust to maintain the Council's financial sustainability.

5.57 Appendix K (ii) sets out the Council's schedule of earmarked reserves, their purpose and a forecast for the use of the reserve. The Council determines, via this report, the use of these reserves for these purposes in the context of the Council's financial regulations and scheme of transfers and virements. In addition, should an overspend arise, it can be set against the general fund balance or the service pressures reserve, which are defined as the Council's generally usable reserves for these purposes. Again, approval of these arrangements are to determine compliance with the Council's financial regulations and scheme of transfers and virements.

5.58 Some local authorities may propose to balance their 2023/24 budget using reserves, thus reducing the savings requirement. However, in order to ensure that the Council's budget is sustainable in the long term, it is not considered appropriate at this time to use the reserves in this way, as they are required for the reasons set out above and in Appendix K. Therefore, the Council is not proposing to balance the 2023/24 budget using reserves.

Robustness of estimates

5.59 Section 25 of the Local Government Act 2003 requires the Section 151 officer to report to Council on the robustness of the estimates made for the purposes of the calculations included in the budget. The Council has used a variety techniques to ensure that the estimates made in setting the budget are robust. These include revised forecasts of the resources available to the Council, which sets the financial envelope in which the Council has to operate, and identification of areas subject to significant demand and cost pressures. Sensitivity analysis has been used to ascertain the impact of changes to demographics and the level of inflation. A middle case scenario has been used which is the anticipated most likely outcome to determine any growth

requirements in these areas. Departmental bids for growth and corporate provisions for cost pressures such as the pay award have been subject to challenge. The culmination of this work is the identification of the budget gap which will be bridged by savings, which themselves have been subject to challenge by CMT and members. Finally, the impact of the Local Government Finance Settlement has been reviewed to ensure that the estimates made in the budget remain robust and appropriate.

Financial Management Code – Financial Resilience Assessment

5.60 CIPFA recommends that local authorities undertake a Financial Resilience Assessment (FRA) each year. The FRA builds on the one-year assessments required under section 25 of the Local Government Act 2003 of the robustness of the estimates used in the budget calculations and the robustness of the proposed levels of financial reserves.

5.61 The Financial Management Code states that "Effective governance and financial management is focused on ensuring that the authority is able to operate sustainably in the long term. This means that the authority needs to look beyond the limited time horizons of its funding arrangements and to consider the longer-term financing of its operations and activities."

5.62 The Financial Resilience Assessment considers long-term financial stability. It does so by considering warning signs such as the symptoms of financial stress and reviewing how effectively the authority manages its finances. This includes explicit consideration of capital resources, reserves, savings plans and the use of performance information.

5.63 The Council intends to use the information in this budget report as the starting point of its Financial Resilience Assessment. This will be a desktop exercise to tease out and address any issue with financial sustainability. The initial assessment is that the Council needs to focus on longer term planning given current uncertainties and anticipated problems on the horizon. Further details of the methodology are set out in Appendix L.

6.0 Statutory process of consultation, scrutiny and equalities analyses

Equalities

6.1 The Council has a duty to pay due regard to the need to eliminate unlawful discrimination and advance equality of opportunity and foster good relations between those who have a protected characteristic and those who don't when making decisions. Each of the budget proposals set out in Appendix C have been subject to an initial equality impact assessment (EIA) to assess their potential or likely impact on service users and employees with protected characteristics. Where the EIA process identified a disproportionately negative impact with no reasonable mitigation, the proposals were subject to a full EIA. In addition to individual EIAs, a cumulative (or overall) EIA has been produced to assess and understand the potential cumulative and compounding impact on

groups with a protected characteristic that arise from either changes across a range of services or a group of savings proposals. This EIA report is set out in Appendix C alongside the actual proposal. In summary, it has been concluded that all of the proposals are considered reasonable and have shown due regard to the Public Sector Equality Duty.

Scrutiny

6.2 A Budget Scrutiny Task Group was convened after the Cabinet published the draft budget proposals in November 2022. The task group, made up of members of the two scrutiny committees (Resources & Public Realm and Community Wellbeing) reviewed the proposals, as well as the budget development process, with relevant Lead members and officers. The task group's report and recommendations, attached in full at Appendix D, were agreed by the Resources & Public Realm scrutiny committee on 24 January 2023 as part of the Cabinet's decision making process.

Consultation

6.3 The Council recognises consultation as a key part of policy formulation, and makes considerable effort to ensure that the views of residents, businesses and other key stakeholders are taken into account. The Council has consulted on the budget options in a variety of ways. Legally, the results of consultation are something that Members must have due regard to in making budget decisions. However, consultation need not legally be the single or even most significant determining factor in choosing between difficult options, although at Brent considerable emphasis is usually placed on the results of consultation.

6.4 The Council conducted an extensive consultation process between November 2022 and January 2023 where the budget proposals for 2023/24 were presented. This included attendance at all five Brent Connects events and an online consultation on the specific budget proposals.

6.5 The detailed budget proposals were published on the Council's website, inviting comments and feedback through the online consultation portal. A number of people accessed the online consultation and provided responses. Appendix N contains further information about the results of consultation and sets out a summary of emerging themes and other key findings.

6.6 There are various business forums and associations that the Council regularly engages with that include a wide range of both small and large local businesses. These include West London Business (a non-profit business membership organisation), the Federation of Small Businesses, the Chamber of Commerce, and town centre business associations. The consultation on the budget was published in a newsletter that is sent to a large number of Brent businesses, explaining why the views of local businesses were important and how they could have their say.

6.7 The local voluntary sector is closely engaged with Brent's communities and has considerable experience of the impact of the Council's difficult choices against

a background of funding reductions. Engagement with the local voluntary sector has therefore been an important part of the consultation process. Invitations to participate in the consultation were sent to all Brent voluntary and community sector organisations. In addition, the consultation was publicised in the CVS Brent newsletter, inviting responses through the online portal.

6.8 In order to maximise the opportunity for comment the consultation was kept open to 31 January 2023. The comments above, and summarised in Appendix N, reflect the position shortly before that date to fit in with the despatch deadlines for this report. In the event that significant numbers of new comments are received subsequent to this, an update will be provided to Cabinet.

6.9 Overall, the most commented theme was the proposed increase in Council Tax. It is acknowledged that increasing Council Tax will be difficult for some households to manage in the current circumstances and sections 5.10 - 5.15 of this report sets out the rationale the Council considered as part of its decision making. In summary, the additional income will provide much needed funding to limit the impact of the significant inflationary pressures expected in 2023/24, in particular for the provision of social care, as well as preventing the wholesale cuts to the key services the Council provides that many other Councils are having to consider. In addition, it should be recognised that the Council continues to invest in the Council Tax Support scheme, which provides over £32m of support for around 28,000 households who are financially vulnerable.

6.10 One of the main aims of the consultation and communications strategy was to raise awareness of the Council's financial position, inform residents on how the Council spends its budget and ensure residents, businesses and other key stakeholders were fully aware of the opportunities to have their say, by knowing how to respond and when the consultation events were taking place. This was delivered through a variety of communication channels, including publicity on the Council's website, media briefings and use of the Council's Facebook and Twitter accounts to disseminate reminders and encourage residents to participate.

7.0 Housing Revenue Account (HRA) Budget

7.1 The proposed HRA annual budget for 2023/24 sets out proposed expenditure for housing management services, stock investment, maintenance work and new council housing development programmes, as well as rent and service charge setting proposals for 2023/24.

7.2 The HRA budget is set each year in the context of the 30-year business plan (included in Appendix Q). The business plan is reviewed annually allowing for horizon scanning and the identification and mitigation of risks in the short, medium and long term. Early identification of risks enables planning and implementation of mitigations to ensure the HRA can continue to remain financially secure and deliver on its commitments to:

- Expand and accelerate the development of new council homes
- Continue to maintain and improve existing council homes; and

- Transformation and continuous improvement of front line services to tenants and leaseholders

7.3 After four consecutive years of rent reductions, between 2016/17 to 2019/20, the Government set out its rent policy, which allows rent levels to be increased by CPI plus 1% for the next five years starting from April 2020. In light of exceptional inflation levels, government has amended its rent setting policy to allow for up to 7% rent inflation in 2023/24, compared to 11.1% if CPI plus 1% was applied. There will be a reversion to the previous rent setting arrangements from 2024/25.

7.4 The table below shows a snapshot of current average rent levels from occupied properties and the proposed increase of 7% for 2023/24. All new re-lets are charged at Formula rent and new builds are charged at Formula or London Affordable rent (LAR). Updated rent levels are reflected in the current average rent for 2022/23, the average rent can change depending on time of reporting. The average proposed rent rate for 2023/24 is £8.72 per week (7%) higher than the current financial year.

Tenant Rents for 2023/24

Table 4: Rents

Bed Size	Current Average Rent pw 2022/23	Proposed Average Rent pw 2023/24 (7%)	Proposed v Current Rent
	£	£	£
Bedsits	92.05	98.49	6.44
1	109.43	117.09	7.66
2	126.85	135.72	8.87
3	138.38	148.06	9.68
4	149.83	160.31	10.48
5	161.90	173.23	11.33
6+	170.08	181.98	11.90
Average rent	**124.70**	**133.42**	**8.72**

7.5 A rent increase of 7% is estimated to result in additional £3.5m of income when compared to 2022/23. This is estimated to be £2m less income compared to previous policy of CPI plus 1% (11.1%). In real terms, this will be the third biggest annual reduction in social housing rents since the introduction of rent restructuring two decades ago. Like most other housing providers, difficult decisions will need to be made to reduce costs in order to close the gap between rental income and increasing cost of service delivery. Brent Housing Management services have identified a target of £3m cost reduction detailed further in this report.

7.6 For tenants in receipt of housing support to help pay their rent, the cost of a rent increase will be met by their housing benefit or the housing element of universal credit, unless the level of support is reduced by factors that may apply to individual circumstances such as benefit cap. Brent Housing Management provide support to tenants who are struggling to pay their rent. The primary objective is to ensure that tenants have all the support that they can get, rather than pursuing an eviction. Support options include assessing whether the tenant is claiming all the welfare benefits that they are entitled to and arranging a suitable payment plan. After the onset of the COVID-19 pandemic, Brent Housing Management endeavoured to identify vulnerable tenants and have since kept in contact with tenants in order to ensure that they continue to get the required support to sustain their tenancy.

7.7 The net rent amounts exclude service charges. The service charges are recharges to tenants and leaseholders, which are based on the actual costs incurred for providing specific services, such as estate cleaning.

Tenants Service Charges 2023/24

7.8 Individual service charge elements are adjusted to bring them in line with the estimated contract costs of providing these services to tenants in 2023/24. The tables below show a snapshot of the current average service charges from occupied properties, compared to proposed rates, this is analysed below for services provided to tenants. The current average can change depending on time of reporting, to reflect re-lets and stock movements such as new additions.

Service charge frozen for 2023/24

7.9 Grounds maintenance service is included within the Council's wider corporate contract. The annual contribution from the HRA is estimated to offset against the HRA's proportion of the contract cost through existing charges.

7.10 The cost of maintenance and servicing for the laundry room and TV aerials is forecasted in line with service charges. Therefore, no increases are proposed for this charge for 2023/24.

Table 5: Service Charges (i)

Service	No. of Properties	Current Average Charge 2022-23	Estimated Average Charge 2023-24	Estimated Increase / (Decrease)
		(£/Week)	(£/Week)	%
Grounds Maintenance	4,813	1.31	1.31	0.00%
Laundry	25	2.59	2.59	0.00%
TV Aerial	3,206	0.73	0.73	0.00%

Service charge increases for 2023/24

7.11 The estate cleaning service was transferred in-house in 2019/20, with a commitment to pay staff at the London Living Wage before being integrated into LGPS pay scales. The cost of bringing the service in-house and the associated costs for vehicles, machinery and material is projected to be under recovered by £0.1m in 2023/24. The proposed increase of £0.52 per week in 2023/24 will not fully offset this, and therefore a phased approach to cost recovery has been modelled to allow service charges to increase over a four-year period, whilst balancing in-year budget shortfalls at the same time.

7.12 The concierge service charge is currently £10.55 per week on average. An increase of £1.17 is estimated to contribute towards inflationary cost pressures.

7.13 The helpline monitoring service charge is currently £1.74 per week on average. An increase of £0.19 per week is estimated to result in a break-even position for 2023/24.

7.14 Unmetered communal lighting, heating and hot water charges are adjusted annually in line with the forecasted energy supplier inflations for 2023/24, reflecting increased price of energy. The past year has experienced unprecedented price movement and volatility within wholesale gas and electricity prices. The projected overall cost to the HRA for energy is estimated to increase budget requirements by £1.8m in 2023/24. Cost on communal lighting is forecasted at 73% inflation on current levels, this is reflected in the proposed service charge uplift, resulting in an increase of £1.39. Although gas prices are currently projected to increase by 226%, the Council is proposing a cap for communal heating and hot water at 100%, with a view to catch up with overall energy costs over the next 4 years, in order to spread the cost for tenants. This will result in an increase of £11.85 for heating and £3.38 for hot water.

Table 6: Service Charges (ii)

Service	No. of Properties	Current Average Charge 2022-23	Estimated Average Charge 2023-24	Increase / (Decrease)
		(£/Week)	(£/Week)	%
Estate Caretaking	4,502	7.40	7.92	7%
Concierge	406	10.55	11.72	11%
Helpline Monitoring	52	1.74	1.93	11%
Communal Lighting	5,291	1.91	3.30	73%
Communal Heating	363	11.85	23.70	100%
Communal Hot Water	19	3.38	6.76	100%

District Heat Network

7.15 Unity Place in South Kilburn hosts the energy centre for the local district heat network for metered billing. It currently supplies heat and hot water to 235 properties and tenants are billed based on actual usage. The fuel contract has been renewed from 1 October 2022 to a two-year variable rate until 30 September 2024. Based on the projected fuel contract rates in the current energy market, heat tariff for 2023/24 is estimated to be a variable element of £0.12 p/kWh and a standing charge of £0.55 per day, in order to recover costs.

Table 7: Heating

Service	No. of Properties	Estimated Charge per kWh 2022-23	Estimated Charge per kWh 2023-24	Recommended Increase / (Decrease)
		(£p/kWh)	(£p/kWh)	%
Heating Tariff	235	0.04	0.12	196%
Standing Charge	235	0.44	0.55	26%

Brent Supported Living

7.16 In November 2020, tenants moved in to 11 new independent living homes at Peel Road. These homes are all one-bedroom, self-contained residential flats developed as part of previous New Accommodation for Independent Living (NAIL) programme and are held within the HRA. The properties are fully adapted and the homes benefit from communal facilities, including a garden area. There is access to 24-hour care, allowing residents to contact care staff from anywhere in the building.

7.17 The table below compares the current gross rent levels (including service charges) for these homes against the proposed increase of 7% for 2023/24. This equates to an increase of £21.73 per week when compared to the current financial year.

Table 8: Gross Rent

Current Gross Rent 2022/23	Proposed Gross Rent 2023/24 (7%)	Proposed v Current Rent
(£/Week)	(£/Week)	(£/Week)
310.48	332.21	21.73

Garage Rent for 2023/24

7.18 HRA currently has 243 occupied garages with an estimated annual income of £0.2m for 2022/23, consistent with previous year. Cabinet approved a standard

rate of pricing during budget setting in 2021/22, along with a three-year phased increase for existing occupancies that are below the standard rates (2023/24 will be year 3).

7.19 The table below shows the current standard rate and the proposed uplift of CPI +1 (11.1%) for garage rents.

Table 9: Garage Rents

Garage Charge (Net)	Current Standard Rate 2022/23	Proposed Standard Rate 2023/24 (11.1%)
	(£/Week)	(£/Week)
LBB Tenants & Leaseholder	15.62	17.35
LBB Resident	20.82	23.13
Non – Resident	26.03	28.92

HRA Budget 2023/24

7.20 The proposed budget for 2023/24 is set out in the table below and shows a net balanced budget. The budget movements are as a result of the items summarised below.

Table 10: HRA budget 2023/24

Technical Adjustments	**£m**
Rent Increase of 7% on current stock	(3.5)
Service charge uplifts to reflect cost incurred	(1.0)
Reduction in service charges for major works in line with profiled works completed	0.4
Growth	
Pay and operational cost inflation budget gap 22-23	0.4
Pay and operational cost inflation 23-24	0.7
Repairs contract inflation	1.6
Disrepair and associated temporary accommodation	0.3
Increased void repair cost	1.5
Estate caretaking services cost inflation	0.2
Communal utility supplier inflation	1.8
Leaseholder insurance contract inflation	0.1
Bad debt provision	0.5
Savings Target	
Review void standards and active interventions to reduce costs	(1.2)
Reduction in staffing	(0.9)
Reduction in support services after adjusting for commercial income	(0.3)
Reduction in costs associated with contracts and external provider spend	(0.7)
Total Net Movement	**0.0**

7.21 As mentioned above, due to a rent rise limitation, 2023/24 budget includes a £3m savings target, in addition to annual saving targets that are already incorporated into medium-term financial plans.

7.22 In order to reduce costs associated with expenditure on void properties, closer monitoring of void specifications is now in place. This is anticipated to reduce the number of major voids which have both higher specifications and longer turnaround times. Quicker turnaround times are expected to reduce the void rent loss and Council Tax liability periods. This is expected to generate a £1.2m saving.

7.23 An estimated saving of £0.8m is anticipated to be achieved by a reduction in staff. The vast majority can be achieved through the loss of posts that have been difficult to recruit to in Property Services and are currently vacant. The remainder would be achieved through rationalising posts where there are multiple full time employees.

7.24 A £0.3m saving is anticipated as a result of general efficiencies and a reduced expenditure associated with support services.

7.25 The HRA is carrying out an exercise to assess exclusions within the responsive repairs contract which are not included in the price per property schedule and are therefore higher cost to the HRA. This helps to ensure value for money and reduce duplication for works. The Tenant Management Organisations are now being reviewed to bring their management fees in line with the current HRA position which will result in a small saving plus recouping costs incurred by the Council such as repairs which fall under the TMO's responsibility to cover. This is expected to generate a £0.7m saving.

7.26 The proposed 2023/24 HRA budget summarised in a table below ensures a break-even balance at year end. The opening reserve balance has reduced by £0.9m compared to last year, due to partially funding a provision in 2021/22 for identified capital works to the Granville New Homes blocks that have transferred to the HRA from First Wave Housing on 1st April 2022. HRA reserves were used to cover the timing difference and the provision will be released when works commence, returning the HRA reserves to previous value.

Table 11: HRA Budget 2022/23 v Draft Budgets for 2023/24

HRA Budget 2022/23 v Draft Budgets 2023/24	**(1) Budgets 2022/23**	**(2) Draft Budgets 2023/24**	**(2-1) Variance**	**Variance Explanation (2-1)**
Description	**£'000**	**£'000**	**£'000**	
Rents and Service Charge	(52.8)	(57.0)	(4.2)	Tenant rents and service charges offset by rent loss through voids and RTB sales
Non-Dwelling Rents	(0.5)	(0.2)	0.3	commercial income offset against savings in support services
Leaseholders' Charge for Services and Facilities	(2.7)	(2.9)	(0.2)	Uplift to reflect increased cost of rechargeable services
Major Works and Other Contribution Towards Expenditure	(1.5)	(1.1)	0.4	Service charge reduction based on profiled major works completion
Total Income	**(57.5)**	**(61.2)**	**(3.7)**	
Repairs and Maintenance	13.6	15.0	1.4	repairs contract uplifts, provision for disrepairs and voids offset by efficiency savings

Supervision and Management	12.2	11.9	(0.3)	operational cost inflations offset by savings in management and support services
Special Services	4.9	6.9	2.0	caretaking and communal utility supplier inflation
Rent and Rates and Other Charges	1.4	1.5	0.1	council tax and insurance contract inflation
Depreciation of Fixed Assets	15.5	15.5	0.0	
Bad or Doubtful Debts	0.7	1.2	0.5	Provisions for non-payments
Capital Financing and Debt Management	9.2	9.2	(0.0)	
Total Expenditure	**57.5**	**61.2**	**3.7**	
(Surplus)/or Deficit for the Year on HRA	**0.0**	**0.0**	**0.0**	
Housing Revenue Account brought forward	(0.4)	(0.4)	0.0	
(Surplus)/or Deficit on HRA	0.0	0.0	0.0	
Closing balance	(0.4)	(0.4)	0.0	

HRA Stock Improvement and Major Works Budgets 2023/24 and 2024/25

7.27 Planned works include refurbishments such as new roofs, windows, lifts, kitchens, bathrooms, heating systems and planned fire safety works. Major works relate to extensive refurbishment programmes, such as the planned major refurbishment of four high rise blocks.

7.28 The Council Housing Asset Management Strategy (AMS) 2022-2026 sets out a vision for responsive repairs, investment, reform and improvement of the stock and its performance. The AMS consists of a 5-year budget requirement totalling £80.8m and has outlined requirements to increase investment in tower blocks over the next two years. The overall major works programme budget has been set at £19.1m for 2023/24 and £29.8m for 2024/25. Increased budget requirements are projected to require borrowing to cover funding shortfalls in the capital programme, this is estimated to result in the need to reduce cost by an average £0.5m to fund cost of borrowing.

New Council Homes Programme 2023/24

7.29 The development and management of new council homes and affordable housing remains a key priority in the Council's Housing Strategy and the HRA Asset Management Strategy. The Council has an ongoing commitment to deliver 5000 new affordable home in the borough by 31 March 2024, this includes the provision 1,000 to be delivered directly by the Council. As of November 2022, 684 new homes have been delivered. Due to the ongoing need for affordable housing in Brent, the Council has committed to directly deliver an additional target of 700 new affordable homes by 31 March 2028 and was awarded £111m of grant funding from Greater London Authority (GLA). The forecast capital investment on acquisitions and building new council homes in 2022/23 is £55m, with a capital budget in 2023/24 set at £140.2m.

Housing General Fund

Hillside Rent Setting

7.30 In addition to the dwellings contained within the HRA, the Council also continues to hold dwellings in the General Fund (GF). These dwellings were formerly held by the Stonebridge Housing Action Trust (HAT) and were transferred to Brent Council in August 2007 when the HAT was dissolved. The Council currently owns 324 properties under this scheme and Hillside Housing Trust (part of Hyde Housing Group) manages these properties on the Council's behalf.

7.31 The table below sets out the rent levels for 2022/23, with an average increase of £9.21 per week for 2023/24.

Table 12: Average Rent Increase

	Weekly Rent 2022/23 (£)	Weekly Rent 2023/24 (£)	Increase (£)	Increase (%)
1 Bed Flat	£107.81	£115.35	£7.54	7%
2 Bed Flat	£127.63	£136.56	£8.93	7%
1 S/croft Elders	£107.81	£115.35	£7.54	7%
2 S/croft Elders	£127.63	£136.56	£8.93	7%
2 Bed House	£138.62	£148.32	£9.70	7%
3 Bed House	£151.92	£162.55	£10.63	7%
4+ Bed House	£159.93	£171.12	£11.19	7%

7.32 Hillside are also responsible for setting service charges across the stock, including those retained by the Council. The average service charge per week

for 2023/24 is set at £7.58 per week, an increase of £0.49 from the 2022/23 average, based on an uplift of 7%.

Housing Private Finance Initiative (PFI)

7.33 The Housing PFI refers to 364 units of rented accommodation managed by Hyde under a PFI contract. The stock is made up of a mixture of Temporary Accommodation, Discounted Market Rent and Affordable Rent properties, which are up to 80% of market rates and are capped at the London Affordable Rent (LAR) set by the GLA. As per the cabinet decision on the 17 January 2017 in regards to PFI Housing Tenancy Conversions, Temporary Accommodation units are being phased out with the units being converted into Affordable Rent and Discounted Market Rent properties.

7.34 Throughout the conversion programme it has been identified that households cannot afford to maintain tenancies that exceed LHA and whilst a small number of tenancies remain lower than this threshold, the proposal is to hold the rents at the current levels, with no increase for the coming year. This is to ensure that there is a consistent approach to rent changes across the portfolio and also takes into consideration lack of affordability for households living in PFI properties.

Travellers' Site Pitch Rent

7.35 The current weekly pitch rent is £156.42. It is proposed to increase this by 7% to £167.37 for 2023/24. Travellers' site pitch rent is estimated to generate an annual income of £0.25m.

8.0 Schools Revenue Budget

8.1. The final DSG allocations were announced on 16 December 2022 and the proposed budget was presented to the Schools' Forum for endorsement on 19 January 2023. Following the announcement made by the government in the Autumn Statement to invest an additional £2.3 billion in schools for 2023/24 and 2024/25, the Schools Block which supports mainstream schools, has a confirmed allocation of £270 million (of which £9 million will be allocated as a separate grant), representing an increase from the 1.2% (announced in July 2022) to 5.3%. This equates to an overall increase of £14 million compared to 2022/23. This increase is lower than the national percentage increase of 6.3% but slightly higher than the average of 5.2% for local authorities in London. The London position is driven by a decline in pupil numbers according to the dataset underpinning the notional National Funding Formula (NFF). As in previous years, the Council will continue to set a local funding formula for mainstream schools in 2023/24, although the total funding available will be determined by the NFF.

8.2. In March 2022, the government confirmed its commitment to introduce the direct NFF. Local authorities will be required, from 2023/24, to move their local funding formula factors by 10% towards the NFF factors and must use all and only the NFF funding formula factors to calculate schools' budget allocations.

The implications to Brent schools were presented to Schools Forum in June 2022.

8.3. The government recently completed a consultation on the detail of the implementation of the direct NFF. The consultation included proposals for how funding for schools experiencing significant growth in pupil numbers or falling rolls could operate under the direct NFF and more importantly, the determination of SEN notional budgets for mainstream schools' and disability support within the direct NFF allocations. Results of the consultation will be published by the end of the financial year.

8.4. The number of Brent schools experiencing difficulties in 2022/23 has increased with 67% projecting an in-year deficit. 23% of these schools' plan to use over 50% of reserves to balance their budgets in 2022/23. Schools are feeling the impact of rising inflationary costs, including increases in energy prices alongside teachers' pay increasing by 5% in 2022/23 and starting salaries rising by 8.9% to £30k. A number of Brent schools are also experiencing falling rolls and as a result have had significant reductions in funding. This is requiring schools to make strategic decisions to mitigate the impact of this, including the consideration of staffing restructures. Alongside measures to support schools, such as capping admission numbers, the Local Authority has established a School Place Planning Working Group to review the sustainability of provision in primary planning areas.

8.5. The High Needs block (HNB) of the DSG allocation will be £82 million, a 10% (£7 million) increase in 2023/24 compared to 2022/23. Following the autumn statement, funding increased from the previously announced position for 2023/24 of 5% to 10%. This is the same as the London average but slightly lower than the national average increase of 11%, due to reductions in pupil numbers.

8.6. Pressures against the HNB remain, due to increased demand for Education Health and Care Plans (EHCPs) which remains a regional and national issue. Despite the additional funds, the demand pressures continue to grow and to set a balanced DSG budget in 2023/24 the local authority will request, via the Schools' Forum, a 0.5% transfer from the Schools Block. The pressure in the HNB has led to there being a £15.1 million deficit in the DSG carried forward from 2021/22 and further pressures in 2022/23 will increase the deficit position. The statutory override which was put in place to enable local authorities to hold deficit balances was due to end in 2022/23, however, this has now been extended for a further three years.

8.7. The DfE requires local authorities with an overall DSG deficit to have a Management Plan to recover the deficit over a number of financial years. The Schools Forum have been presented with actions being taken to manage demand, improve sufficiency of places and financial management to recover the deficit in the medium to long term. These include establishing more SEND provision in the borough including building a new special school and developing new Additionally Resourced Provisions (ARPs) as part of the School Place Planning Strategy 2019-23 Refresh paper agreed at Cabinet in November

2021. In addition, ensuring there is full cost recovery from other local authorities that place pupils in Brent special schools including administration and other specific costs; efficiencies through commissioning arrangements and continued central government lobbying.

8.8. Brent is part of the newly introduced DfE programme called Delivering Better Value (DBV) in SEND to provide dedicated support and funding to help local authorities reform their high needs systems. The DBV programme has made a provision of £85m over 3 years from 2022/23 to support a wider group of LAs with smaller DSG deficits. Brent is in the first tranche of 20 local authorities the DfE is working with. The expected outcomes include a comprehensive diagnostic to identify root cause cost drivers and mitigating solutions or reforms and support in developing a quality assured Management Plan and the opportunity to bid for a £1 million grant to deliver the actions in the Management Plan. The aim of the DBV programme is not to address the historic deficit but to support Brent to return to an in-year balance whilst delivering high-quality services. Any efficiencies that are identified from the programme may allow funds to be released to address historic deficits.

8.9. The government's response to their consultation on the 2022 SEND Green paper is also likely to bring about reforms to the funding system, a major part being the introduction of a new national framework of banding and price tariffs for high needs funding. Bandings would cluster specific types of education provision aligned to need. Brent like most local authorities uses a banding system to allocate funding ranging from Band 1 for lower levels of need to Band 6 for the most complex needs. The introduction of tariffs would help to control high costs attributed to expensive provision. National funding bands have the potential to establish a more consistent basis for the funding of provision and all specialist providers will need to ensure the provision they offer is in line with the national SEND standards. The DfE proposes to work with local authorities and provide clarity on the process.

8.10. The Early Years Block funds early education entitlements for children aged 2, 3 and 4. A consultation on the Early Years National Funding Formulae (EYNFF) and Maintained Nursery School (MNS) supplementary funding, that focused on updating underlying data within the EYNFF, mainstreaming the current separate teachers' pay and pensions grants into the EYNFF and into the MNS supplementary funding and reforming the distribution of the MNS supplementary funding concluded in September 2022. The consultation results have been published and majority of the proposals had favourable responses and the EYNFF has been updated to reflect the proposed changes, including mainstreaming the teachers' pay and pension grant by baselining the grant within the EYNFF.

8.11. The key principle of allocating the funding for the Early Years Block remains the same i.e., 95% of funding received is allocated directly to providers with the remaining 5% retained for central services. Nationally the government announced a £180 million increase for 2023/24 and £170 million for 2024/25 in the 2021 Spending Review however, a further £20m was announced for 2023/24 to support providers with the additional National Living Wage costs

associated with delivering the free childcare entitlements. For Brent, the allocation for 2023/24 will be £24.5 million an increase of £1.3 million compared to 2022/23.

9.0 Pay Policy Statement 2023/24

9.1 Section 38 of the Localism Act 2011 requires local authorities to publish an annual 'Pay Policy Statement', setting out their policies in respect of chief officer remuneration and other specified matters. Regard must be had to guidance to be published by the Secretary of State in preparing the statement, which must be approved by Full Council. The Council is then constrained by its pay policy statement when making determinations on chief officer pay, although the statement may be amended at any time by a further resolution of the Full Council. No new guidance has been published since the statement was adopted for 2022/23 and so there are no proposed changes to the statement related to the guidance. The Draft Pay Policy Statement, attached as Appendix P, contains minor updating and cosmetic changes from the Statement adopted by full Council for the last financial year.

10.0 Capital Programme Budget 2023/24 – 2027/28

10.1 The Council's Capital Programme forms part of the medium-term financial strategy and is key to the overall budget setting process. The programme is focused on supporting the delivery of the Council's statutory responsibility in relation to ensuring there are sufficient school places available for children and young people whilst, investing in new affordable housing and in our existing housing stock, town centres, public realm, and community facilities across Brent.

10.2 A key element of the Council's successful financial strategy has been to grow the capital investment programme and enable it to deliver substantial revenue savings over the medium term financial planning period and beyond.

10.3 The Capital and Investment Strategies (Appendix G & H) provide further details on the overall capital strategy, which sets out how capital investment supports the delivery of the Council's objectives.

10.4 The Council's Capital Programme utilises a variety of funding sources including capital receipts, grants, S106 and CIL, reserves, contributions from revenue and borrowing as a last resort. Affordability remains an important influence on the Council's borrowing strategy following the Council's shift to a net borrower following the cost effective approach of utilising internal resources to delay the need to borrow externally. The programme has a mixture of invest to save, grant funded and self-financing projects to help reduce the treasury risk. Hence our strategy looks to undertake external borrowing to fund projects as a last resort.

10.5 The current economic environment is having a significant impact on both affordability and delivery of the capital programme. Rising costs especially in the construction industry are making it extremely difficult to estimate the

potential cost of developments. Interest rates have also been volatile with current PWLB rates at 5% from circa 2% this time last year. Together these create a challenging environment to forecast future borrowing rates and the impact on affordability of delivering the capital programme. The budget contains a significant number of schemes that are financed by borrowing. These schemes are all under regular review to ensure their viability. The focus of this capital programme is to ensure best value for money including facilitating delivery of essential services with a focus on mitigation of key areas of risk and investing in opportunities to provide efficiency savings. The Council is likely to have to pause schemes with viability challenges with a review at a later date, reduce their scope or remove them entirely from the programme to ensure funding can be prioritised appropriately. A decision of this nature will be reported to Cabinet via a project update and the quarterly monitoring reports.

10.6 S106/Community Infrastructure Levy (CIL) will be utilised to undertake major infrastructure projects meeting the conditions or terms for funding. The capital programme includes CIL funded schemes totalling £46m. The total CIL allocation includes contributions towards the fit out cost of 3 medical centres, a new facility in Wembley for the College of North West London, the new Morland Gardens educational facility, a new pedestrian and cycle bridge in Alperton and contributions towards community facilities in Stonebridge, Preston Community Library, Learie Constantine Centre and Brent Indian Community Centre.

10.7 The Council has embarked on an extensive Capital Programme to invest c£899m over 5 years, 2023/24 to 2027/28. The investment includes significant spend across the General Fund and Housing Revenue Account (HRA) to support the strategic vision of the Council across the borough. Since the capital budget was agreed by Council in February 2022 the pipeline projects approved and promoted during the year have been included in the 2022/23 to 2027/28 Capital Programme. The balance of provisional schemes held in the pipeline is currently £531.6m for 25 projects. The pipeline provision has not been included in the Capital Programme set out in Table 13 and Appendix E but are shown as a separate summary in Appendix F.

10.8 A summary of Capital Programme arranged according to portfolio for the 5 year period 2023/24 to 2027/28 is set out in Table 13. The detailed Capital Programme and financing is set out in Appendix E.

10.9 The 2022/23 current revised budget is £232m. The revised budget is subject to change as new schemes are approved prior to Council in February 2023. Any budget changes post the Quarter 3 monitoring report will be updated in subsequent budget report to Cabinet.

Table 13: Summary Capital Programme

Portfolio	BOARD (PROGRAMME)	2022/23 (Revised Budget)	2023/24 Budget	2024/25 Budget	2025/26 Budget	2026/27 Budget	2027/28 Budget	TOTAL 2023/24 to 2027/28
		£m	£m	£m	£m	£m	£m	£m
Resources: Cllr Mili Patel	Corporate Landlord	17.317	10.333	27.063	16.302	8.908	27.740	**90.345**
Regeneration, Property & Planning: Cllr Shama Tatler	South Kilburn	11.510	27.036	13.625	2.170	11.426	7.085	**242.946**
	Regeneration	9.394	74.061	63.740	28.801	15.000	-	
St Raphael's: Cllr Shama Tatler	St Raphael's	1.907	31.700	-	-	-	-	**31.700**
Regeneration, Property & Planning: Cllr Shama Tatler	Public Realm	19.548	12.867	8.873	7.833	-	-	**54.687**
Public Health, Culture & Leisure: Cllr Neil Nerva	Public Realm	0.378	-	-	-	-	-	
Environment: Cllr Krupa Sheth	Public Realm	1.204	12.580	2.948	1.401	1.034	7.150	
Children, Young People and Schools: Cllr Gwen Grahl	Schools	12.446	35.097	20.415	2.230	-	-	**57.742**
Housing, Homelessness and Renter Security: Cllr Promise Knight	Housing (GF)	71.745	80.019	76.315	26.259	4.661	-	**539.444**
	Housing (HRA)	59.443	156.945	113.315	37.045	22.650	-	
	Housing (i4B Phase 1&2)	19.900	18.447	-	-	-	-	
Adult Social Care: Cllr Neil Nerva	Housing (Supported Living)	7.649	2.268	0.820	-	-	-	
	Total	**232.440**	**461.353**	**327.114**	**122.743**	**63.679**	**41.974**	**1,016.864**

10.10 The Capital Programme is comprised of projects approved annually by Cabinet as well as new approvals in year. New capital schemes and projects will usually be added to the Capital Programme as part of the annual budget setting process, however, the governance arrangements allow for new schemes and projects including those promoted from the pipeline provision to be added in year, subject to appropriate approval.

10.11 The Capital Programme detailed in Table 13 above currently excludes slippage from the 2022/23 Capital Programme. Estimated slippage and re-profiled projects are detailed in the Quarter 3 Capital Monitoring Report to Cabinet in January 2023. The potential slippage from 2022/23 will be reviewed at the end of the financial year and reported to Cabinet in July 2022.

10.12 There are a number of key projects supported in the 2023/24 – 2027/28 Capital Programme, including:

Corporate Landlord

Facilities Management (*New*)

10.13 The planned programme of works to the value of £1.5m per annum will allow the continued investment in Council owned assets. This includes building improvement projects identified at the Civic Centre, Willesden Green Cultural Centre and the wider operational estate buildings.

Customer Experience Improvements at the Civic Centre (*New*)

10.14 The redesign of the face-to-face public spaces in the Civic Centre will allow an improved service delivery to residents and customers. The project works totalling £1.96m include improvements to accessibility, expanding the Hubs, self-service, Libraries and Arts and Heritage offer whilst also unlocking efficiencies in how customer facing services operate.

Regeneration

South Kilburn Estate Regeneration

10.15 Our multi-award winning 15-year programme that will deliver 2,400 new high quality homes of which around 1,400 will be made available to existing South Kilburn secure tenants including new larger high quality urban park, improved public realm, new primary school and health facilities, and improved environmental standards and a site-wide energy solution.

10.16 Over 1,100 homes have been delivered to date with approximately 60% of those being affordable rent for existing secure tenants of South Kilburn. With over 512 homes currently on site and a further c626 homes going to planning this year.

10.17 The planned expenditure from 2023/24 over 5 years is £61.3m for the delivery of homes including infrastructure improvements. The programme is self-

financing and is expected to be fully funded by a combination of capital receipts and grants.

CIL contribution towards Three Medical Centres

10.18 In April 2020, Cabinet approved a capital contribution from Strategic Community Infrastructure Levy (SCIL) of up to c£3.5m for use towards the fit out costs of three new medical centres, in Wembley Park, South Kilburn and Alperton. The expansion of the healthcare facilities will help meet the needs of the borough's growing population.

Pedestrian/cycle footbridge over the Grand Union Canal (New)

10.19 In December 2022 Cabinet approval for Strategic Community Infrastructure Levy funding to deliver a proposed new pedestrian/cycle footbridge over the Grand Union Canal in Alperton to support regeneration and growth in the area.

UK Shared Prosperity Fund (UK SPF) (New)

10.20 The Council was successful in securing £1.1m of capital funding via the UK SPF to deliver a number of communities and place projects across the borough including a horticultural centre for Post-16 SEND provision and the redevelopment of the Welsh Harp Environmental Education Centre.

Wembley Housing Zones

10.21 In August 2021, Cabinet approved the investment of approximately £130m, funded by a mixture of grant from Greater London Authority, capital receipts and prudential borrowing. This scheme allows for council-led mixed-use regeneration of the eastern end of Wembley High Road within the Wembley Housing Zone.

Public Realm

10.22 There will be continued investment in public realm to ensure the infrastructure is fit-for-purpose and achieves our vision of making use of the opportunities presented by developments within the borough.

10.23 The Highways Capital Scheme Programme £3.5m annual highways capital maintenance budget is used to maintain carriageways and structures. The council has agreed to invest a further £15m over the next four years into planned maintenance. It is intended to deliver £2m of that in this year 2022/23, and the remaining £13m over the following three years. Because of the relatively poor condition of the Principal Road network, it is intended that £4m of the £15m be spent on Principal Road maintenance, with the remainder being spent on footway reconstruction.

Integrated Street Cleansing & Waste Contract Fleet

10.24 There is £21m in the budget to purchase fleet required to deliver the Integrated Street Cleansing & Waste Contract, the borrowing costs to fund the asset purchases will be offset by equivalent savings in the revenue area.

10.25 The Council receives a fixed block of capital funding annually from Tfl. In 2023/24, the Council has initially been allocated £1,044m, which comprises £1.008m under the Safer Corridors and Neighbourhoods programme and £36,000 under the Cycle Parking programme. Funding for other 2023/24 programmes, such as Bus Priority and Cycle Training, is still to be confirmed. In the absence of confirmed funding allocations for 2024/25, TfL has asked boroughs to submit a spending programme for that year to the value of their 2023/24 LIP funding allocation.

Parks Improvement Programme

10.26 The Parks Service is investing £1.43m to improve various areas of aging infrastructure across the borough's parks; including pathways and playgrounds. They are also seeking to install a number of new welcome notice boards with improved maps of each location, wildflower meadow information boards and to make infrastructure improvements to allotments with new fencing, pathways and new sustainable toilets.

Schools

Special Educational Needs and Disabilities (SEND) Schools

10.27 In January 2022, Cabinet approved a £44.2m investment to provide 427 additional school places and accessibility improvements for the growing number of children in the borough with SEND. The Council has statutory responsibilities in relation to children and young people with special educational needs and disabilities (SEND), that require the Council to ensure that there is suitable provision to meet their needs.

10.28 The Programme will meet this demand via a number of work-streams, including construction of a new build SEND School, Additionally Resourced Provision (ARP), expansion of existing SEND schools and capital improvement projects. In 2023/24, the construction works for the projects within the work-streams will be delivered.

Schools Capital Improvement (*New*)

10.29 The Council is responsible for 38 community and foundation schools and nurseries across 41 sites in Brent. The Council has a statutory duty to undertake major projects at these schools to ensure the buildings are weather tight and provide a safe environment for education.

10.30 Funding is provided to carry out these works by the Department for Education (DfE) via the School Condition Allocation (SCA). This funding is provided each year based on an assessment by the DfE of high level building condition need and is provided to meet Brent’s local condition priorities across its schools. The

Council places SCA monies in a specific capital budget, the School Asset Management Programme (AMP) budget, to meet its statutory requirement.

10.31 The 2023 – 2026 AMP Programme includes 47 school condition improvement projects across the 41 school sites with a total programme budget of £7.5m across the three years. For 2023/24, the Council expects to deliver 16 projects within a budget of £2.5m.

Relocation of Islamia Primary School (*New*)

10.32 In September 2022, Cabinet approved the relocation of Islamia Primary School from its existing site in Salusbury Road to the vacant Strathcona Site. The proposed capital investment is up to £10m depending on the option chosen with the preferred option expected to cost £9.1m. A consultation process has commenced on the relocation of the school to which the Governing Body is responsible for making this proposal. It is expected that this proposal will come back to Cabinet for a decision to relocate the school in early 2024/25.

10.33 It is expected the majority of the capital expenditure will be made in financial years 2023/24 and 2024/25 subject to the outcome of the consultation process and the resultant decision.

Housing Programme

10.34 The development and management of new and existing Council housing continues to be a key priority as reflected by ongoing investment in housing repairs, maintenance and improvements.

General Fund Housing

10.35 The General Fund is set to spend £170m over the next four years from 2023/24 in mixed-use developments. This investment will deliver 586 homes. Where GLA grant is utilised the properties will transfer to the HRA upon completion of the scheme.

Contingency Programme (*New)*

10.36 To counter cost uncertainty across the programme schemes; particularly for those schemes yet in contract, a contingency of £9.1m has been included for 2023/24.

Empty Property Grant (*New)*

10.37 Investment of £2.1m towards securing nomination rights for empty homes across the Borough will continue to alleviate homelessness through obtaining suitable forms of accommodation whilst reducing the spend on more expensive temporary accommodation. This work has been ongoing for a number of years and has contributed to the availability of units that would be otherwise lost to the private sector.

i4B Holdings

10.38 i4B is acquiring units across the borough and purchasing street properties as affordable rented homes to alleviate the housing pressures, reduce the financial pressure and number of families in temporary accommodation with the Council acting as lender for the balance of the funds. The Council provides a mix of equity investment and loan to supplement the existing i4B street purchases programme.

10.39 Current plans include the provision of 60 street properties annually to increase the Council's temporary accommodation provision and identification of new build opportunities. The 2023/24 Capital Programme includes £18m planned expenditure in 2023/24.

New Council Homes Programme (HRA)

10.40 In 2022/23, planned expenditure on new Council homes and acquisitions is £55m. Over the next 4 years from 2023/24; planned investment in the New Council Homes Programme is £265.6m.

RTB Affordable Housing

10.41 The Council retains capital receipts from Right-to-Buy (RTB) sales after deducting debt repayment and other costs. The Council has 3 years to spend the receipts on affordable programmes, capped at 40% of the construction cost. RTB receipts cannot be combined with other funds provided by the GLA.

10.42 The Council is required to spend £9.6m within 3 years to meet its RTB targets, this amount is currently allocated across new build and acquisition projects in the capital programme. The picture is dynamic, as the Council needs available schemes to complete on schedule; therefore, officers are also exploring the possibility of gifting RTB receipts to other Registered Providers in return for an interest in affordable housing units.

Major Repairs & Maintenance of council stock

10.43 A key aim for the Council has been the government target of bringing 100% of social homes up to the decent home standard. The Council has invested in its HRA properties to ensure that it meets, and continue to achieve the decent homes standard.

10.44 The Council continues to invest in repairs, maintenance and improvement works in order to maximise the life of the assets. The HRA Capital Programme sets out planned expenditure of £19.1m for 2023/24.

Fire Safety Works

10.45 The safety of our residents is our main priority and we continue to take a robust approach to our statutory duties under health and safety. The pipeline provision includes a provisional sum of £2.1m for fire safety works on our housing stock.

Contingency Programme (*New)*

10.46 The New Council Homes Programme is reaching a critical phase. A number of schemes are expecting tender returns and some tenders have returned materially in excess of the approved budget allocation. This uncertainty in the construction industry is a consequence of current prevailing market conditions. In order to offset risk and cost uncertainty, a contingency of £8.1m has been included for 2023/24.

Fulton Road (*New*)

10.47 The acquisition of the development at Fulton road will provide an additional 294 homes at a mixture of London Affordable Rent and London Living Rent within the Wembley Park ward. The site will prioritise the delivery of 3-bed homes to meet the current housing demand for larger family sized accommodation. The homes are expected to be delivered. The scheme is expected to cost circa £85.6m and completion of the construction is anticipated in July 2026.

St Raphael's

10.48 The Council has committed to delivering significant placemaking improvements across the estate with a £30m investment in improvements to the care and maintenance of the estate and target green spaces, waste management, parking and a new community centre.

Statutory Capital & Treasury Reports

10.49 In recognition of the importance of capital investment in asset and treasury management to Council activities, CIPFA and central government have compiled codes of practice and regulations for Councils to follow. These ensure that Councils have effective processes and practices in place to control, manage and govern capital investment decisions, that include borrowing and treasury management practices.

10.50 The requirement on local authorities in relation to this statutory guidance is that they should "have regard" to such guidance and each year must produce a number of documents/strategies for approval by council or a nominated body.

10.51 The various statutory reports are as follows:

- Capital Strategy (high-level report covering the basics of capital programme, treasury management and investments for service commercial reasons) – Appendix G.

- Investment Strategy (disclose the contribution that investments make "towards the service delivery objectives and / or place making role of the local authority – Appendix H.

- Treasury Management Strategy (the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice 2021 Edition (the CIPFA Code) requires the Council to approve a treasury management strategy before the start of each financial year. The strategy outlines a framework within which the Council manages its cash flows, borrowing and investments, and the associated risks – Appendix I.

- Minimum Revenue Provision (the process for calculating the annual charge to the revenue account of provision to repay debt incurred in respect of capital expenditure financed by borrowing or other long term credit arrangements (such as PFI) – Appendix J.

11.0 Financial Implications

11.1 The Council's financial position has been set out in this report and Members are under a legal obligation to set a balanced budget. In doing so they are obliged, under normal administrative principles, to take into account the various relevant factors, particularly in respect of consultation and equalities. In doing so Members are, of course, entitled to exercise their political judgement, paying regard to the relevant factors rather than being absolutely determined by them.

11.2 The budget report sets out a comprehensive picture of the council's finances over the short, medium and long term to assist in the decision making process in setting the 2023/24 budget.

11.3 In considering the budget report, a key consideration should be the delivery of the savings programme as it presents substantial management challenges. Again, considerable management attention has been, and is being, devoted to ensure that these can be delivered, but it is important to stress again the inherent risks in delivering such a complex programme.

11.4 In addition to the risk of delivery of the savings programme, there remains considerable uncertainty on the future of Local Government funding from 2024/25. In consequence, and following a comprehensive review of budget assumptions, the general reserve is expected to increase from £15m to £18m to ensure that the Council continues to follow the principle set out in section five regarding the appropriate level of generally usable reserves. This level is still relatively low for London, but is not unreasonable.

11.5 That said, the budget now proposed is realistic and affordable, albeit challenging. The increases in Council Tax set out, if agreed, will generate significant additional revenue over time, minimising the number of difficult new decisions about funding for specific services to be proposed. If agreed, this budget would provide for affordable services in 2023/24.

11.6 Formally, this section of the report is the report of the Section 151 officer to which the Council is required by Section 25 of the Local Government Act 2003 to have regard confirming that if the budget as proposed were to be agreed the estimates made for the purposes of the calculations are robust and the proposed financial reserves are adequate. The Section 151 officer concludes

that the proposed level of reserves are adequate and the estimates underpinning the proposed budget are robust.

12.0 Legal Implications

12.1 These are set out in Appendix O.

13.0 Equality Implications

13.1 Section six of this report provides more details of the approach to complying with the Equalities Act 2010 and the outcome of equalities impact assessments.

14.0 Consultation with Ward Members and Stakeholders

14.1 Section six of this report provides more details of the statutory consultation process with regards to setting the 2023/24 budget.

15.0 Human Resources

15.1 Of the proposals identified in Appendix C, there are some where there is a potential impact on staffing and could be subject to redundancy. However, the number of redundancies is not expected to be significant as a result of the voluntary redundancy scheme that took place in 2022.

15.2 The Council will apply its Managing Change Policy and Procedure in the application of all restructuring arrangements which have an impact on staff, consulting with staff and trade union representatives accordingly.

Related Document:
Draft Budget 2023/24, Cabinet 14 November 2022

Report sign off:

Minesh Patel
Corporate Director of Finance and Resources

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Appendix A: Overall Revenue Budget 2023/24

The table below sets out the revenue budget for each directorate in 2023/24 and how this has changed from the 2022/23 budget.

	2022/23 Current Budget £m	Growth £m	Savings £m	Technical Adjustments £m	2023/24 Approved Budget £m
Service Area Budgets					
Adult Social Care and Health	126.2	15.3	(4.3)		137.3
Children and Young People	62.9	8.0	(0.8)		70.1
Communities and Regeneration	5.6	0.0	(0.3)		5.3
Finance and Resources	13.2	0.0	(1.5)		11.8
Resident Services - General Fund	73.1	4.7	(4.0)		73.8
Governance	13.9	0.1	(0.4)		13.7
Total Service Area Budgets	**295.1**	**28.3**	**(11.3)**	**0.0**	**312.1**
Central Budgets	28.0	20.7	(2.2)	(0.1)	46.3
Total Budget Requirement	**323.1**	**49.0**	**(13.5)**	**(0.1)**	**358.4**
Funding					
Business Rates	(95.7)			(11.5)	(107.2)
Revenue Support Grant	(25.8)			(3.2)	(29.0)
Specific Grants	(61.5)			(9.9)	(71.4)
Council Tax	(140.1)			(10.7)	(150.8)
Total Funding	**(323.1)**	**0.0**	**0.0**	**(35.3)**	**(358.4)**

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Appendix B: MTFS Model

CHANGES TO THE BUDGET YEAR-ON-YEAR		BUDGET 2022/23 £m	ADJUSTMENTS Growth £m	Savings £m	Technical £m	BUDGET 2023/24 £m	Relative Changes
Base Budget		323.1				323.1	
Growth							
Demographics							
- ASCH			3.7			3.7	
- CYP			4.0			4.0	
- Other Departments			1.3			1.3	
	Sub-total		9.0			9.0	
Inflation							
- ASCH			9.7			9.7	
- CYP			3.9			3.9	
- Contracts			4.1			4.1	
	Sub-total		17.7			17.7	
Pay Award			8.5			8.5	
Service Changes			13.8		0.4	14.2	
			49.0				
Savings							
Service Transformation				(7.5)		(7.5)	
Restructure				(3.8)		(3.8)	
Reduction in provision				(0.6)		(0.6)	
Procurement				(0.1)		(0.1)	
Income generation				(0.5)		(0.5)	
Digital				(0.9)		(0.9)	
Corporate items					(0.6)	(0.6)	
				(13.5)			
		323.1				**358.4**	
Funding							
RSG		(25.8)			(3.2)	(29.0)	
Business Rates		(95.7)			(11.5)	(107.2)	
Council Tax		(140.1)			(10.7)	(150.8)	
Specific grants		(61.5)			(9.9)	(71.4)	
		(323.1)				**(358.4)**	

MTFS ASSUMPTIONS	
Growth	The growth proposals in the budget are largely responsive in nature rather than introducing new service provision. This is a direct result of the volatile and unpredictable economic climate faced by the Council where high inflation and rising demand and demographic pressures increase the cost of providing existing services to current service standards.
Demographic Growth	This largely relates to changes in the make up of the population due to ageing (ASCH) and demand pressures on the placements, transitions, homecare and children with disabilities budgets (CYP).
Inflation	General inflation is high with CPI in September 2022 at 10.1%. Specific inflationary pressures are being experienced in social care where rising demand and a shortage of supply puts upwards pressure on prices. Also the war in Ukraine has pushed up energy and food costs. These inflationary pressures have direct effects on goods bought by the council and indirect effects via increased prices for services and supply contracts.
Pay Award	As a response to inflation and the cost of living crisis, pay awards are anticipated to be higher than the norm in recent years. If future pay awards are based on flat rate increases, this tend to increase the cost of the pay award at Brent due to extra London weighing and the associated increase in national insurance and pensions on costs.
Service Changes	These are unavoidable changes resulting from new burdens, increases in ringfenced grants and externally driven changes to service levels.

	£m
Council Energy Bills and Street Lighting	5.0
Residents Support Fund	3.0
ASC Grant - Hospital Discharge	1.9
Contingency	1.5
Capital Programme Financing	1.2
Public Health	0.7
Concessionary Fares (Freedom Passes)	0.5
	13.8

Savings - Full Details in Appendix C	New savings proposals totalling £18m were put forward. A level of funding in the Local Government Finance Settlement has enabled £4.5m of 2023/24 savings to be deferred into future years.
Service Transformation	These savings involve changing methods of service delivery to match current demand levels whilst delivering the service in the most efficient, effective and economic manner. COVID-19 has transformed service demand in certain areas and the services provided by the Council need to match the new pattern of demand.
Restructure	Savings which require changes to the staffing establishment
Reduction in provision	A number of savings where the level of provision will be reduced. Whilst as a matter of policy the Council aims to avoid cuts to frontline services, in order to balance the budget a number of small cuts to service provision have been proposed where the impact on service users will be minimal.
Procurement	Efficiency savings arising from securing better value for money and lower prices for contracts let by the Council without an adverse impact on service quality or the level of service provision.
Income generation	This saving largely relates to increased rents and parking charges at the Civic Centre to secure additional external income.
Digital	Better use of software and digital transformation will result in efficiency savings, whilst improving the customer experience.
Corporate items	This heading holds the £4.5m budget available to allow some savings in the headings above to be deferred into a future year.
Funding	
RSG	The 2023/24 RSG allocation of £29m has been calculated by uprating the 2022/23 amount by an indexation factor based on the September CPI inflation increase of 10.1%. It is anticipated that future years will be calculated in the same way. CPI inflation for September 2023 is currently estimated at 5.5% by the Office for Budget Responsibility.
Business Rates	The Government has frozen the business rates multiplier nationally, but has compensated local authorities for the loss of additional income via s31 grant based on the yield if the multiplier had increased by the September CPI rate of 10.1%. In previous years the RPI rate was used which was 12.6% in September 2022. The rating list has been revalued at April 2023. To keep the effect of the revaluation revenue neutral, the increase in the retained business rates share has been reduced to zero by reducing the amount of the top up thus keeping the Baseline Funding Level unchanged.
Council Tax	The increase in Council Tax income arises from a 3% increase in Council Tax and a 2% adult social care precept. This is the result of a 2% increased in the referendum threshold announced in the Autumn Statement. This is coupled with other changes, for example an increase in the tax base and reduction in the assumed collection rate.
Specific grants	The government has introduced some additional ringfenced funding for social care via new grants and increases to existing grants. The Services grant has been reduced to remove the NIC increase for the social care levy, which is no longer required and to redirect funding to supporting families. The lower tier services grant is now used as a funding guarantee, which no London Borough receives. Other grants are expected to increase by inflation.

SPECIFIC GRANTS	**2022/23**	**2023/24**	**Difference**
Specific Grants	£m	£m	£m
Improved Better Care Fund	13.3	13.3	0.0
Social Care Grant	13.7	22.3	8.6
ASC Market Sustainability and Improvement Fund	0.9	3.1	2.2
ASC Discharge Fund	-	1.9	1.9
Total Social Care Grants	**28.0**	**40.7**	**12.7**
Services Grant	6.1	3.4	- 2.7
Lower Tier Services Grant	0.9	-	- 0.9
Other Grants	26.6	27.3	0.7
Total Specific Grants	**61.5**	**71.4**	**9.9**

APPENDIX C (i)

SUMMARY OF BUDGET SAVINGS PROPOSALS 2023-24

Department	Reference	Project/Proposal	Category	Headline Description of Savings Proposal	2023/24 £000	2024/25 £000
Adult Social Care & Health	2023-24 AH01	Homecare Reductions	Service Transformation	Post Covid increases in homecare, driven by increased need and hospital discharge, introduce new reablement service and reduce double handed care packages to manage demand and increase independence	1,200	
Adult Social Care & Health	2023-24 AH02	Not in-sourcing Reablement	Service Transformation	Commission a reablement service through the market, which will deliver the same benefit for residents and for demand, but will cost substantially less to deliver than bringing the service in house	1,300	
Adult Social Care & Health	2023-24 AH03	Reduction in cost of Learning Disability Placements	Service Transformation	Proposal to support more people with a Learning Disability to live as independently as possible and to continue to reduce Residential Placements	600	
Adult Social Care & Health	2023-24 AH04	Extra Care Void Saving	Service Transformation	Reduce the number of care home placements, reversing the increase driven by health during Covid, re-focusing on extra care placements filling voids and new extra care schemes as alternatives that promote more independence	250	
Adult Social Care & Health	2023-24 AH05	Mental Health Placements	Service Transformation	Working closely with housing and secondary MH services to improve the recovery pathway post Covid, in particular reducing supported living placements and increased access to General Needs accommodation	470	
Adult Social Care & Health	2023-24 AH06	Reductions in Staffing	Restructure	Deliver the plan to increase the number of permanent staff in a very challenging recruitment market and reduce the Adult Social Care agency staffing	270	
Adult Social Care & Health	2023-24 AH07	Digital / Transformation Savings	Service Transformation	ASC - online forms, single view dashboards, integration of applications with Mosaic, assistive technology. Electronic document management. Direct payments automation and reduction in overpayments; and potential for increased alignment with CYP DP team. Automation of manual case review processes.	175	
Sub-total					**4,265**	**-**

Department	Reference	Project/Proposal	Category	Headline Description of Savings Proposal	2023/24 £000	2024/25 £000
Children & Young People	2023-24 CYP01	Early Help	Restructure	Savings proposals will be a combination of establishment savings achieved by deleting posts and reducing some commissioned services.	240	
Children & Young People	2023-24 CYP02	Inclusion and Virtual School	Reduction in provision	Reducing the Supporting Young People Contract, ('Connexions').	80	
Children & Young People	2023-24 CYP03	Localities - Care Packages reduction	Reduction in provision	Care package reductions for families receiving support from the 0-25 children and young people with disabilities teams	365	
Children & Young People	2023-24 CYP05	Looked after Children and Permanency	Restructure	Review of agency worker usage and implementation of a vacancy factor		510
Children & Young People	2023-24 CYP06	Forward Planning Performance & Partnerships	Procurement	Proposed savings will be made through the commissioning of placements for Looked After Children and Care Leavers		860
Children & Young People	2023-24 CYP07	Safeguarding and Quality Assurance	Restructure	Savings will be made through the management of vacant posts and a reduction of the CYP training budget.	121	
Children & Young People	2023-24 CYP08	Setting and School Effectiveness	Restructure	Proposed savings will be made by a reduction in staffing costs within the core school effectiveness team.	34	
Children & Young People	2023-24 CYP09	Digital / Transformation Savings	Service Transformation	Admin - case management, RPA, Mosaic enhancement (alerts), electronic document management, removing manual processes and excel. Schools admissions chatbots/virtual agents. Direct payments automation and reduction in overpayments; potential for increased alignment with ASC DP team. CAMS dashboard.		200
Sub-total					**840**	**1,570**

Department	Reference	Project/Proposal	Category	Headline Description of Savings Proposal	2023/24 £000	2024/25 £000
Communities & Regeneration	2023-24 CR01	Planning Service Staff	Restructure	Reduce planning staff by 5% (3.5 FTE) achieved by natural turnover/deletion of vacant posts. Would impact ability to provide planning service and policy framework.		205
Communities & Regeneration	2023-24 CR02	Brent Works / Brent Start	Restructure	Proposal to combine advisors across both Brent Start and Brent Works via turnover / vacancy management	35	
Communities & Regeneration	2023-24 CR03	Brent Start Programme Leader	Restructure	Proposal to merge a position with another programme to delete this provision in Brent Start via vacancy management	24	
Communities & Regeneration	2023-24 CR04	Regeneration Capitalisation	Restructure	Opportunity for further capitalisation for 4 years, whilst Wembley housing zone schemes are built		75
Communities & Regeneration	2023-24 CR05	Town Centre managers	Restructure	Reduction of one Town Centre manager.	68	
Communities & Regeneration	2023-24 CR06	Strategy & Engagement restructure	Restructure	Reduction in IAG Contract. Non appointment of new posts identified in the new structure	55	
Communities & Regeneration	2023-24 CR07	Communications restructure	Restructure	Reduce the cost of Communications by moving to a business partnering model	100	
Communities & Regeneration	2023-24 CR08	Digital / Transformation Savings	Service Transformation	Automation, chatbot, virtual agents. Dashboards for contract monitoring and demand management. Any changes to structures, alignment and commissioned services from Employment and Skills OBR. IoT e.g. potholes, better tech for field officers (Powerapps) to increase efficiency.	50	
Subtotal					**332**	**280**

Department	Reference	Project/Proposal	Category	Headline Description of Savings Proposal	2023/24 £000	2024/25 £000
Resident Services	2023-24 RS01	Removal of first class envelopes from the Civic Centre	Service Transformation	Removal of first class envelopes from Civic Centre to reduce postage spends. First class postage will remain available in the Post Room but only for those requiring first class postage	64	
Resident Services	2023-24 RS02	Staffing changes	Restructure	Staffing changes across the Improvement & Performance Team and the Digital Post Room teams. Duties to be covered by existing staff once re-evaluation of JD's and staff consultation has been carried out	86	
Resident Services	2023-24 RS03	IEG and Resilience contract reduction & Staffing reductions due to systems automation	Digital	Reduction in the usage of the Resilience contract and creation of in house applications to replace IEG	262	
Resident Services	2023-24 RS04	Online diary and reporting system and booking citizenship ceremonies	Digital	Online diary and reporting system equivalent to current product bought in house use of corporate. Online booking Citizenship ceremonies incorporating facility for payment for private ceremonies	11	
Resident Services	2023-24 RS05	Staff reorganisation	Restructure	Staff reorganisation in the Revenue & Debt team	210	
Resident Services	2023-24 RS06	Reduction in licensing, corporate printing, supplies and services, delivery of ICT roadmap, staffing	Digital	• Reduction in licensing spend through applications rationalisation • Reduction in corporate printing spend through continued move to digital options • Reduction in ICT and Transformation supplies and services spend • Reduction in Brent's contribution to the shared ICT service through realisation of savings through delivery of roadmap projects • Reduction in staffing in Transformation service	418	
Resident Services	2023-24 RS07	Digital / Transformation Savings	Service Transformation	Online forms, chatbot/virtual agent, RPA, further reduction in print, aligning systems	300	
Resident Services	2023-24 RS08	Libraries stock	Reduction in provision	Reduction in Libraries stock budget	62	
Resident Services	2023-24 RS09	Increase Council Owned Temporary Accommodation Portfolio	Service Transformation	Build a new Temporary Accommodation scheme of up to 100 units (similar to Anansi House), providing better quality and more affordable accommodation for people who would otherwise be in private sector nightly paid accommodation	350	
Resident Services	2023-24 RS11	Temporary Accommodation (TA)	Service Transformation	Increase portfolio of Council Managed Temporary Accommodation	86	
Resident Services	2023-24 RS12	Street Light Dimming	Reduction in provision	Proposal for Street Light Dimming. Identify areas where lighting levels can be reduced to secure energy cost savings	60	

Department	Reference	Project/Proposal	Category	Headline Description of Savings Proposal	2023/24 £000	2024/25 £000
Resident Services	2023-24 RS13	Waste disposal – Education and outreach insourcing	Service Transformation	Reduction in residual waste stream in order to secure increased recycling rates and reduced waste disposal payments to WLWA	250	
Resident Services	2023-24 RS14	Review Payments to WLWA	Service Transformation	This proposal seeks to recover any over-payment of waste disposal charges made by Brent that may be retained by WLWA and held as reserves by that organisation.	100	
Resident Services	2023-24 RS15	Increased use of Proceeds Of Crime Act	Restructure	Subsidise Regulatory Services area with use of POCA income	300	
Resident Services	2023-24 RS16	RLS related - Environmental Services Review	Restructure	Environmental Services review staff structures as part of RLS Phase 2 review	150	
Resident Services	2023-24 RS17	RLS related -Review of BTS	Service Transformation	Detailed service review, route optimisation and alternative means of transport	1,200	
Resident Services	2023-24 RS18	RLS Related - Negotiate RLS cost reduction	Procurement	Potential to reduce cost as part of RLS competitive dialogue tendering approach		200
Resident Services	2023-24 RS19	RLS related - Rationalisation of Environmental service budgets	Restructure	A rationalisation of the budgets within Environmental Services has taken place in anticipation of the savings required for the RLS project.	130	
Sub-total					**4,039**	**200**

Department	Reference	Project/Proposal	Category	Headline Description of Savings Proposal	2023/24 £000	2024/25 £000
Finance & Resources	2023-24 FR01	Reduction in staffing	Restructure	Savings will be made from the creation of a centralised Oracle support function in IT, a proportion of Head of Finance management oversight of master data and systems control is no longer required	252	
Finance & Resources	2023-24 FR02	Digital / Transformation Savings	Digital	Digital Transformation will enable automation of transactional activity across the whole of the Finance function and improvements in management self serve as a result of Oracle Cloud enhancements which will deliver savings	250	
Finance & Resources	2023-24 FR03	External support for Internal Audit activity	Procurement	Reduce use of external support to internal audit service	23	
Finance & Resources	2023-24 FR04	Civic Centre Office Let	Income Generation	Lease further floors of the Civic Centre to external organisations / tenants to generate revenue	-	680
Finance & Resources	2023-24 FR05	Increase car park/EVCP charge	Income Generation	Considered feasible to increase civic centre parking charge and also charging rate for EVCP provision without impacting demand.	100	
Finance & Resources	2023-24 FR06	Security Service Transformation	Service Transformation	Service transformation to be implemented following the detailed review of security provision across all Brent's operational buildings after staff TUPE'D across from the previous out-sourced provider in summer 2021	300	
Finance & Resources	2023-24 FR07	Rationalise soft FM service	Service Transformation	Rationalising soft FM services (cleaning) to meet reduced portfolio demand	150	
Finance & Resources	2023-24 FR08	Commercial Staffing Review	Restructure	Review capitalisation of staffing costs and replace interims with permanent staff	50	
Sub-total					**1,125**	**680**

Department	Reference	Project/Proposal	Category	Headline Description of Savings Proposal	2023/24 £000	2024/25 £000
Governance	2023-24 GOV01	Reduction in staffing via restructure	Restructure	Proposed savings to be made from reduction in posts and more efficient allocation of tasks	89	
Governance	2023-24 GOV02	Restructures in HR	Restructure	This saving would introduce a new model for advisory support in HR and reduce the number of advisory posts in HR by one in 2023/24 and by one in 2023/24.	85	
Governance	2023-24 GOV03	Reduce Corporate Learning and Development Budget	Reduction in provision	Reduction in budget held by HR for Corporate training	40	
Governance	2023-24 GOV04	Administrative and Miscellaneous Efficiencies	Service Transformation	Increased advert via Linkedin for recruitment advertising - reduction in publications	12	
Governance	2023-24 GOV05	Increase income target for recoverable legal work costs	Income generation	S106 and other third party income increase	30	
Governance	2023-24 GOV06	Reduce Legal Fees Budget	Service Transformation	Reduce the provision in the legal budget for payment of court fees and the costs of advice and representation by barristers in cases brought by or against the council	50	
Governance	2023-24 GOV07	Cessation of DX Postal service	Service Transformation	This savings would involve discontinuing use of the legal document exchange service through which documents for the court, barristers chambers and solicitors firms are currently sometimes despatched	3	
Governance	2023-24 GOV08	Miscellaneous expenses reduction	Service Transformation	Miscellaneous expenses reduction. This saving would remove a budget utilised for unplanned overhead expenses	19	
Governance	2023-24 GOV09	Administrative and Miscellaneous Efficiencies	Restructure	This proposal concerns aligning salary budgets with the establishment	22	
Governance	2023-24 GOV10	Procurement restructure	Restructure	Review structure of the Procurement team with overall impact leading to a reduction in the establishment by 1 FTE		50
Governance	2023-24 GOV11	Digital / Transformation Savings	Service Transformation	Electronic document management, further implementation of DocuSign, sharing documents with external parties via M365, chatbots for routine HR and Legal queries		75
Sub-total					**350**	**125**

Department	Reference	Project/Proposal	Category	Headline Description of Savings Proposal	2023/24 £000	2024/25 £000
Corporate	2023-24 CORP1	Digital / Transformation Savings	Service Transformation	Commissioning, Performance and Communications review	600	
Corporate	2023-24 CORP4	Procurement savings	Procurement	To be managed by the Commissioning and Procurement Board. All contracts on pipeline will come to the board to review contract specifications in order to deliver savings	449	51
Corporate	2023-24 CORP5	CMT Savings	Restructure	Savings from June 2022 CMT Restructure	200	
Corporate	2023-24 CORP6	RLS related - Environment department saving	Restructure	A rationalisation of the budgets within Environment has taken place in anticipation of the savings required for the RLS project.	1,300	
Corporate	2023-24 AH08	Technical Adjustment - recurring grant funding	Service Transformation	Recognition of grants not previously budgeted for in the MTFS.		1,500
Sub-total					**2,549**	**1,551**

Department	Reference	Project/Proposal	Category	Headline Description of Savings Proposal	2023/24 £000	2024/25 £000
SUMMARY OF SAVINGS PROPOSALS BY DIRECTORATE						
Adult Social Care & Health					4,265	-
Children & Young People					840	1,570
Communities & Regeneration					332	280
Resident Services					4,039	200
Finance & Resources					1,125	680
Governance					350	125
Corporate					2,549	1,551
Grand Total					**13,500**	**4,406**

EQUALITY ANALYSIS (EA) AH01, AH03 and AH04

POLICY/PROPOSAL:	Reviewing community-based Support Packages, residential and Nursing home placements to ensure they are commensurate with needs and always maximising independence. (AH01, AH03 and AH04)
DEPARTMENT:	Adult social care
TEAM:	Reablement, Review, Long term support & Occupational Therapist teams
LEAD OFFICER:	Claudia Brown
DATE:	29 December 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.

There is some evidence that Brent provides more homecare hours in community care packages than other London boroughs – potentially around 1 hour per week extra per client over the age of 75 than expected.

Under the Care Act 2014, all service users are to receive a proportionate review of their support funded by social care, annually. As a result, support packages/ placements can be adjusted accordingly. By undertaking some focus reviews, it will provide us with an opportunity to ensure support packages are commensurate to the needs of the individual.

This project proposes to be focussed on the areas where the data shows that we are outliers in providing care.

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

All Adult from the Age of 18

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.

ASC work with vulnerable client who require support as a result of their Physical, psychological and Mental frailty / disabilities. All clients receiving funded support from ASC are required to have an annual review. So, although this project will be undertaken as business as usual, there will be a closer focus on the area that we are outlier in our spending compared to other boroughs.

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

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

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

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

SECTION B – IMPACTS ANALYSIS

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

To achieve the saving as set out in the budget all current service users will be subjected to a review.

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

AGE	
Details of impacts identified	Not applicable.
DISABILITY	
Details of impacts identified	Not applicable. The review will relate to all service users who meet the Care Act criteria and are in receipt of a social care funded support package or a placement
RACE	
Details of impacts identified	Not applicable.
SEX	
Details of impacts identified	Not applicable.
SEXUAL ORIENTATION	

Details of impacts identified	Not applicable
PREGANCY AND MATERNITY	
Details of impacts identified	Not applicable.
RELIGION OR BELIEF	
Details of impacts identified	Not applicable.
GENDER REASSIGNMENT	
Details of impacts identified	Not applicable.
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	

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?

At each review the working group will engage with the individual and all parties involved in the support arrangements of the individual will be reviewed

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

None

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

- Service change can be perceived by individuals to be a negative change. Service users and their families may choose not to engage with this process. However, our social workers are experienced from previous work and will make all efforts to engage families and service users in the process before any changes are made. If the person does not have capacity and their family continues to dispute the assessed change, we have the option of approaching the court of protection to make a decision. However, this will be used as a last option as we are usually able to negotiate an agreed position.

- Staff will engage with providers as appropriate however, there is a risk of existing providers try to disrupt the move on process – this will be managed by the Commissioning Team, to work with providers to recognise the best interests of service users

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

All reviews are monitored by team manager and the project will feed into the Project and Transformation Board via a highlight report

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 project will be undertaken as business as usual and any impact for the focused areas will be monitored and reported to the Project and transformation board. Therefore, no adverse equality impact has been identified at this stage

SECTION D – RESULT

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

SECTION E - ACTION PLAN

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

Action	Expected outcome	Officer	Completion Date
Continue with reviewing all Service users receiving funded support from ASC annually as required by the care ACT	Support packages are adjusted as a result of the review/ reassessment if needed	Social workers, Occupational Therapist and Reviewing offices	April 2024

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Claudia Brown
REVIEWING OFFICER:	Andrew Davies, Head of Commissioning, Contracting and Market Management Tiffany Adonis-French Head of Complex Care Direct Services and Duty Sarah Richards Head of Intermediate care and Principal Occupational Therapist
HEAD OF SERVICE:	Claudia Brown Director ASC

Brent

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Savings will be made by a reduction in the contract value of the Supporting Young People Contract ('Connexions)
DEPARTMENT:	Children and Young People
TEAM:	Inclusion
LEAD OFFICER:	Sharon Buckby/Shirley Parks
DATE:	19 December 2022

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

SECTION A – INITIAL SCREENING

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

Savings will be made by a reduction in the contract value of the Supporting Young People Contract ('Connexions') by the value of £80K. The full impact will be mitigated by £40K of education funding (e.g., pupil premium funding) being allocated to the service to enable a dedicated advisor from the provider Prospects to be maintained within Brent Virtual School.

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

Young people who are at risk of being Not in Education, Employment or Training (NEET) may not get the same level of support as currently.

8. 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, as the contract supports outcomes for vulnerable children and young people.

9. 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	Impact Neutral/None	Impact Negative
Age			x
Sex		x	
Race			x
Disability *			x
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or maternity		x	
Marriage		x	

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

Screening Checklist

	YES	NO
Have you established that the policy or proposal *is* relevant to the council's public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?	x	
Would the policy or proposal change or remove services used by vulnerable groups of people?	x	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	

If you have answered YES to ANY of the above, then proceed to section B.
If you have answered NO to ALL of the above, then proceed straight to section D.

SECTION B – IMPACTS ANALYSIS

8. 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 Supporting Young People Contract is aimed at ensuring all young people are in education, employment and training. The number of young people in Brent who are NEET is low. However, those who are NEET are vulnerable young people, some have SEND and there is some disproportionality in the cohort.

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

AGE

Details of impacts identified	The service is for young people who are aged 16+, and a lower level of service could impact on outcomes into education, employment and training post-16.

DISABILITY

Details of impacts identified	There could be an impact on the timeliness of the progress into education, employment and training of young people with Special Education Needs and Disabilities (SEND) if the level of support is reduced.

RACE

Details of impacts identified	There could be an impact on the timeliness of the progress into education, employment and training of young people who are of different ethnic backgrounds, in particular of Black Caribbean or Black or Black mixed heritage, if the level of support is reduced.

SEX

Details of impacts identified	None

SEXUAL ORIENTATION

Details of impacts identified	None

PREGANCY AND MATERNITY

Details of impacts identified	N/A

RELIGION OR BELIEF

Details of impacts identified	N/A

GENDER REASSIGNMENT

Details of impacts identified	N/A

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	N/A

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

No

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

N/A

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

N/A

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

Mitigation measures will address any potential negative impacts.

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

The NEET data is monitored regularly and there is ongoing contract management which will be used to monitor impacts. There will be targeted approaches for the young people considered to be most at risk of being negatively impacted by reduced levels of support.

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.

Overall, the contract will continue to provide essential support to children and young people to ensure that they have positive journeys into adulthood.

A reduced service, however, could impact on the number of Brent young people who are in education, employment or training post-16 in relation to the most vulnerable groups. A number of mitigation measures will address these:

- The impact of the saving will be reduced by £40K being provided towards the contract through Brent Virtual School funds
- The contract will focus on vulnerable young people most at risk of being NEET to mitigate any negative impacts.
- Young people with SEND will be supported through improved 14 + transition planning at annual reviews of Education, Health and Care Plans led by schools to mitigate any impact.
- As a Council priority there is separate, targeted work underway through the Black Community Action Plan to support and motivate young people into education, employment and training and to provide access/exposure to employment opportunities that will mitigate the impact.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	**CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED**	**X**
B	**JUSTIFY AND CONTINUE THE POLICY/PROPOSAL**	
C	**CHANGE / ADJUST THE POLICY/PROPOSAL**	
D	**STOP OR ABANDON THE POLICY/PROPOSAL**	

SECTION E - ACTION PLAN

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

Action	Expected outcome	Officer	Completion Date
Continue to monitor the percentage of young people who are EET/NEET in vulnerable groups through regular contract monitoring.	There is no reduction in the number who are EET	Sharon Buckby	Ongoing

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Shirley Parks, OD Safeguarding Performance and Strategy
REVIEWING OFFICER:	Shirley Parks, OD Safeguarding Performance and Strategy
HEAD OF SERVICE / Operational Director:	Nigel Chapman, Corporate Director Children and Young People

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	**Reduction of one Practice Educator Role**
DEPARTMENT:	CYP – Safeguarding, Partnerships and Strategy
TEAM:	Quality Assurance and L&D
LEAD OFFICER:	Sonya Kalyniak
DATE:	19 December 2022

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

SECTION A – INITIAL SCREENING

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

Reduction of one Practice Educator post

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

There are 3 people in this role and 1 post would be reduced.

13. 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 equality and the council's public sector duty due to all three post-holders being female from ethnically diverse backgrounds from a variety of religions or beliefs.

14. 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	Impact Neutral/None	Impact Negative
Age		**X**	
Sex			**X**
Race			**X**

Disability *		**X**	
Sexual orientation		**X**	
Gender reassignment		**X**	
Religion or belief			**X**
Pregnancy or maternity		**X**	
Marriage		**X**	

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

Screening Checklist

	YES	NO
Have you established that the policy or proposal *is* relevant to the council's public sector equality duty?	**x**	
Does the policy or proposal relate to an area with known inequalities?		**x**
Would the policy or proposal change or remove services used by vulnerable groups of people?		**x**
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	**x**	

If you have answered YES to ANY of the above, then proceed to section B.
If you have answered NO to ALL of the above, then proceed straight to section D.

SECTION B – IMPACTS ANALYSIS

15. 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.

I have looked at the sex, religious and ethnic background of the three candidates.

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

AGE

Details of impacts identified	Not applicable

DISABILITY

Details of impacts identified	Not applicable

RACE

Details of impacts identified	All three employees in these posts are from ethnically diverse backgrounds.

SEX

Details of impacts identified	All three employees in these posts are female.

SEXUAL ORIENTATION

Details of impacts identified	Not applicable

PREGANCY AND MATERNITY

Details of impacts identified	Not applicable

RELIGION OR BELIEF

Details of impacts identified	All three employees in these posts have different religious backgrounds.

GENDER REASSIGNMENT

Details of impacts identified	Not applicable

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	Not applicable

17. Could any of the impacts you have identified be unlawful under the Equality Act 2010?
No

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

Yes

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

Careful consideration will be given to selecting the employees who remain in the post and the employee who will be moved to another area of CYP, in collaboration with post holders. There will be no redundancies from this proposal and every effort will be given to support one of these employees into a different social work qualified role with the same pay and conditions.

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

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

This will be measured through supervision (job satisfaction) and retention of all three employees.

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.

Although one employee with protected characteristics will move from the Practice Educator post to another social work qualified position with similar pay and conditions, this will be done with sensitivity and support. There will be no redundancies.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	**CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED**	**X**
B	**JUSTIFY AND CONTINUE THE POLICY/PROPOSAL**	

C	**CHANGE / ADJUST THE POLICY/PROPOSAL**	
D	**STOP OR ABANDON THE POLICY/PROPOSAL**	

SECTION E - ACTION PLAN

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

Action	Expected outcome	Officer	Completion Date
Determine a fair and transparent selection process for one employee to move to a different role.	One employee is selected and supported to move to a different role.	Nicole Levy	31/03/2023

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Shirley Parks, OD Safeguarding Performance and Strategy 19/12/2022
REVIEWING OFFICER:	Sonya Kalyniak
HEAD OF SERVICE / Operational Director:	Shirley Parks, OD Safeguarding Performance and Strategy

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Savings will be made by a reduction in staffing costs within the core school effectiveness team.
DEPARTMENT:	Children and Young People
TEAM:	Setting and School Effectiveness Service
LEAD OFFICER:	Shirley Parks/Jen Haskew
DATE:	12.12.22

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

SECTION A – INITIAL SCREENING

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

Savings will be made by a reduction in staffing costs within the core school effectiveness team.

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

There is a risk that pupil outcomes and school Ofsted inspection judgements could decline due to less capacity to fulfil core school improvement work.
However, this risk will be avoided by reducing staffing costs without reducing capacity within the core school improvement team.

18. 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.

No. The potential impact on young people will be protected by cutting staffing costs without reducing capacity within the core team.

19. 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	Impact Neutral/None	Impact Negative
Age		x	
Sex		x	
Race		x	
Disability *		x	
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or maternity		x	
Marriage		x	

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

Screening Checklist

	YES	NO
Have you established that the policy or proposal *is* relevant to the council's public sector equality duty?		x
Does the policy or proposal relate to an area with known inequalities?		x
Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative or positive equality impacts been identified with this policy or proposal?		x

If you have answered YES to ANY of the above, then proceed to section B.
If you have answered NO to ALL of the above, then proceed straight to section D.

SECTION B – IMPACTS ANALYSIS

22. 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.

23. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these

conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

AGE

Details of impacts identified	N/A

DISABILITY

Details of impacts identified	N/A

RACE

Details of impacts identified	N/A

SEX

Details of impacts identified	N/A

SEXUAL ORIENTATION

Details of impacts identified	N/A

PREGANCY AND MATERNITY

Details of impacts identified	N/A

RELIGION OR BELIEF

Details of impacts identified	N/A

GENDER REASSIGNMENT

Details of impacts identified	N/A

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	N/A

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

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

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

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

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

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.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	**CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED**	**X**
B	**JUSTIFY AND CONTINUE THE POLICY/PROPOSAL**	
C	**CHANGE / ADJUST THE POLICY/PROPOSAL**	
D	**STOP OR ABANDON THE POLICY/PROPOSAL**	

SECTION E - ACTION PLAN

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

Action	Expected outcome	Officer	Completion Date
Continue to monitor Ofsted outcomes	Quality of provision maintained	Jen Haskew	Ongoing

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Jen Haskew, Head of Setting and School Effectiveness (12.12.22)
REVIEWING OFFICER:	Jen Haskew, Head of Setting and School Effectiveness
HEAD OF SERVICE / Operational Director:	Shirley Parks, OD Safeguarding Performance and Strategy

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Service Transformation - RLS related - Detailed service review including route optimisation and alternative means of transport
DEPARTMENT:	Residents Services
TEAM:	Neighbourhood Management
LEAD OFFICER:	Chris Whyte
DATE:	1/12/2022

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

SECTION A – INITIAL SCREENING

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

The SEN passenger transport service is currently shared with LB Harrow who lead the service on behalf of both Authorities. Despite this, Brent BC is the larger 'client' for the service and it is estimated that costs per user for Brent are 30% higher than the cost for Harrow.

We know that there is opportunity for savings from benchmarking with other local authorities.

Edge Public Solutions has been appointed to carry out a review in order to inform savings options. Their first objective will be to effectively establish how well travel and transport services performs and identify cost reduction potential along with service quality and compliance improvement opportunities. They will then identify a program of change that will deliver successful implementation.

The expected efficiencies from the review are at least 10-15% of current expenditure (£1.2m - £1.8m) and are in line with efficiencies that Brent Public Solutions have identified for other local authorities.

We expect that the following key areas will provide the improvement opportunities

Strategy and policy

- Strategic and service planning for passenger transport; the fit with corporate priorities, legal requirements, and comparison to best practice.
- Culture and interaction with customers both internal and external, interaction with the Brent client team, SEN and ASC teams, parents, carers, and schools/daycentres.
- Policy improvement opportunities, eligibility and assessment practice and control

- Delivery strategy, possible alternative delivery models and options.
- Demand forecasts and management of this data for future years (including school rolls, impacts of demand management, and demographic projections).
- Opportunities to move from providing door to door transport to other travel solutions
- Opportunities to improve internal fleet and suppliers in terms of carbon emissions

Passenger transport management

- Operation structures, client management arrangements, processes, and financial control across all transport functions and processes including compliance with the Inter Authority Agreement between Brent BTS client team, Brent SEN & ASC, Brent NHS team and schools etc. including any gaps identified.
- Management capabilities and effectiveness
- Systems used and reporting functionality and effectiveness
- Accountability. Financial overview, management, control and reporting, financial trends, demand management. Including a review of the suitability of KPI's for financial and operational performance.
- Management skills and capability, including skills gaps across management, officers and front-line driver and PA's for both managed service internal routes and private hire providers.
- Performance management regime.
- Compliance regime in relation to vehicle and driver/escort provision and statutory compliance (e.g., S19, PATS, MIDAS etc.)
- Depot arrangements with Harrow, costs, flexibility, future strategy.
- Provision of internal fleet cost model and comparison with external supply
- Contract analysis and review
- Day to day management of safe-guarding, safety, training of providers, CCTV, and specialist equipment management.

Passenger transport co-ordination and demand control

- Routing and co-ordination methodology/ protocols/ opportunities
- Examination of approach to complex and exceptional travel requirement cases in terms of how they are managed, and decision made
- Suitability of service provision (routing logic, journey times, appropriateness of vehicles, relevant access requirements, route rationalisation potential etc.) and any alternatives.
- Balance of internal and external passenger transport provision
- Passenger transport procurement and options for improvement including contracts with private suppliers.
- Market supply analysis (market capacity, market engagement, strategic sourcing options, innovative ways to increase competition and drive best value)
- Focus on effective use of escorts, reduction in single person journeys and vehicle utilization improvement opportunities
- Opportunities for alternative travel arrangements including personal budgets
- Travel training and travel 'buddy' schemes to enable walking.
- Group pick up opportunities

22. Who may be affected by this policy or proposal?
Users of the Brent Passenger Transport Service: children with physical and/or learning disabilities and adults who use day centres. The families and careers of users of the service. Brent Passenger Transport staff and associated contractors School staff and day centre staff.

23. 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 The current passenger transport service is used to transport 1234 children and young people with special educational needs to school or college. These children have learning and/or physical disabilities. The service also transports 75 adult clients who are either elderly and / or have learning difficulties or physical disabilities. It transports them from home to day centres or other placements or activities, as defined within their personal care plans. The service is therefore currently mainly focused on younger and older age groups and therefore any change will disproportionately affect those groups. The nature of the impact will depend on the individuals and their disability. People with learning disabilities may find any change in transport drivers and escorts very unsettling.

24. 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	Impact Neutral/None	Impact Negative
Age			**x**
Sex		**x**	
Race		**x**	
Disability *			**x**
Sexual orientation		**x**	
Gender reassignment		**x**	
Religion or belief		**x**	
Pregnancy or maternity		**x**	
Marriage		**x**	

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

Screening Checklist

	YES	NO
Have you established that the policy or proposal *is* relevant to the council's public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?	x	
Would the policy or proposal change or remove services used by vulnerable groups of people?	x	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	

If you have answered YES to ANY of the above, then proceed to section B.
If you have answered NO to ALL of the above, then proceed straight to section D.

SECTION B – IMPACTS ANALYSIS

29. 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.

Information from Brent Transport Services, Adult Social Care and Children and Young People on the age, gender and disability of service users. Many of the users have high level physical and learning disabilities. Information provided through an in-depth analysis of the current service offer in terms of how it compares to other authorities and how it complies with government guidance and legislation. Further consultation and engagement work will take place with stakeholders to inform the service review that is underway.

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

AGE

Details of impacts identified	The passenger transport service will still be provided to its existing users, most of which are either children or older people. Any change that is identified as necessary by the review has the potential to very unsettling and disconcerting for a period of time

	for many users, especially those who may be anxious about changes to routine but should ultimately provide a better service. Consultation and engagement will take place with these stakeholders, including service users and families, to understand what they want from the service and on what the most important considerations are in terms of facilitating a mores seamless and less-unsettling transition.

DISABILITY

Details of impacts identified	The passenger transport service will still be provided to its existing users, most of whom have a disability. Consultation and engagement will take place with stakeholders, including service users and families, to understand what they want from any revised service and/or operating policies. This consultation will include an engagement programme that will identify the best means of ensuring the most seamless transition and of creating appropriate mitigations to remove stress and anxiety. It is considered most beneficial to undertake any change in full consultation with stakeholders, so their concerns are hard and accounted for.

RACE

Details of impacts identified	N/A

SEX

Details of impacts identified	N/A

SEXUAL ORIENTATION

Details of impacts identified	N/A

PREGANCY AND MATERNITY

Details of impacts identified	N/A

RELIGION OR BELIEF

Details of impacts identified	N/A

GENDER REASSIGNMENT

Details of impacts identified	N/A

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	N/A

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

No

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

The review of the service that is underway will include a full engagement and consultation exercise with service users. This review will help determine the extent of any operational changes and the revision of any policies that may be necessary and/or appropriate. It will be fully open to receiving concerns and representation from service users so these can be properly accounted for as part of any service redesign.

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

This will be established through the course of the review but are most likely to include issues that relate to re-routing, a change of pick up and drop of routines, or any change in the service personnel with whom the service users are used to coming into contact with. There will be a need to limit the level of change in relation to these issues to the fullest extent possible, or at last to fully communicate any change to users in the clearest and most helpful way possible.

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

The review is intended to identify policy and operating changes that will benefit passengers over the longer term. This will mean a settled and more effective service over a longer period in the future.

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

The revised services and the changed policies will be monitored by a newly created cross-council Transport Board. That governance will run parallel to the day-to-day operational

monitoring of the service and will include very regular dialogue with service users and their parents/guardians.

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.

This is intended to be a process of service review that will generate cost efficiencies alongside improvements and benefits for passengers.

In order to optimise the benefits, the following actions will apply –

- Through the Review, engage and consult fully with service users so that their views can inform the future service.
- Have an agreed transition phase to ensure a smooth move to any new service.
- Ensure that consistency with drivers and passenger attendants forms part of the outcome.
- Ensure compliance with government guidance, legislation and good practice by similar organisations elsewhere
- Promote, encourage and support the skills for independent travel.
- Engage with staff about the proposals, support them through the change process.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	**CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED**	
B	**JUSTIFY AND CONTINUE THE POLICY/PROPOSAL**	**X**
C	**CHANGE / ADJUST THE POLICY/PROPOSAL**	

D	**STOP OR ABANDON THE POLICY/PROPOSAL**	

SECTION E - ACTION PLAN

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

Action	Expected outcome	Officer	Completion Date
Service Review	Change operating procedures, policies, new governance, savings and efficiencies.	C Whyte	March 2024
Consultation/ engagement with stakeholders	All stakeholders aware of any proposed service change / policy changes.	C Whyte	March 2024
Transport Board established	New governance in place.	C Whyte	Dec 2023

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Simon Finney, Head of Neighbourhood Management
REVIEWING OFFICER:	Chris Whyte Director of Environment and Leisure
HEAD OF SERVICE / Operational Director:	Chris Whyte Director of Environment and Leisure

Brent

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	To increase Council Tax by 4.99% in 2023/24
DEPARTMENT:	Council wide
TEAM:	n/a
LEAD OFFICER:	n/a
DATE:	7 December 2022

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

SECTION A – INITIAL SCREENING

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

The council is required to make significant savings in order to deliver a legally required balanced budget. In order to help overcome this it is proposed to increase Council Tax by 4.99%, where 2% is ring fenced for Adult Social Care and 2.99% is a general increase. This is the maximum increase allowed by government. The proposal will generate an additional £7.0m of recurring income for the Council and therefore avoid having to make further savings to key council services such as adult social care, children's services, etc.

This will impact on all residents within Brent who are eligible to pay Council Tax. Under the changes that are being made to local government funding, there is more emphasis on generating more funding locally (i.e. becoming more self-determinant). This proposal is linked to one aspect of local government funding where the council has some discretion to raise additional funds by increases to Council Tax.

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

All households in Brent, apart from those eligible for 100% Council Tax discount.

The increase by band and the number of properties affected are shown below.

Band	Amount payable in 2022/23 (Brent share)	Amount payable in 2023/24 (Brent share)	Increase per annum	Increase per month	Increase per week	Total number of dwellings affected
A	£946.32	£993.54	£47.22	£3.94	£0.91	6,051
B	£1,104.04	£1,159.13	£55.09	£4.59	£1.06	13,850
C	£1,261.76	£1,324.72	£62.96	£5.25	£1.21	40,162
D	£1,419.48	£1,490.31	£70.83	£5.90	£1.36	38,709
E	£1,734.92	£1,821.49	£86.57	£7.21	£1.66	22,943
F	£2,050.36	£2,152.67	£102.31	£8.53	£1.97	6,477

G	£2,365.80	£2,483.85	£118.05	£9.84	£2.27	3,433
H	£2,838.96	£2,980.62	£141.66	£11.81	£2.72	250

If this proposal is approved it will affect all households in Brent's 131,875 residential dwellings, that will see their Council Tax bills increase, unless they are eligible for 100% Council Tax support. Currently, approximately 20% (26,300 households out of the 131,875) of households in Brent receive full or partial Council Tax support, which means that they will receive full or partial protection from the increase. In addition, those households where there is one eligible adult resident or less (38,612 households), a reduction of up to 50% on their bill will be due.

The Council Tax increase will mean that the budget of Adult Social Care services will grow by a further £2.8m which will enable the service to meet increasing demand of current and future service users, who are among the most vulnerable members of Brent's community. This is a positive impact.

28. 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. This proposal will have both positive and negative impacts on residents and will potentially hit groups with protected characteristics harder. However, since the council tax is applicable to all properties it is not considered that the increase targets any one particular group rather it is an increase that is applied across the board. At the same time because the increase is applied to all properties it is not possible to exempt any particular groups. However, on the latter point there is a council tax support scheme that offers support to vulnerable people and people on low incomes. In addition, the Brent Resident Support Fund (RSF) provides further assistance to vulnerable residents, including but not limited to help with the cost of their Council tax bill.

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

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

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

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

SECTION B – IMPACTS ANALYSIS

36. 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 council has analysed the statutory council tax base return which shows the total number of households that are required to pay council tax and the households who are eligible for council tax support.

Other than this is not possible to conduct further impact analyses as the proposed Council Tax increase will affect households in Brent in different ways based on their financial circumstances. However, low income households are likely to be protected as they will see increases in their Council Tax support which will either offset in full or partially this increase. The council tax support scheme is also proposed to be reviewed and further analysis on the cumulative impact will be assessed.

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

AGE	
Details of impacts identified	N/A
DISABILITY	
Details of impacts identified	N/A
RACE	
Details of impacts identified	N/A
SEX	

Details of impacts identified	N/A
SEXUAL ORIENTATION	
Details of impacts identified	N/A
PREGANCY AND MATERNITY	
Details of impacts identified	N/A
RELIGION OR BELIEF	
Details of impacts identified	N/A
GENDER REASSIGNMENT	
Details of impacts identified	N/A
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	N/A

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

No

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

Yes to both. Significant engagement / consultation is planned between December 2022 and February 2023 ahead of the decision being made by full council on 23 February 2023.

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

None required

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

If the proposal is rejected, the Adult Social Care budget will not grow by £2.8m, which could pose challenges to the service to meet growing demand of current and future service users. Failure to meet the increasing demand and diverse needs of current and future service users would have a l negative impact on those most at need. It will also likely lead to increased crisis costs and further impact upon budget pressures. The 2.99% increase in Council Tax for general use should have a positive impact on some equality groups as it prevents an additional reduction of £4.2m in the Council's budget. Without a specific alternative proposal, the exact benefit to specific groups of residents, staff and external stakeholders is uncertain, but a reduction in budget at short notice will limit the scope of the Council to reduce the impact on services used by vulnerable groups of people. While the Council Tax proposal will increase the financial pressure on some households, the Council Tax support scheme will partially or fully mitigate this impact for those households who are living on low incomes and are eligible for Council Tax support. Further, single households will have the impact mitigated by the 25% discount offered to single households.

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

If the Council Tax proposal is approved, the Council will continue to monitor the impact on equality groups to ensure that any unexpected consequences and/or adverse impact are promptly identified and mitigated. This will take place when the new council tax support scheme is implemented.

The existing powers under Section 13A of the Local Government Act 1992 allow the Council to reduce Council Tax by up to 100%. The process for applying is detailed on the Council's website.

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.

It is proposed to continue with the proposal. The reason for this is that the Council Tax increase will help to protect front line services, reduce the amount of savings required and provide much needed additional growth for the Adult Social Care budget. The Council Tax increase proposed is equivalent to approximately £7.0m of additional funding. If this funding was not available, services such as Adult Social Care and Children's Social Care would have to be significantly reduced. Brent has processes in place for applying a Council Tax support/reduction/exemption to those eligible, therefore whilst this increase will impact across the board, it is anticipated that the impact will be proportionate dependent on an individual's circumstances and whether they receive a Council Tax support/reduction/exemption.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

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

Action	Expected outcome	Officer	Completion Date
Review impact of council tax increase	Better understanding of negative impacts	Peter Cosgrove	April – June 2023

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Peter Cosgrove, Head of Revenues and Debt
REVIEWING OFFICER:	Ravinder Jassar, Deputy Director of Finance
OPERATIONAL DIRECTOR:	Thomas Cattermole, Director of Customer Access

Cumulative Equalities Assessment: Budget Proposals 2023/24

1 INTRODUCTION

The purpose of this equality assessment is to provide an analysis of the likely impact of the council's budget savings proposals on residents and community groups with 'protected characteristics' as defined by the Equality Act 2010. The nine protected characteristics are: age, disability, gender reassignment, marriage and civil partnership[1], race, religion or belief, sex and sexual orientation, pregnancy and maternity. Section 149, Public Sector Equality Duty (PSED) of the Equality Act 2010 requires the council in the exercise of its functions to have regard to the need to:

1. Eliminate discrimination, harassment, and victimisation and any other conduct prohibited under the act;
2. Advance equality of opportunity between persons who share a relevant protected characteristic and those who do not;
3. Foster good relations between persons who share a relevant protected characteristic and those who do not.

Whilst not a statutory requirement, it is our policy that where relevant an equality analysis should also cover socio-economic equality implications.

The council is committed to equality, diversity and inclusion. It seeks to ensure that all residents, employees and stakeholders are treated fairly and receive appropriate, accessible services and fair and equal opportunities. This commitment requires that equality considerations play a key role in our decision making processes; and in understanding the effect of our policies and practices.

Approach to considering equalities

The budget savings proposals have all been subject to an Equality Analysis (EA) screening, which helps to establish their relevance to the council's equalities duties and determine whether or not a full EA is required. The screening assesses the potential or likely impact on service users and employees with protected characteristics. Guidance issued to all officers on how to undertake an EA, provides that a full EA will not be required if it is clearly demonstrated that there will be no negative equality impacts. However, EAs are living documents

[1] Bullet point 2 and 3 does not apply to marriage and civil partnerships.

and if - as projects/proposals develop and further evidence of impacts becomes available – any unforeseen impacts emerge, they should be reviewed.

This document highlights the equality impacts for the 2023-24 budget proposals. Individual EA screenings for each proposal and full Equality Analyses are attached.

Nine proposals have been identified as requiring a full EA. The equality impacts concerned with these proposals are summarised in this report. The council must carefully consider and have regard to the impact of its savings proposals on the PSED; and take a reasonable and proportionate view regarding the overall impact and seek to mitigate impacts where possible.

Overall Assessment

No direct discrimination has been identified as a result of the budget proposals. A small proportion of the savings proposals may have a negative impact on equality of opportunity and may have a negative impact on opportunities to promote good relations, however measures have been identified to offset this.

These impacts will be kept under review. The proposed budget saving proposals are considered reasonable and have shown due regard to the PSED.

2 DEMOGRAPHY OVERVIEW

Key facts about Brent's demographic profile are taken from the data sources **Population change in Brent** and the **Equality profile of Brent.** They show the make-up of the borough, help us to identify potential impacts; and identify the increasing pressures and demand for council services. Please note that some of this information will be updated when final data sets are available from the Census 2021.

- Brent is home to around 335,300 residents and is the seventh largest borough in London.
- The borough has a population density of 7,652 people per square kilometre – the 14th highest density in England, and the highest in Outer London.
- Brent has high levels of population churn: in 2017-18, 32,600 people moved into the borough and 34,000 moved out – a turnover rate of 201 per 1000 population – 24th highest out of 317 areas in England, and second highest across Outer London.

- Brent's population increased by 27% between 1998-2018. In recent years, the borough's population change has been driven, primarily, by natural change (more births than deaths) as opposed to net migration. The birth rate has fallen over the year but remains well above the national average.

- Projections indicate that this pace of growth is set to continue: the population is expected to rise by a further 25% by 2041, faster than the London average (22%) and more than double the England average (10%). If realised, this would equate to an additional 84,800 residents by 2041.

- In line with national trends, the population is ageing: by 2041, the number of Brent residents aged 65 and over is projected to increase by 85% – an additional 34,900 older residents by 2041. The child population is also expected to grow, albeit more slowly, by 12% by 2041 (+8,600 children).

- Population growth will be concentrated in the areas where significant housing development is planned. The wards of Tokyngton and Alperton are expected to see the fastest growth: considered together, they are projected to accommodate an additional 47,600 residents by 2041.

A summary of the key protected characteristics in Brent are as follows:

Age

- Brent has a relatively young population. In 2018, the median age of the population was 35 in Brent, the same as in London, but five years lower than the national average (40 years, England). In Brent, 29% of the population is aged over 50 compared with 37% across England. Conversely, 39% of the borough's population is aged 25-49 compared with 33% in England. Brent has a higher proportion of children aged under ten compared with England (14% vs. 12%). The population has been ageing in recent years and this is expected to continue.

Disability

- Around one in seven Brent residents have a long-term health problem or disability that limits their day-to-day-activities in some way. The prevalence of disability rises sharply with age: more than half of all residents aged 65 and over had a long-term health problem or

disability.

Gender reassignment

- The Government Equalities Office tentatively estimates that around 0.3-0.8% of the UK population are transgender. In Brent, this would equate to between 1,000 to 2,500 people. Since the Gender Recognition Act came into force, only a small minority have obtained a Gender Recognition Certificate: 0.007% of the UK population (4,910 people across the UK since 2005).

Marriage and civil partnership

- In 2015, 960 marriages or civil partnerships took place in Brent – of these, 29 (3%) were same sex marriages or civil partnerships, the same as the percentage nationally but lower than the percentage in London (5%).

Pregnancy and maternity

- Brent has relatively high birth rates. In 2018, there were 4,705 births in Brent – which equates to 68.1 births per 1,000 women aged 15 to 44 – well above the national rate (59.2). Three quarters of all births in Brent were to women born outside the UK (75%) – this is the highest rate in England and Wales, reflecting the diversity of the borough's population.

Race

- Two thirds (67%) of the Brent population are from Black, Asian and minority ethnic groups. Brent's largest single ethnic group is the Indian population – who comprise 17% of residents – the fourth largest in London. Brent is the second most ethnically diverse borough in London, after Newham (according to the Simpson's Diversity Index).

Religion or belief

- The borough's three largest religious groups are Christian (41%), Muslim (19%) and Hindu (18%). Overall, 82% of residents had a religion – the fourth highest rate in England and Wales. The borough has the second largest Hindu population in England and Wales, and the 10th largest Muslim population (as a percentage of the population).

Sex

- The gender split in the population is 51% male and 49% female. The proportion of men is highest in the 20-34 age group where they comprise 54% of the population. In contrast, women make up a higher proportion of the Borough's elderly population: 62% of those aged 85 and over are female.

Sexual orientation

- Statistics about the size of the LGB population vary considerably and there is no single widely accepted measure. The 2017 GP Patient Survey found that 4.6% of Brent residents surveyed identified as Lesbian, Gay, Bisexual or 'Other' – below the London average (5.4%) but above the national rate (3.3%). Figures from the 2017 Annual Population Survey provide lower estimates for both London and England (3.2% and 2.6%).

3 IMPACT OF SAVING PROPOSALS

Summary 23/24 budget proposals

Although initial equality screenings have been undertaken to ascertain impact in terms of the Public Sector Equality Duty (PSED), some of the proposals are in their formative stages and still to be developed or are subject to consultations. Consequently, as the proposals are developed further equality analysis will be undertaken to assess the PSED. It is important to note that several of the proposals have identified no impact on the PSED. Where a full equality impact assessment has been carried out, this is noted next to the proposal.

The proposals are:

AH01: Homecare Reductions: Post Covid increases in homecare, driven by increased need and hospital discharge, introduce new reablement service and reduce double handed care packages to manage demand and increase independence.

AH02: Not in-sourcing Reablement: Commission a reablement service through the market, which will deliver the same benefit for residents and for demand but will cost substantially less to deliver than bringing the service in house

AH03: Reduction in cost of Learning Disability Placements: Proposal to support more people with a Learning Disability to live as independently as possible and to continue to reduce Residential Placements

AH04: Extra Care Void Saving: Reduce the number of care home placements, reversing the increase driven by health during Covid, re-focusing on extra care placements filling voids and new extra care schemes as alternatives that promote more independence

A full Equality Impact Assessment has been undertaken reviewing all levels of support highlighted in AH01 - AHO4

AH05: Mental Health Placements : Working closely with housing and secondary MH services to improve the recovery pathway post Covid, in particular reducing supported living placements and increased access to General Needs accommodation

AH06: Reductions in Staffing: Deliver the plan to increase the number of permanent staff in a very challenging recruitment market and reduce the Adult Social Care agency staffing

AH07: Digital / Transformation Savings - online forms, single view dashboards, integration of applications with Mosaic, assistive technology, electronic document management, Direct payments automation and reduction in overpayments; and potential for increased alignment with CYP DP team. Automation of manual case review processes

CYP01: Early Help: Savings proposals will be a combination of establishment savings achieved by deleting posts and reducing some commissioned services

CYP02: Inclusion and Virtual School: Reducing the Supporting Young People Contract, ('Connexions'). **A full Equality Impact Assessment has been undertaken**

CYP03: Localities - Care Packages reduction: Care package reductions for families receiving support from the 0-25 children and young people with disabilities teams. **A full Equality Impact Assessment has been undertaken**

CYP05: Looked after Children and Permanency: Review of agency worker usage and implementation of a vacancy factor. **A full Equality Impact Assessment has been undertaken**

CYP06: Forward Planning Performance & Partnerships: Proposed savings will be made through the commissioning of placements for Looked After Children and Care Leavers

CYP07: Safeguarding and Quality Assurance: Savings will be made through the management of vacant posts and a reduction of the CYP training budget. **A full Equality Impact Assessment has been undertaken**

CYP08: Setting and School Effectiveness: Proposed savings will be made by a reduction in staffing costs within the core school effectiveness team

CYP09: Digital / Transformation Savings: Admin - case management, RPA, Mosaic enhancement (alerts), electronic document management, removing manual processes and excel. Schools' admissions chatbots/virtual agents. Direct payments automation and reduction in overpayments; potential for increased alignment with ASC DP team. CAMS dashboard

CR01: Planning Service Staff: Reduce planning staff by 5% (3.5 FTE) achieved by natural turnover/deletion of vacant posts. Would impact ability to provide planning service and policy framework

CR02: Brent Works / Brent Start: Proposal to combine advisors across both Brent Start and Brent Works via turnover / vacancy management

CR03: Brent Start Programme Leader: Proposal to merge a position with another programme to delete this provision in Brent Start via vacancy management

CR04: Regeneration Capitalisation: Opportunity for further capitalisation for 4 years, whilst Wembley housing zone schemes are built

CR05: Town Centre managers: Reduction of one Town Centre manager

CR06: Strategy & Engagement restructure: Reduction in IAG Contract. Non appointment of new posts identified in the new structure

CR07: Communications restructure: Reduce the cost of Communications by moving to a business partnering model

CR08: Digital / Transformation Savings: Automation, chatbot, virtual agents. Dashboards for contract monitoring and demand management. Any changes to structures, alignment and commissioned services from Employment and Skills OBR. IoT e.g., potholes, better tech for field officers (Powerapps) to increase efficiency.

RS01: Removal of first class envelopes from the Civic Centre: Removal of first class envelopes from Civic Centre to reduce postage spends. First class postage will remain available in the Post Room but only for those requiring first class postage

RS02: Staffing changes: Staffing changes across the Improvement & Performance Team and the Digital Post Room teams. Duties to be covered by existing staff once re-evaluation of JD's and staff consultation has been carried out

RS03: IEG and Resilience contract reduction & Staffing reductions due to systems automation: Reduction in the usage of the Resilience contract and creation of in house applications to replace IEG

RS04: Online diary and reporting system and booking citizenship ceremonies: Online diary and reporting system equivalent to current product bought in house use of corporate. Online booking Citizenship ceremonies incorporating facility for payment for private ceremonies

RS05: Staff reorganisation: Staff reorganisation in the Revenue & Debt team

RS06: Reduction in licensing, corporate printing, supplies and services, delivery of ICT roadmap, staffing. Reduction in licensing spend through applications rationalisation; Reduction in corporate printing spend through continued move to digital options; Reduction in ICT and Transformation supplies and services spend; Reduction in Brent's contribution to the shared ICT service through realisation of savings through delivery of roadmap projects; Reduction in staffing in Transformation service

RS07: Digital / Transformation Savings: Online forms, chatbot/virtual agent, RPA, further reduction in print, aligning systems

RS08: Libraries stock: Reduction in Libraries stock budget

RS09: Increase Council Owned Temporary Accommodation Portfolio: Build a new Temporary Accommodation scheme of up to 100 units (similar to Anansi House), providing better quality and more affordable accommodation for people who would otherwise be in private sector nightly paid accommodation

RS11: Increase portfolio of Council Managed Temporary Accommodation (TA)

RS12: Street Light Dimming: Identify areas where lighting levels can be reduced to secure energy cost savings

RS13: Waste disposal – Education and outreach insourcing: Reduction in residual waste stream in order to secure increased recycling rates and reduced waste disposal payments to WLWA

RS14: Review Payments to WLWA: This proposal seeks to recover any over-payment of waste disposal charges made by Brent that may be retained by WLWA and held as reserves by that organisation.

RS15: Increased use of Proceeds Of Crime Act: Subsidise Regulatory Services area with use of POCA income

RS16: RLS related - Environmental Services Review: Environmental Services review staff structures as part of RLS Phase 2 review

RS17: RLS related Review of BTS: Detailed service review, route optimisation and alternative means of transport**. A full Equality Impact Assessment has been undertaken**

RS18: RLS Related - Negotiate RLS cost reduction: Potential to reduce cost as part of RLS competitive dialogue tendering approach

RS19: RLS related - Rationalisation of Environmental service budgets: A rationalisation of the budgets within Environmental Services has taken place in anticipation of the savings required for the RLS project.

FR01: Reduction in staffing: Savings will be made from the creation of a centralised Oracle support function in IT, a proportion of Head of Finance management oversight of master data and systems control is no longer required

FR02: Digital / Transformation Savings: Transformation will enable automation of transactional activity across the whole of the Finance function and improvements in management self-serve as a result of Oracle Cloud enhancements which will deliver savings

FR03: External support for Internal Audit activity: Reduce use of external support to internal audit service

FR04: Civic Centre Office Let: Lease further floors of the Civic Centre to external organisations / tenants to generate revenue

FR05: Increase car park/EVCP charge: Considered feasible to increase civic centre parking charge and also charging rate for EVCP provision without impacting demand.

FR06: Security Service Transformation: Service transformation to be implemented following the detailed review of security provision across all Brent's operational buildings after staff TUPE'D across from the previous out-sourced provider in summer 2021

FR07: Rationalise soft FM service: Rationalising soft FM services (cleaning) to meet reduced portfolio demand

FR08: Commercial Staffing Review: Review capitalisation of staffing costs and replace interims with permanent staff

GOV01: Reduction in staffing via restructure: Proposed savings to be made from reduction in posts and more efficient allocation of tasks

GOV02: Restructures in HR: This saving would introduce a new model for advisory support in HR and reduce the number of advisory posts in HR by one in 2023/24 and by one in 2023/24.

GOV03: Reduce Corporate Learning and Development Budget: Reduction in budget held by HR for Corporate training

GOV04: Administrative and Miscellaneous Efficiencies: Increased advert via LinkedIn for recruitment advertising - reduction in publications

GOV05: Increase income target for recoverable legal work costs: S106 and other third-party income increase

GOV06: Reduce Legal Fees Budget: Reduce the provision in the legal budget for payment of court fees and the costs of advice and representation by barristers in cases brought by or against the council

GOV07: Cessation of DX Postal service: This savings would involve discontinuing use of the legal document exchange service through which documents for the court, barrister's chambers and solicitor's firms are currently sometimes despatched

GOV08: Miscellaneous expenses reduction: Miscellaneous expenses reduction. This saving would remove a budget utilised for unplanned overhead expenses

GOV09: Administrative and Miscellaneous Efficiencies: This proposal concerns aligning salary budgets with the establishment

GOV10: Procurement restructure: Review structure of the Procurement team with overall impact leading to a reduction in the establishment by 1 FTE

GOV11: Digital / Transformation Savings: Electronic document management, further implementation of DocuSign, sharing documents with external parties via M365, chatbots for routine HR and Legal queries

CORP1: Digital / Transformation Savings: Commissioning, Performance and Communications review

CORP4: Procurement savings: To be managed by the Commissioning and Procurement Board. All contracts on pipeline will come to the board to review contract specifications in order to deliver savings

CORP5: CMT Savings: Savings from June 2022 CMT Restructure

CORP6: RLS related - Environment department saving; A rationalisation of the budgets within Environment has taken place in anticipation of the savings required for the RLS project.

Proposals requiring a full equality assessment

The proposed savings look to generate income for the council or have other positive impacts on service users. Few proposals were identified during the screening process as having an anticipated negative impact. Attached to this report are the supporting EA screenings for each savings proposal as well as the full Equality Analysis (the latter of which are summarised below).

AH01: Homecare Reductions; AH03: Reduction in Cost of Learning Disability Placements; AH04: Reduction in Care Home Placements

The proposal outlines a reduction in residential placements, where service users would be moved to supported living or extra care services, increasing independence and tailoring their care and support around their needs. This is in line with Brent's aim to use services that promote independence and choice within care and has formed a fundamental objective of the Brent Supported Living programme.

Initially, service users may experience some negative impact, due to the significant change in the type of care that they are provided as well as the level of care they are given, such as being introduced to different carers, being in a different location and a different way in.

Every change to a package of care is assessed for individually by a qualified professional, trained to understand legislation including the Care Act 2014 and the Equalities Act 2010. Protected characteristics are considered as part of an holistic assessment and if the practitioner is of the opinion that the client requires additional support to manage changes then they will ensure appropriate interventions are put in place to minimise the impact.

However, no negative impact is expected over the long term, as all reablement packages are subject to a personalised assessment of need before they are prescribed and any change to existing services will be subject to an assessment/review of the individual's needs. The service will also be monitored and evaluated regularly to ensure the efficiency of the service.

All moves are done working closely with the person and their family or advocate to live as independently as possible and to continue to reduce Residential Placements.

CYP02: Inclusion and Virtual School: Reducing the Supporting Young People Contract:

It is proposed that savings will be made by a reduction in the contract value of the Supporting Young People Contract ('Connexions') by the value of £80K. The full impact will be mitigated by £40K of education funding (e.g., pupil premium funding) being allocated to the service to enable a dedicated advisor from the provider Prospects to be maintained within Brent Virtual School.

Overall, the contract will continue to provide essential support to children and young people to ensure that they have positive journeys into adulthood.

However, a reduced service could impact on the number of young people who are in education, employment or training post-16 in relation to the most vulnerable groups. A number of mitigation measures will address these:

- The impact of the saving will be reduced by £40K being provided towards the contract through Brent Virtual School funds
- The contract will focus on vulnerable young people most at risk of being NEET to mitigate any negative impacts.
- Young people with SEND will be supported through improved 14+ transition planning at annual reviews of Education, Health and Care Plans led by schools to mitigate any impact.
- As a Council priority there is separate, targeted work underway through the Black Community Action Plan to support and motivate young people into education, employment and training and to provide access/exposure to employment opportunities that will mitigate the impact.

CYP03: Localities - Care Packages reduction: Care package reductions for families receiving support from the 0-25 children and young people with disabilities teams.

The proposal is to implement a Resource Allocation System (RAS) in the 0-25 service. This should provide a fairer and more consistent allocation of care packages for families and some current high cost packages are likely to be reduced. This will require a reassessment of the level of support being received by some families, both in terms of direct payments and care at home support. However, using this allocation scheme is likely to create a more consistent decision making in relation to the calculation of the size of care packages.

Potential negative impacts have been identified in relation to age and disability. It is likely that the proposal will impact on the level of support and payments being received with some families experiencing a reduction in the size of their care packages. This will be

because using the new assessment tool their assessment did not support the current level of care package. Work to explore how these impacts can be mitigated will be determined following the pilot.

A level of engagement has been undertaken with key stakeholders through the Brent Care Forum and before the RAS is implemented, a pilot scheme will run between December 2022 and February 2023 prior to full implementation in April 2023. This will help to identify any issues and concerns that arise. Furthermore, the number and type of challenges or complaints regarding care packages will be monitored and feedback from the Brent Parent Carer Forum will be sought to ensure that support is provided during the process and any feedback and suggestions are reviewed throughout implementation.

Equality analysis will continue to be conducted and reviewed, and any impacts monitored and mitigated against where applicable.

CYP05: Looked after Children and Permanency: Review of agency worker usage and implementation of a vacancy factor

The proposal sets out achieving savings through the management of vacant posts. This includes not recruiting to vacant posts in social work teams and realigning workload. An increase in vacant posts would require a redistribution of work to manage caseloads and redistribution of support for practice development.

Potential negative impact on age (under 25's provision) due to lack of resource over a period of time. The posts are being held vacant and work has been redistributed. This is possible in the short term, however, could have a much more significant impact if the roles were deleted permanently. This would affect the quality and consistency of social work practice for looked after children as the remaining service and team managers would be expected to undertake these tasks in addition to their existing job requirements over a longer period of time.

Staffing pressures could have the following impact:

- Less time and attention from allocated social workers due to higher caseloads

- Less capacity within teams for reflective practice which could impact on ability to understand, identify and respond to children and young people's needs, increasing pressures on existing resources which will impact the timeliness and quality of service to children, young people and families.

As highlighted above these concerns are only likely to arise if the roles were permanently deleted, mitigations will be put in place including monitoring and evaluation of the impact of the policy on caseloads and team functioning, mid-year review of the policy/proposals by HOS to ensure service is meeting statutory functions for all children and young people.

The Equality Assessment will be reviewed and updated as necessary to ensure any changes or impacts are monitored and evaluated on a regular basis.

CYP07: Safeguarding and Quality Assurance

Savings will be made through the management of vacant posts and a reduction of the CYP training budget. It is proposed that 4 social work posts will no longer be funded in the Locality Service. These savings will be achieved through the removal of funding for 2 social work posts in the AST team (Early Help service) and not recruiting to 2 vacant posts in the long term Locality social work teams. It is proposed that the 2 AST posts will be funded from other sources. The reduction of 2 posts in the Localities teams will lead to fewer case holding social workers and this will be managed by reallocating cases to other workers within the service.

This service provides support to children and their families up to the age of 18. It is young people in this age range who will be affected.

Staffing pressures could have the following impact:

- Less time and attention from allocated social workers due to higher caseloads
- Less capacity within teams for reflective practice which could impact on ability to understand, identify and respond to children and young people's needs.

The impacts of the reduction of posts will need to be carefully monitored and reviewed over time. The size of caseloads will need to be carefully tracked as will the quality and timeliness of the casework being completed. Detailed caseload analysis would need to take place before April 2023 in order to identify which teams could best cope with the loss of a social worker post.

RS17: Review of Brent Transport Service

It is proposed that a review of Transport Services is conducted in order to inform savings options. This will assist in establishing how well travel and transport services currently perform and identify cost reduction potential along with service quality and compliance

improvement opportunities. Areas that will be under review include users of the Brent Passenger Transport Service, children with physical and/or learning disabilities and adults who use day centres, families and careers of users of the service, Brent Passenger Transport staff and associated contractors and school staff and day centre staff.

Currently the service is mainly focused on younger and older age groups and therefore any change will disproportionately affect those groups. The nature of the impact will depend on the individuals and their disability. People with learning disabilities may find any change in transport drivers and escorts very unsettling.

The proposal is likely to have negative impacts in terms of the 'disability' and 'age' protected groups, as SEN children are likely to be affected by changes to individual routines, which can cause anxiety. Also, users may experience longer or additional travelling in order to access the service. Carers, whilst not protected themselves under the Equality Act 2010, are protected from indirect discrimination if they are caring for someone with a disability. Parent carers of SEN children may also be affected by outcomes of this proposal as their children would be affected.

Currently there are no impacts as the proposal is only to review the services. Equality analysis would continue to be conducted and reviewed, and any impacts monitored and mitigated against where applicable.

Increase in Council Tax by 4.99% in 2023/24

In order to deliver a legally required balanced budget, it is proposed to increase Council Tax by 4.99%, where 2% is ring fenced for Adult Social Care and 2.99% is a general increase. The proposal will generate an additional £7m of recurring income for the Council and therefore avoid having to make further savings to key council services such as adult social care and children's services.

This will impact on all residents within Brent who are eligible to pay Council Tax. The proposal will impact on all residents in the borough who are liable to pay Council Tax. As the increase has universal application, no one particular group with protected characteristics is targeted.

An increase in Council tax will impact on residents and potentially affect those from protected groups harder. However, for the most vulnerable residents, the Council Tax Support scheme will partially or fully mitigate this impact for those households who are living on low incomes and are eligible for Council Tax Support. Furthermore, single households will have the impact mitigated by the 25% discount offered to single households.

In addition, further staff training will be provided to equip officers with the awareness to identify where a discretionary payment may be appropriate, and how such requests should be assessed, and opportunities to improve equality monitoring data. Further mitigating actions are also available for residents and are highlighted in under the socio-economic implications section.

4 CUMULATIVE IMPACTS

Of the EAs that have indicated a negative impact, they have been related to the protected groups of disability and age. However, at this stage the impacts are considered to be short-term and part of a process that will eventually bring about improvements to the same.

5 SOCIO–ECONOMIC IMPLICATIONS

Certain groups within the population are more likely than others to live in a low income household. Low income is defined as living on household incomes below £20,000 per year, after tax and deductions (Brent Resident Attitude Survey 2018). In Brent, survey analysis shows that those living on lower incomes are more likely to be from Black ethnic groups; residents with a disability or long-term illness; older residents; those with no qualifications; those who are not in work; and those who live in social housing.

The proposal regarding increasing council tax has the potential to negatively impact on families and residents from lower socio-economic groups. This will be mitigated by early and accessible communication with residents affected, continuing to offer support for vulnerable residents, and more effective working with partners to ensure resources are used effectively.

The Council is aware of the cumulative impact of the cost of living crisis and the support that our residents and service users may require at this time. The following support has been made available:

Financial Support: households across Brent can access financial assistance through the following funds

- Resident Support Fund: this is available to Brent residents who are having difficulty due to unforeseen financial circumstances. Brent residents can apply for financial support, for up to £1000, to help with energy bills and other household expenditure

- Household Support Fund (HSF): The Government's HSF has been used to provide support to Brent households with the cost of food and fuel in the form of food vouchers, grants, and financial support to food aid organisations

- Discretionary Housing Payment: A one off payment can be provided to assist with rent shortfall, rent deposits and rent in advance if a Brent resident needs to move home

Certain eligibility criteria need to be met to access financial support.

Support and Advice: Brent hubs can provide support and advice to Brent residents who are struggling to pay their utility bills this winter. This can include assistance with completing funding applications for support from local and national schemes, including the Brent Resident Support Fund, referral routes to other advisory agencies who specialise in energy support such as Green Doctors and SHINE, referral routes to food banks and emergency supermarket vouchers and urgent support with topping up pre-payment gas and electricity meters

Food Aid and Vouchers: Supporting the families / carers of approximately 12,000 eligible children and young people with supermarket vouchers during each of the school holidays since December 2020.

Some of the proposals outlined in the report will be mitigated by early and accessible communication with residents affected, continuing to offer support for vulnerable residents, for example through the Brent Hubs and digital assistance, and more effective working with partners to ensure resources are used effectively.

6 STAFFING IMPLICATIONS

Of the budget proposals that were subject to an equality screening, several have staffing implications arising from staff restructures or service redesign. Where there are staffing implications for a third party, the council will work with the third party organisation to ensure that the equality implications are understood, and appropriate steps taken to minimise any adverse impacts.

To mitigate against compulsory staff redundancies, a number of the proposals will achieve a reduction through giving up vacant posts or through natural turnover. In these cases, it is considered that there will be no impact on characteristic groups.

Whenever the council is required to undertake compulsory redundancies, full EAs will be undertaken as part of the consultation process. For proposals that include a reduction in the number of posts and redundancy implications, a meaningful assessment on the equality impact is not possible at this stage as no individuals (and therefore protected characteristics) have been identified for assessment. Equality Analyses in these cases will be carried out closer to the time of the start of the restructure.

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Budget Scrutiny Task Group Findings Report

Scrutiny of the Draft Budget Proposals for 2023/24

24 January 2023

Brent

Foreward

Austerity policies since 2010 have created financial insecurity for Brent residents. The Budget Scrutiny Task Group's role has been to assess the impact of the Council's draft budget proposals for 2023/24. This is in response to another year of significant cuts to local government funding. Despite this, the Council has put forward a Budget which recognises the reality of the lives of our residents. For instance, the Council choosing not to cut Home Care visits to 15 minutes, unlike many other boroughs; Investing in Council-owned temporary accommodation to improve housing standards for those who are homeless or threatened with homelessness; and keeping Brent's libraries open. There is no doubt though that the impact of 12 years of cumulative public sector and local authority cuts will continue to be felt by all residents in Brent. Residents deserve a budget driven by their needs, not austerity budgets driven by funding cuts.

I would like to thank our local stakeholders and community organisations who contributed to this report, and to the other members of the Task Group for their commitment and thoughtful challenges to the budget within a compressed timetable. The thanks of the Task Group also goes to the scrutiny officers for their support throughout the budget scrutiny process.

Councillor Rita Conneely
Chair – Resources and Public Realm Scrutiny Committee

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Members of the Budget Scrutiny Task Group

The Budget Scrutiny Task Group was a joint effort between the Council's two scrutiny committees, with equal representation from the Resources and Public Realm Committee and the Community and Wellbeing Committee. The Task Group comprised of the following representatives:

Councillor Rita Conneely – Chair

Councillor Ketan Sheth – Vice-Chair

Councillor Tom Miller

Councillor Hannah Matin

Councillor Jayanti Patel

Councillor Diane Collymore

Terms of Reference

The following terms of reference were agreed at the Resources and Public Realm Scrutiny Committee on 6 September 2022:

- To consider the Cabinet's budget proposals for 2023-24.
- To receive evidence from Cabinet Members, senior departmental officers, and any other relevant stakeholders to help inform and shape any comments and recommendations.
- To agree a draft report that comments on the budget proposals for submission to the Resources and Public Realm Scrutiny Committee for subsequent ratification and submission to Cabinet.

1. Introduction

Context

1.1. In July 2022, Brent Council agreed its revised Medium Term Financial Strategy (MTFS), outlining the financial framework for the financial years 2023/24 to 2024/2025. The programme developed through a combination of effective financial management, cost control, scenario modelling and more innovative approaches to investment and demand management, forecasted a two-year savings target of £28m of which £18m has been identified for the financial year 2023/24, and £12m for 2024/25. At the time the MTFS was agreed, it was noted that the Council was already operating in a significantly challenging financial environment having made £196m worth of cumulative cuts to its budget since 2010. The financial pressures have been exacerbated by unexpected factors such as the global implications from war in Ukraine, high levels of inflation and rising interest rates, presenting the Authority with an uncertain economic environment to navigate.

1.2. The Council published its Draft Budget for 2023/24 in November 2022, setting out a series of budget proposals totalling £18m. It is important to note that since the proposals have been published, the provisional Local Government Finance Settlement for 2023/24 was released on 21 December 2022. Overall, it is understood that the provisional settlement provides additional resources above the level forecast in the November Budget report. Whilst the settlement provided additional funding that was not forecast in the MTFS, additional pressures have emerged since the MTFS was last presented to members.

1.3. The final budget position of the Council will not be known until the final proposals are published for the Cabinet Meeting in February 2023. The Task Group have been assured that any additional monies from the Settlement will be used to fund new budget pressures that have been identified, such as pressures in Children's Social Care and rising energy costs. Additionally, this will enable the Council to spread a portion of the savings identified for financial year 2023/24 over the next two financial years to lessen the impacts of the proposals on our residents.

1.4. The Task Group's findings are therefore based on the assumptions set out as part of the Draft Budget 2023/24.

1.5. Additionally, the Draft Budget proposed to increase Council Tax by 2.99% (consisting of a 1.99% general increase plus 1% for the Adult Social Care Precept). Again it is important to note that since the proposals were published, the Chancellor's Autumn Statement has increased the maximum amount local authorities can raise Council Tax, from 2.99% to 4.99% (consisting of a 2.99% general increase plus 2% for the Adult Social Care Precept) without needing a referendum. The Council is currently considering this and are likely to adopt the new maximum increase, following the consultation that is currently underway.

Role of Task Group

1.6. Brent's decision-making framework gives a clear and important role to Overview and Scrutiny in its budget-setting. The process for developing proposals for the budget and capital programme is outlined in the Brent Council Constitution, Part 2, Standing Order 19. This requires that the Cabinet's budget proposals be considered by the Council's Resources and Public Realm Scrutiny Committee. After it has scrutinised the proposals, the Committee will then submit a note of its deliberations and comments on the proposals to the Cabinet.

1.7. The Resources and Public Realm Scrutiny Committee agreed to scrutinise the draft budget proposals for 2023/24 through a Budget Scrutiny Task Group. This was established at the committee meeting on 6 September 2022.[1]

1.8. The panel held a series of meetings between October and December 2022 to prepare this report. This included closed meetings that discussed the Task Group's own findings, ideas, and recommendations, and evidence sessions with the Cabinet, Corporate Management Team, and our valued partners. We also presented questions and scrutinised the proposals in detail. The full list of participants is provided at the end of this report.

1.9. For the purposes outlined in the Constitution this report will be considered and agreed by the Resources and Public Realm Scrutiny Committee on Tuesday 24 January 2023. A report from the Committee will then be presented to Cabinet for consideration in February 2023, alongside the report from the Corporate Director of Finance and Resources on the final budget proposals for 2023/24.

1.10. The Task Group seeks to act as a 'critical friend'. Therefore, it is hoped this report will spark constructive debate on the proposals, and more widely on how Brent sets its budget in alignment with the democratically agreed strategic priorities of the Council.

1.11. Residents, businesses, partners and communities need us more than ever as we all navigate the Cost of Living crisis. We can strive to provide support and continue to improve the way we deliver services by adopting a robust and creative budget built on income generation and investing in our voluntary and community sector that prioritises protecting our most vulnerable residents.

1.12. This report summarises our investigations and conclusions. We would welcome the Cabinet's decision to take our recommendations on the proposed budget for 2023/24 forward.

2. Recommendations

2.1 The Budget Scrutiny Task Group makes the following recommendations to Cabinet.

Recommendation 1- Borough Plan 2023-27 Alignment

It is important that the proposed budget properly aligns with the strategic priorities identified in the upcoming Borough Plan 2023-27. The Task Group are concerned that the draft budget omits solid proposals to deliver on our strategic priorities around our climate commitments, including our goal to become Carbon Net Zero by 2030. There is a real opportunity for the Council to clearly communicate the relationship between its strategic priorities and budget proposals to residents, local councillors, and partners. The Council should strive to publish both the Budget and Borough Plan at the same time but the Task Group has noted that this has been challenging on this occasion due to time restraints and budget uncertainties. **The Task Group recommend that the Council more clearly demonstrates how public money is being spent in line with the democratically agreed strategic priorities for the borough.**

Recommendation 2 – Proposal Categorisations

The Task Group are concerned with how the draft budget proposals were being presented to residents. It was noted that using language such as 'savings' in past budget setting processes may have been acceptable; however, on this occasion this is not applicable due to the great amount that needs to be cut from the budget moving forward. Given that the Council has to continue to deliver savings over the next two years to balance the budget, there is a greater need for resident's expectations to be managed correctly and honestly to ensure that they are prepared for the difficult changes to important services. **The Task Group recommend that each budget proposal is categorised as one of: Cut; Income generation;**

[1] https://democracy.brent.gov.uk/documents/s124625/06.%20Establishment%20of%20Budget%20Task%20Group.pdf

Service transformation; Efficiency; or Investment for transparency purposes. This language should also be used in Council communications in order for residents to distinguish between the proposals which are cuts/service reductions, those which are investments, and those which are efficiencies/service transformation.

Recommendation 3 – Income Generation

The Task Group welcome and are encouraged by the Council's efforts to identify options for income generation. We would encourage officers to continue being innovative in identifying further opportunities for income generation to offset the impact that many of the proposals will have on vital council services. Specifically, around increasing parking fees/charges and generating income from our assets, such as parks. With regards to the former, we note the Chief Executive's comments around ensuring that if we are able to increase parking fees/charges, that the messaging to residents would have to be very clear in specifying that any charges recouped from parking fees would be reinvested in highways infrastructure as is legally required. However, any fee/charge increases must adopt a balanced approach that accounts for the impact of the Cost of Living crisis on different communities. We would also like to stress that utilising our parks to generate income could assist us in our legacy work as 'Borough of Culture 2020'. **The Task Group recommend that the Council:**

- **Increase parking fees/charges to a more comparable rate charged by surrounding boroughs to secure safe movement of traffic and adequate parking and;**
- **Utilise our parks to generate additional income – as part of this process, the Council should draw comparisons with other local authorities to learn from good practice.**

Recommendation 4 – Additional Financial Support for Residents

The Task Group note the Chancellor's Autumn Statement, which gives provision for local authorities to raise Council Tax by a maximum of 4.99% without a referendum. We appreciate the Council is likely to have no other viable options but to raise Council Tax by this amount to navigate the current financial challenges. However, Council Tax is a regressive tax; should this increase happen, the Task Group is concerned that this may cause greater hardship to those residents who currently do not qualify for relief under the Council Tax Support Scheme or Resident Support Fund. Additionally, the Task Group are concerned that in response to tax increases, along with rising energy costs and unaffordable rents, it is frequently only food which is left for residents and families to sacrifice. **The Task Group therefore recommend that the Council:**

- **Increases funding and reviews the eligibility criteria for both the Council Tax Support scheme and the Resident Support Fund, should the financial modelling process allow and;**
- **Explores options to provide additional support to children to tackle food poverty, such as extending universal free school meals provision.**

Recommendation 5 – Additional Advice & Support for our Voluntary Sector partners

It is clear that our voluntary sector partners are also experiencing significant financial difficulty and, like the Council, have been subject to consistent budget reductions over the last 10 years. The voluntary sector provide vital support for many residents and act as a safety net for the Council by going above and beyond to offer services that are beyond their traditional remit (e.g. food aid). The Task Group are satisfied that the Council is doing the best it can to protect the voluntary sector and frontline services in its proposed budget. However, it is likely that in the future funding to the voluntary sector could be scaled back. It is important we provide the voluntary sector with its own safety net. **To assist in building voluntary sector resilience, the Task Group recommend that the Council develops:**

- **An approach to increase the value of the commissioned contracts offered to the VCS to help them navigate the current volatile economic environment. The Council could also use this as an opportunity to tighten and improve its contract monitoring process to ensure further robustness and transparency in achieving outcomes.**
- **A collaborative strategy with the VCS to enable these organisations to identify and secure new income streams. This should also include scope for increased opportunities to make joint bids for grant funding.**

- **A transparent policy for distributing Council community assets to our voluntary partners in need of space. Specifically, offering capped peppercorn rents to the sector to expand their operations.**

Recommendation 6 – Equal Access for All Residents

The Task Group understands the importance of the Council taking advantage of the opportunities/benefits associated with digital transformation, especially when taking into consideration the possible savings and efficiencies they can provide. However, we are still mindful that not all automated services are fit for purpose nor accessible to all residents (e.g. those who are digitally excluded, those with disabilities etc.) **The Task Group recommend that:**

- **The proposed automated services (e.g. chat bots) are tested by residents ahead of implementation, especially by those who have accessibility needs to ensure that all residents have equal access to services and;**
- **Additional advice and support is provided to disabled residents and those cohorts of residents with other access needs (e.g. literacy needs/English not a first language etc.) to navigate digital-form filling so they can maximise the benefits/grants they are eligible for and entitled to.**

Recommendation 7 – Improving Equality Impact Assessments (EIAs)

The Task Group noted that the Council has undertaken individual equality impact assessments (EIA) on each proposal, but improvements could be made to the current process to ensure greater transparency so EIAs are not seen as a 'tick box' exercise. **The Task Group recommend that the Council:**

- **Include an evidence base/rationale section in the EIA for each proposal where it has been deemed that there are no potential or likely impact on service users and employees with protected characteristics (e.g. how the Council arrived at such decisions) and;**
- **Undertake a cumulative equality impact assessment of the budget decisions since 2018 to understand fully the medium and long-term impacts of its financial decisions. It is recommended a cumulative EqIA is completed during financial year 2023/24 and is included in the final budget report 2024/25.**

Recommendation 8- Increased Collaboration

The Task Group is not clear on how health partners will be involved in the decision-making around in agreeing step down plans into general needs accommodation (proposal AH05). This partnership is vital to ensure our most vulnerable residents have the appropriate support in place at the right time, especially considering the difficulties in recruiting and retaining high quality staff. More generally this proposal raises interest from the Task Group regarding how we can work better with the NHS and other stakeholders around hospital discharges e.g. how we collectively mitigate the risks around discharge, and how we leverage contributions from partners/agencies in providing high quality social care and support. At present we have concerns that the rising costs in Adult Social Care cannot be met by the Council alone, where there is a need for clarity on the NHS funding responsibilities. **To ensure a holistic approach to residents' care, specifically 'those with complex needs', the Task Group recommend that:**

- **A collaborative mechanism is established between the Council, NHS, and other relevant stakeholders to agree discharges/step down plans. If possible, this should be considered as part of the review process currently taking place with Central and North West London NHS Foundation Trust (CNWL) in the Integrated Care Partnership and;**
- **The Council leverage sufficient financial contributions from the NHS (and other relevant anchor institutions) to improve the Health & Social Care function in Brent.**

Recommendation 9 – Lobbying

We note that many of the challenges in the draft budget proposals are reliant on the powers and funding from central government to be resolved. **The Task Group therefore recommend that the Council works closely with neighbouring local authorities, London Councils, and the Local Government Association (LGA) to seek:**

- **Additional funding in the Dedicated Schools Grant (DSG), notably the High Needs Block of the DSG which is currently in deficit. Although the Task Group is pleased with the activity**

undertaken to manage the deficit and despite the fact that the Council will see increased funding from central government, there is still a need for additional financial support to meet rising demand.

- **Powers to levy proportionate charges on parked motorcycles/mopeds. If successful, this would enable the Council to expand the parking permit system in the borough to include other forms of vehicles.**
- **Local Government funding reform, including reform of regressive taxes such as Council Tax.**
- **Changes to gambling legislation and regulations that enable local authorities to generate additional income from gambling licensing fees. This money could then be used to reinvest in vital Council services.**
- **The introduction of 'Short Term Letting' legislation that will allow local authorities to establish licensing schemes for 'Air B&B' accommodation in their respective boroughs. This would enable the Council to generate additional income from 'Air B&B' businesses in Brent that could then be reinvested back into services for the benefit of residents.**

Recommendation 10- Phased Reduction to Care Packages Provision

In relation to proposal CYP03, the Task Group note that the Children and Young People department has identified discrepancies between care packages and the need for clarity and consistency in regards to the eligibility criteria and presenting needs when determining the level of support to be provided. The Task Group supports the review of care packages and better aligning resources to the evidenced needs of children; however we still have concerns about the impact this proposal could have on disabled children in the borough as a whole if the cut to overall provision is made over one financial year. **The Task Group recommend that a proportion of the additional funding from the Local Government Finance Settlement is used to enable the Council to defer a proportion of the savings in this proposal to financial year 24/25. This is to ensure changes in provision are implemented in a phased way.**

Recommendation 11- Review Areas of Focus for Town Centre Management Function

The Task Group believe the current town centre management infrastructure has made great strides in revitalising our town centres and supporting our businesses. This has been essential post-covid and in the current economic climate. We felt assured that proposal CR05 would not impact service delivery, however we believe this proposal presents an opportunity for the Council to rethink its town centre management structure to ensure more effective focus on economically deprived areas. **The Task Group recommend reviewing the areas of focus for the town centre management function, whereby resource can be balanced against need; and work duplication prevented.**

Recommendation 12 – Mitigating the impact of reducing the library stock budget

Although proposal RS08 is likely to have a small impact in the context of the collective budget proposals, the Task Group has concerns with the potential impact that this specific proposal could have on Brent's most vulnerable residents, and in particular children. **The Task Group recommend that the Council explores external options to leverage additional resources for our most vulnerable residents, such as the promotion of schemes (e.g. Letterbox Club run by BookTrust) offering free books to vulnerable and disadvantaged children. This could help offset the impact of the proposal on disadvantaged residents and children; and could assist with ensuring children in Brent have equal access to a broad range of reading material.**

Recommendation 13 – Mitigating the impact of reducing the Corporate Learning and Training budget

The Task Group recommend that the Council be guided by staff satisfaction surveys when deciding what training courses to discontinue as part of the reduction to the Corporate Learning and Training budget (GOV03).

3. Evidence Sessions

3.1. The Budget Scrutiny Task Group held a series of evidence sessions with Cabinet Members, the Corporate Management Team, and partners to review the suitability of the 2023/24 budget proposals and to inform its recommendations.

3.2. As part of this process, council officers provided the following reports for consideration:

- Q2 Financial Report 2022/23
- Medium Term Financial Strategy (MTFS)
- Draft Budget 2023/24 (inclusive of the revised MTFS, budget assumptions, scenario modelling, and draft budget proposals)

Work Planning Sessions

3.3. The work planning meetings were held on 25 October and 31 October 2022.

3.4. Key witnesses included the Deputy Leader, the Corporate Director of Finance & Resources, and the Deputy Director of Finance.

3.5. At the initial session the Task Group heard from the Deputy Leader and senior finance officers on the Council's latest overall financial position, the Medium Term Financial Outlook, the Council's financial pressures/mitigations, emerging budget assumptions and its budget setting strategy for 2023/24 (Q2 Financial Report and Medium Term Financial Outlook).

3.6. During work planning, Task Group members discussed and agreed the approach to be taken to scrutinise the Draft Budget 2023/24. This consisted of:

- A focus group with key voluntary and community sector partners to analyse the budget proposals and temperature check the impact and assumptions that sit behind them.
- An evidence session to review the updated Medium Term Financial Outlook, proposed consultation/engagement plan and the budget proposals put forward for the following directorates: Children and Young People, Communities & Regeneration, Governance, and Finance & Resources.
- An evidence session on the remaining proposals for Adult Social Care & Health and Residents Services
- A final evidence session to hear any additional evidence and to agree the draft recommendations and conclusions

3.7. There were a number of specific areas that the Task Group agreed to review in depth, specifically:

- **Brent Council's overall financial position**
- Brent Council's **MTFS**, and the proposed budget setting strategy for 2023/24 (including budget assumptions).
- Draft Budget 2023/24 consultation
- **The impact of the COVID19** on Brent Council's budget pressures and performance
- **The impact of the Cost of Living Crisis** on Brent Council's budget pressures and performance.
- **The impact of inflation** on Brent Council's budget pressures and performance
- The Council's key departmental **overspends and underspends**
- The main areas for expenditure pressure by department and spending assumptions in the Budget for 2023/24.
- The profile of Budget risks for 2022/2023 and 2023/24
- **The impact of budget proposals 2023/24** on service delivery
- The main **income** streams for 2022/2023; including income generation strategy and targets.
- The **Capital Budget** of the Council

- The Council's **Housing Revenue Account**
- The level of **reserves** for 2022-23 and projected for 2023-24

3.8. The Cabinet, Corporate Management Team and Statutory Scrutiny Officer were sighted on the scope and content of the budget scrutiny project plan.

Evidence Session 1

3.9. Evidence session 1 was held on 17 November 2022.

3.10. Key attendees included the Deputy Leader, the Cabinet Members for Community Engagement, Equalities, and Culture; Children, Young People, and Schools; Regeneration and Planning, Jobs, Economy & Citizen Experience; the Chief Executive, and the Corporate Director for Finance & Resources.

3.11. The session focused on several topics including:
- The Council's renewed MTFS
- Updated income and expenditure budget assumptions
- Risk, issues and uncertainties faced by the Council e.g. Cost of Living Crisis and rising inflation etc.
- Reserves strategy

3.12. The Task Group undertook a deep dive exercise into the draft budget proposals for the directorates below:
- Children & Young People
- Communities & Regeneration
- Governance
- Finance & Resources

3.13. The exercise entailed interrogating the impact of these proposals on residents, analysing the accuracy of the relevant equality impact assessments and discussing whether the proposals were realistic.

Budget-setting process:

3.14. The Task Group noted the challenging financial situation and uncertainty that the Council face in its budget setting process. The biggest impact on the Council's budget for next year will be inflation, which officers predicted will be at its highest this and next year. The Corporate Director of Finance and Resources stressed the challenge of identifying savings of £18m in the next year and achieving the savings target of £28m for the next 2 years, due to factors such as demographic changes in Brent, likely cost of inflation and changes in income streams e.g. grants or funding from central government, Council Tax, Business Rates etc.

3.15. The Deputy Leader and officers stressed that the assumptions made in the Draft Budget 2023/24 reports are based on the information currently available to the Council, which would be reviewed following details on the final Local Government Finance Settlement.

3.16. The budget gap between 2023/24 and 2024/25, estimated at £28m, was a central case based on current budget assumptions and scenario modelling. The accuracy of this is at best +/- 20%, and wider variations are entirely plausible. Due to volatility in the economic environment the Task Group agree with the Council going with a central case – officers stressed the importance of guarding against being overly pessimistic or overly optimistic to ensure we do not implement decisions (e.g. service/staff cuts) that are later determined unnecessary.

3.17. Due to the uncertainty in the economic environment, it was noted that the Council had diverted from customary practice and planned to set a one-year budget on this occasion to allow for agility in the budget setting process. The Task Group were assured that the budget would be kept under review with assumptions being updated as and when needed.

3.18. Officers stressed that the budget proposals for 2023/24 are mainly focused on transformation and staff restructures to protect frontline services. However, being creative and focusing savings in this manner is becoming increasingly difficult, particularly when considering the cuts the Council have experienced over the last 10 years.

3.19. Officers described two main areas for growth in the budget, which are in Adult Social Care & Health (ASC), and Children & Young People. The growth mainly relates to the rising costs of placements and the increasing demand for services, which is one of the main contributors for the £28m budget gap.

Alignment with Borough Plan:

3.20. The Task Group shared the concerns it had around how the budget aligns with our strategic priorities and whether the budget is resourced enough to achieve our strategic ambitions. The Task Group called for clearer alignment and synergy; for example, more commitment in the budget to climate action considering it is a strategic objective for the Council to achieve Net Zero by 2030.

Core Assumptions:

3.21. The Task Group presented questions on the assumptions made throughout the budget and asked how confident the Council are in achieving these proposals. Officers stressed that these are based on 'educated' estimates, based on the latest information available, scenario modelling and sensitivity analysis. For example, determining population growth based on assumptions using the planning information around housing constructions in Brent over the next few years. Nonetheless, officers' assumptions are established based on worst case, best case, and central case - we normally go with the latter. Inflation predictions are developed using information from Bank of England and the Office for National Statistics.

Proposed Council Tax Increase:

3.22. The Task Group raised concerns with the potential impact that increasing Council Tax by 2.99% could have on residents and what we are doing to mitigate the impact of this on residents experiencing financial hardship. It is important to note the Autumn Statement was published on the day of Evidence Session 1. This statement confirmed that local authorities are now able to raise its Council Tax by 4.99% without a referendum, however this increase would exacerbate the Task Group's concerns.

3.23. The Task Group acknowledged that if the Council does not increase Council Tax by the maximum 4.99% it would forgo additional income of £2.8m. If the Council adopts this increase, schemes such as the Council Tax Reduction Scheme and Residents Support Fund should be increased and the eligibility should be reviewed. The Task Group also stressed the importance of the Council communicating to residents where any additional income from any Council Tax rises would be invested.

Minimum Revenue Provision (MRP):

3.24. The Task Group asked questions around our position in relation to borrowing, and our approach to Minimum Revenue Provision (MRP). The Task Group were assured that the provision remains prudent and compliant with the statutory guidance for MRP. The Corporate Director for Finance and Resources stressed the importance of the Council setting sufficient MRP and not borrowing without a robust strategy for paying monies owed back.

Reserves Strategy:

3.25. Officers discussed the reserves strategy we have in place, the various reserves that exist and what they can be used for e.g. if they ringfenced or earmarked for certain activity. Reserves should never

be used to balance a budget; this is due to their one-off nature, therefore they should only be used in line with the key principles outlined in our reserves strategy:

- The balance on the general reserve will be reviewed as part of the budget setting process
- Earmarked Reserves will only be established to meet a defined purpose
- Reserves should only be used to fund one off items as they can only be used once

3.26. The Task Group were satisfied that the Council had a robust process in place for managing reserves.

Consultation/Engagement Activity:

3.27. Officers outlined consultation/engagement activities which had taken place/were planned, including plans to engage with younger residents, businesses and the voluntary sector.

3.28. The Task Group sought assurances around how trade unions will be engaged, in addition to engaging businesses. The Cabinet Member Community Engagement, Equalities, and Culture acknowledged this and invited any further input on how to improve/widen consultation efforts.

Children & Young People

3.29. A total of £2.4m savings are proposed in the Children and Young People Directorate for 2023/24 – the proposals are designed to protect the delivery of our statutory duties and should also be viewed in the context of 10 years of financial pressures. The Task Group explored the practicality of the budget proposals, including the impact they would have on residents/service users and how the risks would be mitigated.

3.30. The Task Group discussed the £1.7m overspend projected in the Q2 Financial Report 2023/24 and how the risks were being managed. This was driven by 3 factors:

(1) Placement costs
(2) Agency spend for Social Workers
(3) Number and cost of care packages for disabled children and young people

3.31. The risks of these financial pressures will, in part, be mitigated by the growth allocated to the budget in 2023/24. Additionally, an active bid was made to the Department for Education (DfE) to build our own children's home. Should this be successful, this will assist the Council in managing future pressures.

High Needs Block of the Dedicated Service Grant (DSG):

3.32. The High Needs Block of the DSG will be increased by 5% (£3.5m) in 2023/24 following the July announcement, however financial pressures for the Council still remain with a deficit of approximately £17m. This is due to increased demand for Education Health and Care Plans (EHCPs), which is a national issue. This also presents ongoing financial pressures for our schools. The Task Group heard that the Council is a part of the DfE programme to try and find ways of reducing the pressure on the High Needs Block and have a Deficit Recovery Management Plan in place.

3.33. Separately, it was announced that an additional £2.3b funding from central government was announced for schools to support the running of schools which in real terms is an increase for schools. In light of the Autumn Statement funding announcement, the High Needs Block allocation will increase by an additional 5% equating to an overall 10% (£7m) increase in 2023/24. This increase will still not be sufficient to mitigate the demand pressures and recover the deficit as the additional funding is also expected to contribute towards inflationary increases for special schools and pupil referral units (PRUs).

3.34. The Deficit Recovery Management Plan consists of three themes:

- Reducing costs through **managing demand** for EHCPs.
- **Improving sufficiency of local places** thereby reducing the number of children being placed out of borough or in independent special schools that cost more than local places. The Council has made a capital investment of £44m to deliver additional SEND places in the borough.

- **Financial management** to identify areas of efficiencies.

Early Help:

3.35. Difficult decisions will need be made in non-statutory areas such as Early Help which, in the most acute cases, could result in more children going into care. The Task Group were satisfied that there were no plans to reduce key workers and workers in Early Help. The types of posts that are likely to be affected by proposed staff reductions will be deleted as they become vacant and are those that provide additional services such as parenting support within Children's Family Wellbeing Centres.

3.36. It was also acknowledged that unlike other local authorities, Brent has developed Family Wellbeing Centres to provide early intervention support across a wider age range for children. The Secretary of State has visited Brent, and has now started to recommend all Councils open Family Wellbeing Centres (referred to as 'Family Hubs') because it is a good way to streamline services, and that those services are required and so on.

3.37. It was also noted that the funding settlement for the Supporting Families Programme has been agreed for the next two financial years. Grant income from this programme can be used to off-set some of the Early Help reductions the Council plan to make. The Corporate Director for Children and Young People also mentioned we had been successful in bidding for the Best Start for Life Programme through the DfE, which is a programme that bring us about £4m worth of income over three years.

3.38. The Task Group asked whether the Council will be looking to increase the eligibility thresholds for people accessing Early Help support, however revised national guides for partners do not propose any change.

Reduction in the use of Agency Staff:

3.39. The Task Group questioned the intention to reduce agency staff in a climate where there are challenges in recruiting permanent staff. This issue was echoed by officers where it was highlighted there are specific challenges in areas such as children protection and social work provision.

3.40. The Cabinet Member highlighted that reviewing the use of our agency staff could save the Council more money to reinvest in services. Concurrently, the Council are trying to offer more substantial incentives to permanent social workers that reduces costs and provides greater stability for service users. The Task Group appreciated and supports the Council's ambitions to recruit more permanent staff but were not as confident in the proposals to reduce agency staff due to the recruitment challenges that exist nationally. The group retain concerns about the achievability of this proposal.

Deletion of Vacant Posts:

3.41. The removal of vacant posts across the directorate will leave social workers with manageable caseloads and will not impact service delivery.

3.42. The rationale behind not recruiting to a vacant post in the Youth Offending Team was linked to national reductions in first time entrants to the criminal justice system and stabilised rates for repeat offending. Providing this remains the case, this specific proposal is realistic and manageable.

Reducing the Supporting Young People Contract, ('*Connexions*'):

3.43. The Task Group were assured that the reduction of £80k would be offset by grants the department receive elsewhere

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Digital Transformation Savings

3.44. The Task Group raised accessibility/equal access concerns about the proposal relating to additional digital savings via the Digital Transformation Programme. To mitigate this the Council will maintain key worker contact for those families who are unable to use automated systems or chatbots. It was noted that there was evidence to support this; for example, school admissions where some families are struggling with the online process.

Communities & Regeneration

3.45. A total of £612k savings are proposed in the Communities and Regeneration Directorate for 2023/24.

Planning Service Staff Reduction:

3.46. It was stressed that the reductions to the planning service equates to not recruiting to vacant posts, meaning that no impact to service delivery is anticipated. However, the biggest risk in the proposals is the length of time to review planning applications and officer caseloads. Additionally, notable pressures for the Planning department are inflation, increased construction costs, and rising interest rates, deterring developers coming forward to build in the borough. Some of these factors have also impacted our own housing programme.

3.47. Despite this, the need to continue to build council housing was highlighted, although we will have to start thinking about tenure as it is no longer financially viable to build solely social housing. This is a concern of the Task Group in terms of impacting our ability to increase Council housing stock and offering truly 'affordable housing'. The Chief Executive appreciated this but acknowledged its either we think about mixed tenure to deliver some affordable housing or build none at all. The Task Group stressed that we need all tenures to be affordable, even if this is private housing. Whatever model the Council decides to use it must ensure it is in a strong negotiation position with possible contractors.

Reduction in Town Centre Managers:

3.48. The Task Group raised concerns with the proposal to reduce town centre managers, and whether this would have an impact on service output. The importance of these posts post-Covid in supporting deprived areas of Brent with economic recovery was emphasised. However, the post proposed for deletion is already vacant and there will be no compulsory redundancies – the work across town centres has been redistributed to the three current Town Centre managers. It was questioned whether this proposal warrants a new approach to town centre management e.g. a centralised function to distribute resource according to need.

Reduction in number of Communications Account Managers:

3.49. Additionally, there were concerns raised about reducing the Communications Team from five to three given it has been identified that there is room for improvement in Brent communications and consultations. It was clarified that this £100k saving will consider all communication posts in the Council rather than just from the Communication Team that sits in Communities & Regeneration. The aim of this proposal will be to streamline the service rather than impacting delivery.

Governance

3.50. A total of £475k savings are proposed in the Governance Directorate for 2023/24.

'Miscellaneous Expenses Reduction':

3.51. The Task Group questioned what the 'Miscellaneous Expenses Reduction' meant in practice. The Corporate Director for Governance explained that this proposal is already in place and has little impact on service delivery as the Council has been spending less on the DX (documents exchange - private postal service). Since the pandemic the courts have made technological changes, allowing for electronic bundling of court documents, and there is also now the ability to sign contract and similar documentation electronically via DocuSign.

Reductions in Corporate Learning and Development Budget:

3.52. Questions were raised on reducing the Corporate Learning and Development training package, and assurances were given that this would not impact department specific training packages. The task group suggested that staff satisfaction surveys inform this reduction.

Reduction in Legal Fee Budget:

3.53. The Task Group questioned the practicality of the proposal to reduce the Legal Fee Budget. The Corporate Director advised that this proposal partly reflects the fact that we have been conducting more in-house advocacy and have been recruiting to advocacy posts which is cheaper than paying for external barristers. The Legal Fees Budget is around Counsel's advice and representation and

court fees; the more we can do complex advocacy ourselves, and the more knowledgeable and skilled staff we have, the less we need to spend to instruct Counsel and this reduction reflects what in practise has been happening.

Finance & Resources

3.54. A total of £1.8m savings are proposed in the Finance & Resources Directorate for 2023/24.

Capital Programme:

3.55. It was noted by the Corporate Director for Finance and Resources that undertaking Capital Programmes is still problematic for the Council; we still have an issue where we have to go out to tender for any Capital Programme, for example housing, and the cost of this has gone up by 20-30%. Interest rates have also gone up so when we are borrowing money for Capital Programmes these costs also go up, which we will have to finance through the General Funds. So again, budget reductions will be required to off-set those additional costs.

Civic Centre Office Let:

3.56. The Task Group questioned the proposal to let more space in the Civic Centre given that most workplaces are catering more for home working and that many organisations are moving further to the outskirts of London. The Corporate Director for Finance & Resources advised that we are trying to rent more space to public sector organisations rather than private organisations as they require more consistent office presence from staff. Additionally, an asset review is taking place to determine other income streams, with findings being reported to the Resources and Public Realm Committee at a later date.

Income Generation:

3.57. The Task Group were concerned if the Council has explored enough ways to generate new income streams, specifically in relation to increasing fees and charges e.g. increased car parking charges. Officers welcomed any Task Group suggestions.

3.58. The Corporate Director for Finance and Resources cautioned around the challenges of price elasticity of demand i.e. the striking balance of increasing charges and the impact on service use. The Task Group proposed introducing parking charges for motorcycles and explored whether we should charge more for the various licenses we issue e.g. alcohol licenses, gambling licenses, Air B&B licenses etc.

Stakeholder Q&A session

3.59. This session was held on 29 November 2022 and attended by colleagues from the voluntary, community, and business sectors (a full list of external witnesses who contributed to this report is outlined in section 5 of this report). The Deputy Leader and the Corporate Director for Finance and Resources were also present.

3.60. The Task Group sought to understand stakeholder views on the proposals; their experiences, pressures and priorities, and where they believe Council investment should be targeted moving forward.

3.61. Areas of particular focus included:

- **Budget Suitability** – reviewing the accuracy of the equality impact assessments for each budget proposal and the assumptions that sat behind them.
- **Front-facing roles** – ensuring that we do not cut any front facing roles, especially in areas such as Housing which has seen in recent years rough sleeping in Brent dramatically increase.
- **Budget Narrative** –being more clear in the narrative of the budget how the proposals will impact residents; and what our vision/priorities are for the borough so residents can provide meaningful consultation feedback in line with our strategic priorities.
- **Working relationship with the VCS** – improving our communications around the proposed changes with our VCS sector so they are equipped to explain changes to service users and can adapt their own service offer as appropriate

- **Accessible communications and engagement plans –** improving our standard of accessibility of communications for our disabled residents in communicating the proposals
- **Targeted engagement with residents/service users** – e.g. the need to carry out more targeted engagement than planned, especially on the ASC & Health and Children and Young People proposals which will disproportionality affect young people and those with disabilities/learning needs
- **'You Said, We Did'** - ensuring that feedback is provided to residents on what action the Council is taking as a result of their budget consultation/engagement responses
- **Digital Transformation** – e.g. ensuring that those with accessibility needs are catered to deal with new digital requirements in form-filling; and the process not being obstructive to residents in accessing extra funds/entitlements during a time of financial struggle.

3.62. Our stakeholders' priorities for Council investment included:

- More affordable and suitable permanent housing (although the group welcomed the proposed investment in Temporary Accommodation)
- Additional financial support for residents who historically wouldn't qualify for support but who are now in poverty as a result of the current economic climate e.g. children who are in poverty but cannot access free school meals
- Additional support for the VCS sector to deal with the increased demand in services. This could be additional financial support or providing more community assets/capped peppercorn rents to the sector to expand their operations. Another option would be to increase the value of the commissioned contracts offered to the VCS to help them navigate the current volatile economic environment.
- Targeted jobs and employment support in the most economically deprived areas in the borough (e.g. St Raphael's Estate)
- Targeted jobs, employment, and apprenticeship support for our most vulnerable residents e.g. those with disabilities
- Additional advice and support for disabled residents and those with other access needs (e.g poor literacy/English not as a first language etc.) to navigate digital-form filling so they can maximise the income they are eligible for and entitled to

Evidence Session 2

3.63. Evidence Session 2 was held on 1 December 2022; the Task Group reviewed the remaining budget proposals for ASC & Health; and Residents Services; and the possible impacts on service delivery.

3.64. Key attendees included the Cabinet Member for Public Health and Adult Social Care; the Cabinet Member for Environment; the Cabinet Member for Housing, Homelessness & Renters' Security; the Corporate Director of ASC and Health; and Corporate Director for Resident Services.

Adult Social Care & Health

3.65. A total of £4.2m savings are proposed in the Adult Social Care & Health Directorate for 2023/24.

3.66. It was stressed that although all services remain Care Act compliant, provision over the last 10-12 years has been significantly stripped back to the minimum service which is solely focused on supporting and ensuring the safety of the most vulnerable.

3.67. Given the continued need to reduced provision the Task Group questioned at what point and how far services are from being unable to deliver on statutory responsibilities. The Corporate Director advised that this was uncertain, and that the Council will be able to provide more detail when central government announce Brent's Local Finance Settlement.

3.68. The Task Group went onto question the assumptions made in the proposals, and how officers arrived at their decisions. The Corporate Director advised that it involved a collaborative process with colleagues looking at need across services, benchmarking our services with other local authorities, and identifying significant pressures in the directorate and how we mitigate these pressures. For example, reducing the use of agency staff and recruiting more permanent staff.

3.69. The group questioned how realistic it is for the department to deliver £4.2m of savings with minimal impact to residents' experience. The Corporate Director shared these concerns and stressed that all proposals have been RAG rated from high risk to secure. The higher the risk, the more mitigation that has been put in place if the proposal cannot be achieved.

Reduction in the use of Agency Staff:

3.70. The Task Group questioned the proposal to reduce agency staff and increase permanent staffing in a climate where there are recruitment and retention challenges. The Corporate Director for ASC and Health admitted that it is very challenging but noted that mitigations/plans have been put in place to achieve this saving. These mitigations include plans for international recruitment, and making permanent roles more attractive to prospective applicants. It was emphasised by the Corporate Director that higher levels of permanent staff are correlated with a higher quality service, where the department will remain focused on delivering this saving.

Promoting Independence in Adult Social Care:

3.71. The Task Group delved into the proposals that aimed to maximise independence for service users (particularly proposals AH01 and AH02). The Task group were concerned that these proposals were being led by a 'cuts agenda' rather than an 'independence agenda' and were concerned that this could lead to insufficient support being in place for service users. In response to these points, the Corporate Director offered the following responses:

1. With regards to learning disabilities placements, colleagues are very skilled and work closely with families to ensure steps to independence are put in place at the very right time.
2. With regards to reducing resident placements, this is also a positive as we have less people going into residential care so the demand is not as high as it was before. The risks associated with this proposal will also be offset by the opening of Honey Pot Lane.
3. With regards to the home care reduction, this proposal will focus on reducing double ups which is in line with service users wishes. They prefer one person coming into their home rather than two. It is also important to note that Care Act assessments are carried out by trained social workers to ensure the assessments are robust and accurate.

3.72. The Task group questioned how quality assurance of care will be achieved in the proposals aimed at 'maximising independence'. The Corporate Director stressed that individual assessments are carried out by qualified social workers/occupational therapists, and they are all checked and signed off by their line manager – a more senior and experienced practitioner. Also, this is supported by how we train and develop our staff through the Adult Social Care Skills Academy. Additionally, the department run audits on a quarterly basis to see what can be improved to those Care Plans. They also get feedback in from complaints and other partner organisations. The Council have a rigorous process, people are trained, their decisions are always checked and then we have sample checking and quality assurance checks.

Mental Health Placements:

3.73. The Task Group heard evidence that mental health referrals had increased and questioned the effectiveness of the proposals to refresh the review process for all MH service users with a view to putting in place step down plans into general needs accommodation. Concerns were raised that step down plans could be put in place at the wrong time. Officers assured the Task Group that the process of doing so was a collaborative process with CNWL who provided secondary mental health services, and talked us through the recovery pathway. In this approach, it is recognised that mental health relapses do happen where it is vital to ensure the right support is in place at the right time. The group felt the commitment to recovery is admirable, but this is best achieved with sufficient support in place, including tenancy management support.

3.74. The Corporate Director for ASC and Health went onto explain that the department focused on all issues relating to Mental Health. It is a priority for all of our Partners in Brent, and we have the backing from CNWL, our providers and the voluntary and community sector and now we have got Clinical Leads across a number of services so it is all completely integrated with Integrated Care.

3.75. The Task Group went onto consider whether we had sufficient support arrangements in place for those in general needs accommodation. The group were assured that we do have enough floating support but the question is if we could change that floating support to better train and professionalise this might lead to better outcomes.

3.76. It was considered whether the NHS are inputting enough into social care initiatives. The Task Group noted the need for the NHS to step in and release some of the burden from our social workers. The Corporate Director said that through the Brent ICP we are working together to identify gaps in provision and if those gaps relate to health services then the NHS would be encouraged to fill those gaps, and jointly in Brent we are making the case for more funding to come to Brent to recognise historically lower levels of funding and greater need.

Resident Services

3.77. A total of £4.2m savings are proposed in the Resident Services Directorate for 2023/24.

3.78. The Task Group raised concerns with the language being used to describe cuts relating to the environmental services, and whether we are properly managing residents' expectations. The Cabinet Member for Environment committed to working with officers on the language in the proposals to better manage residents' expectations and prepare them for what is to come. For instance, differentiating between the proposals that equate to cuts/service reductions and the proposals that equate to efficiencies/service transformation.

3.79. The Task Group went onto consider the cumulative impact of cuts to residents' services over the last 10-12 years, and how we are managing these major gaps. Additionally, the feasibility of the budget proposals along with the impact they would have on residents/service users and how the risks would be mitigated were also reviewed.

3.80. The Corporate Director of Resident Services explained that we have been good at mitigating cuts by investing in technology and investing in different ways of working so that over time this helps to deliver the outcomes we want with a reduced cost.

Income Generation:

3.81. The Task Group also raised concerns on whether we are ambitious enough to generate new income streams to offset some of the cuts listed in the proposals. Specifically in relation to increasing fees and charges e.g. increased car parking charges. Officers were of the view that have pushed our proposals as much as possible in terms of generating income for parking fees/charges, which must be set for the purposes permitted under the legislation. Although options are currently being considered to introduce parking charges to motorcyclists. The Task Group highlighted that many motorcyclists in the borough (e.g. delivery drivers) have some of the lowest annual incomes and unstable employment (e.g. 'zero-hour/casual contracts'). Therefore, would have concerns if new parking charges for motorcyclists were introduced that significantly impacted this cohort of residents' livelihoods.

3.82. The Task Group also questioned whether we have been ambitious enough in pursuing payments that we should be getting from other companies e.g. contractors for breach of contract. Questions were presented on how the Council could better monitor our contracts and make sure that we get money back from our contracts when they are not fulfilled. The Cabinet Member explained that officers have regular meetings with all of our contractors on a regular basis where they have breached KPIs etc. They are required to make payments due under the contract in such circumstances. They do pay that amount. The Cabinet member went on to explain that these monies are reinvested into resident services.

Housing Revenue Account:

3.83. Since 2020/21, and originally for the following four years, the Council had the power to increase rents annually up to a maximum of CPI plus 1%. However due to the rapid rise of inflation within the context of the Cost of Living crisis, the government consulted on introducing a rent increase cap. The consultation included proposals for capping rent increases at 3%, 5% and 7%, all of which are below CPI + 1%. A central case scenario of a 5% rents cap was used for budget planning purposes in the draft budget, but it has since been confirmed that the maximum will be 7%. Officers acknowledged this as good news for the Housing Revenue Account and equates to a £1m increase to the HRA when compared to the draft budget estimate. Anything below 7% would have meant significant cuts to be made to our HRA, purely on the management and maintenance of our stock.

Increased Temporary Accommodation:

3.84. The Task Group praised the decision to protect frontline housing services and plans to invest in building temporary accommodation due to increased homelessness in the borough.

3.85. The group also welcomed the proposals to increase the amounts of temporary accommodation through acquisition of other social housing providers stock, although it had hesitations on the assumptions that were made in this proposal. For instance, whether there would be an appetite for Notting Hill Genesis to sell their stock. The Cabinet Member for Housing, Homelessness & Renters Security acknowledged that these concerns were legitimate. The Corporate Director for Finance and Resources stressed that risk mitigation had been built into this proposal, as well as the rest of the proposals.

Deletion of Vacant Posts:

3.86. The Task Group went on to consider the impact of the deletion of vacant posts throughout the proposals, and whether these have led to staff being overstretched in their existing roles. The Task Group noted officers' views that this risk was being managed through digital transformation, with staff work focus being on value-added work.

Use of Chatbots in Service Transformation:

3.87. The Task Group raised concerns with the increased use of chatbots, especially for those people with accessibility support needs. The Corporate Director assured that with the digital transformation proposals, there will still be options for vulnerable residents to interact and receive support from staff e.g. via Brent Hubs. It was stressed that we have 120 digital champions in place to support residents with accessibility support needs, where this figure will rise to 500 by 2026.

3.88. The group noted the proposed risk mitigations but stressed the need for chatbots to be trialled and tested by residents, especially those with accessibility needs.

Reducing Library Stock:

3.89. The Panel heard evidence that in reducing library stock, the aim is to reduce the books that are not currently being used. It is expected that this saving of £62k will not impact the resident experience. The Task Group accepted this but acknowledged that further mitigations should be explored to manage the risks associated with this proposal.

Street Light Dimming:

3.90. The Task Group were satisfied that the proposal to enact street dimming in certain areas to reduce energy costs was balanced with the need to ensure the safety of residents. The Cabinet Member for Environment stressed that when cuts are made to lighting, we carry out an audit of all the roads in Brent, and see where it is safe to carry out dimming activities. It was stressed that the Council would not go below the recommended Road Safety level for lighting. Also, any areas where there are concerns around crime would not be affected by these proposals.

3.91. The group noted the points made by the Cabinet Member, and highlighted the need to involve residents with visual impairments/mobility needs in the audit process.

Redefining Local Services:

3.92. The Task Group noted that two of the draft budget proposals (RS13 and RS18) within Residents Services relate to the 'Redefining Local Services' programme, where many of the contracts therein at the time of this meeting were still undergoing live procurement. The group confirmed that these proposals, specifically those relating to the Integrated Street Cleansing, Waste Collections and Winter Maintenance Services Contract Procurement Programme would be scrutinised in greater detail by the Resources and Public Realm Scrutiny Committee at an additional meeting on 15 December 2022. Numerous recommendations have since been put forward to the department inviting responses in time for the Resources and Public Realm Scrutiny Committee meeting on 22 February 2022[2].

3.93. The Task Group questioned the specific proposal relating to the review of the Brent Transport Service. It was stressed this was not a cut, but rather a service transformation. The idea is to ensure we are not doubling up on some routes. Currently the service is not running at the best capacity and not helping the SEND children, in terms of the route that they are taking. We are looking to transform the service to ensure we get the best outcome for SEND children, and for the Council in terms of how much we pay. The Task Group were satisfied that this would not impact our children with SEND.

Final Evidence Session

3.94. The final evidence session was held on 6 December 2022.

3.95. Key attendees included the Deputy Leader, the Chief Executive, and the Corporate Director of Finance & Resources.

3.96. At this session, the Task Group commended the budget as being well-informed but stressed to cabinet members and senior officers that improvements could be made to our consultation efforts so it is clear to residents what our vision/priorities are for the borough. This could increase our data set of consultation responses and invite more meaningful feedback.

3.97. The group raised concerns with the cuts-based proposals outlined in the budget for 2023/24 and revisited how the Council can increase its income streams to offset the impact of these cuts on Council services. It was suggested that the Council could perform a benchmarking exercise with other local authorities to identify viable options for income generation. The group also suggested for the Cabinet to utilise our community assets (such as parks) for income generation should the evidence allow us to do so.

3.98. The Panel raised concerns with the deletion of vacant posts in this budget, which sparked a wider conversation on the cumulative impact of staffing cuts over the last 10-12 years of austerity and how we are effectively responding to this. Albeit not a recommendation, we suggest that it would be worthwhile for the Council to undertake a comparison from 2010 to 2022 pertaining to workforce figures and the impact that this has had on our operations.

3.99. Nonetheless, the Task Group discussed and agreed the recommendations that would be made to Cabinet and Full Council, based on all of the evidence heard to date. For transparency purposes, the Chair flagged that possible amendments and changes could be made to the recommendations discussed and agreed in this meeting ahead of reviewing and digesting additional evidence outside of this meeting. Any additions would be reflected in this final report.

3.100. Final recommendations can be found in section 2 of this report.

[2] https://democracy.brent.gov.uk/ieListDocuments.aspx?CId=551&MId=7251&Ver=4

4. Conclusions

4.1. Given the extremely challenging circumstances that local authorities are facing with regards to budget pressures and financial planning, the Task Group believes that this report underlines the importance of Scrutiny's role as critical friend and a check and balance in reviewing the Council's budget proposals and budget performance throughout the annual cycle.

4.2. We are satisfied that the budget proposals for 2023/24 are designed to limit, as far as possible, service reductions and the impact to front line services. We are of the view that the Council has correctly balanced its responsibilities and risks; and maintained a strong financial position during an extremely tough time where there is a high level of financial uncertainty and significant funding pressures due to factors such as high levels of inflation, economic turmoil resulting from war in Ukraine, the Government's short-term funding settlements, delays in funding reforms, the effects of the cost of living crisis on residents and businesses in the borough and the ongoing impact of Brexit. Taking these issues into consideration, we agree with the Council's approach to restrict its budget proposals to a single year, rather than a customary two-year programme, to allow for flexibility in the budget setting process.

4.3. We have noted the significant savings required over the next 2 years is in addition to the £196m removed from the Council's budget since 2010. We have also noted that the precise figure of savings required for the next 2 financial years is likely to change due to the unexpected additional funding provided to the Council via the Local Finance Settlement from central government.

4.4. Although the Council has managed to set a balanced budget for 2023/2024 without severely impacting frontline services, it is only a matter of time before this becomes a reality with the challenging financial environment and uncertainty ahead. Moving forward it will be critical for the Council to double its lobbying efforts for additional funding to continue to provide an adequate level of support to our residents, especially as we navigate through the Cost of Living Crisis. We appreciate initiatives such as the Resident Support Fund and the Council Tax Support Scheme provide residents in financial difficulties with additional financial support. However, we hope these services are bolstered in some capacity as it is likely we will see more residents who historically do not access such support now requiring support to pay towards their increased living costs as a result of the forthcoming Council Tax increase, high inflation, rising energy costs, and rent increases.

4.5. We encourage the Council to continue to put residents at the heart of the budget priority setting, informing what the Council does and who it does it for. We believe there are further opportunities for the Council to closer align the budget proposals for 2023/24 with the democratically agreed strategic priorities identified in the new Borough Plan 2023-27.

4.6. We note that each of the budget proposals considered have been subject to equality impact assessments (EIAs) to assess their potential or likely impact on service users and employees with protected characteristics and where the EIA identifies a disproportionate negative impact with no reasonable mitigation, the proposal would be subject to a full EIA and could be changed or even rejected altogether. We do however suggest that officers relook at all EIAs conducted to ensure absolute accuracy and that they reflect the voices of those impacted.

4.7. Overall, the Task Group are satisfied that the proposals outlined aim to deliver efficiency measures, service transformations, cost reductions and income generation to protect front line services as much as possible. However, due to the scale of savings that need to be made on this occasion it is inevitable for the effects of the proposals to impact residents – directly or indirectly. It is important for Cabinet to ensure the risks of the proposals are risk mitigated as best as possible to ensure the Council continue to offer high quality services to residents.

4.8. The Task Group acknowledges that is unlikely we will see an end to cuts to funding in the next 2 years. We encourage the Council to think more creatively on how we close our budget gaps without making significant cuts to services. For instance, developing innovative ideas to generate income from our assets and build on our legacy as a 'London Borough of Culture'; as well as leveraging funding from our anchor institutions (and relevant agencies) to deliver on joint initiatives for the common purpose of enriching our residents' lives.

4.9. The Task Group would also welcome more investment in the voluntary and community sector. The pandemic demonstrated the reliance on the sector to help residents access support and advice, and their role of providing a safety net to the Council in delivering vital services.

4.10. The Task Group supports the Draft Budget, subject to the outcomes of final consultation, and submits the recommendations outlined in section two of this report to the Resources and Public Realm Scrutiny Committee, Cabinet and Full Council for consideration. This report is not the end of the budget scrutiny process and we look forward to discussing our recommendations and the budget as a whole at future meetings.

5. Participants

We commend the Council for the prudent, tough financial decisions it has taken in recent years to ensure we have achieved a balanced budget, despite facing significant cuts to local government funding.

We would like to thank the following members for giving up their time to take part in this process, and also to the many council officers who worked extremely hard to support and provide us with information and advice on policy when needed:

- Councillor Muhammed Butt - Leader of the Council
- Councillor Mili Patel - Deputy Leader and Cabinet Member for Finance, Resources & Reform
- Councillor Fleur Donnelly-Jackson - Cabinet Member for Community Engagement, Equalities & Culture
- Councillor Harbi Farah - Cabinet Member for Safer Communities & Public Protection
- Councillor Gwen Grahl - Cabinet Member for Children, Young People & Schools
- Councillor Promise Knight - Cabinet Member for Housing, Homelessness & Renters Security
- Councillor Neil Nerva - Cabinet Member for Public Health & Adult Social Care
- Councillor Krupa Sheth - Cabinet Member for Environment, Infrastructure & Climate Action
- Councillor Eleanor Southwood - Cabinet Member for Jobs, Economy & Citizen Experience
- Councillor Shama Tatler - Cabinet Member for Regeneration and Planning
- Carolyn Downs – Chief Executive
- Minesh Patel – Corporate Director, Finance & Resources
- Peter Gadsdon – Corporate Director, Resident Services
- Phil Porter – Corporate Director, ASC & Health
- Nigel Chapman – Corporate Director, Children & Young People
- Debra Norman – Corporate Director, Governance
- Ravinder Jassar – Deputy Director of Finance
- Tom Pickup – Policy Partnerships and Scrutiny Manager
- Jason Sigba – Strategy Lead, Scrutiny
- George Kockelbergh – Strategy Lead, Scrutiny

The Task Group would also like to thank the following valued partners and stakeholders, who contributed to our discussion to ensure robust consideration of the 2023/24 budget proposals:

- SUFRA North West London
- Crisis Skylight Brent
- Brent Mencap
- Brent Multi-Faith Forum
- West London Business
- Brent Youth Parliament

Committee Contacts:

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Appendix - E

Detailed Capital Programme 2022/23 – 2027/28

Portfolio Holder	Portfolio	Capital Board	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	TOTAL 2023/24 to 2027/28
			£000	£000	£000	£000	£000	£000	£000
Resources: Cllr Mili Patel	Civic Centre - Capital	Corporate Landlord	0.5	3.6	20.4	1.5	-	-	**25.483**
	Digital Strategy - Capital	Corporate Landlord	5.0	4.9	3.0	1.1	0.5		**9.429**
	Energy - Capital	Corporate Landlord	3.7	-	-	-	-	-	**-**
	ICT - Capital	Corporate Landlord	4.6	1.9	3.6	-	-	-	**5.500**
	Libraries - Capital	Corporate Landlord	0.8	-	-	-	-	-	**-**
	Oracle Cloud Programme - Capital	Corporate Landlord	1.7	-	-	-	-	-	**-**
	CNWL - Capital	Corporate Landlord	-	-	-	13.7	8.5	27.7	**49.933**
	Equipment for Flexible Working - Capital	Corporate Landlord	0.3	-	-	-	-	-	**-**
	Family Wellbeing Centre - ICT Infrastructure - Capital	Corporate Landlord	0.4	-	-	-	-	-	**-**

	Property Management - Capital	Corporate Landlord	0.3	-	-	-	-	-	**-**
Regeneration & Planning: Cllr Shama Tatler	South Kilburn Phase 3a - Capital	South Kilburn	1.3	6.2	-	-	-	-	**6.200**
	South Kilburn Phase 3b - Capital	South Kilburn	1.0	0.6	-	-	0.5	-	**1.079**
	South Kilburn Phase 4 - Capital	South Kilburn	2.4	15.4	10.5	1.6	0.8	0.9	**29.133**
	South Kilburn Phase 5 - Capital	South Kilburn	1.2	3.9	0.3	0.1	0.2	-	**4.551**
	South Kilburn Phase 6 - Capital	South Kilburn	2.7	0.4	0.3	0.1	5.7	-	**6.410**
	South Kilburn Phase 7 & 8 - Capital	South Kilburn	1.4	0.4	0.5	-	4.2	6.1	**11.238**
	South Kilburn Legacy - Capital	South Kilburn	-	0.2	0.4	0.4	0.1	0.1	**1.100**
	South Kilburn Energy - Capital	South Kilburn	1.5	-	1.6	-	-	-	**1.632**
	S106 Affordable Housing - Capital	Regeneration	-	0.4	-	-	-	-	**0.444**
	New Homes Bonus - Capital	Regeneration	-	-	-	-	-	-	**-**
	Housing Zones - Capital	Regeneration	1.1	35.0	53.0	28.8	15.0	-	**131.801**

	Grand Union Canal Pedestrian / Cycle Bridge	Regeneration	-	6.9	-	-	-	-	**6.850**
	Harlesden Regeneration - Capital	Regeneration	2.5	2.8	-	-	-	-	**2.842**
	Morland Gardens - Capital	Regeneration	5.7	25.5	10.7	-	-	-	**36.194**
	SCIL - Capital	Regeneration	-	3.5	-	-	-	-	**3.472**
St Raphael's : Cllr Shama Tatler	St. Raphael's Estate Regeneration - Capital	St Raphael's	1.9	31.7	-	-	-	-	**31.700**
Regeneration & Planning: Cllr Shama Tatler	Landscaping - Capital	Public Realm	0.7	-	-	-	-	-	**-**
	Highways Management	Public Realm	13.8	11.4	7.8	7.8	-	-	**27.042**
	Highways Management - Lighting	Public Realm	0.1	-	-	-	-	-	**-**
	Healthy Streets & Parking	Public Realm	1.4	-	-	-	-	-	**-**
	Healthy Streets & Parking - S106	Public Realm	1.5	0.5	-	-	-	-	**0.451**
	Healthy Streets & Parking - Parking	Public Realm	0.2	-	-	-	-	-	**-**

	Healthy Streets & Parking - TfL	Public Realm	1.8	1.0	1.0	-	-	-	**2.080**
Public Health: Cllr Neil Nerva	Sports & Culture - Capital	Public Realm	0.4	-	-	-	-	-	**-**
Environment: Cllr Krupa Sheth	Parks - Capital	Public Realm	1.2	2.0	0.4	0.1	0.0	-	**2.462**
	Environmental Health - Capital	Public Realm	-	10.6	2.5	1.4	1.0	7.1	**22.651**
Children, Young People and Schools: Cllr Gwen Grahl	Children & Youth Facilities - Capital	Schools	-	2.2	-	-	-	-	**2.150**
	Expansion of School Places - Capital	Schools	0.0	-	-	-	-	-	**-**
	Phase 3 Permanent Primary - Capital	Schools	0.8	0.4	-	-	-	-	**0.400**
	SEND Expansion - Capital	Schools	6.1	24.1	14.0	-	-	-	**38.100**
	School Capital Improvement - Capital	Schools	5.5	8.4	6.4	2.2	-	-	**17.092**
Housing & Welfare Reform: Cllr Promise Knight	Aids & Adaptations - Capital	Housing GF	7.2	3.6	-	-	-	-	**3.628**
	Empty Property - Capital	Housing GF	1.5	0.7	0.7	0.7	-	-	**2.100**
	Mixed Development - Capital	Housing GF	2.4	22.7	8.3	1.7	1.7	-	**34.430**

	New Council Homes Programme (NCHP) - Phase 3 (GF) - Capital	Housing GF	50.0	34.4	16.6	23.5	3.0	-	**77.415**
	Feasibility 1 - Capital	Housing GF	0.6	0.2	0.2	0.2	-	-	**0.600**
	Housing Infrastructure Fund - Capital	Housing GF	7.3	2.1	-	-	-	-	**2.054**
	PRS I4B - Capital	Housing GF	19.9	18.4	-	-	-	-	**18.447**
	Supported Living - Capital	Housing GF	1.8	15.4	-	-	-	-	**15.379**
	Bridge Park Regeneration - Capital	Housing GF	0.0	0.2	49.6	-	-	-	**49.828**
	GF Central Fund - Capital	Housing GF	1.0	0.8	0.8	0.8	-	-	**2.520**
	Feasibility - Capital	Housing HRA	0.8	11.5	16.7	6.6	6.6	-	**41.415**
	RTB Affordable Housing - Capital	Housing HRA	20.2	11.0	9.9	9.9	5.9	-	**36.585**
	Enfranchisement - Capital	Housing HRA	1.2	-	-	-	-	-	**-**
	New Council Homes Programme (NCHP) - Phase 1 - Capital	Housing HRA	0.1	0.6	0.4	0.4	0.4	-	**1.711**

	New Council Homes Programme (NCHP) - Phase 2 - Capital	Housing HRA	0.4	1.5	4.2	-	-	-	**5.714**
	New Council Homes Programme (NCHP) - Phase 3 - Capital	Housing HRA	8.3	12.7	4.5	0.0	-	-	**17.272**
	New Council Homes Programme (NCHP) - Phase 4 - Capital	Housing HRA	1.9	9.0	3.9	1.7	1.7	-	**16.217**
	New Council Homes Programme (NCHP) - Phase 5 - Capital	Housing HRA	0.3	69.0	20.2	4.3	1.8	-	**95.255**
	Major Repairs & Maintenance - Capital	Housing HRA	12.1	19.1	29.8	12.1	6.5	-	**67.413**
	Major Repairs & Maintenance - Adaptations - Capital	Housing HRA	0.8	-	-	-	-	-	**-**
	New Council Homes Programme - Capital	Housing HRA	12.3	22.5	23.7	2.2	-	-	**48.374**

	In Borough Acquisition Strategy - Capital	Housing HRA	0.8	-	-	-	-	-	-
	NAIL - Capital	Housing GF	7.6	2.3	0.8	-	-	-	**3.088**
			232.440	**461.353**	**327.114**	**122.743**	**63.679**	**41.974**	**1016.864**

Funding Sources	Grants & Other Contributions		40.723	99.978	33.033	13.909	0.002	-	**146.922**
	S106 & CIL		15.481	24.137	6.138	6.500	-	-	**36.775**
	Capital Receipts		9.702	10.735	37.414	22.197	11.426	7.085	**88.856**
	Reserves		7.719	34.408	4.388	4.333	-	-	**43.129**
	Revenue Contribution		10.571	11.500	12.000	0.032	-	-	**23.532**
	Major Repairs Allowance		6.356	4.000	4.000	4.000	-	-	**12.000**
	Prudential Borrowing		141.887	276.595	230.141	71.772	52.251	34.890	**665.648**
			232.440	**461.353**	**327.114**	**122.743**	**63.679**	**41.974**	**1,016.864**

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Pipeline Project ID	Project Name	Portfolio	Programme and purpose of scheme	Proposed Budget (M)	Funding Proposals (M)	Business Case to CPB	Borough Plan Objectives	Strategic Alignment	Statutory Obligations	Risk	Financial Return	Demand Management	Rating
Corporate Landlord													
PL07	Energy Schemes	Corporate Landlord	**Energy Efficiency**: The Energy team are working with RE: FIT to develop future energy efficiency and renewable energy schemes, focused on demand reduction, LED installation and solar. Currently an estimate of energy schemes moving forward is in the region of £20m. The energy team have procured heat decarbonisation plans for the council's own estate and community schools. The initial estimates to decarbonise our own estate is £5m over and above the current grant funding. For schools, it would be a further £20m. The Climate Teams have applied for a grant under BEIS's Public Sector Decarbonisation Scheme for 16 of our community schools (which fit the eligibility criteria). The project costs are ~£5m, £3.7m of which would be covered from the grant.	25.0	£23.5 PSDS £1.5m Capital	May-23	**A Cleaner More Considerate Brent** - This investment will help make our buildings cleaner and greener, helping to address the climate emergency **Strong Foundations** - Investing in the infrastructure will improve productivity across the Council with custom built spaces to suit the service area needs.	Borough Plan Brent-climate - ecological-emergency-strategy-2021-2030	None	1. Grant has been obtained from Government, it has very tight delivery timelines 2. Competition - lots of other organisations will be competing in the market place for the contractors and resource to deliver these works	Increasing energy costs has meant that looking to mitigate demand will be in the Council's interests whilst also addressing the public demand for cleaner greener services.	None	2
PL021	Land & Property strategic acquisitions (general)	Corporate Landlord	**Strategic Acquisitions**: Papers will be taken forward to the Capital Programme Board when strategic land opportunities arise and are developed within regeneration areas. The key focus areas are Alperton and Staples Corner.	44.5	Ongoing	Ongoing	**A Future Built for Everyone, An Economy Fit for All** - Investment in the growth areas of the Council will enable the vision in the local plan to be delivered	Borough Plan Local Plan	None	1. Opportunities are market led and this difficult to predict 2. Generally investment opportunities in the targeted areas are popular as property assets are high performing or present good asset-management potential (re-development etc.)	Some opportunities will have income as part of the asset opportunity - this will be assessed on a case by case basis	Local Plan identifies these areas as in need of growth and regeneration to deliver benefits and help to accommodate significant numbers of new homes to meet housing targets	2
PL051	Commercial Property Asset Management Programme ***NEW***	Corporate Landlord	**Asset Management Programme:** The commercial property portfolio are key resources for the Council to provide economic return and public value. The commercial portfolio generates circa £3m rental income per annum from around 190 business and third sector lettings, which includes a number of multi-let buildings. In order to be kept in good use they require an inflow of financial capital for their maintenance, repairs, refurbishments and upgrades where needed for the purposes of maintaining or upgrading the stock of physical capital over time**.**	0.8	Borrowing	TBC	**Strong Foundations** - Investing in the infrastructure will improve productivity across the Council with custom built spaces to suit the service area needs.	This proposal aligns with the Council's Borough Plan – the provision and supply of good quality accommodation for organisations impacts on all priorities.	The project would help fulfil the statutory obligations of health and safety in respect of the Council's landlord responsibilities, as well as supporting the accurate reporting of property values for statutory accounting purposes which relies on accurate stock condition information.	None identified. There are risks in not carrying out the project as mentioned in the main body of the report.	None	Economic and social changes are having an impact on supply and demand for properties i.e. increasing demand from all sections of the community.	1
PL053	Re-Development of Ealing Road Library ***NEW***	HCIB	**New Council Homes Programme:** To create 23 new homes for residents and improve our library building assets, modernising their design, extending their offer to residents and visitors, and protecting their status as anchor sites in their communities and high streets. The proposal is to demolish the existing library and rebuild a new Library on the ground floor and a 5 Storey block of residential flats consisting of 6x3bed flats, 14x 2bed flats and 3x1 bed flats. The library to be provided will be 590m2 and the café 65m2. The development will refrain from building on the wildlife corridor at the back of the site as recommended by the planners.	8.2	CIL, S106, Libraries Improvement Fund	Jun-23	**Strong Foundations** - Building services around residents and their needs. **A Future Built For Everyone, An Economy Fit For All** - Increase in housing supply; reduction in number of households in temporary accommodation.	Borough Plan 2021-2022 Housing Asset Management Strategy 2020-2025	A library service is a statutory provision and these buildings form part of Brent current operational footprint of providing that service.	Increasing costs associated with construction, shortage of material and labour.	Long term savings to the Temporary Accommodation service through additional housing supply for residents.	Growing population in Alperton and increasing residential demand for community facilities.	4
Corporate Landlord Total				78.5									
Housing Care Investment Board													
PL012	St Raphael's estate	HCIB	**Mixed Development:** Brent's 2014-2019 Housing Strategy explains that St Raphael's is also expected to deliver new supply alongside improvement or replacement of existing stock and the public realm. There is the opportunity to fundamentally change the area, with proposed improvements to housing and local infrastructure which, depending on whether infill or redevelopment are progressed, could help to improve the economic, social and environmental conditions in the Borough. The significant viability gap for redevelopment necessitated the delivery of infill. No ballot was required. This infill programme has been paused due to the viability challenges with a look to review viability in 2023/24.	100.0	AHP Grant	TBC	**A Future Built for Everyone, An Economy Fit for All** - increase and improvement in housing supply and reduction in number of households in temporary accommodation. **Strong Foundations** - there was an increase in resident involvement ahead of the decision between redevelopment or infill.	Borough Plan 2021-2022 Brent Climate & Ecological Emergency Strategy 2021-2030 Poverty Commission Housing Asset Management Strategy 2020-2025	St Raphs development will provide the following statutory provision: - Housing for families in Brent	1. Subject to planning permission 2. Cost of development - prices have increased following pandemic 3. Possibility of residents objecting proposals	Schemes - partially funded by GLA. This assumes a reasonable cost to build, however if development prices increase, viability will be challenged.	The provision of affordable housing is linked to the future need highlighted by housing waiting list.	4
PL044	New Council Homes Programme	HCIB	**New Council Homes Programme:** The Council submitted a bid for GLA grant funding to support delivery of a further 701 new social rented homes in April 2021 as part of the GLA's Affordable Homes Programme 2021-2026. The Councils bid was based upon each project breaking even by the expiry of 60 years from practical completion. The total grant allocated was £111 million. The total scheme costs to deliver 701 new homes has now been estimated at £281m (net £170m up from £125m) based on benchmarking data from November 2022.	281.0	AHP Grant	Ongoing	**A Future Built for Everyone, An Economy Fit for All** - increase and improvement in housing supply; reduction in number of households in temporary accommodation or homeless in the borough. **Strong Foundations** - there is an increase in resident involvement ahead of all new developments	Borough Plan 2021-2022 Brent Climate & Ecological Emergency Strategy 2021-2030 Housing Asset Management Strategy 2020-2025 Homelessness and Rough Sleeping Strategy 2020-2025	NCHP will provide the following statutory provision: - Housing for families in need in Brent	1. Subject to planning permission 2. Cost of development - prices have increased following pandemic 3. Possibility of residents objecting proposals 4. Availability of sites	Schemes - partially funded by GLA. This assumes a reasonable cost to build, however if development prices increase, viability will be challenged.	The provision of affordable housing is linked to the future need highlighted by housing waiting list.	4
PL052	Kingsbury Library Redevelopment ***NEW***	HCIB	**New Council Homes Programme:** This proposal seeks to create 60 homes for residents and improve our library building assets, modernising their design, extending their offer to residents and visitors, and protecting their status as anchor sites in their communities and high streets. This proposal focusses on Westcroft Court, which presents opportunities to develop and enhance facilities in the current location and align with growth areas.	22.2	CIL, S106, Libraries Improvement Fund	Jun-23	**Strong Foundations** - Building services around residents and their needs. **A Future Built For Everyone, An Economy Fit For All** - Increase in housing supply; reduction in number of households in temporary accommodation.	Borough Plan 2021-2022 Housing Asset Management Strategy 2020-2025	A library service is a statutory provision and these buildings form part of Brent current operational footprint of providing that service.	Need to acquire 17 leaseholder buybacks to secure site possession. Increasing costs associated with construction, shortage of material and labour.	Long term savings to the Temporary Accommodation service through additional housing supply for residents.	Growing population in Kingsbury and increasing residential demand for community facilities.	4

PL054	Kilburn Library Development ***NEW***	Corporate Landlord	**Libraries Development Plan:** The Kilburn Library project seeks to transform the relationship between the Library and the South Kilburn community, increasing participation and take up of the library offer by local residents and creating a sense of belonging and ownership amongst the community to support the longer-term development of services.	0.7	SCIL, Libraries Improvement Fund	May-23	**Strong Foundations** - Investing in the infrastructure will improve productivity across the Council with custom built spaces to suit the service area needs.	Borough Plan 2021-2022	A library service is a statutory provision and these buildings form part of Brent current operational footprint of providing that service.	Arts Council bid is un-successful	We anticipate there will be indirect savings generated through the outcomes of these aims in improved health, employment and community cohesion.	Growing population in the borough requires additional better quality facilities.	2
Housing Care Investment Board Total				403.9									
Public Realm													
PL016	Kensal Rise priority bus Scheme	Public Realm	**Corridors:** Bus Priority funded improvements to the Chamberlayne Corridor to include Traffic and Parking management, wider pavements, greening, new bus shelters, cycling and walking improvements near Kensal Rise Station and on Kilburn Lane and Chamberlayne Road. Circa £1.2M has been secured to deliver improvements around Kensal Overground Station. **Status 27/10/21** Work is progressing around Kensal Overground Station. TfL have experienced severe financial difficulties and the £0.3M contribution from the LIP programme has not been secured for 2021/22. TfL have committed to allocating funding but this is dependent on negotiations with the Department for Transport for funding beyond 11 December 2021. The project is to be delivered in phases in future years using TfL LIP and Bus Priority funding.	n/a	TBC	TBC	**A Borough where we can all feel safe, secure, happy and healthy -** provision of public realm improvements including, new pavements, trees and greening, new pedestrian crossing points including 2 signal crossings, cycling amenities, will encourage active and sustainable travel. Active travel helps to improve the health of Brent Residents and reduce health inequalities. **A future built for everyone, an economy fit for all -** new signal junctions within the scheme will be designed to keep traffic moving on our roads and pavements will be improved. **A cleaner more considerate Brent -** improved walking and cycling facilities, accessibility to bus services and reduced bus journey times contribute to reduced car use reducing carbon emissions from transport and improving air quality.	Borough Plan 2021-2022, Brent Long Term Transport Strategy 2015-2035, Brent's Third Local Implementation Plan 2019-2041, Brent Climate & Ecological Emergency Strategy 2021-2030	The Greater London Authority Act 1999 ("the GLA Act") requires that in exercising any function, London local authorities must have regard to the Mayor's Transport Strategy which sets out the transport policy framework for London.	1. Traffic Signal installation by TfL's signals team 2. Implementation of future phases of the scheme is dependant on TfL funding through the LIP and Bus Priority programmes.	The scheme will be funded through future TfL LIP and Bus priority programmes. There is no specific financial return but road traffic injury accidents and poor public health result in significant costs to the UK economy. Creating a high quality public realm will attract visitors and support the local economy.	Improvements on the Kensal Corridor were developed in partnership with local residents groups and business association from 2016. The scheme will remove a double looping bus movement to improve bus journey times and bus accessibility. The public realm improvements will also improve road safety, encourage sustainable travel and visitor to the area, which will support the local economy.	2
PL046	Barham Park	Public Realm	**Improvements to Barham Park:** There is a need to improve the buildings and landscaped grounds at Barham Park. Funding required for a strategic review and the refurbishment of the Barham Park Estate, estimated at £3m **Status 17/11/22:** We are awaiting the completion of a surveyor-led review of the building which will inform intended works. The spread of expenditure for the years of the programme will be clearer after the review.	3.0	SCIL, S106, Council capital - TBC	Mar-24	**Strong foundations -** improved building and grounds at this community hub will encourage visitors and participation, support community cohesion and increased resident satisfaction **A Borough where we can all feel safe, secure, happy and healthy** - provision of community space and attractive grounds encourage visitors, walking and supports the health of Brent Residents and reduce health inequalities.	Borough Plan 2021-2022, Brent Climate & Ecological Emergency Strategy 2021-2030	Local authorities in England have a statutory duty to provide a range of services to their communities.	1. Dependant on a strategic review of existing facilities and identifying improvements to the building and grounds.	The capital investment is necessary to maintain the building and grounds for continued use as important community space, retaining income to the Barham Park Trust for which the Council is the sole trustee.	Barham Park is an important community hub providing a range of services and recreational activities. There is a growing need for the renovation of the building and grounds to address deterioration, reduce energy costs, and the risk of a loss of tenants including the ACAVA charity, Barham Community Library, the Veterans Club, Tmu Samaj and the Children's Centre.	2
PL02	Wembley Hill Road/ Park Lane / Wembley Park Drive - Signal Junction Improvements	Public Realm	**Traffic Management Improvement:** Provision of pedestrian phases and enhanced pedestrian crossing facilities at a 5-arm signal junction with a poor safety record in the close vicinity of the Wembley Regeneration area. There is need to improve safety and accessibility due to increased traffic volumes and pedestrians visiting the area. Options for improving pedestrian safety at this junction and traffic modelling have been completed. The proposals have been subject to consultation and implementation is planned for early 2022. **Status 16/11/22:** TfL funding agreed, awaiting estimates. Work programmed for April 2023.	TBC	SCIL, S106, TfL - TBC	Jan-23	**A Borough where we can all feel safe, secure, happy and healthy -** provision of safe pedestrian crossing points at this signal junction will encourage walking / sustainable travel. Active travel helps to improve the health of Brent Residents and reduce health inequalities. **A future built for everyone, an economy fit for all** - the new signal junction will be designed to keep traffic moving on our roads and pavements at the junction will be improved. **A cleaner more considerate Brent -** improved walking facilities contribute to reduced car use reducing carbon emissions from transport and improving air quality.	Borough Plan 2021-2022, Brent Long Term Transport Strategy 2015-2035, Brent's Third Local Implementation Plan 2019-2041, Brent Climate & Ecological Emergency Strategy 2021-2030	The Greater London Authority Act 1999 ("the GLA Act") requires that in exercising any function, London local authorities must have regard to the Mayor's Transport Strategy which sets out the transport policy framework for London.	1. Traffic modelling subject to approval by Transport for London (TfL) 2. Traffic Signal installation by TfL's signals team	The scheme is partly funded by TfL but we are awaiting confirmation to programme implementation. There is no specific financial return but road traffic injury accidents result in significant costs to the UK economy.	The junction is on a main route to the Wembley Regeneration area, Brent Civic Centre, the London Designer Outlet, Wembley Stadium, Wembley Arena, and local train stations and bus routes.	1
PL045	Redefining Local Services (RLS) Depot Refurbishment Programme ***NEW***	Public Realm	**Depot Improvement Works:** The Public Realm Contract let to Veolia in April 2014 is due to expire in March 2023. A tendering exercise is in progress to identify new providers under two separate, specialist contracts - the Integrated Street Cleansing, Waste Collections and Winter Maintenance contract (The Integrated Contract) and the Grounds Maintenance Services contract (GM). In March 2022, we received an estimated cost from Watts Consulting for the refurbishment required to the 11 depot sites in advance of new providers taking occupation in April 2023. The works categories comprise a varying mix of external, internal, mechanical, electrical, and land and boundaries at each site, ranging from a total of £3.5k at Roe Green to £229k at Unit 2 Marsh Rd.	0.7	Council Capital	TBC	**A cleaner more considerate Brent.**	The aim of Redefining Local Services programme is to design and implement a better, more integrated and flexible local services delivery model that improves the look and feel of Brent's public realm.	Statutory compliance checks.	1) A 10% contingency has been added to the works budget. 2) Incumbent contractor to contribute towards work costs through the reclaiming of dilapidation.	Future savings through the reduction in reactive maintenance and structural repairs.	Not applicable.	1
PL020	Sports Programme	Public Realm	**Green spaces**: Improvement works to a range of grounds (including football, cricket and rugby) and their facilities, feasibility studies and longer-term improvement works. An evaluation of existing pitches has confirmed that the service will be seeking to provide a business case for the remainder of the funding in the next financial year. **Status 17/11/22 :** Sports pitches: Gladstone Park: We are currently working on investigations, seeking consents and then the design for the drainage. The main part of the works for Gladstone Park are now more likely in 2023/24 and onwards. John Billam / Tenterden Sports Pitches: We are awaiting decisions by external partners and whether a drainage consent is achievable.	1.1	Borrowing	May-23	**A Borough where we can all feel safe, secure, happy and healthy -** provision of high quality sports facilities encourages physical activities and helps to improve the health of Brent's residents and reduce health inequalities. **Strong foundations** - improved sports facilities will increase resident participation in activities, support community cohesion and increased resident satisfaction.	Borough Plan 2021-2022, The Planning for Sport and Active Recreation Facilities Strategy 2008-2021	Local authorities in England have a statutory duty to provide a range of services to their communities.	1. Dependant on a feasibility study and business case identifying priorities and costs	The provision of improved sports facilities will result in an increase in activities and revenue generated from charges, which will be detailed in the business case.	Brent has a growing population and demands will increase in future years.	1

PL055	Mortuary Expansion ***NEW***	Public Realm	An expansion of the mortuary building to provide additional fridge and freezer capacity in order to meeting increased demand and to satisfy obligations with respect to the Human Tissue Authority.	1.8	Borrowing	Apr-23	**A future built for everyone** - Investing in the bereavement and mortuary infrastructure will cater for increased demand arising from a growing population to provide sustained additional capacity to manage periods of peak demand	Borough Plan Brent-climate - ecological-emergency-strategy-2021-2030	The Human Tissue Act 2004 regulates the removal, storage and use of human tissue. The Act is regulated by the Human Tissue Authority (HTA) who license Brent's mortuary for the following activities – Making of a Post Mortem Examination Removal of Relevant Material Storage of a Body or Relevant Material	Without investment in an expanded mortuary the council may be unable to meet increased demand for body storage and be in default with respect to its licensed activities.	The capital costs would be shared by the IAA partners, or could be solely met by Brent and recharged to the partners over the term of the IAA	Since the pandemic and during winter periods there is an increase in storage demand, and this is et to increase further in line with local population increase.	4
PL056	Wembley High Road – Carriageway reconstruction ***NEW***	Public Realm	Wembley High Road Carriageway Reconstruction – Structural investigations, due to be completed in mid-February 2023, have been commissioned to identify structural issues with the carriageway build-up that is causing accelerated deterioration of the road surface. The study will identify the underlying issue and propose options for remedial measures. Early indications indicate moisture in the carriageway structure and below, which is most likely from natural sources (water table). The estimate for remedial measures will be confirmed once we have confirmation of the issue and options to resolve.	TBC	TBC	Apr-23	**A Future built for everyone, and economy fit for all** - Going Places Keep our roads in good repair **A Future built for everyone, and economy fit for all** - A Great Place to do Good Work Invest in Brent's Town Centres to reverse decline and support diversification, employment and enterprise. **A Future built for everyone, and economy fit for all** - Getting Regeneration Right Ensure the right social, environmental and physical infrastructure is in place to support new development and growth	Borough Plan	Section 41 of the Highways Act 1980 places a duty on the council as highways authority to maintain the public highway. Breach of this duty can render the council liable to pay compensation if anyone is injured as a result of failure to maintain the highway. There is also a general power under section 62 of the Highways Act 1980 to improve highways.	The carriageway is deteriorating rapidly with sections cracking, sinking and multiple potholes developing. "Make safe" repairs are only lasting a limited period and sections of the road is at risk of having to be closed if the surface deteriorates to a state where it is considered unfit for traffic. This will create widespread disruption throughout the area, which will increase further on Wembley Event days.	1.Avoidance of risk of claims 2.Economic damage due to road closures causing disruption and congestion. 3.Impact on Highways maintenance revenue budget through continuous make safe repairs.	None	2
PL057	Green Corridor Infrastructure Improvements in the two Green Neighbourhoods ***NEW***	Public Realm	Green Corridor Infrastructure Improvements in the two Green Neighbourhoods: The council is taking a progressive and pioneering approach to tackling the climate and ecological emergency through the delivery of several Green Neighbourhood pilots (the first phase being Church End & Roundwood; and Kingsbury). Distinct overall 'visions' have emerged for the approach in these two pilot areas. In Church End and Roundwood in particular, there is significant potential for developing an area-wide focus on 'Green Corridors' to promote the healthy streets agenda, enhancing and linking green and active infrastructure. This CPB bid would therefore be implemented via an integrated approach from Parks and Healthy Streets. The council is in the process of putting together a comprehensive brief for consultants to assess and cost the physical infrastructure required in these localities, but we are likely to need capital investment in order to make turn this feasibility study into a reality on the ground.	1.5	Borrowing	Apr-23	**A Cleaner, More Considerate Brent** This investment will boost the council's current flagship climate programme (the Green Neighbourhoods) and will contribute to the desired borough plan outcomes of both: 'considerable and measurable progress made in the borough's journey to reaching net zero carbon emissions' and 'promote a cleaner more attractive borough, improving biodiversity in our streets and parks, through greening and sustainability projects including tree planting and the development of new and different habitats'	Brent Borough Plan 2023-2027 Brent Climate & Ecological Emergency Strategy 2021-2030 Brent Long Term Transport Strategy 2015-2035 Brent's Third Local Implementation Plan 2019-2041	The Climate Change Act 2008 (the Act) is the statutory basis for the UK's approach to tackling and responding to climate change. The Act places a legal duty on central government to set legally binding targets to reduce UK greenhouse gas emissions to net-zero by 2050 The Greater London Authority Act 1999 ("the GLA Act") requires that in exercising any function, London local authorities must have regard to the Mayor's Transport Strategy which sets out the transport policy framework for London.	There is a risk to the council achieving its aspirations to become a carbon neutral borough if its flagship pilot programme does not have sufficient financial support to be implemented. Schemes should be developed and implemented alongside the community wherever possible, to minimise risk of public opposition. Identified climate risk specific to Brent is set out in more detail in our Climate Adaptation and Resilience Plan, this includes a risk assessment public health, infrastructure and the natural environment in Brent.	There is no specific financial return the risk posed by climate change and poor public health result in significant costs to the UK economy. The programme will support the wider Council objectives to encourage sustainable travel, improve air quality, the local economy and community health and general well-being.	The Green Corridors element of the Green Neighbourhoods programme seeks to build on our existing Transport for London LIP funded corridors and neighbourhoods improvements programme, with the aim of improving people's health and wellbeing and facilitating social inclusion. The focus will be on delivering comprehensive, 'high impact' schemes, implemented over wider areas to address multiple issues and bring about a greater range of benefits to more people.	2
PL058	Parks Infrastructure Improvements ***NEW***	Public Realm	A large number of pathways in parks are failing; with edging falling away and tree root incursion. These are a health and safety issue requiring investment At least two of our pavilions are suffering from high deterioration internally, meaning that we cannot rent or use them and gain any income. The aviary at Roundwood has subsidence and requires structural repair and the toilets at Roundwood require a complete redesign and rebuild.	2.0	Borrowing	Mar-23	**A Cleaner More Considerate Brent** - This investment will help make our parks more sustainable for the increase in use **A future built for everyone** - Investing in the infrastructure will allow for sustained visitor numbers to our open spaces	Borough Plan Brent-climate - ecological-emergency-strategy-2021-2030	None	1)Without investment our pathways become heath and safety risks for visitors leading to increased insurance claims for trips and falls and closure of pathways that cannot be used. There is no other source of funding for this kind of infrastructure. 2)The toilet block in Roundwood is one of the few remining in our parks and if there is no investment, we will have to close these leading to high levels of complaints and public dissatisfaction. 3) The internal stairs and upstairs floor at the pavilion in Vale Farm are disintegrating, creating a health and safety risk and putting the structure of the building at risk.	There is a possibility to consider an invest to save option with the pavilion repairs, as an improved, safe building provides for opportunities for it to be hired and bring in revenue.	Since the pandemic and with high levels of flatted developments, there is an increase in visitor numbers to our parks, leading to increased wear and tear.	2
Public Realm Total				10.1									
Regeneration													
			Housing Zone: Infrastructure improvements to improve east - west connectivity, and to improve the quality of parks and open spaces to support housing zone growth.						The local authority is required to				

PL03	Alperton Housing Zone Infrastructure Requirements	Regeneration	1. Improvement to Woodside End highway linking Suneigh Rd to Abbey Industrial estate/redevelopment (E-W connectivity), and Atlip Rd public realm 2. Parks and open spaces.	0.8	SCIL	Mar-23	**A Future Built for Everyone, An Economy Fit for All -** connectivity improvements across the Alperton growth area will enable residents to better access transport, shops and services, and job opportunities particularly in Park Royal.	Draft Local Plan Draft long term transport strategy Borough Plan	The local authority is required to have a spatial plan for the area. Once adopted, the Local Plan is part of the statutory development plan and these works are required to implement the strategy for Alperton	Subject to planning permission and potentially some CPOs.	Works should be SCIL eligible as infrastructure in a growth area ; the developments in the area have contributed many millions of CIL to the Council.	Over the period of growth the population of Alperton is likely to increase by around 6,000 new homes	3
PL031	Neasden Connectivity and Place Making Improvements	Regeneration	**Strategic Transport:** The proposal is to improve the character and connections around the A406, between east and west Neasden, by improving the entrances to the subway to create a pleasant and more inviting environment for pedestrians and cyclists. The work will open out and extending the approaches to the subway; environmental treatment to the extended approaches; upgrade to the subway for lighting, surface, walls and ceiling.	3.1	SCIL, S106, TfL - TBC	Nov-23	**A Future Built for Everyone, An Economy Fit for All** - to improve connectivity within Neasden currently cut in half by the NCR. Harsh environment. Encourage pedestrian and cycling use. **A Borough where we can feel safe, secure, happy and healthy**	Borough Plan Draft Long Term Transport Strategy Draft Local Plan	None	Price inflation/materials	None directly; would be SCIL eligible	Once Neasden Growth Area gets into delivery, population of Neasden will increase	2
PL025	Improvements to Underpass from Monk Park to Wembley Park	Regeneration	**Accessibility Improvements:** To enhance pedestrian and cycling access across the Chiltern Line to improve accessibility between Monks Park and Wembley Park.	1.0	SCIL	Apr-23	**A Future Built for Everyone, An Economy Fit for All**	Borough Plan	None	Implementable measures may not make a significant improvement	None directly	None	1
Regeneration Total				4.9									
Schools													
PL049	Gordon Brown OEC Independent Life Skills Project ***NEW***	Schools	**Independent Life Skills Project:** To create a new purpose built building at the Gordon Brown Outdoor Education Centre to provide independent life skills sessions to young people in Brent. The centre will provide young people with independent life skills to support them to move into their own tenancies quicker which reduces the financial pressure on CYP. It is anticipated that the savings this project will produce will be adequate to cover the capital borrowing costs.	3.6	Council Capital	Apr-23	**Every Opportunity to Succeed** - Increased opportunities for children and young people to succeed. **A borough where we can all feel safe, secure, happy and healthy:** Support our most vulnerable adults, enabling them to choose and control the services they receive, to remain independent and lead active lives	This project also aligns with the Care Leavers Charter and Young Peoples Promise.	Under the Children Act 1989, social care services have a duty to prepare young people for leaving care. This includes supporting young people into adulthood and supporting those who have left care up to their 25th birthday	Lack of capacity on workshops for all eligible young people - Work with TMS to ensure they are clear on the programme, its requirements and expected outcomes.	None directly	No. of young people over the age of 18 in semi-independent accommodation is increasing each year and therefore the associated costs to house them in this accommodation is to increase. In 2018 there were 50 young people in semi-independent accommodation and in 2022 there is 150	4
PL050	Children's Care Home Project ***NEW***	Schools	**Children's Care Home Project:** The project will develop a four bed residential step-down home within Brent for looked after adolescents with social, emotional and behavioural needs. The home will be set within a continuum of care pathways, providing step-down provision that prepares young people, who are in residential settings away from the borough or in a crisis setting, for a move into a local fostering placement, supported accommodation (if 16+) or return home.	2.2	DfE Children's Homes Capital Fund Lot 2, Council Capital	Apr-23	**Every Opportunity to Succeed** - Increased opportunities for children and young people to succeed.	A residential home within Brent would reduce the amount of time social work staff and other professionals need to travel to see children and young people. It will also contribute to the council-wide focus on transitional safeguarding as a range of services within Brent will be able to support them locally.	Having a children's residential home run by Brent Council even directly or via a commissioned provider supports the LA in delivering a range of statutory duties as laid down the Children Act 1989, the Children Act 2004, the Children Leaving Care Act 2000 and the Children and Social Work Act 2017.	Costs of project over assigned budget - Ensure designs/specs and methodologies are financially analysed before issuing to market.	The proposed residential home model would generate an estimated annual cost avoidance saving of at least £150K and up to £500K a year against the children's placement budget	Currently it is very difficult to find step-down provision for the cohort in residential provision who are aged 16 and above and when they transition to living in semi-independent provision they often require additional support.	4
PL048	Post-16 Skills Resource Centre & SEND School Expansion ***NEW***	Schools	**Post-16 Skills Resource Centre**- To develop a post-16 resource centre at Airco Close and horticultural centre at Welsh Harp to support young people aged 16 – 25 with SEND.	16	SCIL, Basic Need	Apr-23	**Every Opportunity to Succeed** - supporting the continued development of young people by providing new skill opportunities for them to succeed.	The Brent SEND Strategy 2021-2025 The Brent Youth Strategy 2021-2023	The Children and Families Act 2014 introduced a new legislative framework for children and young people aged 0-25 with SEND.. The reforms aimed to increase protection for young people with SEND and to promote a greater focus on outcomes and preparing for adulthood.	Increasing inflation costs and its impact on the construction industry (resources, materials, deliveries)	None directly	The School Place Planning Strategy Refresh, agreed by Cabinet in November 2021, evidences the growing demand for places that meet the needs of children and young people with SEND. The rationale for a Post 16 Skills Resource Centre is supported by the changing demography, with increasing numbers of young people with SEND.	4
Schools Total				21.8									
South Kilburn Regeneration													
PL026	South Kilburn Schools	South Kilburn Regeneration	**South Kilburn Regeneration:** Provision of sufficient school places for both primary and nursery children; new school building in Austen/Blake redevelopment, part of the masterplan. Notes: Linked to Open Space project above; schools now in agreement. Design works in progress for Austen/Blake and new school building.	5.6	SCIL	Jun-23	**A Future Built for Everyone, an economy fit for all** **Every opportunity to succeed** - part of the masterplan for the area to improve the existing school provision	Borough Plan South Kilburn masterplan SPD South Kilburn Landlord Offer Draft Local plan	Statutory requirement to provide a spatial strategy for the area. Once adopted the Local Plan will become part of the statutory development plan	Procurement of a contractor. Agreeing design with schools	None directly. School element would be SCIL eligible.	Increasing population in the area; landlord offer was on basis of the masterplan	4
PL013	Open Spaces and public realm improvements (e.g. NWCC, Carlton Vale Boulevard)	South Kilburn Regeneration	**South Kilburn Regeneration:** Delivering high quality open spaces across the area, including on site of existing schools. In addition, improved connectivity through the masterplan area, and improved local infrastructure including Carlton Vale Boulevard. NWCC public realm contribution from SIL (£4.9m) agreed by Cabinet April 2021.	6.8	SCIL	Apr-23	**A Future Built for Everyone, an economy fit for all** - part of the estate regeneration masterplan	Borough Plan South Kilburn masterplan SPD South Kilburn Landlord Offer Draft Local plan	Statutory requirement to provide a spatial strategy for the area. Once adopted the Local Plan will become part of the statutory development plan	Procurement of a contractor	None directly SCIL eligible.	Increasing population in the area; landlord offer was on basis of the masterplan.	2
South Kilburn Regeneration Total				12.4									
Grand Total				531.6									

Priority Ranking: 5 = high priority and 1 = low priority

Appendix G

Capital Strategy Report 2023/24

1.0 Introduction

1.1 This Capital Strategy Report gives a high-level overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of local public services along with an overview of how associated risk is managed and the implications for future financial sustainability. It has been written in an accessible style to enhance members' understanding of these sometimes technical areas.

1.2 Decisions made this year on capital and treasury management will have financial consequences for the Council for many years into the future. They are therefore subject to both a national regulatory framework and to local policy framework, summarised in this report.

2.0 Capital Expenditure and Financing

2.1 Capital expenditure is where the Council spends money on assets, such as property, vehicles or other assets that will be used for more than one year. In local government this includes spending on assets owned by other bodies, and loans and grants to other bodies enabling them to buy assets. The Council has some limited discretion on what counts as capital expenditure, for example assets costing below £5,000 are generally not capitalised and are charged to revenue in year. Details of the Council's policy on capitalisation is set out in the annual Statement of Accounts.

2.2 In 2023/24, the Council is planning capital expenditure of £461.4m as summarised below:

Table 1: Prudential Indicator: Estimates of Capital Expenditure in £ millions

£M	2022/23 forecast	2023/24 budget	2024/25 budget	2025/26 budget	2026/27 budget	2027/28 budget
General Fund services	173.0	304.4	213.8	85.7	41.0	42.0
Council housing (HRA)	59.4	156.9	113.3	37.0	22.6	-
Capital investments	-	-	-	-	-	-
TOTAL	**232.4**	**461.4**	**327.1**	**122.7**	**63.7**	**42.0**

2.3 The Capital Programme comprises of projects approved by Cabinet from previous year budget setting, new projects approved in year and being brought forward including those promoted from the pipeline provision.

2.4 The main General Fund capital projects include the new Council Homes Programme £143.2m, i4B Street Properties Purchase £58.2m, NAIL (Supported Living) £18.1m and Morland Gardens Regeneration £43.5m. The Council also plans to incur capital expenditure on investments, which are discussed in more detail within the Investment Strategy for 2023/24.

2.5 The Housing Revenue Account (HRA) is a ring-fenced account which ensures that council housing does not subsidise, or is itself subsidised, by other local services. HRA capital expenditure is therefore recorded separately, and includes the building of new homes as well as expenditure on improving and maintaining council homes over the planning period.

2.6 Capital investments include loans and shares made for service purposes and property to be held primarily for financial return in line with the definition in the CIPFA Treasury Management Code.

2.7 **Governance:** Full details of the Council's capital programme, including the project appraisals undertaken can be found within the capital programme and capital pipeline proposals 2023/24 presented to Cabinet in February 2023.

2.8 All capital expenditure must be financed, either from external sources (government grants and other contributions), the Council's own resources (revenue, reserves and capital receipts) or debt (borrowing, leasing and Private Finance Initiative). The planned financing of the above expenditure is as follows:

Table 2: Capital financing in £ millions

£M	2022/23 forecast	2023/24 budget	2024/25 budget	2025/26 budget	2026/27 budget	2027/28 budget
External resources	56.2	124.1	39.2	20.4	0.0	0.0
Revenue resources	34.3	60.6	57.8	30.6	11.4	7.1
Debt	141.9	276.6	230.1	71.8	52.3	34.9
TOTAL	**232.4**	**364.8**	**327.1**	**122.7**	**63.7**	**42.0**

2.9 Excluding external grants and other resources most assets are funded from debt. As with any debt, it must be repaid over time, and for a local authority there is a statutory requirement to set aside "minimum revenue provision" (MRP) in each year's budget for debt repayment. Planned MRP to 2026/27 is as set out in the table below.

Table 3: Replacement of debt finance in £ millions

£M	2022/23 forecast	2023/24 budget	2024/25 budget	2025/26 budget	2026/27 budget	2027/28 budget
MRP	13.6	13.3	15.8	18.1	20.5	21.6
TOTAL	**13.6**	**13.3**	**15.8**	**18.1**	**20.5**	**21.6**

2.10 The Council's full minimum revenue policy statement is presented as an Appendix to the annual Council Tax and Budget Setting Report.

2.11 The Council's cumulative outstanding amount of debt finance is measured by the capital financing requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP and capital receipts used to replace debt. The CFR is expected to increase to £1.3bn during 2023/24 and to over £1.6bn by 2026/27. Based on the above figures for expenditure and financing, the Council's estimated CFR is as follows:

Table 4: Prudential Indicator: Estimates of Capital Financing Requirement in £ millions

£M	2022/23 forecast	2023/24 budget	2024/25 budget	2025/26 budget	2026/27 budget	2027/28 budget
Opening CFR	997.3	1,125.6	1,389.0	1,603.3	1,657.0	1,688.7
Capital Expenditure	232.4	461.4	327.1	122.7	63.7	42.0
External resources	(56.2)	(124.1)	(39.2)	(20.4)	0.0	0.0
Own Resources	(34.3)	(60.6)	(57.8)	(30.6)	(11.4)	(7.1)
MRP	(13.6)	(13.3)	(15.8)	(18.1)	(20.5)	(21.6)
Closing CFR	**1,125.6**	**1,389.0**	**1,603.3**	**1,657.0**	**1,688.7**	**1,702.1**

3.0 Capital Programme Governance and Prioritisation

3.1 The capital programme is updated annually for new schemes, revised profiling, slippage and changes in expenditure projections. The capital programme and capital pipeline proposals 2023/24 – report (included elsewhere on this agenda) sets out the indicative capital programme that will be presented to Council in February 2023 as part of the annual budget setting cycle.

Pipeline Schemes

3.2 During the year the individual capital sub-boards (led by Operational Directors) developed a comprehensive list of opportunities and proposals for future aspirational capital investment to meet the council's strategic objectives. These outline bids are then collated by the PMO (Programme Management Office). For 2023/24 this process has culminated in the assimilation of c24 individual outline capital proposals with a total value of c480m and a spend profile spanning 2 to 5 years. At this stage these strategic pipeline schemes are only indicative and do not yet form part of the main programme as there is a requirement that individually they will still go through the normal approval routes (i.e. CMT/Cabinet/Council). Furthermore, officers will be required to produce detailed business cases, undertake feasibility and consult appropriately before getting to this stage.

Capital Programme Board

3.3 This Board is the main forum for reviewing the financial viability of the new capital bids and monitoring of existing programme. The Board reviews all capital investment and new opportunities, oversees and maintains the list of pipeline schemes and ensures outcomes are aligned with Council's aspirations and reflective of the circumstances within Brent. The board also ensures that all projects have a viable business case and that value for money (VfM) will be delivered for the Council.

Prioritisation criteria

3.4 The general criteria for scoring proposals are summarised below, higher scores were applied based on the following criterion:

- **Strategic Alignment** - How the scheme meets the outcomes of a key service objective as stated in a strategy document, business plan or action plan.
- **Statutory Obligations** - How the delivery of a scheme is essential to ensuring the Council meets the statutory need and without the project, the Council would otherwise be at risk of failing to meet.
- **Risk** - Whether the success of the project is dependent on mitigating high associated risks
- **Financial Return -** Whether the scheme generates ongoing revenue savings, a capital receipt or attract external funding (partial or fully).
- **Demand and Demographic Changes** - whether the scheme is required following a change in demographic, economic or social change that impact the borough and will reduce the demand for services in the borough.

4.0 Asset management

4.1 To ensure that capital assets continue to be of long-term use, the Council has a Housing Asset Management strategy in place and a Property Asset Management Strategy under review. The strategies provide a planning tool which ensures the assets are well managed and maintained in order to maximise the benefits for local residents.

5.0 Asset disposals

5.1 When a capital asset is no longer needed, it may be sold so that the proceeds, known as capital receipts, can be spent on new assets or to repay debt. The Council is currently also permitted to spend capital receipts on service transformation projects until 2023/24. Repayments of capital grants, loans and investments also generate capital receipts.

5.2 The Council plans to receive £7.1m of capital receipts in the current financial year. A significant proportion of these arise from asset disposals on the South Kilburn site as well as housing sold under the right to buy (RTB) scheme. The capital receipts expected in future financial years are as follows:

Table 5: Capital receipts in £ millions

£M	2022/23 forecast	2023/24 budget	2024/25 budget	2025/26 budget	2026/27 budget	2027/28 budget
Asset Sales	3.0	16.2	6.0	0.0	13.8	0.0
Loans Repaid	7.4	6.9	20.7	34.5	77.0	51.9
TOTAL	**10.4**	**23.1**	**26.7**	**34.5**	**90.8**	**51.9**

6.0 Treasury Management

6.1 Treasury management is concerned with keeping sufficient but not excessive cash available to meet the Council's spending needs, while managing the risks involved. Surplus cash is invested until required, while a shortage of cash will be met by borrowing, to avoid excessive credit balances or overdrafts in the bank current account.

6.2 The Council is typically cash rich in the short-term as revenue income is received before it is spent, but cash poor in the long-term as capital expenditure is incurred before being financed. The revenue cash surpluses are offset against capital cash shortfalls to reduce overall borrowing.

6.2 On 31st December 2022, the Authority held £761.9m of borrowing (£686.9m long term and £75.0m short term) at an average rate of 3.3% and £142.0m of investments at an average rate of 2.7%.

7.0 Borrowing strategy

7.1 The Council's main objectives when borrowing are to achieve a low but certain cost of finance while retaining flexibility should plans change in future. These objectives are often conflicting, and the Council therefore seeks to strike a balance between cheap short-term loans (currently available at around 3.5-4%) and long-term fixed rate loans where the future cost is known but higher (currently around 4.2-4.8%).

7.2 Projected levels of the Council's total outstanding debt (which comprises borrowing, PFI liabilities and leases are shown below, compared with the capital financing requirement (see above).

Table 6: Prudential Indicator: Gross Debt and the Capital Financing Requirement in £ millions

£M	2022/23 forecast	2023/24 budget	2024/25 budget	2025/26 budget	2026/27 budget	2027/28 budget
Debt (incl. PFI & leases)	700.5	689.0	726.6	716.9	707.5	697.7
Capital Financing Requirement	1,125.6	1,389.0	1,603.3	1,657.0	1,688.7	1,702.1

7.3 Statutory guidance prescribes that debt should remain below the capital financing requirement, except in the short-term. As can be seen from Table 6, the Council expects to comply with this regulation.

8.0 Affordable borrowing limit

8.1 The Council is legally obliged to set an affordable borrowing limit (also termed the authorised limit for external debt) each year. In line with statutory guidance, a lower "operational boundary" is also set as a warning level should debt approach the limit.

Table 7: Prudential Indicators: Authorised limit and operational boundary for external debt in £ millions

£M	2022/23 budget	2023/24 budget	2024/25 budget	2025/26 budget	2026/27 budget	2027/28 budget
Authorised Limit	1,400.0	1,700.0	1,800.0	1,800.0	1,900.0	2,000.0
Operational Boundary	1,200.0	1,500.0	1,600.0	1,600.0	1,700.0	1,800.0

8.3 Further details on borrowing are contained within the Council's treasury management strategy.

9.0 Investment strategy

9.1 Treasury investments balances arise from receiving cash before it is required to be paid out again. Investments made for service reasons or for pure financial gain are not generally considered to be part of treasury management.

9.2 The Council's policy on treasury investments is to prioritise security and liquidity over yield and to focus on minimising risk rather than maximising returns. Cash that is likely to be spent in the near term is invested securely, for example with the government, other local authorities or selected high-quality banks, to minimise the risk of loss. Money that will be held for longer terms is invested more widely, including in bonds, shares and property, to balance the risk of loss against the risk of receiving returns below inflation. Both near-term and longer-term investments may be held in pooled funds, where an external fund manager makes decisions on which particular investments to buy and the Council may request its money back at short notice.

Table 8: Treasury management investments in £millions

£M	2022/23 forecast	2023/24 budget	2024/25 budget	2025/26 budget	2026/27 budget	2027/28 budget
Short term investments	30.0	30.0	30.0	30.0	30.0	30.0
Long term investments	0.0	0.0	0.0	0.0	0.0	0.0

9.3 Further details on treasury investments are contained within the Council's treasury management strategy.

9.4 Risk management: The effective management and control of risk are prime objectives of the Council's treasury management activities. The treasury management strategy therefore sets out various indicators and limits to constrain the risk of unexpected losses.

9.5 Decisions on treasury management investment and borrowing are made daily and are therefore delegated to the Director of Finance, who must act in line with the treasury management strategy approved by Council. Reports on treasury management activity are presented to Cabinet and Full Council, whilst the Audit & Standards Advisory Committee is responsible for scrutinising treasury management decisions.

10.0 Investments for Service Purposes

10.1 The Council makes investments to assist local public services, including making loans to council subsidiaries to promote economic growth. In light of the public service objective, the Council is willing to take more risk than with treasury investments, however it still plans for such investments to break-even after all costs.

10.2 Decisions on service investments are either made by Cabinet or under delegated authority, or set down in the approved investment strategy. Most loans and shares are capital expenditure and purchases will therefore also be approved as part of the capital programme. Further details on service investments are contained within the investment strategy.

10.3 The proposed budget includes sums for investment in the Council's subsidiary i4B for the acquisition of street properties as part of the Council's temporary accommodation reform plan. These schemes aim to alleviate affordable housing pressures. A development finance loan to United College's Group to assist with cashflow pressures around their campus redevelopment has also been included.

11.0 Commercial Activities

11.1 The Council has previously invested in property locally to support regeneration whilst also securing a financial return. Total commercial investments are currently valued at £20.7m consisting of 40 individual property assets generating £3.1m PA, or a yield of 15%. Over time the use of these assets may change as new priorities are confirmed and assets are repurposed to contribute to the delivery of new strategic priorities.

Table 9: Property asset types and income generated in £millions

ASSET TYPES	No. of Assets	Value £M	Income PA £M
Operational	47	186.4	0.0
Commercial	40	20.7	3.1
Community Groups	63	28.3	0.0
Education	70	486.8	0.0
Regeneration	101	6.5	0.0
Non HRA Housing	533	280.5	0.0
TOTAL	**853**	**1,009.2**	**3.1**

11.2 With a higher financial return, the Council accepts higher risk on commercial investment than with treasury investments. The principal risk exposures include voids, diminution of capital values, etc. These risks are managed by the existing risk management framework. In order that commercial investments remain proportionate to the size of the authority they are under constant review and contingency plans are in place should expected yields not materialise. The Corporate Director for Finance and Resources is responsible for governance and due diligence on these investments.

12.0 Liabilities

12.1 In addition to debt of £700.5m detailed above, the Council is committed to making future payments to cover its pension fund deficit (valued at £163m – Report March 2022).

12.2 The Council will be making appropriate adjustments to its bad debt provision due to the impact of global pandemic on local businesses, residents and suppliers with more details to be provided in the 2022/23 statement of accounts.

13.0 Revenue Budget Implications

13.1 Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP payments are charged to revenue, offset by any investment income receivable. The net annual charge is known as financing costs; this is compared to the net revenue stream i.e. the amount funded from Council Tax, business rates and general government grants.

Table 10: Prudential Indicator: Proportion of net revenue stream to financing costs

£M	2022/23 forecast	2023/24 budget	2024/25 budget	2025/26 budget	2026/27 budget	2027/28 budget
Financing costs	36.5	57.3	78.5	101.8	109.7	112.1
Proportion of net revenue stream %	12.6%	18.7%	24.3%	31.0%	33.4%	34.1%

13.2 Due to the very long-term nature of capital expenditure and financing, the revenue budget implications of expenditure incurred in the next few years will extend for up to 50 years into the future. The detailed information contained within the treasury management strategy and the Budget & Council Tax Report 2023/24, as well as the prudential indicators included above demonstrates how this is prudent, affordable and sustainable.

14.0 Knowledge and Skills

14.1 The Council employs professionally qualified and experienced staff in senior positions with responsibility for making capital expenditure, borrowing and investment decisions. The Council also pays for junior staff to study towards relevant professional qualifications including CIPFA and AAT for example.

14.2 Where Council staff do not have the knowledge and skills required, use is made of external advisers and consultants that are specialists in their field. The Council currently employs Arlingclose Limited as treasury management advisers. This approach can be

more cost effective than employing such staff directly, and ensures that the Council has access to knowledge and skills commensurate with its risk appetite.

Investment Strategy Report 2023/24

Introduction

1. The Council invests its money for three broad purposes:

- because it has surplus cash as a result of its day-to-day activities, for example when income is received in advance of expenditure (known as **treasury management investments**);
- to support local public services by lending to or buying shares in other organisations (**service investments**); and
- to earn investment income (known as **commercial investments** where this is the main purpose).

2. This investment strategy meets the requirements of statutory guidance issued by the government in January 2018.

Treasury Management Investments

3. The Council typically receives its income in cash (e.g. from taxes and grants) before it pays for its expenditure in cash (e.g. through payroll and invoices). It also holds reserves for future expenditure and collects local taxes on behalf of other local authorities and central government. These activities, plus the timing of borrowing decisions, lead to a cash surplus which is invested in accordance with guidance from the Chartered Institute of Public Finance and Accountancy. The balance of treasury management investments is expected to fluctuate between £20m and £150m during the 2023/24 financial year.

4. The contribution that these investments make to the objectives of the Council is to support effective treasury management activities.

5. Full details of the Council's policies and its plan for treasury management investments are covered in a separate document, the Treasury Management Strategy 2023/24.

Service Investments: Loans

6. The Council lends money to its subsidiaries, statutory bodies, suppliers, local businesses, local charities and academies, housing associations, residents and its employees to support local public services and stimulate local economic growth.

7. An invest to save loan was given to the West London Waste Authority which is the statutory body responsible for waste disposal in a number of West London

boroughs. The funding assisted the development of a new waste treatment facility.

8. The Council's loan to First Wave Housing Limited has been used to support the provision of affordable accommodation and improve the provision of permanent housing as a registered provider. The loan to the Council's other subsidiary, i4B Holdings Ltd, has been used to purchase 521 properties as part of the Council's temporary accommodation reform plan.

9. The School Loan Scheme has helped support significant improvements to school facilities ensuring the buildings are suitable for modern teaching and learning and accessible for pupils with disabilities.

10. The Council is planning to provide a cashflow loan to United Colleges Group, to help facilitate the development of their new campus in Wembley.

11. The main risk when making service loans is that the borrower will be unable to repay the principal lent and/or the interest due. In order to limit this risk, and ensure that total exposure to service loans remains proportionate to the size of the Council, upper limits on the outstanding loans to each category of borrower have been set as follows:

Table 1: Loans for service purposes in £ millions

Category of borrower	2022/23 Forecast Balance owing	2023/24 Approved Limit
Subsidiaries	135.4	400.0
Local businesses	0.2	10.0
Schools, Academies and Colleges	0.7	55.0
Waste Authority	15.5	20.0
Local Charities	0.0	10.0
Housing Associations	0.0	50.0
Local Residents	0.0	5.0
TOTAL	**151.8**	**550.0**

12. Accounting standards require the Council to set aside loss allowance for loans, reflecting the likelihood of non-payment. The figures for loans in the Council's statement of accounts have been shown net of this loss allowance since 2019/20. However, the Council makes every reasonable effort to collect the full

sum lent and has appropriate credit control arrangements in place to recover overdue repayments. The loss allowance to date has been immaterial.

13. The Council assesses the risk of loss before entering into and whilst holding service loans by undertaking various financial checks and utilising specialists (where required) to advise on technical aspects of the investment. Projects funded by service loans are monitored within the Council's existing capital programme and governance reporting regime.

Commercial Investments: Property

14. The Council has previously invested in property locally to support regeneration as well as secure a financial return.

15. A fair value assessment of the Authority's investment property portfolio has been made within the past twelve months, and the underlying assets provide security for capital investment. Should the 2022/23 year end accounts preparation and audit process value these properties below their purchase cost, then an updated investment strategy will be presented to full council detailing the impact of the loss on the security of investments and any revenue consequences arising therefrom.

16. The Council assesses the risk of loss before entering into and whilst holding property investments by regularly reviewing investment performance.

17. Compared with other investment types, property is relatively difficult to sell and convert to cash at short notice and can take a considerable period to sell in certain market conditions. To ensure that the invested funds can be accessed when they are needed, for example to repay capital borrowed, the Council uses cashflow forecasting to assess when funding will be required and hold sufficient short term deposits which provide a liquidity buffer reducing the likelihood of any short notice investment property sales.

Table 2: Property held for investment purposes in £ millions

	Expected 2023/24			
Asset Types	**No. of Assets**	**Gain or (losses)**	**Value in accounts in £m**	**Income PA in £m**
Commercial	40	1.0	20.7	3.1

Other categories of investment

Loan Commitments and Financial Guarantees

18. Although not strictly counted as investments, since no money has exchanged hands yet, loan commitments and financial guarantees carry similar risks to the Council and are included here for completeness.

19. I4B currently has loans of £100.2m outstanding with the Council at varying rates of interest and maturity dates depending on the date of the initial loan draw down. A further £40m of loan finance was available as at the 31st of December 2022 with a further £17.7m of this forecast to be utilitised in the 2022/23 financial year. £18.4m is forecast to be utilised in 2023/24.

Capacity, skills and Culture

20. The Council employs professionally qualified and experienced staff in senior positions with responsibility for making recommendations and decisions on commercial activities. The Council pays for junior staff to study towards relevant professional qualifications including CIPFA and AAT.

21. Where Council staff do not have the knowledge and skills required, use is made of external advisers and consultants that are specialists in their field. The Council currently employs Arlingclose Limited as treasury management advisers. This approach can be more cost effective than employing such staff directly, and ensures that the Council has access to knowledge and skills commensurate with its risk appetite.

22. Our retained advisors provide a comprehensive training and awareness programme for elected Members, including training in relation to scrutiny of the Treasury Management function and the annual Statement of Accounts. The training programme covers, Local Government Finance, Corporate Governance, The Role of the Governance / Audit Committee and capital Programme Prioritisation.

23. The Council's treasury activity (including investments and borrowing) is reported to the Audit & Standards Advisory Committee and full Council twice a year via a mid-year report as well as the full year outturn report.

Investment Indicators

24. The Council has set the following quantitative indicators to allow elected members and the public to assess the Council's total risk exposure as a result of its investment decisions.

Total risk exposure

25. The first indicator shows the Council's total exposure to potential investment losses. This includes amounts the Council is contractually committed to lend but have yet to be drawn down and guarantees the Council has issued over third party loans.

Table 3: Total investment exposure in £millions

Total investment exposure	21/22 Actual	22/23 Forecast	23/24 Forecast
Treasury management investments	98.6	30.0	30.0
Service investments: Loans	151.8	154.5	172.1
Commercial investments: Property	20.7	20.7	20.7
TOTAL INVESTMENTS	**271.1**	**205.2**	**222.8**
Commitments to lend	72.2	52.1	32.9
TOTAL EXPOSURE	**343.3**	**257.3**	**255.7**

How investments are funded

26. Government guidance states that these indicators should include details of how investments are funded. Since the Council does not normally associate particular assets with particular liabilities, this guidance is difficult to comply with. However, the following investments could be described as being funded by borrowing. The remainder of the Council's investments are funded by usable reserves, grants and other income.

Table 4: Investments funded by borrowing in £millions

Investments funded by borrowing	21/22 Actual	22/23 Forecast	23/24 Forecast
Service investments: Loans	151.8	154.5	172.1
TOTAL FUNDED BY BORROWING	**151.8**	**154.5**	**172.1**

Rate of return

27. This indicator shows the investment income received less the associated costs, including the cost of borrowing where appropriate, as a proportion of the sum

initially invested. Note that due to the complex local government accounting framework, not all recorded gains and losses affect the revenue account in the year they are incurred.

Table 5: Investment rate of return (net of all costs)

Investments net rate of return	21/22 Actual	22/23 Forecast	23/24 Forecast
Treasury management investments	0.06%	3.1%	3.1%
Service investments: Loans	3.9%	3.9%	3.9%
Commercial investments: Property	6.4%	15.0%	15.0%

Table 6: Other investment indicators

Indicator	2021/22 Actual	2022/23 Forecast	2023/24 Forecast
Debt to net service expenditure ratio	2.27	2.22	2.09
Commercial income as a % of net service expenditure ratio	0.62%	1.01%	0.96%

Appendix I - Draft Treasury Management Strategy Statement 2023/24

Introduction

1.0 Treasury management is the management of the Council's cash flows, borrowing and investments, and the associated risks. The Council has borrowed and invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of financial risk are therefore central to the Council's prudent financial management.

2.0 Treasury risk management at the Authority is conducted within the framework of the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice 2021 Edition (the CIPFA Code) which requires the Authority to approve a treasury management strategy before the start of each financial year. This report fulfils the Authority's legal obligation under the Local Government Act 2003 to have regard to the CIPFA Code.

External Context

3.0 The ongoing impact on the UK from the war in Ukraine, together with higher inflation, higher interest rates, uncertain government policy, and a deteriorating economic outlook, will be major influences on the Authority's treasury management strategy for 2023/24.

4.0 The Bank of England (BoE) increased Bank Rate by 0.5% to 3.5% in December 2022. This followed a 0.75% rise in November which was the largest single rate hike since 1989 and the ninth successive rise since December 2021. The December decision was voted for by a 6 3 majority of the Monetary Policy Committee (MPC), with two dissenters voting for a no-change at 3% and one for a larger rise of 0.75%.

5.0 The November quarterly Monetary Policy Report (MPR) forecast a prolonged but shallow recession in the UK with CPI inflation remaining elevated at over 10% in the near-term. While the projected peak of inflation is lower than in the August report, due in part to the government's support package for household energy costs, inflation is expected remain higher for longer over the forecast horizon and the economic outlook remains weak, with unemployment projected to start rising.

6.0 The UK economy contracted by 0.3% between July and September 2022 according to the Office for National Statistics, and the BoE forecasts Gross Domestic Product (GDP) will decline 0.75% in the second half of the calendar year due to the squeeze on household income from higher energy costs and goods prices. Growth is then expected to continue to fall throughout 2023 and the first half of 2024.

7.0 CPI inflation is expected to peak at around 11% in the last calendar quarter of 2022 and then fall sharply to 1.4%, below the 2% target, in two years' time and to 0% in three years' time if Bank Rate follows the path implied by financial markets with a peak of 5.25%. However, the BoE has stated it considers this path to be too high, suggesting that the peak in interest rates will be lower, reducing the risk of

inflation falling too far below target. Market rates have fallen since the time of the November MPR.

8.0 The labour market remains tight for now, with the most recent statistics showing the unemployment rate was 3.7%. Earnings were up strongly in nominal terms by 6.1% for both total pay and for regular pay but factoring in inflation means real pay for both measures was -2.7%. Looking forward, the November MPR shows the labour market weakening in response to the deteriorating outlook for growth, leading to the unemployment rate rising to around 6.5% in 2025.

9.0 Interest rates have also been rising sharply in the US, with the Federal Reserve increasing the range on its key interest rate by 0.5% in December 2022 to 4.25%-4.5%. This rise follows four successive 0.75% rises in a pace of tightening that has seen rates increase from 0.25%-0.50% in March 2022. Annual inflation has been slowing in the US but remains above 7%. GDP grew at an annualised rate of 3.2% (revised up from 2.9%) between July and September 2022, but with official interest rates expected to rise even further in the coming months, a recession in the region is widely expected at some point during 2023.

10.0 Inflation rose consistently in the Euro Zone since the start of the year, hitting a peak annual rate of 10.6% in October 2022, before declining to 10.1% in November. Economic growth has been weakening with an upwardly revised expansion of 0.3% (from 0.2%) in the three months to September 2022. As with the UK and US, the European Central Bank has been on an interest rate tightening cycle, pushing up its three key interest rates by 0.50% in December, following two consecutive 0.75% rises, taking its main refinancing rate to 2.5% and deposit facility rate to 2.0%.

Credit outlook

11.0 Credit default swap (CDS) prices have followed an upward trend throughout the year, indicating higher credit risk. They have been boosted by the war in Ukraine, increasing economic and political uncertainty and a weaker global and UK outlook, but remain well below the levels seen at the beginning of the Covid-19 pandemic.

12.0 CDS price volatility has been higher in 2022 compared to 2021 and this year has seen a divergence in prices between ringfenced (retail) and non-ringfenced (investment) banking entities once again.

13.0 The weakening economic picture during 2022 led the credit rating agencies to reflect this in their assessment of the outlook for the UK sovereign as well as several local authorities and financial institutions, revising them from to negative from stable.

14.0 There are competing tensions in the banking sector which could impact bank balance sheet strength going forward. The weakening economic outlook and likely recessions in many regions increase the possibility of a deterioration in the quality of banks' assets, while higher interest rates provide a boost to net income and profitability.

Interest rate forecast

15.0 The Council's treasury management adviser Arlingclose is forecasting that the Bank Rate will continue to rise in 2022 and 2023 as the Bank of England attempts to subdue inflation which is significantly above its 2% target.

16.0 While interest rate expectations reduced during October and November 2022, multiple interest rate rises are still expected over the forecast horizon despite looming recession. Arlingclose expects Bank Rate to rise to 4.25% by June 2023 under its central case, with the risks in the near- and medium-term to the upside should inflation not evolve as the Bank forecasts and remains persistently higher.

17.0 Yields are expected to remain broadly at current levels over the medium-term, with 5-, 10- and 20-year gilt yields expected to average around 3.5%, 3.5%, and 3.85% respectively over the 3-year period to December 2025. The risks for short, medium and longer-term yields are judged to be broadly balanced over the forecast horizon. As ever, there will undoubtedly be short-term volatility due to economic and political uncertainty and events.

18.0 A more detailed economic and interest rate forecast provided by Arlingclose is in Appendix 1.

19.0 For the purpose of setting the budget, it has been assumed that new treasury investments will be made at an average rate of 3%, and that new long-term loans will be borrowed at an average rate of 4%.

Local Context

20.0 The Council's borrowing as at 31st December 2022 will be summarised in 21.0 below and detailed in Appendix 2 once available later this year.

21.0 At 31st December 2022, the Council held £761.9m of borrowing (£686.9m long term and £75.0m short term) and £142.0m of investments. This is set out in further detail at ***Appendix 2***. Forecast changes in these sums are shown in the balance sheet analysis in table 1 below.

22.0 Table 1: Balance sheet summary and forecast

	31.3.22	31.3.23	31.3.24	31.3.25	31.3.26	31.3.27
	Actual	Forecast	Forecast	Forecast	Forecast	Forecast
	£m	£m	£m	£m	£m	£m
Capital financing requirement	998.5	1,125.6	1,389.0	1,603.3	1,657.0	1,688.7
Other debt liabilities *	25.6	24.0	22.3	20.2	18.3	16.3
Loans CFR	**1,024.1**	**1,149.6**	**1,411.2**	**1,623.5**	**1,675.3**	**1,705.0**
External borrowing **	(684.6)	(681.7)	(618.3)	(609.9)	(601.6)	(593.3)
Internal (over) borrowing	**339.6**	**467.9**	**792.9**	**1,013.6**	**1,073.6**	**1,111.7**
Less: Balance Sheet resources	(438.2)	(438.2)	(438.2)	(438.2)	(438.2)	(438.2)

Treasury Investments (or New borrowing)	**98.6**	**(29.7)**	**(354.7)**	**(575.4)**	**(635.4)**	**(673.5)**

* leases and PFI liabilities that form part of the Authority's total debt
** shows only loans to which the Authority is committed and excludes optional refinancing

23.0 The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while usable reserves and working capital are the underlying resources available for investment. The Council's strategy has been to maintain borrowing and investments below their underlying levels, sometimes known as internal borrowing. This means the Council has minimised its interest costs by utilising internal resources over the short term instead of undertaking more expensive external borrowing. As our internal resources are being depleted, there is an increasing need for the Council to undertake new external borrowing to fund the capital programme. The Council will need to borrow up to £617.8m over the forecast period.

24.0 CIPFA's *Prudential Code for Capital Finance in Local Authorities* recommends that the Council's total debt should be lower than its highest forecast CFR over the next three years. Table 1 shows that the Council expects to comply with this recommendation during 2023/24.

Liability Benchmark

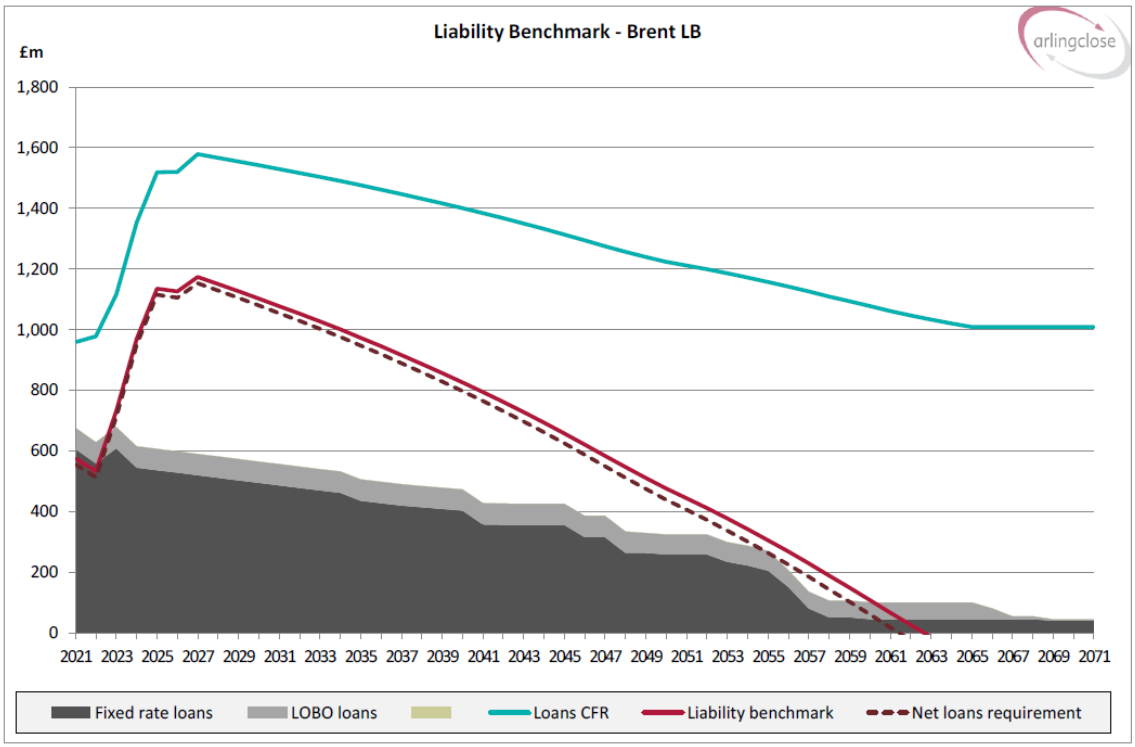
25.0 To compare the Council's actual borrowing against an alternative strategy, a liability benchmark has been calculated showing the lowest risk level of borrowing. This assumes that cash and investment balances are kept to a minimum level to maintain sufficient liquidity but minimise credit risk.

26.0 The liability benchmark is an important tool to help establish whether the Council is likely to be a long-term borrower or long-term investor in the future, and so shape its strategic focus and decision making. The liability benchmark itself represents an estimate of the cumulative amount of external borrowing the Council must hold to fund its current capital and revenue plans while keeping treasury investments at the minimum level required to manage day-to-day cash flow.

27.0 Table 2: Prudential Indicator: Liability benchmark

	31.3.22	31.3.23	31.3.24	31.3.25	31.3.26	31.3.27
	Actual	Forecast	Forecast	Forecast	Forecast	Forecast
	£m	£m	£m	£m	£m	£m
Loans CFR	1,024.1	1,149.6	1,411.2	1,623.5	1,675.2	1,705.0
Less: Balance sheet resources	(438.2)	(438.2)	(438.2)	(438.2)	(438.2)	(438.2)
Net loans requirement	**586.0**	**711.4**	**973.0**	**1,185.3**	**1,237.0**	**1,266.8**
Plus: Liquidity allowance	20.0	20.0	20.0	20.0	20.0	20.0
Liability benchmark	**606.0**	**731.4**	**993.0**	**1,205.3**	**1,257.0**	**1,286.8**

28.0 Following on from the medium-term forecasts in table 2 above, the long-term liability benchmark assumes minimum revenue provision on new capital expenditure based on a 5 - 60 year asset life and income, expenditure and reserves all increasing by inflation of 2.5% a year. This is shown in the chart below:



29.0 The Loan CFR (Blue lines) represents the need to fund capital expenditure through borrowing. The Liability benchmark (Red Lines) represents the level of borrowing requirement once reserves and working capital has been taken into account.

Where the liability benchmark exceeds the Council's current borrowing levels (Grey area), this indicates the real need to borrow.

Borrowing Strategy

30.0 The Council currently holds £684.6m million of loans, an increase of £25.5m (Last year £659.1m) on the previous year, due to the decrease in internal cash reserves and planned capital expenditure. The balance sheet forecast in Table 1 shows that the Council expects to borrow up to £1,219m by 2025/26 however, this is largely dependent on how the capital programme progresses. The Council may also borrow additional sums to pre-fund future years' requirements, providing this does not exceed the authorised limit for borrowing of £1.5 billion.

31.0 **Objectives:** The Council's main objective when borrowing money is to strike an appropriately low risk balance between securing low interest costs and achieving certainty of those costs over the period for which funds are required. The flexibility to renegotiate loans should the Council's long-term plans change is a secondary objective.

32.0 **Strategy:** Given the significant cuts to public expenditure and in particular to local government funding, the Council's borrowing strategy continues to address the key issue of affordability without compromising the longer-term stability of the debt portfolio. Interest rates have increased across the yield curve over the past year. The Council will continue to work closely with our Treasury advisors Arlingclose in order to borrow at optimal points avoiding the worst of the market volatility. Where appropriate, the Council may increase the proportion of it's debt held for short-term maturities.

33.0 In order to ensure long term stability of the debt portfolio, a proportion of the portfolio will be funded by long term borrowing. Where is affordable, this can help provide certainty to ensure the ongoing viability for capital programme schemes in these volatile markets.

34.0 **Sources of borrowing:** The approved sources of long-term and short-term borrowing are:

- HM Treasury's PWLB lending facility (formerly the Public Works Loan Board)
- any institution approved for investments (see below)
- any other bank or building society authorised to operate in the UK
- any other UK public sector body
- UK public and private sector pension funds (except the local Brent Pension Fund)
- capital market bond investors
- UK Municipal Bonds Agency plc and other special purpose companies created to enable local authority bond issues

35.0 **Other sources of debt finance:** In addition, capital finance may be raised by the following methods that are not borrowing, but may be classed as other debt liabilities:

- Leasing
- Hire purchase
- Private Finance Initiative
- Sale and leaseback

36.0 The Council has previously raised the majority of its long term borrowing from the PWLB and will continue to do so in 2023/24. The Council will also consider the arrangement of forward starting loans, where the interest rate is fixed in advance, but the cash is received in later years. This would enable certainty of cost to be achieved without suffering a cost of carry in the intervening period.

37.0 PWLB loans are no longer available to local authorities planning to buy investment assets primarily for yield. The Council has not undertaken such borrowing and has no plans to in future, which ensures continuing access to PWLB borrowing facilities.

38.0 In addition to above, the Council may borrow short-term loans to cover temporary cash flow pressures from other Local Authorities.

39.0 **Municipal Bonds Agency:** UK Municipal Bonds Agency plc was established in 2014 by the Local Government Association as an alternative to the PWLB. It issues bonds on the capital markets and lends the proceeds to local authorities. This is a more complicated source of finance than the PWLB for two reasons: borrowing authorities will be required to provide bond investors with a guarantee to refund their investment in the event that the agency is unable to for any reason; and there will be a lead time of several months between committing to borrow and knowing the interest rate payable. Any decision to borrow from the Agency will therefore be the subject of a separate report to members.

40.0 **LOBOs:** The Council holds £70.5m of LOBO (Lender's Option Borrower's Option) loans where the lender has the option to propose an increase in the interest rate at set dates, following which the Council has the option to either accept the new rate or to repay the loan at no additional cost. £26m of these LOBOs have options during 2023/24. Due to higher market rates, there is now a significant risk that some existing LOBO's may now require refinancing at higher rates or will require repaying.

41.0 **Short-term and variable rate loans:** These loans leave the Council exposed to the risk of short-term interest rate rises and are therefore subject to the interest rate exposure limits in the treasury management indicators below. Financial derivatives may be used to manage this interest rate risk (see section 69 below).

42.0 **Debt rescheduling:** The PWLB allows authorities to repay loans before maturity and either pay a premium or receive a discount according to a set formula based on current interest rates. Other lenders may also be prepared to negotiate premature redemption terms. The Council may take advantage of this and replace some loans with new loans, or repay loans without replacement, where this is expected to lead to an overall cost saving or a reduction in risk.

Treasury Investment Strategy

43.0 The Council holds invested funds, representing income received in advance of expenditure plus balances and reserves held. In the past 12 months, the Council's treasury investment balance has ranged between £37.7m and £124.5m due to capital expenditure utilising the Council's internal cash reserves. These balances are expected to remain low for the remainder of the year with cash available to invest for relatively short periods.

44.0 **Objectives:** The CIPFA Code requires the Council to invest its treasury funds prudently, and to have regard to the security and liquidity of its investments before seeking the highest rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income. Where balances are expected to be invested for more than one year, the Council will aim to achieve a total return that is equal or higher than the prevailing rate of inflation, in order to maintain the spending power of the sum invested. The Authority aims to be a responsible investor and will consider environmental, social and governance (ESG) issues when investing.

45.0 **Strategy:** Given the increasing risk and very low returns from short-term unsecured bank investments, the Council continue to monitor higher yielding asset classes during 2023/24. This represents a continuation of the strategy adopted in 2018/19. However, it is worth noting that this approach will be limited to the extent that the capital investment plans are delivered in line with current expectations. Should this prove to be the case, surplus funds will not be available to invest over longer durations as set out below.

46.0 **ESG Policy -** Environmental, social and governance (ESG) considerations are increasingly a factor in global investors' decision making, but the framework for evaluating investment opportunities is still developing and therefore the Authority's ESG policy does not currently include ESG scoring or other real-time ESG criteria at an individual investment level. When investing in banks and funds, the Council will prioritise banks that are signatories to the UN Principles for Responsible Banking and funds operated by managers that are signatories to the

UN Principles for Responsible Investment, the Net Zero Asset Managers Alliance and/or the UK Stewardship Code.

47.0 Currently, the majority of the Council's surplus cash remains invested in short-term money market funds. The average rate of interest received on short-term investments during the year to December 22 was 3.15% with an average duration of 1 day. Due to the authorities borrowing requirement, there is unlikely to be scope to improve the short term investment returns achieved as liquidity of the surplus funds will play a key role.

48.0 The Council will maintain a minimum investment balance of £10m to ensure the Council complies with the requirements to be a professional client under MIFID II regulations.

49.0 **Business models:** Under the new IFRS 9 standard, the accounting for certain investments depends on the Council's "business model" for managing them. The Council aims to achieve value from its treasury investments by a business model of collecting the contractual cash flows and therefore, where other criteria are also met, these investments will continue to be accounted for at amortised cost.

50.0 **Credit Rating:** Treasury investments in the sectors marked with an asterisk will only be made with entities whose long-term credit rating is no lower than A-. The Council uses the lowest rating quoted by the main rating agencies, as recommended by CIPFA. Where available, the credit rating relevant to the specific investment or class of investment is used, otherwise the counterparty credit rating is used. However, investment decisions are never made solely based on credit ratings, and all other relevant factors including external advice will be taken into account. Within these criteria the Director of Finance will have discretion to accept or reject individual institutions as counterparties on the basis of any information which may become available.

51.0 Credit ratings are obtained and monitored by the Council's treasury advisers, who will notify changes in ratings as they occur. Any institution will be suspended or removed should any factors give rise to concern, and caution will be paramount in reaching any investment decision regardless of the counterparty or the circumstances. Should an entity's credit rating be downgraded so that it does not meet the Council's approved criteria then:

- No new investments will be made;
- Full consideration will be made to the recall or sale of existing investments with the affected counterparty.

52.0 Where a credit rating agency announces that a credit rating is on review for possible downgrade (also known as "negative watch") so that it may fall below

the approved rating criteria, then only investments that can be withdrawn on the next working day will be made with that organisation until the outcome of the review is announced. This policy will not apply to negative outlooks, which indicate a long-term direction of travel rather than an imminent change of rating.

53.0 Having an appropriate lending list of counterparties, remains critically important to protecting Brent's investments. A list of extremely secure counterparties would be very small, and the limits with each would be correspondingly high. This would expose the Council to a risk of an unlikely but potentially large loss. This arises because the arrangements for dealing with banks in difficulty now require a loss to be imposed on various categories of liabilities of the banks to allow the bank to recapitalise itself and continue in business (sometimes referred to as bail in).

54.0 When deteriorating financial market conditions affect the creditworthiness of all organisations, as happened in 2008 and 2020, this is not generally reflected in credit ratings, but can be seen in other market measures. In these circumstances, the Council will restrict its investments to those organisations of higher credit quality and reduce the maximum duration of its investments to maintain the required level of security. The extent of these restrictions will be in line with prevailing financial market conditions. This will cause a reduction in the level of investment income earned, but will protect the principal sum invested.

55.0 **Government:** Loans to, and bonds and bills issued or guaranteed by, national governments, regional and local authorities and multilateral development banks. These investments are not subject to bail-in, and there is generally a lower risk of insolvency, although they are not zero risk. Investments with the UK Government are deemed to be zero credit risk due to its ability to create additional currency and therefore may be made in unlimited amounts for up to 50 years.

56.0 **Banks and building societies (unsecured):** Accounts, deposits, certificates of deposit and senior unsecured bonds with banks and building societies, other than multilateral development banks. These investments are subject to the risk of credit loss via a bail-in should the regulator determine that the bank is failing or likely to fail. There is no upper limit to the maximum credit loss that the Council could suffer in the event of a bail-in scenario. See section 54 below for arrangements relating to operational bank accounts. Investments in unsecured deposits will be limited to £20m.

57.0 **Registered providers (unsecured):** Loans to, and bonds issued or guaranteed by, registered providers of social housing or registered social landlords, formerly known as housing associations. These bodies are regulated by the Regulator of Social Housing (in England), the Scottish Housing Regulator, the Welsh Government and the Department for Communities (in Northern Ireland). As providers of public services, they retain the likelihood of receiving government

support if needed. Investments with registered providers will be limited to £20m in 2023/24.

58.0 **Secured investments:** Investments secured on the borrower's assets, which limits the potential losses in the event of insolvency. The amount and quality of the security will be a key factor in the investment decision. Covered bonds and reverse repurchase agreements with banks and building societies are exempt from bail-in. Where there is no investment specific credit rating, but the collateral upon which the investment is secured has a credit rating, the higher of the collateral credit rating and the counterparty credit rating will be used. The combined secured and unsecured investments with any one counterparty will not exceed the cash limit for secured investments. The Council and its advisors remain alert for signs of credit or market distress that might adversely affect the Council. Investments in secured deposits will be limited to £20m.

59.0 **Money market funds (MMFs):** Pooled funds that offer same-day or short notice liquidity and very low or no price volatility by investing in short-term money markets. They have the advantage over bank accounts of providing wide diversification of investment risks, coupled with the services of a professional fund manager. Although no sector limit applies to money market funds, the Council will take care to diversify its liquid investments over a variety of providers to ensure access to cash at all times. Deposits will not exceed 0.5% of the net asset value of the MMF. In addition, each Fund will be limited to a maximum deposit of £20m.

60.0 The investment strategy will provide flexibility to invest cash for longer periods in order to access higher investment returns. The upper limit for lending beyond a year is £50m. In practice, lending for more than one year will be only to institutions of the highest credit quality and at rates which justify the liquidity risk involved. Marketable instruments may have longer maturities, though the maturity will be considered in conjunction with the likely liquidity of the market and credit quality of the institution. Other than UK Central Government the Council may invest its surplus funds subject to a maximum duration of 25 years.

Alternative investment options will include:

61.0 **Strategic pooled funds:** Bond, equity and property funds that offer enhanced returns over the longer term but are more volatile in the short term. These allow the Council to diversify into asset classes other than cash without the need to own and manage the underlying investments. Because these funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the Council's investment objectives will be monitored regularly. Although considered as pooled funds, MMF's are discussed separately in paragraph 34. The Council currently has no investments in Pooled Funds (other than MMFs) at present, but may make

prudent use of them in the future. Investments in pooled funds will be limited to £20m in 2023/24.

62.0 **Real estate investment trusts (REITs):** Shares in companies that invest mainly in real estate and pay the majority of their rental income to investors in a similar manner to pooled property funds. As with property funds, REITs offer enhanced returns over the longer term, but are more volatile especially as the share price reflects changing demand for the shares as well as changes in the value of the underlying properties. The risk with any investments in REITs is that shares cannot be withdrawn but can be sold on the stock market to another investor which leaves the Council open to market risk. Investments in REITs will be limited to £20m in 2023/24.

63.0 **Other investments:** This category covers treasury investments not listed above, for example unsecured corporate bonds and company loans. Non-bank companies cannot be bailed-in but can become insolvent placing the Council's investment at risk.

64.0 **Operational bank accounts:** The Council may incur operational exposures, for example though current accounts, collection accounts and merchant acquiring services, to any UK bank with credit ratings no lower than BBB- and with assets greater than £25 billion. These are not classed as investments but are still subject to the risk of a bank bail-in. The Bank of England has stated that in the event of failure, banks with assets greater than £25 billion are more likely to be bailed-in than made insolvent, increasing the chance of the Council maintaining operational continuity. The Council banks with National Westminster Bank (NatWest) who meet the Council's minimum credit criteria. Should Natwest's creditworthiness deteriorate below the Council's minimum credit criteria, then as far as is consistent with operational efficiency, no money will be placed with NatWest and credit balances in the various Council accounts will be kept to a minimum level.

Investment limits: The Council's revenue reserves available to cover investment losses are forecast to be £384 million on 31st March 2023. In order that no more than 10% of available reserves will be put at risk in the case of a single default, the maximum that will be lent to any one organisation (other than the UK Government and Council subsidiaries) will be £20 million. A group of banks under the same ownership will be treated as a single organisation for limit purposes.

65.0 *Table 3: Investment Limits*

	Credit Quality	**Cash limit**	**Time Limit**
Any single organisation, except a Government entity	A- Or equivalent	£20m	n/a
UK Government	Any	Unlimited	50 years

Local Authorities & other government entities	Any	Unlimited	25 years
Banks (unsecured)*	A- Or equivalent	£20m	13 months
Building Societies (unsecured)*	A- Or equivalent	£20m	13 months
Registered providers and registered social landlords*	A- Or equivalent	£20m	5 years
Secured investments*	A- Or equivalent	£20m	5 years
Money market funds*	A- Or equivalent	Lower of 5% of total net assets of the fund or £20m	n/a
Strategic pooled funds*	A- Or equivalent	£20m	n/a
Real estate investment trusts*	A- Or equivalent	£20m	n/a
Other Investments*	A- Or equivalent	£50m	5 years

*** Minimum credit rating:** Treasury investments in the sectors marked with an asterisk will only be made with entities whose lowest published long-term credit rating is no lower than A-. Where available, the credit rating relevant to the specific investment or class of investment is used, otherwise the counterparty credit rating is used. However, investment decisions are never made solely based on credit ratings, and all other relevant factors including external advice will be taken into account.

For entities without published credit ratings, investments may be made either (a) where external advice indicates the entity to be of similar credit quality; or (b) to a maximum of £200,000 per counterparty as part of a diversified pool e.g. via a peer-to-peer platform.

66.0 **Liquidity management:** The Council uses internal purpose-built cash flow modelling tools to determine the maximum period for which funds may prudently be committed. The forecast is compiled on a prudent basis to minimise the risk of the Council being forced to borrow on unfavourable terms to meet its financial commitments. Limits on long-term investments are set by reference to the Council's medium-term financial plan and cash flow forecast. The Council aims to spread its liquid cash over at least two providers (e.g. bank accounts and money market funds) to ensure that access to cash is maintained in the event of operational difficulties at any one provider.

TREASURY MANAGEMENT PRUDENTIAL INDICATORS

67.0 The Council measures and manages its exposures to treasury management risks using the following indicators.

68.0 **Security:** The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment

portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

Table 4: Credit risk indicator

Credit risk indicator	Target
Portfolio average credit rating	A

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

Table 5: Liquidity risk indicator

Liquidity risk indicator	Target
Total cash available within 3 months	£20m

70.0 **Interest rate exposures:** This indicator is set to control the Council's exposure to interest rate risk. The upper limits on the one-year revenue impact of a 1% rise or fall in interest rates will be:

Table 6: Interest rate risk indicator

Interest rate risk indicator	Limit
Upper limit on one-year revenue impact of a 1% rise in interest rates	£5m
Upper limit on one-year revenue impact of a 1% fall in interest rates	£5m

The impact of a change in interest rates is calculated on the assumption that maturing loans and investments will be replaced at current rates.

71.0 **Maturity structure of borrowing:** This indicator is set to control the Council's exposure to refinancing risk. The upper and lower limits on the maturity structure of borrowing will be:

Table 7: Refinancing rate risk indicator

Refinancing rate risk indicator	Upper limit	Lower limit
Under 12 months	40%	0%
12 months and within 24 months	40%	0%
24 months and within 5 years	40%	0%
5 years and within 10 years	60%	0%
10 years and within 20 years	75%	0%
20 years and within 30 years	75%	0%
30 years and within 40 years	75%	0%

Over 40 years	75%	0%

Time periods start on the first day of each financial year. LOBOs are classified as maturing on the next call date i.e. the earliest date that the lender can require repayment.

72.0 **Principal sums invested for periods longer than a year:** The purpose of this indicator is to control the Council's exposure to the risk of incurring losses by seeking early repayment of its investments. The limits on the long-term principal sum invested to final maturities beyond the period end will be:

Table 8: Price risk indicator

Price risk indicator	**2023/24**	**2024/25**	**2025/26**
Limit on principal invested beyond year end	£50m	£50m	£50m

Related Matters

73.0 The CIPFA Code requires the Council to include the following in its treasury management strategy.

74.0 **Financial Derivatives:** A Derivative is a contract between two or more parties to hedge against the risk associated with the performance of an underlying asset. Local authorities have previously made use of financial derivatives embedded into its loans and investments both to reduce interest rate risk and to reduce costs or increase income at the expense of greater risk.

75.0 The general power of competence in Section 1 of the Localism Act 2011 removes much of the uncertainty over local authorities' use of standalone financial derivatives (i.e. those that are not embedded into a loan or investment).

76.0 The Council will only use standalone financial derivatives (such as swaps, forwards, futures and options) where they can be clearly demonstrated to reduce the overall level of the financial risks that the Council is exposed to.

77.0 Financial derivative transactions may be arranged with any organisation that meets the approved investment criteria. The current value of any amount due from a derivative counterparty will count against the counterparty credit limit and the relevant foreign country limit.

78.0 In line with the CIPFA Code, the Council will seek external advice and consult with Members before entering into financial derivatives to ensure that it fully understands the implications. This will include analysis of the impact on interest

rate, refinancing, counterparty, market, regulatory and legal risks, together with an assessment on the effectiveness of the derivative.

79.0 **Housing Revenue Account:** On 1st April 2012, the Council notionally split each of its existing long-term loans into General Fund and HRA pools. In the future, new long-term loans borrowed will be assigned in their entirety to one pool or the other. Interest payable and other costs/income arising from long-term loans (e.g. premiums and discounts on early redemption) will be charged/ credited to the respective revenue account. Differences between the value of the HRA loans pool and the HRA's underlying need to borrow (adjusted for HRA balance sheet resources available for investment) will result in a notional cash balance which may be positive or negative. This balance will be measured each month and interest transferred between the General Fund and HRA at the Council's average interest rate on investments, adjusted for credit risk.

80.0 **Markets in Financial Instruments Directive:** The MiFID II regulations took effect from January 2018 which saw the council reclassified as a retail client with the opportunity to opt up to professional client status. Retail clients have access increased protection however this would be balanced against potentially higher fees and access to a more limited range of products. The Council has opted up to professional client status with its providers of financial services, including advisors, banks, brokers and fund managers. Given the size and range of the Council's treasury management activities, the Director of Finance believes this to be the appropriate status for the Council's treasury management activities.

81.0 **Financial Implications:** The draft capital financing budget of £23.6m for 2023/24 has been calculated based on the reduction in balances available for investment and the increased external borrowing required.

82.0 **Other Options Considered:** The CIPFA Code does not prescribe any particular treasury management strategy for local authorities to adopt. The Council believes that the above strategy represents an appropriate balance between risk management and cost effectiveness. Some alternative strategies, with their financial and risk management implications, are listed below.

Table 9: Alternative Strategies

Alternative	Impact on income and expenditure	Impact on risk management
Invest in a narrower range of counterparties and/or for shorter times	Interest income will be lower	Lower chance of losses from credit related defaults, but any such losses may be greater
Invest in a wider range of counterparties and/or for longer times	Interest income will be higher	Increased risk of losses from credit related defaults, but any such losses may be smaller
Borrow additional sums at long-term fixed interest rates	Debt interest costs will rise; this is unlikely to be offset by higher investment income	Higher investment balance leading to a higher impact in the event of a default; however long-term interest costs may be more certain
Borrow short-term or variable loans instead of long-term fixed rates	Debt interest costs will initially be lower	Increases in debt interest costs will be broadly offset by rising investment income in the medium term, but long-term costs may be less certain
Reduce level of borrowing	Saving on debt interest is likely to exceed lost investment income	Reduced investment balance leading to a lower impact in the event of a default; however long-term interest costs may be less certain

Appendix 1 – Arlingclose Economic & Interest Rate Forecast – November 2022

Underlying assumptions:

- UK interest rate expectations have eased following the mini-budget, with a growing expectation that UK fiscal policy will now be tightened to restore investor confidence, adding to the pressure on household finances. The peak for UK interest rates will therefore be lower, although the path for interest rates and gilt yields remain highly uncertain.
- Globally, economic growth is slowing as inflation and tighter monetary policy depress activity. Inflation, however, continues to run hot, raising expectations that policymakers, particularly in the US, will err on the side of caution, continue to increase rates and tighten economies into recession.
- The new Chancellor dismantled the mini-budget, calming bond markets and broadly removing the premium evident since the first Tory leadership election. Support for retail energy bills will be less generous, causing a lower but more prolonged peak in inflation. This will have ramifications for both growth and inflation expectations.
- The UK economy is already experiencing recessionary conditions, with business activity and household spending falling. Tighter monetary and fiscal policy, alongside high inflation will bear down on household disposable income. The short- to medium-term outlook for the UK economy is bleak, with the BoE projecting a protracted recession.
- Demand for labour remains strong, although there are some signs of easing. The decline in the active workforce has fed through into higher wage growth, which could prolong higher inflation. The development of the UK labour market will be a key influence on MPC decisions. It is difficult to see labour market strength remaining given the current economic outlook.
- Global bond yields have steadied somewhat as attention turns towards a possible turning point in US monetary policy. Stubborn US inflation and strong labour markets mean that the Federal Reserve remains hawkish, creating inflationary risks for other central banks breaking ranks.
- However, in a departure from Fed and ECB policy, in November the BoE attempted to explicitly talk down interest rate expectations, underlining the damage current market expectations will do to the UK economy, and the probable resulting inflation undershoot in the medium term. This did not stop the Governor affirming that there will be further rises in Bank Rate.

Forecast:

- The MPC remains concerned about inflation but sees the path for Bank Rate to be below that priced into markets.
- Following the exceptional 75bp rise in November, Arlingclose believes the MPC will slow the rate of increase at the next few meetings. Arlingclose now expects Bank Rate to peak at 4.25%, with a further 50bp rise in December and smaller rises in 2023.
- The UK economy likely entered into recession in Q3, which will continue for some time. Once inflation has fallen from the peak, the MPC will cut Bank Rate.
- Arlingclose expects gilt yields to remain broadly steady despite the MPC's attempt to push down on interest rate expectations. Without a weakening in the inflation outlook, investors will price in higher inflation expectations given signs of a softer monetary policy stance.
- Gilt yields face pressures to both sides from hawkish US/EZ central bank policy on one hand to the weak global economic outlook on the other. BoE bond sales will maintain yields at a higher level than would otherwise be the case.

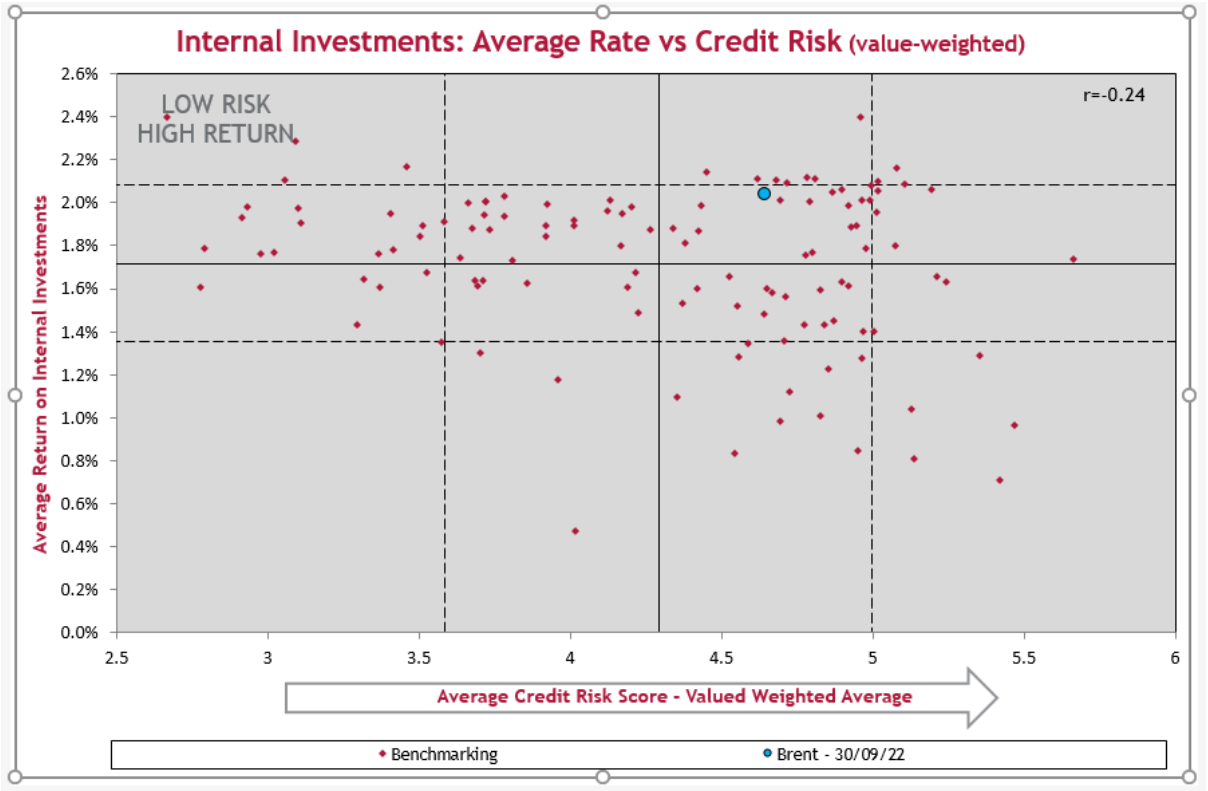
	Current	Dec-22	Mar-23	Jun-23	Sep-23	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25
Official Bank Rate													
Upside risk	0.00	0.25	0.50	0.75	1.00	1.00	1.00	1.25	1.50	1.75	1.50	1.25	1.25
Arlingclose Central Case	3.00	3.50	4.00	4.25	4.25	4.25	4.25	4.00	3.75	3.50	3.50	3.50	3.50
Downside risk	0.00	0.25	0.50	0.75	0.75	0.75	0.75	0.75	1.00	1.00	1.00	1.00	1.00
3-month money market rate													
Upside risk	0.00	0.25	0.50	0.75	1.00	1.00	1.00	1.25	1.50	1.75	1.50	1.25	1.25
Arlingclose Central Case	3.00	3.90	4.40	4.40	4.40	4.35	4.30	4.25	4.00	3.75	3.75	3.75	3.75
Downside risk	0.00	0.25	0.50	0.75	0.75	0.75	0.75	0.75	1.00	1.00	1.00	1.00	1.00
5yr gilt yield													
Upside risk	0.00	0.60	0.70	0.80	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Arlingclose Central Case	3.36	3.65	3.90	3.90	3.90	3.90	3.80	3.70	3.60	3.50	3.40	3.30	3.20
Downside risk	0.00	0.70	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
10yr gilt yield													
Upside risk	0.00	0.60	0.70	0.80	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Arlingclose Central Case	3.46	3.70	3.75	3.75	3.75	3.70	3.70	3.70	3.70	3.70	3.70	3.70	3.70
Downside risk	0.00	0.70	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
20yr gilt yield													
Upside risk	0.00	0.60	0.70	0.80	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Arlingclose Central Case	3.88	4.00	4.00	4.00	4.00	4.00	3.90	3.90	3.90	3.90	3.90	3.90	3.90
Downside risk	0.00	0.70	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
50yr gilt yield													
Upside risk	0.00	0.60	0.70	0.80	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Arlingclose Central Case	3.24	3.40	3.40	3.40	3.40	3.40	3.30	3.30	3.30	3.30	3.30	3.30	3.30
Downside risk	0.00	0.70	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00

PWLB Standard Rate (Maturity Loans) = Gilt yield + 1.00%
PWLB Certainty Rate (Maturity Loans) = Gilt yield + 0.80%
UKIB Rate (Maturity Loans) = Gilt yield + 0.60%

Appendix 2 – Existing Investment & Debt Portfolio Position

	31/12/22 Actual Portfolio £m	31/12/22 Average Rate %
External borrowing:		
Public Works Loan Board	**521.4**	**3.91**
Local authorities	**-**	**-**
LOBO loans from banks	**75.5**	**4.48**
Other loans	**90.0**	**2.61**
Short Term Loans	**75.0**	**2.91**
Total external borrowing	**761.9**	**3.47**
Other long-term liabilities:		
Private Finance Initiative	**20.5**	-
Finance Leases	**7.7**	-
Other long-term liabilities	**1.6**	-
Total other long-term liabilities	**29.8**	
Total gross external debt	**791.7**	
Treasury investments:		
Banks & building societies (unsecured)	**0.0**	**0.0**
Government (incl. local authorities)	**35.0**	**3.1**
Money Market Funds	**107.0**	**3.2**
Total treasury investments	**142.0**	**3.15**
Net debt	**619.9**	

Appendix 3 - Internal Investments: Average Rate vs Credit Risk



A credit rating of 4 is equivalent to credit score of AA-. The Council has a target rating of A which is a rating of 6. The current portfolio has a credit rating of A+ (Credit score 5) which exceeds our target rating.

Minimum Revenue Provision – 2023/24

1.1. Where the Council finances capital expenditure by debt, it must put aside resources to repay that debt in later years. The amount charged to the revenue budget for the repayment of debt is known as Minimum Revenue Provision (MRP), although there has been no statutory minimum since 2008. The Local Government Act 2003 requires the Council to have regard to the former Ministry of Housing, Communities and Local Government's Guidance on Minimum Revenue Provision (the MHCLG Guidance) most recently issued in 2018.

1.2. The broad aim of the MHCLG Guidance is to ensure that capital expenditure is financed over a period that is either reasonable commensurate with that over which the capital expenditure provides benefits, or, in the case of borrowing supported by Government Revenue Support Grant, reasonably commensurate with the period implicit in the determination of that grant.

1.3. The Guidance requires Full Council (or a delegated body) to approve an MRP policy statement in advance of each financial year and recommends a number of options for calculating a prudent amount of MRP.

1.4. In accordance with the current guidance for the calculation of MRP the following policy for non-HRA assets has been applied:

1.4.1. For supported borrowing, the Council will use the asset life method (Option 3) and an 'annuity' approach for calculating repayments. Based on the useful economic lives of the council's assets, a single annuity has been calculated, which results in the outstanding principal being repaid over the course of one hundred years.

1.4.2. For prudential borrowing, the Council will adopt Option 3, 'the asset life method', and an 'annuity' approach for calculating repayments. This option allows provision for repayment of principal to be made over the estimated life of the asset. The use of the 'annuity' method is akin to a mortgage where the combined sum of principal and interest are equalised over the life of the asset.

1.4.3. In line with the statutory guidance, MRP will be charged for finance leases at a rate equal to the amount that goes to write down the balance sheet liability.

1.4.4. MRP will include a charge equal to any capital lifecycle additions within the lease.

1.4.5. Where borrowing is undertaken for the construction of new assets, MRP will only become chargeable once such assets are completed and operational. Whilst this is not one of the options in the MHCLG Guidance, it is thought to be a prudent approach since it ensure that the capital expenditure incurred on the loan is fully funded over the life of those assets.

1.4.6. The Council reserve the right to charge a £nil MRP where the conditions set out in paragraph 26 of the statutory guidance have been met.

1.5. The asset lives which will be applied to different classes of assets are as shown in table 1, however the Council reserves the right to determine useful life periods and prudent MRP in exceptional circumstances where the recommendations of the guidance would not be appropriate.

Table 1

Asset Type	**Years**
Vehicles and equipment	5 to 15 years
Capital repairs to roads and buildings	15 to 25 years
Purchase of buildings	30 to 40 years
New construction	40 to 60 years
Purchase of land	50 to 100 years

1.6. Based on the Council's latest estimate of its capital financing requirement (CFR) on 31st March 2023, the MRP budget for 2023/24 has been set at £12.0m.

BRENT RESERVES STRATEGY

What are reserves?

CIPFA states in the *Financial Management Code* that "the aim of the authority's financial reserves is to provide funding for investment in future activities and to act as a safety net in case of short-term financial challenges."

What is a reserves strategy?

The *Reserves Strategy* defines the level and purposes for which the Council holds reserves. It consists of three key elements:

1. ***Strategy***: what the Council is seeking to achieve through holding reserves;

2. ***Financial Planning***: linking the level of reserves with plans for their use over the period of *Medium Term Financial Strategy* (MTFS); and

3. ***Operational Framework***: how the Council determines the level of reserves, manages those reserves and plans for their use in line with best practice and statutory requirements.

Together these elements set out the Council's ambition for reserves, the nature of that ambition and how we will provide assurance.

STRATEGY

Why do we need a reserves strategy?

The Council plans its finances over the short term, medium and long term so that it has adequate resources to deliver services for the residents of the borough. As a large, complex organisation, there will always be variations between our actual spending/income and our plans due to variations in demand, demographic change, changes in costs and the funding decisions of third parties as well as the need to deliver projects and investments spanning more than one financial year.

To ensure we can manage these financial risks, whilst being able to maintain services, requires that the Authority holds funds in reserve to meet these costs as and when they arise and to deal with any unexpected emergency that may occur. A reserves strategy enables us to do this in a planned way.

Do we have to have a reserves strategy?

The requirement for financial reserves is acknowledged in statute. Sections 32 and 43 of the *Local Government Act* 1992 require precepting authorities and billing authorities in England and Wales to have regard to the level of reserves needed for meeting estimated future expenditure when calculating the budget requirement.

There are other safeguards in place that help to prevent the Council from over-committing itself financially. These include:

a) The balanced budget requirement (*Local Government Act* 1992 s32 and s43);

b) Chief Finance Officer's duty to report on the robustness of estimates and adequacy of reserves (*Local Government Act* 2003 s25) when the Council is considering the budget requirement;

c) Legislative requirement to make arrangements for the proper administration of the Council's financial affairs and that the Chief Finance Officer has responsibility for the administration of those affairs (*Local Government Act* 1972 s151);

d) The requirements of the *Prudential Code*;

e) Auditors' consideration of whether the audited body has established adequate arrangements to ensure that its financial position is sustainable. Financial sustainability is covered as part of the *Value for Money Audit*; and

f) CIPFA's *Financial Management Code* requirement that the effective management of reserves is reviewed as part of a formal Financial Resilience Assessment (FRA).

These requirements are reinforced by section 114 of the *Local Government Finance Act* 1988, which requires the Chief Finance Officer to report if there is likely to be unlawful expenditure or an unbalanced budget. This would include situations where reserves have become seriously depleted and it is forecast that the Council will not have the resources to meet its expenditure in a particular financial year.

Whilst it is primarily the responsibility of the Chief Finance Officer to maintain a sound financial position, the external auditors will, as part of their wider responsibilities, consider whether the audited body has established adequate arrangements to ensure that its financial position is soundly based. However, it is not the responsibility of the external auditors to prescribe the optimum or minimum level of reserves for the Council.

FINANCIAL PLANNING

How does it fit with our other strategies?

The *Reserves Strategy* is part of a suite of supporting strategies that supplement the *Borough Plan* and the *Medium Term Financial Strategy*. These detailed strategies provide an additional level of granularity that helps to create a bridge between the over-arching strategies and operational delivery plans

CIPFA's *Prudential Code* requires the Chief Finance Officer to have regard to affordability when making recommendations about the future capital programme. Such consideration includes the level of long-term revenue commitments. Indeed, in considering the affordability of its capital plans, the Council is required to consider all of the resources available to it and estimated for the future, together with the totality of its capital plans and revenue forecasts for the forthcoming year and the following two years.

There is a requirement for three-year revenue forecasts across the public sector and this is achieved through the *Medium Term Financial Strategy* and the annual budget.

The 2021 Autumn Budget and Comprehensive Spending Review (CSR21) provided details of proposed government support for a three-year timeframe, but with only a one-year detailed financial settlement. This creates uncertainty over future funding and provides limited information for planning over the medium term the use of balances and reserves.

How are the level of reserves set?

CIPFA's Local Authority Accounting Panel does not accept that there is a case for introducing a generally acceptable minimum level of reserves. Instead, it is for the Council, on the advice of its Chief Finance Officer, to make its own judgement on such matters, taking into account all relevant local circumstances. What are relevant circumstances will vary between areas. A well-managed organisation with a prudent approach to budgeting should be able to operate with a minimal level of general reserves which are appropriate to the risks (both internal and external) to which it is exposed. In assessing the appropriate level of reserves, a well-managed organisation will ensure that the reserves are not only adequate, but also are necessary.

It is worth noting that not all reserves are usable. Some reserves arise out of the interaction of legislation and proper accounting practice. These are termed 'unusable reserves' as they cannot be used for any other purpose. They are not considered further as there is no need to set their level and no discretion over their creation, purpose or usage.

Types of Reserve

When reviewing the medium term financial plans and preparing the annual budgets, the establishment and maintenance of reserves should be considered. These can be held for five main purposes:

a) **Working Balance** - to help cushion the impact of uneven cash flows and avoid unnecessary temporary borrowing – this forms part of general reserves.
b) **Contingency Reserve** - to cushion the impact of unexpected events or emergencies – this forms part of general reserves.
c) **Sinking Fund and Smoothing Reserves** – these allow a response to uncertainty in the economic climate and provide assurance on the safety of the Council's financial assets. These are closely linked with the *Treasury Management Strategy* and *Capital Strategy* - these form part of general reserves.
d) **Statutory and Ring-fenced Reserves** – these are held for specific purposes, often set by statute. Examples include grant funding where the expenditure has yet to be incurred (Capital Grants Unapplied), the HRA Balance and the Schools Balances. Although these are legally part of the general reserves, the restrictions and limitations on their use mean that they should be accounted for separately and not viewed as generally usable.
e) **Earmarked Reserves** – these represent a means of building up funds to meet known or predicted requirements, such as planned

investment, capital projects and change programmes; earmarked reserves are accounted for separately and viewed as largely not generally usable. They remain legally part of the general reserves.

In addition the Council holds the following two usable reserves:

a) **Major Repairs Reserve** – this reserve records the unspent amount of HRA balances for capital financing purposes in accordance with statutory requirements for the reserve. This is an HRA specific reserve.
b) **Capital Receipts Reserve** – this reserve holds the proceeds from the sale of assets, and can only be used for those purposes specified in the capital finance and accounting regulations.

OPERATIONAL FRAMEWORK

When establishing reserves, there needs to be compliance with the *Code of Practice on Local Authority Accounting* and in particular, the need to distinguish between reserves and provisions.

The split of reserves into five categories is helpful as each category has its own nature, purpose and planned usage that can be used to determine the required level of reserves.

Working Balance

The cash flow forecast is key to understanding the level of reserve required to cushion the impact of uneven cash flows. The overall size of the net expenditure budget should be used as the reference point for determining the percentage required to be retained as the working balance.

Contingency Reserve

Determining a suitable level of reserve to cover the unexpected is an inexact science. At best this will be an estimate created using risk management techniques to determine the likelihood and impact of potentially disastrous events. Past experience demonstrates the ability of the Council to deliver savings, while dealing with resource reductions and demographic and other demand changes. How these issues have been tackled without overspending the budget will be an important consideration in deciding how much needs to be set aside in reserves as contingency. A reasonableness check also needs to be considered - retaining adequate funds to cover a calamitous event such as a second pandemic may be overly cautious and therefore not prudent as it ties up scarce resources unnecessarily. The contingency requirement should be referenced to a percentage of net expenditure.

The first two types of reserve, although different in nature, involve dealing with the unplanned and unexpected. The Council also hold reserves for planned purposes. It defines these usable reserves under the following headings:

- Ring-fenced and Statutory
    - HRA
    - Schools
    - COVID
- Capital
- Investment
- Sinking and Smoothing
- Service reserves
- Transformation
- General Fund Balance

When considering reserves held for specific purposes that could be freely utilised to fund unexpected expenditure, only the final three headings (service reserves, transformation and the general fund balance) can be used without limitation. The other reserves are either restricted to a specific use or already committed. Theoretically, the General Fund balance could be viewed as the working balance, whilst the other two types of reserve constitute amounts available for contingency purposes.

As stated already, the reference point for determining the target level for the working balance and contingency reserves should be a percentage of net expenditure. The end result will be a single target percentage of net expenditure that should be held. Although CIPFA oppose an arbitrary figure, 5% is widely used in local authorities as such a target. This is viewed as a starting point and tested for adequacy by considering past data and future forecasts. When considering past experience, use has been made of both benchmarking data for other London boroughs, provided by London Councils and CIPFA's Financial Resilience Index, and historic data for the Council. The comparative data shows that the level of reserves at Brent is good and provides strong foundations for long-term financial sustainability.

An analysis has been undertaken of the percentage of over- or under-spend that the year-end outturn represents of the Council's net budget. This shows that at no point in the last 20 years did any year-end overspend equate to as much as 2% of the net expenditure budget. Looking to the future, funding uncertainty, cost drivers, demand pressures and demographic changes have been considered. Further factors such as the effects of COVID-19 and the current high levels of inflation have also been taken into account. The conclusion of this work is that 5% is a reasonable minimum level of general reserves based on past experience and future expectations.

Uncertainty and Smoothing Reserves

At Brent, reserves for insurance, redundancy and welfare reform are examples of this type of reserve. Each is set on the basis of an individual calculation that takes in to account relevant factors and local circumstances. The *Reserves Strategy* recommends that this policy continues with a requirement to demonstrate need and

adequacy are a part of the working paper for the calculation of any reserve under this heading.

Statutory and Ring-fenced Reserves

As these arise from circumstances largely prescribed by statute, there is no need to provide further policy on their level or use. The Council divides these reserves between s106/CIL, Ring-fenced and capital reserves. They are presented in the accounts as part of the earmarked reserves.

Earmarked Reserves

Under this heading fall service specific reserves including carry forwards and more general amounts set aside for transformation, service pressures and future funding risks. The need for and level of these reserves should be justified by a calculation demonstrating the requirement for the reserve, its intended purpose, how its level has been determined and plans for its profiled release. This should be aligned with corporate plans and strategies such as the *Borough Plan*, the *MTFS* and the *Capital Strategy* as appropriate. All earmarked reserves should be reviewed annually as part of the closure of the accounts.

MONITORING

The level of all reserves is kept under continuous review by the Director of Finance. This is achieved through revisions to the *Medium Term Financial Strategy* and the budget monitoring reports. Periodic updates will be provided to the Cabinet and the Audit and Standards Advisory Committee. The planned level of reserves will reported to the Council annually via the *Budget Report*.

USE OF RESERVES

The maintenance and use of reserves play a key role in long-term financial sustainability. Just as the creation and maintenance of reserves arises in a structured way through the Council's financial planning process, so the release of reserves needs to be subject to a similarly planned and controlled process. Such a process is provided by the *Scheme of Transfers and Virements,* which sets out specific requirements for the use of reserves. The main points are:

1. Reserves cannot be used to fund overspends without a plan

   Section 3 of the Scheme of Transfers and Virements requires that "Reserves must not be used to fund ongoing overspends unless there is an agreed, realistic plan to eliminate the overspend before the reserve is exhausted (this applies to all reserves, both earmarked and non-earmarked). The Director of Finance must review planned uses of reserves to ensure that these are not being used to hide or obscure systemic overspends. The Director of Finance must report to Full Council report any areas with inadequate plans to address overspends."

2. Budget report must identify the reserves against which overspends can be charged

   Section 3 of the Scheme of Transfers and Virements states that "In certain circumstances where such overspends on Funds arise, there is a choice as to which reserve the charge should be made. The annual Budget Report will identify which reserves overspends will and will not be charged against, for approval by Full Council. In the event of inadequate reserves to fund overspends, the Director of Finance may have to use additional reserves to fund overspends, any such action is to be reported to Full Council. "

3. Budget report must specify how reserves are to be used

   Section 6 of the Scheme of Transfers and Virements directs that "Reserves have been established to aid the smooth running of the Council's finances, and it will be normal to charge costs to those reserves subject to financial regulations and local procedures and policies. Further, the council has capital monies, such as capital grants and capital receipts held in the council's useable reserves. The Schedule of Earmarked Reserves in the Budget Report must specify how the council's useable reserves are to be used, including if they can be used to fund overspends, and this needs to be approved by Full Council as part of the Budget Report. Officers may make transfers from these reserves up to the amounts in the Budget Report for the specified purposes."

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BRENT RESERVES	PURPOSE AND PLANNED USAGE	Actual 31/03/2022 £m	Movement £m	Forecast 31/03/2023 £m	Movement £m	Forecast 31/03/2024 £m
BALANCES						
General Fund Balance	This both provides the Council's working balance and represents an amount held against unexpected overspends or failure to identify sufficient savings to balance the budget in year. On a net budget of £358m, even a 2% variance would rapidly erode this and would leave the Council dangerously exposed. For this reason the Council aims to retain at least 5% of its net expenditure as a contingency reserve.	(15.1)	0.0	(15.1)	(2.9)	(18.0)
Schools Balances	Balance carried forward of Dedicated Schools Grant delegated to individual schools. Forecast to decline in response to school funding pressures and not directly in the control of the Council.	(17.0)	3.9	(13.1)	2.6	(10.5)
HRA Balance	This is the accumulated surplus of income over expenditure for the HRA. This can only be used for the HRA. The balance is used as a contingency against overspending and unexpected events that affect the HRA.	(0.4)	0.0	(0.4)	0.0	(0.4)
TOTAL BALANCES		**(32.5)**	**3.9**	**(28.6)**	**(0.3)**	**(28.9)**
CAPITAL RESERVES						
Capital Receipts Reserve	The proceeds from the disposal of land or other assets. Capital receipts can only be used to finance new capital expenditure, to provide loans or grants or to repay debt. They cannot be used to fund revenue expenditure.	(7.0)	0.0	(7.0)	0.0	(7.0)
Major Repairs Reserve	The unspent amount of the Major Repairs Allowance provided for capital renewal of HRA properties.	(0.9)	0.0	(0.9)	0.0	(0.9)
Capital Grants Unapplied	Capital grants received from central government agencies unapplied as not yet used to fund capital projects. Major elements include Basic Needs Grant for additional school places, School Condition Grants, DFG – Disabled Facilities Grant and others.	(69.6)	0.0	(69.6)	0.0	(69.6)
TOTAL CAPITAL		**(77.5)**	**0.0**	**(77.5)**	**0.0**	**(77.5)**
EARMARKED RESERVES						
Capital and other statutorily ring-fenced reserves						
S106/Community Infrastructure Levy (CIL)	This reserve is made up of the Community Infrastructure Levy (CIL) and S106 planning contributions made under legally binding agreements. The accumulated S106/CIL receipts that have not yet been spent are committed to finance planned capital expenditure, as set out in the *Capital Strategy* . Community Infrastructure Levy is made up of an amount paid over to the Mayor of London on a quarterly basis (MCIL), and an amount retained by the Borough (BCIL). BCIL is divided into Strategic CIL (SCIL) for use borough-wide, and a local amount termed Neighbourhood CIL (NCIL). A Cabinet decision is required to allocate Strategic CIL to finance new capital expenditure before it can be added to the Brent capital programme. There is also an allowance for administration costs which can be deducted from CIL. The balance on each category at 31 March 2022 was: £m SCIL (110.9) NCIL (17.3) BCIL **(128.2)** MCIL (3.9) Admin 0.4 Total CIL **(131.8)** S106 (18.5) Total S106 & CIL **(150.3)**	(150.3)	(3.5)	(153.8)	(4.9)	**(158.7)**

BRENT RESERVES	PURPOSE AND PLANNED USAGE	Actual 31/03/2022 £m	Movement £m	Forecast 31/03/2023 £m	Movement £m	Forecast 31/03/2024 £m
	The S106 reserve balance at 31 March 2022 was £18.5m. The majority of this is committed to financing capital expenditure, with some revenue projects also benefitting. The reserve must be used to offset the impact of new development (there are some very specific exceptions which apply to some older S106 agreements, but these will invariably be very restrictive in any event). There are limits to the discretion as to what S106 contributions can subsequently be used to finance which are written into the individual S106 legal agreements.					
Ring-fenced						
HMO Licensing	Income is received on a five yearly cycle and released annually to meet expenditure. The service does not have a mainstream budget for this activity, and the reserve is ring-fenced by law and operationally required to match the different cycles of income and expenditure.	(2.6)	0.0	(2.6)	0.0	(2.6)
HRA Earmarked	This reserve has been set aside to cover contingent liabilities for insurance claims.	(1.7)	0.0	(1.7)	0.0	(1.7)
Public Health	Reflects carry forward of ring fenced funds for Public Health	(8.1)	(2.0)	(10.1)	0.0	(10.1)
Edward Harvist Trust	Brent distributes grant monies from the Edward Harvist Trust	(0.1)	0.0	(0.1)	0.0	(0.1)
Total		**(12.5)**	**(2.0)**	**(14.5)**	**0.0**	**(14.5)**
Capital Finance Related						
South Kilburn	This reserve smooths annual payments on the programme, which is any given year may be more or less than the budget. It is allocated to South Kilburn and, assuming that the remaining 7 years of the programme run to budget, will be spent in full.	(5.5)	0.0	(5.5)	0.0	(5.5)
General Fund Capital funding	This reserve is used to finance existing or future expenditure on projects within the Capital Programme.	(67.3)	9.2	(58.1)	3.6	(54.5)
Total		**(72.8)**	**9.2**	**(63.6)**	**3.6**	**(60.0)**
TOTAL		**(85.3)**	**7.2**	**(78.1)**	**3.6**	**(74.5)**
Committed Reserves						
Sinking fund and other smoothing reserves						
PFI	In the financial models for the council's PFIs, income and expenditure do not match in any given year. This is normal under such arrangements, as the PFI contractor is bearing the up-front cost of the capital investment. This reserve is ring-fenced to provide funds to cover this mismatch.	(5.4)	0.0	(5.4)	0.0	(5.4)
UC staffing	This reserve is fully committed to paying for staff working on Housing Benefit claims. As more cases transfer to Universal Credit, managed by the DWP, less staff will be required to work on Housing Benefit claims.	(1.4)	0.5	(0.9)	0.7	(0.2)
Redundancy	The reserve is used to fund redundancy costs. Without it, many planned savings would take a year longer to start delivering their benefits (assuming that the average redundancy cost is about one year's salary).	(3.2)	1.7	(1.5)	0.0	(1.5)
Insurance	The insurance reserve sets aside funds to cover self-insured items and any excesses on externally insured cover. This differs from the Insurance provision which covers amounts set aside upon review by the Council's insurance actuary to make sure that we have enough to deal with the pipeline of known cases that are not yet settled.	(5.3)	0.0	(5.3)	0.0	(5.3)

BRENT RESERVES	PURPOSE AND PLANNED USAGE		Actual 31/03/2022 £m	Movement £m	Forecast 31/03/2023 £m	Movement £m	Forecast 31/03/2024 £m
Business Equalisation Reserve and other Central Reserves	This reserve is used to manage volatility in the amounts retained within the council tax and business rates retention regimes, in particular the impact of backdated revaluation appeals, appeals relating to Material Change of Circumstances and collection rates. In addition c£35m was previously held to repay the collection fund deficit, over three years, generated from compensation grants from government received to offset the additional COVID-19 reliefs that were granted to businesses. Of this, c£6m remains to be repaid by 31 March 2023.		(24.2)	15.0	(9.2)	6.1	(3.1)
Temporary Accommodation	Temporary Accommodation Service Pressures - Smoothing reserve to manage fluctuations in homelessness costs.		(8.3)	0.0	(8.3)	0.0	(8.3)
Total			**(47.8)**	**17.2**	**(30.6)**	**6.8**	**(23.8)**
TOTAL			**(47.8)**	**17.2**	**(30.6)**	**6.8**	**(23.8)**
Other earmarked reserves							
Service reserves							
Adult Social Care & Health	This reserve is comprised of:		(12.4)	1.7	(10.7)	1.2	(10.7)
	Brent NHS S256 Agreement - Joint Investment Funding. Agreement with the Council for joint programmes across health and social care.	(8.6)					
	Other reserves including MHCLG Community Champions	(3.4)					
	This includes balance of grants for CNWL Mental Health Supplement and Reablement and LD DHSC Community Discharge Grant	(0.4)					
		(12.4)					
Children and Young People	£1.5m of the reserves relates to projects including Education Recovery, Mental Health Support teams in schools and Accelerated Support scale up team and most of the funding will be utilised in 2022/23. £1.2m of this reserve is linked to a combination of previous and current government grants, including the Youth Justice fund grant, troubled families program and MOPAC grants.		(2.7)	2.0	(0.7)	0.2	(0.7)
	This reserve is comprised of: Customer Services and Libraries:						
	- Community Hubs (play key role in responding to Poverty Commission's recommendations)	(0.7)					
	- Council Tax Improvement project (covers system replacement)	(0.3)					
	Transformation: monies set aside to fund a contribution to investments in improving the condition of the roads and pavements and transformational project work to improve the department's ability to generate future income. Including a proposed movement of £130k from Environmental Services reserve.	(1.3)					
	Proceeds of Crime Act: historic income from Proceeds of Crime Act which is subject to a ringfence and is planned to be used to fund financial investigators and enforcement officers	(1.7)					

BRENT RESERVES	PURPOSE AND PLANNED USAGE		Actual 31/03/2022 £m	Movement £m	Forecast 31/03/2023 £m	Movement £m	Forecast 31/03/2024 £m
Resident Services	Cemeteries Maintenance: to fund the long term maintenance of cemeteries. Some fees & charges income in the years that burial plots are sold are set aside to fund a proportion of the maintenance in the future – (i) any large maintenance expenditure that cannot be funded by in-year income and (ii) ongoing maintenance costs once cemeteries are full and no longer receiving income	(1.2)	(6.3)	1.7	(4.5)	0.1	(4.5)
	Environmental Services: this contains some external funding to which there will be ring-fences on policy purposes (e.g. for Community Protection Team, shared reserve with Harrow for Trading Standards Service), and more or less formal earmarking by the services in question. Otherwise, the reserves allow the services in question to operate with a degree of flexibility in responding to issues.	(1.0)					
	This includes MHCLG Rogue Landlord Enforcement Grant	(0.3)					
		(6.6)					
Communities and Regeneration	This is comprised of reserves for Regeneration (£2.3m) and Communities (£1.1m). These are earmarked for various specific projects and initiatives.		(3.4)	0.4	(3.0)	0.0	(3.0)
Governance	This reserve is earmarked for specific projects and the local elections.		(1.4)	(0.5)	(1.9)	0.0	(1.9)

BRENT RESERVES	PURPOSE AND PLANNED USAGE	Actual 31/03/2022 £m	Movement £m	Forecast 31/03/2023 £m	Movement £m	Forecast 31/03/2024 £m
Finance and Resources	This reserve is held for investigations.	(0.2)	0.0	(0.2)	0.0	(0.2)
Total		**(26.4)**	**5.3**	**(21.0)**	**1.5**	**(21.0)**
Budget stabilisation						
Inflation Risk	This is a general reserve to smooth out the effects of high and volatile inflation on the Council's budgets. The reserve will be used to offset additional pressures on service budgets which arise as a result of inflation exceeding what was forecast at budget setting, thereby reducing the requirement for savings in order to balance budgets in the short term.	0.0	(10.0)	(10.0)	0.0	(10.0)
Future funding risks	This is a general reserve to cover any future service pressures, such as demand pressures and demographic changes, which are in excess of any provision already made in the annual budget and future funding risks relating to the one-year front-loaded local government finance settlement, changes to the business rates revaluation methodology and the Government's 'levelling up' agenda, which is widely expected to move resources away from London.	(19.2)	13.1	(6.1)	0.0	(6.1)
Total		**(19.2)**	**3.1**	**(16.1)**	**0.0**	**(16.1)**
COVID-19 reserves	This reserve covers the potential financial impact of COVID-19 and is funded through Government Grants with restrictions on the use of the funding	(17.0)	12.6	(4.4)	1.1	(3.3)
TOTAL		**(62.5)**	**21.0**	**(41.5)**	**2.6**	**(40.3)**
TOTAL EARMARKED		**(345.9)**	**41.9**	**(303.9)**	**8.0**	**(297.3)**
GRAND TOTAL		**(455.9)**	**45.8**	**(410.0)**	**7.7**	**(403.7)**

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APPENDIX L

Financial Management Code: Financial Resilience Assessment

Purpose

CIPFA's Financial Management (FM) Code recommends that local authorities undertake a financial resilience assessment (FRA) each year. The FRA builds on the one-year assessments required under section 25 of the Local Government Act 2003 of the robustness of the estimates used in the budget calculations and the adequacy of the proposed levels of financial reserves.

Context

CIPFA states that "effective governance and financial management is focused on ensuring that the authority is able to operate sustainably in the long term. This means that the authority needs to look beyond the limited time horizons of its funding arrangements and to consider the longer-term financing of its operations and activities."

The financial resilience assessment considers long-term financial stability. It does so by considering warning signs such as the symptoms of financial stress and reviewing how effectively the authority manages its finances. This includes explicit consideration of capital resources, reserves, savings plans and the use of performance information. The FM Code requires that the authority demonstrates how the risks identified through a financial resilience assessment have informed the development of its longer-term financial strategy.

Approach

Pre-requisites for the financial resilience assessment are the council's strategic plan (Borough Plan) and financial strategy (MTFS). The FM code recommends the technique of scenario planning to inform their development. For capital CIPFA's Prudential Code provides a framework for the self-regulation of the authority's capital financing arrangements. The financial resilience assessment reviews how effectively the council delivers the aims of the Prudential Code. It also considers how the Council develops a suitable Capital Strategy and how it sets and reviews the various indicators required under the Prudential Code.

Medium Term Planning

The Medium Term Financial Strategy translates the authority's financial strategy into a plan for the near future. Before a financial resilience assessment can be undertaken, the Council needs develop a robust medium-term financial plan that coordinates and integrates financial and service planning, capital financial management, risk management and asset management plans. This needs to be linked to the long-term financial planning process that the FM Code advocates together with adoption of a robust cycle of the financial year that will become a feedback loop to inform the financial planning process.

Long Term Planning

A full and thorough financial resilience assessment can only be undertaken once the Council's service and financial planning framework has moved to a more long-term and better joined up position with a clearly linked and articulated Medium Term Finance Strategy, a Long Term Financial Strategy, Borough Plan, Service Plans and Capital Strategy. These plans need to be seen as dynamic documents which are subjected to sensitivity analysis using techniques such as scenario planning and risk management to ensure that the Council's finances will be sustainable in the long-term.

Reviewing of Current Position

The FRA will consider CIPFA's symptoms of financial stress. These are:

Symptoms of financial stress

Running down reserves	Using the authority's financial reserves to finance a deficit or to avoid difficult decisions around spending cuts. This provides temporary relief, but is not sustainable in the long term.
Failure to address financial pressures	Refusing to make difficult decisions about how to reconcile funding and service pressures, or not recognising that such decisions need to be made. This is equally not a solution to those challenges, but instead simply increases the financial gap and the extent of change that will be required in future years.
Shortened planning horizons	Long-term planning is more difficult in times of uncertainty, but it is still important, perhaps even more so than in more stable circumstances. A failure to plan is indicative of a lack of strategic thinking and an unwillingness to make difficult decisions.
Lack of investment in infrastructure resources	When resources are scarce, it is tempting to defer the maintenance and enhancement of assets (such as buildings) to future periods, which can result in the failure of key physical resources and repairs backlogs that are ultimately more costly than timely maintenance and planned investment in enhancements.
Gaps in savings plans	Knowing that savings are required is helpful, but knowing how these savings are going to be achieved is critical. Simply indicating that 'unidentified savings' will be made is not an acceptable strategy for financial resilience.
Unplanned overspends	No budget is going to be absolutely spot-on. However, overspending against the budget is simply rolling over this year's problems into next year. It is a clear sign that the authority is failing to turn its financial policy decisions into action on the ground.

Ensuring processes deliver financial resilience

This work will cover many of the core financial management process: the MTFS, budget setting process, Capital Strategy, Asset Management Plan, performance management, benchmarking and peer reviews of performance, agreement and management of savings and the effective management of reserves. The main headings are:

Factors for assessing financial resilience

Routine	Getting routine financial management right
Capital	Planning and managing capital resources well
Performance	Using performance information effectively
Savings	Having clear plans for delivering savings
Reserves	Managing reserves well.

Scope of Formal Assessment

The scope for the formal Financial Resilience Assessment is as follows:

Scope

Current	The authority's current financial position
Future	The authority's own assessment of its future financial prospects
Adopted FRF	The extent to which the authority has embraced the financial resilience factors discussed above
Risks	The key financial risks facing the authority, for example by drawing on potential future scenarios including 'best' and 'worst' case scenarios – for the environment in authority operates and for the services that it provides
Independent measures of risk	The use of independent, objective measures to assess the risks to the authority's financial resilience and sustainability.
Associated risks	The authority's understanding of the risks associated with all resources used for service delivery, including its workforce, its physical assets, its strategic business partners (including 'group' entities such as leisure trusts), its information technology infrastructure, etc
Robustness	The robustness of the plans that the authority has put in place to address these risks
Capacity	The capacity and capability of the authority, its leadership team and its officers to manage the authority's finances in a sustainable manner.

Reporting

A financial resilience assessment will result in a clear report to the CMT and Cabinet, setting out an assessment of the Council's financial resilience, together with areas for improvement and how these could be addressed.

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Brent Council Fees and Charges Policy

1. Introduction

1.1. By using its powers to charge for goods and services and imposing fines, fixed penalties and other such financial sanctions, Brent Council is able to generate additional income to support investment in services and/or reduce the overall level of expenditure to be met by local taxpayers.

1.2. The aim of this Fees and Charges Policy is to ensure that the Council makes use of all the powers available to it in order to recover the full cost of providing services. In using these powers however, the Council will wish to take care to ensure that the consequences of charging on individuals, the wider aims of the Council itself and / or organisations do not adversely impact on those who are vulnerable or in difficulties.

2. Background

2.1. The overriding aim of the charging policy is to maximise income generation and collection to enhance the social and economic wellbeing of the community the council serves, whilst ensuring a fair price for all services reflecting the ability of the community to pay and the relative demand for the service. Maximisation of income, following a decision to charge, is also dependent on a charge being raised and that amount being collected, both in a timely way.

Legal Position

2.2. The majority of the Council's statutory services, Building Control being a key exception, are funded directly from the Council's other main sources of revenue, i.e. government grants and local taxation.

2.3. Income received by Brent from fees and charges is generated by both statutory and discretionary services. Where fees and charges apply to statutory services these are often set nationally, for example, some planning and licensing fees.

2.4. The remaining income generating services where the Council levies fees and charges are of a discretionary nature. Discretionary services are those that an authority has the power to provide but is not obliged to. They include services provided directly to the public in general such as leisure services as well as charges for the costs incurred by the council (such as legal costs) when entering into planning or highways agreements with specific persons.

2.5. The legal powers that the Council has to raise fees and charges are set out in the final section of this policy.

3. Managers' Guidance

Overview

3.1. The Managers' Guidance has been written to provide information to managers in Brent Council responsible for applying fees and charges to goods and services delivered. The aim is to encourage a consistent and cost effective approach to the setting of charges for services provided by:

a. Specifying the process and frequency for reviewing existing charges for all areas of the council's work for which charges could in principle be set
b. Providing guidance on the factors that need to be taken into consideration

when charges are being reviewed
c. Requiring more active use of market intelligence when setting charges
d. Establishing parameters for calculating different levels of charges
e. Recommending the criteria for applying concessions or discounted charges consistently across the council

Cost of Living Crisis

3.2. In response to the cost of living crisis facing Brent's residents and the current high levels of inflation and economic uncertainty, supplementary guidance was issued to managers on how to step fees and charges for 2023/24. This recognised that whilst the Council was facing substantial increases in costs, Brent's residents were also facing a similarly challenging economic environment. Whilst a freeze in fees and charges increases would not be affordable, the guidance advised managers to take a holistic approach which reviewed any proposed price increases in the round considering the effect on both the Council and its customers.

3.3. The supplementary guidance recommended a step-by-step approach to considering the extent to which the cost of providing the service was increasing for the council and the cost pressures faced by the Council's customers. These factors and any other pertinent issues would then to be considered together to determine an appropriate increase in prices. This approach permits managers to avoid following the normal full cost recovery approach if they can manage a lower level of increase within their budget. The intention was that for most fees and charges, where the Council has freedom to set the increase, the proposed increase will be below current levels of inflation.

3.4. The supplementary guidance applies only to setting fees and charges for 2023/24 and does not permanently vary the Council's policy on setting fees and charges, which is set out in this appendix. The cost of living crisis will be considered when setting fees and charges next year, but at this stage it is unclear whether there will need to be any departure from the normal process to set price increases.

Calculation of Fees and Charges

3.5. Fees and charges raised must be based on the full cost of the service. Charges cannot be set at a level to recover more than cost if that is all the Council has the legal power to do, but the definition of cost includes direct costs of service provision together with overhead and central costs. The cost recovery limit applies to the overwhelming majority of services which the Council can set a charge for. If, however, the Council has the legal power to do so careful consideration should be given to charging more than the full cost of the service. For example, charging could be used as a tool to manage excess demand for limited spaces on leisure centre classes. In overview there are 3 ways in which fees and charges may be set:

a. Fees and charges prescribed by legislation, usually in a regulatory context, and varied from time to time which the person liable has an obligation to pay;
b. Fees and charges reviewed and set by members (e.g. Individual Cabinet Members, Cabinet or Full Council) from time to time (usually annually); and
c. Fees and charges reviewed and set by officers from time to time acting under delegated powers.

3.6. As part of the annual budget cycle each department will carry out a recalculation of existing fees and charges together with opportunities to raise additional income from new areas of charging, and present proposals for revised charges.

Approvals

3.7. In broad terms setting fees for regulatory services (i.e. licensing, planning, etc) are non-executive functions. These therefore need to be submitted to Full Council for approval. Full Council can, however, delegate this function to a committee, officer etc.

3.8. Fees and charges for discretionary services are usually executive functions and therefore need to be approved by Cabinet or Cabinet Members. Cabinet and Cabinet Members can, however delegate this function.

Concessionary Charging

3.9. The purpose of offering concessions must be to support council priorities. Generally the reasons for operating concessionary charges will fall into one of two categories: to influence the level of demand for a service or to reflect the circumstances of service users. Concessions must also be reviewed at least on an annual basis, to confirm both the level of subsidy and also their ongoing relevance.

3.10. The Finance Department will maintain a list of concessions in operation and keep under review requests for concessions to be offered. For customer / clients who cannot pay, action must be taken to ensure that there are sufficient safeguards in place to allow access to service, and that appropriate steps are taken to recognise the realistic payment capacity of vulnerable individuals.

3.11. Concessionary charges should not normally apply at times when it would result in a loss of income from customers paying the full charge, unless prior approval has been given by a senior Council officer.

3.12. No concessions will be provided to non-Brent residents.

Education related services

3.13. With regards to education related services, services and packages will be based around the academic year and not on the municipal financial year.

VAT

3.14. Managers must ensure that the correct treatment of VAT is applied to the fees and charges they are responsible for. The correct treatment should be agreed with Finance in advance of application.

Other statutory requirements

3.15. Managers must also ensure that when setting fees and charges or reporting to members they are aware of any special statutory requirements that need to be complied with. For example, before changes to some fees and charges can be implemented, there may be a statutory requirement to consult and/or publish a notice in a local newspaper.

4. Payment Methods

4.1. All collection methods and payment terms must be effective, efficient and appropriate for the service. The preferred methods of payment are those direct to the bank such as direct debits and standing orders.

4.2. Wherever practical to do so payment for services provided should be sought in advance to minimise debt recovery issues.

4.3. The full cost recovery analysis will need to factor in the cost of processing payments and that some payment methods are preferred.

5. Equality impact Assessments

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 and other conduct prohibited under the Act and advance equality of opportunity and foster good relations between those who share a "protected characteristic" and those who do not. This is the public sector equality duty. The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The purpose of the duty is to enquire into whether a proposed decision disproportionately affects people with a protected characteristic. In other words, the indirect discriminatory effects of a proposed decision. Due regard is the regard that is appropriate in all the circumstances.

5.2. Before the Council exercises its fees and charging powers, the impact on individuals or groups of individuals who share a protected characteristic must be carefully considered and properly factored into the decision making process using the Council's EA screening template.

6. Review of Policy

6.1. This Policy is to be reviewed a minimum of every two years to ensure consistency with wider council and departmental objectives and priorities.

7. Fees and Charges - Legal Powers

7.1. Under the Localism Act 2011 there is a general power of competence which explicitly gives councils the power to do anything that an individual can do which is not prohibited by other legislation. This activity can include **charging** (i.e. to recover the costs of providing a discretionary service which the person has agreed to) or can be undertaken for a commercial purpose (i.e. to generate efficiencies, surpluses and profits) through a special purpose trading company. This is what is more commonly known as **trading**. Charging and trading activities can be aimed at benefiting the Council, the borough or its local communities.

7.2. These powers are in addition to similar powers set out in the Local Government Act 2003. The 2003 Act empowers councils to charge for any discretionary services (i.e. services councils have the *power* to provide but do not have a *duty* to provide by law) on a cost recovery basis. For example, the Council could decide to provide a new discretionary service, that is an addition to or enhancement of a statutory service, and then charge for it.

7.3. The 2011 Act power and the 2003 Act power cannot be used where charging is prohibited or where another specific charging regime applies. Statutory guidance published in 2003 outlines how costs and charges should be established and that guidance remains in force (see: '*General Power for Best Value Authorities to Charge for Discretionary Services'*, ODPM, 2003). The Council must have regard to the guidance when charging for discretionary services under the 2003 Act.

7.4. In particular, the guidance contains useful advice on setting charges. It explains that for each discretionary service for which a charge is made, councils need to secure that, taking one year with another, the income from charges for that service does not exceed the costs

of provision. The requirement to take one year with another recognises the practical difficulties council will face in estimating the charges. It establishes the idea of balancing the books over a period of time (not less than 1 year and no more than 3 years). Any over or under recovery that results in a surplus or deficit of income in relation to costs in one period should be addressed by the council when setting its charges for future periods so that over time income equates to costs.

7.5. The 2003 Act also enables councils to trade in activities related to their functions on a commercial basis with a view to profit through a company.

7.6. Under the Local Authorities (Goods and Services) Act 1970 councils also have powers to enter into agreements with each other and a long list of designated bodies. These activities are not limited to cost recovery and a profit can be generated from these activities.

7.7. In terms of leisure and recreational facilities, section 19 of the Local Government (Miscellaneous Provisions) Act 1976 permits councils to charge for these beyond cost recovery limitations.

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DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery) 0 to 2 Years 8am to 6pm	£325.00
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery) 2 to 3 Years 8am to 4pm	£240.00
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery) 2 to 3 Years 9am to 3pm	£180.00
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery) 2 to 3 Years 8am to 6pm	£300.00
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery) 3 to 4 Years 8am to 4pm	£220.00
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery) 3 to 4 Years 9am to 3pm	£165.00
Children and Young People	Early Help	Childcare Nursery places (Willows Nursery) 3 to 4 Years 8am to 6pm	£275.00
CHILDREN AND YOUNG PEOPLE	**GORDON BROWN OEC**		
Children and Young People	Gordon Brown OEC	Residential stays for Brent Schools	£210.55
Children and Young People	Gordon Brown OEC	Residential stays for non Brent Schools	£221.89
Children and Young People	Gordon Brown OEC	Non-residential day visit for non Brent Schools	£11.71
Children and Young People	Gordon Brown OEC	Non-residential day visit for Brent Schools	£11.71
Children and Young People	Gordon Brown OEC	Holiday Activities (per child, per day)	£29.95
Children and Young People	Gordon Brown OEC	Childrens Laser Party (per child)	£29.95
CHILDREN AND YOUNG PEOPLE	**SETTING AND SCHOOL EFFECTIVENESS SERVICE**		
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Annual package	£2,235.00
Children and Young People	Setting and School Effectiveness Service	Compliance and Governor Training Pay as you go rate (blended course rate)	£139.00
Children and Young People	Setting and School Effectiveness Service	FFT annual subscription (Primary)	Discontinued
Children and Young People	Setting and School Effectiveness Service	FFT annual subscription (Secondary)	Discontinued
Children and Young People	Setting and School Effectiveness Service	Moderation of Teacher Assessment	£665.00
Children and Young People	Setting and School Effectiveness Service	Newly Qualified Teachers - Acting as Appropriate Body for NQT Induction Standard (3 term) rate	£354.00
CHILDREN AND YOUNG PEOPLE	**Brent Music Service**		
Children and Young People	Setting and School Effectiveness Service	Brent Music Service Instrumental/vocal tuition	£729.75
Children and Young People	Setting and School Effectiveness Service	Brent Music Service Large group tuition	£808.50
Children and Young People	Setting and School Effectiveness Service	Brent Music Service Music'sCool' where class teacher remains with BMS teacher	£1,709.40
Children and Young People	Setting and School Effectiveness Service	Brent Music Service Music'sCool' where BMS teacher provides PPA cover	£2,178.75
Children and Young People	Setting and School Effectiveness Service	Brent Music Service Wider Opportunities	£1,170.75
CHILDREN AND YOUNG PEOPLE	**SHORT BREAK CENTRE**		
Children and Young People	Short Break Centre	Respite Care - Other LA (Weekday) 3pm - 9am	£688.00
Children and Young People	Short Break Centre	Respite Care - Other LA (Weekend - Friday, Saturday, School Holidays 24 hours, Sunday 3pm - 8am)	£826.00
Children and Young People	Short Break Centre	Respite Care - Other LA (Weekday, 2:1 Care)	£986.00
COMMUNITIES AND REGENERATION	**BUILDING CONTROL**		
Communities and Regeneration	Building Control	Building Regulations Table A - Charges for the erection of one or more new dwelling units (<250m2) Full Plan charge ranging from 1 - 15 units	£2,100.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Communities and Regeneration	Building Control	Building Regulations Table A - Charges for the erection of > 15 units or units > 250m2) Full Plan & Inspection charge	Individually assessed
Communities and Regeneration	Building Control	Building Regulations Table B (Domestic Single Storey Extension)	Remove
Communities and Regeneration	Building Control	Building Regulations Table C (Domestic Alterations)	£250.00
Communities and Regeneration	Building Control	Building Regulations Table D (Other Works)	£460.00
Communities and Regeneration	Building Control	Demolition Notices	£500.00
Communities and Regeneration	Building Control	Dangerous Structures	£300.00
Communities and Regeneration	Building Control	Copy of Decision Notice (Post 2002)	
Communities and Regeneration	Building Control	Copy of Section 25 PHA certificate/notice	£100.00
Communities and Regeneration	Building Control	Existing Premises Name Change -Single house or premises per property	£250.00
Communities and Regeneration	Building Control	Existing Premises Name Change –Multiple property involving more than one premises / address.	£250.00
Communities and Regeneration	Building Control	Existing Premises - Street Name Change	£1,000.00
Communities and Regeneration	Building Control	Existing Premises - Regularisation of previously unauthorised use of address / Retrospective application.	£1,500.00
Communities and Regeneration	Building Control	Building Regulations Table B (Domestic Multi Storey Extension)	£1,100.00
Communities and Regeneration	Building Control	Building Regulations Table B (Domestic Loft Conversions)	£820.00
Communities and Regeneration	Building Control	Building Regulations Table B (Domestic Basement Extension)	£1,100.00
Communities and Regeneration	Building Control	Building Regulations Table B (Domestic Single Storey Extension)	£860.00
Communities and Regeneration	Building Control	Building Regulations Table B (Domestic Multi Storey Extension)	£1,100.00
Communities and Regeneration	Building Control	Building Regulations Table B (Domestic Loft Conversions)	£820.00
Communities and Regeneration	Building Control	Building Regulations Table B (Domestic Basement Extension)	£1,100.00
Communities and Regeneration	Building Control	Conversion of Existing Building Into Self-Contained Flats/Dwelling Units - Single Unit	£840.00
Communities and Regeneration	Building Control	Retrieval of Microfiche Record	£33.32
Communities and Regeneration	Building Control	Correspondence requiring technical research / review of casefile	£133.28
Communities and Regeneration	Building Control	Complex queries requiring extensive research – individually assessed. Per Hour	£166.60
Communities and Regeneration	Building Control	Completion Certificates Pre 2002 -£80.00 PLUS £20.00 Retrieval	£200.00
Communities and Regeneration	Building Control	Completion Certificates Post 2002	£100.00
Communities and Regeneration	Building Control	Copy of Decision Notice (Pre 2002)	£120.00
Communities and Regeneration	Building Control	Copy of Decision Notice (Post 2002)	£100.00
Communities and Regeneration	Building Control	Providing Copy of SNN Decision Notice + Agreed Plans (where available)	£166.60
Communities and Regeneration	Building Control	Copy of AI Final Certificate per plot (where available)	£100.00
Communities and Regeneration	Building Control	Confirmation regarding LA acceptance of CPS record	£83.30
Communities and Regeneration	Building Control	Cancellation / Withdrawal Charge BEFORE validation	£166.60
Communities and Regeneration	Building Control	Cancellation / Withdrawal Charge AFTER validation	£249.90
Communities and Regeneration	Building Control	Cancellation / Withdrawal Charge AFTER Plans / Details or Calculations checked	Min £250 or 50% of building notice charge
Communities and Regeneration	Building Control	Calculation of refund following request where charge exceeds expenditure – refer to Fee Regulations.	£166.60
Communities and Regeneration	Building Control	Additional charge in respect of cancellation / non-payment / dishonoured cheque (refer to drawer)	£100.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Communities and Regeneration	Building Control	Cross Boundary working (including site inspections and Host Borough Administration Charge)	£100.00
Communities and Regeneration	Building Control	Supplementary Charge per hour	£199.92
Communities and Regeneration	Building Control	Resurrection Charge (or 50% whichever is greater)	£499.80
Communities and Regeneration	Building Control	Dangerous structures - Surveying Costs (09:00 to 17:00) Mon-Fri	£199.92
Communities and Regeneration	Building Control	Dangerous structures - Surveying Costs (17:00 to 09:00) Mon to Fri, Weekends and Bank Holidays (min 2 hours)	£249.90
Communities and Regeneration	Building Control	Dangerous structures - Mileage	£1.17
Communities and Regeneration	Building Control	Dangerous structures - Charge where excessive number of visits required to gain compliance	£333.20
Communities and Regeneration	Building Control	Certify and Service of formal DS Notice	£500.00
Communities and Regeneration	Building Control	Court Action (minimum fee)	£833.00
Communities and Regeneration	Building Control	Removing Danger, shoring or hoarding in accordance with London Building Acts	15% of contractors net costs
Communities and Regeneration	Building Control	Brent Administration costs in respect of contract, supervision of works, payments, etc.	15% of contractors net costs
Communities and Regeneration	Building Control	SOL numbers confirmation of address for Land registry	£100.00
Communities and Regeneration	Building Control	Existing Premises - Providing Copy of SNN Decision Notice + Agreed Plans (where available) charge per application.	£200.00
Communities and Regeneration	Building Control	Street Naming & Numbering (house/property name change)	Remove
Communities and Regeneration	Building Control	Street Naming & Numbering (Rename of street)	Remove
Communities and Regeneration	Building Control	Street Naming & Numbering (New property 1-2 plots)	£330.00
Communities and Regeneration	Building Control	Street Naming & Numbering (New property 3-5 plots)	£500.00
Communities and Regeneration	Building Control	Street Naming & Numbering (New property 6-10 plots)	£670.00
Communities and Regeneration	Building Control	Street Naming & Numbering (New property 11-20 plots)	£1,000.00
Communities and Regeneration	Building Control	Street Naming & Numbering (New property 21-50 plots)	£1,500.00
Communities and Regeneration	Building Control	Street Naming & Numbering (New property 51-100 plots)	£2,330.00
Communities and Regeneration	Building Control	Street Naming & Numbering (New property 100+ plots plots)	£2,330.00
Communities and Regeneration	Building Control	Street Naming & Numbering (New property additional charge where this includes naming a street)	£670.00
COMMUNITIES AND REGENERATION	**PLANNING**		
Communities and Regeneration	Planning	Pre-app 1 - Householder (extensions and alterations to a dwelling) (written response)	£103.50
Communities and Regeneration	Planning	Pre-app 2 - Small Minor development (I home / up to 99 sqm) (written response)	£310.50
Communities and Regeneration	Planning	Pre-app 3 - Medium Minor development (2 to 4 homes/ 100 – 499 sqm) - written and meeting	£1,200.00
Communities and Regeneration	Planning	Pre-app 4 - Large Minor development (5 to 9 homes / 500 – 999 sq.m.) - written and meeting	£2,120.00
Communities and Regeneration	Planning	Pre-app 5 - Major development (10 to 24 homes / 1,000 - 1,999 sqm) - written and meeting	£5,180.00
Communities and Regeneration	Planning	Pre-app 6 - Large major development (25 to 49 homes / 2,000 - 3,999 sqm) - written and meeting	£6,170.00
Communities and Regeneration	Planning	Pre-app 7 - Medium major development (50 to 149 homes / 3,000 - 4999 sqm) - written and meeting	£8,460.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Communities and Regeneration	Planning	Pre-app 8 - Strategic development (150 units + / 5,000 sqm) - written and meeting	£10,500.00
Communities and Regeneration	Planning	Pre-app 9 - Reserved matters (pursuant to an outline consent) - written and meeting	Half full price
Communities and Regeneration	Planning	Meeting (Pre-app 1 to 2)	£103.50
Communities and Regeneration	Planning	Revised submission from same applicant within 6 months of written feedback (Pre-app 2 to 8)	Half full price
Communities and Regeneration	Planning	Multiple options for pre-application request (pre-app 2 to 8)	Half full price
Communities and Regeneration	Planning	Issue related meeting - Major development (10+ homes, 1,000+ sqm)	£2,070.00
Communities and Regeneration	Planning	Presentation to Planning Committee	£2,070.00
Communities and Regeneration	Planning	Planning/development briefs/ frameworks/ masterplans	£9,000.00
Communities and Regeneration	Planning	Copies of planning decision notices	£25.88
Communities and Regeneration	Planning	Copies of archived documents	£25.88
Communities and Regeneration	Planning	Confirmation of compliance with clauses in a S106	£500.00
Communities and Regeneration	Planning	S106 Legal Fee (per hour)	
Communities and Regeneration	Planning	S106 Planning Negotiation Fee - Simple (1-3 obligations)	£905.00
Communities and Regeneration	Planning	S106 Planning Negotiation Fee - Moderate (4-7 obligations)	£1,540.00
Communities and Regeneration	Planning	S106 Planning Negotiation Fee - Complex (8+ obligations / review mechanisms)	£2,115.00
Communities and Regeneration	Planning	S106 Planning Negotation Fee - Simple Deed of Variation	£450.00
Communities and Regeneration	Planning	S106 Monitoring Fee - General - Non-financial contribution (Per each HoT) that's not specific under 10 units or under 1,000 sqm	£500.00
Communities and Regeneration	Planning	S106 Monitoring Fee - General - Non-financial contribution (Per each HoT) that's not specific between 10-100 units or between 1,000- 10,000 sqm	£750.00
Communities and Regeneration	Planning	S106 Monitoring Fee - General - Non-financial contribution (Per each HoT) that's not specific between in excess of 100 units or in excess of 10,000 sqm	£1,000.00
Communities and Regeneration	Planning	S106 Monitoring Fee - General - Standard Simple Obligation	5% of the total financial contribution amount up to £100,000
Communities and Regeneration	Planning	S106 Monitoring Fee - General - Standard Moderate Obligation	3% of the total financial contribution amount on the remainder of the contributions between £100,000 and £1 million

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Communities and Regeneration	Planning	S106 Monitoring Fee - General - Standard Complex Obligation	1% of the total financial contribution amount on the remainder of the contributions over £1 million. Total fees capped at £100,000 per development
Communities and Regeneration	Planning	S106 Monitoring Fee - Specific - Affordable Housing	Remove
Communities and Regeneration	Planning	S106 Monitoring Fee - Specific - Viability Review	£1,320.00
Communities and Regeneration	Planning	S106 Monitoring Fee - Specific - Sustainability	£882.00
Communities and Regeneration	Planning	S106 Monitoring Fee - Specific - Energy	£882.00
Communities and Regeneration	Planning	S106 Monitoring Fee - Specific - Sustainability and Energy	£1,764.00
Communities and Regeneration	Planning	S106 Monitoring Fee - Specific - Travel Plan	£1,884.00
Communities and Regeneration	Planning	S106 Monitoring Fee - Specific - Car Club (Off Site)	£882.00
Communities and Regeneration	Planning	S106 Monitoring Fee - Specific - Training and Employment	£882.00
COMMUNITIES AND REGENERATION	**BRENT START**		
Communities and Regeneration	Brent Start	Learning and skills - Accredited courses	£3.75
Communities and Regeneration	Brent Start	Learning and Skills - Personal and community development learning	£5.20
Communities and Regeneration	Brent Start	Learning and Skills - Personal and community development learning - concessions (A)	£2.60
Communities and Regeneration	Brent Start	Learning and Skills - Personal and community development learning - concessions (B)	£1.30
Communities and Regeneration	Brent Start	Learning and Skills - targeted community development courses	£3.75
Communities and Regeneration	Brent Start	Learning and Skills - targeted community development courses - concessions (A)	£1.90
Communities and Regeneration	Brent Start	Room hire	From £40 p/h for standard rental, £32ph for repeat/local business, £20ph for charities
COMMUNITIES AND REGENERATION	**LAND CHARGES**		
Communities and Regeneration	Land charges	Full Official Search (LLC1 and CON29 2016)	£289.80
Communities and Regeneration	Land charges	Full Official Search and each additional Parcel	£56.93
Communities and Regeneration	Land charges	LLC1	£82.80
Communities and Regeneration	Land charges	LLC1 Additional Parcel	£25.88
Communities and Regeneration	Land charges	CON 29 - 2016	£207.00
Communities and Regeneration	Land charges	Con 29 - 2016 each additional Parcel	£31.05
Communities and Regeneration	Land charges	CON 29O requested each question submitted with LLC1 and CON 29 - 2016 forms	£31.05
Communities and Regeneration	Land charges	CON 29 O each question requested separately	£41.40
Communities and Regeneration	Land charges	Copy Search of replies	£41.40
Communities and Regeneration	Land charges	CON29 O requested separately for each additional parcel	£31.05
Communities and Regeneration	Land charges - EIR	CON29 2016 Individual first question	£25.88
Communities and Regeneration	Land charges - EIR	CON29 2016 Individual each additional question	£3.11
Communities and Regeneration	Land charges - EIR	CON29 2016 Individual All questions listed on our website under Environmental Informational Regulations details 'Local Land Charges	£103.50
Communities and Regeneration	Land charges - EIR	CON29 2016 Individual each additional parcel	£6.21
Communities and Regeneration	Land charges - EIR	Copy of replies CON29 2016 individual replies	£15.53

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
COMMUNITIES AND REGENERATION	**COMMUNICATIONS**		
Communities and Regeneration	Communications	Film Licence	£100.00
Communities and Regeneration	Communications	Location Fees (high) per day	£5,000.00
Communities and Regeneration	Communications	Location Fees per day (Medium)	£3,000.00
Communities and Regeneration	Communications	Location Fees per day (low)	£2,000.00
Communities and Regeneration	Communications	Parking Fees (per parking bay suspension)	£60.00
Communities and Regeneration	Communications	Full Page Advertising in Your Brent Magazine	£1,770.00
Communities and Regeneration	Communications	Half Page Advertising in Your Brent Magazine	£973.00
Communities and Regeneration	Communications	Quarter Page Advertising in Your Brent Magazine	£643.00
Communities and Regeneration	Communications	Eighth Page Advertising in Your Brent Magazine	£275.00
Communities and Regeneration	Communications	Late Notice Admin Fee	£150.00
Communities and Regeneration	Communications	Additional/Film Officer time fee/site visits	£75 per hour
Communities and Regeneration	Communications	Film Officer out of hours fee weekdays (between 9pm-7am) and all weekend	£150 per hour
Communities and Regeneration	Communications	No Notice of Objection (subject to online payment system going ahead)	£50.00
Communities and Regeneration	Communications	Parks A Filming (large crew): Roundwood Gladstone Barham Park Fryent Country Welsh Harp	£3,500.00
Communities and Regeneration	Communications	Parks A Filming (medium crew): Roundwood Gladstone Barham Park Fryent Country Welsh Harp	£3,000.00
Communities and Regeneration	Communications	Parks A Filming (small crew): Roundwood Gladstone Barham Park Fryent Country Welsh Harp	£2,000.00
Communities and Regeneration	Communications	Parks B Filming (large crew) All other park and recreation grounds	£1,500.00
Communities and Regeneration	Communications	Parks B Filming (medium crew) All other park and recreation grounds	£1,000.00
Communities and Regeneration	Communications	Parks B Filming (small crew) All other park and recreation grounds	£500.00
Communities and Regeneration	Communications	Parks Unit base	£800.00
Communities and Regeneration	Communications	Brent Civic Centre	£5,000.00
Communities and Regeneration	Communications	Cemeteries / Libraries / Sports Centres (large crew)	£2,500.00
Communities and Regeneration	Communications	Cemeteries / Libraries / Sports Centres (medium crew)	£2,000.00
Communities and Regeneration	Communications	Cemeteries / Libraries / Sports Centres (small crew)	£1,500.00
Communities and Regeneration	Communications	Willesden Sports Centre (large crew)	£3,500.00
Communities and Regeneration	Communications	Willesden Sports Centre (medium crew)	£3,000.00
Communities and Regeneration	Communications	Willesden Sports Centre (small crew)	£2,500.00
Communities and Regeneration	Communications	Roundwood Youth Centre (large crew)	£2,500.00
Communities and Regeneration	Communications	Roundwood Youth Centre (medium crew)	£2,000.00
Communities and Regeneration	Communications	Roundwood Youth Centre (small crew)	£1,500.00
Communities and Regeneration	Communications	Housing Estates (large crew)	£2,500.00
Communities and Regeneration	Communications	Housing Estates (medium crew)	£2,000.00
Communities and Regeneration	Communications	Housing Estates (small crew)	£1,500.00
Communities and Regeneration	Communications	Temporary structures	£250.00
Communities and Regeneration	Communications	Cherrypickers / Cranes / Mobile platforms	300 + 100 per sqm deposit
Communities and Regeneration	Communications	Scaffolding	From 211 + 100 per sqm deposit for two weeks

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Communities and Regeneration	Communications	Stop / Go Traffic management	£250 per location
Communities and Regeneration	Communications	Full road closure	£2,500.00
Communities and Regeneration	Communications	Highways officer site visit	£250 per hour
Communities and Regeneration	Communications	Drone admin fee	150 per application
COMMUNITIES AND REGENERATION	**CONFERENCE AND EVENTS**		
Communities and Regeneration	Conference and Events	The Grand Hall 10 hours hire package (Monday to Sunday)	£6,490.00
Communities and Regeneration	Conference and Events	The Grand Hall 12 hours hire package (Saturday and Sunday only)	£8,910.00
Communities and Regeneration	Conference and Events	The Grand Hall 18 hours hire package (Saturday and Sunday only)	£10,780.00
Communities and Regeneration	Conference and Events	The Grand Hall additional set up or de-rig hire (per hour)	£330.00
Communities and Regeneration	Conference and Events	The Grand Hall bank holiday surcharge fee	£1,133.00
Communities and Regeneration	Conference and Events	The Grand Hall (per hour, min 6 hours required)	£660.00
Communities and Regeneration	Conference and Events	Conference Hall (per hour, min 5 hours required)	£286.00
Communities and Regeneration	Conference and Events	The Bridge (available only with the Grand Hall)	£550.00
Communities and Regeneration	Conference and Events	One Board Room (per hour)	£45.00
Communities and Regeneration	Conference and Events	Two Board Rooms together (per hour)	£90.00
Communities and Regeneration	Conference and Events	Three Board Rooms together (per hour)	£135.00
Communities and Regeneration	Conference and Events	Four Board Rooms together (per hour)	£180.00
Communities and Regeneration	Conference and Events	Foyer stall hire (8 hours)	£170.00
Communities and Regeneration	Conference and Events	Day Delegate Rate (with sandwich lunch and 3 servings of tea and coffee) per person, min numbers apply	65 *from price
Communities and Regeneration	Conference and Events	Day Delegate Rate (with finger buffet lunch and 3 servings of tea and coffee) per person, min numbers apply	65 *from price
Communities and Regeneration	Conference and Events	Charitable discount. A discount of 20% - 50% on Conference Hall and Board Rooms hire are available for charitable purpose events that are closely aligned to the Council's Borough Plan and will benefit the borough and its local residents.	25% - 50%
Communities and Regeneration	Conference and Events	Discretionary discount to attract bookings at quiet times	10% - 20%
GOVERNANCE	**LEGAL SERVICES**		
Governance	Legal Services	Third Party Charges for Legal Work - Housing Management - Residential Conveyancing. Loft cellers garden	£1,539.67
Governance	Legal Services	Third Party Charges for Legal Work - Housing Management - Residential Conveyancing. Deed of rectification	£650.48
Governance	Legal Services	Third Party Charges for Legal Work - Housing Management - Residential Conveyancing. Single Lease extension for enfranchisement of a single house	£1,424 if assessment by Tribunal then additional £75 per hour if Senior Legal Assistant or £105 per hour if Lawyer
Governance	Legal Services	Third Party Charges for Legal Work - Housing Management - Residential Conveyancing. Collective Enfranchisement	£1,424 if assessment by Tribunal then additional £75 per hour if Senior Legal Assistant or £105 per hour if Lawyer

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Governance	Legal Services	Third Party Charges for Legal Work - Housing Management - Residential Conveyancing. License for Alteration	£889.19
Governance	Legal Services	Third Party Charges for Legal Work - S106 Agreements.	£262 per hour based on minimum of £1,776
Governance	Legal Services	Third Party Charges for Legal Work - Section 38 and Section 278 Agreements.	£2,887 plus a charge rate of £261 per hour
Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions, Lease	£710 for leases between £0-£5000 per year / £948 for leases with rent between £5001.00 and £10,000 per year / £1,066 for leases with rent between £10,000 upwards
Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions. Licence to Assign	£770.40
Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions. Licence for alteration	£770.40
Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions. Licence to underlet	£770.40
Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions. Collaboration Agreement	£1,778.37
Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions. Development Agreement subject to Lease	£3,556.74
Governance	Legal Services	Third Party Charges for Legal Work - Commercial Property Transactions. S123 LGA Notice	£355.23
RESIDENT SERVICES	**PRIVATE HOUSING SERVICES**		
Resident Services	Private Housing Services	Houses in Multiple Occupation Mandatory licences	£840.00
Resident Services	Private Housing Services	Houses in Multiple Occupation Additional licences	£840.00
Resident Services	Private Housing Services	Other Houses Selective licences	£540.00
Resident Services	Private Housing Services	Admin charge for Work in Default	30% of cost of works or minimum of £150
Resident Services	Private Housing Services	Notices	£330.00
Resident Services	Private Housing Services	Specifications for Empty Property Grant	£550.00
Resident Services	Private Housing Services	DFG and SWG Agency Service	No change proposed
RESIDENT SERVICES	**LIBRARIES**		
Resident Services	Libraries	Reservations - If an item is not on the catalogue and has to be ordered	£0.00
Resident Services	Libraries	Audio Visual loans	£1.00
Resident Services	Libraries	Overdue charges on items returned late	£0.00
Resident Services	Libraries	Printing and photocopying charges	£0.20
Resident Services	Libraries	Reserved book from the British Library	£0.00
Resident Services	The Library at Willesden Green	Education Room - per hour commercial hire charges	£20.00
Resident Services	The Library at Willesden Green	Performance Space- per hour commercial hire charges	£40.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Resident Services	The Library at Willesden Green	Reading Room- per hour commercial hire charges	£20.00
Resident Services	The Library at Willesden Green	Education Room - per hour concessionary hire charges	£12.00
Resident Services	The Library at Willesden Green	Performance Space- per hour concessionary hire charges	£20.00
Resident Services	The Library at Willesden Green	Reading Room- per hour concessionary hire charges	£12.00
RESIDENT SERVICES	**SPORTS**		
Resident Services	Sports	B.Active card (Resident standard card)	£42.00
Resident Services	Sports	B.Active card (Non resident standard card)	£72.00
Resident Services	Sports	B.Active card (60+ or disabled resident Concession)	£6.75
Resident Services	Sports	B.Active card (Resident Concession - 6 months)	£3.50
Resident Services	Culture, Sports and Recreation	Sports Hall Hire - Peak	£60.00
Resident Services	Bridge Park Sports Centre	Sports Hall Hire - Juniors Peak	£45.00
Resident Services	Bridge Park Sports Centre	Sports Hall Hire - Off Peak	£36.00
Resident Services	Bridge Park Sports Centre	Sports Hall Hire - Juniors Off Peak	£27.00
Resident Services	Culture, Sports and Recreation	Dance Studio Peak	£40.00
Resident Services	Bridge Park Sports Centre	Dance Studio - Off Peak	£24.00
Resident Services	Culture, Sports and Recreation	Badminton Court Peak	£11.00
Resident Services	Bridge Park Sports Centre	Badminton Court - Off Peak	£7.00
Resident Services	Culture, Sports and Recreation	Table Tennis Peak	£6.30
Resident Services	Bridge Park Sports Centre	Table Tennis - Off Peak	£4.00
Resident Services	Culture, Sports and Recreation	Gym Membership	£25.00
Resident Services	Culture, Sports and Recreation	Gym Membership - Joint	£45.00
Resident Services	Culture, Sports and Recreation	Gym Membership - Annual	£250.00
Resident Services	Bridge Park Sports Centre	Gym Membership - concessions	£21.00
Resident Services	Bridge Park Sports Centre	Gym Membership - off peak use	£18.00
Resident Services	Bridge Park Sports Centre	Gym Membership - corporate	£24.00
Resident Services	Bridge Park Sports Centre	Gym Membership - Junior	£16.00
Resident Services	Bridge Park Sports Centre	Gym Induction - Adults	£12.50
Resident Services	Bridge Park Sports Centre	Gym Induction - Youth 14-16	£6.00
Resident Services	Culture, Sports and Recreation	Gym casual use - Adults Peak	£6.00
Resident Services	Bridge Park Sports Centre	Gym casual use - Adults Off Peak	£4.00
Resident Services	Bridge Park Sports Centre	Gym casual use - Youth 14-16	£3.00
Resident Services	Culture, Sports and Recreation	Sauna and Steam - Peak	£7.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Resident Services	Culture, Sports and Recreation	Sauna and Steam - Off Peak	£5.30
Resident Services	Culture, Sports and Recreation	Parties	from £110
Resident Services	Bridge Park Sports Centre	Junior Crs/session	£3.50
Resident Services	Culture, Sports and Recreation	Boardroom - Full Day	£65.00
Resident Services	Culture, Sports and Recreation	Community Suite - Full Day	£135.00
Resident Services	Culture, Sports and Recreation	Tropics Suite - Full Day	£195.00
Resident Services	Culture, Sports and Recreation	Syndicate Room - Full Day	£150.00
Resident Services	Culture, Sports and Recreation	Conference Room - Full Day	£225.00
Resident Services	Culture, Sports and Recreation	Function Hall - Full Day	Telephone for prices
Resident Services	Culture, Sports and Recreation	Boardroom - Per Hour	£12.00
Resident Services	Culture, Sports and Recreation	Community Suite - Per Hour	£24.00
Resident Services	Culture, Sports and Recreation	Tropics Suite - Per Hour	£35.00
Resident Services	Culture, Sports and Recreation	Syndicate Room - Per Hour	£35.00
Resident Services	Culture, Sports and Recreation	Conference Room - Per Hour	£60.00
Resident Services	Culture, Sports and Recreation	Function Hall - Per Hour	£45.00
Resident Services	Bridge Park Room Hire	Kitchen	£350.00
Resident Services	Bridge Park Room Hire	Servery	£250.00
Resident Services	Environmental Services - Commercial team	Dog Fouling Fixed Penalty	£100.00
RESIDENT SERVICES	**ENVIRONMENTAL HEALTH**		
Resident Services	Environmental Health	Contaminated Land Basic Enquiry	£66.00
Resident Services	Environmental Health	Contaminated Land Residential Property Search	£132.00
Resident Services	Environmental Health	Contaminated Land Commercial Property Search	£262.00
Resident Services	Environmental Health	Works in Default Interest Rate Bank of England Base Rate plus 8%	Bank of England rate plus 8%
Resident Services	Environmental Health	Works in Default Officer Rate (per hour subject to grade)	50.00 p/h
Resident Services	Environmental Health	Works in Default Admin Charge (Single property or shared dwellings)	£155.00
Resident Services	Environmental Health	Part B Permits for Mobile Plant and Solvent Emission Activities. Various fees as per DEFRA's charging Scheme	Various fees as per DEFRA's charging Scheme
RESIDENT SERVICES	**PEST CONTROL**		
Resident Services	Pest Control	Pest - Bedbugs (2 visits)	£241.67
Resident Services	Pest Control	Pest - Bedbugs 5-8 bedrooms (2 visits)	£275.00
Resident Services	Pest Control	Pest - Cockroaches (1 visit)	£166.67
Resident Services	Pest Control	Pest - Fleas (2 visits)	£224.00
Resident Services	Pest Control	Pest - Mice (3 visits)	£150.00
Resident Services	Pest Control	Pest - Rats (3 visits)	£150.00
Resident Services	Pest Control	Pest - Wasps (1 visit)	£68.33
Resident Services	Pest Control	Pest treatment, Pharaoh Ants	£224.00
Resident Services	Pest Control	Pest treatment, Squirrels	£150.00
Resident Services	Pest Control	Pest treatment - appointment missed/treatment not carried out	£48.00
Resident Services	Pest Control	Admin fee for offline bookings	£25.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Resident Services	Pest Control	Pest - Clothes Moths up to 3 bedrooms (2 visits booked online)	£241.67
Resident Services	Pest Control	Pest - Clothes Moths 4 - 6 bedrooms (2 visits booked online)	£275.00
Resident Services	Pest Control	Pest - Combinded rodents and cockroaches (3 visits booked online)	£240.00
Resident Services	Pest Control	Pest - Garden Ants (1 visit booked online)	£88.00
Resident Services	Pest Control	Pest - Bird Conrol	100.00-150.00 p/h
Resident Services	Pest Control	Technician Charges per hour	60.00-80.00 p/h
Resident Services	Pest Control	Treatment outside of London Borough of Brent	Discretionary Charge to Cover Additional Costs
RESIDENT SERVICES	**PUBLIC SAFETY**		
Resident Services	Animal Welfare	Collection and Return of stray dog	£ 35- £190
Resident Services	Animal Welfare	Kenneling Fees	£45 per dog
Resident Services	Animal Welfare	Vets Fees for Stray Dogs	Recharge at cost
RESIDENT SERVICES	**PUBLIC SAFETY**		
Resident Services	Public Safety	Stadium Safety Certification (General/New Style)	£110.00 p/h
Resident Services	Public Safety	Stadium Safety Certification (Special)	£110.00 p/h
Resident Services	Public Safety	Revision of Safety Certificate	£110.00 p/h
RESIDENT SERVICES	**HIGHWAYS AND INFRASTRUCTURE**		
Resident Services	Highways and Infrastructure	Failed Core Samples, Cost Neutral sample inspection	£150.00
Resident Services	Highways and Infrastructure	Section 50 Licence Application, varies on depth	£495.00
Resident Services	Highways and Infrastructure	NRSWA CAT 1+2 Roads - DfT Maximum £105	£105.00
Resident Services	Highways and Infrastructure	NRSWA CAT 1+2 Roads - DfT Maximum £240	£223.00
Resident Services	Highways and Infrastructure	NRSWA CAT 1+2 Roads - DfT Maximum £130	£130.00
Resident Services	Highways and Infrastructure	NRSWA CAT 1+2 Roads - DfT Maximum £65	£65.00
Resident Services	Highways and Infrastructure	NRSWA CAT 1+2 Roads - DfT Maximum £60	£60.00
Resident Services	Highways and Infrastructure	NRSWA CAT 3+4 Roads - DfT Maximum £75	£75.00
Resident Services	Highways and Infrastructure	NRSWA CAT 3+4 Roads - DfT Maximum £150	£150.00
Resident Services	Highways and Infrastructure	NRSWA CAT 3+4 Roads - DfT Maximum £45	£45.00
Resident Services	Highways and Infrastructure	NRSWA CAT 3+4 Roads - DfT Maximum £40	£40.00
Resident Services	Highways and Infrastructure	NRSWA Section 72 Inspection of defective reinstatement	£48.00
Resident Services	Highways and Infrastructure	NRSWA Section 72 Defective reinstatement reported	£68.00
Resident Services	Highways and Infrastructure	NRSWA Section 74 charges	varies £100 - £2,500 per day
Resident Services	Highways and Infrastructure	NRSWA Major offence (discount for early pay)	£500.00
Resident Services	Highways and Infrastructure	NRSWA Minor offence (discounted for early pay)	£120.00
Resident Services	Highways and Infrastructure	Nonrefundable admin charge Domestic Vehicle Crossing	£105.00
Resident Services	Highways and Infrastructure	Nonrefundable admin charge Industrial Vehicle Crossover	£105.00
Resident Services	Highways and Infrastructure	Crossings - White Line Access Bar <6m fixed £	£75.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Resident Services	Highways and Infrastructure	Crossings -White Line Access Bar 6-10m	£125.00
Resident Services	Highways and Infrastructure	Crossings - White Line Access Bar >10m	POA
Resident Services	Highways and Infrastructure	Crossings - Mark Up on Constructing a crossing	40% Mark up
Resident Services	Highways and Infrastructure	TM, cost of officer resource at events	4,057.33 (per event).
Resident Services	Highways and Infrastructure	Temporary Traffic Management Order	£2,419.00
Resident Services	Highways and Infrastructure	Emergency Traffic Manag. Order s14(2)	£1,238.00
Resident Services	Highways and Infrastructure	Permanent Orders	£4,083.00
Resident Services	Highways and Infrastructure	Stopping Up Orders	£5,573.55
RESIDENT SERVICES	**Highways Management**		
Resident Services	Highways Management	Provision of advice on drainage to developers prior to planning application Category A (large scale developments) - initial meeting	£4,503.42
Resident Services	Highways Management	Provision of advice on drainage to developers prior to planning application Category A (large scale developments) - follow-up meeting	£1,286.67
Resident Services	Highways Management	Provision of advice on drainage to developers prior to planning application Category B (other developments) - initial meeting	£2,860.58
Resident Services	Highways Management	Provision of advice on drainage to developers prior to planning application Category B (lother developments) - follow-up meeting	£922.08
RESIDENT SERVICES	**PUBLIC REALM (RECREATION)**		
Resident Services	Public Realm (Recreation)	Hire of pavilion per hour	£57.00
Resident Services	Public Realm (Recreation)	Hire of pavilion per hour after 8pm in Winter, after 10pm in summer per hour	£74.00
Resident Services	Public Realm (Recreation)	Partial cost recovery of events in parks - Category 2	£1,155.00
Resident Services	Public Realm (Recreation)	Partial cost recovery of events in parks - Category 3	£2,310.00
Resident Services	Public Realm (Recreation)	Reinstatement (Refundable deposit)- category 3	max.5000
Resident Services	Public Realm (Recreation)	Partial cost recovery of events in parks (ticketed events) up to 300 hundred attendees	£240.00
Resident Services	Public Realm (Recreation)	Partial cost recovery of events in parks (ticketed events) up to 600 hundred attendees	£465.00
Resident Services	Public Realm (Recreation)	Reinstatement (Refundable deposit)- category 1 (+£200)	maximum £250
Resident Services	Public Realm (Recreation)	Ad-hoc street parties and special events on non-traffic sensitive streets	Not parks
Resident Services	Public Realm (Recreation)	Regular special events	not parks
Resident Services	Public Realm (Recreation)	Special events hosted by commercial groups	Not parks
Resident Services	Public Realm (Recreation)	Circus or funfair similar in size or scope to a BSAG Category 2 event (daily fee)	funfair on lease
Resident Services	Public Realm (Recreation)	Refundable damage deposit for a circus or funfair event similar in size or scope to a BSAG Category 2 event (whole event)	adhoc
Resident Services	Public Realm (Recreation)	Circus or funfair similar in size or scope to a BSAG Category 3 event or a circus and funfair combined (daily fee)	adhoc

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Resident Services	Public Realm (Recreation)	Refundable damage deposit for a circus or funfair similar in size or scope to a BSAG Category 3 event or a circus and funfair combined (whole event)	adhoc
Resident Services	Public Realm (Recreation)	£500 -Reinstatement (Refundable deposit)- category 2 (+500)	max 2,000
Resident Services	Public Realm (Recreation)	Small Events	£73.00
Resident Services	Public Realm (Recreation)	Partial cost recovery of events in parks (ticketed events) up to 1000 hundred attendees	£1,050.00
Resident Services	Public Realm (Recreation)	Soccer Adult Single	£90.00
Resident Services	Public Realm (Recreation)	Soccer Adult Short Season [13 week pre booked]	£1,080.00
Resident Services	Public Realm (Recreation)	Soccer Adult Long Season [17 weeks pre-booked]	£1,377.00
Resident Services	Public Realm (Recreation)	Soccer Junior 11-a-side Single	£55.00
Resident Services	Public Realm (Recreation)	Soccer Junior 9-a-side Single	£48.00
Resident Services	Public Realm (Recreation)	Soccer Junior 7-a-side Single	£33.00
Resident Services	Public Realm (Recreation)	Soccer Junior 5-a-side Single	£22.00
Resident Services	Public Realm (Recreation)	Soccer Junior 11-a-side Short Season [13 week pre booked]	£643.50
Resident Services	Public Realm (Recreation)	Soccer Junior 11-a-side Long Season [17 weeks pre-booked]	£841.50
Resident Services	Public Realm (Recreation)	Soccer Junior 9-a-side Short Season [13 week pre booked]	£561.60
Resident Services	Public Realm (Recreation)	Soccer Junior 9-a-side Long Season [17 weeks pre-booked]	£734.40
Resident Services	Public Realm (Recreation)	Soccer Junior 7-a-side Short Season [13 week pre booked]	£386.10
Resident Services	Public Realm (Recreation)	Soccer Junior 7-a-side Long Season [17 weeks pre-booked]	£504.90
Resident Services	Public Realm (Recreation)	Soccer Junior 5-a-side Short Season [13 week pre booked]	£257.40
Resident Services	Public Realm (Recreation)	Soccer Junior 5-a-side Long Season [17 weeks pre-booked]	£336.60
Resident Services	Public Realm (Recreation)	Rugby Adult Single	£98.00
Resident Services	Public Realm (Recreation)	Rugby junior Single	£57.00
Resident Services	Public Realm (Recreation)	Gaelic Adult single (with changing)	£115.00
Resident Services	Public Realm (Recreation)	Gaelic Adult single (without changing)	£83.00
Resident Services	Public Realm (Recreation)	Gaelic junior single (with changing)	£68.00
Resident Services	Public Realm (Recreation)	Gaelic junior single (without changing)	£50.00
Resident Services	Public Realm (Recreation)	Hurling Adult single	£115.00
Resident Services	Public Realm (Recreation)	Hurling Junior single	£68.00
Resident Services	Public Realm (Recreation)	Cricket single	£130.00
Resident Services	Public Realm (Recreation)	Cricket Adult [11 week season]	£1,287.00
Resident Services	Public Realm (Recreation)	Cricket Junior (11 week season)	£680.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Resident Services	Public Realm (Recreation)	Cricket junior single	£68.00
Resident Services	Public Realm (Recreation)	Artificial cricket wicket (Adults) per match	£90.00
Resident Services	Public Realm (Recreation)	Artificial cricket wicket (juniors) per match	£55.00
Resident Services	Public Realm (Recreation)	Bowls - per green	£2,392.00
Resident Services	Public Realm (Recreation)	Bowls - per rink per season	£500.00
Resident Services	Public Realm (Recreation)	Tennis Court - adult, per hour	£6.00
Resident Services	Public Realm (Recreation)	Tennis Court - junior, per hour	£3.00
Resident Services	Public Realm (Recreation)	Tennis Court - where no more than 50% of players are Adults	£4.00
Resident Services	Public Realm (Recreation)	Adult training soccer/rugby/Gaelic/Hurling not on a pitch (per 2 hours including changing rooms, excluding floodlights)	£75.00
Resident Services	Public Realm (Recreation)	Junior training soccer/rugby/Gaelic/hurling not on a pitch (per 2 hours including changing rooms, excluding floodlights)	£43.00
Resident Services	Public Realm (Recreation)	Floodlights per hour	£41.00
Resident Services	Public Realm (Recreation)	Unmarked ground school/sports use (Morning or afternoon - 3 hours including changing rooms)	£71.00
Resident Services	Public Realm (Recreation)	Hire of changing rooms only (during normal staffing hours)	£0.00
Resident Services	Public Realm (Recreation)	Late cancellation fees	£0.30
Resident Services	Public Realm (Recreation)	Boot camp/ personal fitness sessions (per hour)	£0.00
Resident Services	Public Realm (Recreation)	Model Aircraft Licence Fee	£45.00
Resident Services	Public Realm (Recreation)	Volleyball	£32.00
Resident Services	Public Realm (Recreation)	Memorial bench in a park	£1,267.00
Resident Services	Public Realm (Recreation)	Indemnity - per container per week	£220.00
Resident Services	Public Realm (Recreation)	Deposit for indemnity per container	£520.00
Resident Services	Public Realm (Recreation)	Access through park land - hand tools only upto 3 hours	£75.00
Resident Services	Public Realm (Recreation)	Deposit - Access through park land - hand tools only	£150.00
Resident Services	Public Realm (Recreation)	Indemnity through land - vehicle access only (car /van) per week	£120.00
Resident Services	Public Realm (Recreation)	Deposit - Indemnity through land - vehicle access only (car /van)	£200.00
Resident Services	Public Realm (Recreation)	Indemnitys - Utility company works	£150.00
Resident Services	Public Realm (Recreation)	Deposit Indemnitys - Utility company works	£5,000.00
Resident Services	Public Realm (Recreation)	Indemnity Scaffold Licence Fee (0-10m)	£260.00
Resident Services	Public Realm (Recreation)	Indemnity Scaffold Licence Fee (10-15m)	£320.00
Resident Services	Public Realm (Recreation)	Indemnity Scaffold Licence Fee (15m+)	£520.00
Resident Services	Public Realm (Recreation)	Indemnity Hoarding Licence Fee(0-10m)	£220.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Resident Services	Public Realm (Recreation)	Indemnity Hoarding Licence Fee (10-15m)	£320.00
Resident Services	Public Realm (Recreation)	Indemnity Hoarding Licence Fee (15m+)	£520.00
Resident Services	Public Realm (Recreation)	Indemnity Skip Licence Fee (per skip per week)	£120.00
Resident Services	Public Realm (Recreation)	Skips (fines) Per skip per week	£260.00
Resident Services	Public Realm (Recreation)	Deposit for skip (per skip)	£220.00
Resident Services	Public Realm (Recreation)	Deposits for scaffolding	£320.00
Resident Services	Public Realm (Recreation)	Deposit for hoarding	£320.00
RESIDENT SERVICES	**PUBLIC REALM (WASTE)**		
Resident Services	Public Realm (Waste)	Garden Waste Collection	£60.00
Resident Services	Public Realm (Waste)	Bulky Waste Collection	£35.00
RESIDENT SERVICES	**APPLICABLE TO ONLY BRENT RESIDENTS**		
Resident Services	**Applicable to only Brent residents**		
Resident Services	Cemeteries - Brent Residents	Burial rights Carpenders Park Lawn Cemetery	£3,050.00
Resident Services	Cemeteries - Brent Residents	Burial rights Willesden New, Alperton, Paddington Old Cemetery - Reclaim	£3,650.00
Resident Services	Cemeteries - Brent Residents	Burial rights Willesden New, Alperton, Paddington Old Cemetery - New Plot	£5,575.00
Resident Services	Cemeteries - Brent Residents	Interment	£955.00
Resident Services	Cemeteries - Brent Residents	Burial rights - Path side graves Carpenders Park Lawn Cemetery	£4,665.00
Resident Services	Cemeteries - Brent Residents	Burial rights - Path side graves Willesden New, Alperton, Paddington Old Cemetery	£6,420.00
Resident Services	Cemeteries - Brent Residents	Interment - Path side graves	£955.00
Resident Services	Cemeteries - Brent Residents	Burial rights - Woodland grave for 1 interment (includes 1 tree)	£3,900.00
Resident Services	Cemeteries - Brent Residents	Woodland grave for (1 interment) Interment	£940.00
Resident Services	Cemeteries - Brent Residents	Burial rights - Woodland grave for ashes	£3,110.00
Resident Services	Cemeteries - Brent Residents	Woodland grave for ashes Interment	£350.00
Resident Services	Cemeteries - Brent Residents	Grave Reopen	£2,580.00
Resident Services	Cemeteries - Brent Residents	Vault (reopen)	£970.00
Resident Services	Cemeteries - Brent Residents	Common Grave	£2,530.00
Resident Services	Cemeteries - Brent Residents	Cremated Remains In New Half Grave Space Burial Rights & Internment	£2,470.00
Resident Services	Cemeteries - Brent Residents	Cremated Remains In existing Grave Space Interment	£360.00
Resident Services	Cemeteries - Brent Residents	Cremated remains in existing vault	£500.00
Resident Services	Cemeteries - Brent Residents	Niche in Columbaria for First Five Years	£1,000.00
Resident Services	Cemeteries - Brent Residents	Each Additional Five Years for Niche in Columbaria	£500.00
Resident Services	**Applicable to Non Brent residents**		
Resident Services	Cemeteries - Non-Residents	Burial rights Carpenders Park Lawn Cemetery	£6,400.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Resident Services	Cemeteries - Non-Residents	Burial rights Willesden New, Alperton, Paddington Old Cemetery - Reclaim	£6,610.00
Resident Services	Cemeteries - Non-Residents	Burial rights Willesden New, Alperton, Paddington Old Cemetery - - New Plot	£7,355.00
Resident Services	Cemeteries - Non-Residents	Interment	£1,650.00
Resident Services	Cemeteries - Non-Residents	Burial rights - Path side graves Path side graves Carpenders Park Lawn Cemetery	£6,540.00
Resident Services	Cemeteries - Non-Residents	Burial rights - Path side graves Path side graves Willesden New, Alperton, Paddington Old Cemetery	£7,460.00
Resident Services	Cemeteries - Non-Residents	Interment - Path side graves (earth)	£1,510.00
Resident Services	Cemeteries - Non-Residents	Burial rights - Woodland grave for 1 interment (includes 1 tree)	£5,460.00
Resident Services	Cemeteries - Non-Residents	Burial rights - Woodland grave for ashes	£3,360.00
Resident Services	Cemeteries - Non-Residents	Interment - Woodland grave for ashes	£440.00
Resident Services	Cemeteries - Non-Residents	Grave Reopen	£2,680.00
Resident Services	Cemeteries - Non Residents	Interment	£2,500.00
Resident Services	Cemeteries - Non Residents	Burial rights - Cremated Remains In new half grave space	£3,250.00
Resident Services	Cemeteries - Non Residents	Interment - Cremated Remains In new half & existing grave space	£725.00
Resident Services	Cemeteries - Non Residents	Cremated remains in existing vault	£320.00
Resident Services	Cemeteries - Non Residents	Niche in Columbaria for First Five Years	£1,500.00
Resident Services	Cemeteries - Non Residents	Each Additional Five Years for Niche in Columbaria	£750.00
Resident Services	**Applicable for both Brent residents & non residents**		
Resident Services	Cemeteries - Additional Charges	Earth Grave for 3 where applicable	£920.00
Resident Services	Cemeteries - Additional Charges	Shroud timbers & slats	£300.00
Resident Services	Cemeteries - Additional Charges	Grave surround	£260.00
Resident Services	Cemeteries - Additional Charges	Transfer burial rights	£159.00
Resident Services	Cemeteries - Additional Charges	Burial Register search fee	£60.00
Resident Services	Cemeteries - Additional Charges	Chapel hire up to 2 hours	£198.00
Resident Services	Cemeteries - Additional Charges	Saturday burials at Alperton, Paddington and Willesden	£990.00
Resident Services	Cemeteries - Additional Charges	Cancellation of an interment or late arrival of funeral cortege of more than 20 mins	£450.00
Resident Services	Cemeteries - Additional Charges	Memorial [full with Landing]	£520.00
Resident Services	Cemeteries - Additional Charges	Non Residents - Vaults Package Paddington Old Cemetery	£19,000.00
Resident Services	Cemeteries - Additional Charges	Vaults Package Paddington Old Cemetery	£16,500.00
Resident Services	Cemeteries - Additional Charges	Additional Internment of Ashes	£150.00
Resident Services	Cemeteries - Memorial Permits	Headstone / plaque	£495.00
Resident Services	Cemeteries - Memorial Permits	Inscriptions / works	£335.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Resident Services	Cemeteries - Memorial Permits	Memorial removal for interment	£450.00
Resident Services	Cemeteries - Memorial Permits	Memorial replacement after interment	£450.00
Resident Services	Cemeteries - Memorial Permits	Memorial raise and level (full memorials)	£150.00
Resident Services	Cemeteries - Memorial Permits	Memorial raise and level (plaques)	£96.00
Resident Services	Cemeteries - Memorial Permits	Tree Plaque at Carpenders Park (Inc. VAT) (Single)	£495.00
Resident Services	Cemeteries - Memorial Permits	Tree Plaque at Carpenders Park (Inc. VAT) (Double)	£535.00
Resident Services	Cemeteries - Memorial Permits	Bench with plaque on to existing landing (Inc. VAT)	£2,500.00
Resident Services	Cemeteries - Memorial Permits	Bench Plaques only at Carpenders Park (Inc. VAT - 5 years)	£420.00
Resident Services	Cemeteries - Memorial Permits	Grave tendering 1 x per year, all cemeteries except Carpenders Park	£130.00
Resident Services	Cemeteries - Memorial Permits	Grave tendering 2 x per year, all cemeteries except Carpenders Park	£190.00
Resident Services	Cemeteries - Memorial Permits	Grave tendering 1 x per year, Carpenders Park	£90.00
Resident Services	Cemeteries - Memorial Permits	Grave tendering 2 x per year, Carpenders Park	£150.00
Resident Services	Cemeteries - Memorial Permits	Concrete based bench with plaque (inc. VAT not at Carpenders Park)	£3,990.00
RESIDENT SERVICES	**ALLOTMENTS**		
Resident Services	Allotments	Allotment type site 126m2 (5 pole)	£100.00
Resident Services	Allotments	Allotment cost per pole	£20.00
RESIDENT SERVICES	**FOOD AND HEALTH & SAFETY**		
Resident Services	Food and Health & Safety	Cadaver certificate (3 working days' notice)	£73.50
Resident Services	Food and Health & Safety	Cadaver certificate (urgent next day service)	£143.00
Resident Services	Food and Health & Safety	Food Export Health Certificates (3 working days)	£75.00
Resident Services	Food and Health & Safety	Food Export Health Certificates (urgent next day service)	£142.00
Resident Services	Food and Health & Safety	Food destruction certificate	£275.00
Resident Services	Food and Health & Safety	Freezer breakdown certificate	£275.00
Resident Services	Food and Health & Safety	Pool water analysis single pool	£246.00
Resident Services	Food and Health & Safety	Pool water analysis double pool	£419.00
Resident Services	Food and Health & Safety	Schools Legionella Water Sampling	£1,610.00
Resident Services	Food and Health & Safety	Schools Drinking Water Sampling	£538.00
Resident Services	Food and Health & Safety	Food Hygiene Rating Scheme (FHRS) rating re-assessment	£318.00
Resident Services	Food and Health & Safety	Food Business Start-up Scheme	£318.00
Resident Services	Food and Health & Safety	Food Hygiene Coaching Service	£510.00
Resident Services	Food and Health & Safety	Special treatments exhibition including any treatment from categories B, C or D	1,395 plus 97.00 per applicant administering

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Resident Services	Food and Health & Safety	Special treatments - lasers (Cat A)	£890.00
Resident Services	Food and Health & Safety	Special treatments - massage, acupuncture, tattooing etc (cat B)	£725.00
Resident Services	Food and Health & Safety	Special treatments - beauty treatments, etc (Cat C)	£432.00
Resident Services	Food and Health & Safety	Special treatments - manicure, nose and ear piercing, etc (Cat D)	£238.00
Resident Services	Food and Health & Safety	Special treatments - licence variation including addition or change of therapist	£125.00
Resident Services	Food Safety	Primary Authority - bulk purchase (per hour)	£71.00
Resident Services	Food Safety	Primary Authority - pay as you go (per hour)	£88.00
Resident Services	Food Safety	Enforcement Officer hourly rate	£66.00
RESIDENT SERVICES	**LICENSING**		
Resident Services	Licensing	Animal Boarding Licence including inspection (up to 20 animals)	£355.00
Resident Services	Licensing	Animal Boarding Licence including inspection (over 20 animals)	£395.00
Resident Services	Licensing	Breeding of Dogs Licence including inspection (with one bitch)	£355.00
Resident Services	Licensing	Breeding of Dogs Licence including inspection(with more than one bitch)	£395.00
Resident Services	Licensing	Performing Animals Registration	£395.00
Resident Services	Licensing	Pet Animals (Pet Shop Licence)	£395.00
Resident Services	Licensing	Dangerous Wild Animals	£422.00
Resident Services	Licensing	Leaflet distribution (application)	£215+ 85 per person p/d
Resident Services	Licensing	Occasional sales (application) (Discretionary reduction of educational, charitable organisations)	£200 + 10.00 p/d per stall
Resident Services	Licensing	Sex establishments	£450.00
Resident Services	Licensing	Street trading (new application)	£84.00
Resident Services	Licensing	Street trading (variation)	£55.00
Resident Services	Licensing	~~Temporary Street Trading (per day per stall) up to six months shop fronts~~	£100 p/m
Resident Services	Licensing	Scrap Metal Site Licence	£650.00
Resident Services	Licensing	Scrap Metal Collectors Licence	£380.00
Resident Services	Licensing	Explosives Registration	Various Fees from £54 - £500
Resident Services	Licensing	Explosives Licence	Various Fees from £54 - £500
Resident Services	Licensing	Film Classification (per 15 minutes)	£60 minimum charge, £15 per 15 minutes thereafter
Resident Services	Licensing	Premises Licence - Licensing Act 2003 (see separate list of fees for specific charges)	Various Fees from £10.50 to £64,000
Resident Services	Licensing	Premises Licence - Gambling Act 2005 (see separate list of fees for specific charges)	Various Fees from £15 - £15,000
Resident Services	Licensing	Marriage Licence (see separate list of fees for specific charges)	Various Fees from £600 to £1,500
Resident Services	Licensing	Licensing Surgeries (to help businesses with applications)	£60 p/h
Resident Services	Licensing	Enforcement Officer hourly rate	£66.00
Resident Services	Licensing	Other Animal Inspections Fees	£100 - £135 p/h
Resident Services	Licensing	Pavement Tables and Chairs Licences	£100 (to be reviewed subject to new legislation)
Resident Services	Licensing	Casual Street Trading for Wembley Event	£200 p/d
Resident Services	Licensing	Casual Street Trading	£177 p/d
Resident Services	Licensing	Casual Street Trading (Discretionary charge for educational, not for profit or charitable organisations	£177 p/d

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Resident Services	Licensing	Temporary Shop Front (1-6 Months plus admin fee. New applications receive one months free trading if they pay for five months)	£100 p/m
Resident Services	Licensing	Temporary Independent Pitch (1-6 Months plus admin fee. New applications receive one months free trading if they pay for five months)	£3.50 p/s/m per day
Resident Services	Licensing	Permanent Shop Front (12 months plus admin fee)	£1,185 p/a
Resident Services	Licensing	Permanent Independent Pitch (12 months plus admin fee)	3.25 p/s/m per day
Resident Services	Licensing	Leaflet distribution on Sundays and Bank holidays and Wembly event day	215 + 177 per person p/d
Resident Services	Licensing	Street Trading Renewal Fee	£40.00
RESIDENT SERVICES	**PUBLIC REALM (HIGHWAYS)**		
Resident Services	Public Realm (Highways)	Temporary Crossing – Commercial:	£607.00
Resident Services	Public Realm (Highways)	Crane Oversail	£607.00
Resident Services	Public Realm (Highways)	Crane (mobile platform):	£366.00
Resident Services	Public Realm (Highways)	Scaffold Licence Fee (0-10m)	£256.00
Resident Services	Public Realm (Highways)	Scaffold Licence Fee (10-15m)	£328.00
Resident Services	Public Realm (Highways)	Scaffold Licence Fee (15m+)	£646.00
Resident Services	Public Realm (Highways)	Hoarding Licence Fee(0-10m)	£256.00
Resident Services	Public Realm (Highways)	Hoarding Licence Fee (10-15m)	£328.00
Resident Services	Public Realm (Highways)	Hoarding Licence Fee (15m+)	£646.00
Resident Services	Public Realm (Highways)	Skip Licence Fee	£61.00
Resident Services	Public Realm (Highways)	Skips (fines)	-
Resident Services	Public Realm (Highways)	Building Material licences (Residential)	£180.00
Resident Services	Public Realm (Highways)	Builders Material Licences (Commercial)	£360.00
Resident Services	Public Realm (Highways)	Skip Company - Annual Registration fee:	£327.00
Resident Services	Public Realm (Highways)	Container/Portacabin licences:	£366.00
Resident Services	Public Realm (Highways)	Admin fee for refunds processing	£66.00
Resident Services	Public Realm (Highways)	Temporary Crossing – Domestic	£180.00
Resident Services	Public Realm (Highways)	Crane /mobile platform (per week)	£547.00
Resident Services	Public Realm (Highways)	Building Material licences (Residential/week)	£49.00
Resident Services	Public Realm (Highways)	Builders Material Licences (Commercial/week)	£92.00
Resident Services	Public Realm (Highways)	Container/Portacabin licence (per week)	£164.00
RESIDENT SERVICES	**TRADING STANDARDS**		
Resident Services	Trading Standards	Registration of Premises for Auction	£360.00
Resident Services	Trading Standards	Primary Authority - bulk purchase (per hour)	£71.00
Resident Services	Trading Standards	Primary Authority - pay as you go (per hour)	£88.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Resident Services	Trading Standards	Verification of Weights & Measures Equipment (per hour)	£71.00
Resident Services	Trading Standards	Calibration of Weights for Business 9per Hour	£71.00
Resident Services	Trading Standards	Testing of Working Standards and Testing Equipment for other Las (per hour)	£71.00
Resident Services	Trading Standards	Extra Staff Member assisting with above W&M fees (per hour)	£45.00
Resident Services	Trading Standards	Use of Safety Lab (per hour)	£78.00
Resident Services	Trading Standards	Licence to store explosives	Various Fees from £54.00 - £500.00
Resident Services	Trading Standards	Financial Investigator (per hour, plus contract fee)	£45.00
Resident Services	Trading Standards	Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014, Full Charge Penalty Notice	Up to £5,000
Resident Services	Trading Standards	Penatly Charge Notice under Part 3, Chapter 3 Consumer Rights Act 2015 (Maximum Penalty)	Up to £5,000
Resident Services	Trading Standards	Full financial penalty issued under the Tenant's Fees Act 2019 (Maximum Penalty)	Up to £30,000
Resident Services	Trading Standards	Full financial penalty issued under the Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019	Up to £30,000
Resident Services	Trading Standards	Enforcement Officer hourly rate	£66.00
Resident Services	Trading Standards	Senior/Supervisory Staff hourly rate	£85.00
RESIDENT SERVICES	**Registration and Nationality**		
Resident Services	Registration and Nationality	Approved Premises Weddings Internal Saturday Before 4pm	£435.00
Resident Services	Registration and Nationality	Approved Premises Weddings Internal Saturday After 4pm	£635.00
Resident Services	Registration and Nationality	Approved Premises Weddings Internal Sunday Before 1pm	£534.00
Resident Services	Registration and Nationality	Approved Premises Weddings Internal Sunday After 1pm	£701.00
Resident Services	Registration and Nationality	Approved Premises Weddings external Monday - Friday Before 4pm	£485.00
Resident Services	Registration and Nationality	Approved Premises Weddings external Monday - Friday After 4pm	£551.00
Resident Services	Registration and Nationality	Approved Premises Weddings external Saturday Before 4pm	£551.00
Resident Services	Registration and Nationality	Approved Premises Weddings external Saturday After 4pm	£667.00
Resident Services	Registration and Nationality	Approved Premises Weddings external Sunday Before 1pm	£606.00
Resident Services	Registration and Nationality	Approved Premises Weddings external Sunday After 1pm	£788.00
Resident Services	Registration and Nationality	Bank Holidays Before 4:30pm	£1,000.00
Resident Services	Registration and Nationality	Bank Holidays After 4:30pm	£1,000.00
Resident Services	Registration and Nationality	Private Ceremonies (M- F)	£150.00
Resident Services	Registration and Nationality	Citizenship Private Ceremony-weekend	£190.00
Resident Services	Registration and Nationality	Issue of Letter	£30.00
Resident Services	Registration and Nationality	Secure Deposit	£168.00
Resident Services	Registration and Nationality	Change of date	£55.00

DIRECTORATE	SERVICE CATEGORY	SERVICE PROVIDED	23/24 PROPOSED CHARGE £ (Excl. VAT)
Resident Services	Registration and Nationality	Notice priority fee per notice	£20.00
Resident Services	Registration and Nationality	Approved Premises external Garden Monday - Friday Before 4pm	£364.00
Resident Services	Registration and Nationality	Approved Premises external Garden Monday - Friday After 4pm	£617.00
Resident Services	Registration and Nationality	Approved Premises external Garden Saturday Before 4pm	£485.00
Resident Services	Registration and Nationality	Approved Premises external Garden Saturday After 4pm	£685.00
Resident Services	Registration and Nationality	Approved Premises external Garden Sunday Before 1pm	£584.00
Resident Services	Registration and Nationality	Approved Premises external Garden Sunday After 1pm	£751.00
Resident Services	Registration and Nationality	Approved Premises Ceremonies Internal Monday - Friday Before 4pm	£314.00
Resident Services	Registration and Nationality	Approved Premises Ceremonies Internal Monday - Friday After 4pm	£567.00
CUSTOMER AND DIGITAL SERVICES	Registration and Nationality	Ceremonies Receptions (new service pending refurb)	£500.00
CUSTOMER AND DIGITAL SERVICES	Registration and Nationality	License of approved premises for civil marriage or partnership* up to 50	£700.00
CUSTOMER AND DIGITAL SERVICES	Registration and Nationality	License of approved premises for civil marriage or partnership* 51 to 100	£800.00
CUSTOMER AND DIGITAL SERVICES	Registration and Nationality	License of approved premises for civil marriage or partnership* 101 to 200	£800.00
CUSTOMER AND DIGITAL SERVICES	Registration and Nationality	License of approved premises for civil marriage or partnership* 201 to 300	£1,000.00
CUSTOMER AND DIGITAL SERVICES	Registration and Nationality	License of approved premises for civil marriage or partnership* 301 to 400	£1,100.00
CUSTOMER AND DIGITAL SERVICES	Registration and Nationality	License of approved premises for civil marriage or partnership* 401 to 500	£1,200.00
CUSTOMER AND DIGITAL SERVICES	Registration and Nationality	License of approved premises for civil marriage or partnership* Over 500	£1,600.00
Resident Services	**Community Protection**		
Resident Services	Community Protection	Processing of CCTV footage for insurance companies.	£100.00
Resident Services	Community Protection	Public Spaces Protection Order Enforcement Nuisance Vehicles .	£100.00
Resident Services	Community Protection	Enforcement of ASB Tools and Powers . Fixed penalty notices of breach of CPN.	£100.00
Resident Service	**Funeral Service**		
Resident Services	Funeral Service	Direct Cremation (Unattended Cremation)	£995.00
Resident Services	Funeral Service	Basic Burial Package (Resident)	£1,500 onward
Resident Services	Funeral Service	Basic Cremation Package (Resident)	£1,500 onward

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Budget Consultation Analysis
Summary of Key Findings

The online 2023/24 budget consultation opened on 14 November 2022 and ended on 31 January 2023.

The online consultation asked Brent residents to read the Draft Budget Plan for 2023/24, including appendices, and answer the following questions:

- Do you have any comments about our draft budget strategy?
- Having read the draft budget proposals, how much do you now feel you understand the Council's overall financial position and the need to both increase council tax and deliver savings in 2023/24 in order to deliver a balanced budget?
- To what extent do you agree or disagree with the budget proposals?
- Please provide any other comments you may have on the proposals for the 2023/24 Budget
- If you have any other ideas for ways we could save money, please specify below

In addition to the questions above standard equalities monitoring questions were asked, to better understand the demographic of the residents who responded. Please note, answering these questions was not mandatory.

The new proposals for 2023/24 are designed to limit, as far as possible, service reductions and the impact on front line services. The Budget Plan consultation aims to inform residents of the pressures faced, explain the need to reduce spending and expand on how savings will be made. The consultation aims to receive feedback on the aforementioned and capture responses to the borough's financial position.

To date, the budget plan survey has received 101 responses from the community, including residents, businesses, the voluntary sector and other key stakeholders.

Question 1

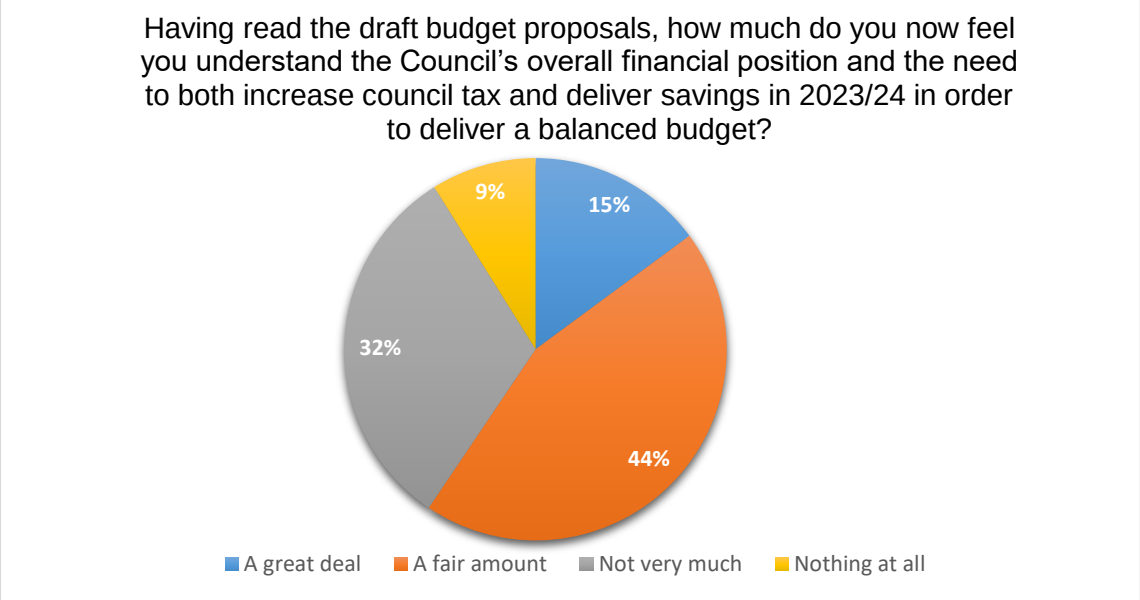
The first question in the survey asked respondents whether they had any comments about the draft budget strategy. Some key themes captured in the comments from this question are as follows:

- Concerns regarding budget cuts affecting the provision of services and the impact to residents.
- Concerns regarding the increase of council tax.

- Concerns centred on Brent Council expenditures within the organisation.

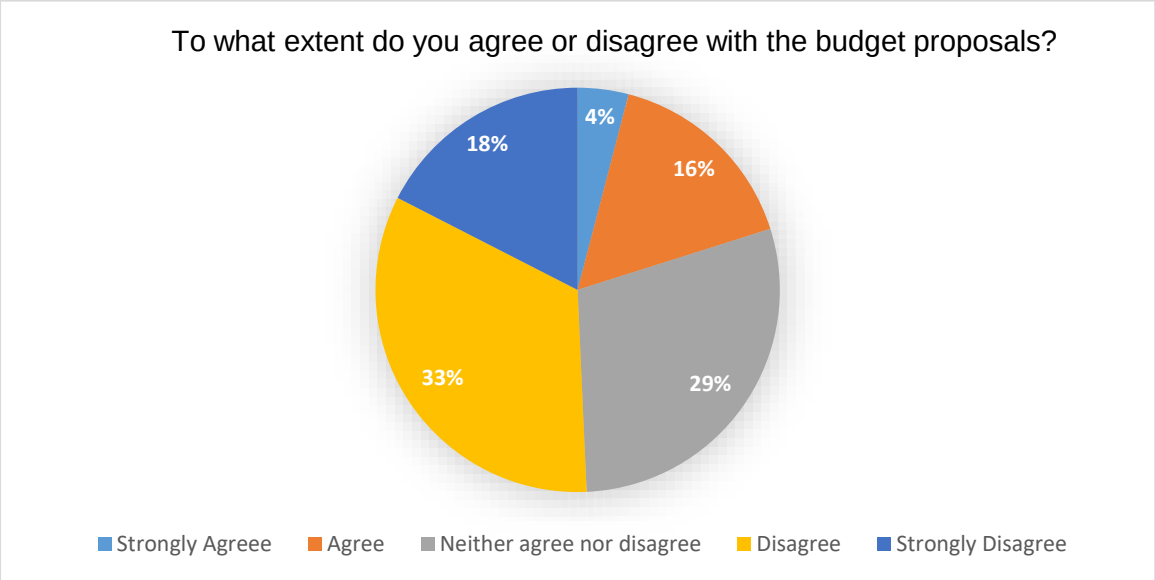
Question 2

Question 2 asked respondents to share how much they felt they understood the Council's overall financial position and the need to both increase council tax and deliver savings in 2023/24 in order to deliver a balanced budget. The data shows that **15%** of respondents feel as though they understand the Council's overall financial position '**a great deal'**. **44%** of all respondents felt that that understood the Council's position **'a fair amount'** whilst **32%** amount answered that they felt they didn't understand the Council's overall financial position very much. **9%** felt that they understood 'nothing at all' about the Council's overall financial position.



Question 3

The third question asks respondents to tell us to what extent they agree or disagree with the budget proposals. **4%** said they strongly agreed with the proposals, **16%** agreed, **29%** neither agreed nor disagreed, **33%** disagreed and **18%** answered they strongly disagreed.



Question 4

Here we asked respondents to provide any additional comments they may have for the budget proposals for 2023/24. The most popular theme for this question can be found below:

- Concerns over Council Tax increases
- Too little spending on green spaces and environmental services
- More support for adult, youth and community services

Question 5

This question asked respondents to share any other ideas for ways the Council could save money. A summary of the comments made are as follows:

- Focus on work from home agenda
- A reduction in overhead costs
- Cut back on physical marketing materials

Summary

Overall, the most common theme identified throughout the consultation survey was the concern regarding an increase in Council Tax. It is acknowledged that increasing Council Tax will be difficult for some households to manage in the current circumstances and section five the budget report set out the rationale the Council considers as part of its decision making. In summary, the increase will provide much needed funding to limit the impact inflationary pressures expected in 2022/23, in particular for the Adult Social Care department, as well as preventing the wholesale cuts key services that many other Councils are having to consider. In addition, the Council continues to invest in the Council Tax Support scheme, which provides over £32m of support for around 28,000 households who are financially vulnerable. In addition, the Council's Resident Support Fund has made available additional funds for residents who are having difficulty due to unforeseen financial circumstances as a result of the cost of living crisis.

Feedback and comments captured by the survey were varied and it is clear to see that Brent residents are concerned with what a reduction in spending means for them and their community.

Monitoring Questions

In addition to the questions above standard equalities monitoring questions were asked, to better understand the demographic of the residents who responded. Please note, answering these questions was not mandatory. A summary of responses can be found below.

A majority **(90%)** of respondents who took part in the survey answered as a Brent Resident. Organisations who answered the survey included **Brent NEU, Young Brent Foundation** and **Friends of Woodcock Park.** The most common areas the survey received responses from were; **Willesden, Cricklewood, Kingsbury and the post code area of HA9.** Respondents heard about the survey from a range of sources, however the most common source was an **email from a Brent Council Officer/Team member. 44.6%** of those who took part in the survey were female, **50.8%** were male. **95.2%** also

answered that the gender they identity with is the same as their sex registered at birth. The survey was answered most by those between the ages of **51-60**. **18.2%** of people who answered were between the ages of **61-65** and **41-50. 19.7%** were between the ages of **31-40.**

40.6% stated that they did not have a religion, **29.7%** of respondents were Christian and **15.6%** answered that they preferred not to state. **68.9%** of respondents answered they considered themselves **'heterosexual'**, **9.8%** answered they were **'gay or lesbian'** and **3.3%** stated they were **'bisexual'**. **41.3%** of those who answered belong to the **English, Welsh, Scottish, Northern Irish or British** ethnic group. The second most common ethnic group for respondents was **White other (19%),** and **14.3%** belonged to the **Indian** ethnic group. **7.9%** belonged to the **Black Caribbean** ethnic group. The most common 'other' ethnic group was **Spanish**. **80.6%** answered that English was their **first language. 14.5%** answered that **English wasn't theirs first language.**

71% do not look after or give support to anyone with long-term physical or mental illnesses, or those with problems related to old age. **17.7%** do provide support for these groups. **71%** answered that they do not have any physical or mental health conditions lasting or expected to last 12 months or longer. **22.6%** said they did. **30%** of those who answered this question preferred not to state the nature of their impairment, **25%** stated they had a **mobility impairment**, **15%** stated they had a **mental health illness** and **10%** answered that they're impairment was **physical. 78.8%** said their condition **didn't** reduce their ability to carry our day-to-day activities whilst **14.3%** answered that it **did.**

Budget Plan – Promotion

Engagement activity	Audience	Dates
Promoted across Citizens Lab	2945	18 November, 6 December and 30 December
Promoted across the Community Newsletter	7607	15 November and 23 December.
Brent Connects	135 Brent residents	31 October, 4 November, 10 November, 15 November, 17 November

Total reach**: Over 10,500 residents**

ADVICE FROM THE CORPORATE DIRECTOR OF GOVERNANCE

1. INTRODUCTION

This appendix sets out in some detail Members' individual responsibilities to set a legal budget and how Members should approach the task. It also reminds Members about the rules concerning pecuniary and other interests.

2. WHEN THE BUDGET MUST BE SET

Under Section 31A of the Local Government Finance Act 1992, budget calculations have to be made before 11th March, but they are not invalid merely because they are made on or after 11th March. However, delay in setting the Council Tax will have very serious financial consequences. It will render the Council vulnerable to legal proceedings requiring it to set the tax. In any event, it is important that the tax is set well in advance of 1st April as no sum is payable for Council Tax until 14 days after the date of posting bills. Serious financial losses will accrue very soon from a late setting of Council Tax as income is delayed and interest is foregone.

An important feature of Council Tax is that the statutory budget calculation must be followed exactly. If not the Council Tax resolution will be invalid and void.

3. SETTING OF THE COUNCIL TAX

Section 30 of the Local Government Finance Act (the Act) provides that no amount of council tax may be set before the earlier of the following—
(a) 1st March in the financial year preceding that for which the amount is set;
(b) the date of the issue to the authority of the last precept capable of being issued to it (otherwise than by way of substitute) by a major precepting authority for the financial year for which the amount is set.

This year the GLA meeting at which the precept will be set will take place in the afternoon of the 23 February 2023, which is the same day as the council's budget setting meeting at which the council tax would normally be set. In the event that the precept is not issued by the GLA by the time Council comes to make its decision on 23 February, the Council will only be able to calculate the Brent element of the council tax at that meeting.

Section 67 of the Act permits the setting of the council tax to be delegated to a special council tax setting committee established under that section. It is proposed that a meeting of the committee established under this section be called shortly after the 23 February so that the council tax can be set at that meeting in the event that it cannot be set by Council on 23 February.

4. NOTICE

There is a requirement to publish notice of the amount set for Council Tax in at least one local paper within 21 days of the Council's decision under section 38(2) of the Local Government and Finance Act 1992. There is also a duty to consult with representatives of Non-Domestic Ratepayers about the proposed revenue and capital expenditure before the budget requirement is calculated under section 65 of the Local Government and Finance Act 1992.

5. MEMBERS' FIDUCIARY DUTIES

The obligation to make a lawful budget each year is shared equally by each individual Member. In discharging that obligation, Members owe a fiduciary duty to the Council Taxpayer.

The budget must not include expenditure on items which would fall outside the Council's powers. Expenditure on lawful items must be prudent, and any forecasts or assumptions such as rates of interest or inflation must themselves be rational. Powers to spend money must be exercised bona fide for the purpose for which they were conferred and any ulterior motives risk a finding of illegality. In determining the Council's overall budget requirement, Members are bound to have regard to the level of Council Tax necessary to sustain it. Essentially the interests of the Council Taxpayer must be balanced against those of the various service recipients.

Within this overall framework, there is of course considerable scope for discretion within the 2023/24 financial year, especially on the part of the Cabinet. Setting a budget is not the same as deciding what expenditure will in fact be incurred. To budget for expenditure is to estimate likely expenditure and/or make financial provision for such expenditure. However, Members will bear in mind that in making the budget commitments are being entered which will have an impact on future years. Some such commitments are susceptible to change in future years, such as staff numbers which are capable of upward or downward adjustment at any time. Other commitments however impose upon the Council future obligations which are binding and cannot be adjusted, such as loan charges to pay for capital schemes. For some specific proposals within the overall Budgetary framework, Cabinet decisions have already been made. For some other proposals, subject to relevant consultation where necessary, decisions by the Cabinet will need to be made, especially where the making of such a decision would result or would be likely to result in the permanent closure of a facility used by the public or a permanent and significant reduction in the level of services or facilities provided to the public other than where such closure or reduction in service is considered necessary by the relevant strategic director for reasons of health and safety.

In making those subsequent decisions the Cabinet will be required to consider all relevant matters including the results of any consultation and the Council's equality duties. Should the Cabinet (or other decision maker) consider it

appropriate, for example when being asked to make service changes to achieve a budget reduction and having taken into account all relevant facts (including but not limited to the results of any consultation and after due consideration of the Council's equalities duties) they have the option of not making the budget reductions detailed within the overall budget. They will still be required to balance the budget overall using the appropriate constitutional procedures, for example, finding the savings from elsewhere or using reserves and otherwise complying with the Council's rules on budget setting and management.

Only relevant and lawful factors may be taken into account and irrelevant factors must be ignored. A Member who votes in accordance with the decision of his or her political group but who does so after taking into account the relevant factors and professional advice will be acting within the law. Party loyalty and party policy are capable of being relevant considerations for the individual Member provided the member does not dogmatically toe the party line without considering the relevant factors and professional advice and without properly exercising any real discretion.

Under the Brent Member Code of Conduct members are required when reaching decisions to have regard to relevant advice from the Corporate Director of Finance and Resources and the Monitoring Officer (the corporate Director of Governance). If the Council should fail to set a budget at all or fail to set a lawful budget, contrary to the advice of these two officers there may be a breach of the Code by individual members if it can be demonstrated that they have not had proper regard to the advice given.

6. ARREARS OF COUNCIL TAX AND VOTING

In accordance with section 106 of the Local Government Finance Act 1992 ("the 1992 Act"), where a payment of Council Tax that a member is liable to make has been outstanding for two months or more at the time of a meeting, the Member must disclose the fact of their arrears (though they are not required to declare the amount) and cannot vote on any of the following matters if they are the subject of consideration at a meeting:

(a) Any decision relating to the administration or enforcement of Council Tax.

(b) Any budget calculation required by the Local Government Finance Act 1992 underlying the setting of the Council Tax.

(c) Any recommendation, resolution or other decision which might affect the making of the Annual Budget calculation.

Members should note the following points:

(i) These rules are extremely wide in scope. Virtually any Council decision which has financial implications is one which might affect the making of the budget underlying the Council Tax for next year and thus is caught. The former DoE (now MHCLG) shared this interpretation as it made clear in its letter to the AMA dated 28th May 1992.

(ii) The rules do not apply just to full Council meetings but extend to committees and sub-committees of the Council and to the Cabinet.

(iii) Members who make a declaration are not entitled to vote on the matter in question but are not prevented by the section from taking part in the discussion.

(iv) Members will have a defence under section 106 of the 1992 Act if they did not know that the section applied to them (i.e., that they were in arrears to the relevant extent) at the time of the meeting. Thus unwitting Members who for example can prove that they did not know and had no reason to suppose at the time of the meeting that their bank has failed to honour a standing order will be protected should any prosecution arise.

(v) It is not enough to state that a benefit application has been submitted which has not yet been determined, as Members remain liable to pay pending determination.

(vi) Breach of the rules is a criminal offence under section 106 of the 1992 Act which attracts a maximum fine at level 3 on the standard scale, currently £1,000.

Members' attention is also be drawn to the effect of the Local Authorities (Standing Orders)(England)(Amendment) Regulations 2014 which came into effect on 25 February 2014 which is that where any vote is taken at a Council meeting on setting the budget for the authority, the Minutes of the meeting will record the names of all Councillors present at the vote and how each Councillor voted (for or against) or the fact that they abstained from voting.

7. DISCLOSABLE PECUNIARY INTERESTS

Members are reminded to consider whether they have a disclosable pecuniary interest or a personal interest in the setting of the council's budget. If a member has a relevant interest they must disclose the interest at the meeting, subject to the provisions in the Code in respect of sensitive interests. If the interest is:

- a disclosable pecuniary interest; or
- a personal interest which a member of the public knowing the facts would reasonably regard it as so significant that it is likely to prejudice their judgement of the public interest (and it affects their financial position or the financial position of a connected person (as defined in the Code) or relates to a regulatory matter affecting or likely to affect them or a connected person.

The member may not participate in the discussions or vote on the matter, although if the interest is prejudicial but not a disclosable pecuniary interest, the member may remain for the purposes of making representations or asking questions.

Members should seek early advice to avoid any confusion on the night of the meeting if they consider they have a relevant interest.

Dispensations

The Council's Monitoring Officer may, on written request from a Member, grant a dispensation to relieve the applicant from the restrictions on participation and voting. Dispensation may be granted if:-
- Without the dispensation the number of persons prohibited from participating would be so great a proportion to impede the effectiveness of the meeting;
- The representation of different political groups would be affected and likely to alter the likely outcome of any voting at the meeting;
- Granting the dispensation is in the interests of persons living in the Borough;
- Every Member of the Council's Cabinet would be precluded from participating in the meeting;
- It is appropriate to grant a dispensation.

Dispensation may be granted for up to 4 years. A dispensation will mean that the Member to whom it is granted can speak and vote on a matter in which they have a relevant interest. Where the Monitoring Officer is undecided on the best response, and time is not of the essence, the decision could be passed to Audit & Standards Committee for decision. There is no Audit & Standards Committee meeting currently fixed before the budget setting meeting.

8. RESPONSIBILITIES OF THE DIRECTOR OF FINANCE AND AUDITORS' POWERS

Director of Finance and Resources and Monitoring Officer

Section 114 of the Local Government Finance Act 1988 places the Director of Finance and Resources under an obligation to prepare a report (to full Council) if it appears to him that the expenditure the Authority proposes to incur in a financial year is likely to exceed its resources available to meet that expenditure. A failure to take note and act on such a report could lead to a complaint to the Standards Board. Similarly, the Council's Monitoring Officer is required to report to Full Council if it appears to her that a decision has been or is about to be taken which is or would be unlawful or would be likely to lead to maladministration.

Under section 25 of the Local Government Act 2003 the Director of Finance and resources is required to report to the authority on the robustness of the estimates made for the purposes of the calculations required to be made by the Council and the adequacy of the proposed financial reserves. These are the estimates which the Cabinet is required to determine and submit to Full Council and are contained within this report. However, if the Council were minded to agree a budget based on different estimates e.g. if Council did not agree with the estimates provided by the Cabinet then those estimates which the Council would adopt would effectively become 'the estimates' for the purpose of Section 25 and as such should be subject to a report by the Director of Finance and Resources.

External Auditors' Powers

Section 91 of the Local Government Act 2000 and section 19A of the Audit Commission Act 1998 provide that an External Auditor may issue an "Advisory Notice" if he has reason to believe that an Authority is about to take a course of action which, if pursued to its conclusion, would be unlawful and likely to cause a loss or deficiency. This power is to be used where the matter is significant either in amount or in principle or both.

While the advisory notice has effect it is not lawful for the authority to implement or take the course of action in question unless it has considered the issues raised in the notice and given the auditor notice that it intends to proceed with that course of action in a specified period and that period has expired.

In addition, it is also open to the Auditor to apply for judicial review on any decision of an Authority or failure to act which it is reasonable to believe would have an effect on the accounts of an Authority.

9. SPECIFIC BUDGET ADVICE

Balances and Other Budget Calculations

A local authority must budget so as to give a reasonable degree of certainty as to the maintenance of its services. In particular, local authorities are required by section 31A(2)(b) and (c) of the Local Government Finance Act 1992 to calculate as part of their overall budget what amounts are appropriate for contingencies and reserves. The Council faces various contingent liabilities set out in the main budget report. Furthermore, the Council must ensure sufficient flexibility to avoid going into deficit at any point during the financial year. Members will need to pay careful attention to the advice of officers here. As set out previously, under section 25 of the Local Government Act 2003 the Director of Finance and Resources is required to report to the authority on the adequacy of the proposed financial reserves.

In addition to advising on the robustness of the estimates as set out above, the Director of Finance and Resources is also required to report on the robustness of the proposed financial reserves. The same advice applies to these as to the other calculations required to be made by the Council.

Having considered the officer's report the Council is then required to *"have regard to the report"* but it is not required to adopt the recommendations in it. However, Members must demonstrate they have acted reasonably if they do not adopt the recommendations.

Localism Act 2011

Sections 72 to 79 and Schedules 5 to 7 of the Localism Act 2011 amended the legislation regarding the calculation of council tax. Schedule 5 of the Localism Act provides for a council tax referendum to be held if an authority increases its

relevant basic amount of council tax in excess of principles determined by the Secretary of State. Authorities will not be able to exceed the Secretary of State's principles without having held such a referendum. The principles applicable for 2023/24 are discussed at paragraphs 5.10 to 5.11 of the main report.

Alternative Proposals

If alternative proposals to those contained in this report are moved at the budget setting meeting, the Director of Finance and Resources will need to consider if the estimates or proposed financial reserves contained in this report are affected and whether a further report (which may be oral) is required under section 25 of the Local Government Act 2003. If the Director of Finance and Resources is unable to report on the estimates or the reserves because of the lateness of the alternative proposals then he will not be able to comply with this statutory requirement. The Act does not say what happens if this duty is not fulfilled and nor does it say whether the Council can set the budget without that advice. It follows from this then that there is no express statutory prohibition. However, the authority is at risk of a Judicial Review by an interested person, e.g. a resident, if the Council has failed to have regard to a report of the Director of Finance on the estimates and reserves used for its budget calculations.

Capital Programme

The requirements of the *"Prudential Code"* established in the Local Government Act 2003 are set out in the report.

Expenditure Charged to the Housing Revenue Account

Members will be aware that the Housing Revenue Account (HRA) is by law to be maintained separately from the General Fund and there are strict rules which determine to which account any expenditure must be charged. There are only very limited areas of discretion here. Members should bear in mind that if they wished to review any current determination which affects the apportionment of charges between the General Fund and HRA, they would need to do so on the basis of an officers' report and specific legal advice. The Housing Revenue Account must be maintained in balance throughout the year and the Council is under a duty to prevent a debit balance in the Housing Revenue Account pursuant to Section 76 Local Government and Housing Act 1989.

Equalities Legislation

Section 149 of the Equality Act 2010 sets out the public sector equality duty which requires the Council, when exercising its functions to have 'due regard' to the need to eliminate discrimination (both direct and indirect discrimination), harassment and victimization and other conduct prohibited under the Equality Act, and to advance equality of opportunity and foster good relations between

those who share a ‘protected characteristic’ and those who do not share that protected characteristic.

A ‘protected characteristic’ is defined in the Equality Act as:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race; (including ethnic or national origins, colour or nationality)
- religion or belief;
- sex;
- sexual orientation.

Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination.

Having due regard to the need to ‘advance equality of opportunity’ between those who share a protected characteristic and those who do not, includes having due regard to the need to remove or minimize disadvantages suffered by them. Due regard must also be had to the need to take steps to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and encourage those who have a protected characteristic to participate in public life.

Complying with the duty may involve treating some people better than others, as far as that is allowed by the discrimination law.

Due regard to the need to eliminate discrimination, advance equality, and foster good relations must form an integral part of the decision making process. The Council must consider the effect that implementing a particular policy will have in relation to equality before making a decision.

There is no prescribed manner in which the equality duty must be exercised. However, the council must have an adequate evidence base for its decision making. This can be achieved by gathering details and statistics on who use the facilities. A careful consideration of this assessment is one of the key ways in which the Council can show “due regard” to the relevant matters. Where it is apparent from the analysis of the information that the proposals would have an adverse effect on equality then adjustments should be made to avoid that effect (mitigation).

The duty is not to achieve the objectives or take the steps set out in s.149. Rather, the duty on public authorities is to bring these important objectives relating to discrimination into consideration when carrying out its functions. “Due regard” means the regard that is appropriate in all the particular circumstances in which the authority is carrying out its functions.

There must be a proper regard for the goals set out in s.149. At the same time, the council must also pay regard to any countervailing factors, which it is proper and reasonable for them to consider. Budgetary pressures, economics and

practical factors will often be important. The weight of these countervailing factors in the decision making process is a matter for the Council.

The equality and diversity implications of budget proposals are considered at all stages of the budget process, from the development of the initial budget strategy, through consideration of individual growth and savings proposals, to the production of service development plans. The processes in place are therefore aimed at ensuring that the budget proposals in this report do not discriminate against communities or individuals because of age, ethnicity, gender, disability, religion, or sexual orientation, and support the council in meeting its other duties to promote equal opportunities and good race relations.

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Appendix P

BRENT COUNCIL PAY POLICY STATEMENT

Financial Year 2023/24

April 2023

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BRENT COUNCIL PAY POLICY STATEMENT

Financial Year 2023/24

Purpose

The council's pay policy outlines Brent's policy on pay and benefits for all employees (excluding schools) and has been developed to meet the relevant statutory provisions of the Localism Act 2011.

The pay policy will be reviewed on an annual basis and will be approved by Full Council in advance of each new financial year.

The pay policy statement can be amended during the course of any financial year, but only by a resolution of the Full Council. The revised version of the statement will be published as soon as reasonably practicable.

Strategic Context

The current and future pay and benefit arrangements are embodied in the council's Workforce Strategy which reflects the Borough Plan priorities. The council's Borough Plan provides the strategic framework for the council's workforce and people priorities.

The overarching objective for the Workforce Strategy is to have a high performing workforce that provides the best services it can and which can truly understand and meet the needs of all our diverse communities to enable the organisation to achieve its goals for the borough.

Key priorities of the Workforce Strategy are:

- Workforce planning;
- Workforce insight and experience;
- Workforce growth and development;
- Workforce ways of working.

These priorities have been determined with the aim of achievement of the overall outcome of having and maintaining a skilled and engaged workforce.

The council is committed to being a good employer and maintaining its excellent track record in employing a diverse workforce which reflects the local community. In order to recruit and retain a high quality workforce, the council will pay its staff at appropriate salary levels to attract and retain staff, throughout the council, particularly those in hard to recruit roles.

Employee Benefits

The council's pay arrangements and terms and conditions play a key role in enabling the council to fully realise its objectives and ensuring the workforce is 'fit for purpose'. The council is committed to fair and equitable pay and benefits arrangements to maintain a flexible, talented and performance focused workforce. The council published its Gender Pay Gap Report on 21 March 2022. This revealed that the overall mean gender pay gap based on data taken from the HR databases on 31 March 2021 was 5.1% and the median gender pay gap was 5%.

All the council's pay arrangements are contained within a single policy document.

Pay Rates and Scales

Pay scales are reviewed annually in line with the relevant national agreements and any changes are usually effective from 1 April or 1 September each year depending on the pay scales applicable to different groups of staff.

The following pay scales have been adopted by the council:

- Greater London Provincial Council (GLPC) London Pay Scales (main pay scales)
- Senior Manager Pay Scales (senior managers including Chief Officers)
- Soulbury Pay Scales (Education Psychologists, Advisors and Inspectors)
- Soulbury Pay Scales (Youth and Community Service, Young People and Community Service Managers)
- Teaching Pay Scales (for centrally employed local authority teachers)

Remuneration of Senior Management (Chief Officers)

The council defines its senior management as the top 3 tiers in the management structure. This includes all statutory and non-statutory Chief Officers and Deputy Chief Officer roles. It comprises the Chief Executive, Corporate Directors and Directors.

Currently the pay, expenses and key benefits for the Council Management Team are published on the council's website. The Council Management Team comprises the Chief Executive and the Corporate Directors.

The rates of pay of the Chief Executive and Corporate Directors and other Senior Managers are in accordance with the council's senior manager pay scales. The council may, from time to time, engage senior managers under contracts for services. The council generally will aim to pay such individuals at a rate consistent with the pay of directly employed staff performing a comparable role, although there may be exceptional circumstances which support a higher pay rate for a short-term period to ensure continuity of service and meet any statutory obligations.

Remuneration of Lowest Paid Employees

The council defines its lowest paid employees as those staff paid on the lowest established grade and scale point which in Brent is Scale 1 spinal column point 1 of the Greater London Provincial Council (GLPC) Pay Scales which is currently £23,457 per annum or the pay of its lowest paid employee where they are on a higher salary which is currently £25,629.

London Living Wage

The council has implemented the London Living Wage. All staff (including Apprentices) are paid at or above the London Living Wage. The Council is an accredited London Living Wage Employer and asks its contractors supplying services to the Council to pay their staff the London Living Wage. As contractors are employers in their own right, the council cannot force contractors to pay the London Living Wage but has built into its procurement procedures a requirement to do so in relation to council contracts where possible. The Council also encourages schools to pay the London Living Wage.

Pay Multiple

The 'pay multiple' is the ratio between the highest paid salary and the lowest/median average salary of the council's workforce. The council's highest paid employee is the Chief Executive. The current median salary is £37,725.

The lowest pay multiple is 1:8.7; the median pay multiple is 1:5.9.

This is within what is regarded as good practice for the median salary multiple as described by Will Hutton in his 2011 Fair Pay Review in the Public Sector which identified multiples at or around 8.00. The council has not set a target for a maximum multiple. The lowest pay multiple has decreased from 1:10:6 in 2016/2017.

Job Grading

Single Status was introduced in 2009 for staff on the main pay scales. Single Status introduced common job evaluation schemes and pay scales for the council's former manual workers, administrative, professional, technical and clerical employees with the exception of education psychologists, nursery nurses, youth and community workers, chief officers and the chief executive.

There are some staff who transferred to the council from other organisations who have yet to move over to Single Status.

Senior managers including chief officers have locally determined rates of pay which are linked to national negotiations for the determination of pay awards. A revised pay and grading structure for senior managers was introduced on 1 April 2013. The aim of the review was to reduce costs whilst ensuring the council's pay arrangements remained competitive.

Also in 2013, the council rationalised the terms and conditions for senior managers. Those senior management posts which fall within the Joint National Committee (JNC) Chief Officer definition are employed on JNC terms and conditions and all other senior managers are employed on National Joint Committee (NJC) for Local Government Services terms and conditions with some local variations. The senior management posts which fall within the JNC definition are predominately the Corporate Directors and other directors with statutory responsibilities e.g. Section 151 officer. This means that the majority of senior managers have terms and conditions which are largely consistent with those for other staff. A number of changes were also made to the JNC for Chief Officer terms and conditions to align them more with the terms and conditions for all other staff.

Local Conventions for the GLPC Job Evaluation Scheme

Virtually all local authorities and organisations that use the GLPC Scheme have local conventions in place. A convention is the term given to the local interpretation of the wording of a job evaluation scheme, which are usually written down. Without local conventions, evaluators may interpret the scheme's factor level definitions differently.

This exposes the authority to the potential risk of inconsistency and can lead to inaccurate gradings.

The council in March 2013 introduced local conventions to ensure that the scheme is applied consistently and fairly to all employees. These have been reviewed and amended in accordance with refreshed guidance notes on the job evaluation scheme issued by the GLPC in 2016.

Pay on Appointment

All employees are normally appointed on the lowest pay spinal column point for their job evaluated grade. Employees may be appointed at a higher point, where they are currently earning more than the lowest pay spine for the role and/or where it is considered that they already possess the skills and experience needed to justify a higher salary within the grade. Appointment at a higher point on the salary scale has to be authorised by the service Director and the Head of HR or Corporate director responsible for HR.

The council delegates authority to the Senior Staff Appointments Sub-Committee to make appointments to the council of all officers at Director level and above, except for the Chief Executive, in which case a recommendation to appoint is made to Full Council for its final decision to confirm the appointment or not. The starting salary for new appointments to these posts is agreed by the body making the appointment. The starting salary for any other post where the overall remuneration package on new appointment (excluding pension contributions in accordance with the Local Government Pension Scheme regulations) is to exceed
£100,000 will normally be agreed by full council or a committee of the council unless the Chief Executive agrees otherwise.

Annual Pay Progression

Brent's pay policy is primarily based on evaluated pay grades, each having a salary range comprising a number of incremental points. Other pay grades are nationally prescribed and also have incremental progression arrangements. Most employees incrementally progress through the pay grade for their job. Progression will normally be one increment (pay spine column point) on the 1st of April each year until the top of the grade is reached for those on the main pay scales. Separate arrangements

apply during the first year of service where the start date is between 1 October and 31 March and on the anniversary of joining for those on senior manager pay scales.

Pay progression takes place on an annual basis and can be withheld if there is a disciplinary sanction or where performance is currently being addressed.

Performance Related Pay and Bonuses

Council employees including the Chief Executive and directors do not receive performance related payments or bonuses.

National / Regional Pay Agreements

The council operates the national (JNC/NJC) and regional (GLPC) collective bargaining arrangements for pay and conditions of service for all employees, including senior managers. Pay is increased in line with national and regional pay agreements.

Details of the national pay award for 2023/24 are not yet known. All proposals received from the trade unions will be considered in the context of the public sector pay freeze announced by the Chancellor in the in the 2020 Spending Review.

Market Supplements

The council re-introduced a market supplement policy in 2018 and the General Purposes Committee has agreed recruitment and retention allowances for some social work staff. Individual service areas do not have discretion to apply market supplements or other recruitment and retention payments and there is a governance structure in place to agree any new supplements based on a sound business case.

Fees for Election Duties

Election fees paid to employees (including chief officers) who assist in elections are in line with the rates agreed by the Government whenever general, regional or European elections occur. Where local elections occur fees will be determined using the cross- London agreed rates.

Pensions

All non-teaching employees are able to join the Local Government Pension Scheme (LGPS). Teachers are able to join the Teachers' Pension Scheme. Benefits for both schemes are paid in accordance with government regulations. National Health Service employees who transferred to the council under TUPE have access to the NHS Pension Scheme under special provisions agreed as part of the transfer into local

government. Employees joining Public Health after the transfer are employed on Council terms and conditions and do have access to the LGPS.

Payments on Termination of Employment

In the event that the council terminates the employment of an employee on the grounds of redundancy the terms of the council's redundancy and early retirement arrangements will apply. Termination payments are also subject to any caps or repayment requirements introduced by government legislation. Where practicable, and unless the Chief Executive agrees otherwise, termination payments which exceed £100k will normally be agreed by full council or a committee of the council. Where a termination payment includes a special severance payment, due regard will be given to Statutory Guidance on the Making and Disclosure of Special Severance Payments By Local Authorities in England.

Re-employment of Employees

Section 7 of the Local Government and Housing Act 1989 requires that every appointment to paid office or employment in a local authority shall be made on merit.

The re-engagement of employees including chief officers who are made redundant is subject to the council's re-engagement arrangements (contained within the council's Managing Change Policy). The policy sets out the minimum period a former employee must wait before being eligible to work for the council again, as well as outlining other restrictions.

Employees who are made redundant may not be re-engaged within twelve months of their termination of employment for reasons of redundancy. After twelve months the employee may be re-engaged via the normal recruitment procedures either to carry out similar work or a different job. Re-engagement is subject to the approval of the relevant Director and the Corporate Director, Governance.

Tax avoidance

All permanent Brent staff including senior managers are paid through payroll which means that all taxes are deducted at source. A review of temporary staff is regularly conducted and it is Brent's policy to cover vacancies through the use of approved agency workers or by appointing staff on fixed term contracts. Temporary workers providing services through their own companies will be carrying out projects and generally not covering permanent roles other than in exceptional circumstances e.g. where interim cover is essential whilst a permanent appointment is recruited. Where these situations do occur they will be limited in duration, usually to less than 6 months.

The council's approach to dealing with Her Majesty's Revenue and Customs' (HMRC) changes to regulations for provision of personal services from April 2017 and further changes to off-payroll working introduced in April 2021, is to use the HMRC online assessment tool to determine the employment status of individuals for income tax

purposes. Most agency workers, consultants and interims are required to pay tax on a PAYE basis, like council employees.

Publication and access to information

Brent's annual Pay Policy Statement will be published on the website where it can be easily accessed. Information about chief officers' remuneration is published on the council's website www.brent.gov.uk in the section Senior Managers' pay.

Appendix Q: Summary of the HRA Business Plan

1. Introduction

1.1 This report includes a proposal for HRA rent setting for 2023/24 and provides an update to the Housing Revenue Account (HRA) Business Plan, along with highlighting the key assumptions required to reflect national policies and financial impacts to the HRA. The business plan projections reflect the income and expenditure required to manage the landlord function and, at the same time, work towards the Council's objectives to increase Council housing supply in Brent.

1.2 This report does not attempt to summarise all aspects of the HRA business plan but aims to highlight areas where particular issues should be noted and consider options for future budget strategy.

2. National and local policies that can impact the HRA Business Plan

2.1 The HRA self-financing system for Council Housing was implemented in April 2012. Under HRA self-financing, the Council's HRA continues to be a ring-fenced account (income and expenditure) for Council dwellings. HRA self-financing is intended to allow local authority landlords to manage and maintain their own stock from the rental income they generate.

2.2 In October 2018, the government announced that the HRA borrowing cap would be lifted, revoking the previous determinations that specified local authorities' limits on indebtedness. This has provided councils with new borrowing powers to increase their housing supply, with a focus on mixed-tenure development including homes for social rent, affordable rent and shared equity products.

2.3 The Welfare Reform Act 2012 introduced radical changes to the welfare system, which included a reduction of housing benefits for social tenants if their accommodation is considered larger than required. It also introduced a new universal credit system to be implemented over time, where benefit payments would be made directly to the tenant, rather than the landlord. This change increases the risk of non-collection, which could lead to a rise in rent arrears.

2.4 The Welfare Reform Act 2016 imposed a 1% rent reduction a year for 4 years from April 2016 to March 2020. The final financial year of reductions being 2019/20. The resulting loss of rental income for Brent over this period was £23 million when compared to the income that would have been due to the Council if this was not imposed.

2.5 It was therefore necessary to make revenue savings within the HRA to compensate for the loss of rental income. A combination of these savings and the use of HRA reserves has helped to achieve a balanced budget during the period of rent reduction, as required by legislation.

2.6 In October 2017, the government announced a return to the option of increasing rent by CPI plus 1% for 5 years for all local authorities, starting in April 2020. A return to the CPI plus 1% model had helped to provide some stability and certainty over planned investment in the current stock, service improvements and new developments, at least in the short to medium-term.

2.7 Due to exceptional inflation levels and cost of living crisis experienced during 2022/23 financial year, Government published a consultation paper that proposed a cap on social housing rent increases for 2023/24 and identified other options for the level of cap, period of cap and its application. The consultation closed on 12 October 2022. On 14 December 2022 the Government issued its response to the Consultation and set a ceiling of 7% for 2023/24, compared to 11.1% if CPI plus 1% was applied. There will be a reversion to the previous rent setting arrangements from 2024/25.

2.8 The approach to be taken by the government beyond 2025 remains uncertain for all local authorities. In the absence of this information, it is assumed in the business plan that rent will remain as CPI plus 1% after 2025.

2.9 In the context of the 30-year business plan, whilst a CPI plus 1% model helps to provide some stability and certainty, it does not entirely mitigate other risks which are present in the current economic climate. Factors such as the unprecedented increases in energy and material costs, repair and maintenance contracts and anticipated wage increases, mean that any decision to set rents at less than the maximum permitted, provides a significant risk to the sustainability of the HRA. Local authorities still need to cover the inflationary pressures within the HRA whilst delivering on their operational requirements and strategic priorities, some of which are additional legislative requirements, from repairs and maintenance, to building safety, fire safety and decarbonisation. A rent cap or lower than a CPI plus 1% increase combined with increasing costs results in even greater pressure on the HRA and a likely situation of spend exceeding income generated through rent and service charge collection.

2.10 The independent review of building regulations and fire safety, also known as the Hackitt Report, was published in 2018. The report set out over 50 recommendations for the delivery of a robust regulatory system. As a result, in June 2019, the government published the ‘Building a Safer Future’ consultation detailing proposals to achieve long-term reform of the building safety system. This document sets out the government’s proposals for a reformed building safety system covering the performance of all buildings, as well as the management of fire and structural safety risks in new and existing buildings in scope.

2.11 A low-rise fire safety programme was developed by Brent Housing Management to address risks in 1,208 converted and purpose built blocks. With regard to high-rise blocks, it was decided to go over and above regulatory standards by carrying out Type 4 Fire Risk Assessments across all tower blocks over 12 storeys, the outcome of which found no fundamental issues or safety concerns.

2.12 The Council Housing Asset Management Strategy (AMS) 2022-2026 sets out a vision for responsive repairs, investment, reform and improvement of the stock and its performance. The AMS consists of a 5 year budget requirement totalling £80.8m and spend profiling for this has been incorporated into the business plan.

2.13 As part of the South Kilburn regeneration programme, the Gloucester House & Durham Court site has been redeveloped to provide 235 new affordable homes to assured social tenants. These have been occupied by Brent's residents in 2021/22. Brent Council owns the freehold and the Council's housing team, together with the Council's energy team, provide the billing for heat to the residents. The associated costs are funded by service charges and through the HRA asset management strategy, in line with other communal heating networks.

2.14 In May 2019, the UK government declared a climate change emergency, committing to target net zero carbon emissions by 2050. In July 2019, Brent declared a local climate and ecological emergency, and has committed to working towards carbon neutrality by the year 2030.

2.15 London Councils have included a target of an average EPC Band B rating for London's housing stock by 2030 as part of its joint statement with the London Environment Directors' Network on climate change. Currently, 35% of Brent's Council housing stock is performing better than the national average of Energy Performance Certificate (EPC) band D. However, 100% of housing stock falls short of EPC band B. A key feature of the borough-wide climate strategy will be to achieve an average level of EPC band B by retrofitting all housing properties by 2030.

2.16 Decarbonisation works to Council homes, including energy efficiency works that reduce demand for heat, is an important part of the AMS. The AMS plays an important role in the delivery of the Brent Climate and Ecological Emergency Strategy. Homes account for 42% of direct carbon emissions in the Borough. The target is to achieve an average EPC band B rating by 2030 for Brent council stock, as it is important that the Council leads by example. Energy efficiency works will be important in helping tenants and leaseholders with the cost of living crisis by helping to reduce fuel costs. Supporting households with the cost of living crisis is a key priority in the Council's Draft Climate Strategy Delivery Plan for 2022-2024.

2.17 Whilst major refurbishment work on tower blocks are undertaken, there are opportunities to decarbonise properties to as high a standard as is practicable and achievable targeting at least an EPC B. The five-year Asset Management Plan therefore includes climate emergency works within the tower block programme now rather than having to return in later years with associated disruption and increased costs. The Council is submitting a bid for the Social Housing Decarbonisation Funding grant. If successful, this will provide grant funding for key energy efficiency measures such as external wall insulation, high

performance windows, and renewable energy equipment. If the grant is not obtained, this will create further pressures on the HRA capital budget of circa £1.4m.

2.18 The Council has piloted retrofit works on three properties. The retrofit works included external wall insulation, internal wall insulation, installation of PV panels, upgraded the ventilation and replaced the kitchen and bathroom. Whilst the costs of the pilots were significant, this has included non-energy efficiency measures also. The results of the pilots will be considered in conjunction with the housing energy modelling exercise to identify the optimum cost-benefit level, and the various specification options available.

2.19 Brent has committed to an ambitious strategic housing target to deliver 5,000 new affordable homes over the five year period between 2019 - 2024. The 5,000 new affordable homes includes the provision of 1,000 to be delivered directly by the Council by the 31st March 2024 and a further 700 by 31st March 2028. As of November 2022, 684 homes have already been delivered, with more in the pipeline. The current baseline business plan has incorporated the expected delivery of an additional 354 new homes, along with the associated income and expenditure.

2.20 Following the identification of urgent remedial works required to Granville New Homes, Cabinet reviewed the proposed options presented in October 2021. It was agreed to dispose of the blocks at Granville New Homes owned by First Wave Housing (FWH) to the Council's HRA, subject to a consultation with residents. The transfer was finalised on 1 April 2022, which involved the transfer of 84 social housing and 1 leasehold property, along with associated income and expenditures to maintain the stock. Remediation works estimated at £15.4m has been incorporated into the business plan.

3. Rent setting proposal for 2023/24

3.1 The table below shows a snapshot of current average rent levels containing Social and Affordable Rent from occupied properties and the proposed increase of 7% for 2023/24. All re-lets are charged at Formula rent and new builds are charged at Formula or London Affordable rent. Updated rent levels are reflected in the current average rent in 2022/23 and can change depending on time of reporting. The average proposed rent rate for 2023/24 is £8.72 per week (7%) higher than the current financial year.

Proposed Tenant Rents for 2023/24

Bed Size	Current average rent 2022/23	Proposed average rent 2023/24 (7%)	Rent uplift
	£	£	£

Bedsits	92.05	98.49	6.44
1	109.43	117.09	7.66
2	126.85	135.72	8.87
3	138.38	148.06	9.68
4	149.83	160.31	10.48
5	161.90	173.23	11.33
6+	170.08	181.98	11.90
Average rent	**124.70**	**133.42**	**8.72**

3.2 A rent increase of 7% is estimated to result in additional £3.5m of income when compared to 2022/23. This is estimated to be £2m less in income when compared to the previous policy of CPI plus 1 (11.1%). In real terms, this will be the third biggest annual reduction in social housing rents since the introduction of rent restructuring two decades ago. Like most other housing providers, difficult decisions will need to be made to reduce costs in order to close the gap between rental income and increasing cost of service delivery. Brent Housing Management services have identified a target of £3m cost reductions that are incorporated into the budget set for 2023/24 and the business plan.

3.3 For tenants that are in receipt of housing support to help pay their rent, the cost of a rent increase will be met by their housing benefit or the housing element of universal credit, unless the level of support is reduced by factors that may apply to individual circumstances, such as a benefit cap. Brent Housing Management provide support to tenants who are struggling to pay their rent. The primary objective is to ensure that tenants have all the support that they can get, rather than pursuing an eviction. Support options include assessing whether the tenant is claiming all the welfare benefits that they are entitled to, assisting them to claim from the Council's Resident Support Fund and arranging a suitable payment plan. After the onset of the COVID-19 pandemic, Brent Housing Management endeavoured to identify vulnerable tenants and have since kept in contact with tenants in order to ensure that they continue to get the required support to sustain their tenancy.

3.4 The net rent amounts exclude service charges. Service charges are a recharge to tenants and leaseholders based on actual costs incurred in providing specific services, such as estate cleaning.

3.5 It is recognised that cost of living crisis and increased rental charges can have an adverse impact on the level of rent collections. Approximately 40% of rent charges are covered through housing benefit payments, which is estimated at £20m. The remaining 60% of income estimated at £30m are paid directly by tenants who are in employment or in receipt of universal credit and would be at risk of non-collection.

3.6 Collection rates 2022/23 on average, stood between 95% - 96%. If this level of rent collection remained consistent for the year, this would result in an additional

budget requirement of £2.4m in order to allow for potential non-payments. The Council's Resident Support Fund helps to alleviate some of financial hardship being faced by tenants. However, collection rates are still expected to continue to be impacted. For every 1% drop in collection, the loss of income is estimated at £0.5m. Bad debts have been assumed at 2% of rental income per annum over 30 years, this equates to an average £1.8m rent loss per annum over the course of the business plan.

3.7 Supervision and management costs include allowances for pay inflation uplifts in the business plan. An assumed 6% inflation, similar to current year, is estimated to amount to an additional £0.7m budget requirement in 2023/24 compared to previous year. Future pay inflations have been assumed at 4% in year 2 and 3% per annum after that in the business plan.

3.8 Repairs, maintenance and general costs include annual inflationary uplifts. The general cost inflations in the business plan are assumed at 2% in year 2, followed by a reduction to 1% in year 3, during possible negative inflationary period forecasted by Office of Budget Responsibility (OBR). The following years are assumed to increase gradually to 3.5% from year 7 onwards.

3.9 From financial year 2023/24, there is an increased focus on energy efficiency works and major works to tower blocks. The business plan has incorporated £40m over the next three years on tower block refurbishment programme. The blocks are Kilburn Square, Lodge Court, Manor Court and Windmill Court. These blocks were built in the late 1960's and whilst they have had repairs and refurbishment undertaken over the last 60 years, there are further investment required in order to increase the estimated life of the blocks by more than 40 years.

3.10 Efficiency savings targets are incorporated into the budget setting process and business plan, in line with the Council's overall budget setting process. A 0.5% efficiency target across management and repairs is assumed in the business plan in the first 5 years, followed by 1% over the course of the remaining 25 years, equating to an average saving of £0.3m per annum over 30 years. This saving target is following significant cost reduction of £3m incorporated into budget setting for 2023/24 and is equivalent to 10 years worth of efficiency saving projections in the business plan.

3.11 The HRA business plain aims to set aside appropriate funds and incorporate a voluntary debt repayment policy that mirrors the General Fund approach. The calculations involve profiling debt repayments for new builds over 60 years, and debt repayment for major works over 25 years, based on the rate of borrowing for the debt. The repayment modelling commences from debt incurred in 2019/20 onwards, reflecting the period when HRA borrowing exceeded a previously set debt cap of £199.3m. In practice, repayments will be possible in years where there is capacity within accumulated operating reserve.

3.12 HRA operating reserve as at 31st March 2022 was £0.4m, and it is not anticipated to be used while rent increases are set at CPI plus 1%. The opening reserve balance has reduced by £0.9m compared to last year, due to partially funding a provision in 2021/22 for identified capital works to the Granville New Homes blocks that have transferred to the HRA from First Wave Housing on 1st April 2022. HRA reserves were used to cover the timing difference and the provision will be released when works commence, returning the HRA reserve to the previous value of £1.3m.

3.13 Currently, the business plan model aims to achieve a minimum operating reserve balance that represents an estimated 3% of rental income, which is approximately £1.6m in 2023/24. The operating reserve balance of £1.3m is not projected to reduce, however due to increased cost pressures in the current economic climate, a rent cap of 7%, along with increased investment to improve high rise blocks in line with the AMS, target reserve levels are projected to be achieved from year 6 onwards, at an estimated balance of £1.9m. The operating reserve is necessary to manage unexpected deficits, or for smoothing in-year budget pressures due to timing differences between the cost of building new homes and receiving rental income, so that it can offset the increased borrowing costs. In addition to the need for the HRA to balance competing demands, such as investing in supply of new homes, the Covid-19 pandemic and inflation has further stressed the importance of maintaining adequate level of reserves.

4. Summary of key assumptions in the HRA Business Plan

4.1 The HRA business plan provides long-term financial forecasts resulting from the implications of the Council's spending, investment and rent-setting decisions, based on the authority's current income, expenditure and investment expectations. The data is combined with key assumptions on how costs and income might change in the future to illustrate what the authority can reasonably expect to happen, using the best available information.

4.2 Regular review of assumptions is important in order to help the Council to make early decisions that help keep the HRA in balance, whilst also delivering substantial levels of investment in Council housing.

4.3 A summary of the key assumptions that underpin the 30 Year Business Plan are presented below:

Description	How it impacts the Business Plan	Assumptions used in the Business Plan
HRA stock movements	Projected rental income is based on stock numbers	Baseline stock numbers in the current year are adjusted for projected RTB sales and new affordable housing supply

Description	How it impacts the Business Plan	Assumptions used in the Business Plan
Inflation on supplies and services	All income and expenditure is adjusted for inflation to reflect general cost increases. CPI forecast is based on rate in September of previous year.	Rental income uses CPI, all other expenditure is assumed at RPI. CPI 6% in year 2, reducing to 2% from year 7 onwards. RPI 2% in yr 2, reducing to 1% in yr 3, then gradually increasing to 3.5% from year 7 onwards.
Minimum Working Balance	Target level of minimum reserve for any overspends	Working balance requirements assumed at 3% of income giving circa £1.6m
Rental Income	Tenant rent projections are driven by stock numbers and average rent. Tenant rent is the largest source of income for the HRA	Average rent is currently set at £133 per week. Rent is adjusted as per government policy. Assumed CPI+1% for duration of business plan
Supervision and Management Costs	Rental income is allocated to management costs of providing a landlord service	Cost assumed to increase by RPI each year
Service Charges	Cost of specific services are charged back to tenants and leaseholders	Service charge uplift is in line with anticipated cost increases at RPI
Voids	Level of void properties have an impact on rental income that can be charged	Rent loss though voids is estimated at 1% of rent
Bad Debts	Rent arrears that are not collected results in loss of income	Assumed on average 2% of rent
Repairs and Maintenance Costs	Rental income is allocated to repairs budgets	Expenditure is adjusted in line with RPI and stock movements

Description	How it impacts the Business Plan	Assumptions used in the Business Plan
Right to Buy Sales	Stock reductions reduce rental income and set a target for the Council to achieve 1-4-1 replacements	Projected 15 sales per annum
Interest rate on borrowing	Rental income is allocated to financing debt	New debt is assumed at interest rates of 5.2% in year 1, gradually reducing to 3.5% from year 4 onwards
Capital Programme - Major Works	Investment to maintain housing stock	Profiling over first 4 years based on Asset Management Strategy. Asumed £15m per annum from year 5 onwards.
HRA Debt Balance	The HRA debt balance as at 31st of March 2022 was £268m.	Accumulated reserve balances will determine capacity for debt repayments
RTB Receipts	Rolling five year spend targets are set by MHCLG based on RTB sales	It is currently assumed in the business plan that spend targets will be met to achieve 1-4-1 replacement of homes.
Affordable Housing Supply	The Council has committed to providing 1,700 affordable homes by 31 March 2028	The current baseline business plan assumes 354 new affordable homes with an estimated cost remaining in the business plan of £51m over 6 years.
Efficiency Savings	Savings contribute towards offsetting budget pressures	0.5% first 5 years then 1% efficiency savings target across revenue costs for management and repairs

5. Sensitivity Analysis

5.1 Alongside the baseline assumptions, sensitivity analysis have been undertaken to explore the impact on reserve balances from a range of assumptions. Considering each of these in turn enables to read the baseline financial projections in the context of potential changes, and so gives an indication of key risks. The key sensitivities analysed are:

A) Baseline assumptions

B) RPI cost inflation 0.5% higher in years 2 to 4

C) Repairs and major works 1.5% higher than inflation in years 2 to 4

D) Rent freeze imposed from 2025/26 for 4 years

E) Voids and bad debts 0.5% higher from year 2 onwards

F) CPI reduction by 0.5% from year 7 onwards

5.2 The sensitivity analysis demonstrates that:

A) Baseline assumptions avoid deficits over 30 years with a projected reserve balance of £134.4m in year 30.

B) Cost inflations to RPI for all expenditure items, between years 2 to 4 from current economic uncertainties absorb inflations in the short-term at 0.5% higher than baseline; this is projected to result in a reduced reserve balance in year 30 at £115.2m (£19.2m less than baseline).

C) Repair cost inflations of 1.5% above baseline from year 2 to 4, are projected to be absorbed within the business plan model, if all other baseline assumptions remain consistent. The reserve balance in year 30 is projected to be £79.1m (£55.3m less than baseline).

D) A 4 years rent freeze from 2025/26 can have a significant impact on the health of the business plan, particularly in the immediate short-term, resulting in projected budget deficit totalling £28m, making it unviable over 30 years without mitigating cost reduction being identified.

E) Rental income inflations assumed in the baseline are projected to absorb 0.5% increases to voids (1% baseline) and bad debts (2% baseline) over the life of the business plan. The projected 30-year reserve balance is £109.1m (£25m less than baseline).

F) If average annual CPI was to reduce by 0.5% to 1.5% from year 7 onwards, average rental income inflation per annum will be 2.5% per annum. The impact of this will lead to a budget deficit of £7m in the business plan, making it unviable over 30 years without mitigating cost reductions being identified.

6. Risks

6.1 The business plan is based on a set of assumptions, and there will always be an element of risk of significant changes in cashflow projections in the revenue and capital accounts, if any of the assumptions fail to materialise.

6.2 The main variables that could affect the long-term viability of the Business Plan are rent levels and long-term major works and repairs. There has already been a change to the Council's power to increase rents annually up to a maximum of CPI plus 1%, with an introduced rent rise limitation of 7%, and after April 2025, the implications of future Government regulated rent policy remain uncertain.

6.3 War in Ukraine, the long-term impact of COVID-19, Brexit, high levels of inflation, labour shortages and rising interest rates present the Council with a volatile and uncertain economic environment. The cost of living crisis will impact residents of Brent and the Council is committed to doing what it can to support those in greatest need. Cost pressures and risk of income collection losses are continuously monitored.

6.4 Inflation is running at such high levels that have not been seen since the 1980's. Besides rising energy costs, other goods are also experiencing increases in prices, due to factors such as labour shortages, pay rises, logistics issues and a general trend to increase prices and restore profit margins where previously slumps in demand had suppressed price levels.

6.5 In September 2022 CPI stood at 10.1% against a Bank of England target of 2%. The September inflation figures are important as they are used for the following years uplift on formula rent levels, 2023/24 being an exception with a 7% ceiling. The gap between inflation on rent levels and inflation on costs is a significant risk to the long-term business plan. Inflation rates assumed in the current business plan is informed by projections from the Office for Budget Responsibility (OBR), which is forecasting a likely period of negative inflation in the short-term. For business planning purposes, negative inflation has not been modelled for expenditures in order to allow some room for uncertainty, while at the same time inflation on rent has been modelled in line with OBR projections.

6.6 The impacts of Universal Credit and cost of living crisis can affect the HRA Business Plan, as the number of rent arrears may increase considerably. A number of mitigations are in place to help support tenants with universal credit such as:

- Continuing raising awareness with residents about Universal Credit, including what it means for them
- Developing future delivery partnership with DWP
- Establishing delivery partnership agreement that supports the most vulnerable
- Increasing provision for digital inclusion and improve capacity for residents to manage accounts independently
- Continuing to review strategy for maximising rent collection that reflects Universal Credit implications for transition and full service
- Investing in technology to optimise operating process and generate efficiencies

6.7 As the Council adds more stock to its portfolio and complexities of new additional requirements to building standards are increasing, such as fire safety works and climate change, the cost of major works is rising. At the moment, there is insufficient government subsidy available to address these changes. The Asset

Management Strategy and investment plans must be approached cautiously and allow for flexibility to scale back on schemes where required.

6.8 Impacts of national housing policies and any changes proposed in future Government papers can have an adverse impact on the HRA and could require additional resources to address any unexpected changes.

6.9 Whilst the Council is confident in its ability to continue delivering affordable homes for Brent residents, there are social and economic factors, which are increasingly placing pressure on both current schemes that are on site and those in the Council's pipeline. Brexit, rising inflation, a continued shortage of labour, materials and events such as the Covid-19 pandemic and the war in Ukraine have had an adverse effect on costs and therefore the financial viability of each capital scheme. The Government reported an increase of 23% on materials such as steel, timber and concrete last year alone. The Council was previously using a build cost of circa £2,000 - £2,500 per sqm to test financial viability. From 2022/23, the Council is using a build cost of £3,000 - £3,500 per sqm to test viability of schemes in the New Council Homes Programme. The Council also applies a 10% contingency to each schemes estimated build costs in order to mitigate against inflationary rises when assessing viability.

6.10 The HRA debt cap has been removed and significant borrowing is required to invest in stock in order to increase housing supply in Brent. The HRA is exposed to interest rate fluctuations, which can have a significant impact on revenue budgets and the overall business plan. Brent Council operates a one-pool approach to its borrowing, where the HRA receives a proportion of the Council's overall borrowing but with a reduced rate. Having remained at 1% or less since February 2009, base rates began rising in June 2022. The forecast borrowing rate for the HRA is informed by the Bank of England Monetary Policy, with projections for base rates to peak in 2023/24. Interest rates for new borrowing in the HRA are currently assumed at 5.2% in 2023/24, with a gradual reduction annually to 3.5% from 2026/27 onwards.

6.11 Spend targets for 1-4-1 receipts set by Government mean that the Council may need to transfer receipts with compounded interest, if spend targets are not met within 5 years of receiving the receipt. There is currently sufficient schemes in pipeline to be able to utilise receipts towards adding affordable housing in Brent.

6.12 There are also demographic changes and a general recognition that there should be better integration of housing, social care and health services. As time goes on, a proportion of the population who are elderly or vulnerable increases and there is an increased need for appropriate housing. However, with limited clarity on the government's funding of supported housing, it is likely that the problem of how to house vulnerable elderly people will intensify.

Brent	**Cabinet** 6th February 2023
	Report from Corporate Director of Finance & Resources

Purchase of 294 Homes at Fulton Road, Wembley, HA9 0TF

Wards Affected:	Wembley Park
Key or Non-Key Decision:	Key Decision
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	Two Appendix 1: Site Plan Appendix 2: Fulton Road CGI image
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Hakeem Osinaike Director of Housing 020 8937 2023 Hakeem.Osinaike@brent.gov.uk Tanveer Ghani Director of Property & Assets 020 8937 1722 Tanveer.Ghani@brent.gov.uk

1.0 Purpose of the Report

1.1 This report seeks permission to purchase the long leasehold interests of 999 years (less 3 days) in 294 homes (flats) located on the former Euro Car Parts site, Fulton Road, Wembley, HA9 0TF from Crown Wembley LP who is the vendor.

1.2 The total budget required to purchase the 294 homes including professional fees, disbursements, exclusive of Stamp Duty Land Tax and exclusive of VAT is £85.6m.

1.3 Crown Wembley LP, as the site vendor, will grant the Council a 999-year lease (less 3 days) at a peppercorn rent on completion of the lease for the 294 homes. Regal Homes Management Limited, as the development manager for the site, will continue to insure the premises during the construction and until completion of the construction of the 294 homes, currently anticipated as 1st July 2026.

2.0 Recommendation(s)

That Cabinet:

2.1 Approve a budget of £85.6m plus VAT (if any) to purchase the long leasehold interest in 294 homes from Crown Wembley LP, subject to contract and subject to a) clean and marketable title b) financial and legal due diligence and c) vacant possession, with a target completion date in March 2023; and;

2.2 Delegate authority to the Corporate Director of Finance & Resources in consultation with the Finance, Resources & Reform to negotiate and agree the terms and thereafter enter a development sale and purchase contract with the vendor for the purchase of these homes by way of a long lease of 999 years (less 3 days).

2.3 Note the Corporate Director, Finance & Resources using powers delegated under the Constitution will tender and award relevant contracts for professional services relating to the construction supervision of the 294 homes that will be transferred to Brent Council.

2.4 Delegate authority to the Corporate Director, Resident Services to enter into a grant agreement with the Greater London Authority (GLA) for purchase of the Section 106 block of apartments at Fulton Road in the sum of £8.2m.

2.5 Delegate authority to the Corporate Director of Finance & Resources in consultation with the Leader Member for Finance, Resources & Reform to secure the necessary pre-requisite consents and thereafter agree the terms for entering a lease of the 118 units to a Council owned subsidiary.

3.0 Detail

3.1 The mixed development on the former Euro Car Parts site, Fulton Road will deliver retail space, industrial floorspace and 759 homes in the Wembley Park area. The planning application reference for this development is 21/2989 and it was granted planning permission in March 2022.

3.2 Regal Homes Management Limited as the developer is now seeking a buyer for 294 homes that are being sold as a package across Blocks D and E. The breakdown of the 294 homes is as follows:

London Living Rent Unit (LLR) Unit Mix – Block D	
1 Bed	53
2 Bed	29
3 Bed	36
Total	**118**

London Affordable Rent (LAR) Unit Mix – Block E	
1 Bed	35
2 Bed	85
3 Bed	56
Total	**176**

3.3 Officers have approached the developer regarding the possibility of purchasing these homes. An agreement in principle has been reached on a purchase price of £84.6m exclusive of VAT via private treaty, which means an average purchase price of under £290k for each home. It should be noted that the £85.6m budget request is made up of the £84.6m purchase price and professional fees/disbursements both exclusive of VAT.

3.4 The original S106 for this site included 218 affordable homes, which included 80 x London Affordable Rent, 62 x Intermediate Rent, 76 x Shared Ownership. The purchase of these blocks therefore represents an increase in affordable housing and an improvement on the tenure(s) that are available.

Housing Demand and Management Considerations

3.5 From a housing demand perspective, whilst there is greater demand and longer waiting times for larger family sized accommodation, the Council is always able to allocate 1-bedroom homes. Additionally, the location of Fulton Road in Wembley Park makes them more desirable. There are currently 799 households living in Temporary Accommodation that have a 1-bedroom need. This is higher than 2-bedroom demand at 692 and 3-bedroom remains the highest at 1,096. This highlights the benefit that Fulton Road as a development will bring in meeting current housing demand.

3.6 London Living Rent (LLR) is an affordable housing product as an entry level option to home ownership. Rents are set by the Greater London Authority (GLA) and are based on average incomes at a ward level. The intention for LLR is that after 10 years, the tenant would have benefited from paying a lower rent and build up savings to then purchase their home, possibly as a shared ownership product.

3.7 However, the GLA allows Local Authorities to request that LLR stays as rented accommodation in perpetuity meaning it would be classified as ‘Alternative Affordable Homes’. If the Council can secure permission for LLR in perpetuity, then the Council will be able to continue utilising these homes to deliver more accessible affordable housing. The Council’s intention is to lease Block D to a Council owned subsidiary to enable delivery of the 118 units as London Living

Rent.

GLA Grant Agreement

3.8 The Council has submitted an application to the GLA for grant funding to complete the purchase of these homes. As this purchase is largely a S106 package and the overall percentage of affordable housing across the site is 40% (based on habitable rooms), then the grant available is capped at £28k per unit. Subject to GLA approval, this means that the total grant requested for this scheme is £8.2m.

3.9 In order to access this grant, the Council is required to enter a grant agreement with the GLA and delegated authority is bought sought for to the Corporate Director, Resident Services to enable this.

4.0 Euro Car Parts, Fulton Road Site

4.1 The former Euro Car Parts site, Fulton Road is approximately 1.2 Ha and has been allocated for a mixed use residential led development within the Brent Local Plan 2018 and Wembley Area Action Plan (WAAP).

4.2 In March 2022, planning permission was obtained for a mixed development including 759 homes, commercial use space, public realm improvements and a new access road through the site.

4.3 The site is particularly well connected to the transport infrastructure having a PTAL (TfL's Public Transport accessibility Level) rating of 4. This represents a 'good' level of accessibility to public transport. The site is also near local amenities such as schools, leisure centres, a large library and shopping facilities.

4.4 The Fulton Road development will create a vibrant new neighbourhood and completion of the entire scheme is expected by 1st July 2026.

5.0 Financial Implications

5.1 The total cost of the scheme including professional fees and disbursements is forecast to be £85.6m.

5.2 The Council will acquire 252 affordable homes as part of the S106 agreement whilst also providing additional affordable provision of 42 homes. To ensure the scheme's viability, the provision of homes at London Affordable Rent (LAR) is being subsidised by the inclusion of homes at London Living Rent (LLR). Both tenure types will enable the Council to claim £28k per home in grant from the GLA to support the delivery of affordable housing.

5.3 The payment arrangement currently agreed is as follows:

- 10% will be payable upon contract exchange

- 25% will be payable on Golden Brick of Blocks D & E (with 12.5% on Golden Brick of Block D, and 12.5% on Golden Brick of Block E)

- The remainder will be paid upon monthly notices as the development progresses and in line with certified development and construction cost drawdowns.

5.4 The level of service charge for the maintenance of communal parts is subject to negotiations with the developer.

5.5 It has been assumed that the Council will receive 100% Stamp Duty Land Tax (SDLT) relief based on the assumption that:

(a) The Council is deemed to be a relevant housing provider that is controlled by its tenants; and

(b) The application of GLA grant receipts meets the requirements of a qualifying public subsidy.

5.6 The homes will be held in the Housing Revenue Account and the LLR homes will be leased to a Council owned subsidiary.

6.0 Legal Implications

6.1 Sections 9 and 17 of the Housing Act 1985 (the 1985 Act) give Council powers to provide accommodation:

- Section 9(1)(b) of the 1985 Act provides that a local housing authority may provide housing accommodation by acquiring houses; and

- Section 17(1)(b) of the 1985 Act provides that a local housing authority may acquire houses, or buildings which may be made suitable as houses, together with any land occupied with the houses or buildings.

6.2 The units will be purchased pursuant to part II of the 1985 Act. Accordingly, section 32 of the 1985 Act states that the demise of housing that has been acquired for the purpose of part II of the 1985 Act may require the Secretary of States Consent for the subletting of the 118 x LLR units to a Council owned subsidiary.

6.3 The Council's legal department will undertake all the necessary due diligence Prior to exchange of contracts. Accordingly, all the necessary searches and Title information will be examined prior to entering the contract to ensure that the Council will acquire the property with good and marketable title.

6.4 Officers propose the tendering and award of contracts for professional services relating to the construction supervision of the 294 homes that will be transferred to Brent Council. For both Low Value and Medium Value Contracts, the relevant Corporate Director has delegated authority pursuant to paragraph 9.5 of Part 3

of the Constitution to authorise the procurement of such contracts and award the contracts.

7.0 Equality Implications

7.1 Pursuant to s149 Equality Act 2010 (the "Public Sector Equality Duty"), the Council must, in the exercise of its functions, have due regard to the need to:

(a) eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act.

(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,

7.2 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.

7.3 Having due regard involves the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.

7.4 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.

7.5 The proposals in this report have been subject to screening and no adverse equality implications have been identified.

8.0 Consultation with Ward Members and Stakeholders

8.1 This paper will be circulated to all Ward Members.

9.0 Human Resources / Property Implications

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

10.0 Public Services (Social Value) Act 2012

10.1 The Council is under duty pursuant to the Public Services (Social Value) Act 2012 ("the Social Value Act") to consider how services being procured might

improve the economic, social and environmental wellbeing of its area; how, in conducting the procurement process, the Council might act with a view to securing that improvement; and whether the Council should undertake consultation. Officers will have regard to considerations contained in the Social Value Act in relation to the proposed procurements and where appropriate, include reference to social value being 10% of the evaluation score.

Report sign off:

Minesh Patel
Corporate Director of Finance & Resources

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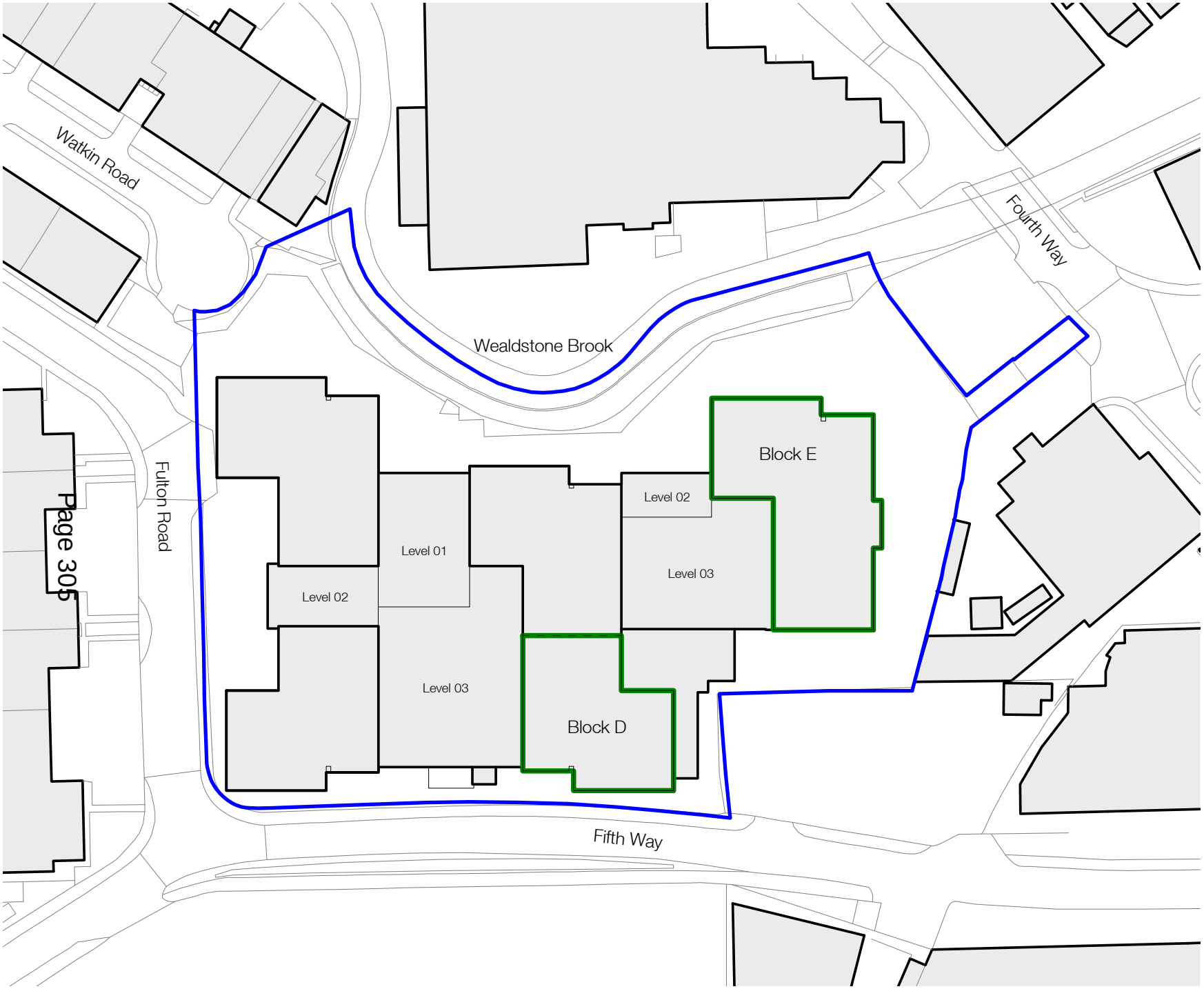

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Rev	Description	Drawn	Checked	Date
P3	Updated following client comments	ASM	AHM	01/11/22
P2	Updated following client comments	ASM	AHM	24/10/22
P1	First Issue	DPR	AHM	11/08/22

Suitability

Issued for Information

Project

Regal Wembley Limited

Fulton Road - Ground & Podium Internal Layouts

The Waterside, Fulton Road, Wembley

Drawing Title

Block D and E Building Plan

Drawing Number

Project ID	Origin.	Zone	Level	Type	Role	Number
FTRD	RYD	YY	00	D	A	99-0002

Project Number	Scale at A4	Status	Revision
10748:00	1 : 1000	S2	P3

info@ryderarchitecture.com
www.ryderarchitecture.com
Ryder

1 99-0002 - Block D and E Building Plan

1 : 1000

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Brent	**Cabinet** 6th February 2023
	Report from the Corporate Director of Finance and Resources

Airco Close Lease Assignment

Wards Affected:	Kingsbury
Key or Non-Key Decision:	Non-Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Partly Exempt – Appendix 2 is exempt as it contains the following category of exempt information as specified in Paragraph 3, Schedule 12A of the Local Government Act 1972, namely: "Information relating to the financial or business affairs of any particular person (including the authority holding that information)"
No. of Appendices:	Two Appendix 1: Site Plan Appendix 2: Lease Transfer Document (exempt)
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Neil Martin Head of Capital Programmes (Schools) 020 8937 4203 neil.martin@brent.gov.uk Denish Patel Head of Property 020 8937 2529 denish.patel@brent.gov.uk

1.0 Purpose of the Report

1.1 This report sets out the recommendation to approve a transfer of a 999-year lease from the Developer of 399 Edgware Road to the Council for a concrete podium above a basement car park as part of a s106 agreement for the development.

2.0 Recommendation(s)

That Cabinet:

2.1 Agree a transfer of a 999-year lease from the Developer of 399 Edgware Road to the Council for a concrete podium above a basement car park as part of a s106 agreement for the development.

3.0 Detail

3.1 In May 2013, the Council granted planning consent for a mixed-use development at the former Oriental City, 399 Edgware Road, Kingsbury, NW9 0JJ. Consent was granted for 7817m^2 of retail A1 space and 5207m^2 of other shops and offices and 183 residential units along with a two-form entry primary and nursery school (Class D1).

3.2 In June 2013, the Council entered in a Section 106 Agreement (s106) which secured the transfer of land to the Council for two-form of entry (2FE) primary school with nursery provision.

3.3 The location of the school and nursery is a concrete podium (~2,700m^2) to the north-west corner of the development site, alongside the boundary with Airco Close. The site is inclusive of 39 parking spaces in the basement car park along with access to the site from Airco Close and from within the Morrison's service yard. Appendix 1 shows the site plan.

3.4 Following on from the planning approval, the initial proposal for the site was to develop the school site for a two-form entry school. Initial plans were to provide a Free School with the Department for Education (DfE) managing the design and build process. The School Podium was completed in 2015 and in accordance with a Technical Specification that has been submitted and approved by the Council

3.5 In May 2016, Cabinet approved the leases for Floreat Education Academies Trust (FEAT) in May 2016 to operate the proposed new school at Airco Close and an interim lease at 434 Church Lane, Kingsbury, NW9 9BD until the new school was ready.

3.6 However, since then, pupil numbers have decreased and it was confirmed there was no need for a school in this part of the borough, FEAT withdrew from operating a school in the borough and the DfE confirmed they would not be providing a new school building at Airco Close. The project to deliver a primary school on this site was aborted.

3.7 The site has remained vacant since completion in 2015 except for being used as a building compound for the residential developments which completed in 2018. The developer has undertaken protective measures as well as recent repairs to the area to ensure it is transferred to the Council in a reasonable and appropriate state.

3.8 There is currently no requirement to provide a Primary School in this part of the borough. Within the terms of the lease, the Council has the right to seek the landlord's consent for other uses and such consent should not be unreasonably withheld.

3.9 Options for the site will be brought forward for consideration in future Cabinet reports.

4.0 Financial Implications

4.1 The Council will be acquiring a site capable of development as a school or otherwise in a significant growth area. Such sites are difficult to secure on the market at reasonable cost. The acquisition is at nil payment and is part of a significant s106 agreement that has allocated the land as school development site.

4.2 There could be cost implications to maintain and secure the site until such time a contractor is appointed to deliver work and a building operator is in place to operate and manage the building(s). Subject to project approval, this is likely to be in 2025/26.

4.3 The estimated costs to cover any security and maintenance of the site and the site's contribution to the landlord's service charge share until the site is utilised are £20k per annum and will be covered within the existing projects budget.

4.4 Capital financial implications for site development will be included in future Cabinet reports.

5.0 Legal Implications

5.1 The Council entered a s106 agreement on 26 June 2013 which sets out the terms under which the developer is required to grant a long lease at a peppercorn rent of the school podium and hence the Council is contractually committed to taking a transfer of the lease of the school land.

5.2 As the lease is for 999 years, Cabinet is required to approve the Council taking a transfer of the lease of the school land. According to paragraph 11.2 Part 3 of the Brent constitution, the Corporate Director, Finance and Resources may not acquire leases where the term exceeds 125 years. According to paragraph 11.11 Part 3 of the Brent constitution, in any cases where officers do not have or may not exercise delegated powers in respect of land and buildings the matter shall be determined by the cabinet.

5.3 The main terms of the lease of the school land that is being transferred to the council are as follows:

5.3.1 The lease is dated 18 May 2015 relating to school land at 399 Edgware Road, Colindale, London NW9 between (1) Nereus Limited (in

liquidation) (2) Phillip Rodney Sykes (3) Development Securities (Edgware Road No.1) Limited.

5.3.2 The term of the lease is 999 years from 18 May 2015.

5.3.3 The annual rent is a peppercorn.

5.3.4 The tenant is responsible for paying the rates and the outgoings.

5.3.5 The tenant has to keep the demised premises in a good and substantial state of repair, decoration and condition.

5.3.6 The tenant must not make any structural alteration in the construction or arrangement of the demised premises which might adversely impact on the other buildings within the Estate.

5.3.7 The tenant must comply with the terms of the s106 Agreement dated 26 June 2013 and made between (1) The Mayor and Burgesses of the London Borough of Brent (2) Nereus Limited (in liquidation) (3) Phillip Rodney Sykes and David Alan Rolph (as receivers) (4) Development Securities (Projects) Limited (5) Development Securities Plc so far as it relates to the demised premises.

5.3.8 The tenant must not make any application under the Planning Acts in relation to the demised premises without the prior written consent of the landlord (which will not be unreasonably withheld or delayed where the landlord's consent or approval is also obtained under the lease for a permitted alteration, a sign or a change in use).

5.3.9 User – not to use the demised premises other than for use as an educational facility within Class D1 of the 1987 Use Classes Order or such other use as the landlord shall approve such approval not to be unreasonably withheld or delayed and provided that no approval is required for a change of use to residential use.

5.3.10 The landlord will procure the repairing, maintaining, lighting, cleaning and reinstating of the Access Roads Service Area and Car Park.

5.3.11 The title to the lease is registered under title number AGL361458 with title absolute.

6.0 Equality Implications

6.1 The Council, as a public authority exercising public functions, is subject to a public sector equality duty (PSED) under section 149 Equality Act 2010 (EqA). The PSED requires public authorities to have "due regard" to:

- The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the EqA.

- The need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic.
- take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and
- encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This includes having due regard to the need to tackle prejudice and to promote understanding.

6.2 There are no equality implications for the assignment of the lease. Specific equality implications will be considered in future development proposal reports.

7.0 Consultation with Ward Members and Stakeholders

7.1 Consultation with Ward Members will take place as part of any future development proposals for the site.

7.2 Relevant stakeholders will be engaged at the appropriate stages of any future development proposals for the site.

8.0 Human Resources/Property Implications (if appropriate)

8.1 There are no human resource implications for this decision.

8.2 There is a risk that if no development proposal comes forward in the medium to long-term, the site will be at risk of deterioration and security breaches which would fall onto the Council to resolve and would have an impact on revenue finances.

Report sign off:

Minesh Patel
Corporate Director of Finance and Resources

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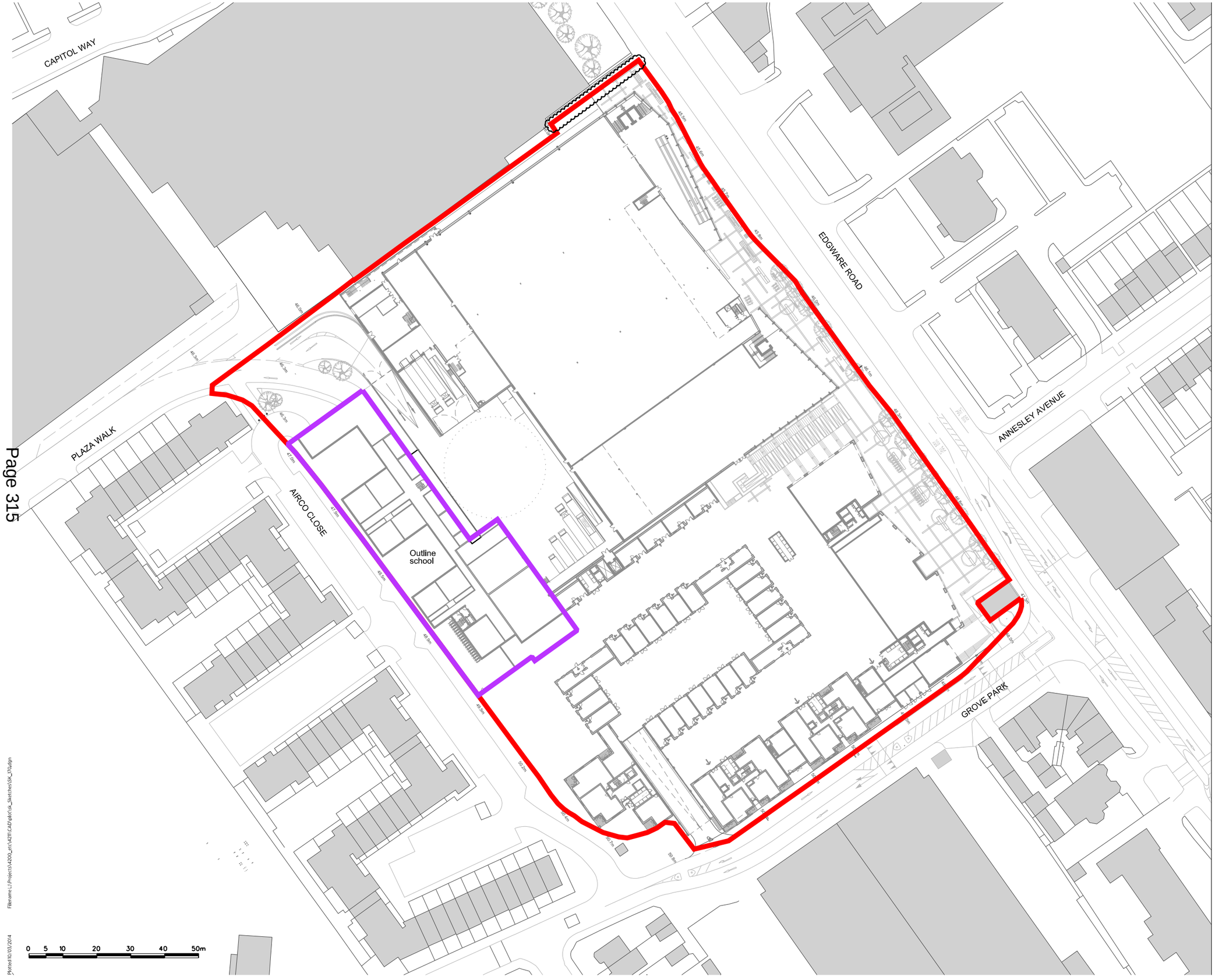
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PLAZA WALK
AIRCO CLOSE
EDGWARE ROAD
ANNESLEY AVENUE
GROVE PARK
Outline school
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Brent	**Cabinet** 6th February 2023
	Report from Director of Communities

Brent Borough Plan 2023 - 2027

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	Four Appendix A: Borough Plan Engagement and Consultation Findings 2023-27 Appendix 2: Brent Borough Plan 2023 – 27 Appendix 3: Borough Plan evidence base Appendix 4: Equality Impact Assessment
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Lorna Hughes Director of Communities 020 8937 5068 Lorna.hughes@brent.gov.uk Tom Pickup Policy, Partnerships and Scrutiny Manager 07553724213 Tom.pickup@brent.gov.uk

1. Purpose of the Report

1.1. To share the findings from the draft Borough Plan consultation and engagement and, reflecting on the findings, the proposed changes and updates for the final Borough Plan.

1.2. Additionally, to seek endorsement for the following suite of documents that will be submitted to Full Council:

- Borough Plan Engagement and Consultation Findings 2023-27 (Appendix A)
- Brent Borough Plan 2023 - 27 (Appendix B)
- Borough Plan evidence base (Appendix C)
- Equality Impact Assessment (Appendix D)

2. Recommendations

2.1. To endorse the following to be progressed to Full Council for finalisation and adoption:

- Borough Plan Engagement and Consultation Findings 2023-27 (Appendix A)
- Brent Borough Plan 2023 – 27 (Appendix B)
- Borough Plan evidence base (Appendix C)
- Equality Impact Assessment (Appendix D)

3. Brent Borough Plan 2023 – 27

3.1 This report shares the final Brent Borough Plan 2023-27 and outlines the process we have undertaken to frame, shape and consolidate our ambitions. The Borough Plan consists of the following core components:

- Our Strategic Priorities – these are the five key overarching themes that will drive all we do as an organisation.
- The Desired Outcomes – these sit underneath each Strategic Priorities and outline the specific issues and areas we want to make an impact. Each desired outcome includes greater detail and commitments within the 'we will' sections which outline what we will seek to deliver.
- What Success Will Look – this consists of broad and indicative success measures. These will be expanded further into key performance indicators following the finalisation of the Borough Plan.

3.2 Although the Borough Plan shares our ambitions for the next four years, we also understand the importance of flexibility. The pandemic demonstrated that we must be able to adapt to needs and challenges as they arise. Currently we are operating within the cost of living crisis and the difficult financial context it has created, as outlined within our Budget Strategy 2023/24, therefore we will ensure we are ready to respond to any key changes in circumstance and tailor our priorities accordingly.

4. Consultation and engagement findings

<u>Engagement undertaken</u>

4.1 Between 31 October 2022 – 10 January 2023, the council has been consulting and engaging with residents, partners, stakeholders and specific communities. Our consultation approach focused on sharing and receiving feedback from people around our draft ambitions – essentially, our provisional areas focus were used to capture peoples voice and understand what matters to them. The aim of this consultation phase was to:

- Share and amplify the new, proposed strategic ambitions
- Provide information on the council's current pressures
- Understand and align our ambitions with stakeholder, partner and resident priorities

Event	Attendees/number	Additional Notes
Workshops and focus groups	73	• Workshops open to residents and specific communities: 30 November and 8 December • Pensioners focus group: 7 December • Partner and stakeholder event: 9 January
Library drop-in sessions	Estimated 105	• Kilburn Library Drop-in Session - 8 November • Wembley Hub Drop-in Session - 23 November • Willesden Library Drop-in Session - 8 December
Partners events	Estimated over 350	Includes but not limited to: • Housing Department Licensing events • Healthwatch event • Pride of Brent Youth Awards • Gladstone Park Primary School • Brent Multi-faith forum • Local Democracy week event • Brent Connects x5 • VCSE Question Time • Disability Forum • Borough of Sanctuary group • Brent Youth Parliament • Brent Health and Wellbeing Board • Forward Together and other internal staff sessions
Survey responses	417	402 online survey responses 15 physical survey responses

4.2 We aimed to engage and involve as many people as possible. To ensure this, we have undertaken a thorough series of engagement activities across the following key groups: specific communities, stakeholders and partners, general public and internal staff. As outlined in the table below, the engagement has consisted of the following:

- Drop-in sessions and community events
- A range of meetings and focus groups in each Brent Connect area
- Information sessions at libraries and hubs
- Online information sessions
- Online survey/ feedback form
- Multimedia campaign
- CitizenLab
- Focus groups with underrepresented groups

- Meetings with partnership and stakeholder groups

4.3 It is estimated that we have reached out to thousands of residents, communities and organisations and received around 900 direct responses, through the online survey and the range of activities as outlined below.

Consultation and engagement findings

4.4 The Borough Plan Engagement and Consultation Findings Report (Appendix A) details the breadth of feedback, ideas and concerns raised across the engagement. The key overarching themes are as follows:

- Environment – making Brent cleaner (i.e. tackling flying tipping) and greener (i.e. more and improved parks and open spaces).
- Crime and safety – concerns about safety for young people and women, anti-social behaviour and substance misuse.
- Young People – supporting their skills development and routes to full-time employment.
- Roads and transport – reducing congestion; improving access to, and facilitating more active travel.
- Housing – improving quality and affordability of housing, particularly during the cost of living crisis. Continuing to tackle homelessness, namely rough sleeping.
- Community cohesion and inclusion – harness our diversity and being more proactive to support greater community cohesion.
- Health – improving access to health care and mental health support; addressing health inequalities.
- Local democracy – amplifying the value of, and our work with the VCS; continue to create more opportunities for community participation and for people to influence decisions.
- Businesses and skills – supporting local skills development to get people into higher paid jobs.

4.5 In order to categorise the feedback, both through the quantitative and qualitative exercises, the findings report is broken down into three sections:

- **Feeling and responses to the draft priorities.** This section outlines the feedback to the survey questions which aimed to understand respondents feeling and reaction to the draft strategic priorities and core elements within them.
    - Within the residents' responses to draft priorities, 'A Cleaner, Greener Future' was identified as the most important to residents, whilst 'Prosperity, Pride and Belonging in Brent' and 'Respect and Renewal' were viewed less favourably.

- **What did people have to say about Brent?** This section captures the broad range of feedback and views we received from qualitative engagement, such as workshops, focus groups, meetings and drop-in sessions.

- The most frequently occurring themes when analysing the open-ended survey questions were as follows (these themes are similar to the general themes from broader qualitative engagement):
  - Environment
  - Young people
  - Health
  - Roads and transport
  - Local democracy
  - Housing

- **What should Brent look like in 2027?** The section describes the responses received to this question, both to the survey and during qualitative engagement.
  - Many responses wanted the Borough to look safer and cleaner over the next four years, which is represented in the word cloud of resident responses.

5. Updating the Borough Plan 2023 – 27

5.1. The Borough Plan captures our achievements over the last four years and provides the context, narrative and strategic priorities for our new ambitions. It is the overarching strategy that states our commitments and desired outcomes moving forward.

5.2. In October, Cabinet received the draft Borough Plan which utilised a series of initial engagement to understand the possible key areas of focus for the borough and organisation. However, to ensure our ambitions are right and reflective of what matter to our residents, communities and partners, we wanted to utilise the findings of a comprehensive consultation to shape the strategy. As such, our final Borough Plan 2023-27 is a product that is based on feedback – see Appendix B.

5.3. The following areas outline the key changes that have been made to the Borough Plan, following feedback from the consultation:

<u>General comment:</u>

- Include more reference to the importance of partnerships working, including the value of our voluntary and community sector.

<u>Prosperity, Pride and Belonging in Brent (now Prosperity and Stability in Brent)</u>

- Updating Strategic Priority (SP) 1 to “Prosperity and Stability” – this is to reflect feedback that people didn’t align the desired outcomes within this priority with the feeling of ‘pride or belonging’.
- Move ‘Safe, Secure and Decent Housing’ from SP 3 to SP 1 and expanding this to include ambitions around housing quality across Brent. Moving this priority also reflects people’s uncertainty around the meaning of the previous SP 3 (Respect & Renewal).

<u>A Cleaner, Greener Future</u>

- Move the desired outcomes “Empowering our Communities” (now “Enabling our Communities”) and “A Safer Borough” to the new SP 3, which is more clearly aligned with these themes.
- Include desired outcomes “A Sustainable Borough and a Greener Economy” (now “Climate-friendly, Sustainable Borough”) and “Keeping Brent on the Move”, both previously in SP 3.
- Amplify our climate change activity and commitment – this reflects many comments around presenting this more clearly and comprehensively in the Borough Plan.

Respect and Renewal in Brent (now Thriving Communities)

- Updating SP 3 to “Thriving Communities”. This will reflect people’s uncertainty with the previous title ‘Respect and Renewal’ and desired outcomes within this. This also reflects comments to amplify our support and recognition for our diverse communities and voluntary and community sector.
- Add new desired outcomes: “Enabling our Communities” and “A Safer Borough”, as above.
- New commitment (‘we will’) included around community safety. This reflects peoples focus on safety during the consultation - specifically around feeling safe, anti-social behaviour and substance misuse.
- Include greater reference and possible commitments around community cohesion – this reflects the value people have placed on inclusion, community cohesion and integration.

The Best Start in Life

- Only minor updates and no substantial changes. The issues identified in the consultation are already being addressed within this and other strategic priorities.

A Healthier Brent

- More reference to Adult Social Care provision to reflect the level of need and council resource invested into supporting resident who require care support.
- Ambition included around addressing substance misuse through a public health approach – this reflects feedback and concerns around anti-social behaviour and drug and alcohol misuse.

6. Borough Plan Evidence Base

6.1. The supporting evidence base for the Borough Plan (Appendix C) captures the key information, data and trends (from publicly accessible sources) that clearly describes Brent – its make-up, needs, uniqueness and challenges. The evidence base also consists of data and key quotes from the engagement and consultation to paint the Brent picture, aligned with the new priorities (‘Quotes’ and ‘Context Setting’). This product also seeks to show the progress and activity (‘What We’ve Done’) by the council to address key challenges for the borough.

6.2. Whilst the evidence has been used to drive the development of, and contextualise the Borough Plan, it can also be used as tool that can inform the development of other Council strategies, projects and initiatives, and can be used by partners and residents.

7. Next steps

7.1. Once agreed, the following next steps will be undertaken:

- Socialising the Borough Plan – we will initiate both internal and external engagement to begin sharing our new ambitions. This will include:
    - External:
        - Partnership event(s) to share the ambitions and to have a dialogue about working better together within a challenging financial context.
        - Communications to our communities and across our partnership landscape to share the new ambitions.
    - Internal:
        - All staff sessions.
        - Roadshows to departmental management teams.
        - Communications with across the organisation to share the new ambitions
- Officers will work with departments to agree measures and milestones to be included in the new corporate performance matrix. This will be developed for spring 2023.

8. Legal implications

8.1. The Borough Plan is one of the Policy Framework documents which is required by the Constitution to be considered by Cabinet and recommended by Cabinet for adoption by the full Council. Legal advice will be required in respect of the implementation of a number of the actions in the Borough Plan and the Equality Action plan.

9. Financial implications

9.1. The draft Borough Plan highlights the existing financial context, i.e., the cost of living and post-pandemic recovery.

9.2. The Borough Plan will go to the same Full Council meeting as the budget report. The budget report will set out the overall financial position facing the Council for the next four years and highlight significant risks, issues, and uncertainties. It will also set out the budget proposals for 2023/24 to 2024/25 to deliver a balanced budget.

10. Equality implications

10.1. Under Section 149 of the Equality Act 2010, the Council has a duty when exercising their functions to have 'due regard' to the need:

- To eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act;
- Advance equality of opportunity; and
- Foster good relations between those who share a "protected characteristic" and those who do not.

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

10.3. The purpose of the duty is to enquire into whether a proposed decision disproportionately affects people with a protected characteristic. In other words, the indirect discriminatory effects of a proposed decision. Due regard is the regard that is appropriate in all the circumstances.

10.4. The proposals in this report have been subject to a full Equality Impact Assessment and Officers believe that there are no adverse equality implications and assist in advancing equality of opportunity and fostering good relationships.

10.5. Equality analyses has been conducted concerning the ambitions and it has been considered that there will be positive equality implications for many of the activities undertaken under the Borough Plan in the next four years.

10.6. Responses from the public consultation on the plan have shaped the ambitions, priorities and content of the Borough Plan.

10.7. Further analysis will be conducted or reviewed as necessary as Plan is implemented

Report sign off:

Lorna Hughes
Director of Communities

Brent Borough Plan 2023-2027

2023 engagement findings

Brent

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What did people have to say about Brent?	p10
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Annex A - Engagement Summary	p17
Annex B – Demographic breakdown of survey responses	p19

Executive Summary

From 31 October to 10 January 2022, Brent Council carried out a comprehensive engagement exercise to understand the views and opinions of residents and partners for the Brent Borough Plan 2023-2027. We engaged with people through a survey, focus groups, workshops and drop-in sessions and captured the voice of at least 900 people who live and work in Brent. This included engagement and responses from a range of different communities within the borough.

To understand people's perspectives, we asked them to feedback on our five draft priorities. However, our engagement wasn't solely about obtaining feedback, we also sought to understand their own priorities for the borough, the concerns and challenges they face and the opportunities for Brent by 2027. This is also within a context where Brent, just like other areas across the country, finds itself in a challenging financial environment where the council and partners must do things differently to continue supporting our communities.

Broadly, people found that the key issues for the borough were reflected within the draft priorities. However, local people identified some themes that we need to amplify and extend in order to be more transparent and aspirational.

The environment was a key priority as people wanted to see cleaner streets and a greener borough, characterised by better air quality, less traffic, more green spaces and more accessible route for active travel (e.g. cycling).

Safety, particularly feeling safe, was really important to people. People often spoke about creating safer environments for young people and women, both in general but also in relation to public environments and transport. To help people feel safe we also need to address crime and prevent criminally, as many referenced concerns about anti-social behaviour and drug and alcohol abuse.

People value our younger generations and recognise we need to do more to support them and harness their talent. Residents mainly spoke about the need to better develop young people's skills to help them access more opportunities and get them into full-time work.

For Brent, our diversity is vital – it is what makes the borough unique, vibrant and thriving. Residents and partners want to us to be more proactive in harnessing our diversity and supporting cohesion across the borough. Linked with this is the value people placed on community empowerment, specifically being able to influence the issues and decisions

that matter to them and supporting our voluntary, community and faith sector organisations.

Housing was a key issue that was raised in the context of the cost of living crisis. People wanted better quality and more affordable housing, including support to tackle rogue landlords. Additionally, there were concerns about rough sleeping and the need to help into temporary accommodation.

As everyone experiences the impact of the cost of living crisis some people spoke about the need for more and better paid jobs. This also means supporting local people to develop new and existing skills to help them access better opportunities.

People are concerned about being access to health care, particularly in relation to being able to see professionals without need a long wait. They also acknowledge the importance of improving access to, and awareness of mental health support. For many people, being healthy is essential to also being happy.

The themes raised from the engagement are nuanced but essential to help shape our ambitions for the next four years. It is encouraging that the issues and areas that matter to residents and partners align with the councils, however we need to match their levels of prioritisation and ambition. Once we finalise and begin delivering the Borough Plan we must also commit to the final emerging theme – partnership working. Organisations across the borough are experiencing similar challenges due to the cost of living crisis, therefore it is more important than ever to establish our collective ambitions for Brent and work together to achieve them.

Introduction

This report shares the key findings from the consultation and engagement exercise undertaken by the Council to help shape the Brent Borough Plan 2023-27. The draft Brent Borough Plan 2023-27 captures the Council's achievements over the last four years and provides the context, narrative and strategic priorities for our new ambitions. Essentially, the Borough Plan states our provisional commitments and desired outcomes for the next four years and outlines how we will work with others to achieve them.

The new Borough Plan has been drafted in the context of the post-pandemic period and the ongoing Cost of Living Crisis which has adversely impacted residents, communities, businesses and the Council. Understanding and reflecting this context is vital, as it is more important than ever to incorporate the views of everyone who lives and works in Brent as we overcome existing challenges but also identify and utilise new opportunities for the borough.

We delivered a communications and engagement plan, which from 31 October 2022 – 10 January 2023, that was centred around capturing voice, started to socialising the challenges and opportunities for the Council and initiated conversations with partners and stakeholders about the importance of working closer together. Specifically, the purpose of communications and engagement was to:

- Share and amplify the new, proposed strategic ambitions
- Provide information on the Council's budget situation and current pressures
- Receive feedback on our ambitions and the Council's budget pressures
- Understand and align our ambitions with stakeholder, partner and resident priorities

Throughout this process we engaged with a range of groups and estimated to have received around 900 responses. A breakdown of outreach and responses is available in Annex A. This broad spectrum of respondents ensured that as many voices as possible were captured, including from marginalised and minority groups, and this was achieved through a range of different methods and platforms. The responses have been used to identify the needs, concerns and ambitions of residents, and will be used to inform the Borough Plan and future Council activity and service delivery.

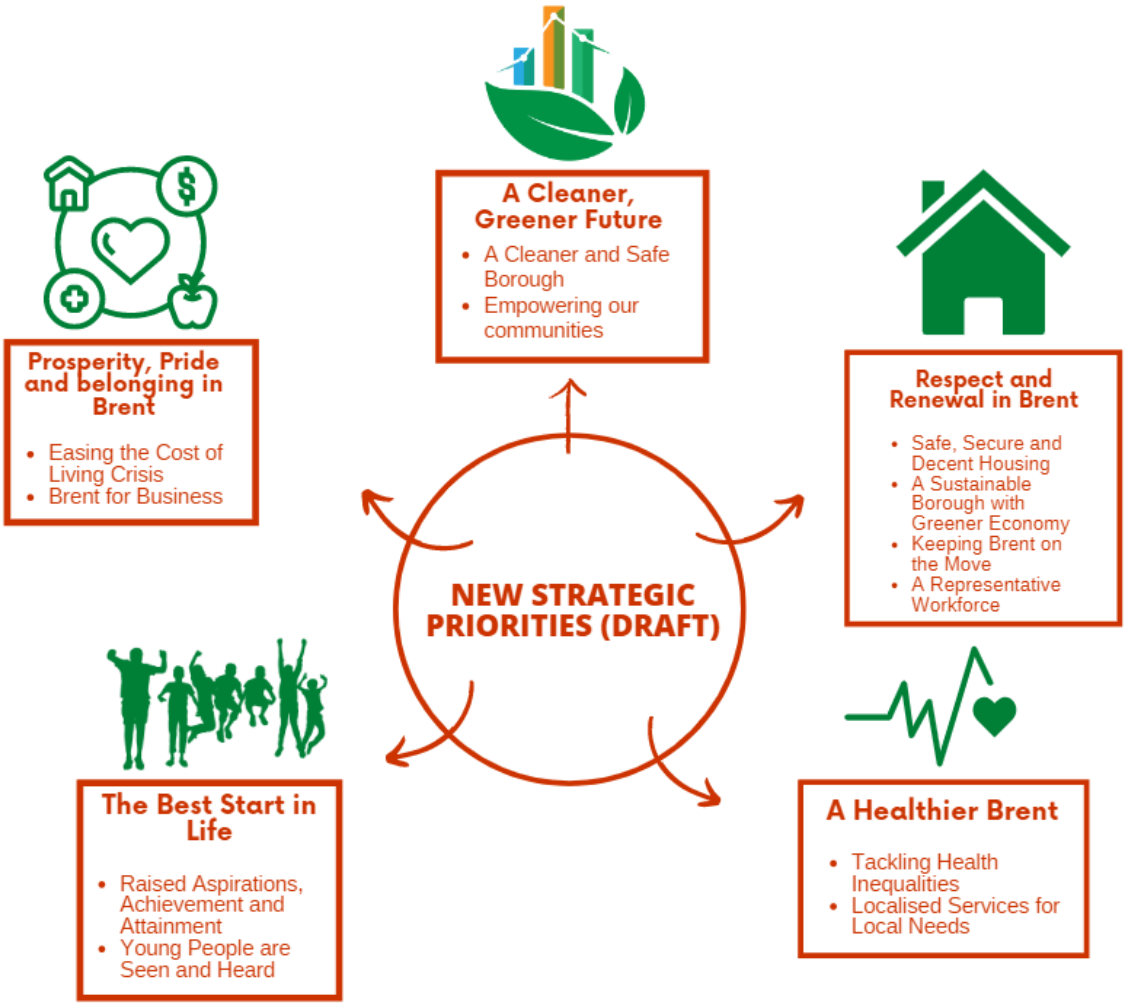
The key findings and feedback of residents and partners are captured through this document and will be used to change and update the draft Borough Plan. Where possible, a demographic breakdown for survey responses is provided, however it has been difficult to establish a comprehensive breakdown due to the small number of people that completed the equalities monitoring questions (e.g. around age, ethnicity, gender, postcode etc.). The report is categorised by the following sections:

1. **Feeling and responses to the draft priorities.** This section will outline the feedback to the survey questions, which aimed to understand respondents feeling and reaction to the draft strategic priorities and core elements within them.

2. **What did people have to say about Brent?** The section describes the responses received to this question, both to the survey and during qualitative engagement - such as workshops, focus groups, meetings and drop-in sessions.

3. **What should Brent look like in 2027?** The section will focus on outlining the responses received to this question within the survey but will also be supplemented by people's future focused views and reactions during the qualitative engagement.

Feeling and responses to the draft priorities



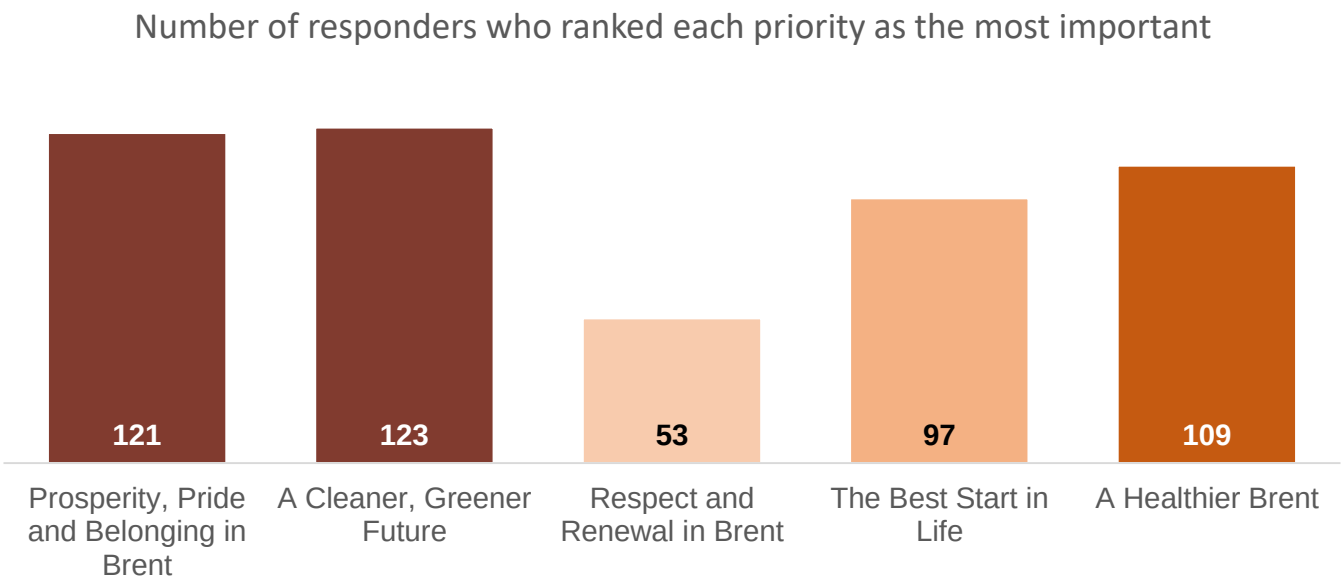
We asked residents to rank their preference for the five strategic priorities and the desired outcomes within each specific priority. Most of these questions also provided an open text box for additional thoughts and reflections.

Overall, from the surveys, it was clear that Priority 2 (A Cleaner, Greener Future) resonated most with residents. Priority 1 (Prosperity, Pride and Belonging in Brent) and Priority 3 (Respect and Renewal in Brent) were less popular with residents. This was a similar theme to drop-in sessions and focus groups (see sections below), where participants said that they felt the wording around these priorities was too vague and did not accurately capture the content or desired outcomes within them.

Analysing the survey

When analysing the tables below, the larger graph details how survey respondents felt about each borough plan strategic priority. Residents were asked to rank priorities from 1 to 5, with 1 being the one they were most strongly in support of and 5 being the one they were least supportive of. The first graph illustrates how many residents ranked "1" each priority.

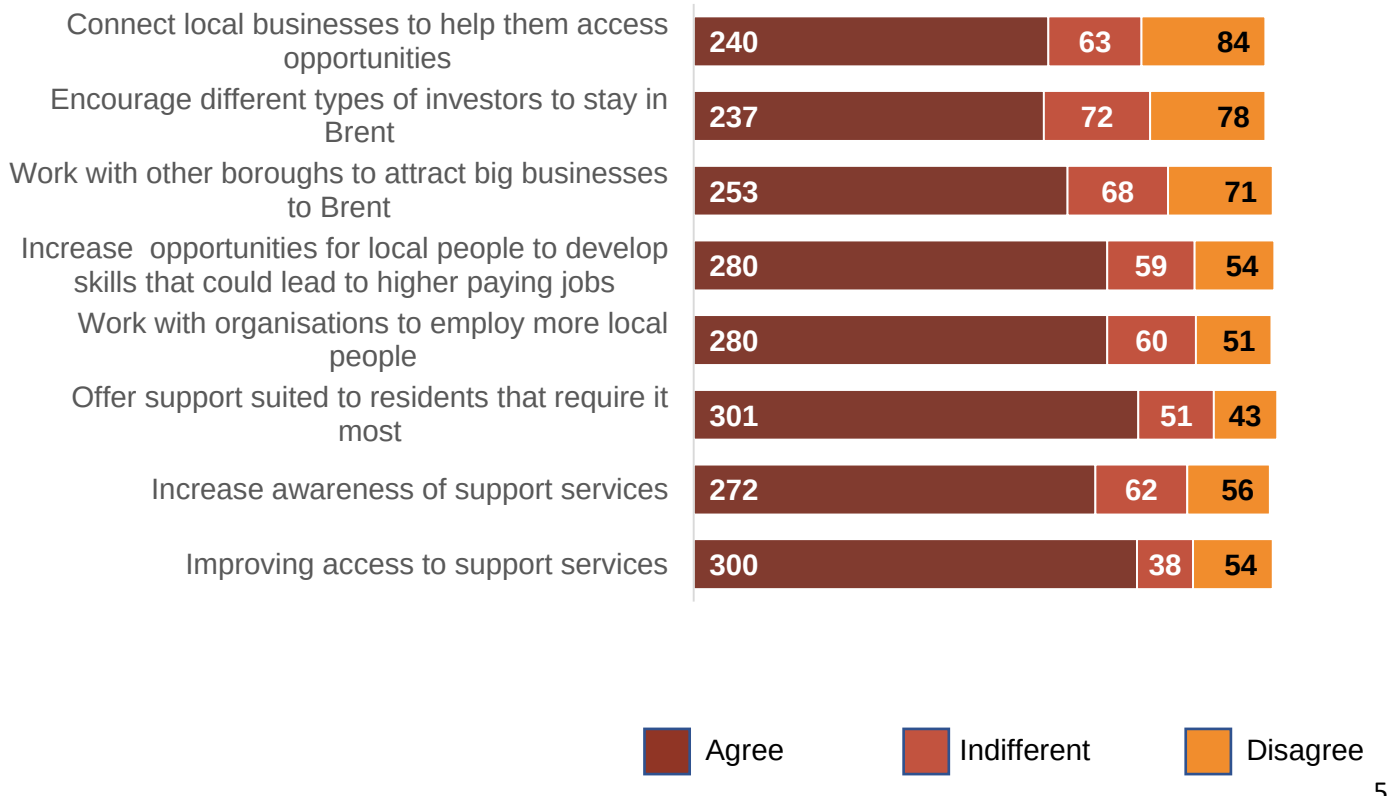
The horizontal bar graphs show how residents responded to the themes under each priority. The answers "Strongly agree" and "Tend to agree" were combined to "Agree". We merged "Tend to disagree" and "Strongly disagree" answers to be displayed as "Disagree".



Strategic Priority 1 - Prosperity, Pride and Belonging in Brent

Responses for **Priority 1**, Prosperity, Pride and Belonging in Brent, were varied. For desired outcome 1 (Easing the Cost of Living Crisis), there was a positive reaction to the promotion and availability of vocational training and developing skills for higher paid employment. Numerous respondents suggested that there should be more access to training to ensure residents have the opportunity and confidence to apply for jobs they would not normally be able to go for. Even though the cost of living crisis ranked quite high during the development of the plan, respondents did not offer much insight or feedback on what was included in the Borough Plan to combat this.

For desired outcome 2 (Brent for Business), there were several comments made regarding the lack consultation that takes place with local business when it comes to high street development, traffic calming measures and parking in shopping areas. There was a general feeling that engagement with local and high street businesses should be at the forefront of any changes impacting the retail sector in these areas.



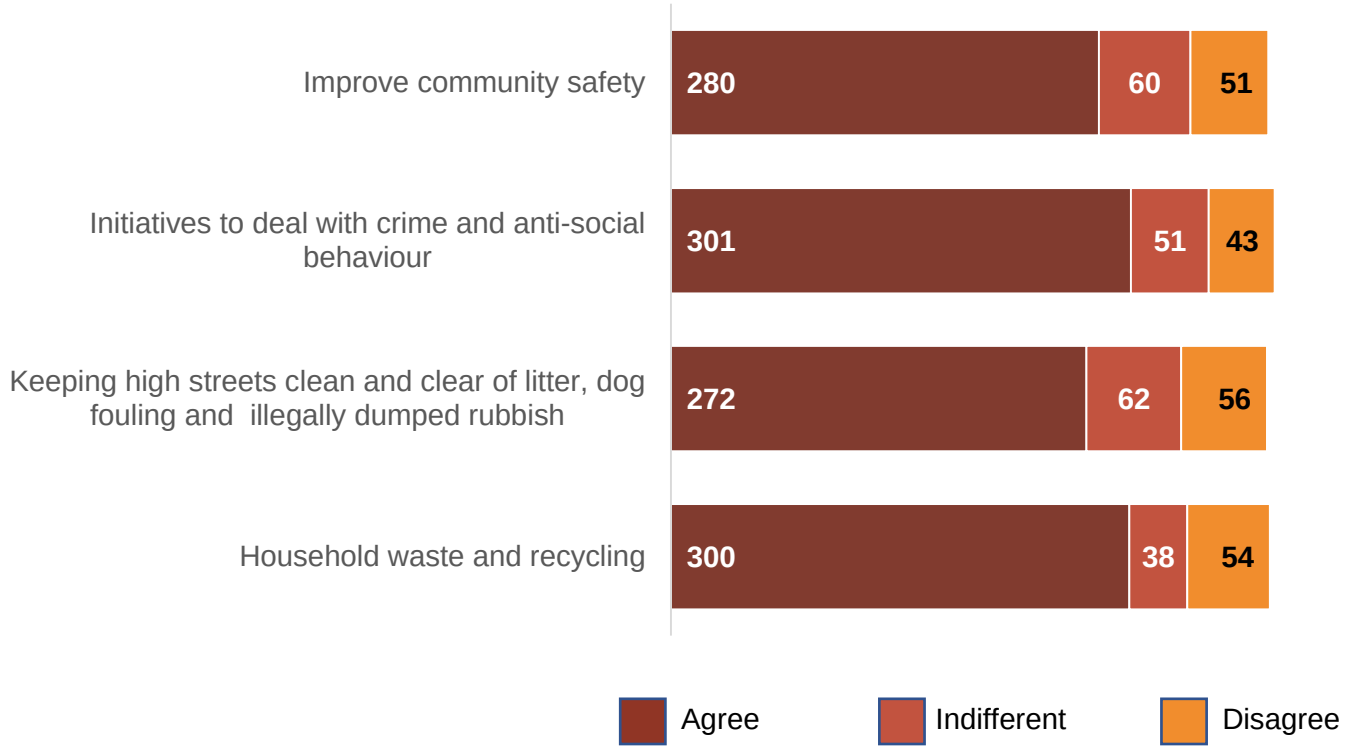
Strategic Priority 2 – A Cleaner, Greener Future

Priority 2, A Cleaner, Greener Future, was seen as the most important Strategic Priority by survey respondents. This priority covered issues including recycling and household waste, as well as residents attributing importance to initiatives to deal with crime and anti-social behaviour. However, in drop-in sessions and focus groups many residents expressed that it was unclear why issues around crime and anti-social behaviour were placed within this priority.

Responses for desired outcome 1 (A Cleaner and Safe Borough) were positive. Many respondents suggested that street cleansing; including paan spitting, dog fouling, illegal dumping of waste, and waste collections remained high on their list of priorities. Several requests were made for more effective monitoring of these issues in town centre locations. In additional to this, there was numerous mentions for additional tree planting and effective grounds maintenance of parks and open spaces.

Additionally, this outcome includes a commitment to improve community safety and reduce violence. Residents did raise concerns about not always feeling safe on the streets, walking home at night and Anti-Social behaviour such as drinking and drug use on streets and parks. Various comments were made suggesting that the Council needs to do more to tackle these issues with more enforcement, education and making community centres and other such locations available for younger residents to ensure they do not spend their spare time on the streets.

Desired outcome 2 for this priority is focused on community empowerment. Response to this outcome was limited. However, those who did comment expressed a desire for more involvement of businesses when consulting on regeneration and town centre developments. There were also suggestions made that Brent could do even more to work with charities and the voluntary sector to help develop and deliver services whilst ensuring locals felt involved. Another key finding was that many respondents felt that Council meetings are deliberately made inaccessible for all residents by insisting on them taking place at the Civic Centre in Wembley. Several respondents commented that they felt decision making meetings should not always take place in Wembley.



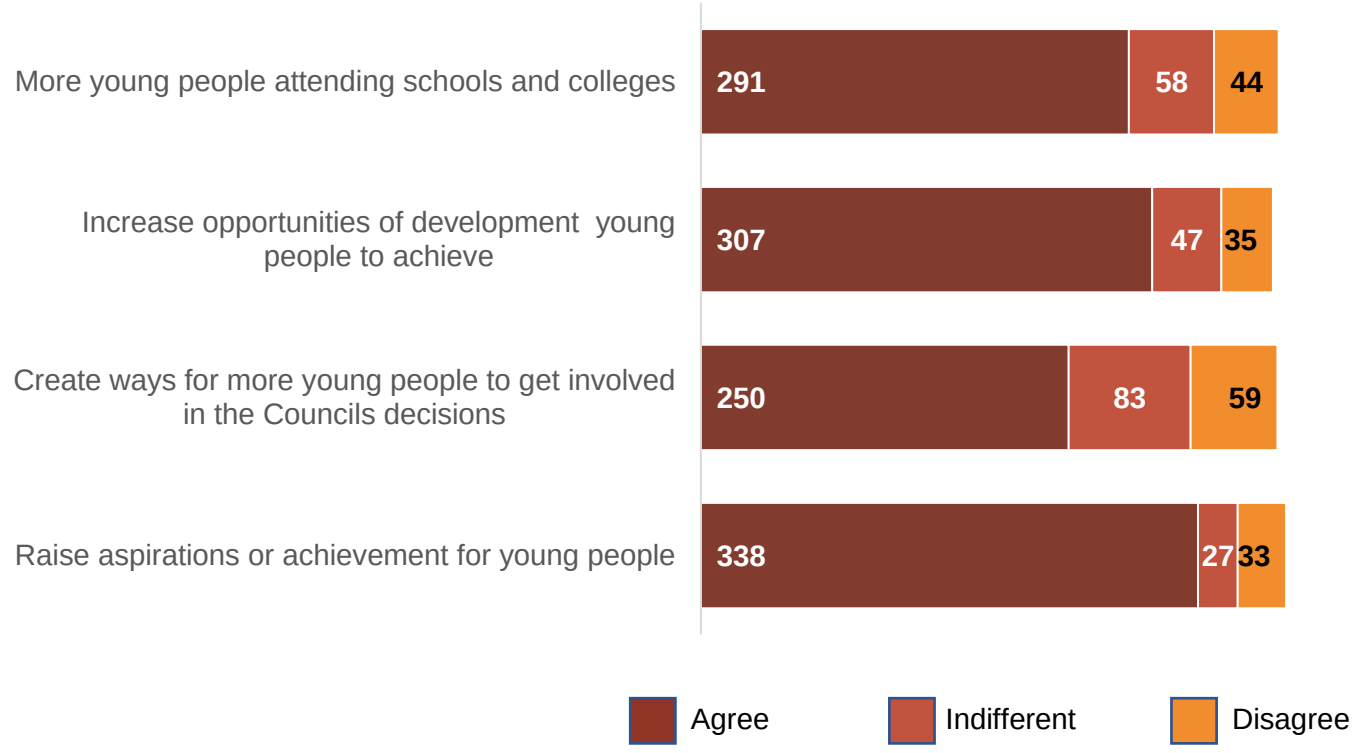
Strategic Priority 3 – Respect and Renewal in Brent

Priority 3 received a mixed reaction. Whilst some desired outcomes such as around housing and roads were positively received, other themes within this priority did not receive much feedback. This was also in line with feedback from drop-in sessions where there is a consensus that the priorities need to be worded differently.

Desired outcomes 1 and 3 (Safe, Secure and Decent Housing; Keeping Brent On the Move) were accepted without contest. The Council was encouraged to do more to ensure the quality of roads and pavements are improved with road defects such as potholes and broken paving at the top of respondents' lists. These two areas scored highly among survey respondents, despite the theme as a whole receiving lower scores overall.

Several comments were made in relation to how Brent currently tackles rough sleeping and homelessness with a mention that the Council should be doing more to look after these residents and offer temporary accommodation throughout the winter months as a minimum. There were also several comments made on Brent Council's inability to tackle rogue landlords and the Private Renting Sector in general.

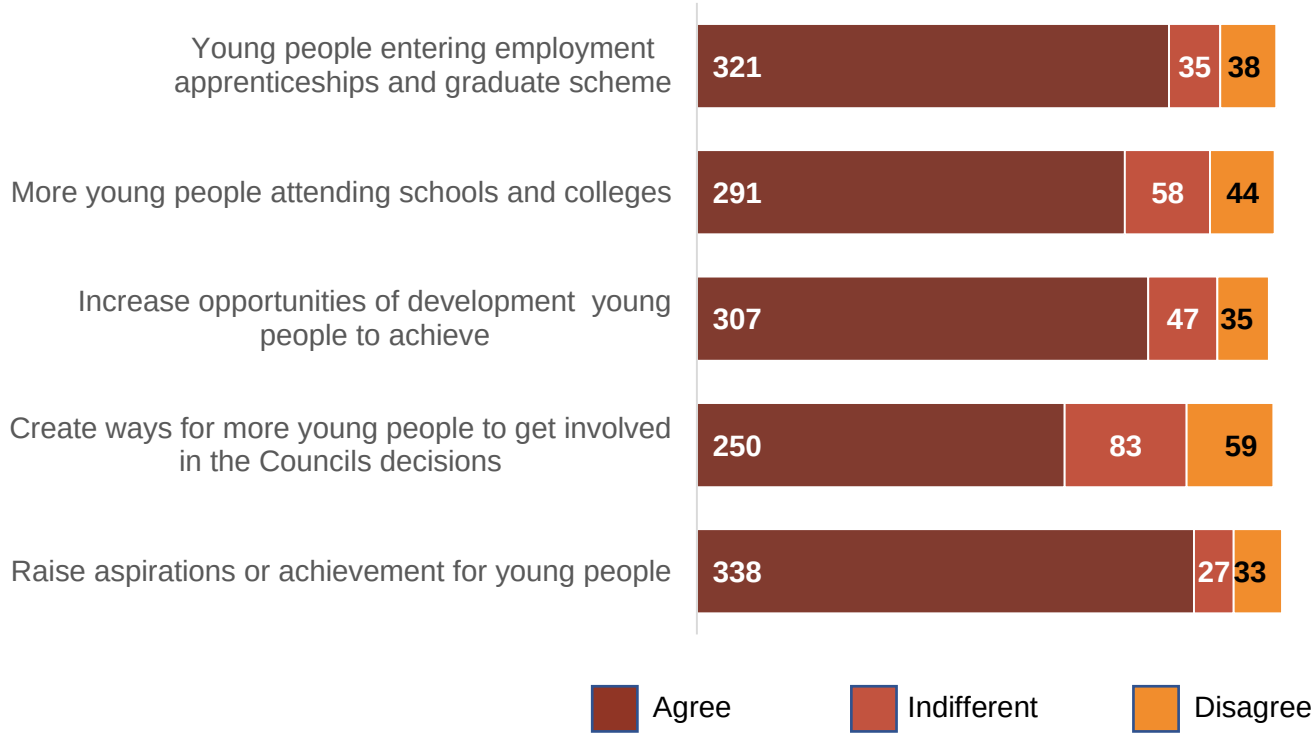
Response levels regarding a green economy were very low as was the response to more sustainable living. As mentioned in Strategic Priority 1, the need for developing vocational skills and green skills did receive positivity but no comments were made about the use of the Civic Centre or land ownership opportunities. Additionally, responses to a representative workforce (desired outcome 4) were also low.



Strategic Priority 4 – The Best Start in Life

Priority 4 was seen as important to residents. In particular, desired outcome 1 (Raised Aspirations, Achievement and Attainment) was popular as respondents agreed with raising aspirations for younger people in the borough, in tandem with providing more employment opportunities to help facilitate this. Ways to achieve this, including supporting young people through local apprenticeships and graduate schemes, scored highly. A large emphasis was also placed on vocational training and the importance of it instead of, or with support through more traditional academic channels. However, some respondents felt that their communities were excluded from these promises in the Borough Plan as specific mentions are only made

for the Black, African, Caribbean and Somali communities. Suggestions were made that we should also mention newer, emerging communities into this outcome.



Strategic Priority 5 – A Healthier Brent

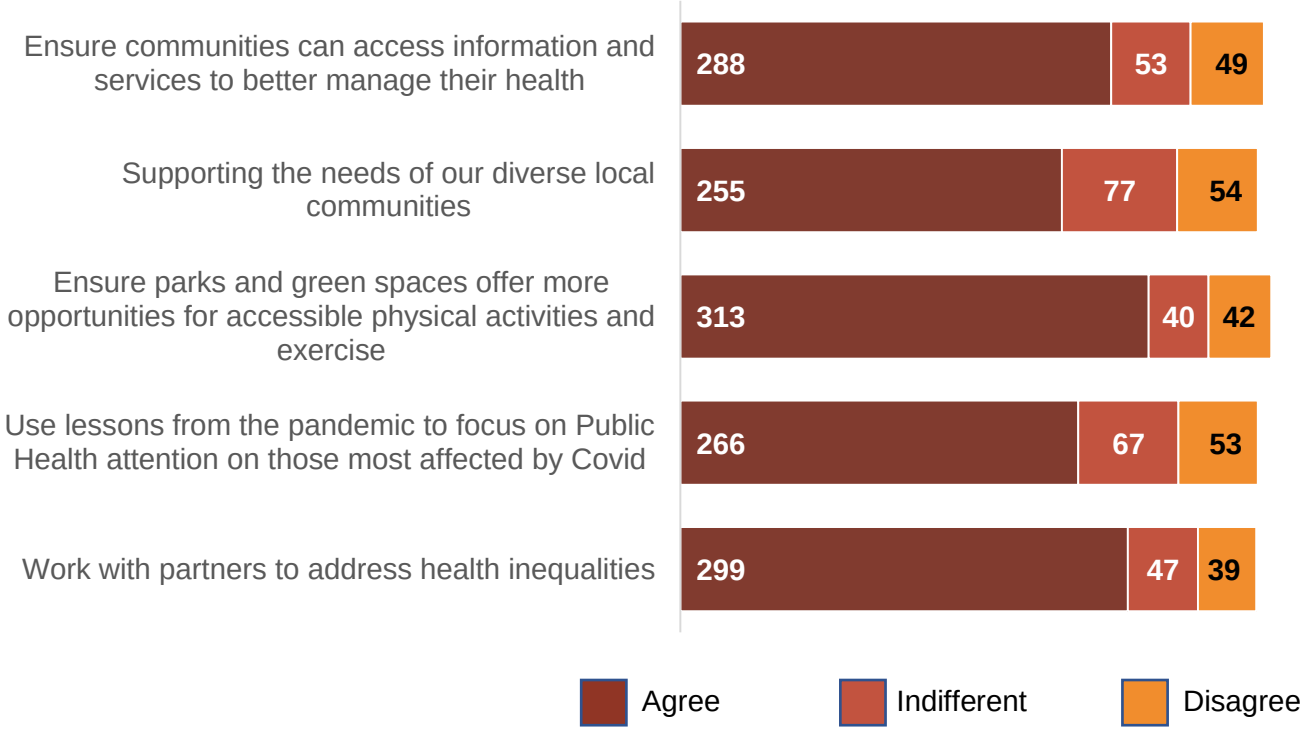
In response to **Priority 5** residents wanted to see further work with partners to address health inequalities, as well as ensuring all communities could access information and better manage their health. Responses were focused more on delivery and access of services rather than community engagement.

Respondents wanted to ensure the borough's parks and green spaces offered opportunities for accessible physical activities and exercise. The delivery and promotion of outdoor gym and exercise areas were high on their list of priorities.

A major concern with many respondents was around access to NHS services, particularly access to face-to-face GP appointments. The general feeling is that GPs are not accessible and longer waiting times for appointments need to be addressed immediately.

Tacking mental health was also mentioned as a concern for our residents. Numerous comments were made regarding mental health issues in the community both in adults and young people. It is felt that the Council can do more to promote existing initiatives and treatments available as well as working closer with the NHS and other partners to ensure delivery of therapies and education on how to manage mental health issues such as depression, gambling, and opiate use.

Several respondents made comments regarding Covid-19 vaccines and misinformation that has and still circulates through independent community channels. There was a general feeling that the Council can still do more to educate residents on the effectiveness of the vaccines and subsequent boosters.


Ensure communities can access information and services to better manage their health
288
53
49
Supporting the needs of our diverse local communities
255
77
54
Ensure parks and green spaces offer more opportunities for accessible physical activities and exercise
313
40
42
Use lessons from the pandemic to focus on Public Health attention on those most affected by Covid
266
67
53
Work with partners to address health inequalities
299
47
39
Agree
Indifferent
Disagree

What did people have to say about Brent?

This section captures key findings from the qualitative engagement and exercises that were undertaken which includes activity such as workshops, focus groups, meetings and events with residents and partners. Through slightly different approaches and questions, based on the audience, each exercise explored and aimed to understand:

- Feedback on the draft priorities
- The audience's priorities and the issues that mattered to them
- How we can work together to realise and achieve our collective ambitions for Brent

Residents and partners were generally positive about the draft priorities, finding that the key issues and components were present. However, there were clear areas within the draft ambitions that should be reframed, updated or amplified. These key areas are detailed in the themes below.

Environment

This theme encompasses feedback centred around 'clean' and 'green'. The clear overarching reflection across all forms of qualitative engagement was the need to amplify and strengthen our commitments around climate change, including reference to the activity undertaken over the last few years to frame these ambitions, and to be more transparent around how we will make the borough cleaner. This theme includes concerns, suggestions and ideas around the following issues:

- Air quality – being clear around commitments to reduce emissions and being more ambitious in our action and targets to improve air quality.

- Active travel – in conjunction with feedback around air quality, many people wanted to see more actions around improving active travel. For example, extending cycle lanes, encouraging active travel measures and a suggestion that Brent further aligns itself with Transport for London's walking and cycling strategy to encourage more active travel in the borough.

- Fly-tipping and littering – This issue was raised both in relation to the visible cleanliness of the borough and ensuring we are clearer on how we can address this, in addition to the secondary impact of fly-tipping on the natural environment. To reduce littering, suggestions were made around employing a stricter framework to greater enforce penalties against things like littering, fly tipping, dog fouling and street drinking, to deter residents from engaging in these behaviours. Additionally, some points were raised about bins being emptied more regularly.

"If Brent employed more officers to patrol and issue fines, the people dropping rubbish would pay fines which could be reinvested in keeping streets cleaner".

- Green energy – The Council could better explore options around green energy, particularly as a result of increased energy prices due to the cost-of-living crisis.

"As the price for electricity & gas explodes we should be doing more to cut those costs".

Crime and Safety

This theme is centred around the importance of feeling safe and being clearer, within the Borough Plan, about our activity around community safety. This theme includes concerns, suggestions and ideas around the following issues:

- Feeling safe – this was an issue for all audiences. We heard an overwhelming response from young people that they would like to see more street lighting to improve safety at night, particularly for young

women, and had concerns about violence and safety on public transport. Others said that they would like to see more CCTV in areas of the borough where crime was highest.

- Anti-social behaviour – many spoke about anti-social behaviour across the borough and the need to create safe environments on high streets. People describe a range of different issues, namely substance misuse.

Housing

The theme captures a range of feedback linked to housing, including housing quality and stock and population density. This theme includes concerns, suggestions and ideas around the following issues:

- Housing stock – many people aligned this to environmental issues, namely the adapting the Council's housing stock to the issues posed by climate change, including insulation and improved energy efficiency in homes. There were also concerns around the rise of Houses in Multiple Occupation (HMOs) and would like to see these reduced.

- Housing quality – this issue is twofold:
    - Some people are concerned the boroughs population density is having a detrimental impact on the quality of housing available to residents and the possible effects on access to public services and, more broadly, community cohesion.
    - Other feedback focused on aesthetics and affordability, stating they would like to see greener front gardens in the borough, with the dual purpose of improving the aesthetic landscape of local areas, as well as helping to tackle the climate emergency. In conjunction with this, people also referred to the high cost of housing in the borough, with private renting being more expensive and leading to being unable to afford a better home with more outdoor space.

Children and Young People

This theme encompasses key points linked to young people - generally, there was a feeling that the Borough Plan lacked enough focus on this area. This theme includes concerns, suggestions and ideas around the following issues:

- Skills development and employment opportunities – many respondents wanted to see young people provided with further opportunities outside of school to help shape and realise their ambitions, in addition to help prevent them from falling into anti-social behaviour or gangs. Aligned with this, some also expressed that there should be more jobs made available in Brent for young people, as well as providing enterprise and entrepreneurial skills, building on opportunities already available in the borough.

"Kids need more funding so they aren't searching for it elsewhere"

"Building on programmes already delivered in the borough, children and young people should learn enterprise and entrepreneurship skills in order to be prepared for work and the future of work"

- Local and specialist activities and facilities - Some people wanted to see more youth clubs in Brent, as well as monthly days out for children and teenagers, a type of initiative that happens in other London boroughs. During an exercise with young people, we heard that they would like to see more youth clubs and sports facilities in the borough. Additionally, some people spoke specifically around Special Educational Needs and Disabilities (SEND) provision – this was in reference ensuring the needs of SEND children are reflected with in Council decisions and seeing more facilities in Brent for families who required SEND support, particularly in the 16 and over age group.

Healthy Communities

This theme includes several issues that capture the value of community cohesion and the importance of health and social care. This theme includes concerns, suggestions and ideas around the following issues:

- Community cohesion – people recognise and value the diverse range of communities across Brent. To support our communities and encourage greater integration across them, some respondents expressed that they would like to see further social hubs in the Borough for all ages and communities, in conjunction with improving our green spaces and community spaces as a means of fostering a greater feeling of togetherness in the borough. Additionally, some felt that there should be further spaces designed for young children, similar to the playground around Wembley, outside the London Designer Outlet.

"We have a lot of isolation, young people with no space, older people with nowhere to go, and yet a wealth of knowledge, community spirit, and demographics with so much to offer"

- Investing in Brent, beyond Wembley – associated with ideas around community cohesion, many also voiced their concerns and perceptions around the borough being Wembley-centric i.e. receiving greater attention and investment. People want reassurance that areas outside of Wembley Park, such as Kilburn and Harlesden, would be fairly represented going forward, and receive similar levels of investment. This sentiment was also noted at the Brent Partnership event, with some stakeholders feeling as though 'Prosperity, Pride and Belonging in Brent' was more relevant to Wembley than the rest of the borough.

- Health and social care – there were several perspectives associated with this area, some of which also align with other emerging themes:
    - Both the Brent Integrated Care Partnership and Health and Wellbeing Board referenced the importance of aligning the Borough Plan with the Health and Wellbeing Strategy to ensure partners continue to work together to achieve our collective ambitions for Brent - for example ensuring health services, with other 'anchor institutions, employ more local people. Additionally, partners agreed to establish and maintain a dialogue with other organisations across Brent to ensure we strengthen relationships as we continue to deliver key services within a difficult financial context.
    - Accessibility to health services was raised by some people, this included increasing capacity in the community to support vulnerable and elderly people to help with transport to medical appointments, making phone calls and accessing online medical services. Additionally, others wanted to see more communication from health services in different languages – this was raised specifically by the Romanian community but may also be applicable to other areas.

Roads and Transport

Key issues raised with in this theme were around Low Traffic Neighbourhoods (LTNs) and accessibility for cyclists. This theme includes concerns, suggestions and ideas around the following issues:

- LTNs – this continues to be a polarised issue with some residents agreeing that there should be further LTNs in the borough, in line with traffic targets from the Mayor of London, as well as increasing the safety of cyclists. Conversely, other residents disagreed that LTNs were the correct approach for Brent, considering them inconvenient and an eyesore. Some respondents shared ideas around reducing traffic, for instance using more 'car clubs' in the borough, which would reduce the number of parked cars on streets, in addition to opening up the potential for the free space to be utilised for bike docking stations.

"If done well and consulted properly LTNs can enhance a neighbourhood (as has been seen in other areas of London)."

- Cycling accessibility and safety – the issue of safe cycling was raised by other stakeholders, with residents wanting to see further protected cycle lanes, particularly along the A5 and in the Chamberlyne Road area of the borough. There was also a suggestion around Brent introducing its own rental bike scheme, in conjunction with the South Kilburn regeneration scheme and in other areas which do not fall under the Transport for London docking stations area.

“A protected cycle lane on both sides would give more separation and protection for pedestrian and of course make it much safer and pleasant for Cyclists”

Local Democracy and Resident Engagement

This theme captures feedback and ideas around the voluntary sector and participation in decision making. This theme includes concerns, suggestions and ideas around the following issues:

- Voluntary, Community and Faith Sector – organisations from this sector expressed that their role in supporting residents and communities, independently and with the Council, should be reflected within the Borough Plan. Additionally, some residents also thought that the Council could do more work with Mutual Aid Groups, who had played a key role in the response to the pandemic.

- Council decision-making – some people said they would like to see greater transparency in the Council’s decision-making processes, including how money was spent and how resident complaints were dealt with. Furthermore, young people expressed that they would like more opportunities to get involved in work that the Council were doing, as well as having a greater say in Council decision making processes.

What should Brent look like in 2027?

Survey respondents were asked “What should Brent look like in 2027?”. This question aimed to encourage and enable respondents to think about the future by reflecting on how Brent can improve based on the issues that matter to them. Additionally, 2027 marks to end of the Borough Plan lifetime, therefore responses to this question helped to understand the level of ambition that respondents envisage.

The word cloud below displays the key reoccurring terms that respondents used in relation to the issues that matter to them and their aspiration from Brent. This provides a helpful indication of key themes the Council could prioritise for the next four years.

When analysing the demographic breakdown for the top five keywords: clean, safe, green, community and housing the following findings emerged:

Key word	Count
clean	93
safe	71
green	52
community	32
housing	32
education	29
young people	29
healthy	28
happy	24
environmentally friendly	20
inclusive	20

- Ethnicity – Black, Asian and Minority Ethnic respondents were less likely to use the keywords clean (32% of respondents were Black, Asian or Minority Ethnic, against 47% of respondents overall) or green (28%).
- Age – Young respondents were less likely to use the keywords clean (9% of responses vs 19% overall) or green (11%).
- Gender – Female respondents made up 49% of survey responses overall but represented 59% of the people who used the keyword clean, 59% who used green and 65% who used housing. Male respondents were more likely to use the keyword community, making up 71% of the respondents who used it compared to 51% of the survey overall.
- Postcode – Residents of NW10 were more likely to use the keyword clean (45% respondents vs 33% overall), mirroring their prioritising of the A cleaner, greener Brent priority.

Aligned with the word cloud, the following themes have been identified from detailed responses to the survey question, they have been roughly ordered based on frequency and prevalence.

Clean, Green and Safe

"A cleaner, greener, cycle friendly, reduced or traffic free borough with tangible investments in deprived areas."

Residents want to feel proud of the areas they live and for many, as reflected in the word cloud, this aligned with the collective theme: establishing a Cleaner, Greener and Safer Brent. When broken down into individual components respondents shared the following key points:

- A Cleaner Borough. Many residents wanted to see a visibly cleaner borough with less traffic and more active travel. This will help address poor air quality, an issue that is high on the agenda for many residents.

- A Greener Brent. Similar to establishing a greener borough, respondents also want a visibly greener borough with more trees and greenery. For many, to help unlock this, this includes having better maintained parks and open spaces.

- Feeling Safe. Most responses linked to safety centred around the importance of feeling safe, particularly for women and young people. Women's' safety was identified as an area which could improve in 2027, with survey respondents saying that they did not feel comfortable walking around areas of Brent at night, and that more access to information and support for women's safety could be provided. Aligned with this, responses referred to the need to reduce and prevent crime, focusing particularly on anti-social behaviour, violent crime and drugs.

Vibrant Communities

Residents want Brent's communities to thrive, central to this is the diversity across the borough and the vibrancy this brings. This theme encompasses two components – fostering greater community cohesion and inclusion and continuing to harness diversity.

- Diverse and Inclusive. People wanted to see Brent continue being a diverse and inclusive place and by 2027 envisaged an adaptable borough that could change with the times, aware of and responsive to the needs of residents and inclusive of the different communities that live and work in Brent. Associated with this, respondents also wanted to see digital inclusion - cultivating a creative, innovative and technologically advanced borough with more opportunities for online access for all residents.

- Community Cohesion and Inclusion. To complement calls to harness the levels of diversity, residents recognised the importance of belonging and how establishing cohesive communities can help ensure this. Many respondents championed the idea of greater integration within communities and more inclusivity, with some suggesting further links with the Council and faith groups in order to foster these relationships.

Affordable Housing

"Brent should put more focus on affordable housing"

Many residents wanted to see more housing in the borough, dealing with rogue landlords and providing a safe and decent standard of housing for all. Residents also wanted to see more affordable and 'better' housing that is supported by accessible infrastructure. Additionally, there were some conflicting views as some respondents wanted to see fewer tower blocks in the borough, whilst others appreciated the need to build more homes due to a shortage of housing.

Young People

“A multi-diverse, modern community with opportunities for all. More work experience and degree apprenticeship opportunity for the best start in careers.”

Respondents wanted to see Brent creating more opportunities and work experience to support young people into employment. This is both in an academic sense as well as providing incentives for young people to stay in Brent to work, such as providing more local graduate schemes and apprenticeships to keep talented young people in Brent. Additionally, people wanted to re-establishing youth clubs and local activities for young people.

When young people themselves were asked what the borough should look like in 2027, most young people expressed their hope to see Brent being safer and cleaner place where they will be provided with more opportunities.

Creating more jobs and developing skills:

“Brent should be a destination for business, commerce and residents to thrive, with money reinvested into the community”

People want to see more and better paid jobs in the borough and to accompany this, supporting local people to develop new and existing skills. Rejuvenated and prosperous high streets also have an important role to play for residents, as an opportunity to support local businesses.

Health and happiness

“A safe, caring borough that provides more services for those with mental health problems in the borough”

Respondents tended to align being healthy with being ‘happy’. Many respondents wanted to see a greater focus on mental health in the borough, with less waiting times for services and further awareness and signposting around men’s mental health services. This was also echoed by stakeholders including the Brent Integrated Care Partnership, who wanted to see a focus on mental health in the borough, particularly as a result of an increase in waiting times for mental health services after the Covid-19 Pandemic and lockdowns.

Annex A - Engagement Summary

Draft Borough Plan feedback – events and survey

Event	Attendees/number	Additional Notes
Workshops and focus groups	73	• Workshops open to residents and specific communities: 30 November and 8 December • Pensioners focus group: 7 December • Partner and stakeholder event: 9 January
Library drop-in sessions	Estimated 105	• Kilburn Library Drop-in Session - 8 November • Wembley Hub Drop-in Session - 23 November • Willesden Library Drop-in Session - 8 December
Partners events	Estimated over 350	Includes but not limited to: • Housing Department Licensing events • Healthwatch event • Pride of Brent Youth Awards • Gladstone Park Primary School • Brent Multi-faith forum • Local Democracy week event • Brent Connects x5 • VCSE Question Time • Disability Forum • Borough of Sanctuary group • Brent Youth Parliament • Brent Health and Wellbeing Board • Forward Together and other internal staff sessions
Survey responses	417	402 online survey responses 15 physical survey responses

Draft Borough Plan Outreach

Borough Plan Outreach		
Communication	**Number Contacted**	**Description**
Borough Plan Email	Over 13,500	Email detailing the Borough Plan, the survey, Focus Group events and Partnership Events sent out to organisations, residents, and partners in Brent
Calls detailing the Borough Plan survey and events	400	400 organisations contacted via phone with follow up emails sent out after the phone call regarding the Borough Plan survey, focus group events and partnership event

Paper Surveys in Brent Libraries	150 paper surveys placed in Brent hubs and libraries to promote inclusivity	
Media communications	Over 6000, sharing information regarding the Borough Plan survey and events	

Annex B – Demographic breakdown of survey responses

Of the 417 online surveys completed, many did not provide demographic information. The most completed questions were on age (228 responses, 55% of all surveys), gender (194 responses, 47%) and religion (193 responses, 46%). The least completed questions were whether the respondent has any caring responsibilities (158, 38%), postcode (156, 37%), and whether any illness affects their ability to carry out day to day activities (145, 35%).

- Ethnicity: Black (11 responses, 7% vs 18% of borough population) and Other (5 responses, 3% vs 10% of borough population) ethnic groups were underrepresented in survey responses. White groups were overrepresented, with 88 respondents making up 53% of the total responses compared to 35% of the borough population. White groups were predominantly White British, who alone accounted for 39% of total respondents.

- Age: Age is broadly in line with the borough population, with an underrepresentation of residents aged 22-30 (25 responses, 12% vs 19% of population). There were also six responses from residents under 18 which have not been included in the graph due to not having a specific age range to compare them to.

- Postcode: Most responses came from NW10 (48, 32%). HA0 was the only area with a significant underrepresentation, with 10 responses making up 7% of the total, compared to 13% of the borough overall.

- Respondent type: 226 respondents identified themselves as Brent residents (84%). There were 11 responses from Council employees, eight from councillors, seven on behalf of the voluntary sector and four on behalf of a school or college.

- Gender: 51% (92) of respondents were male and 49% (90) were female.

- LGBT+: 11% (17) of respondents who completed this question identified as LGBT+.

- Gender Identity: Four residents responded saying their gender identity did not match the sex they were assigned at birth, 2.3% of the 171 respondents for this question.

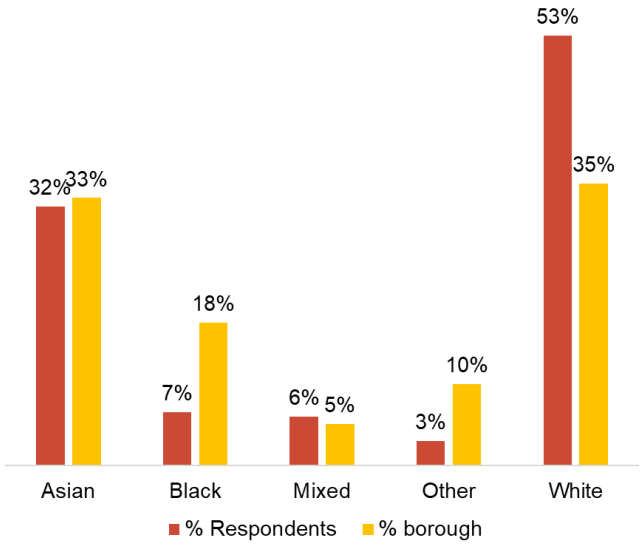
- Religion: Top responses for this question were no religion (59, 34% vs 14% of population), Christian (53, 31% vs 39% of population) or Hindu (28, 16% vs 16% of population). Although Muslims make up the second largest religious group in Brent with 21% of the overall population, they only accounted for 16 (9%) of survey responses.

- Disability: 18% of respondents said they had a disability, slightly above the 14.1% of the population (note: this is compared to 2011 census data as 2021 has yet to be published). Most people (19, 42%) declined to state the nature of their disability.

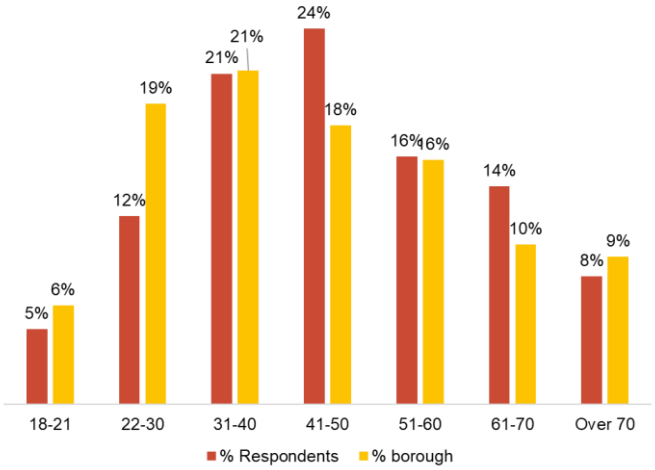
- Language: English was not the first language for 41 (25.5%) of the 161 respondents.

- Caring responsibilities: 23 out of 158 respondents (15%) said they had caring responsibilities for another person.

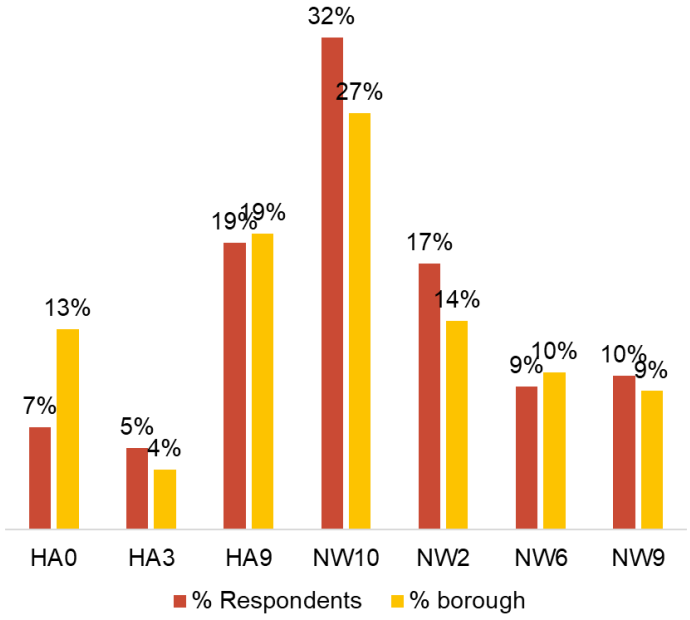
Respondents by Ethnicity



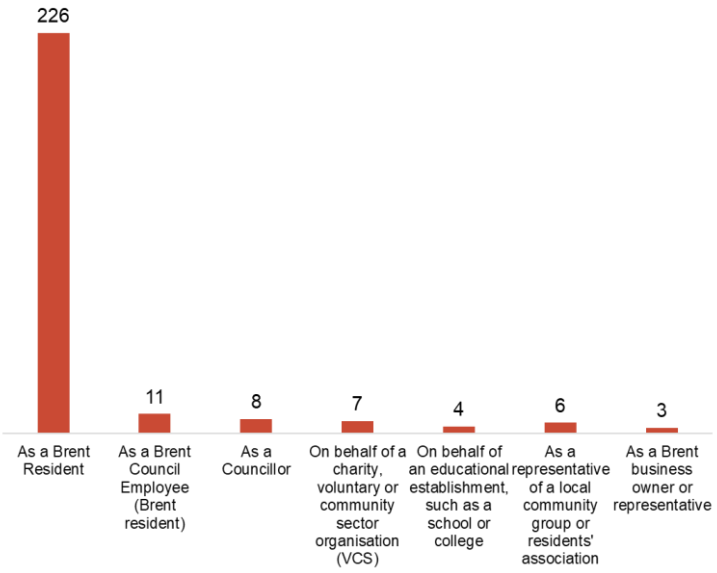
Respondents by Age



Respondents by Postcode



Respondent Type



Brent

Moving Brent Forward Together for 2023-2027

Brent

Brent Borough Plan forward

It gives me great pleasure to introduce Brent's Borough Plan for the next four years.

This document is informed by your priorities, expressed through your vote at the ballot box last year and through your participation in the Residents Attitude Survey that over 1000 people completed at the end of 2021. Throughout this plan, my eyes remain on the same principle as always – to leave no resident behind. This will be more important than ever, as we stare down the cost of living emergency together.

The plan on the following pages sets out the direction of travel Brent Council will take over the coming years. It is a snapshot of what we want to achieve and the path we will take to get there together.

What is still unclear is our destination. As you will recognise, four years is a long time in the world of today, where every day brings a new unknown and a different crisis to respond to. With every change comes opportunity and Brent is a borough of unlimited opportunities.

Over the last ten years, Brent Council has needed to strip out close to £200m from its budgets. We have needed to be agile, cut back our workforce and reduce spend. We have innovated, using new technology and modern ways of working. We have streamlined senior management and worked ever more closely with community groups and residents.

Our ambitions for Brent can regrettably diminish in line with inflation. The same rising cost of living that has affected us all individually has also cut our already shrinking pot of funding even further. Increased inflation does not only drive up the price of everyday essentials, it stretches the cost of goods, services, supplies and running buildings too. This has obvious effects on what it is we can deliver for you.

With all that said, we will look to continue our record as the Council of the Year, the award we received back in 2020 – recognising that despite the challenges, Brent Council will always take tough decisions in seeking to ensure that no one is left behind. We will continue to prioritise the most vulnerable in our community and make sure that essential services like waste collection, libraries, education, public health and care are protected.

In Brent, like every London borough – we face a constant balancing act between the many challenges that await us. We face unprecedented demand in housing services; many more residents requiring round the clock care in later life; an increase in interventions by children's social services; and the ever present need to keep our borough safe, secure and clean.

We have so much to be hopeful for though. We are a place of renewal; filled with people that come from far and wide, people that wish for a brighter future. Our children attend more Ofsted 'Good' and 'Outstanding' schools than ever. We will seek to deliver more genuinely affordable homes than any other London Borough and we will re-affirm our commitment to do whatever we can to respond to the Climate and Ecological Emergency before us.

Brent Council exists to serve you, our residents. I hope that our new Borough Plan shows that we are committed to supporting everyone that lives and works in Brent. Together we will build a better Brent, with a brighter future.

Cllr Muhammed Butt
Leader of Brent Council

Building a Better Brent – our journey

In Brent we think it is important to always talk to you, our residents, about what our plans should be now and in the future. In 2019 we spoke and engaged with residents (you) across Brent to decide on the five priorities to build a Better Brent. Since this, we also updated the plan during Covid. We wanted to make sure we supported you, the people of Brent, in the best way we could, by responding to the pandemic's impact on our communities.
Here are the previous priorities and what we have achieved so far:

Every opportunity to succeed

We focused on equipping our young people for the future. We wanted to improve attainment and exam results for our young people who are in or have left care, our young men of Black Caribbean heritage and to help young people to have more employment opportunities. We invested £44 million to upgrade our schools, adding 427 places for our young people with special education needs and disabilities. We have helped 1,000 residents into employment, including over 200 apprenticeships and 90 kick-start places.

A future built for everyone, an economy fit for all

We focused on how we could play our part in tackling climate change and improve air quality. By 2030 we aim for Brent to be a carbon-neutral borough. £500,000 has been provided to make residents' homes more energy efficient and for community groups to run education programmes. In Brent, we have installed over 21,000 energy efficient streetlights. We have fitted 515 electric vehicle charging points. We have planted 4,533 trees, 22 wild-flower meadows, and bee corridors to protect residents from harmful emissions.

A cleaner, more considerate Brent

We focused on how we could play our part in tackling climate change and improve air quality. We developed a Climate and Ecological Emergency Strategy to drive our ambition to become a carbon-neutral by 2030 and reducing the carbon footprint on our estate. We have also started to utilise our Carbon Offset Fund by spending £500,000 to make residents' homes more energy efficient and run green education programmes. Further measures include installing over 21,000 energy efficient streetlights, fitting 515 electric vehicle charging points and delivering over 100 new bike hangars. We have also planted 4,533 trees, 22 wild-flower meadows, and bee corridors to boost biodiversity and provide the green and natural infrastructure that provides a host of co-benefits to our residents.

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

We focused on crime, safeguarding, physical activity, and culture. We aimed to reduce anti-social behaviour and violent crime, with reported incidents falling over the last 4 years.
We strived to increase resident physical activity as we were the fourth lowest borough. We have installed 20 open space gyms and offered free instructor-led sessions. We sought Brent to be a borough where culture is celebrated and vibrant. We were awarded the Borough of Culture in 2020, which our culture services delivered successfully.

Strong foundations

We focused on making Brent a digital place, where our services meet the needs of residents and are value for money. We created a new way of working with our voluntary and community sector. Our digital strategy has set up a fund to provide residents with a free laptop internet, and training. We have given over £16 million in funding to our communities. We created a social value and ethical procurement policy, which means our suppliers have agreed to invest in Brent.

Our plan for the next 4 years

The new Borough Plan builds on our work and progress over the last four years but recognises that we have more to do. The Borough Plan will be a guide for the things we will prioritise and focus attention on as a council, as we try to make Brent the best place it can be.
We will support our residents and businesses through the cost of living crisis and help everyone to recover following the pandemic. We recognise that we need a Borough Plan that builds on the lessons we have learned and prepares us for the challenges facing our residents, communities, partners and businesses. We must also be honest and acknowledge that the cost of living crisis will impact our resources and capacity to provide everything we have in the past. We have listened to, and will continue to listen to residents and partners to decide the best way for us to respond to any upcoming challenges together.
We will continue to work in partnership with Voluntary and Community Sector organisations, and we recognise that they are a vital part of Brent. We will make use of their skills and expertise and support VCS organisations to be a sustainable and thriving sector.
We would like to build on the strong community spirit in Brent, which saw the council and residents working together so effectively during the pandemic. We want the council and the community to continue to work together, building on these strong foundations and making sure your voices are heard and influence the services we deliver. To capture your voices, in recent months we have consulted:

- Our young people,
- Our residents who are carers,
- Our residents with disabilities,
- Our older people,
- Our homeless community,
- Our business community,
- Our key partners e.g. NHS,
- Our community and voluntary sector,
- Our residents who are in low social-economic situation,
- Our staff.

To help present a picture for Brent and demonstrate how our ambitions are informed by data, we have put together the information we have gathered in one document **<<hyperlink>>**, published alongside the Borough Plan.
We have called this document an evidence base as it tells us the make-up of our borough, our needs, our diversity, our uniqueness, and also includes opportunities for Brent.
By building on what you told us and using the evidence, we commit to delivering a Borough Plan 2023-27 that prioritises:

1. **Prosperity and Stability in Brent**
2. **A Cleaner, Greener Future**
3. **Thriving Communities**
4. **The Best Start in Life**
5. **A Healthier Brent**

Strategic Priority 1: Prosperity and Stability in Brent

The cost of living crisis is affecting everyone in Brent, with residents and communities with the most complex needs being hit the hardest. In our residents attitude survey, one in five people stated their finances will get worse over the next year. We expect greater demand for our support as energy costs and use of foodbanks continues to increase.

We want to tackle inequality and ease the pressure of the rising cost of living. This means continuing to work with partners and building on our existing joint plans to reduce poverty and ensure everyone has access to direct support when they need it – whether it be financial, digital, welfare centred advice or for employment. This is also about making sure our residents and communities with more complex needs receive the best possible support. To enable this, we will continue our progress to be a Digital Place and Digital Council that make it easier for residents to access support and for us all to interact.

We will create more accessible and genuinely affordable housing. We want to be the leaders in London for inclusive housing development that works better for everyone. This means buying houses; building new social, accessible and affordable homes and improving our existing estates. We will also continue working with partners to increase the supply of private rented accommodation.

We want to be clear that Brent is open for business. This means building stronger partnerships to ensure our high streets and local organisations are able to thrive. To achieve this, we will support our business community in providing and developing appropriate training. This will help residents gain the high quality skills they need to access and secure local well-paid jobs.

DESIRED OUTCOME 1: Easing the Cost of Living Crisis

We will:

- **Work together with partners across Brent to reduce poverty. This includes spreading awareness, improving access to services and support and providing tools and resource to help residents improve their lives.**
- **Continue to develop and deliver a range of initiatives to best support, empower and equip residents. This includes the resident support fund and Digital Inclusion offers and new exploring new ideas such as a Community Shop model and upskilling of front-line professionals to provide holistic support.**
- **Deliver welfare support services from Brent Hubs to ensure residents access advice and guidance, help them to understand their rights and entitlements, promote Credit Unions and provide support that encourage small businesses to thrive.**
- **Provide tailored resources to those residents with the most complex needs to ensure our services are as accessible as possible and remove any unnecessary barriers.**
- **Work with partners, to create more opportunities for residents to develop skills and secure higher-paid jobs in growth markets, for example tech and green skills.**
- **Work with partners across the borough in developing a 'Built for Zero' approach to addressing rough sleeping which ensures there are less people moving into rough sleeping than there are being supported out of it.**

DESIRED OUTCOME 2: Safe, Secure and Decent Housing

We will:

- **Continue with our pledge to deliver 1,000 new council homes and be leaders in London in building inclusive and genuinely more affordable homes. This includes our pledge to deliver 5,000 new affordable homes within the borough, of which 1,700 will be directly delivered by the Council, by 2028**
- **Improve the quality of housing in Brent across the private sector and our own housing stock.**

DESIRED OUTCOME 3: Brent for Business

We will:

- **Improve the way we work with businesses to better support our high streets by increasing footfall and creating a Community Shops that encourage local shopping and increase the reuse, hire, and to reduce the cost of household goods.**
- **Lead by example and work with partners to employ more local people and create more opportunities to develop skills and training that help people to secure well-paid jobs.**
- **Work with neighbouring boroughs to attract more large businesses to the North West London and support them with local recruitment, skills and training.**
- **Better understand our business community so that we can raise awareness of appropriate training and employment opportunities for local people.**
- **Supporting community wealth building by encouraging retention of investment in the Brent economy and connecting local businesses to help them access supply chain opportunities.**
- **Empower businesses to become greener and more environmentally sustainable in their operations, through the launch of a new climate charter for businesses, access to a carbon footprinting tool, and grants/audits to reduce energy usage.**
- **Use our planning powers and land ownership opportunities to deliver more joined up projects and services with localities and neighbourhoods. Learn from good examples such as the Church End Council led development that will bring an additional £3m Social Value into the area**
- **Ensure our social value policy encourages all the organisations we buy services from to provide benefit to our local communities, through jobs, skills, apprenticeships and training places**

What Success Will Look Like

- Greater accessibility for our welfare support and advice programmes, including Brent Hubs, Family Wellbeing Centres, Resident Support Fund, Digital Inclusion, Fuel Poverty Toolkit, Fuel Vouchers, Brent Well and Warn service, Green Doctors.
- More council homes and more temporary accommodation provided by the council.
- More genuinely affordable and accessible homes available to families and residents.
- A digitally included borough with access to devices, internet connectivity, digital skills and a network of digital champions.
- Greater availability and uptake of skills development and training initiatives.
- More people securing work through training and development provided through Brent Works and Brent Starts.
- The council continues its commitment to, and encourages more businesses and partners to pay the London Living Wage.
- More people are employed in well-paid jobs and an increase in average hourly wage.
- Achieving the 'functional zero' definition which means there are less people moving into rough sleeping than there are being supported out of it.
- Greater collaboration with business on green and climate change initiatives e.g. through the Climate Charter for Businesses
- More local investment and social value commitments from our suppliers in Brent.

Strategic Priority 2: A Cleaner, Greener Future

We want to make Brent cleaner. However, if we want to deliver quality public services such as street cleansing, bin collections and park maintenance, we need you to tell us what you want and need from these services. We need to ensure there are ways for you do that, which give you the opportunity to influence decisions on council services and activity.

We want Brent to continue to grow, prosper and be a place where people want to live and work. To support this aspiration, we will do two things:

- **Ensure sustainability is central to the growth of our borough and local economy**
- **Invest to make our streets cleaner and healthier.**

We are excited to continue working with our residents, partners and communitie sto make sure Brent is a carbon neutral area by 2030 and for us to be one of the most biodiverse urban boroughs in London. If we achieve our objectives, we can future proof the borough to effects of climate change and bring about positive changes to our local community on many of the issues that matter to people such as cleaner air, greener spaces, warmer homes, healthier travel and a thriving local economy.

That's why we climate change through the delivery of Brent's first 'Green Neighbourhoods' projects, with a view to expanding these across the borough in the years to come.

Cleaner, greener and safer environments are also the key to communities becoming healthier. We want to enhance and improve green infrastructure on the public realm, deploy new models of working to keep our streets cleaner and support residents' mental and physical health through enhanced active travel infrastructure and continuing to make our award-winning parks even better.

The importance of transitioning to a Low Carbon Circular Economy model is also central to tackling the climate and ecological emergency. We will therefore prioritise new actions and initiatives that will help to reduce carbon emissions from the commercial/industrial sector whilst simultaneously supporting businesses in ways which will help with the rising cost of business. For example, by cutting their operating costs, growing their operations, and creating more secure and sustainable 'green' job opportunities.

DESIRED OUTCOME 1: A Cleaner Borough

We will:

- **Offer provision of high quality responsive universal services to all residents, ensuring we reduce negative impacts on the environment while delivering high standards and meeting our Customer Promise– for example, clean streets, waste collection, skills, parks and libraries.**
- **Invest in our roads and pavement improvement to help keep our streets clean.**

DESIRED OUTCOME 2: Climate-friendly, Sustainable Borough

We will:

- **Roll-out the council's first Green Neighbourhoods, working with local communities and providing the foundation for a greener, more sustainable local areas.**
- **Deliver the actions in our Climate and Ecological Emergency Strategy to tackle climate change by reducing consumption, resources and waste; accelerating the transition to sustainable travel; reducing emissions from our homes and buildings; and enhanced green infrastructure.**
- **Roll-out the council's first Green Neighbourhoods, working with local communities and providing the foundation for a greener, more sustainable local areas.**
- **Work with partners, through the West London Alliance, to create more opportunities for residents to develop skills and secure higher-paid jobs in growth markets, for examples tech and green skills.**

DESIRED OUTCOME 3: Keeping Brent on the Move

We will:

- **Deliver the Long Term Transport Strategy and Healthy Streets programme to encourage more active travel, including walking and cycling in safe, inclusive, designed environments.**

What Success Will Look Like

- **Successful implementation of Green Neighbourhood projects**
- **Implementation of all of the actions within our Climate and Ecological Emergency Strategy Delivery Plans**
- **A growing and active Brent Environmental Network, with localised networks supporting the delivery of climate action across the borough**
- **Maintain our recycling targets as a proportion of overall waste and improved outcomes from the mobilization of contracts as part of our Redefining Local Services Programme**
- **An increase in residents walking and cycling.**
- **Achieving our roadways and pavements maintenance targets.**

Strategic Priority 3: Thriving Communities

We want you, as a community, to have opportunities to take part in the council's decision-making processes. Brent Connects is a central part of our approach to this, as it allows residents to come together, discuss what matters most to them, and work with us to develop and test new ideas. We will continue to work with faith leaders, Brent hubs, and other voluntary and community sector partners to engage with under-represented groups. We know that there are hundreds of Voluntary and Community Organisations providing support, advice, recreation, activities and education in the borough. We want to strengthen our work with these organisations so that your involvement locally is actively used.

You have told us that safety should be the most important priority for the council. We commit to working hard to prevent crime and anti-social behaviour. Prevention is essential so we want to tackle the causes of crime. We will help people leave criminal lifestyles and we will pursue justice for victims. We will also work with our communities to build trust, prevent criminality and improve our response to crime.

DESIRED OUTCOME 1: Enabling our Communities

We will:

- **Introduce and deliver our new Community Engagement Framework. The framework is our plan to engage with people at a neighbourhood level to better capture and understand residents' voices, encourage greater involvement in council activities, and use different methods to do this.**
- **Support the Voluntary and Community Sector with clear communication and forums to provide insight, data and case studies of the lived experiences of residents.**
- **Deliver grant funding schemes that enable local people to lead on community activities that make measurable differences to improve local communities.**
- **Utilise Brent's diverse cultures to celebrate and acknowledge key events and encourage residents to come together in celebration and commemoration.**
- **Use our Social Value measures to bring additional value to the work delivered by VCS organisations**

DESIRED OUTCOME 2: A Safer Borough

We will:

- **Work with the Safer Brent Partnership to strengthen our early intervention approach to community safety, agreeing multi-agency interventions to reduce crime, exploitation and all forms of violence against women and girls.**
- **Keep our streets safe, by working with Partners to reduce harm to our community, preventing re-offending and bringing prolific offenders to justice**
- **Tackle anti-social behaviour, by working with drug and alcohol outreach services, businesses and residents. Ensuring that we identify emerging hotspots, intervene early and design out crime and anti – social behaviour.**

DESIRED OUTCOME 3: A Representative Workforce

We will:

- **Continue to strengthen our work force and its ability to deliver fair and equitable services through development and leadership programmes, ensuring the workforce is representative of the borough at all levels where we can.**

What Success Will Look Like

- **More local residents in council jobs, including those in graduate or entry level roles.**
- **Improve the representativeness of senior management, compared to the Brent population, within the organisation**
- **Reduced incidents of anti-social behaviour and fear of crime.**
- **Increase the number of residents taking an active part in Brent Connects meetings**
- **Increase the number of engagement events that take place across the community – so that resident can share their views on things that matter in their local areas frequently**
- **Develop the Community Directory as a shared resource with community organisations to provide accurate information that is regularly updated**

Strategic Priority 4: The Best Start in Life

We want our babies, children and young people to get the best start in life. We want them to receive the support they need when they need it. To do this, we will work through our Family Wellbeing Centres, with partners, communities, businesses and residents, and in particular our young residents. We also want to ensure our children and young people are safe and will aim to achieve this by improving our approach to safeguarding, including for those who are transitioning to adulthood.

We will raise attainment and aspirations. Working with schools and partners we will make sure access to education is fair and equal. We also want our young people to receive a quality education, which develops their skills and allows them to achieve their potential and realise their aspirations. This includes ensuring there is tailored support for our Black African, Caribbean and Somali communities to harness their talent and potential. We will also deliver our SEND strategy, which includes investing in additional SEND places and opportunities for post-16 skills development for young people with SEND.

We want all our young people from all backgrounds to be seen and heard in our services. We will create more opportunities and spaces to empower our young people to have their say - for example, the Youth Advisory Group used their lived experience to influence the delivery of the Black Community Action Plan. We will constantly review how we engage with our young people to ensure the voices of different groups of young people from across the borough can shape our services, from newly arrive refugees to long established communities; from young people with disabilities to those who belong to LGBT+.

DESIRED OUTCOME 1: Raised Aspirations, Achievement and Attainment

We will:

- **Supporting every child and young person to access high quality education.**
- **Raise aspirations and address any underachievement from age 0-25 by promoting inclusion and inclusive settings, schools and post-16 provision.**
- **Focus on young people from Black African, Caribbean and Somali communities, through the Black Community Action Plan initiatives to continue to develop future community leaders.**
- **Improve our approach and support around safeguarding, both in relation to contextual and transitional safeguarding**
- **Establish an integrated offer of early intervention and prevention for all families from conception to adulthood, delivered through our Family Wellbeing Centres. This includes tailored support available for those who need it most.**
- **Ensure the Children's Trust and Integrated Care System provide value for money and build better partnerships to improve our Children's Services.**

DESIRED OUTCOME 2: Young People are Seen and Heard

We will:

- **Enhance our existing young peoples' forums, including Brent Youth Parliament, School Councils, Care in Action and Care Leavers in Action (Brent's Children in Care Council) and Youth Advisory Groups by encouraging greater involvement of diverse groups and newly arrived residents.**
- **Encourage young people to become active in their communities and ensure their voices are central in our key sustainability projects.**
- **Directly engage with our young people across all service areas using approaches and methods outlined in the Community Engagement Framework.**

What Success Will Look Like

- **More your people leave education better equipped for future life.**
- **More your people have the skills and attributes for work, enabling them to make a positive contribution to their communities.**
- **More your people to enter employment including apprenticeships and graduate schemes.**
- **Improved opportunities and achievements for people from Black African, Caribbean and Somali communities.**
- **Increased use and take up of Family Wellbeing Centre support and offers.**
- **More opportunities for young people to participate in decisions, including more engagement with young people and people from a range of different communities.**

Strategic Priority 5 – A Healthier Brent

The pandemic highlighted the health inequalities that exist in our communities. In Brent, we saw that there were more Covid cases and deaths in some groups, specifically: older people; men; Black and Asian people; and those living in more deprived areas. We know that there are a range of underlying factors such as housing, employment, and income that contribute to these inequalities. To tackle this, we want to establish ways to improve health outcomes for those who need it most.

We will learn from the pandemic. We will make sure our health and social care services meet local need and reduce health inequalities. We will combine efficient universal provision with tailored and targeted interventions for those communities who experience our services as "harder to access". Developing those targeted interventions means engaging with our communities and health partners to understand the challenges and differences that exist. We will use this information to develop community-centred approaches and solutions. We also want to improve communication with our communities so our residents know to access support and improve their health.

We want Brent to be a healthier and stronger borough where everyone can live independent, safe and happy lives. We can do this by supporting the most vulnerable and removing barriers all residents face to becoming physically active. This includes making our green spaces, walking, and cycling routes more accessible, friendly, inclusive, and well-maintained.

DESIRED OUTCOME 1: Tackling Health Inequalities

We will:

- **Work with our local NHS and community and voluntary sector partners through the Brent borough based partnership to address health inequalities and to deliver priorities in the Health and Wellbeing Strategy.**
- **Ensure children's physical health, mental health and wellbeing are prioritised.**
- **Ensure all adults with care and support needs are able to access support and services and they are integrated with health, culturally competent and responsive to individual need.**
- **We will work with residents, as partners in their own care and support, to live independent, safe, happy and fulfilling lives**
- **Explore inequalities in access, outcome and experience in health and care by ethnicity, deprivation or disability and work with our communities to develop targeted plans to address these.**
- **Maintain preparedness to cope with public health emergencies.**
- **Work with NHS and partners to deliver more cross-sector working within services that impact on health, such as housing, mental health and community safety.**
- **Continue our community based work through Brent Health Matters and work with NHS partners to increase more community led approaches.**
- **Make sure Parks and Green spaces offer everyone opportunities for accessible physical activities and exercise.**

DESIRED OUTCOME 2: Localised Services for Local Needs

We will:

- Create integrated community neighbourhood teams that will enable more locality-based decision-making and delivery of services that meet the needs of Brent's diverse localities.
- Strengthen our commissioning approach to prevention and wellbeing and ensure residents are involved in deciding local solutions.
- Support our Primary Care services to increase the level of support available through new and innovative approaches, including an increased role for community pharmacies.
- Support people to look after their mental health and wellbeing, and ensure our support for people with mental illness is holistic and also responds to their physical health needs as well as their wider aspirations, for example employment and housing
- Continuing to support people to be cared for closer to home, by developing health and social care community services to help people, including those with complex needs, to live at home independently while also addressing key health issues including heart disease, respiratory conditions.
- Engage with communities to ensure they can access information and services to support them in managing their health better. This includes investing and working within our Voluntary Community Sector, community and partner organisations.
- Build on the successful methods of communication and engagement used during the pandemic, such as webinars with key speakers and social commentators for ongoing discussion with residents.
- Work with the NHS, the voluntary sector and residents to design and develop a community campaign to address the harmful use of alcohol across Brent. This includes continuing to offer those residents directly impacted by problematic drug and alcohol use access into our New Beginnings Treatment Services backed by a 24/7 helpline.

What Success Will Look Like

- More accessible facilities in public spaces.
- Reducing health inequalities, particularly for groups disproportionately impacted by Covid and through co-designed approaches with communities.
- More people enabled to sign up to GP practices.
- Improved outreach to communities and residents and more services provided in local community spaces.
- More people engaged with the Brent Health Matters team.
- More people supported to live in their own home
- Improved physical health, housing and employment outcomes for people accessing mental health services.
- More people accessing local community services and reduced demand for acute/emergency services.
- Increased number of local residents engaging with drug and alcohol treatment and recovery services

Black Community Action Plan

In July 2020, Brent talked to its Black community about the inequalities they face. Together we developed our Black Community Action Plan to address these inequalities.

Brent Connects

Brent Connects is a space for local communities to come together, discuss the things that matter most to you and work with the council and its partners to develop and test new ideas that will improve the lives of Brent residents. There are five Brent Connects areas.

Brent Health Matters (BHM)

Brent Health Matters is a programme to reduce health inequalities. BHM works with the local communities to find out what services they want and need. It then delivers those services in a way which is easy for local residents to access.

Brent Joint Health and Wellbeing Strategy 2022-27

The Joint Health and Wellbeing Strategy is the Brent Health and Wellbeing Boards collective vision and approach to reduce health inequalities and wider determinants of health inequalities.

Brent Hubs

Brent Hubs provide advice and support for residents in different locations across the borough.

Brent Customer Promise

The Brent Customer Promise is our commitment and promise sets out the standards of service you can expect from us whichever service you use.

Community gardens

A community garden is owned and run by the local community. It is often used to grow food.

Contextual safeguarding

An approach to safeguarding that recognises that young people may be at risk of significant harm not only within their home environment, but also outside it.

Digital Council

Digital Council is a term used in our Digital Strategy. It means that we are improving the way we use technology and data. By collecting data in an ethical and secure way we are using it to make our services and information more accessible, personalised and responsive.

Digital Place

Digital Place is a term used in our Digital Strategy. It means we are building a borough-wide digital infrastructure providing fast connection to the internet. It also means we are providing training to improve residents digital skills.

Integrated Care Partnership (ICP)

The Integrated Care Partnership is a partnership of local health and care providers in Brent. Its aim is to improve local health and remove health inequalities.

Local Plan

The Local Plan is a collection of planning documents which sets out our strategy for future development in Brent

Long Term Transport Strategy 2015-35

The Long Term Transport Strategy 2015-35 shares Brent's strategic direction for investment in transport throughout the borough over the period of 2015 to 2035.

Resident Support Fund

Brent's Resident Support Fund is a support fund available to residents who are in financial difficulty.

SEND

SEND is an acronym which stands for Special Educational Needs and Disability. You can view the Brent SEND Strategy 2021-25 here

Transitional safeguarding

A safeguarding approach and response that addresses specific developmental, social and contextual needs from a person going from adolescence to adulthood.

West London Alliance

The West London Alliance is a partnership between seven London boroughs. They are: Brent, Barnet, Ealing, Hammersmith and Fulham. Harrow, Hillingdon, and Hounslow.

FOOTBALL FOUNDATION
Premier League
TheFA
For All
Department for Digital, Culture, Media & Sport
TOGETHER FOR FOOTBALL
STADIUM FOR THE FUTURE
THE SUMMER EXPERIENCE

Garden waste collections
VEOLIA
Brent
DENNIS
VEOLIA
ELITE 6
VX15 KFA

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Borough Plan 2023-27
Evidence Base

Brent

Introduction

This pack will be used as a supplementary appendix to the Brent Borough Plan 2023-27. This document should also be view alongside the Borough Plan Engagement Findings Report 2023 which captures key feedback, ideas and suggestions during the draft Borough Plan 2023-27 consultation.

The evidence base aims to contextualise the overarching ambitions and priorities for Brent over the next four years. It brings together information about challenges and opportunities for the borough, both about the local, national and global context in which we are working and information on what the council is doing under each priority.

It contains data from Brent Council, central government, partner organisations, and Census 2021. Any data included is already be available online through Brent websites (including data.brent.gov.uk), government departmental websites and partner organisation websites.

Brent

Who We Are

Brent has

339,800

residents, making us the **fifth largest** borough in London

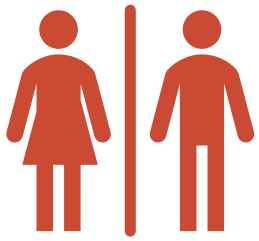
19% of our population is **under 16**, and 11.6% is **65 or older**

56% of residents were born outside of the UK

65.4%

of residents are from a Black, Asian or Minority Ethnic background

3.2% of Brent residents are LGBT+



51% of Brent's residents are female and **49%** are male

After English, our most spoken languages are **Guajarati**, **Romanian** and **Arabic**

Source: Census 2021

Brent

What should Brent look like in 2027?

Prosperity and Stability in Brent

Quotes from the draft Borough Plan consultation

*"More **education opportunities** for adults."*

*"**No person living in poverty**."*

*"More **work experience** and degree apprenticeship opportunities for the **best start in careers**."*

*"Brent should put more focus on **affordable housing** and supporting residents."*

*"**End homelessness** in Brent."*

Prosperity and Stability in Brent

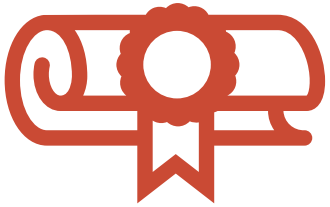
Context Setting

33% of Brent residents **live in poverty** once their housing costs are taken into account [1]

31,974 parcels were given out by **local food banks** in 2020/21 [2]

36.2% percent of people live in the **private rented sector** – more than any other [3] tenure type

28% of Brent residents earn less than the living wage of £11.05 per hour [4]



7.7% of residents aged 16-64 have **no formal qualifications at all** – the second highest level in [5] London

There were **1,671 Brent households in temporary accommodation** [6] at the end of June 2022

1. ONS Small Area Poverty Estimates 2. Combined figures from https://www.trusselltrust.org/news-and-blog/latest-stats/end-year-stats/ and https://www.sufra-nwlondon.org.uk/2022/05/03/sufra-annual-report-2020-2021/
3. Census 2021 4. Annual Population Survey 2021 5. Census 2011 6. Internal Brent Council data

Prosperity and Stability in Brent

What We've Done

Our **Resident Support Fund** received **6,609** applications in 2021-22, **501** of which were for the digital support package

Demand for **Community Hubs** is growing, with **11,823** residents seeking help in 2021-22

At the end of June 2022, Brent had so far delivered **660 homes** of its 1,000 new council homes target. There are additional **496 homes** on site and another **440** with planning permission and moving to site shortly.

Last year **273** residents were helped into **employment or apprenticeships** through Brent Works – **171** of these were in work paying on **or above the London Living Wage**

Internal Brent Council data

A Cleaner, Greener Future

Quotes from the draft Borough Plan consultation

*"Vibrant, **green, and energy conscious**."*

*"**More trees**, wildlife and greenery, well kept parks."*

*"A **greener borough** with increased tree cover."*

*"More **accessible services**."*

*"There should be much less traffic and **litter/fly tipping**."*

*"**Cleaner, less pollution**, less traffic, less waste"*

A Cleaner, Greener Future

Context Setting & What We've Done

Brent Council looks after 114 **parks and open spaces** covering 458 hectares.

In 2020-21, only **33.4%** of Brent's Household waste was recycled

We cleared 27,363 **illegal rubbish dumps** in 2022

In 2022 we collected over **85,000** tons of waste and recycling

We covered **2,400 miles** of the borough's roads with **230 tons** of salt with the help of carbon-friendly electric salt-spreading gritters

Internal Brent Council data

Thriving Communities

Quotes from the draft Borough Plan consultation

*"**Safe** for everyone."*

*"More **representative workforce** – diversity"*

*"The borough would have **improved roads**, access and parking for residents."*

*"Good **roads and pavements**."*

*"Less crime and **better street safety**."*

*"**Better road infrastructure**, less traffic jams."*

Thriving Communities

Context Setting

In 2021/22 only **66.6%** of Category 2 defects (non-emergency repairs to highways/footways) were responded to within their target time [1]

58% of residents would like to be **more involved in decisions** made in the local area [2]

In 2022 there were **944** robbery, **1,970** burglary, and **6,423** theft offences [3] in Brent

There were **502** knife crime offences in Brent in 2022 and **51** gun crime offences [3]

In 2022 there were **3,722** domestic abuse offences, including **903** offences of violence with injury [3]

1. Internal Brent Council data 2. Brent Council Resident Attitudes Survey 3. Metropolitan Police Crime Data Dashboard

Thriving Communities

What We've Done

99% of contacts procured meet the London Living Wage standard, and 35% of Brent suppliers are locally based.

Over **£3m** in revenue income was secured from our commercial portfolio in 2021-22

Brent has the most ethnically diverse workforce of all London councils with **66%** of staff identifying as Black, Asian or Minority Ethnic, compared to 46% for London as a whole

In 2021-22, 17 local **apprenticeships and work experience opportunities** were created with suppliers as part of our Social Value and Ethical Procurement Policy

641 residents attended the 10 **participatory budgeting decision day** events, with **89** local projects being either fully or partially funded.

Internal Brent Council data

The Best Start in Life

Quotes from the draft Borough Plan consultation

*"Trying to build more **youth focused community initiatives**."*

*"**More engaged** young people."*

*"Where children can go **healthy and happy**."*

*"A place where children whatever their background are given **a fantastic start in their early schooling**."*

*"Young people should have access to **more work experiences**."*

*"Happier, cleaner, greener and **youth focused**."*

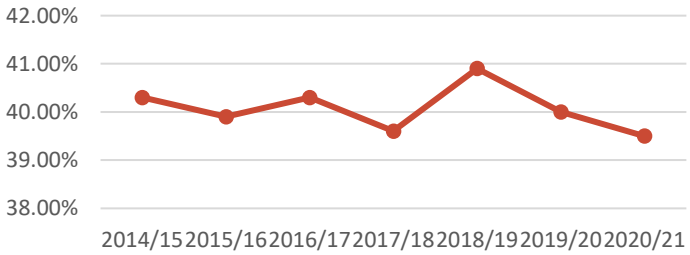
The Best Start in Life

Context Setting

62% of Key Stage 2 pupils meet the expected standard in **reading, writing and maths** – this is the fifth lowest in London, below the 66% average[1]

14.3%
of pupils have Special Educational Needs and Disabilities[2]

Child poverty in Brent is **39.5%**
a figure which has changed very little in the past eight years[3]



Only **77%** of three and four year old children in Brent benefit from funded early education, compared to 92% nationally[4]

7,765
pupils are eligible for free school meals[5]

1. Department for Education (DfE) Key Stage 2 Attainment 2. DfE Special educational needs 3. End Child Poverty 4. DfE Education provision for children under 5 years of age in England 5. DfE Schools, pupils and their characteristics

The Best Start in Life

What We've Done

In 2022 we supported **4,644 families** at eight Family Wellbeing Centres

In 2021/22 we completed

269

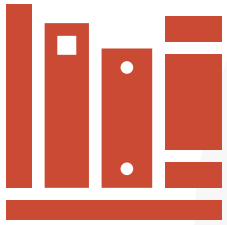
Early Help Assessments and reviews per 10,000 children, with new workers embedded in the Early Help Service to help us exceed target

In 2021/22 **46** residents engaged with **Moving on Up**, our programme supporting young black men aged 16-24

81%

of Looked After Children in years 12 and 13 are in **education**, **employment** or **training**

97.6% of our schools are rated Good or Outstanding by Ofsted



Internal Brent Council data

A Healthier Brent

Quotes from the draft Borough Plan consultation

*"More services for those with **mental health problems** in the community."*

*"Healthier, **more activity** within all age groups so that we reduce the chances of health issues in the future."*

*"Healthy – **less obesity**."*

*"**Healthy**, happy and community minded."*

*"A happier borough, **mental health focus** and opportunities for developing community resilience."*

A Healthier Brent

Context Setting

Only **18.7%** of people in Brent aged 40-74 have received an **NHS health check** – well below the London average of 33.0%[1]

40.1% of Brent five year olds have **visually obvious dental decay**[2]

Brent is ranked ninth in London for the prevalence of obesity in year six pupils, with **25.2%** of pupils being obese[2]

29.6% of Brent children are active for an average of **less than 30 minutes a day**[3]

8.9% of Brent residents aged 17+ have **diabetes**[4]

59% of residents feel there are enough opportunities to **improve their health through exercise**, down from 69% in 2018[5]

1. Office for Health Improvement and Disparities: Optimise Health & Reduce Risks Early 2. Office for Health Improvement and Disparities: Child Health Profiles 3. Sport England Active Lives Survey 4. Office for Health Improvement and Disparities: Diabetes Prevalence and risk 5. Brent Council Residents' Attitudes Survey

A Healthier Brent

What We've Done

In 2022 we organised health events which were attended by over

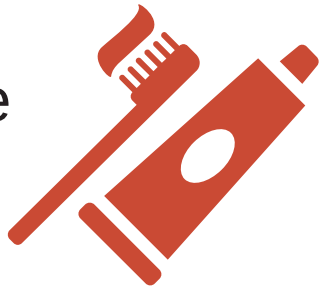
3,000

people, and completed almost **2,500 free health checks**

In 2021/22, there were **1,148,815** wet, dry or virtual visits to Brent's sports centres

60.8% of new birth visits took place within 14 days in 2021/22

534 free dental checks took place in 2022



All residents live within one mile of one of our **20 outdoor gyms**

Internal Brent Council data

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	**Borough Plan 2023 - 27**
DEPARTMENT:	**Communities & Regeneration**
TEAM:	**Strategy & Partnerships**
LEAD OFFICER:	**Tom Pickup**
DATE:	**23.01.23**

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 Brent Borough Plan 2023-27 captures the council's achievements over the last four years and provides the context, narrative and strategic priorities for our new ambitions. It states our provisional commitments and desired outcomes for the next four years and outlines how we will work with others to achieve them.

Mindful of the impacts the cost of living crisis and the pandemic has had on our Borough, the Plan aims to overcome existing challenges, but also identify and utilise new opportunities for all who live and work in the borough.

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

The Borough Plan provides ambitions to make the Borough a better place for all, especially those who may require additional support and help. However, we also understand that we have framed and will seek to deliver our ambitions within a period of financial uncertain for our communities, our organisation and sector. Therefore, we will need to be adaptable and ready to manage our level of ambitions to reflect the context we are operating in.

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. The Borough Plans ambitions are strongly linked with two components of the PSED: The need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:

- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and
- encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low and

The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This includes having due regard to the need to tackle prejudice and to promote understanding.

As the Borough Plan aims to promote equality of opportunity and understanding as well as minimise disadvantage, it is believed that the Plan should generally have a positive impact. However, given the financial context that we are all operating in, we must also be prudent and understand that the ability to deliver our ambitions may be limited over the next four years. Hence, we will are stating an overall neutral impact.

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	Impact Neutral/None	Impact Negative
Age		**x**	
Sex		**x**	
Race		**x**	
Disability *		**x**	
Sexual orientation		**x**	
Gender reassignment		**x**	
Religion or belief		**x**	
Pregnancy or maternity		**x**	
Marriage		**x**	

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

Screening Checklist

	YES	NO
Have you established that the policy or proposal *is* relevant to the council's public sector equality duty?	**x**	
Does the policy or proposal relate to an area with known inequalities?	**x**	

Would the policy or proposal change or remove services used by vulnerable groups of people?		x
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	

If you have answered YES to ANY of the above, then proceed to section B.
If you have answered NO to ALL of the above, then proceed straight to section D.

SECTION B – IMPACTS ANALYSIS

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

The Borough Plan has had extensive engagement. It is estimated that we have reached out to thousands of residents, communities and organisations and received around 900 responses to our online survey. The engagement involved as many people as possible, especially seldom heard voices. The engagement has consisted of the following:

- Drop-in sessions and community events
- A range of meetings and focus groups in each Brent Connect area
- Information sessions at libraries and hubs
- Online information sessions
- Online survey/ feedback form
- Multimedia campaign
- CitizenLab
- Focus groups with underrepresented groups
- Meetings with partnership and stakeholder groups

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

AGE

Details of impacts identified	The Borough Plan has priorities to improve the quality of life for all residents, service users and members of staff, especially those that are in most need of additional support and assistance. However, whilst we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents. The development of Key Performance Indicators will highlight specific work related to this protected characteristic and will be monitored and evaluated over time.

DISABILITY

Details of impacts identified	The Borough Plan has priorities to improve the quality of life for all residents, service users and members of staff, especially those that are in most need of additional support and assistance. However, whilst we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents. The development of Key Performance Indicators will highlight specific work related to this protected characteristic and will be monitored and evaluated over time.

RACE

Details of impacts identified	The Borough Plan has priorities to improve the quality of life for all residents, service users and members of staff, especially those that are in most need of additional support and assistance. However, whilst we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents. The development of Key Performance Indicators will highlight specific work related to this protected characteristic and will be monitored and evaluated over time.

SEX

Details of impacts identified	The Borough Plan has priorities to improve the quality of life for all residents, service users and members of staff, especially those that are in most need of additional support and assistance. However, whilst we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents. The development of Key Performance Indicators will highlight specific work related to this protected characteristic and will be monitored and evaluated over time.

SEXUAL ORIENTATION

Details of impacts identified	The Borough Plan has priorities to improve the quality of life for all residents, service users and members of staff, especially those that are in most need of additional support and assistance. However, whilst we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents. The development of Key Performance Indicators will highlight specific work related to this protected characteristic and will be monitored and evaluated over time.

PREGANCY AND MATERNITY

Details of impacts identified	The Borough Plan has priorities to improve the quality of life for all residents, service users and members of staff, especially those that are in most need of additional support and assistance. However, whilst we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents. The development of Key Performance Indicators will highlight specific work related to this protected characteristic and will be monitored and evaluated over time.

RELIGION OR BELIEF

Details of impacts identified	The Borough Plan has priorities to improve the quality of life for all residents, service users and members of staff, especially those that are in most need of additional support and assistance. However, whilst we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents. The development of Key Performance Indicators will highlight specific work related to this protected characteristic and will be monitored and evaluated over time.

GENDER REASSIGNMENT

Details of impacts identified	The Borough Plan has priorities to improve the quality of life for all residents, service users and members of staff, especially those that are in most need of additional support and assistance. However, whilst we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents. The development of Key Performance Indicators will highlight specific work related to this protected characteristic and will be monitored and evaluated over time.

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	The Borough Plan has priorities to improve the quality of life for all residents, service users and members of staff, especially those that are in most need of additional support and assistance. However, whilst we have set a high level of ambition we are also operating within a difficult financial context which may impact or limit what we are able to achieve and the support we can provide for residents. The development of Key Performance Indicators will highlight specific work related to this protected characteristic and will be monitored and evaluated over time.

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?

Yes. All engagement was with relevant stakeholders, including those that will be affected by the Plan. The broad spectrum of engagement ensured that as many voices as possible were captured, including from marginalised and minority groups, and this was achieved through a range of different methods and platforms. The responses have been used to identify the needs, concerns and ambitions of residents, and will be used to inform the Borough Plan and future council activity and service delivery.

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

N/A

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

N/A

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

A performance dashboard highlighting key performance indicators is being created. This will be continually reviewed to ensure that the ambitions of the Plan are monitored, reviewed, evaluated and delivered. The equality impact analysis document will be updated with the additional information.

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.

Overall, the Borough Plan should have a positive impact on our service users, residents and workforce. Our Performance Dashboard will enable efficient monitoring and evaluation of progress against key priorities going forward.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	**CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED**	**X**
B	**JUSTIFY AND CONTINUE THE POLICY/PROPOSAL**	
C	**CHANGE / ADJUST THE POLICY/PROPOSAL**	
D	**STOP OR ABANDON THE POLICY/PROPOSAL**	

SECTION E - ACTION PLAN

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

Action	Expected outcome	Officer	Completion Date
Update the EA document once KPIs have been defined	Efficient monitoring and evaluation of progress against key priorities		

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Tom Pickup 23.01.23

REVIEWING OFFICER:	Janet Latinwo 23.01.23
HEAD OF SERVICE / Operational Director:	Lorna Hughes 23.01.23

Brent	**Cabinet** 6th February 2023
	Report from the Director Regeneration, Growth and Employment

Sustainable Environment and Development Draft Supplementary Planning Document

Wards Affected:	All, but excluding parts of Alperton, Harlesden and Kensal Green, Stonebridge and Tokyngton where Old Oak and Park Royal Development Corporation is the Local Planning Authority
Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	One Appendix A: Sustainable Environment and Development Draft SPD
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Paul Lewin, Team Leader, Planning Policy 020 8937 6710 paul.lewin@brent.gov.uk

1.0 Purpose of the Report

1.1 The purpose of the report is to seek Cabinet approval for consultation on a Sustainable Environment and Development draft Supplementary Planning Document (SPD). Cabinet is also requested to delegate authority to the Strategic Director for Communities and Regeneration 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 final Sustainable Environment and Development SPD.

2.0 Recommendations

2.1 Cabinet approve consultation on a Sustainable Environment and Development draft Supplementary Planning Document (SPD) as set out in Appendix A.

2.2 Cabinet delegate authority to the Strategic Director for Communities and Regeneration 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 final SPD.

3.0 Detail

Climate Emergency

3.1 The Council in July 2019 declared a climate and ecological emergency and committed to 'do all reasonable in the council's gift to aim for carbon neutrality by 2030.' A subsequent Climate and Ecological Emergency Strategy (2021-2030) was developed. This established a framework for action to tackle climate change in the borough. It identified that tackling the climate and ecological emergency requires action across a number of different and complex environmental issues, ranging from: carbon reduction; water conservation, cleaner air, healthy and active travel, biodiversity loss, greener spaces, adapting to global heating, warm homes, reducing waste and growing the green and circular economy.

Planning Policy and Guidance

3.2 New development within the borough will clearly play a significant part in determining the extent to which many of these matters are properly addressed. Where development requires planning permission, the Council can ensure that the climate and ecological emergency are dealt with as best as possible. The recently adopted London Plan 2021 and Brent Local Plan 2019-2041 contain a number of policy requirements that tackle climate change factors. The mayor has also introduced a number of Supplementary Planning Guidance (SPG) and more recently London Plan Guidance (LPG) documents. These, and emerging draft LPGs provide further advice on how climate change policies can be addressed. The main focus of this guidance is major developments or those that are larger and specifically referable to the mayor.

3.3 At the local level, it is considered that it is now necessary to produce a document that provides clarity on how developments in Brent can address climate change factors, taking account of local policies. To simplify matters, this makes suitable reference to London Plan policies, SPGs and LPGs, as well as Brent Local Plan policies and SPDs. The guidance relates to both major and minor developments.

Sustainable Environment and Development Draft SPD

3.4 The Sustainable Environment and Development draft SPD addresses a number of subject themes. The draft SPD is set out in Appendix A. In overview, the themes are:

a) Air quality,
b) Green infrastructure,
c) Water management,

d) Energy,
e) Sustainable movement,
f) Waste management and the circular economy, and
g) Other environmental impacts, such as noise, odour, dust, vibration, light pollution and contamination.

3.5 For each theme it sets out:

a) Brent as existing and in the future,
b) Policies, guidance and tools,
c) Key policy considerations,
d) Assessments and mitigation measures,
e) Development Management planning requirements,
f) Planning conditions and obligations, and
g) Monitoring requirements.

3.6 There has been extensive engagement internally (development management, air quality, environmental health, parks, transport, waste management and climate change teams) and where necessary externally (Natural England) with relevant people and bodies to inform the content of the document. All are positive about the document and recognise its intention to address creating more sustainable development.

Options

3.7 There are essentially two options open to the Council:

a) Do not take forward a Sustainable Environment and Development draft SPD, or

b) Take forward a Sustainable Environment and Development draft SPD.

Do not take forward a Sustainable Environment and Development Draft SPD

3.8 In this scenario, the Council is likely to receive a number of planning applications for development that ultimately are unacceptable. This will need to be addressed prior to determination through additional material being submitted and associated extensions of time for the application to be determined with the applicant. Or alternatively the application can be refused and then re-submitted when all the additional material is available. This is because applicants might not understand the breadth of material needed to be supplied to address London Plan policies. There will also be no detailed advice to applicants on the Council's interpretation of its Local Plan policies. This may result in delay and confusion for the applicant. Lack of clarity over interpretation of policy could also lead to more appeals as applicants might challenge the Council's interpretation of policies used as reasons for refusal.

Take forward a Sustainable Environment and Development Draft SPD

3.9 In this scenario, once the SPD is adopted it is likely that the Council receive a higher proportion of planning applications for a better standard of developments that ultimately it can approve. This is because applicants might not understand the breadth of material needed to be supplied to address London Plan policies. There will also be no detailed advice to applicants on the Council's interpretation of its Local Plan policies. The SPD will identify all issues that applicants need to consider and address. Applicants therefore will be able to better understand the potential risk in submitting an application. This will reduce wasted resource from the applicant and Council as it is likely to result in fewer refusals and then re-submission to address refusal reasons. It will also reduce appeals, as Council's interpretation of policies used as reasons for refusal will be clear.

3.10 Taking account of the negative and positive impacts of the options, Option B is recommended, with the draft SPD as set out in Appendix A issued for consultation. Ultimately if adopted, the SPD will improve planning outcomes and reduce wasted resource. A consultation on the draft will allow suitable engagement which will encourage feedback on the document. This is likely to improve its quality in achieving its outcomes.

Consultation Process

3.11 Consultation on the document will be for a minimum of six weeks, consistent with regulations and the Council's Statement of Community Involvement. It will be advertised on the Council's website and notifications sent to statutory consultees and those on the Local Plan consultation list. The document will be made available in Brent Council libraries.

Post Consultation Process

3.12 Consistent with regulations the Council is required to consider all of the responses to the draft SPD received. These will be summarised, responded to and where appropriate recommended changes to the SPD will be made. This work will be contained within a Consultation Statement that will be made publicly available.

3.13 To reduce Cabinet business, it is recommended Cabinet delegate authority to the Strategic Director for Communities and Regeneration in association 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 final Sustainable Environment and Development SPD. This delegation is consistent with the approach taken for most of the Council's SPDs since 2015.

4.0 Financial Implications

4.1 The consultation and adoption of the Sustainable Environment and Development SPD is likely to be limited in its resource requirements, covering matters such as printing of consultation material and officer time. This expenditure has been accounted for in the existing planning policy budgets.

5.0 Legal Implications

5.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the processes that need to be followed by the Council in taking forward a SPD. The Council will follow these processes. Once adopted, the SPD will be a significant material consideration in the determination of planning applications.

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 The document has been subject to Equality Impact Assessment screening. For the Sustainable Environment and Development Draft SPD, on balance the implications are likely to overall be positive. This is particularly in relation to age (elderly for example through better energy efficiency of buildings, elderly and young through better access to public transport and green infrastructure/ open spaces) and those with a disability (though access to homes with better air quality).

7.0 Consultation with Ward Members and Stakeholders

7.1 Early versions of the document have been presented to the Local Plan Members' Working Group and the Cabinet Member for Regeneration and Planning and the Cabinet Member for Environment, Infrastructure and Climate Action. The document's formal consultation will be publicised in the members' bulletin.

Report sign off:

Alice Lester
Director of Regeneration, Growth and Employment

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Sustainable Environment & Development

Draft **Supplementary Planning Document**

February 2023

Brent

Planning Policy Team
Communities & Regeneration
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Brent Council www.brent.gov.uk

Executive Summary

The impact of human activities on the local environment and the planet is something that the council and Brent's community consider needs to be addressed. The council declared a climate emergency in 2019. It is taking action to address climate change as a priority. Wherever possible, it wants to ensure sustainable development occurs. The Brent Local Plan vision sets out the importance of implementing the planned growth in the borough sustainably. This is to protect the environment and the quality of life of local people.

This document is known as a supplementary planning document (SPD). It does not create new policy. It does, however, provide detailed guidance on how current planning policies will be applied to different types of development. It will be a material planning consideration for planning decisions. It sets out requirements for developments requiring planning permission. It also seeks to influence development where there is no council planning control. It addresses key planning considerations. This is to improve development's environmental sustainability.

High quality sustainable development requires adopting a holistic approach. The design and construction of new buildings and the spaces around them is important. It has a key role in delivering sustainable development.

The true benefits of sustainable environment and development go well beyond simply cutting carbon emissions. There are also associated economic and social benefits. These include reduced energy bills and improved quality of life, now and in the long-term.

In addition, recovery from the pandemic presents an opportunity for a long-term vision to tackle inequality in numerous elements of the built environment. It has brought forward the need to optimise healthy places and build back greener by addressing disparities in the existing built environment. Many of these features tie in with the themes addressed in this SPD.

This SPD provides details of how the council will address the environmental impacts of development. This will be achieved by accelerating the necessary reduction of carbon emissions. This will further enabled by associated improvements in air quality, through quality green and blue infrastructure, efficient and clean energy, sustainable travel, reduced environmental nuisances and waste management in the borough.

Consultation Statement

This draft Supplementary Planning Document (SPD) will be subject to a 6-week period of consultation. This will take place between X February and X April 2023. Consultation will be consistent with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement (SCI).

The document will be made available on the council's website, as well as in Brent Council libraries. The council will promote it through general awareness raising undertaken through media releases, its social media pages and on its website. In addition, the council will notify all relevant people and organisations on its planning policy consultation database. It will also make all landlords in the borough registered with it, aware of the consultation.

Representations on the document can be made to: planningstrategy@brent.gov.uk. Alternatively, you can write to: Paul Lewin, Team Leader Planning Policy, Brent Council, Civic Centre, Engineers Way, Wembley HA9 0FJ. Representations should be received by the council by midnight X April 2023. Please reference the appropriate section and paragraph of the document for each individual comment that you make. Please note that the council will not register anonymous responses. You should provide your name and if relevant, the organisation that you are working for, and that which you might be representing.

When reporting the consultation responses, organisation names will be referenced by the council. However, no individual's name or personal details of respondents will be made publicly available. Please can you indicate with your response whether you wish to be informed by the council of whether this document is adopted. Please also indicate if you would like to be informed of other planning policy consultations by having your details put on our planning policy consultation database. This information will only be used in relation to consultations on the council's planning and associated documents. Unless you indicate that you want to be put on this database, your personal details will only be kept until the council makes a decision on whether to proceed with the adoption of the SPD or not and has subsequently issued the appropriate notifications. Please see our privacy policy for more details.

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1. Introduction

1.1 Overview

1.1.1 The 1992 Earth Summit was the first international acknowledgement of the threat of climate change by global governments. It also linked this to the unsustainable and inequitable environmental, social and economic nature of a lot of human activities. It resulted in the United Nation's (UN) 2030 Agenda for Sustainable Development, the historic Paris Agreement in 2015 and COP26 Glasgow in 2021. At the core of the 17 Sustainable Goals was Good Health and Wellbeing; Affordable and Clean Energy; Sustainable Cities and Communities; Responsible Consumption and Production; Climate Action; Life below Water; Life on Land; Tackling Climate Change and Partnerships for the Goals. The Paris Agreement is a legally binding international treaty on climate change. Its goal is to limit global warming compared to pre-industrial levels to well below 2 and preferably to 1.5 degrees Celsius. COP26 mandated countries to provide their national action plans and updates on progress since Paris.

1.1.2 The UK government declared a Climate Emergency in 2019. It set out the ambition to become a net zero country by 2050. The majority of local councils have also declared a 'Climate and Ecological Emergency'. They set out priorities to mitigate climate change and attain zero carbon targets. Many committed to much more ambitious timescales than the 2050 target. The Mayor of London set out London's ambition to lead the way, becoming a net zero city by 2030.

1.1.3 Sustainable development is a core principle underpinning planning in the National Planning Policy Framework (NPPF). The objective purpose is to guide development towards sustainability while identifying local circumstances, needs and opportunities. It should align growth with infrastructure to improve the environment and adapt to the effects of climate change. This is reflected in the London Plan policies. It takes a holistic approach to sustainability and sets out the strategic requirements for development.

1.1.4 To align with the strategic sustainability principles, Brent Council has adopted a very proactive approach. This is through various strategies and planning documents taking us towards carbon neutrality.

1.2 The Council's Approach to Sustainability

1.2.1 Brent Council declared a Climate Emergency in 2019, committing to carbon neutrality by 2030. The resulting Brent Climate and Ecological Emergency Strategy 2021-2030 (BCEES) sets out the local context and key actions at the forefront of tackling climate change. Within the 2021-22 Delivery Plan, the Climate Adaptation and Resilience Plan provides a framework. It identifies feasible infrastructure measures to be addressed in yearly delivery plans.

1.2.2 The Brent Local Plan 2019-2041 sets out the borough's future development strategy. Its policies align with the BCESS priorities. Crosscutting, it addresses various climate change aspects.

1.2.3 The Local Plan aims to provide a resilient borough. This will be achieved through balancing future development alongside meeting national sustainability objectives. This will reduce exposure and vulnerability to climate hazards, cut back greenhouse gas emissions, integrate sustainable transport, initiate the circular economy and conserve and expand the natural environment.

1.2.4 This SPD sets out ways to ensure sustainable development is achieved. It focuses on the explanation of relevant Local Plan policies, technical standards and their implementation. It covers seven key topics.

1.2.5 Achieving high quality places and conserving the historic environment of Brent is fundamental to the council. In addition to the National Design Guide (2019) and Building for a Healthy Life (2020), other local guidance related to design include the Brent Design Guide SPD1, Residential Extensions and Alterations Design Guide SPD2, Shopfronts SPD3, Basements SPD, and emerging Residential Amenity Space and Place Quality SPD. The respective conservation area design guides provide information on how to preserve and enhance the character of each area.

1.2.6 The council encourages the use of construction standards to demonstrate excellence in sustainable development. Developers should use the latest version of Code of Construction Practice and Code of Considerate Practice.

1.3 Purpose of this Document

1.3.1 This SPD is part of the council's approach to ensuring collectively that new development in Brent is environmentally sustainable. It addresses technical standards and relevant assessments needed to limit greenhouse gas emissions.

1.3.2 Its purpose is to help residents, business owners, developers and planners ensure that development proposals improve Brent's environmental performance. Following this guidance will contribute to helping meet the BCESS's targets and ambitions.

1.3.3 This SPD particularly expands on air pollution, natural environment, energy efficiency and waste policies – key climate change considerations. The guidance provides a consistent approach on the implementation of the Local Plan sustainable development and natural environment policies. It highlights key considerations during the planning process for planning applications. Policies include:

- Policy DMP1 Development Management General Policy
- Policy BGI1 Green and Blue Infrastructure in Brent
- Policy BGI2 Trees and Woodlands
- Policy BSUI1 Creating A Resilient and Efficient Brent
- Policy BSUI2 Air Quality
- Policy BSUI3 Managing Flood Risk
- Policy BSUI4 On-Site Water Management and Surface Water Attenuation
- Policy BT1 Sustainable Travel Choice
- Policy BT2 Parking and Car Free Development
- Policy BT3 Freight and Servicing

1.3.4 This SPD will be a material consideration in the determination of planning applications. The SPD does not introduce new standards that contradict the policies in the Local Plan. It does, however, add value by including further detail and guidance on how to apply current policy and demonstrate excellence in sustainable development. Sustainability measures need to be incorporated early into the planning process.

1.3.5 The SPD will ideally also encourage wider adoption of its recommended approaches where planning permission is not required (permitted development rights, householder applications, retrofit and refurbishment).

1.4 Structure of the Document

1.4.1 **Introduction Chapter** – a council-wide approach to climate change and sustainability introducing key theme topics.

1.4.2 **Theme Chapters** - a topic-by-topic breakdown of the key Brent built and natural environment sustainability issues. Each topic's structure comprises:

- Brent as existing and future;
- Policies, guidance and tools;
- Key policy considerations;
- Assessments and mitigation measures;
- Development Management planning requirements;
- Planning conditions and obligations; and
- Monitoring requirements.

1.4.3 **Sustainability Checklist** - briefly addresses how all proposals should comply with relevant criteria in each theme chapter. It signposts to other appropriate statements/strategies. It will need to be submitted with all development applications.

1.5 Sustainability Through Standards

1.5.1 The council determines proposals by using leading assessment methods and rating systems. For sustainability purposes, these often go beyond the Building Regulations. The Building Research Establishment (BRE) sets outs a suite of recognised certification systems. These represent a broad range of categories and criteria, from energy to ecology. Benchmarks are used to evaluate a building's or place's specification, design, construction and use.

1.5.2 For the environmental performance of non-residential buildings, the Building Research Establishment Environmental Assessment Method (BREEAM) can be used. For residential, the council encourages the use of the Home Quality Mark (HQM). Both sets of standards cover a broad range of sustainability issues beyond the Building Regulations including net zero carbon, whole life performance, health and wellbeing, social impact, outdoors, biodiversity, circularity, resilience, quality assurance, disclosure and reporting.

1.5.3 The Building Regulations and BREEAM or HQM should be considered before progressing detailed design. This will achieve the best performance, in the most economic manner.

1.5.4 In addition to the above, the council also encourages achieving Passivhaus standards of high levels of insulation and air tightness, aligned with appropriate ventilation.

1.5.5 Verification of each standard will require accredited assessors or specialist consultants. Their early engagement will result in the most effective cost and environmentally sustainable outcomes.

1.6 Demonstrating Environmental Sustainability in Planning

1.6.1 Planning applications should be supported by evidence to demonstrate how they meet this SPD's requirements to achieve the highest level of environmental sustainability performance. These are set out in the respective themed chapters (see **Section 1.7**).

1.6.2 Some assessments may require a greater level of information to be available as the development proceeds from its initial design to implementation. Pre-applications for major developments should be accompanied with pre-assessments when full assessments cannot be completed. This will better ensure a development can reach the necessary standard.

1.6.3 Due to the lower level of information contained in an outline planning application, it may not be possible to complete assessments that demonstrate reaching the necessary standards. Planning conditions will be used to secure the completion of assessments demonstrating the potential to reach the necessary standard to support the reserved matters applications and subsequent stages. To meet standards, it is important that applicants carry out any pre-assessment necessary at the outset to avoid difficulties as the scheme evolves.

1.6.4 Other applications will be expected to demonstrate compliance with this SPD through the Design and Assess Statement and, where necessary, through other dedicated statements.

1.7 Outline of Key Themes

1.7.1 The seven themes covered in the SPD include:

Chapter 2. Air Quality

Chapter 3. Green Infrastructure

Chapter 4. Water Management

Chapter 5. Sustainable Movement

Chapter 6. Energy

Chapter 7. Waste & Circular Economy

Chapter 8. Other Environmental Impacts

Chapter 2. Air Quality

Air pollution can arise from many sources and activities, including transport, industrial processes, domestic and commercial premises, energy generation, agriculture, waste storage/treatment and construction sites. Every new development will need to consider its air quality impact. This includes consideration of emissions generated by the development from buildings or associated activities, construction activities and transport movements. New developments in Brent are required to minimise exposure to pollution and provide solutions to improve local air quality. Consideration of air quality in the development design will lead to meeting the air quality standards and an improved environment. Good design at the outset is the most effective and straightforward way to a low/zero emission development.

Chapter 3. Green Infrastructure

New developments play a key role in delivering new and improving existing green spaces across Brent. Green infrastructure refers to ecological systems, both natural and man-made. It includes parks, trees, allotments, green corridors, landscape, permeable pavements, green roofs, green walls, rain gardens and ecology. Well-designed green infrastructure has the potential to offer multifunctional benefits including reduced air pollution; carbon storage; sustainable drainage; habitat for biodiversity; health and recreational benefits and the creation of visually pleasing spaces. The extent to which it provides these benefits depends on how it is designed and maintained. Emphasis should be placed on ensuring that it functions in a way that meets the specific needs of the intended users.

Chapter 4. Water Management

Water management is the planning of water, in terms of both water quality and quantity. This includes:

- **Managing water efficiently:** London has a finite supply of water, increasingly adversely affected by climate change. To ensure future supply, new developments need to be designed for optimal water consumption. This will also need integration of water reuse;
- **Minimising damage to life and property:** urbanisation and extreme rainfall events with climate change make flood risk more common. New developments need to manage the impact of flooding and not increase flood risk elsewhere; and
- **Maximising blue infrastructure benefits:** Brent has various water bodies. Schemes should contribute to and enhance the natural and local environment by recognising the wider benefits of adjacent blue infrastructure.

Chapter 5. Sustainable Movement

Embedding sustainable movement in schemes is a significant planning consideration in Brent. Movement links should be accessible, safe and visually appealing. Development must connect to the surrounding existing active travel routes or public transport. In addition, the layout of the scheme should integrate with the surrounding community facilities, ensuring that local amenities are accessible by modes of active travel (walking and cycling).

Chapter 6. Energy

Building design has an important role to play in supporting the transition to a carbon neutral Brent. The council aims to reduce the total carbon emissions from the development with sustainable energy measures on-site. Developers should aim to reduce energy demand, utilise energy efficiently, supply energy more efficiently and incorporate renewable technology.

Chapter 7. Waste & Circular Economy

Waste management is a circular approach that requires all type of waste recycling to be planned for in Brent. In the designing of buildings, it means considering the impact of the development across its whole lifecycle e.g. from inception of design through to procurement, construction, operation, maintenance and to end of life recycling. At every stage, actions minimising a development's environmental burden should be undertaken and planned for. Buildings should be designed for longevity, with ease of adaptability to meet future changing needs. Opportunities to reduce and recycle should be considered from the outset to facilitate a zero carbon footprint. This is both from construction material and by building users throughout the development's lifespan.

Chapter 8. Other Environmental Impacts

There are many other environmental impacts that negatively affect the local environment that also need to be managed. Examples include noise, odour, light pollution, ventilation, vibration and potential contamination. Development proposals need to carefully consider these, ensuring acceptable land use activities in appropriate locations.

1.8 Approach to Retrofit and Refurbishment

1.8.1 Retrofit and refurbishment imply a process of improvement. Retrofit is the introduction of new materials, products and technology into an existing building. It can include energy saving solutions such as new heating system, renewable energy, preventing overheating, irrigation, insulation, glazing, ventilation or building management system. Refurbishment is improvement of existing by re-decorating or re-equipping. It can include double or triple glazing, draught proofing, lighting control, cavity wall insulation, voltage optimisation, water reuse, new equipment and appliances.

1.8.2 Existing homes and buildings provide a prime opportunity to deliver sustainable cuts in carbon emissions, environmental impact and operational costs. The BCEES recognises the vital issue of the council addressing the existing building stock during climate adaptation and resilience planning. The strategy identifies work streams and pilot projects around retrofit.

1.8.3 However, given the relationship to the sustainable built environment, it is thought relevant to outline key guidance in this document. The following references expand on retrofit that applicants and planners may refer to:

- Climate Emergency Retrofit Guide, LETI, Passivhaus Trust, RIBA, UKGBC, CIBSE and AECB
- Net Zero Estate Playbook: A guide to decarbonising government property 2021, Government Property Function
- Retrofit Internal Wall Insulation Guide to Best Practice 2021, BEIS
- Retrofit London Housing Action Plan 2021, London Councils
- Retrofit for the Future Guide 2014, BEIS: Technology Strategy Board

1.9 Behaviour Change and Incentives

1.9.1 An environmentally sustainable future will require both public and private sector intervention and behaviour change. This will be from all those who live, work, invest in, and visit Brent. It requires people to reduce energy use, invest in new energy technology, rethink water consumption, protect wildlife and ecosystems, switch to clean transport and recycle waste.

1.9.2 Numerous factors can affect an individual's efforts and require adjustment in changing long-term habits. These can be psychological, social, cultural, financial or structural.

1.9.3 For planning to drive behaviour change, there also needs to be some non-monetary incentive. This can include, but not be limited to:

- Smoother planning processing;
- Training or workshops with officers and industry;
- Recognition of exemplar schemes on the council's website;
- Marketing and publicity via awards;
- Certification schemes e.g. eco labels (BREEAM, BRE, LEED, Passivhaus, WELL-label);
- Long-term economic viability (reduced operational cost and maintenance);[1] and
- Growing public demand for a sustainable built environment in which people want to live, work and spend time.[2]

1.10 Types of Development

1.10.1 This SPD focuses on new developments and refers to the following types:

- **Major development:** Provision of 10 dwellings or more and a floor space of over 1,000sqm;
- **Minor development:** Provision of 1-9 dwellings and floor space less than 1,000sqm;
- **Change of use:** A type of minor development where no major building or engineering work is involved and the intention is only to change the existing use class;
- **Permitted development:** A type of development that does not require the council to grant planning permission. The council however encourages individuals carrying out permitted development to address adverse environmental impacts.

1.10.2 Development in conservation areas or affecting listed buildings will be assessed on a case-by-case basis and in line with the respective design guides. Minor householder development involving extensions or alterations is also encouraged to address adverse environmental impacts.

2. Air Quality

2.1 Air Quality in Brent

2.1.1 The majority of Brent has been designated as an Air Quality Management Area (AQMA). This is due to exceedances in national air quality targets, specifically for Nitrogen Dioxide (NO2) and Particulate Matter (PM10).

2.1.2 The Greater London Authority (GLA) has identified a number of Air Quality Focus Areas (AQFAs) in Brent. The council has also identified a number of 'hotspots'. This list is subject to occasional review. When updated, the new boundaries will be shown on the council's interactive Local Plan Policies Map.

2.1.3 The largest contributors to poor air quality in Brent for NOx and PM emissions are road transport, local energy generation, industrial processes, commercial cooking and construction. New development has a significant role to play in reducing this pollution.

2.1.4 Key actions in Brent's Air Quality Action Plan aim to address this. New development actions are:

- **Reduce building emissions**: Reduce construction emissions, prioritise clean energy in buildings, deliver AQ neutral and positive development, improve existing poor performing buildings and waste reduction;
- **Reduce transport emissions:** Provide for walking and cycling infrastructure, discourage engine idling, shift to low emission vehicles, installation of Ultra Low Emission Vehicle (ULEV) infrastructure, shift to low emission deliveries and council fleet; and
- **Improve green infrastructure:** Provide green barriers and tree planting to reduce exposure to pollution and reduce need for mechanical building cooling.

2.2 Policy Overview

National Policy & Guidance
Air Quality (England) (Amendment) Regulations 2002
Environment Act 2021
National Planning Policy Framework, Para 181
Planning Practice Guidance Air Quality
Department for Environment, Food & Rural Affairs (Defra) Clean Air Strategy

London Plan Policy & Guidance
London Plan Policy SI 1 Improving air quality
London Plan Policy D13 Agent of Change
Code of Construction Practice 2022
London Local Air Quality Management (LLAQM) framework
The London Environment Strategy
Mayor of London LPG Air Quality Neutral 2022 (draft)
Mayor of London LPG Air Quality Positive 2022 (draft)
The Control of Dust and Emissions during Construction and Demolition SPG
Non-Road Mobile Machinery (NRMM) emissions standards
School and nursery air quality audits
Mayor's Air Quality Fund (MAQF)
Air Quality Planning Toolkit for London Boroughs

Local Plan Policy & Guidance
Brent Local Plan Policy BSUI2 Air Quality
Brent Air Quality Action Plan 2017-2022
Air quality annual status report 2021

2.2.1 Air pollution poses the biggest public health environmental risk. The Environment Act 2021 sets out to achieve air-quality targets. Presently key concerning pollutants are nitrogen dioxide (NO2) and Particulate Matter (PM2.5 and PM10). PM2.5 provides greatest human health harm.

2.2.2 The Air Quality (England) (Amendment) Regulations 2002, provides the statutory basis for the national air quality objectives. The GLA has taken these forward through the Local Air Quality Management (LLAQM) Guidance for London. This sets out to achieve an annual average PM2.5 concentrations target of 10 micrograms per cubic metre ($\mu g/m^3$) by 2030. This is an accelerated approach compared to the Environment Act 2021 target of 2040.

2.2.3 The LLAQM system is a statutory process. Local authorities monitor, assess and take action to improve local air quality. In areas of non-compliance with air quality objectives, an Air Quality Management Area (AQMA) is declared.

2.2.4 Within the AQMAs, the GLA identified air pollution hotspots known as Air Quality Focus Areas (AQFAs). AQFAs are locations with high human exposure with significant exceedance of national air quality objectives.

2.2.5 To guide development in AQMA and AQFAs, in line with the London Plan, the Local Plan has adopted an air quality neutral and positive approach. It also contains many policies that indirectly seek to improve air quality such as sustainable energy, sustainable travel and open spaces.

2.2.6 A good air quality approach makes an active contribution to improving air quality in and around a development site. It also minimises exposure of its occupiers to existing sources of poor air quality. This will require improvements in vehicle technology, sustainable modes of transport improved building standards and construction management.

2.3 Key Policy Consideration: Air Quality Neutral

2.3.1 London Plan Policy SI 1 and Local Plan Policy BSUI2 require all new developments to be Air Quality Neutral (AQN). An AQN development meets, or improves upon, the benchmark emissions set out in the draft Air Quality Neutral LPG. These baseline benchmarks are set out in **Table 1** and may be subject to updates as per the LPG.

2.3.2 There are two sets of benchmarks from two main sources of air pollution from new developments:

- **Building Emissions Benchmark (BEB):** emissions from equipment used to supply heat and energy to the buildings; and
- **Transport Emissions Benchmark (TEB):** emissions from vehicles travelling to and from the development.

Land uses	Building Emissions Benchmarks (BEB) (gNOx/sqm/annum)				Transport Emissions Benchmark (TEB) for outer London sqm (GIA)
	Individual gas boilers	Gas Boiler Network	CHP + Gas Boiler Network	Heat pumps + Gas boiler network	
Residential (including student accommodation and large-scale purpose-built shared living development)	3.5	5.7	7.8	5.7	447
Office / Light industrial	1.43	2.62	11.63	2.62	16
Retail (Superstore)	0.53	0.97	4.31	0.97	216
Retail (Convenience)	0.53	0.97	4.31	0.97	274
Restaurant/Café/Bar	1.76	3.23	14.344	3.23	170
Hot food takeaway	-	-	-	-	590
Industrial	1.07	1.95	8.73	1.95	16.3
Storage and distribution	0.55	1.01	4.50	1.01	5.8
Hotels	9.47	15.42	38.16	15.42	6.9
Care homes and hospitals	9.15	14.90	36.86	14.90	19.5
Schools, nurseries, doctor surgeries, other non-residential institutions	0.90	1.66	7.39	1.66	44.4
Assembly and leisure	2.62	4.84	21.53	4.84	47.2
Non-combustion heat sources: electric panel heaters, heat pumps	Zero				-
Solid or liquid biomass	Zero				-

Table 1: Air Quality Neutral building and transport emissions benchmarks

2.3.3 **BEB:** The benchmarks for BEB are set out as the maximum allowable emission rates of nitrogen oxide (NOx) and particulate matter (PM). It is defined in grams (g) of nitrogen oxides (NOx) emitted per square metre (sqm) of floorspace (GIA) over a year (gNOx/sqm/annum).

2.3.4 The NOx BEB benchmarks are based on the type of energy technology used. This relates to the development's size and use class as shown in **Table 1**. However, these are dependent on the characteristics of the energy strategy adopted. Where these are different, the draft Air Quality Neutral LPG provides the following steps to confirm the predicted emissions of the development:

Where **annual energy use** (MWh/year) and **emission rate** (mg/kWh) are already calculated. Follow the steps below:

Step 1: Locate calculation on the proposed energy sources (gNOx/sqm/year) in the Energy Assessment

Where **annual energy use** (MWh/year) and **emission rate** (mg/kWh) is **not** calculated. Follow the steps below:

Step 1: Locate information on energy use and emission rate for each combustion source in the Energy Assessment or Air Quality Assessment (AQA)

Step 2: A consultant will need to provide total predicted annual energy usage (MWh/year)* for each source.

**The energy sources identified may be grid electricity, gas boilers (communal/individual), gas CHP, connection to existing district heat network, other gas uses such as cookers*

Step 3: Identify information on the predicted emission rates (mg/kWh) for each source. This is often included in manufacturer's specs*. Where specific unit installation has not been decided, the generic emission rates identified in draft LPG AQN Table 3.5 can be used.

**The generic emission rates for combustion technology for gas boilers (40 mg/kWh), for gas engines with SCR (25 mg/Nm^3), for heat pumps (zero)*

Step 4: Multiply energy use for each source with emission rate for each source

Step 5: Add all emissions to get total predicted building emissions (kg)

Step 6: To compare if the predicted building emissions meets the allowable BEB in **Table 1**, follow the next steps

Step 7: Multiply the GIA (sqm) for each proposed land use by the corresponding benchmark NOx emission rate (gNOx/sqm/year) in **Table 1**

Step 8: Add together all emissions for each land use to get total benchmark emissions (kg)

Step 9: Add together all emissions for each land use to get total benchmark emissions (kg)

Step 10: The development will be considered Air Quality Neutral in terms of building emissions if the total predicted building emissions (**Step 5**) are less than the benchmark emissions (**Step 8**)

Step 11: Include calculation summary table in the AQA

Step 12: Submit with planning application. In case of pre-application, submit a draft calculation summary with the preliminary AQA

Table 2: Total predicted building emissions calculation (gNOx/sqm/annum)

2.3.5 **TEB:** The benchmarks for TEB for non-residential use are set out as the predicted number of trips per sqm of floorspace (GIA) over a year (trips/sqm/year). The TEB for residential are anticipated number of trips per dwelling (trips/dwelling/year).

2.3.6 The TEB benchmarks are based on the generated car or light van trips defined for different land uses and areas in London as shown in **Table 1**.[3] However, these are dependent on the characteristics of the transport strategy adopted. Where these are different, the draft Air Quality Neutral LPG provides the following steps to confirm the predicted emissions:

Step 1. Locate information on proposed energy sources in the Transport Strategy*

**where peak hour trips are considered, full number of predicted trips covering daily and annual rates will be suggested.*

↓

Step 2. Multiply the number of dwellings (residential) or GIA (non-residential) for each land use is by the benchmark trip rate in **Table 1**

↓

Step 3. Add together all emissions for each land use in the development proposal to get total TEB

↓

Step 4. Include calculation summary table in the AQA

↓

Step 5. Submit with planning application. In case of pre-application, submit a draft calculation summary with the preliminary AQA

↓

Step 6. The development will be considered Air Quality Neutral in terms of transport emissions if the total if the total trip rate is less than or equal to the TEB in **Table 1**

Table 3: Total transport emissions calculation

2.3.7 A development must meet both benchmarks separately on-site. If the AQA shows it does not do this, the priority is to amend the proposal so it does. If development is unable to achieve this, the council will secure off-site mitigation measures within the borough. This will be based on the Defra damage cost toolkit completed by the developer.

2.3.8 In some cases, due to the nature or location of the proposed scheme, minor developments will be required to demonstrate meeting AQN benchmarks in in a full AQA. In most cases it will however be in the Design & Access Statement.

2.4 Key Policy Consideration: Air Quality Positive

2.4.1 London Plan Policy SI 1 and Local Plan Policy BSUI2 require all new major developments in AQFA and the borough's Growth Areas to be Air Quality Positive (AQP). This includes development with large numbers of people particularly with and/or near sensitive users and uses.

2.4.2 A development must exceed minimum benchmarks in meeting both BEB and TEB to create a positive impact. The draft Air Quality Positive LPG sets out opportunities available and measures on how to deliver this. To achieve compliance, AQP considerations will have to inform a development's design at a very early stage. This will reduce revisions during the planning application process.

2.4.3 In and around it, AQP development maximises local air quality benefits. It also minimises exposure to existing sources of poor air quality. An AQP Statement should set this out, using the draft LPG's AQP Matrix template, outlining how the proposed measures will be delivered. It should signpost the various strategies that have informed the development's design including:

- Building emissions;
- Transport emissions;
- Green Infrastructure; and
- Design and futureproofing.

2.4.4 If the AQA shows the development is not AQP, the priority is to amend the proposal so it is. If not possible, the council will secure off-site mitigation measures exceeding the relevant London Plan Policy minimum requirements.

2.5 Planning to Mitigate Air Quality

2.5.1 Planning applications may affect air quality in Brent or give rise to new exposure to poor air quality. Where this is the case, the council will have regard to policies in the NPPF, London Plan and Local Plan. Other guidance includes LPGs, the AQAPs and this SPD.

2.5.2 Developments should seek to control and improve air pollution by meeting the prescribed emissions benchmark. The significance given to air quality in making a planning application decision will depend on factors including the development's:

- Location;
- Type;
- Sensitivity of use e.g. hospital, school, nurseries, adult care homes, parks, GP surgeries;
- Sensitivity of receptors in the surrounding area at risk of increased pollution exposure;
- Surrounding area's air quality;
- Detailed calculations of the BEB, TEB and future scenario, and
- Mitigation reaching required levels.

2.5.3 The likely air quality impacts should be considered very early on in the development's design process. Calculations against the benchmarks should inform the design evolution and also be set out in an AQA.

2.5.4 An AQA should be submitted for all major planning applications. In certain cases, minor developments will require a full AQA. The AQA's detail (see **para 2.5.7**) will depend on the development type proposed. This includes the following:

- Major or minor development in AQMAs, AQFAs or Growth Areas;
- Major development subject to pre-application (should be accompanied with a preliminary AQA);
- Development including or near to a sensitive use (hospital, school, nurseries, adult care homes, parks);
- Development including installations of CHPs or large communal boilers, combustion or biomass based technologies;
- Development including stand-by/short-term power generation units regulated by the Environment Agency;
- Development creating long-term odour, dust, smoke, emissions and other fumes;
- Development interfering with the council's Air Quality Action Plan;
- Distribution, car, coach or lorry parks;
- Long-term construction sites over a period of a year or more;
- Development creating additional HGV movements; and
- Minor development including a new heating system.

2.5.5 In the case of minor development, this can be addressed in a simplified way in the Design & Access Statement.

2.5.6 These documents should signpost the application's design measures, energy strategy, transport strategy and green infrastructure strategy. Defra's Technical Guidance on AQAs, tools and good practice should be adhered to. Where specific details are not available at the application stage, indicative values may be used given final values inform the final AQA. However, it is recommended that developers should engage with an air quality consultant early on in the design process.

2.5.7 The following information should be included as part of assessments:

- Relevant national, regional and local policy compliance;
- The assessment methodology adopted including:
    - Baseline conditions;
    - Modelling tools;
    - Input data sources;
    - Relevant receptors; and
    - Assumptions (e.g. street canyon);
- Air quality impacts with and without the proposed development;
- Use of recognised and validated dispersion models;
- Long and short-term air quality impacts against standards;
- The impact of ambient air quality on the development's users;
- Acceptable mitigation measures to reduce or remove adverse impacts;
- Measures that could deliver improved air quality even when legally binding limits for air pollutants are not being breached; and
- Construction phase impacts.

2.5.8 Other assessments that may be required include the following (see **Section 8**):

- A **Dust Monitoring Plan** must be submitted for approval. This must be in accordance with the GLA's Control of Dust and Emissions during Construction and Demolition SPG. It must set out implementation measures to reduce the construction phase impacts;
- A **Demolition and Construction Management Plan** submitted and approved prior to any start on site to include: a Demolition and Construction Method Statement, a Demolition and Construction Traffic Management Plan and a Demolition and Construction Waste Management Plan;
- A **Ventilation Strategy and Extraction Statement** submitted prior to the occupation of any part of the development.

Mitigation Measures

2.5.9 Applicants are encouraged to propose innovative mitigation measures to actively improve air quality or reduce current exposures. These can include the following non-exhaustive list.

2.5.10 **Major Developments**

- Incorporate Healthy Streets indicators;
- Maintain suitable separation distances between air pollution sources and receptors, especially for sensitive land uses and public realm;
- Enhance biodiversity such as trees and hedges as screening, where this can create a barrier or maintain separation between sources of pollution and receptors;
- Provision of food growing opportunities to decrease travel;
- Adopt heat and energy generation technologies from efficient and/or renewable sources;
- Use appropriate filtration with placement of ventilation systems air inlets away from poor air quality sources and outlets away from recreation spaces;
- Locate exhaust vents and flues away from recreation spaces;
- Use design to ensure that street canyons, restricting dispersion of road traffic emissions, are not formed or made worse;
- Include infrastructure to promote low air quality impact transport modes (such as electric vehicle charging points);
- Adopt Code of Construction Practice and control dust and emissions from construction, operation and demolition; and
- Encourage pedestrian and cycle routes away from busy roads and reduce severance.

2.5.11 **Minor Developments**

- Use green infrastructure between sources of pollution and receptors;
- Adopt technologies efficient and/or renewable sources to generate heat and energy;
- Car free, clean transport and active travel infrastructure; and
- Control construction, operation and demolition dust and emissions.

2.6 Development Management

2.6.1 The following section aims to provide a clear and consistent approach for stakeholders to follow when assessing a development's potential air quality implications. At each planning application stage, the following will be required:

- **Phased development:** Each phase should demonstrate compliance with the relevant policy considerations. AQA including calculations for the whole development and additional tables showing calculations for all phases (see Appendix 2 of the draft Air Quality Neutral LPG).

- **Outline applications:** AQA including an Implementation Plan explaining how the detailed design and application stage will secure the AQP approach. Planning conditions, securing Reserved Matters application revision assessments for changes in layout and the design, use class, transport or energy strategy.

- **Pre-applications:** Preliminary AQA and calculations.

- **Full applications:** AQA, Air Quality Positive Statement, Dust Management Plan, Demolition and Construction Management Plan, Ventilation Strategy and Extraction Statement.

2.6.2 The planning requirements listed in tables below are based on the type of proposed development. It sets out requirements for:

Major Development | **Minor Development**

Change of use | **Permitted Development**

Major Development

A In an Air Quality Focus Area should be Air Quality Positive;

B In a Growth Area should be Air Quality Positive;

C Subject to an Environmental Impact Assessment must be Air Quality Positive; or

D Otherwise, be Air Quality Neutral.

Minor Development

E All must be Air Quality Neutral.

Change of Use

F Those emitting odours, dust, smoke, and other fumes must be Air Quality Neutral.

Permitted Development

G With emission sources such as permitted installations and industrial processes. Where required in the General Permitted Development Order 2015 (as amended), and/or covered by other environmental regulations will need to submit a detailed Air Quality Impact Assessment;

H Prior approval may be required if there are any transport or highways, noise and contamination impacts.

2.7 Planning Conditions and Obligations

2.7.1 Measures required to achieve AQN and AQP, where necessary, will be secured through planning conditions. Conditions may take a number of forms depending on the nature of the development. They may cover the air quality impacts of both the construction and operational phase.

2.7.2 The council will not permit a development that defers initial submission of an AQA via a planning condition. This is because air quality might not be sufficiently considered as part of the design process. As such, a subsequent AQA may identify unviable measures to mitigate impacts on or even off-site. Any mitigation measures identified in an AQA will, where necessary, be secured via condition or for financial contributions, through a Section 106 planning obligations.

2.7.3 In some cases, it may not be possible to identify appropriate and adequate on-site mitigation measures. Here, the council will agree an offsetting payment as set out in the council's Planning Obligations SPD. The damage cost per tonne of excess emissions should use the most up to date version of the Defra-published damage costs for air pollution. Section 106 and Section 278 agreements can be used to secure financial measures where appropriate.

Planning Conditions

I **Design phase:**

- On-site measures outlined in an AQA in cases where the design of the scheme is evolving;
- Off-site implementation of the measures will be secured where development proposal does not meet the benchmarks on-site;
- Details of emission sources included in development e.g. combustion plant or maximum permitted car parking spaces;
- Limiting the operation hours of emergency backup generators;
- Heating plant servicing and maintenance requirement; and
- Where indicative values are used at the application stage, a requirement for final values.

J **Construction phase:**

- Required to meet the emissions standards of the NRMM Low Emission Zone;
- Required to meet the Demolition Management Plan and Construction Plan;
- Implementation of mitigation measures for dust, such as an Air Quality and Dust Management Plan;
- Restrictions on certain types of construction vehicle emissions;
- Provisions for transporting waste or materials to and from development sites; and
- Real-time dust monitoring.

K **Operational phase:**

- Provision of a Low Emission Strategy;
- On-site parking provision restrictions;
- Alternative transport provisions, such as car clubs;
- Emissions testing; and
- Travel plans.

2.8 Monitoring Requirements

2.8.1 The need to monitor PM10 or PM2.5 and NO2 will need to be addressed in the AQA determined on a case-by-case basis. Monitoring will generally depend on existing air quality, the development's air pollution risks, technical practicalities and financial implications.

2.8.2 The requirements are to be agreed with the council's Environmental Monitoring Team prior to monitoring taking place. The Code of Construction Practice 2022 and Control of Dust and Emissions during Construction and Demolition SPG provides further monitoring guidance. The SPG splits monitoring recommendations into low, medium and high-risk sites (Chapter 6, Pages 52-54 and Appendix 8, Page 94).

2.8.3 Development will where appropriate in most cases, be expected to undertake the post-installation monitoring of emissions. This is to help understand how the development is performing in real life. It can also address the potential for a performance gap between anticipated air quality improvements and post-construction performance. In some cases, this will be used to inform financial contributions to off-site mitigation measures. It can also inform future policy development. Monitoring may be required either as a condition or planning obligation.

2.8.4 The BRE offer a post-occupancy evaluation. This can measure, among other things, air quality, allowing for comparisons to be made with both the original design specification, and relevant health-related and environmental standards.

Monitoring

L All demolition and construction sites will be required to monitor air-pollution generation;

M Some developments may be required to monitor post construction performance of the air quality mitigation measures;

N Exposure assessment may be required;

O Emissions tests will be required to ensure that the modelled emission parameters are achieved, with post construction correction if necessary; and

P Monitoring of dust, including PM10, will be required for a reasonable period before, during and after the works. For smaller sites this can be simply visual monitoring.

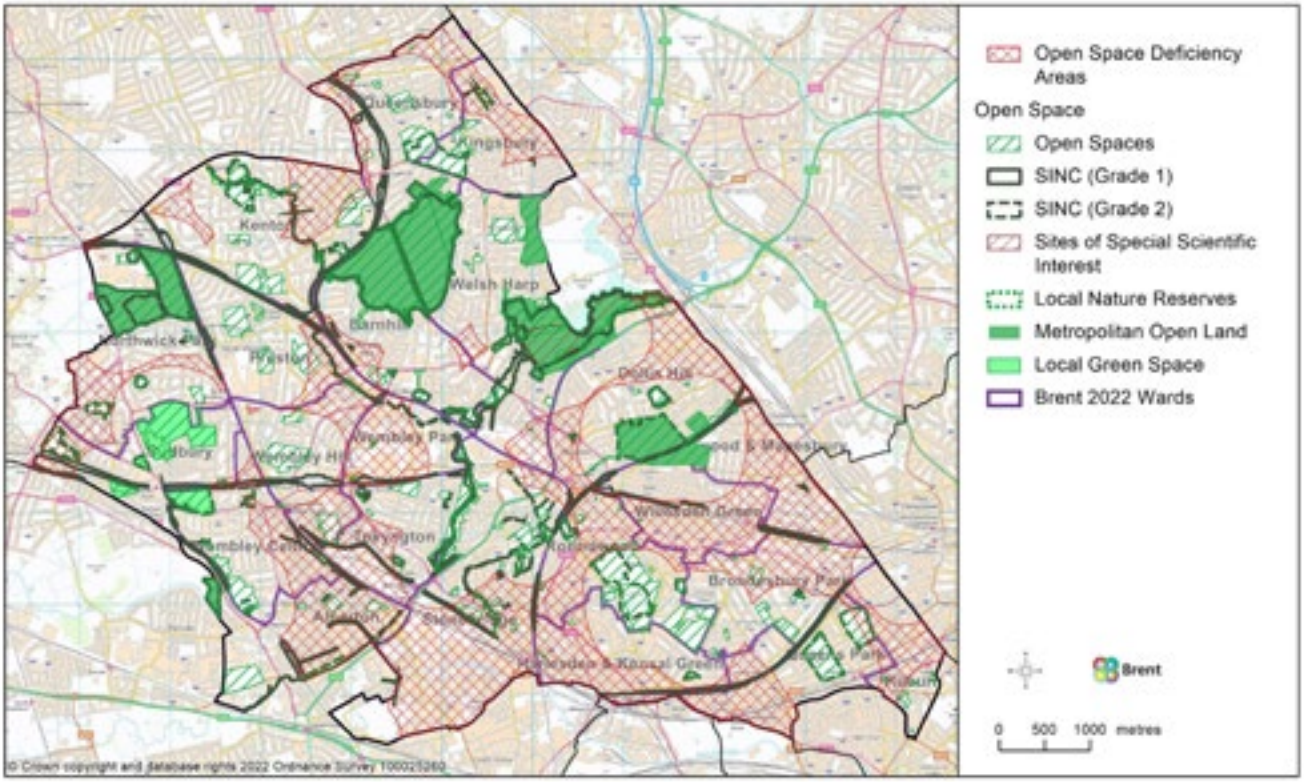
3. Green Infrastructure

3.1 Green Infrastructure in Brent

There are a variety of sizes and typologies of open space within the borough. However, in comparison to some areas, there are parts of the borough with a lower percentage of accessible public open space that fall within open space deficiency (see **Map 1**). This is due to existing and projected population growth, a significant variation in open space distribution and also physical barriers to accessibility.

The Brent Local Plan identifies wards with open space deficiency. These open space deficiency wards have been updated to include changes made in 2022 to their boundaries: Alperton, Brondesbury Park, Harlesden & Kensal Green, Kilburn, Cricklewood & Mapesbury, Queens Park, Queensbury, Tokyngton, Wembley Central and Willesden Green. Local Plan Policy BGI1 requires major residential developments in these wards to:

- Provide open space on-site,
- For it to be publicly accessible, and
- Cater to various users.



Map 1: Existing green infrastructure and open space deficiency areas in Brent

3.2 Policy Overview

National Policy & Guidance
NPPF 2021 Chapter 15
Environment Act 2021
Biodiversity Net Gain Implementation guidance
Defra/Natural England Biodiversity Metric
CIRIA Biodiversity Net Gain. Good practice principles for development 2019
Landscape Institute Cities, Green Infrastructure and Health 2015

London Plan Policy & Guidance
London Plan Policy G1 Green infrastructure
London Plan Policy G4 Open space
London Plan Policy G5 Urban greening
London Plan Policy G6 Biodiversity and access to nature
London Plan Policy G7 Trees and woodlands
London Plan Policy G8 Food Growing
London Plan Policy T2 Healthy Streets
London Plan Policy D12 Fire safety
Mayor of London LPG Urban Greening Factor (draft)
Mayor of London LPG Fire Safety (draft)
Mayor of London Urban Greening for Biodiversity Net Gain: A Design Guide 2021
Mayor of London Planning for Biodiversity 2016
Mayor of London Environment Strategy 2021 (draft)
Mayor of London SPG All London Green Grid
GRO The GRO Green Roof Code 2014
CIEEM Biodiversity Net Gain Report and Audit template
TDAG Guides on Trees
Tools: Green Infrastructure Focus Map
Planning data map
Greenspace information for Greater London CIC

Local Plan Policy & Guidance
Brent Local Plan Policy BGI1 Green and Blue Infrastructure in Brent
Brent Local Plan Policy BGI2 Trees and Woodlands
Brent Biodiversity Action Plan 2007
Brent Open Space, Sports and Recreation Study 2019

3.2.1 Green Infrastructure (GI) covers a range of natural assets. It can include public open space, country parks, playing fields, allotments, cemeteries, churchyards, woodlands, trees, wildlife linear corridors/green chains, highways verges, green roofs & walls. It has an important role to play at various scales, in enhancing environmental sustainability.

3.2.2 Green assets bring a multitude of improvements to air quality, ecology, health and wellbeing, energy savings, biodiversity conservation, wildlife refuge, microclimate, flood risk, local food production, place shaping, social cohesion, economic value, sport, recreation, play and relaxation. The council aims to support development that delivers green infrastructure that is beneficial to the local environment, increases provision and improves accessibility.

3.2.3 The Environment Act 2021 provides the statutory basis for the targets, plans and policies for improving the natural environment. The Mayor of London is looking to publish a new London Environment Strategy that will draw upon all aspects of the existing strategy. This includes achieving a 50% greener London, a 10% increase in tree canopy, enhancing biodiversity, gathering evidence and tools, and providing guidance and policies.

3.2.4 To support implementation of the strategy, the following London Plan policies form the basis for GI planning requirements:

- Designated Open Spaces: Policies G1, G2, G3 and G4;
- Urban greening Factor: Policy G5;
- Biodiversity Net Gain and access to nature: Policy G6;
- Protecting trees and woodlands: Policy G7;
- Food growing: Policy G8; and
- Fire safety: Policy D12.

3.2.5 To embed GI into all new development, Local Plan Policies BGI1 and BGI2 provide the overarching policy approach for the borough's natural environment. These seek to protect, enhance, increase, and manage the multi-functional network of green infrastructure.

3.2.6 In applying the policy requirements, consideration will be given to its quality, quantity and functionality as part of the wider green infrastructure network.

3.3 Key Policy Consideration: Designated Open Spaces

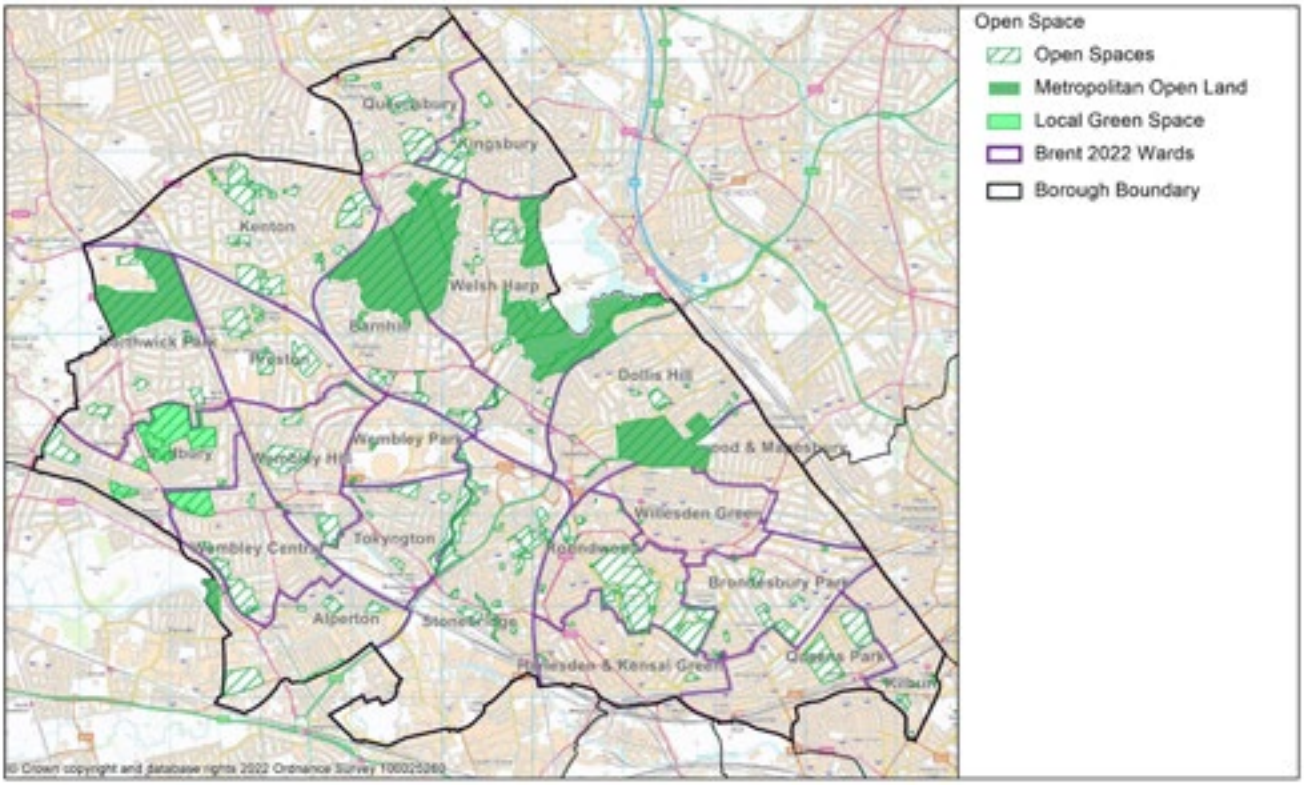
3.3.1 London Plan Policies G1, G2, G3, G4 and G6 protect London's network of many different forms of green and open spaces.

3.3.2 London Plan Policy G4 and Table 8.1 categorise a set of public open space typologies, size guidelines and minimum distance standards as a benchmark. These designated open spaces are identified on the Local Plan Policies Map. Consequently, protection from inappropriate development occurs (see **Table 4** below).

Open space categorisation	Size guidelines	Distances from homes
Regional Parks	400 ha	3.2 to 8 km
Metropolitan Parks	60 ha	3.2 km
District Parks	20 ha	1.2 km
Local Parks and Open Spaces	2 ha	400m
Small Open Spaces	Under 2 ha	Less than 400 metres
Pocket Parks	Under 0.4 ha	Less than 400 metres
Linear Open Spaces	-	-

Table 4: London Plan Open Space Categorisation

3.3.3 Local Plan Policy BGI1 requires development to not result in the loss of designated open space, ensure access to nature, and address areas that are deficient in open space. Deficiency is defined as being more than 1km walking distance from a Metropolitan Park or Borough SINC (Site of Importance for Nature Conservation) and 400m away from an accessible Local Park and Open Space. Policy BGI1 also identifies a list of wards in deficiency and sets out criteria to assess necessary on-site and off-site provision (see **Section 3.10**).



Map 2: Designated public open spaces in Brent

3.4 Key Policy Consideration: Urban Greening Factor

3.4.1 London Plan Policy G5 sets out quality urban greening as a fundamental element of development site and building design. The Urban Greening Factor (UGF) determines the appropriate quantity of greening in a scheme.

3.4.2 The method assigns a score to each surface cover type depending on their contribution to natural greening, potential for rainwater infiltration and less intensive management. The type and factor score set out in the London Plan is replicated in **Table 5** below.

Surface cover type	Factor score	Design considerations
Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on-site	1	Create new areas of locally relevant priority habitat(s)
Wetland or open water (semi-natural; not chlorinated) maintained or established on-site	1	Can form part of a wider SuDS scheme and create new areas of locally relevant priority habitat(s)
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm	0.8	Can create heavy and dense roof cover with orchard/meadow/shrubs to provide for birds. Suitable to sheltered locations
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree	0.8	Choose species of wildlife value. Avoid up-lighting and place new trees to enhance bat flight-lines
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014	0.7	Create roofs with open mosaic and provide flower-rich priority habitats. See London Wildlife Trust guide 'A buzz on top'. Tolerant of windswept, exposed locations and low maintenance
Flower-rich perennial planting	0.7	Choose species that are pollinator friendly
Rain gardens and other vegetated sustainable drainage elements.	0.7	Choose ecological design to create valuable habitat as a secondary benefit

Surface cover type	Factor score	Design considerations
Hedges (line of mature shrubs one or two shrubs wide)	0.6	Choose native species for pollinators and other invertebrates, also to provide shelter and foraging resources for birds. Create an ecotone[13] with adjacent grassland or woody vegetation.
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree	0.6	Choose species of wildlife value. Avoid up-lighting and place new trees to enhance bat flight-lines.
Green wall – modular system or traditional climbers rooted in soil	0.6	Can provide nesting or roosting sites and pollinator-friendly planting. Use rainwater or grey water to irrigate
Groundcover planting	0.5	Choose species of known wildlife value for seasonal biodiversity benefit
Amenity grassland (species-poor, regularly mown lawn)	0.4	Value for invertebrates can be increased by the addition of wildflowers tolerant of regular mowing in lawn turf
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014	0.3	Sedums are of value to some pollinators when in flower. Benefit other invertebrates by incorporating log piles, soil mounds and plug plants
Water features (chlorinated) or unplanted detention basins	0.2	Can create SUDs for wildlife friendly alternative design options
Permeable paving	0.1	Minimise where possible
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone)	0	Minimise where possible

Table 5: London Plan Open Space Categorisation

3.4.3 **Calculation:** The GLA has provided an UGF calculator as a tool to assist applicants to calculate the total score of a proposal. The calculation is as follows: (Factor A x Area) + (Factor B x Area) + (Factor C x Area) etc. divided by Total Site Area = Total Score.

3.4.4 The steps of how to calculate are as follows:

Step 1: Assign each surface cover type with UGF factor score in line with **Table 5**

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Step 2: Measure the area of each surface cover type in sqm

↓

Step 3: Multiply the factor by area of each surface cover type

↓

Step 4: Add the scores together

↓

Step 5: Divide the combined score by total site area to achieve total UGF score

↓

Step 6: Submit UGF Masterplan and score with planning application. In case of pre-application, submit draft UGF masterplan and preliminary UGF score.

↓

Step 7: Include a Management and Maintenance Plan

↓

Step 8: Inform the proposal's BNG, Tree Report and Amenity Space Quality Statement[14]

↓

Step 9: Adhere to any planning conditions attached to the permission

Table 6: UGF methodology

3.4.5 In providing a UGF masterplan and calculating the UGF score, the following should be considered in line with the draft Urban Greening Factor LPG:

a) All proposed forms to be measured in sqm;
b) Retained surface cover type should be included in the calculation;
c) Vertical surface areas of green walls should not be added to the site's total area;
d) Where a surface cover type is not included in **Table 5**, a reasonable assumption of the most relevant factor score should be made and recorded on the UGF masterplan;
e) Green roof area total should include that underneath photovoltaic panels;
f) In case of mixed planting, the whole planting bed should be assigned to the dominant cover type;
g) Allotments set aside for food growing should be assigned the equivalent hedges factor score; and
h) The projected tree canopy is to be measured as the stated maximum by the supplier nursery. For trees planted within the site, it includes any canopy beyond the boundary but not vice-versa.

3.4.6 A combination of policies in the London Plan and Brent Local Plan set the target scores. It is 0.4 for major and minor residential development and 0.3 for commercial buildings. This excludes the B2 and B8 use classes, however, in those cases the council encourages the highest UGF that can be attained. In the case of mixed-use developments, the use class that has the highest square metre floorspace area should determine the target UGF score.

3.5 Key Policy Consideration: Biodiversity Net Gain

3.5.1 A combination of the Environment Act 2021, London Plan Policy G6 and Local Plan Policy BGI1 set out a mandatory 10% increase in biodiversity in all new major and minor developments. Biodiversity Net Gain (BNG) is a development approach creating an increase in better quality biodiversity compared to what previously existed. This includes all species of wildlife and planting.

3.5.2 All developments are encouraged to plan for green infrastructure in a way that complements and co-exists with the existing elements. SINCs and ecological corridors already provide high value biodiversity (see **Section 3.6**). However, in order to achieve the increase in biodiversity, London Plan Policy G6 and Local Plan Policy BGI1 set a baseline to protect and conserve priority species and habitats[4] that are outside the SINC and ecological corridors.

3.5.3 BNG is achieved by measuring and assessing the existing ecological value and incorporating enhancements. This can be to existing habitat or creating new habitats, both on-site or off-site. Applicants need to demonstrate[5] how a scheme has followed a process for implementing BNG from design to legacy, providing consistency at every level. Appointing an ecological consultant at an early stage of the project is advised.

3.5.4 The key components of demonstrating mandatory BNG during the planning process are:

Step 1: Carry out Ecology Survey Stage 1: Preliminary Ecological Appraisal (PEA) is a baseline survey

↓

Step 2: Inform 10% BNG by using Defra's Biodiversity Metric (major applications) and Small Sites Metric (minor applications)

↓

Step 3: Where possible, on-site habitat damage should be avoided, loss should be minimised and damage restored with an increase in biodiversity on-site

Step 4: In case of non-compliance at **Step 3**, secure local compensatory habitat creation to invest in off-site

Step 5: In case of non-compliance at **Step 4**, secure compensatory habitat creation off-site via a new statutory biodiversity credits scheme

Step 6: Ecology Survey Stage 2: Use **Steps 1-5** to inform the Ecological Impact Assessment (EcIA)[15]

Step 7: Use **Step** 6 results to finalise Biodiversity Management Plan[9]/Biodiversity Gain Plan

Step 8: Submit Metric calculation, EcIA, Biodiversity Management Plan/ Biodiversity Gain Plan with the planning application. In case of pre-application, submit draft Biodiversity Management Plan/Biodiversity Gain Plan[16] and preliminary biodiversity metric outputs.

Step 9: Inform the proposal's Landscape Plan, Amenity Space Quality Statement, UGF Masterplan and Arboricultural Report

Step 10: Habitat secured for at least 30 years via planning obligations or conservation covenants

Step 11: Register site in the national register for net gain delivery sites

Step 12: Adhere to any planning conditions attached to the permission

Table 7: BNG methodology

3.5.5 Avoiding harm to biodiversity assets will always be the preferred approach. It is expected that applicants demonstrate they have explored the mitigation hierarchy. This involves:

a) Retaining habitat(s) on-site;
b) Mitigating loss on-site; and
c) Where necessary, proposing off-site compensatory measures delivered in ascending order of priority:

- Nearby;
- Within the borough;
- Within London; or
- Adjacent to London.

3.5.6 In addressing biodiversity, an EcIA, Biodiversity Management Plan/ Biodiversity Gain Plan[6] and calculations of the Metric, the following information should be considered in line with Defra's draft BNG guidance:

a) Summary of Preliminary Ecological Appraisal (PEA) baseline survey;
b) Biodiversity metric calculations detailing pre-development and post-development biodiversity value;
c) Steps taken towards the mitigation hierarchy and alternative layouts;
d) Approaches to enhancements on-site/off-site;
e) Any off-site gains or statutory biodiversity credits purchased;
f) Considering the direct and indirect impacts of proposed development;
g) If pre-application ecology survey stages identify that further survey(s) are required, these must be submitted with the application;
h) Bringing together all habitat enhancement on-site while meeting other policy requirement of UGF and trees;
i) Timescales for habitat creation, management, monitoring and reporting to the council; and
j) Evidence with the application from a suitably qualified person if there are no protected species or priority habitats present on-site.

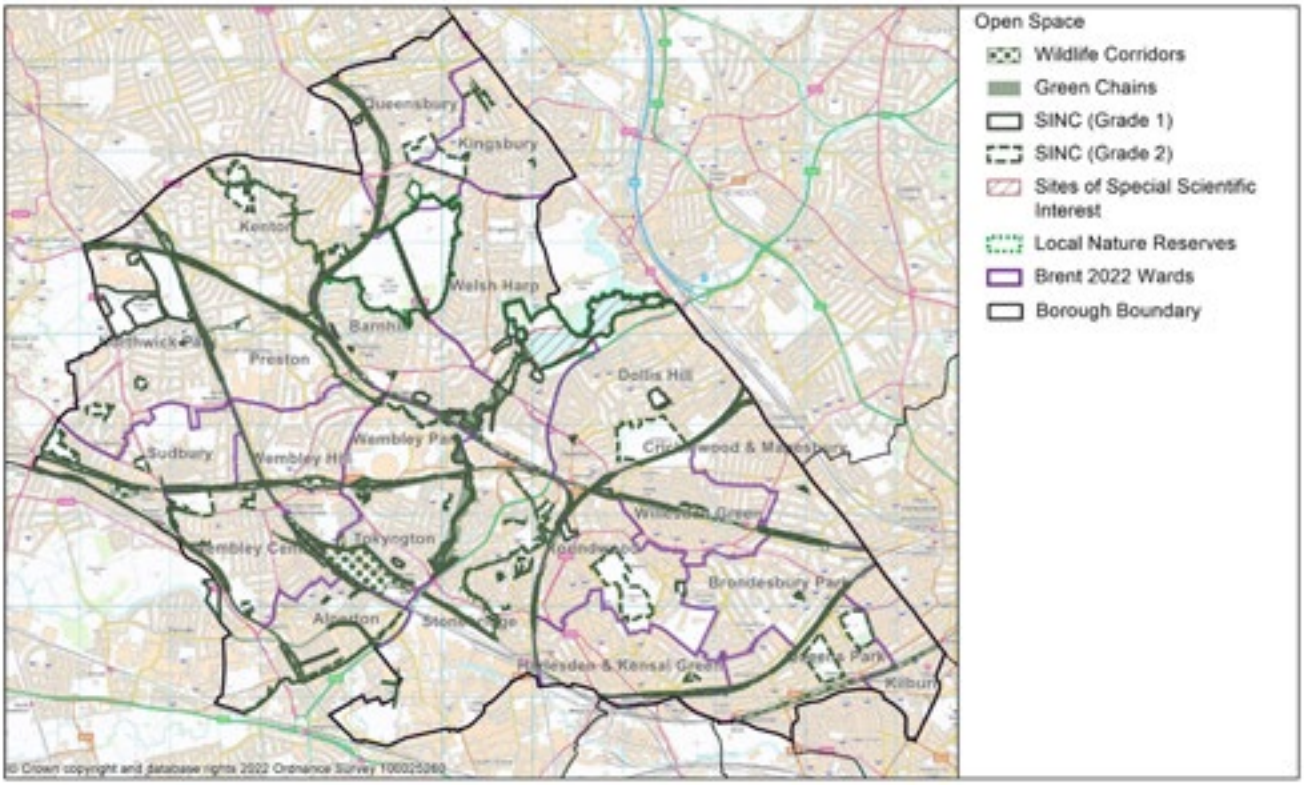
3.6 Key Policy Consideration: SINCs and Green Chains

3.6.1 The Wildlife & Countryside Act 1981 underpins nature conservation areas with biodiversity or geological value with statutory protection. **Map 3** shows Sites of Special Scientific Interest (SSSI) and Local Nature Reserves in Brent.

3.6.2 There are also non-statutory local sites that are afforded a high level of protection through the NPPF and the London Plan due to the presence of priority habitats and species. This includes SINC (Grade I and II).

3.6.3 For the parts of green corridors outside SINCs, a lower level of protection is recommended. A green corridor, also referred to as green chain, habitat corridor or wildlife corridor is a linear natural habitat connecting the urban environment. It allows movement of wildlife. Common examples are along railway embankments, riverbanks and roadside verges.

3.6.4 Protection guards it against harm from new development. It also places a duty on the applicant to undertake an appropriate assessment.



Map 3: Statutory and non-statutory sites protected in Brent

3.6.5 London Plan Policy G6 and Local Plan Policy BGI1 recognise that there are many opportunities for new developments to contribute to enhancing the nature conservation value of adjacent SINC or green corridors. Developments in the immediate vicinity (Zone of Influence) of SINC and ecological corridors are required to establish connections to support associated species.

3.6.6 The Brent Sites of Importance and Nature Conservation Study (2014) identifies high value sites and suitable enhancements that can be brought forward by developments. In an urban context, these measures can include:

a) Providing a buffer zone between SINC and built-up areas;
b) Avoiding surface water-run off directly into the SINC;
c) Sympathetic landscaping to provide complementary habitat;
d) Installation of artificial nest sites, installation of swift nesting bricks and integral nest boxes;[7]
e) Bat boxes in the vicinity of SINCs, where there are corridors connecting the site to the SINC;
f) Ponds on sites or suitable amphibian habitats in the vicinity of SINCs;
g) Green roofs suitable for Black Redstarts;
h) Green walls suitable for nesting, or next boxes, for bird/bats/bees, whilst native grass and herbs can provide food for butterflies and moths;
i) Planting of Bee Swards instead of amenity grassland;
j) Landscape planting using nectar rich species; and
k) Designing out obtrusive lighting.

3.7 Key Policy Consideration: Trees and Woodlands

3.7.1 Trees play an important role in mitigating the effects of air pollution and flooding. They add value to amenity space and reduce the urban heat island effect. London Plan Policy G7 protects London's urban forest and woodlands. Similar to Local Plan Policy BGI2, it requires new developments maximise efforts to retain existing trees of value. The majority of Brent's existing tree stock is on private land. There are however, a significant number of trees owned and directly managed by the council in parks, woodlands, streets, housing estates (under Brent Housing Management (BHM)), cemeteries and allotments.

3.7.2 The council uses its powers under Section 197 of the Planning Act 1990 to apply Tree Preservation Orders (TPOs) to protect trees. In Brent, such Orders are not ordinarily put on every tree with a high amenity value. A TPO is usually only made where the council considers that a tree or group of trees may without the Order be under threat of loss or inappropriate pruning. A tree with a TPO cannot be wilfully damaged nor without the council's permission managed by pruning.

3.7.3 Trees on privately-owned land not covered by a TPO or outside a conservation area do not require permission to either be felled or for other works. However, where the council is aware such work is likely to occur to trees which it considers have a high amenity value, it may seek to make a TPO to require the tree's owner to seek consent.

3.7.4 Existing trees on private land are encouraged to be retained as part of new development. Trees that exist on or adjacent to a development site are considered to be a material consideration where planning permission is required. In such cases, the following key components should be followed during the planning process:

Step 1: Carry out Arboricultural Impact Assessment (AIA)/Tree Survey in line with British Standard 5837

↓

Step 2: Recommendations of survey inform retention or retention and new tree(s) or new tree(s)

Step 3: Where possible, on-site trees should be retained. In this case, an Arboricultural Method Statement should be submitted to demonstrate measures to safeguard retained trees.

Step 4: In the case of loss of trees, re-provision of new trees should be on-site in line with British Standard 8545

Step 5: In case of **Step 3** and **Step 4** non-compliance, secure replacement canopy cover with compensatory new trees off-site via a financial contribution using Defra/ Natural England supported calculator

Step 6: Submit Arboricultural Report/Tree Report with the planning application

Step 7: Include a Management and Maintenance Plan

Step 8: Inform the proposal's UGF Masterplan, BNG Plan and SuDS Strategy

Step 9: Abide by any planning conditions attached to the permission

Table 8: Tree planting methodology

3.7.5 In case of any damage or unapproved loss of a tree(s) on-site, replacement with an appropriate tree(s) will be required. This must aim to provide the same canopy cover as that originally provided. The canopy cover is measured as the new trees canopy at time of planting being equal to canopy area of existing trees canopy removed.

3.7.6 Where new trees are being proposed, it is essential that the design of a new development considers:

a) Right species,[8] right location, right reason and right tree for a changing climate;[9]
b) Growth over time to ensure tree roots, branches and canopies won't cause any future issues;
c) Realistic assessment of the current and future relationships between the existing trees and new structures;
d) Potential impact of the tree canopy shading and avoiding situations where dense shading could be a safety problem;
e) Problems, such as soakaways liable to becoming blocked, e.g. through roots or leaf drop;
f) Creating connected tree pits using cell systems with shrubs under tree canopies to create structure;
g) Selecting plants that root at different depths to limit competition between species; and
h) Tree protection and maintenance.

3.7.7 Where proposing retention of existing trees, careful consideration is essential to preserve the tree's integrity and its environment by avoiding:

a) Damage during construction such as vehicle cohesion and root severance;
b) Indirect factors such as changes to ground level, trenching and compaction of soil and contamination; and
c) Hard surfaces within the Root Protection Area (RPAs) of retained trees hindering soil water and nutrient absorption.

3.7.8 Given the above considerations, the Arboricultural Report should include the following information:

a) Tree Survey Plan showing every tree location to scale;
b) Tree Quality Assessment/Schedule showing: every tree's species name, recording TPO, height, stem diameter, branch spread, age (young, semi-mature, mature, over-mature, veteran), documenting health, preliminary management recommendations, remaining useful life of the tree and categorise the tree for removal or retention, taking into account all the relevant factors; and
c) Tree Constraints Plan showing position and crown spread, RPA, Future Growth Potential and shade footprint throughout the day.

3.8 Key Policy Consideration: Food Growing

3.8.1 The Allotments Act 1922, London Plan Policy G8 and the supporting London Food Strategy protects allotments. Policy G8 and the Strategy focus on the importance of food growing in community gardens, allotments, schools, urban farms and other development spaces. Policy G8 also encourages urban agriculture space provision in new developments and as a meanwhile use on vacant or under-utilised sites.

3.8.2 Urban agriculture is the practice of cultivating, processing and exchanging food in and around urban areas. This can be divided into two types:

1) Traditional urban agriculture involves small scale growing of vegetables and fruits consumed by landowners/leaseholders. This could be an allotment, local community garden, school garden, garden centre or on a development;
2) Contemporary urban agriculture involves high-tech intensive growing, relying upon controlled environments on private land. The produce comes from various cultivation methods of vertical farming, green wall/roofs, mycelium farming, hydroponics, aquaponics, and is for specialist markets, local and specialist restaurants.

3.8.3 Food growing opportunities bring many cross-cutting benefits. These include improved food security, education, biodiversity, social interaction and mental and physical health well-being. The Mayor highlights support of the London Capital Growth Network. They offer a gardens map tool, a food growing guide and harvest-ometer, tracking capital food savings.

3.8.4 Brent has 22 statutory allotments sites. These currently have at least a one to two year waiting list. In some cases, it can be up to five years.[10] The council has an overall responsibility for the allotments service management. However, given future demand, developers should demonstrate a clear approach to establish food growing opportunities in new major developments. Provision can also be a meanwhile use on vacant and underutilised land.

3.8.5 Brent has 49 independent food growing sites[11] that are short-term non-statutory sites. The Local Plan (para 6.6.22) seeks food-growing opportunities in new major residential developments. It also encourages creation of new plots for food growing on major development sites where possible.

3.8.6 Provision for food growing or new allotment sites should address the following specific considerations:[12]

a) Site location: spatially well connected, safe walking routes, accessibility for disabled, vehicular access for contemporary urban agriculture sites;
b) Site functionality: utilities such as cost-effective water supply, electricity, drainage, waste management, soil composting, soil formation to support seeding and gestation, socially integrated and accessible for community food exchange and knowledge transfer;
c) Land security: tenancy agreements to include length of tenure, recognition of a responsible party to take ownership, obligations to maintain the plot clean, keep it free from weeds, in a good fertile state and cultivated regularly;
d) Foodscaping: increasing tree canopy and cover by integrating urban orchards and fruit growing shrubs;
e) Site management: Appoint site representatives, enforce non-cultivation criteria and offer advice to tenants;
f) Explore creative opportunities: such as vertical farming and greenhousing and local business partnerships; and
g) Encourage allotment uptake: a seasonal local food source, and potentially organic, supporting an active lifestyle, encouraging composting of green waste and offering lower cost dietary benefits.

3.8.7 Provision for food growing opportunities should be shown on the Landscape Plan. Depending on the scale of the proposal, details should be addressed in a Food Growing Statement or a Design & Access Statement. Signposting opportunities in the Amenity Space Quality Statement will be encouraged.

3.9 Planning to Mitigate Impacts on Green Infrastructure

3.9.1 In assessing planning applications that may impact green infrastructure, the council will have regard to the Environment Act 2021, NPPF, London Plan and Local Plan. Other guidance will include LPGs, local strategies, SPD1 Design Guide and this SPD. Provision of new open spaces should:

a) Involve experts, considering green infrastructure at the early design process;
b) Be appropriately designed to be accessible, safe, connected, visual impact, usable and integrated into the development site;
c) Enhance biodiversity by considering micro-climatic conditions, creating a mosaic of interconnected habitats;
d) Be integrated into adjacent existing green infrastructure networks and landscape buffer zones;
e) Establish a functional and climate-resilient landscape, reducing irrigation, energy input and intensive management needs;
f) Delivered to instil a sense of local community ownership and responsibility; and
g) Include a suitable long-term Management and Maintenance Plan.

3.9.2 The following assessments and their evidence base will be required depending on the key policy considerations and application type as outlined in Sections 3.2 to 3.8:

- **UGF Masterplan**
  - UGF score calculation and surface area type
- **Ecology Survey**
  - Preliminary Ecological Appraisal
  - Ecological Impact Assessment
- **Biodiversity Management Plan/Biodiversity Gain Plan**
  - BNG metric or Small Sites Metric calculation
- **Arboricultural Report**
  - Arboricultural Impact Assessment (AIA)/Tree Survey
  - Arboricultural Method Statement
- **Landscape Plan**
- **Amenity Space Quality Statement** (see the emerging Residential Amenity Space and Place Quality SPD)
- **Management and Maintenance Plan**

3.9.3 In addressing the key policy considerations, all supporting evidence including calculations, surveys, mitigation hierarchy, justifications, timetables for habitat creation, maintenance, monitoring and reporting must be submitted to the council.

3.9.4 The borough offers a wide range of green infrastructure networks. Notwithstanding this, there are network gaps and considerable opportunities in new development proposals to address this, expanding the offer and focus in areas that do not meet the standards in terms of quality and accessibility.

3.9.5 Landscape architects and ecologists should be engaged from the design processes start. This will likely better meet Local Plan Policy BGI1 open space requirements, delivering valuable greening. Housing typologies will integrate greening beneficial to occupiers, ensure appropriate responses to meeting greening priorities, recognise site-specific constraints and develop a suitable Management and Maintenance Plan.

3.9.6 The Management and Maintenance Plan should consider identifying:

- Responsibilities for on-site management and upkeep of green infrastructure assets;
- Any planned occupier service charge;
- An equipment storeroom;
- Methods to inspire occupier interest in ownership of the green space; and
- Council adoption, which will be subject to agreement and a suitable commuted sum secured for ongoing maintenance.

3.10 Development Management

3.10.1 The following section aims to provide a clear and consistent approach for stakeholders to meet the borough's greening priorities. At each planning application stage, the following will be required:

- **Phased development:** Each phase should demonstrate through relevant assessments compliance with the key policy considerations. All assessments to include calculations for the development as a whole and additional table showing calculations for all phases.

- **Outline applications:** All assessments to include an 'Implementation Plan' explaining how the key policy considerations will be secured at the detailed design and application stage. Planning conditions may secure revision to assessments as part of a Reserved Matters application in regard to a change in layout, transport or energy strategy.

- **Pre-applications:** Preliminary UGF calculation and draft masterplan, Preliminary Ecological Appraisal (PEA), draft Biodiversity Management Plan/Biodiversity Gain Plan and preliminary biodiversity metric outputs and Arboricultural Impact Assessment (AIA)/Tree Survey, Preliminary Amenity Space Quality Statement.

- **Full applications:** UGF Masterplan, EcIA, Biodiversity Management Plan/ Biodiversity Gain Plan, Arboricultural Report, Landscape Plan, Food Growing Statement, Management and Maintenance Plan and Amenity Space Quality Statement.

3.10.2 The planning requirements for each type of proposed development are listed in tables below. These set out measures for:

Major Development | **Minor Development**

Change of use | **Permitted Development**

Major Development

A Growth Areas: development should deliver open space specifications in line with the relevant policies in the Local Plan or Masterplan SPD;

B Open space deficiency areas: development should maximise provision on-site;

C Elsewhere, development should provide open space on-site. An exception would be a Local Area of Play (LAP) if one is within 400m by a direct and safe walking route;

D Avoid loss of open space. In cases where this is avoidable, off-site compensation site should be provided;

E Within a SINC or green corridor's Zone of Influence, should consider enhancing its biodiversity;

F Achieve 0.4 UGF for residential schemes and 0.3 UGF for commercial schemes;

G Deliver 10% increase on existing biodiversity and incorporate measures listed in **para 3.5.6**;

H Consider providing food growing opportunities;

I Provide trees in line with the mitigation hierarchy.

Minor Development

J Maximise open space on-site;

K Within a SINC or green corridor Zone of Influence should consider enhancing that adjacent asset's biodiversity;

L Achieve 0.4 UGF for residential schemes;

Minor Development *(continued)*

M Deliver 10% increase in existing biodiversity;

N Provide trees on-site.

Change of Use

O Must provide replacement for trees lost on or off-site;

P Consider improvement and integration of green infrastructure.

Permitted Development

Q For residential extensions, decking, sheds/annexes and driveways where green infrastructure is lost, provide compensatory measures elsewhere on-site e.g. green roofs/walls, enhanced planting and alternative surface water attenuation.

3.11 Planning Conditions and Obligations

3.11.1 Planning conditions will where necessary secure green infrastructure measures. Conditions may take a number of forms depending on the nature of the development and the policy requirement triggers. In the case of a financial contribution, this will be through a Section 106 planning obligation.

3.11.2 Where appropriate and adequate mitigation measures on-site cannot be delivered, the council will agree an offsetting payment. The council's Planning Obligations SPD sets out the contribution methodology.

3.11.3 Section 106 and Section 278 agreements can be used to secure financial measures where appropriate.

Planning Conditions

R Design phase:

- On-site measures outlined in assessments in cases where the design of the scheme is evolving;
- Off-site measures will be secured where requirements are not met on-site;
- Contribution to improve an existing open space's quality and/ or accessibility;
- Management and maintenance requirement;
- Ensuring commitments in approved Biodiversity Management Plan/Gains Plan;
- Proof of conservation covenant for BNG; and
- If indicative values are used at the application stage, final values will be required pre-implementation.

S Construction phase:

- Required to meet the mitigation measures identified in the approved assessments to avoid harm to green infrastructure asset on-site and in Zone of Influence;

T Operational phase:

- Management and maintenance.

3.12 Monitoring Requirements

3.12.1 Monitoring will be required as listed in the table below. This is to prevent a performance gap and quantify proposed green infrastructure assets. Additional monitoring will be determined on a case-by-case basis and will need to be addressed in the assessments. This will generally depend on the type of planning application, existing green infrastructure assets on and around the site, risks from the development, and financial implications of such monitoring.

3.12.2 The data recorded will assist the council to inform the annual AMR (Authority Monitoring Report).

Monitoring

U All developments should record the UGF scores in the London Planning Datahub;

V All BNG proposals will be required to monitor the performance for 30 years; and

W Report any loss of Category A Tree Preservation Order trees.

4. Water Management

4.1 Water Management in Brent

Brent's existing Blue Ribbon Network (London's strategic network of water spaces) includes the River Brent, the Grand Union Canal (Paddington Arm), Brent Reservoir, Wealdstone Brook, Brent Feeder Canal and Dollis Brook. Water quality is "moderate" status in all waterbodies.

The Brent Catchment Partnership (BCP) is made up of a number of organisations working collectively to improve the rivers, brooks, streams, lakes and canals in order to make them more accessible, attractive, and cleaner. The BCP's objective is water quality in the Brent catchment having a "good" ability to support wildlife by 2027.

Map 4: Brent Catchment Area and River Brent tributaries in the borough

4.1.1 Historically, Brent has had a low to moderate flood risk. Climate change is however, expected to increase the frequency and severity of flood events. In Brent, surface water/pluvial flooding, river flooding, sewer and groundwater flooding are all significant considerations. Surface water flood risk is higher, however confluence and gradient, ageing drainage infrastructure and population growth pressure is further increasing risks.

4.1.2 Sewer flooding is uncommon, but is generally higher in the borough's north than south. Relatively limited flooding has occurred from main rivers and watercourses. Notwithstanding this, areas next to these watercourses form part of a natural floodplain resulting at risk of fluvial flooding.

4.1.3 The West London SFRA provides interactive maps. These show flood risk sources within Brent and their extent, including a description of the different types of flooding. There are four fluvial Flood Zones:

- **Zone 1:** Low probability (less than a one in 1,000 annual probability in any year)
- **Zone 2:** Medium probability (between a one in 100 and one in 1,000 annual probability in any year)
- **Zone 3a:** High probability (a one in 100 or greater probability)
- **Zone 3b:** Functional floodplain – where water flows or is stored in times of flood (a one in 30 or greater in any year probability).

4.2 Policy Overview

National Policy & Guidance
The Flood Risk Regulations 2009
The Flood and Water Management Act 2010
The Water Environment Regulations 2017
The Environment Act 2021
NPPF Paras 152, 153, 159-169, Annex 3: Flood risk vulnerability classification
Planning Practice Guidance: Flood Risk and Coastal Change; Flood risk assessment in Flood Zones 2 and 3; Flood risk assessment in Flood Zone 1 and critical drainage areas; Review individual flood risk assessments: standing advice for local planning authorities; The sequential test for applicants; and Water supply, wastewater and water quality

London Plan Policy & Guidance
London Plan Policy SI 5 – Water Infrastructure
London Plan Policy SI 12 – Flood Risk Management
London Plan Policy SI 13 – Sustainable Drainage
London Plan Policy SI 16 – Waterways – use and enjoyment
London Plan Policy SI 17 – Protecting and enhancing London's waterways
The London Environment Strategy
The Brent Catchment Partnership River Improvement Action Plan
Thames River Basin District River Basin Management Plan
The London Sustainable Drainage Pro Forma

Local Plan Policy & Guidance
Brent Local Plan Policy BSUI1 – Creating a resilient and efficient Brent
Brent Local Plan Policy BSUI3 – Managing Flood Risk
Brent Local Plan Policy BSUI4 – On site water management and surface water attenuation
Brent Local Plan Policy BGI1 – Green and Blue Infrastructure in Brent
Brent Flood Risk Management Strategy (2015)
Brent Surface Water Management Plan (2011)
West London Strategic Flood Risk Assessment

4.2.1 Water is a renewable resource that needs to be well-managed. This will eliminate water shortages, avoid harm to properties caused by flooding and drainage issues, inadequate sanitation, control wastewater discharge and maintain the ecosystem. Water management is the planning of water, in terms of both quality and quantity. This includes:

a) Managing water efficiently (see **Section 4.3**);
b) Minimising damage to life and property (see **Section 4.4**); and
c) Maximising blue infrastructure benefits (see **Section 4.5**)

4.2.2 The Environment Act 2021 provides a statutory basis for the targets, plans and policies for improving the natural environment. The Water Environment (Water Framework Directive) 2017 regulations also aim to prevent deterioration of water quality and to improve water quality.

4.2.3 Through the Flood Risk Regulations 2009 and the Flood and Water Management Act 2010, powers and responsibilities were given to local authorities to manage flood risk more effectively. Brent Council is the Lead Local Flood Authority (LLFA) for the borough of Brent. The Act (2010) also identifies "risk management authorities" – bodies with an interest in flood risk management. In line with the above, the NPPF and associated planning practice guidance (PPG) sets strict tests to protect people and property from flooding, and advocates an "assess - avoid - manage and mitigate" approach to flood risk.

4.2.4 In line with the NPPF and PPG on utilising a risk-based approach to flooding and managing flood risk from all sources, the West London boroughs have produced a joint Level 1 Strategic Flood Risk Assessment (SFRA). This aims to provide the platform to deliver the LLFA requirements of the 2009 Regulations and 2010 Act. As a LLFA, Brent Council has also produced a Flood Risk Management Strategy (2015) and Surface Water Management Plan (2011).

4.2.5 The GLA has published the London Environment Strategy (2018). This identifies Flood Risk, Water Scarcity and River Water Quality as environmental challenges facing London, threatening the future of the city.

4.2.6 The London Plan also sets out water-related strategic policies for London: Policy SI 5 Water Infrastructure, SI12 Flood Rick Management, SI13 Sustainable Drainage, SI14 Waterways – strategic role, SI16 Waterways – use and enjoyment and SI17 Protecting and enhancing London Waterways.

4.2.7 In the local context of Brent, the Local Plan sets out water management and blue infrastructure enhancement policies: BG11 Green and Blue Infrastructure in Brent, BSUI3 Managing Flood risk and BSUI4 On-site water management and surface water attenuation. The policies seek to maximise blue infrastructure benefits, increase water efficiency and ensure that development in the borough is resistant and resilient to all sources of flooding for its lifetime. It is also key to consider all types of users of development, ensure that proposals tackle residual flood and do not increase flood risk elsewhere.

4.2.8 The below table summarises risks of types of floods in Brent, respective Flood Zone categorisation and useful resources:

Flood risk type	Flood Zone	Resources	Notes
Fluvial and Tidal	Flood Zone 1,2,3a,3b	Fluvial and Tidal flood risk map (West London strategic flood risk assessment)	Risk from River Brent and its tributaries (Grand Union Canal, Mitchell Brook, Wealdstone Brook and Wembley Brook). There may be very low risk of reservoir flooding should there be a rare case of a breach at the Brent Reservoir
Pluvial/Surface Water	Flood Zone 3a[19]	Surface water flood risk map (West London strategic flood risk assessment)	West London SFRA sets out that same rules will be applied to Flood Zone 3a (surface water) as those that apply to Flood Zone 3a (fluvial).
Groundwater	No flood risk maps - contact LLFA for further information	Topography mapping Geology Mapping - borehole data Groundwater flood risk map (West London strategic flood risk assessment)	Topography mapping: information regarding gradient layered with the groundwater mapping. Geology mapping: ascertain if the site has a particularly high or low water table.
Sewer	No flood risk maps	DiGDAT Sewer flood risk map (West London strategic flood risk assessment)	Information with Thames Water infrastructure within Brent for external pipe works where development proposes to discharge water.
Critical Drainage Area	27 critical drainage areas	Notified to the council by the Environment Agency	Existing infrastructure at risk from multiple flood risk sources

Table 9: Types of flood risk in Brent

4.2.9 Water supply in Brent is managed by two companies (Affinity Water in the north, and Thames Water in the south), roughly split by the North Circular Road.

4.2.10 The Environment Agency (EA) are responsible for water quality and resources in England. The PPG provides standing advice on when they should be consulted on planning applications. Early discussions with the Environment Agency are strongly recommended for proposals within the functional floodplain.

4.2.11 The Canal and River Trust (CRT) are responsible for canals and the Brent Reservoir. The CRT website provides guidance on when they should be consulted on development proposals.

4.2.12 For development within Flood Zone 3 for surface water flooding, the applicant will be expected to have undertaken dialogue with the council's Lead Local Flood Authority (LLFA) representative prior to submission of an application.

4.3 Key Policy Consideration: Water Efficiency

4.3.1 London Plan Policy SI 5 encourages water efficiency by requiring developments to:

a) Reduce water consumption; and
b) Improve and invest in water consumption.

Reducing Water Consumption

4.3.2 Policy SI 5 encourages water efficiency measures across all development, such as smart metering, water saving and recycling measures. This can also apply to retrofitting of existing buildings.

4.3.3 A fittings-based approach is advocated to calculate water-consumption. Fittings include white goods such as washing machines and dishwashers, but also sanitary fittings such as taps, toilets and showers. Building Regulations Part G provides a breakdown of the maximum consumption per water fitting in the home. This should be used to calculate the water efficiency per head of each home being proposed.

4.3.4 For major commercial development, Policy SI 5 requires proposals to meet at least BREEAM excellent standard for the 'Wat 01' Water Category or equivalent. This standard aims to ensure not only efficient sanitary fittings, but also provision of water recycling systems and rainwater collection.

4.3.5 For residential development, the policy expects development to minimise mains water consumption to 105 litres or less per head per day (excluding up to five litres for external water consumption). This is in line with the optional requirement of Building Regulations Part G.

4.3.6 Waterwise provides information on how water usage can be minimised through a wide range of examples of fittings and practices. Development proposals (major, minor and change of use) will need to address this in a Drainage Strategy.

Improving and Investing in Water Infrastructure

4.3.7 Policy SI 5 requires development to seek to improve the water environment and ensure adequate wastewater and water supply infrastructure is provided for ahead of need.

4.3.8 It also requires the minimisation of misconnections between foul and surface water networks. Misconnections are one of the causes of foul sewage flooding into homes and gardens which can also have an impact on river water quality.

4.3.9 Where relevant, proposal for major developments will be required by Thames Water through appropriate studies to demonstrate that there is adequate capacity both on and off site to serve their proposal, and that the proposal would not lead to problems by existing users.

4.3.10 Development proposals (major, minor and change of use) will be required to submit a Drainage Strategy in relation to the above.

4.4 Key Policy Consideration: Minimising Risks from Flooding

4.4.1 The NPPF, London Plan Policies SI 12 and SI 13, and Local Plan Policy BSUI3 requires all development to be resistant and resilient to all sources of flooding. Where relevant, developments will be required to submit various assessments and evidence to demonstrate (see **Section 4.6**):

a) Avoidance of flood risk area through careful selection of site and assessment;
b) Maximise measures to control, manage and mitigate flood risk;
c) Integrate inclusive human and structural safety implications;
d) Consider the residual risk remaining after mitigation actions are taken;
e) Flooding is not increased elsewhere due to development; and
f) Use of sustainable drainage systems in line with drainage hierarchy.

Key Flood Mitigation Measures

4.4.2 Some of the key measures to take into consideration for all types of flood risks are listed below. The list is not exhaustive, but a starting point for more innovative ideas:

a) Assess risks utilising existing flood mapping, undertaking flood risk modelling, areas acting as floodplain and its depth;

b) Assess development impact for associated change to storage/flow route function of the land surrounding the proposed building;
c) Determine type of uses proposed against vulnerability classification;
d) Determine development approach through careful consideration of building footprint and its placement;
e) Use flood resistant construction methods[17] and materials that promote easy draining and drying;
f) The ground level finished floor levels of at least 300mm above the design flood level of the Flood Zone;
g) Install power outlets up the wall;
h) Ensure water tightness with continuous damp proof membrane and floor to wall joints;
i) Suspended floors;
j) Ensure one safe access evacuation;
k) Avoid new basement dwellings in areas of high risk flooding;
l) Make proper provision for surface water drainage into the ground, water courses or surface water sewers;
m) Consider main drainage system to have non-return valve and pump sewerage systems;
n) Development proposals should avoid any interference in existing watercourses which is likely to increase the risk of blockage, erosion, or other disruption of their natural flow pattern, including culverting, pipe crossings, encroachment into watercourses;
o) Ensure that infrastructure remains safe and operational for building occupiers during flood periods;
p) Adopt land management practices to improve water infiltration;
q) Impermeable surfacing.

Sustainable Drainage Systems

4.4.3 The NPPF requires all major development and all other developments in areas of flood risk to utilise Sustainable Drainage Systems or SuDS. Multifunctional SuDS should be integrated into the design of the proposal at early stages to ensure that surface water run-off is managed as close to where it falls. Impermeable surfacing will be resisted on front gardens and driveways in line with the Brent Design Guide SPD1.

4.4.4 London Plan Policy SI 13 and Local Plan Policy BSUI4 places great weight on development achieving greenfield run-off rates[18] through SuDS. This can be through rainwater storage, infiltration, attenuation or discharge. Policy SI 13 sets out a drainage hierarchy in preference for green features that increase infiltration and facilitate rain harvesting over grey features (such as increasing drainage capacity).

4.4.5 In some circumstances, a development may include more than one stage of the drainage hierarchy:

Stage 1: Rainwater use as a resource

Stage 2: Rainwater infiltration to ground at or close to source e.g. soakaways, permeable paving, bioretention/tree pits

Stage 3: Rainwater attenuation in green infrastructure features for gradual release e.g. green roofs/walls, water features, underground tanks

Stage 4: Rainwater discharge direct to a watercourse (unless not appropriate)

Stage 5: Controlled rainwater discharge to a surface water sewer or drain

Stage 6: Controlled rainwater discharge to a combined sewer

Table 10: Drainage hierarchy

4.4.6 Development will be required to demonstrate its discharge arrangements within a Drainage Strategy, including showing how run-off rates have been achieved. The SuDS attenuation rates calculation will need to be confirmed with the LLFA to ensure that the infrastructure size demonstrated is correct.

4.4.7 Examples of SuDS measures are green roofs, rainwater harvesting, soakaways, permeable paving, bioretention/tree pits. The SuDS manual provides technical advice to assist in the planning, design, construction, management and maintenance of good SuDS.

4.4.8 The utilisation of SuDS can deliver multiple benefits and is closely related to carbon storage, re-use, water quality, biodiversity, urban greening, amenity and recreation. Drainage solutions should therefore be an integrated element of a site's green infrastructure and considered alongside **Chapter 3** of this SPD and the emerging Residential Amenity Space and Place Quality SPD.

4.5 Key Policy Consideration: Maximising Blue Infrastructure Benefits

4.5.1 The London Plan (para 9.1.14) identifies London's waterways as multifunctional assets. In addition to providing drainage, flood management and urban cooling functions, they also provide transport and recreation corridors, green infrastructure, diverse habitats, community and recreational activities, and homes for some Londoners.

4.5.2 London Plan Policy SI 5 states that the Water Framework Directive requirements should be maintained by the relevant river catchment plans. The BCP has produced an Improvement Plan to support the improvement of cleanliness, accessibility and attractiveness of the catchment's watercourses.

Naturalisation

4.5.3 London Plan Policy SI 17 supports development proposals which will restore rivers, including naturalisation. Local Plan Policy BGI1 also requires developments adjacent to the Blue Ribbon Network and other tributaries or waterways to contribute towards restoration and naturalisation of waterways.

4.5.4 In addition, Local Plan Policy BSUI3 seeks opportunities from the redevelopment of the functional floodplain to restore natural function and flood storage capacity. Restoring the natural function of the waterways will also bring biodiversity benefits and habitat enhancement.

4.5.5 London's waterways also provide community and recreational activities. In support of this, Local Plan Policy BGI1 requires all developments adjacent to the Blue Ribbon Network to improve access to the waterways, enhance its setting and provide an appropriate landscaped set-back.

4.5.6 In line with the EA's access requirement (Environmental Permitting (England and Wales) (Amendment) (No2) Regulations 2016), a minimum 8m set back will be required from certain developments near all rivers or tributaries. A permit may be required to secure access for maintenance and improvements such as re-naturalisation of riverbanks and habitat improvements.

Water Quality

4.5.7 The Brent Catchment Plan identifies opportunities for river restoration and water quality enhancement projects in support of the Thames River Basin Management Plan. Proposals located alongside waterways should consider how such projects and objectives can be supported and delivered in accordance with Local Plan Policy BGI1.

4.5.8 When considering opportunities to enhance water quality, the naturalisation of waterways, and the use of waterways for community and recreational activities, regard should be given to urban greening and supporting biodiversity in accordance with Local Plan Policy BGI1 and **Chapter 3** of this SPD.

4.6 Planning to Mitigate Impacts on Water Management

4.6.1 In assessing planning applications that impact on the management of water, the council will have regard to policies in the NPPF and relevant planning guidance, the London Plan and the Brent Local Plan. Other guidance will include relevant LPGs, Brent's Flood Management Strategy and Drainage Strategy, and this SPD.

4.6.2 The extent of detail required in supporting documents will depend on the scale, nature and location of the proposed development. The following assessments and their evidence base will be required depending on the type of development in specific Flood Zones outlined in (West London strategic flood risk assessment):

- Flood Risk Assessment (FRA);
- The Sequential and Exceptions Test;
- Drainage Strategy/Drainage Plan;
- A Water Efficiency Assessment;
- Water Quality Statement; and/or
- Other assessments: Land Contamination Assessment and Demolition and Demolition and Construction Management Plan.

Mitigation Measures

4.6.3 Major and minor developments, and change of use applications should incorporate the below measures, where relevant and proportionate to the scale of development:

a) Adjacent to the Blue Ribbon Network should improve access to the waterway, enhance its setting, provide an appropriate landscaped set-back, contribute to restoration and naturalisation, enhance water quality and biodiversity in accordance with the objectives of the Water Framework Directive and Thames River Basin Management Plan;
b) Protect and enhance existing moorings;
c) Achieve mains water consumption of 105 litres or less per person per day for residential development and commercial development to achieve at least BREEAM excellent standard for the 'Wat 01' water category or equivalent;
d) Incorporate water efficiency measures;
e) Assess – avoid – manage and mitigate flood risk over the lifetime of the development;
f) Minimise risk of flooding based on Flood Zone categorisation, including allowance for climate change flood level;
g) Address residual flood risk and not increase the risk of flooding elsewhere;
h) Adhere to flood risk vulnerability classification, ensure dry means of escape and achieve appropriate finished floor levels;
i) Redevelopment of sites in functional floodplain (Flood Zone 3b) to restore the natural function and storage capacity of the floodplain;
j) Adjacent to flood defences must protect the integrity of flood defences;
k) Where relevant, apply sequential test and pass the exceptions tests to ensure development is steered to areas with the lowest probability of flooding;
l) Use appropriate SuDS to control the rate and volume of surface water run-off;
m) Ensure separation of surface and foul water systems;
n) Make reasonable provision for the safe storage and passage of flood water in excessive events;
o) Minimise misconnections between foul and surface water networks;
p) Achieve greenfield run-off rates and ensure that surface water management in accordance with the drainage hierarchy;
q) Ensure adequate wastewater infrastructure capacity is provided;
r) Adequate arrangements for long-term management and maintenance of the measures used.

Flood Risk Assessment (FRA)

4.6.4 The council will assess FRAs having regard to the West London SFRA. The following development proposals will be required to submit a FRA:

a) Major, minor and change of use in Flood Zone 2 or 3;
b) More than one hectare (ha) in Flood Zone 1;
c) Major, minor and change of use in less than 1 ha in Flood Zone 1 proposing to a more vulnerable class and where they could be affected by sources of flooding other than rivers and sea (such as surface water drains, reservoirs);
d) Major, minor and change of use in a critical drainage area;
e) Risk of groundwater flooding and sewer surcharge/capacity issues.

4.6.5 For developments of less than 1 ha (10,000m²) the level of detail required in an acceptable FRA will depend on the size and density of build. It should include the risk of flooding from all sources of flooding, information obtained from the EA, water company or sewerage undertaker, other relevant statutory authorities, site investigation and recommended mitigation measures.

4.6.6 Applicants should utilise the West London SFRA Flood Risk Assessment Submission Checklist to ensure that all mandatory requirements have been met within their FRA. This is in addition to checking whether their proposed site has already been assessed within Brent's Strategic Flood Risk Assessment Level 2. If it has, the findings of the relevant site assessments (including mitigation requirements and planning conditions) within the SFRA Level 2 Appendix B must be referred to and addressed within their FRA, and through the design of the proposal.

4.6.7 Applicants should also check whether their site has been considered within Brent's Sequential and Exception Test (September 2020), in particular Figure 4, to ascertain whether parts of the exception test (if eligible) need to be demonstrated within a site specific FRA.

4.6.8 Mitigation measures will be considered by site basis depending on its circumstances and FRA conclusions. For relevant sites, mitigations identified within Brent's SFRA Level 2 must be utilised.

4.6.9 Climate change allowances for peak river flow and rainfall intensity will be expected to be included in FRAs. The PPG outlines which allowances should be used, including floodplain storage compensation. Defra have produced an interactive map that shows visually which climate change allowances should be used. The West London SFRA maps also show various climate change scenarios in relation to peak river flows (a 1 in 100 year probability event, plus various percentage increases in peak river flow).

The Sequential and Exceptions Test

4.6.10 The Sequential and Exception test will direct development towards areas at lowest risk of flooding.

4.6.11 The sequential test is required if:

a) Proposed development is in Flood Zone 2 or 3; and
b) A sequential test hasn't already been done for a development of the type you plan to carry out on your proposed site (e.g. through the Sequential and Exceptions Test 2020 to support the Local Plan).

4.6.12 The exception test is required if the sequential test has shown that it isn't possible to use an alternative site, and your development is:

a) Highly vulnerable and in Flood Zone 2;
b) Essential infrastructure in Flood Zone 3a or 3b; or
c) More vulnerable in Flood Zone 3a.

4.6.13 The sequential test has already been carried out for Site Allocations and Intensification Corridors within the Local Plan. Some of these sites/ corridors will still be required to show that the exception test has been passed.

4.6.14 The exception test requires applicants to show how flood risk will be managed on the proposed site, how sustainability benefits of the site outweigh the flood risk, how development will be safe for its lifetime taking into account the vulnerability of users and that it will not increase flood risk elsewhere.

4.6.15 Applicants should refer to Figure 4 of Brent's Sequential and Exception Test (September 2020) to be clear on which parts of the exception test need to be demonstrated within a site specific FRA. Applicants may also refer to the Integrated Impact Assessment of the Brent Local Plan to identify wider sustainability benefits of their site.

4.6.16 For proposals that are not within Local Plan Site Allocations and therefore require a sequential test, the PPG provides information on how the sequential test (and exception test, if required) should be carried out. There is a degree of local discretion and applicants should agree the relevant search parameters and area of search with the council at pre-application stage using the methodology summarised below:

Step 1: Identify parameters of the proposal and the site. These will define whether other reasonably available sites would be appropriate for this proposal. For example: number of dwellings, density / capacity, whether a development of this type is specifically required to be in this location (e.g. a school or a doctors' surgery requiring a particular catchment area, or another local need), any other relevant information on choosing this particular site

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Step 2: Produce a map and a clear description and justification of the area of search. e.g. growth areas, town centres, the whole borough

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Step 3: Provide an explanation or justification of any other search parameters e.g. size/capacity

↓

Step 4: Review of alternative sites identified within the area of search, including analysis on whether site is suitable or unsuitable, available or unavailable, and the level of flood risk

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Step 5: If there are no reasonably available alternative sites, the sequential test has been passed

Table 11: Sequential test methodology

Drainage Strategy / Drainage Plan

4.6.17 A Drainage Strategy/Drainage Plan will be required for all major, minor and change of use developments. All minor developments and change of use which modify existing surface water drainage will also require a Drainage Strategy. Applicants should utilise the West London SFRA Drainage Strategy Submission Checklist to ensure that all mandatory requirements have been met. This includes demonstrating the feasibility of each stage of the drainage hierarchy. Ground investigations may be required to confirm whether infiltration based SuDS are suitable.

4.6.18 If the proposal will not meet greenfield run-off rates then this must be justified within the strategy. SuDS calculations will be checked by the local authority using the Greenfield Runoff Rate Estimation Tool.

4.6.19 DiGDAT Sewer Mapping provides information on all Thames Water infrastructure within Brent and will be used to check external pipe works that proposals will be discharging to.

4.6.20 Applicants should check whether their proposed site has been assessed within Brent's Strategic Flood Risk Assessment Level 2. If so, the findings of the relevant site assessments (including mitigation requirements and planning conditions) within the SFRA Level 2 Appendix B should referred to and addressed within the drainage strategy and through the design of the proposal.

Water Efficiency Assessment

4.6.21 This evidences that the development will meet the target of 105 litres or less per head per day, excluding up to 5 litres for external water use, will be required for all proposals for residential development and commercial development.

Water Quality Statement

4.6.22 This is required where proposals involve physical modifications to a water body, and/or indirectly affect water bodies. Where relevant, the applicant should be able to explain how the proposed development would affect the relevant water body and how they propose to mitigate the impacts.

4.6.23 Applicants will be expected to mitigate impacts by contributing to the delivery of the emerging Thames River Basin Management Plan. If it is likely that the proposal would have a significant adverse impact on water quality then the assessment should form part of the Environmental Statement associated with the application and a more detailed assessment will be required. The PPG outlines the likely components of a more detailed assessment.

Land Contamination Assessment

4.6.24 This is required where the site has been identified as being at risk of contamination or development is proposed in close proximity to a potentially contaminated site. Where there is potential for water quality to be affected, this should be considered and addressed and appropriate mitigation measures proposed.

Demolition and Construction Management Plan

4.6.25 This may be required to minimise and mitigate against environmental impacts that may arise from development such as accidental pollution events and explain how surface water will be managed during construction.

4.7 Development Management

4.7.1 The following section aims to provide a clear and consistent approach for stakeholders to meet the borough's priorities in relation to water management. At each planning application stage, the following will be required:

- **Phased development:** Each phase should demonstrate through relevant assessments, compliance with the key policy considerations;
- **Outline applications:** All assessments to include an 'Implementation Plan' explaining how the key policy considerations will be secured at the detailed design and application stage. Planning conditions may secure revision to assessments as part of a Reserved Matters application;
- **Pre-applications:** Where relevant, early discussion with the Environment Agency/LLFA/Affinity Water/Thames Water/Canal and River Trust, a preliminary Flood Risk Assessment and Preliminary Drainage Strategy, Water Efficiency Strategy;
- **Full applications:** Where relevant, FRA, Drainage Strategy/Drainage Plan, Sequential and Exception Test, Water Efficiency Assessment, Water Quality Statement, Land Contamination Assessment, Construction Environmental Management Plan.

4.7.2 The planning mitigations for each type of proposed development are listed in the tables below. These set out measures for:

Major Development | **Minor Development**

Change of Use | **Permitted Development**

Major Development

A Address flood risks depending on site's Flood Zone and appropriate mitigation measures set out in a FRA;

B Where relevant, apply Sequential and Exceptions tests;

C Adjacent to flood defences, development should protect their integrity;

D Adjacent to the Blue Ribbon Network be appropriately designed and incorporate measures;

E Follow the drainage hierarchy;

F Achieve water efficiency standards for residential development and non-residential development;

G Provision of SuDS;

H Separate and minimise misconnections of surface and foul water systems;

I Achieve greenfield run-off rates;

J Submit FRA, Drainage Strategy/Plan, Water Efficiency Assessment, Water Quality Statement, Management and Maintenance Plan of the measures used;

K Based on site investigation, submit supporting documents such as Land Contamination Assessment and Demolition and Construction Management Plan.

Minor Development

L As above (A-K) where relevant and proportionate to the scale of development;

M Make use of sustainable drainage measures wherever feasible and ensure separation of surface and foul water systems, to be shown in a Drainage Plan.

Change of Use

N As above (A-K) where relevant and proportionate to the scale of development;

O Make use of sustainable drainage measures wherever feasible and ensure separation of surface and foul water systems, to be shown in a Drainage Plan.

Change of Use

P Prior Approval will be required to assess flood risk and contamination impacts;

Q If resulting in the creation of 10 or more residential dwellings, Thames Water or Affinity Water will need to be consulted to ensure no negative impacts on sewer capacity and water pressure.

4.8 Planning Conditions and Obligations

4.8.1 Measures in relation to the management of water may be secured through planning conditions. Conditions may take a number of forms depending on the nature of the development and the policy requirement triggers and the list below is not exhaustive.

4.8.2 Statutory consultees such as the Environment Agency, Canal and River Trust and the Lead Local Flood Authority may request conditions to be attached to permissions.

Planning Obligations

R Design phase:

- Where development may have an impact on the ecology of the Grand Union Canal and River Brent, prior to commencement, a CEMP including demolition plan, how surface water will be managed during construction, and pollution prevention and response plan to be submitted and approved;
- Where there are clean or waste water infrastructure concerns, development not to commence until strategies detailing on and / or off site works have been submitted and approved by the LPA in consultation with Thames Water. Phasing conditions may be applied if applicable;
- Where development may have an impact on the ecology of the Grand Union Canal and River Brent, prior to commencement, full details of proposed landscaping to be submitted and approved to ensure the character of the canal/river is maintained and to maximise biodiversity benefits;
- Ensure that any necessary off site flood storage compensation has been secured.

S Construction phase:

- For sites that require off-site upgrades to water and waste water infrastructure capacity, occupation to be aligned with the delivery of necessary infrastructure upgrades. Phasing conditions may be applied if applicable;
- Adherence to any measures outlined in the FRA and or CEMP.

Planning Obligations (continued)

T **Operational phase:**

- Arrangements to be in place for the ongoing maintenance of SuDS over the lifetime of the development;
- Mains water consumption not to exceed 105 litres per person per day (excluding an allowance of up to five litres for external water consumption), using a fittings-based approach to determine the water consumption of the development in accordance with requirement G2 of Schedule 1 to Building Regulations Part G;
- Safe access and egress to be maintained throughout the lifetime of the development.

4.9 Monitoring Requirements

4.9.1 The need to monitor water management will be determined on a case-by-case basis and will generally depend on risks from the development (for example, flood risk or water quality).

Monitoring

U Performance of attenuation/water retention measures to ensure no overland diversion to the surface water network;

V Performance of pollution separation systems.

5. Energy

5.1 Policy Overview

National Policy & Guidance
NPPF Paras 148, 151, 152, 153 and 154
DLUHC The Future Building Standards 2021 (draft)
BEIS Energy efficiency: Building towards net zero 2019
UKGBC The New Homes Policy Playbook 2021
RIBA Sustainable Outcomes Guide 2019
Good Homes Alliance

London Plan Policy & Guidance
London Plan Policy GG6 Increasing efficiency and resilience
London Plan Policy SI 2 Minimising greenhouse gas emissions
London Plan Policy SI 3 Energy infrastructure
London Plan Policy SI 4 Managing heat risk
Mayor of London LPG Energy Assessment Guidance 2022
Mayor of London LPG Carbon Emissions Reporting Spreadsheet 2022
Mayor of London LPG 'Be Seen' Energy Monitoring Guidance
Mayor of London LPG Whole Life-Cycle Carbon Assessments 2020
Mayor of London LPG Circular Economy Statement Guidance
LETI Climate Emergency Design Guide
RTPI and TCPA The climate crisis – A guide for Local Authorities on Planning for Climate change
RICS Whole life carbon assessment for the built environment 1st edition, November, 2017

Local Plan Policy & Guidance
Brent Local Plan Policy BSUI1 Creating a resilient and efficient Brent
Brent Climate and Ecological Emergency Strategy 2021
Brent Climate Resilience and Adaptation Plan 2022

5.1.1 The Climate Change Act 2008 establishes a legally binding target to reduce the UK's greenhouse gas emissions to net zero by 2050. Consequently, climate change mitigation has become one of the top duties of the planning legislation. The mitigation hierarchy of achieving a net zero carbon home involves:[20]

a) Reducing energy demand by optimising the efficiency of the building fabric;
b) Reducing embodied carbon by driving down the carbon impacts related to product and construction stages;

c) Low or zero carbon energy supply by encouraging on-site generation of low carbon heat and hot water;
d) Measuring and verifying in-use performance by closing the gap between modelled and actual energy performance; and
e) Addressing the shortfall in achieving net zero carbon emission through off-site mitigation.

5.1.2 The government is introducing the Future Homes Standard (new dwellings) and Future Building Standards (non-domestic buildings) to increase energy efficiency requirements by 2025. It sets reduction targets and prioritises a fabric first approach to ensure high thermal performance of the building envelope. The Future Homes and Building Standards complements the Building Regulations that set the statutory requirements for buildings including energy.

5.1.3 In June 2022, updates to Building Regulations Part L (Conservation of fuel and power) and Part F (Ventilation) came into effect, as well as a new Part O (Overheating).

5.1.4 To comply with the net zero carbon target for London, London Plan Policy SI 2 requires all major developments to maximise on-site carbon reductions by following the energy hierarchy. The GLA's Energy Assessment Guidance provides guidance on how Policy SI 2 should be applied.

5.1.5 The council, in line with Policy SI 2's energy hierarchy, prioritises developments that adopt passive design principles and a fabric first approach. Once the design and fabric of new development has minimised the energy needed for heating, cooling and power, the residual energy should be supplied as efficiently as possible using the energy hierarchy.

5.1.6 Local Plan Policy BSUI1 Creating a Resilient and Efficient Brent focuses on more specific local requirements to support Policy SI 2. It requires the establishment of District Heating Networks (DHNs) within the Growth Areas of Neasden Stations, Northwick Park and Staples Corner. New major development in the remaining Growth Areas (Alperton, Burnt Oak & Colindale, Church End, South Kilburn and Wembley Park) will be expected to develop DHNs depending on the size and location of the proposal.

5.1.7 In addition, Policy BSUI1 requires all major developments to connect to a DHN. In cases where this is not feasible, in the first instance there will be a requirement to contribute towards the establishment of a DHN. If demonstrated that such provisions are not achievable, the heating systems will need to be 100% renewable energy technology.

5.1.8 The Brent Local Plan encourages all minor developments to maximise sustainable measures, including renewable energy generation, reducing overheating and providing efficient cooling. Passive design principles and fabric first approach can be beneficial and reduce operational costs in the long run.

5.2 Key Policy Consideration: Energy Hierarchy

5.2.1 Central to policy requirements is the hierarchical approach to supplying energy efficiently to reduce associated carbon emissions. The energy hierarchy 'Be Lean, Be Clean, Be Green and Be Seen', as set out in London Plan Policy SI 2 is a sequence of steps that outline ways to achieve zero carbon emissions. Each step should be accurately assessed by an accredited energy assessor and demonstrated in supporting documents.

5.2.2 The following energy hierarchy requirement is set for all major developments and strongly encouraged for minor developments:

Be Lean: Minimise Energy Demand

5.2.3 The design of buildings can play a significant role in reducing overall energy demand. This is achieved through improved performance through fabric first measures and incorporating passive design principles.

5.2.4 **Table 12** and **Table 13** list the passive principles and fabric first approach that developments should consider.

5.2.5 In addition to 'fabric first', passive principles (see **Table 12**) are standards devised in Europe (formally known as PassivHaus/Passive House) that are considered the pinnacle of a sustainable building. This methodology ensures minimal heating loads and maximises passive solar whilst minimising overheating. The methodology also considers indoor air quality. Using passive principles are key to reducing energy demand in the first instance.[21] It reduces heating and cooling to a minimum whilst creating high air quality. Passive principles should be fully utilised before active systems[22] and energy saving technology is explored. In order to maximise the benefits of passive principles, these need to be considered at the early stages of design.

5.2.6 Proposals should demonstrate compliance with targets using a calculation methodology such as SAP (Standard Assessment Procedure) or PHPP (Passivhaus Planning Package) for residential development. Proposals for non-residential developments should utilise one of the approved NCM (National Calculation Methodology) depending on the building type. These will assist in evaluating operational energy use at design stage.

5.2.7 This step should be in line with the performance targets for major developments. In accordance with the GLA's Energy Assessment Guidance, residential developments should achieve at least a 10% improvement and non-residential developments at least a 15% improvement over Building Regulations Part L for fabric measures alone. The methodology for this is set out in the GLA guidance.

5.2.8 Major non-residential developments are also required to achieve a BREEAM rating of Excellent. BREEAM must be considered early in the design process to maximise the score. BREEAM includes mandatory minimum energy targets in order to achieve an 'Excellent' rating.

Passive principles relate to internal and external location, orientation and design to reduce energy consumption		
No.	**Key objective**	**Key considerations**
1	Site layout and relationship between buildings and adjacent uses	• Maximise the potential for passive solar gain whilst avoiding excessive solar gain in the summer; • Avoid the over-shadowing of the solar orientation of buildings; • Use landform and landscape to provide shelter to minimise heat losses in winter and adequate solar shading in summer;
2	Building orientation and form	• Minimise heating, lighting and cooling demands by use of building axis and building form; • Consider building use and solar gain demand from residential and non-residential; • Avoid overheating in summer through design approaches such as eave design to allow shading or use of green infrastructure;
3	Provide thermal mass and storage	• Consider materials that have a capacity to absorb and store heat and ultimately release it when it is cooler;
4	Provision of natural ventilation	• Enable the flow of external air to an indoor space as a result of pressure or temperature differences;
5	Planting and soft landscaping	• Include vegetation, trees, green roofs, green walls.

Table 12: List of passive principles

'Fabric first' approach relates to the components and materials that make up the building fabric that need to reduce energy waste		
No.	**Key objective**	**Key considerations**
1	Continuous insulation	• Insulating material that is continuous across all structural members without thermal bridges other than fasteners and service openings. It is installed on the interior or exterior or is integral to any opaque surface of the building envelope;
2	Avoid thermal bridging	• Reduce heat loss through wall joints and material;
3	Airtightness	• Airtight envelope to be draught-free through minimising gaps in the fabric by sealing joints and gaps around windows and door frames meeting airtightness targets;[28]
4	Ventilation and air permeability	• Reducing air permeability through controlled ventilation to minimise build-up moisture, other pollutants and provide clean filtered air; • Mix of natural and mechanical ventilation with heat recovery system;
5	Energy efficiency	• Energy efficient lighting and appliances.

Table 13: 'Fabric first' approach

Be Clean: Supply Energy Efficiently

5.2.9 This stage requires developers to supply energy efficiently including consideration of heating and cooling. This step will have to demonstrate connection (or provision for future connection) to heating networks. This is achieved through the use of communal heating systems where a district heat network is not currently available.

5.2.10 Proposals will need to include future proofing measures unless it has been demonstrated that it is not feasible and viable to do so. The provision has to be in line with the heating hierarchy (see **Section 5.5**) as set out in London Plan Policy SI 3 and the cooling hierarchy set out in London Plan Policy SI 4 (see **Section 5.6**).

5.2.11 Developments should consider their Be Clean strategy following this hierarchy:

a) Connect to a local existing or planned heat network. Where there is an existing network, new developments should prioritise connection provided that:

- The network does not exceed the CO2 emission and primary energy factor limits set out in Building Regulations Part L; and
- The network operator has agreed a decarbonisation strategy with the GLA and the relevant borough, or is in the process of doing so;

b) Use zero-emission and/or local secondary heat sources (in conjunction with heat pump, if required);
c) Use low emissions combined heat and power (CHP) – only where this is to enable the delivery of an area-wide heat network. To date, gas-engine CHP has been the primary technology for facilitating the development of district heat networks due to its high efficiency and better carbon performance compared to electrical systems utilising grid electricity. However, the rapid decarbonisation of the electricity grid means that technologies generating on-site electricity (such as gas-engine CHP) will not achieve the carbon savings they have to date. There are also growing air quality concerns associated with combustion-based systems;
d) Use ultra-low NOx gas boilers - a heating strategy led by ultra-low NOx gas boilers should only be considered where it can be clearly demonstrated that all of the above options (a to c) have been fully investigated and ruled out with sufficient evidence provided.

Be Green: Use of Renewable Energy and Technologies

5.2.12 This stage requires developers to supply the residual energy through incorporation of technology that obtains energy from renewable sources. The electricity producing technology include wind (wind turbines), water (hydro-electricity) or sun (solar panels or photovoltaic). Heat producing technology includes Air Source Heat Pumps (ASHP), Ground Source Heat Pumps (GSHP) and Biomass fuelled boilers.

5.2.13 For heat producing technologies which require non-renewable energy input (such as ASHP connected to grid electricity), the energy obtained from the grid should be offset with the use of on-site renewables as far as practicable and feasible.

5.2.14 **Table 14** sets out types of energy technology and the relevant considerations:

Energy type	Technology	Description	Technology considerations
Electricity	Solar Photovoltaic	Use of solar cells to convert energy from the sun into electricity. Need energy storage for surplus energy unused	• Preferably south-facing, (however PVs can operate at any orientation) and optimal angle 30 degrees • Availability of space to mount the equipment • Degree of shading from trees or other buildings • Visual impact • Amenity space impact • Heritage asset issue • Include the potential for storage on-site
Electricity	Wind	Use of wind to generate electricity	• Wind speed • Noise/vibration implications • Space considerations • Distance from noise-sensitive receptors
Electricity	Small Scale Hydro	Uses kinetic energy in flowing water to turn a turbine and generate electricity	• Sufficient water flow and velocity • Sited close to point of use or to suitable grid connection • Visual and noise impact • Effects on wildlife • Air and water quality • Various consents and licences may apply

Energy type	Technology	Description	Technology considerations
Heat	Solar water heating system	Uses heat from the sun to warm domestic hot water that is stored in a tank. A conventional boiler or immersion heater is then used to provide hot water when solar energy is unavailable	• Near south-facing roof based collector • Degree of shading from trees or other buildings • Level of demand for hot water • Storage capacity to maximise the capture of solar energy • Visual impact • Heritage asset impact
Heat	Ground source heat pumps	The heat from the ground is absorbed by the liquid that is pumped through the buried pipes. Requires pipes to be buried horizontally or vertically in the ground by at least 2m	• Soil suitability • Land availability for number of bore holes required (or land availability for horizontal pipework) • Space between boreholes • Distance from boreholes to heat plant • Heat pumps can operate in heating and cooling mode
Heat	Air source heat pumps	Absorb heat from the outside air and can extract heat from the air. Require a heat exchanger to be located on the outside of a building	• Close to point of use • Visual impact • Noise impact • Ecological and landscape impacts • Heritage asset impact • Heat pumps can operate in heating and cooling mode

Energy type	Technology	Description	Technology considerations
Heat	Water source heat pumps	Absorb heat from, usually flowing water and can extract heat from the water	• Sufficient water flow • Minimise impact on wildlife • Heat pumps can operate in heating and cooling mode.
Heat	Biomass boilers and stoves[29]	Uses organic materials and biodegradable material, either directly from plants or indirectly from industrial, commercial, domestic or agricultural products	• Availability of locally sourced biomass • Availability of internal or external storage space to store biomass products • Compliance of biomass fuel with current legislation to ensure air quality and amenity is not adversely impacted • Ecology impacts • Limitation to genuine waste products
Heat	Biofuel systems	Uses waste products such as used cooking oil and waste fats from industry (such as animal processing)	• Availability of locally sourced biofuel • Limited to genuine waste products. Primary biofuels derived from crops would not be acceptable • Compliance with legislation for air quality and other considerations of biofuels

Table 14: Energy technology requirements for 'Be Green'

Be Seen: Monitor and Report Performance

5.2.15 To monitor operational energy performance of buildings, at least five years' post-construction reporting is required via the GLA's monitoring portal. The 'Be Seen' energy performance guidance LPG sets out identifying a 'responsible party' for each stage and the performance indicators. Reporting is required at planning stage (RIBA 2/3), as-built stage (RIBA 6) and in-use stage using the Reporting template.

Reporting

5.2.16 The mix of options selected through the energy hierarchy should be supported by evidence of the options appraised and associated detail on the chosen option. Major developments should submit this information in the Energy Strategy (see **Section 5.8**). The approach should subsequently be summarised in the Sustainability Statement.

5.2.17 Minor developments are required to submit adequate information in the Design & Access Statement that shows the proposals have maximised efforts towards reducing carbon emissions.

5.2.18 Once the on-site measures through the energy hierarchy have been maximised and the residual energy mitigation proven unviable, any shortfall is to be paid as a cash-in-lieu contribution into the council's Carbon Offset Fund. A carbon offset price is recommended at:

Calculation: $S = (T - R) \times Y \times Z^{30}$

S= Sum payable (CO_2e), T = Energy targets, R = Reduction of CO_2 in tonnes CO_2/annum, Y = 30 years, Z = Cost of carbon per tonne at time of submission being £95/tonne CO_2 (2022)

5.3 Key Policy Consideration: BREEAM and Other Accreditations

5.3.1 The Building Research Establishment Environmental Assessment Method (BREEAM) is a mandatory sustainability accreditation for schemes proposing non-residential uses. An accredited assessor undertakes this and credits are awarded across a range of topics and a final accreditation is awarded from good to excellent. Local Plan Policy BSUI1 requires non-residential development of 1,000sqm or more to achieve an 'excellent' rating.

5.3.2 To demonstrate the appropriate BREEAM level can be achieved, the following should be submitted with an application undertaken by an accredited assessor:

Step 1: Preparation: Submit BREEAM Preliminary Assessment Report at planning application stage

Confirming project registration, scope of work, intial design SBEM calculation, technical details of proposed system(s), saving calculation summarised in an Energy Strategy

↓

Step 2: Design: Submit an Interim BREEAM Certification

Confirming production information, tender doscumentation and actions prior to construction

↓

Step 3: Construction: Submit Post-Construction Assessment

Informed by any modification and construction to practical completion

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Step 4: Post-Construction final review: Submit a BREEAM Certification, HQM and/or Passivhaus certificate

Confirmation that the completed development has met the required ratings must finally be provided prior to occupation of the building

Table 15: BREEAM certification methodology

5.3.3 Where feasible, developments deemed are actively encouraged to pursue accreditation with:

Accreditation	
A	BREEAM New construction which relates to individual buildings
B	BREEAM Communities for development on a wider scale
C	BREEAM Refurbishment and Fit out for residential and non-residential existing building developments including conversions
D	BREEAM Net zero carbon
E	BREAAM Whole Life Performance
F	Passivhaus (new built)
G	Passivhaus EnerPhit (building retrofit)
H	Home Quality Mark

Table 16: List of relevant accreditations

5.4 Key Policy Consideration: Building Regulations Part L

5.4.1 London Plan Policy SI 2 requires major developments to calculate and minimise all carbon emissions from any part of the development. This includes:

a) **Regulated emissions:** those captured by the Building Regulations associated with energy consumed in the operation of the space (e.g. heating, cooling, hot water, internal lighting); and
b) **Unregulated emissions:** not captured by the Building Regulations and are emissions from other parts of the development (e.g. process waste, electrical appliances, cooking appliances and other small power such as lifts, IT equipment, refrigerators, external lighting).

Regulated Emissions

5.4.2 Developments are now subject to the amended Building Regulations Part L that came into force on June 2022. It is the government's step towards The Future Buildings Standard to achieve zero carbon ready homes by 2025.

5.4.3 The Building Regulations help ensure that new buildings, conversions, renovations and extensions (domestic or commercial) are going to be safe, healthy and high performing. Developments are expected to adhere to the Building Regulations as set out within the Approved Documents. However, this section only expands on Part L, Part F and Part O, which relate to the London Plan policies on energy.

5.4.4 Building Regulations Part L covers the 'conservation of fuel and power' and establishes how energy-efficient new and existing homes should be. It requires a mandatory 35% cut in carbon dioxide emissions. To do so, a standard specification has been created identifying fabric and building services used in the notional building. The Future Homes Standard aims to progress to an overall 75% uplift by 2025.

5.4.5 London Plan Policy SI 2 uses the calculation methodology in Building Regulations Part L. Policy SI 2 requires developments to achieve zero carbon with a minimum 35% reduction with a push to exceed 50% reduction based on the calculations in Part L.

5.4.6 Part L is separated into various volumes:

- Part L1A – New Dwellings
- Part L1B – Existing Dwellings
- Part L2A – New buildings other than dwellings
- Part L2B – Existing buildings other than dwellings

Building Regulations Part L	Requirement	Targets
Part L1 (a)	Limits heat gains and losses for new homes through building fabric	• U-values (W/(sqm·K) • Continuity of insulation • Thermal Bridging • Airtightness
Part L1 (b) and Part L (2)	Fixed building services energy efficiency and controls and on-site generation of electricity	• Fixed building services for heating and hot water systems (size and control) • Any on-site electricity generation services for heating and hot water systems (size and control) • Follow system specific guidance • Underfloor heating systems • Comfort cooling • Lighting

Table 17: Requirements of Part L of the Building Regulations

5.4.7 It should be noted that the targets represent minimum standards for the individual elements. A dwelling would need to significantly exceed most of them in order to achieve the expected as-built performance.

5.4.8 Part L includes limiting values but compliance is based on a notional specification. In order to meet the required standards, developments will need to exceed the notional standards. See the LETI Climate Emergency Design Guide and the UKGBC's The New Homes Policy Playbook 2021 for further guidance.

5.4.9 Major development proposals should set out, as far as practicable, in their Energy Strategy and Sustainability Statement how the development will perform against the energy efficiency requirements. Information on the following will be particularly relevant:

- Nature of proposed heating system;
- U-values for parts of the building envelope (i.e. walls, floor, roof, doors, windows); and
- Comparison of energy calculations using the GLA's Carbon Reporting Spreadsheet.

Unregulated Emissions

5.4.10 Unregulated emissions are established by using the BRE Domestic Energy Model (BREDEM),[23] Passivhaus Planning Package (PHPP), HQM or similar methodology. The calculation of unregulated carbon emissions should be done as part of the compliance with the 'Be Green and Be Seen' part of the energy hierarchy. Unregulated emissions do not contribute to the BER/ TER, but are still required to be calculated and reported through Energy Use Intensity (EUI) measure of the total energy consumed in a building annually.

5.4.11 The Energy Strategy must clearly identify the unregulated energy uses of the development. The reporting for total energy demand must separately list 'unregulated electricity', 'unregulated gas' and 'unregulated process waste' for both residential and non-residential uses proposed.

5.5 Key Policy Consideration: Heating Hierarchy

5.5.1 London Plan Policy SI 3 requires the heating hierarchy to be considered while considering the design proposal for major developments against 'Be Clean' part of the energy hierarchy. The focus is stepping away from gas and onto zero on-site emission heat sources. The heating hierarchy requires alternative technologies to be considered before assessing the viability of CHP. The heating hierarchy should be followed as per the requirements of Policy SI 3.

5.6 Key Policy Consideration: Cooling Hierarchy

Cooling

5.6.1 London Plan Policy SI 4 requires the cooling hierarchy to be considered during the design of major developments against 'Be Clean' part of the energy hierarchy. In addition to what is set out in the policy, development is expected to reduce overheating risk through following the steps in the cooling hierarchy. The Energy Strategy must clearly demonstrate how the cooling hierarchy has been followed.

Overheating

5.6.2 Development (including refurbishment) is expected to reduce overheating risk through following the steps in Building Regulations Part O compliance and cooling hierarchy. Natural light is usually necessary to provide a pleasant environment and reduce energy demands. Building layouts should however, be designed taking into account other factors such as overheating. Measures to consider to prevent overheating include:

a) A balance between solar gain/daylighting;
b) Provide adequate means to remove heat from indoors through cross ventilation, ventilation louvres in external walls or mechanical ventilation systems;
c) Incorporate shading measures, overhang balconies, louvres, external blinds, shutters and awnings;
d) Shading designed to take into account the angle of the sun and the optimum daylight and solar gain;
e) High performance glazing;
f) Mechanical cooling may only be used where removal of insufficient heat is from the indoor environment is challenging.

5.6.3 Early design stage Overheating Risk Analysis will be expected to be carried out to identify key factors contributing to overheating risk. Where developments are at risk of overheating, additional detailed assessment and mitigation measures will be expected to be incorporated and set out in an Overheating Mitigation Strategy.

5.6.4 This will include Building Regulations Part O (Overheating) compliance tools and Dynamic Thermal Modelling (DTM) to demonstrate that any risk to overheating has been mitigated. DTM should be carried out in accordance with Part O and/or CIBSE TM59 Modelling. Developments will also be encouraged to follow the GLA's Design Summer Years for London (TM49: 2014) which provide guidance on futureproofing impacts of overheating from climate change.

5.6.5 Part O requires a non-technical Home User Guide being given to owners, containing maintenance requirements so that the implementation of the Overheating Mitigation Strategy is effective.

5.6.6 The council will support alternative assessment tools and standards including HQM and passive principles covering overheating, cooling and summer comfort. The Energy Strategy must clearly demonstrate how the overheating risk has been mitigated.

Ventilation

5.6.7 Building Regulations Part F (Ventilation) sets out system specific requirements and performance targets to maintain indoor air quality through adequate means of ventilation. There are two approved documents: Volume 1 (Dwellings) and Volume 2 (Buildings other than dwellings). Measures to consider to provide ventilation include:

a) Extracting water vapour and indoor air pollutants from areas where they are produced in significant quantities (e.g. kitchens, utility rooms and bathrooms);
b) Supplying a minimum level of outdoor air for occupants' health;
c) Rapidly diluting indoor air pollutants, and dispersing water vapour when necessary in habitable rooms;
d) Minimising the entry of external air pollutants;
e) Producing low level of noise;
f) Easy access for maintenance;
g) Providing protection from cold draughts;
h) Location of exhaust outlets;
i) Providing protection from rain; and that
j) Ventilation should be controllable (manual or automatic).

5.6.8 There are various types of ventilation: Natural, Mechanical and Hybrid (mixed mode). Ventilation rates should be in accordance with Part F.

5.6.9 This should be addressed in the Ventilation Strategy and Extraction Statement (see **Chapter 8**) Targets for intermittent and continuous extract ventilations are set out in Part F.

5.7 Key Policy Consideration: Whole Life-Cycle Carbon Emissions (WLC)

5.7.1 London Plan Policy SI 2 (F) requires planning applications referable to the GLA to prepare a Whole Lifecycle Carbon (WLC) Assessment in line with the WLC Assessment LPG. Applications for major developments are also encouraged to undertake the assessment, specifically where demolition is being considered.

5.7.2 WLC emissions relates to the sum total of all building-related emissions over a building's entire life. It uses the British Standard BS EN 15978:2011 (Sustainability of construction works - Assessment of environmental performance of buildings - Calculation method).

5.7.3 The WLC approach will:

a) Ensure carbon emissions are accounted for and support net zero emissions targets;
b) Achieve material resource efficiency, local sourcing, short supply chain, cost savings and reduce waste;
c) Identify carbon savings from recycling and support circular economy;
d) Encourage a 'fabric first' approach;
e) Ensure best solutions to reduce operational and embodied emissions;
f) Identify long-term impacts of maintenance, repair and replacement; and
g) Encourage longevity through durable construction and flexible design.

5.7.4 It should be demonstrated using the GLA's WLC Assessment template and record the subsequent actions taken to reduce emissions at each life-cycle stage. This information should be submitted to the GLA at each planning stage. The assessment should quantify the 60 years' impact of the development proposal in different life cycle modules following the 16 key principles (listed in **Table 18**) followed by the actions taken to reduce emissions. The life-cycle modules[24] include:

- **Module (product sourcing and construction stage):**
  A1-A3 Product stage, A4 and A5 Construction process stage: transport to site and construction installation process;

- **Module (use stage):**
  B1 Use, B2 Maintenance, B3 and B4 Repair and replacement, B5 Refurbishment, B6 Operational energy use, B7 Operational water use;

- **Module (end-of-life stage):**
  C1 Deconstruction and demolition process; C2 Transport, C3 Waste processing for reuse recovery or recycling, C4 Disposal;

- **Module (benefits and loads beyond the system boundary):** D Benefits and loads beyond the system boundary.

No.	WLC Principle	Relevant life-cycle module
1	Reuse and retrofit of existing built structures	A1-A5, B1-B6, C1-C4, D
2	Use repurposed or recycled materials	A1-A5, B1-B5, C1-C4, D
3	Material selection	A1-A5, B1-B5, C1-C4, D
4	Minimise operational energy use	A1-A5, B1-B4, B6
5	Minimise the carbon emissions associated with operational water use	A1-A5, B1-B4, B6, C1-C4, D
6	Disassembly and reuse	A1-A5, B1-B5, C1-C4, D
7	Building shape and form	A1-A5, B1-B6
8	Regenerative design	A1, B1, D
9	Designing for durability and flexibility	A1-A5, B1-B5, C1-C4, D
10	Optimisation of the relationship between operational and embodied carbon	A1-A5, B1-B6
11	Building life expectancy	A1-A5, B1-B5, C1-C4, D
12	Local sourcing	A1-A5, B3-B5
13	Minimising waste	A1-A5, B1-B7, C1-C4, D
14	Efficient construction	A1-A5, B1-B7, C1-C4, D
15	Lightweight construction	A1-A5, B1-B7, C1-C4, D
16	Circular economy	A1-A5, B1-B7, C1-C4, D

Table 18: Whole life cycle principles and life cycle modules

5.7.5 The adapted approach will identify the overall best combined opportunities for reducing the lifetime consequences of the development relating to carbon emissions.[25] The following process should be undertaken by an accredited assessor:

Step 1: Initial design stage: To establish a baseline carbon estimate:

- Adopt third-party quality assurance
- Set WLC targets (see WLC Assessment LPG: Appendix 2 for benchmarks)

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- Demonstrate WLC principles and life-cycle modules built into project brief and align with the proposal's Energy Strategy and Circular Economy Statement

Step 2: Pre-application: Submit the GLA template and all pre-app documentation to provide details on:

- Existing building structure condition and other options explored before demolition
- Carbon emissions associated with pre-construction demolition (standard assumption of 50kgCO2e/sqm to the GIA of the existing areas)
- Estimate percentage incorporating existing structure
- Demonstrate WLC principles
- Align with Energy Strategy and Circular Economy Statement

Step 3: Planning application: Submit the GLA template to confirm details and form baseline carbon estimate:

- Project details and software tool used, Environmental Product Declarations (EPDs) used
- Confirmation that assessment accounts for minimum 95% of capital cost allocated
- Estimated total WLC emissions (kgCO2e and kgCO2e/sqm GIA) for each life-cycle module
- Report total WLC emissions against the WLC benchmarks
- Other options explored before demolition
- Carbon emissions associated with pre-construction demolition (standard assumption of 50kgCO2e/sqm to the GIA of the existing areas)
- Estimate percentage incorporating existing structure
- Summary of key actions to achieve the WLC emission reductions
- Opportunities to reduce the development's WLC emissions further Completion of the 'material quantities and end-of-life scenarios' table and align with the 'Bill of Materials' table produced as part of the Circular Economy Statement
- Completion of the 'GWP of all life-cycle modules' table (Module C3 and D informed by Circular Economy Statement, Module B6 informed by the 'Be Seen' LPG

↓

Step 4: Post Construction: To provide the actual 'as built' carbon footprint at practical completion, submit the GLA template as secured via planning condition prior to occupation of the development:

- Update of the information provided at planning submission stage
- Update the WLC calculation results for all modules based on the actual materials, products and systems
- Comparison of the post-construction results with the WLC emissions baseline reported at planning submission stage and an explanation for the difference
- Latest design changes and available cost plan
- Comparison of the post-construction results with the WLC emissions benchmarks and an explanation for the difference
- Summary of lessons learnt
- Evidence: site energy use record, contractor confirmation of as-built material, record of material delivery, waste transportation, list of product specific EPDs installed.

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Step 5: GLA Assessing: Scrutinise submission against the WLC Assessment LPG for completeness, technical quality, reduction in WLC emissions, and level of ambition

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Step 6: Future improvement: Applicants are encouraged to submit their WLC assessments to the Built Environment Carbon Database

Table 19: Whole life cycle methodology

5.7.6 Whole life carbon savings for a project can only be quantified and claimed when whole life carbon assessments have been carried out at a minimum of two different points in time. In summary, it is calculated as:

Calculation: WLC Emissions = E + R + U + M

E= Embodied emissions, R = Regulated emissions, U = Unregulated emissions, M = Maintenance and replacement emissions

5.8 Planning to Mitigate Energy Infrastructure

5.8.1 When submitting proposals for a major development, supporting evidence alongside planning applications must be submitted on how requirements on energy efficiency have been met. The supporting documents are submitted at various stages of development:

- **Stage 1:** Preliminary Energy Strategy and Energy Strategy must be submitted with major development planning applications. Minor developments to address this in Design & Access Statement
- **Stage 2:** Energy Assessment must be submitted at completion stage
- **Stage 3:** Energy Statement submitted post occupation.

Major Development

Step 1: Consider each stage of the energy hierarchy and achieve net zero carbon emissions on-site

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Step 2: Prepare an Energy Strategy to quantify the total reduction: energy hierarchy, heating hierarchy, cooling hierarchy, demonstrate compliance with passive principles and BREEAM

↓

Step 3: Align with the scheme's WLC Carbon Assessment, Air Quality Assessment and Travel Plan

↓

Step 4: Off-set any residual carbon emissions through financial contribution towards the Carbon Offset Fund

↓

Minor Development

Step 1: Consider each stage of the energy hierarchy

Step 2: Address in the Design & Access Statement what stages have been considered and their viability including energy hierarchy, heating hierarchy, cooling hierarchy, compliance with passive principles and BREEAM

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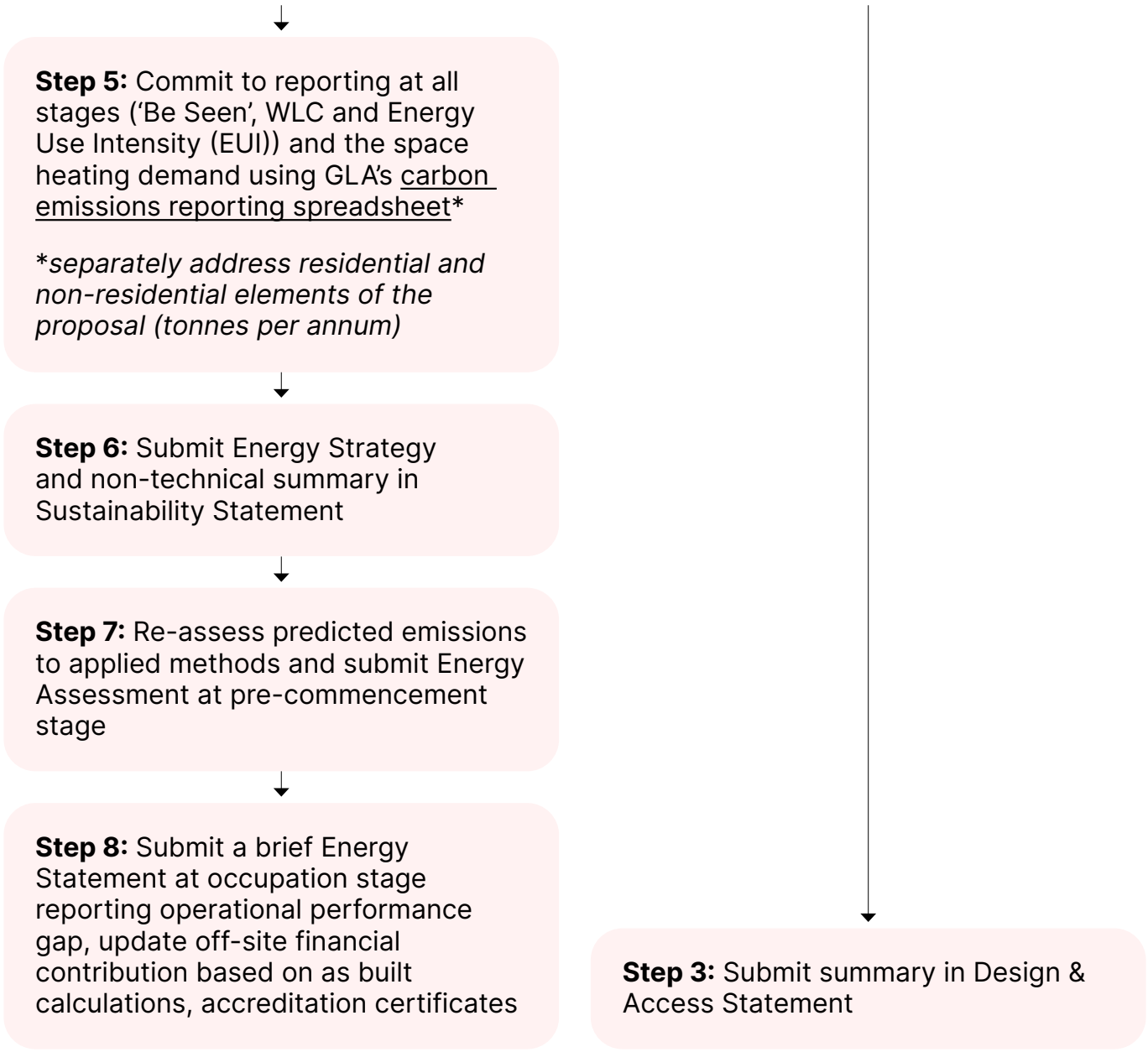

Table 20: Energy Strategy methodology

Energy Strategy

5.8.2 An Energy Strategy is required to include the following information and be carried out by an accredited assessor as a minimum:

a) Proposal details: number of each different type of residential unit, GIA (sqm), non-residential use floor area (sqm);
b) Baseline regulated energy consumption: calculating using Building Regulations Part L calculations (SAP) for residential and non-residential developments;
c) Baseline un-regulated energy consumption: calculating using the BREDEM-12 tool for residential developments. For non-residential developments estimated using CIBSE benchmarks;

d) Provide the benchmark/relevant targets used;
e) Energy efficiency measures: details of incorporated measures for each stage of the energy hierarchy;
f) Specific details: building material U values, thermal mass estimation, and thermal bridging calculations ratings of electrical appliances
g) Energy supply: Address all technologies explored, reasoning on suitability/unsuitability and chosen options. As a minimum specify: proposed system size, location, estimated energy generation, estimated CO2 savings, site-specific design requirements, incorporation of smart meters, maintenance requirements and estimated lifecycle;
h) Example formats for simple tables containing data are given in GLA's Energy Assessment Guidance 2022;
i) Estimated offset payment to the Carbon Offset Fund. Provision should be made to update this based on as built calculations;
j) A non-technical summary: outlining the contribution of each set of measures adopted based on energy hierarchy and meeting relevant targets. Where it has not been possible to reach the target, a clear explanation should be provided;
k) Consistent approach: such as energy strategy, overheating report and ventilation statement to share the same inputs.[26] These strategies should also take into account acoustic report and air quality assessments;
l) A plan for monitoring and annual reporting of energy demand and carbon emissions post-construction for at least five years; and
m) Accreditation: demonstrate that relevant accreditation can be achieved on the proposed scheme and commit to submitting proof at completion.
n) Other considerations should include provision of drying space or equipment and home office space and services.

5.8.3 For development applications that include a DHN connection or future proofing measures, the following information is expected in addition to that already required above:

a) A plan showing the pipe route and connection point to wider network;
b) High level technical specification;
c) Date of implementation and connection;
d) Details of financial contributions;
e) Feasibility and viability assessment;
f) Utility operator to undertake installing, operating and maintaining; and
g) Energy statement demonstrating carbon and energy savings.

Supporting Documents

5.8.4 Proposals for major developments must provide the following supporting documents with their evidence base:

- A **Sustainability Statement** to:
  - Include GIA (sqm), number of each different type of residential unit, and non-residential floorspace;
  - Summarise the energy hierarchy approach;
  - Set out key measures to carbon reduction;
  - Identify any shortfall on-site carbon reductions; and
  - Identify any contributions to a Carbon Offset Fund;

- An **Energy Strategy** and **Energy Assessment** to include:
  - A detailed appraisal of energy hierarchy, heating hierarchy and cooling hierarchy considerations and key measures adopted for carbon reduction (both regulated and unregulated emissions);
  - A BREEAM preliminary assessment;
  - A BREEAM Interim certification;
  - Any identified shortfall on-site carbon reductions;
  - Building Regulations Part L calculations;
  - Fabric U-value calculations;
  - A Carbon Emissions Reporting Spreadsheet;
  - A Utilities Assessment;
  - A 'Be Seen' planning stage submission;
  - Carbon Offset Fund contributions; and
  - Integration of the energy approach with design, air quality and transport;

- An **Energy Statement** at pre-occupation stage to include:
  - A re-evaluation of performance;
  - A heat scan of thermal bridges;
  - A BREAAM Post construction Assessment;
  - A BREEAM certification;
  - A HQM and or Passivhaus certification;

- A **Ventilation Strategy** and an **Extraction Statement**;

- Overheating Risk:
  - Overheating Risk Analysis;
  - Overheating Mitigation Strategy;
  - DTM (if relevant);
  - Home User Guide[27] (for occupiers); and
  - Alternative assessments (Passivhaus and/or HQM)

- A **Decarbonisation Plan** (if connecting to existing heat network);

- A **WLC Assessment** (if relevant) to include:
  - WLC Assessment template at each planning stage; and
  - Post-construction performance.

5.8.5 Proposals for minor development must provide a Design & Access Statement where sustainability information is proportionate to the size of the development. This will include adequate information to show how the energy and carbon requirements have been met.

5.9 Development Management

5.9.1 For major developments, requirement at each planning stage is listed below:

- **Pre-applications:** Preliminary Sustainability Statement, Preliminary Energy Strategy, BREEAM Preliminary Assessment, Whole Life-Cycle Carbon Assessment, template (pre-app stage), Carbon Emissions Reporting Spreadsheet (pre-app stage), Preliminary Utilities Assessment, Overheating Risk Analysis, Preliminary Ventilation strategy, Preliminary Decarbonisation Plan.

- **Outline applications:** All assessments, including an Implementation Plan explaining how the key policy considerations will be secured at the detailed design and application stage, energy masterplan for the area, assess the potential environmental effects. Planning conditions securing revision assessments as part of a Reserved Matters application in regards to a change in layout, use class, AQA, Transport Strategy or Energy Strategy.

- **Full applications:** Sustainability Statement, Energy Strategy, BREEAM Overheating, Be Seen planning stage submission, Whole Life-Cycle Carbon Assessment template (detailed planning stage), Carbon Emissions Reporting Spreadsheet, Utilities Assessment, Overheating Mitigation Strategy, Ventilation strategy and Decarbonisation Plan.

- **Phased development:** Each phase should demonstrate compliance with the key policy considerations through relevant assessments. All assessments to include calculations for the development as a whole and additional table showing calculations for all phases.

- **Post-construction:** Energy Assessment, BREEAM Post Construction Assessment and certification, WLC Post construction performance and BREL Report.

- **Post occupation:** Energy Statement, Be Seen reporting and evidence of Overheating Home User Guide.

5.9.2 The planning requirements for each type of proposed development are listed in tables below. These set out measures for:

Major Development | **Minor Development**

Change of Use | **Permitted Development**

Major Development

A Should be net zero carbon;

B Follow the energy hierarchy;

C Follow the heating hierarchy;

D Follow the cooling hierarchy;

E Consider overheating and ventilation;

F Calculate regulated and unregulated emissions;

G Incorporate passive principles and fabric first approach;

H Off-set any residual carbon emissions through financial contribution towards the Carbon Offset Fund;

I Applications with refurbishment should aim to meet London Plan Policy SI 2;

J Applications referable to the Mayor must undertake a WLC Assessment. Major applications are encouraged to undertake WLC Assessment.

Minor Development

K Maximise the opportunity to meet net zero carbon target;

L Consider energy hierarchy, heating hierarchy, cooling hierarchy, compliance with Passive principles and BREEAM.

Change of Use

M Where change of use affects the envelope of a building or its building services (e.g. heating, ventilation, air conditioning) it will need to meet minimum energy efficiency requirements under Building Regulations Part L;

N Encourage BREEAM Domestic Refurbishment ‘Excellent’ (where feasible).

Permitted Development

O Where permitted development affects the envelope of a building or its building services (e.g. heating, ventilation, air conditioning) they are encouraged to meet energy efficiency requirements.

5.10 Planning Conditions and Obligations and Monitoring Requirements

Planning Obligations

P The council will require work to be carried out in accordance with the proposals and measures set out in the submitted Energy Strategy and Sustainability Statement;

Q BREEAM Post-Construction Assessment and BREEAM Certification will be required to submitted post construction;

R WLC post-construction performance secured using GLA draft wording;

S Where connection to an existing or future heating network is deemed feasible, a commitment to connection may be secured;

T Any shortfall in meeting the energy hierarchy to offset any residual carbon emissions through financial contribution towards the council's Carbon Offset Fund;

U Post-occupation Energy Statement;

V 'Be Seen' reporting: as-built and in-use stage data secured using GLA draft wording;

W Evidence of Overheating Home User Guide.

Monitoring

X Monitor and reporting to the 'Be Seen' requirement at least five years via the GLA online portal;

Y Building Regulations Part L: an on-site audit will be required to confirm that the designed details have been constructed, and photographs must be taken as evidence to form the BREL report;

Z Post-construction Dynamic Thermal Modelling (DTM) to identify gaps in insulation/heat escape/thermal bridging.

6. Sustainable Movement

6.1 Sustainable Movement in Brent

Motor vehicles are responsible for 48% of NOx emissions, 30% of PM2.5 emissions and 25% of PM10 emissions in Brent. Transport emissions have not changed significantly over time, with a decrease of only around 7,000 tonnes of CO2 achieved since 2013. The council has commissioned a route map to get to net zero carbon emissions from road transport by 2030. This will require enormous changes in the way that people travel in Brent, in vehicle technology, in transport fuel sources and uptake in the technology that will make travel more efficient or not needed at all.

Positive steps are being made in changing travel behaviour. The overall mode share for walking, cycling and public transport in Brent increased to 69% in 2020 - one of the highest figures for an outer London borough. Car ownership is reducing, with the number of registered vehicles in the borough down from over 101,000 in 2016 to 96,000 in 2020.

There are future opportunities. Expansion of the London Ultra Low Emission Zone (ULEZ) and upgrading of the TfL bus fleet will help significantly improve air quality in parts of the borough. Council initiatives include further expansion of the network of 450 electric vehicle charging points; a 'Healthy Routes' programme delivering safe, continuous cycling routes (and supporting infrastructure), and attractive, safe and accessible walking routes to key destinations in the borough; and active travel initiatives, including the implementation of School Streets and Healthy Neighbourhoods.

The council is working jointly with TfL and the West London Alliance to take forward the West London Orbital rail link. The link would use the existing Dudding Hill freight line to create a London Overground passenger line connecting Hounslow in the west to Hendon and West Hampstead in the east. This will significantly improve orbital public transport links in the borough. It is also working with Barnet Council to create a high quality pedestrian connection from Brent Cross West Thameslink station to Staples Corner.

6.2 Policy Overview

National Policy & Guidance
National Planning Policy Framework, Para 104 -113
Planning Practice Guidance Travel Plans, Transport Assessments and Statements
National Design Guide, MHCLG 2021
National Model Design Code, MHCLG 2021
Gear Change: A bold vision for cycling and walking, DfT 2020
Future of Mobility: Urban Strategy, DfT 2019
The Inclusive Transport Strategy, DfT 2018
The Road to Zero, DfT 2018

London Plan Policy & Guidance
London Plan Policy T1 Strategic Approach to Transport
London Plan Policy T2 Healthy Streets
London Plan Policy T4 Assessing and mitigating transport impacts
London Plan Policy T5 Cycling
London Plan Policy T6 Car parking
London Plan Policy T6.1 Residential parking
London Plan Policy T6.2 Office parking
London Plan Policy T6.3 Retail parking
London Plan Policy T6.4 Hotel and leisure use parking
London Plan Policy T6.5 Non-residential disabled persons parking
Sustainable Transport, Walking and Cycling LPG (2022), TfL
Pedestrian Comfort Guidance for London (2019), TfL
Mayor's Transport Strategy (2018), TfL
Cycling Action Plan (2018), TfL
West London Cycle Parking Design Guide (2017), WestTrans
London Cycle Design Standards (2014), TfL

Local Plan Policy & Guidance
Brent Local Plan Policy BT1 Sustainable Travel Choice
Brent Local Plan Policy BT2 Parking and Car Free Development
Brent Local Plan Policy BT3 Freight and Servicing
Brent Long Term Transport Strategy (2022)
Brent Climate Change and Transport Study: Route map to net zero carbon by 2030 (2020)
Brent COVID-19 Transport Recovery Plan (draft)

6.2.1 The government has a target for all new cars and vans to be effectively zero emission by 2040. If this is achieved, the forecast reduction in CO2 emissions is 80% by 2050, even against a backdrop of traffic growth. To achieve this target the government's Road to Zero (2018) and Future of Mobility: Urban Strategy (2019) promotes innovation in the development of transport and infrastructure to support electric vehicles.

6.2.2 Alongside technical innovation, it is recognised there is a need to promote a change in behaviour. Gear Change: A bold vision for cycling and walking for England (2020) sets the ambition that cycling and walking will be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030. All new developments are to be designed to make sustainable travel, including cycling and walking, the first choice for journeys, and unnecessary motorised freight and servicing traffic reduced. The government has established a new executive agency Active Travel England to deliver on its ambitions.

6.2.3 The GLA and TfL set out approaches to reaching a net zero carbon transport system in London by 2050 in the Mayor's Transport Strategy (2018) and London Plan (2021). These documents align with national goals, while setting out specific policies and strategies for London. The Mayor's primary objectives include:

a) A target of 80% of all personal trips to be made on foot, cycle or public transport by 2041;
b) 70% of Londoners to be within 400 metres of a London-wide network of high-quality cycle routes by 2041;
c) A zero-emission zone in central London by 2025, inner London by 2040 and outer London by 2050;
d) Zero emission buses, taxis and private hire vehicles;
e) Reduction of total London traffic by 10-15%; and
f) Investment in electric vehicle charging points.

6.2.4 The Brent Long Term Transport Strategy (2022) sets out proposals for improving the transport system in Brent over the next 20 years, which aligns with Government and Mayoral objectives. It takes forward recommendations to achieve net zero carbon emissions from transport by 2030, ahead of the Mayor's target. Other key targets include increasing walking, cycling and public transport mode share to 80% and achieving a 25% reduction in car ownership and the volume of traffic on our roads by 2041.

6.3 Key Policy Consideration: Increase Active Travel and Public Transport

6.3.1 London Plan Policy T1 requires all development proposals to facilitate the delivery of the strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041. In line with Local Plan Policy BT1 active (walking and cycling) and sustainable (public transport) travel should be prioritised over private vehicle use.

6.3.2 To achieve this, proposals need to demonstrate that a 'Healthy Streets Approach' has been taken to deliver positive changes to the character and use of streets. This should be in accordance with the 10 indicators shown in **Figure 1**.

6.3.3 Proposals should also contribute to 'Vision Zero' by designing streets in a way which reduces dominance of motor vehicles and ensure slower vehicle speeds and safer driver behaviour. For example, through traffic calming.

6.3.4 Development should be permeable to pedestrians and cyclists, well-connected to the immediate surrounding area and also key destinations including town centres, schools, parks and transport hubs. A 20-minute neighbourhood approach should be taken whereby people have the ability to meet most of their daily needs in a 20-minute walk. Consistent with this approach, Local Plan Policy BH4 supports residential intensification in town centres, intensification corridors and areas with PTAL 3-6.

Figure 1: Healthy Streets indicators

6.3.5 Developments should also be well-connected to the cycle network. A map of the current cycle network and planned future links is periodically updated reflecting the most up to date Brent Cycling Strategy. Cycle parking should be provided, as a minimum, in accordance with standards in London Plan Policy T5. It should be secure, sheltered, well-located and fully accessible for parking for all cycle types. Detailed guidance is contained within the TfL London Cycling Design Standards and WestTrans West London Cycle Parking Design Guide.

6.3.6 Under London Plan Policy T4, development proposals should be well connected to public transport. Where relevant, developments may be required to contribute to improvements to public transport services and infrastructure. This can include enhancements to the frequency and reliability of bus and rail services and capacity/access improvements to stations and key interchange facilities.

6.3.7 Strategic developments are encouraged to include Mobility Hubs. This will bring together public transport with shared mobility options (such as bikes, e-scooters, e-cargo bikes and car clubs) in spaces designed preferentially for this purpose rather than the private car.

6.3.8 Under London Plan Policy T3 development should safeguard existing land, such as the Capital Ring walking route, and buildings used for public transport, active travel or related functions. It should also safeguard new sites/spaces and route alignments to provide future capacity, the West London Orbital for example.

6.4 Key Policy Considerations: Reduce Journeys by Private Vehicle

6.4.1 London Plan Policies T1-T6 and Local Plan Policy BT1 require, in the first instance, that development should reduce the need to travel overall. Amongst many others, one way to support this, is for developers to engage with digital network operators early to ensure sufficient ducting space for full fibre connectivity in new development and other measures to also support the move to 5G and enable home working (see London Plan Policy SI 6 and Local Plan Policy BE1).

6.4.2 As set out in Local Plan Policy BT1, car parking standards in the London Plan are maximums and car free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport. This is defined as those with PTAL 5-6. In Brent however, the council will also seek car-free development in PTAL 4 and possibly other locations where appropriate mitigations can be made. Developments elsewhere are to be designed to provide the minimum necessary parking.

6.4.3 Where parking is required, car clubs and car pools are strongly encouraged. For example, on large residential schemes free membership of a local car club could be provided.

6.4.4 In car free developments, access to on-street parking permits for future development occupiers other than for disabled blue badge holders will be limited. This will be alongside where there is a present Controlled Parking Zone (CPZ). Where a CPZ is not planned or in place, a financial contribution is likely to be sought to implement one through consultation.

6.4.5 Even in car free developments a level of disabled parking will be required. London Plan Policy T6.1 states that proposals delivering 10 or more residential units must provide at least one designated disabled persons parking bay per dwelling for 3% of dwellings. It must also be demonstrated in the Parking Design and Management Plan that if this provision proves insufficient in the future, an additional 7% of dwellings could be provided with one designated disabled person's parking space per dwelling. This may be on street in a CPZ as disabled blue badge holders are exempt from car free agreements.

6.4.6 Local Plan Policy BT3 requires the movement of goods and materials by road to be minimised. Freight or micro-consolidation should be used to reduce trips and sustainable alternatives, such as rail, canal or last mile delivery cargo bikes should be used where possible. Deliveries should be timed outside of peak hours to help reduce congestion.

6.5 Key Policy Considerations: Increase Take Up of Zero Emission Vehicles

6.5.1 Where car parking is provided in new developments, provision should be made for infrastructure for electric or other ULEVs in line with London Plan Policy T6.1 Residential parking, Policy T6.2 Office parking, Policy T6.3 Retail parking, and Policy T6.4 Hotel and leisure uses parking.

6.5.2 All operational parking should make this provision, including offering rapid charging. In residential developments, at least 20% of spaces should have active charging facilities, with passive[31] provision for all remaining spaces.

6.5.3 Provision of large cycle parking spaces are encouraged to provide charging facilities for e-bikes. Charge points at public buildings, stations, in town centres, at libraries could also support e-cargo bike deliveries or e-bike use.

6.6 Planning to Mitigate Transport Impacts

6.6.1 Development proposals will have regard to policies in the NPPF, London Plan, Local Plan and the Sustainable Transport, and Walking and Cycling London Plan Guidance. The council's Long Term Transport Strategy, Borough Plan and other local strategies will be material considerations.

6.6.2 **Table 21** below summarises the key policy considerations to achieve sustainable movement:

Step 1: Reduce the need to travel by car:

- Locate development in areas well connected to key destinations, where occupiers can meet most of their daily needs in a 20-minute walk
- Locate development on sites, which are or planned to be well connected by public transport and the cycle network. Where relevant contribute to improvements to public transport and the cycle network
- Enable home working by including ducting space to enable full fibre connectivity in new development and other infrastructure to support the move to 5G

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Step 2: Prioritise walking and cycling:

- Design developments to be permeable to pedestrians and cyclists and well connected to existing and planned routes
- Design streets in line with the Healthy Streets indicators
- Provide cycle parking in line with or exceeding London Plan standards and meeting TfL and WestTrans design standards

↓

Step 3: Reduce car use:

- Development to be car free in PTAL 4-6 areas, and include minimum car parking elsewhere
- All developments delivering 10 or more residential units must provide at least one designated disabled persons parking bay per dwelling for 3% of dwellings

↓

Step 4: Provision for Electric and Ultra-low emission vehicles:

- Where car parking is provided, make provision for electric or other ULEVs in line with or exceeding London Plan standards
- Where car parking is provided, make provision for car clubs and pool cars with active charging facilities and other shared mobility options, in lieu of private parking

↓

Step 5: Minimise movement of goods and materials by road:

- Consolidate deliveries and their time outside of peak hours
- Support and charging facilities for the use of cargo bikes or electric mobility options for 'last mile' delivery
- Where feasible move freight by water or rail

Table 21: Sustainable movement methodology

6.6.3 Depending on the scale and nature of the scheme, the following supporting studies may be required:

- Transport Assessment (TA) and Travel Plan or Transport Statement (TS) (see **Table 22**)
- Construction and Logistics Plan (CLP) (see **Table 23**)
- Delivery and Servicing Plan (DSP) (see **Table 24**)
- Parking Design and Management Plan (PDMP) (see **Table 25**)
- Heathy Streets Assessment (HSA) (see **Table 26**)

Transport Assessment and Travel Plan or Transport Statement

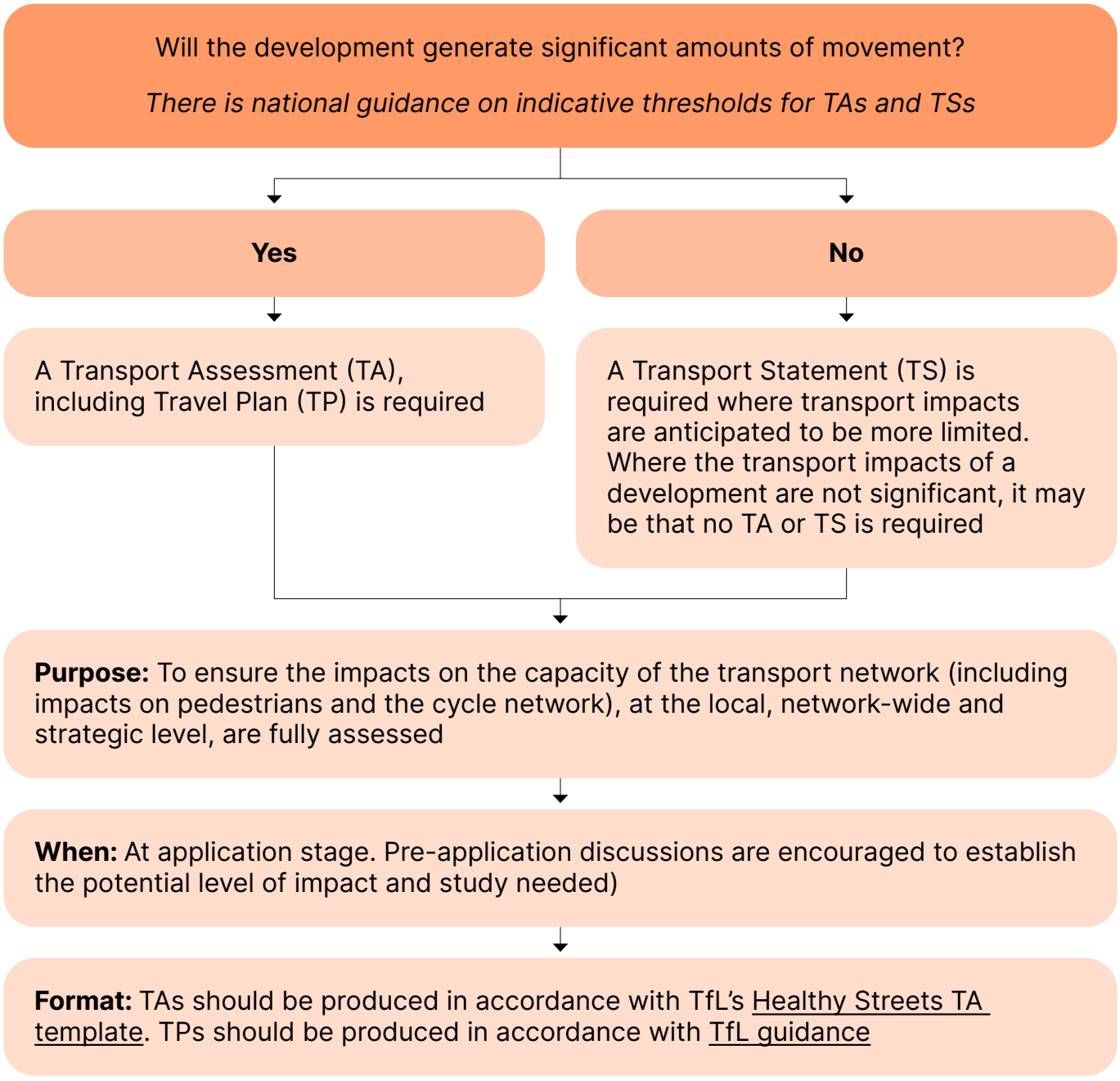

Table 22: Requirements for a Transport Assessment (TA) and Travel Plan or Transport Statement (TS)

Construction and Logistics Plan

Is this a major development and/or will construction impacts need to be mitigated?

(E.g. there is a busy pedestrian environment, the site is next to a major junction or where there is excavation for basements)

Yes	No
A Construction and Logistic Plan (CLP) is required	Consider impacts in TA or TS

Purpose: To set out the framework for understanding and managing construction vehicle activity into and out of a proposed development, encouraging modal shift and reducing overall vehicle numbers

When: An outline CLP accompanies the planning application and detailed CLP is conditioned for submission prior to construction

Format: CLPs should be produced in accordance with TfL's Construction Logistic Planning Guidance and associated template

Table 23: Requirements for a Construction and Logistics Plan (CLP)

Delivery and Servicing Plan

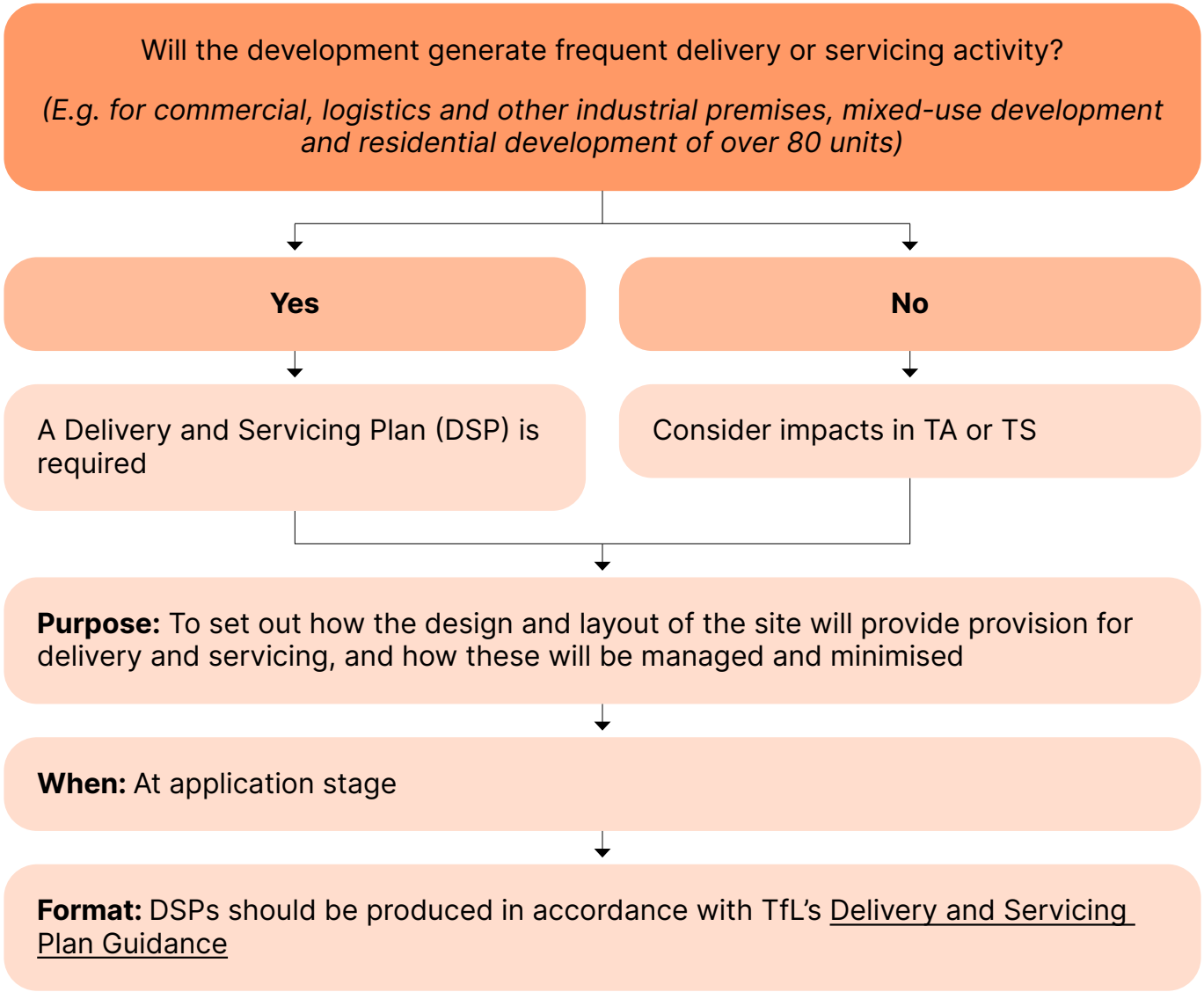

Table 24: Requirements for a Delivery and Servicing Plan (DSP)

Parking Design and Management Plan

Is this a major development with over 12 car parking spaces?

Yes	No
A Parking Design and Management Plan (PDMP) is required	Include details of car parking in Design and Access Statement

Purpose: To set how the car parking will be designed and managed, including for disabled parking

When: An outline PDMP accompanies the planning application and detailed PDMP is conditioned for submission prior to occupation

Format: With reference to TfL's guidance on parking management and parking design

Table 25: Requirements for a Parking Design and Management Plan (PDMP)

Healthy Streets Assessment

Does the development involve significant physical alterations to strategic or local highway?

(E.g. a S278 agreement is required, highway works exceed £200k)

Yes	No
A Healthy Streets Assessment (HSA) is required	A Stage 1 Road Safety Audit is still required where any highways works are proposed

Purpose: To assess the layout of highway against the Healthy Street Indicators. The objective is to get a score as high as possible, and for this to be evenly distributed across the 10 indicators as possible. A scheme should aim to increase every indicator's score and eliminate any scores of zero. The scoring will help inform discussions and identify how a scheme could be further improved

When: This will be most beneficial early in the design process, with a draft assessment at pre-app stage

Format: This should use the TfL Healthy Streets Check for Designers desktop tool

Table 26: Requirements for a Healthy Streets Assessment

6.7 Development Management

6.7.1 At each planning application stage, the following will be required, depending on the scale of the development:

- **Pre-applications:** A Transport Scoping Note should be submitted to help officers identify the level of assessment needed, and where relevant agree parameters for the Transport Assessment. Where the proposal involves works to the highway (excluding a drop kerb) a Healthy Streets Assessment should be undertaken early in the design process, and help inform pre-application discussions.

- **Outline applications:** All assessments to include a TA or TS. Planning conditions may secure revision to assessments as part of a Reserved Matters application in regards to a change in layout or transport strategy.

- **Full applications:** As set out above, in some circumstances the following will be required: Transport Assessment and Travel Plan or Transport Statement, Construction and Logistics Plan, Delivery and Servicing Plan, Parking Design and Management Plan, Heathy Streets Assessment.

- **Phased development:** Each phase should demonstrate through relevant assessments compliance with the key policy considerations. All assessments to include calculations for the development as a whole and additional table showing calculations for all phases.

6.7.2 The planning requirements for each type of proposed development are listed in tables below.

Major Development | **Minor Development**

Change of Use | **Permitted Development**

Major Development

A Prioritise active and sustainable travel over private motor vehicles;

B Increase permeability and connectivity by walking and cycling to key destinations;

C Remove drop kerbs where no longer required;

D Create safe, inclusive, legible and attractive environments for walking and cycling, reflecting a healthy streets and vision zero approach;

E Provide cycle parking and charging facilities in line with or exceeding London Plan standards and meeting TfL and WestTrans design standards;

F Support capacity, connectivity and other improvements to public transport and ensure the bus network can operate efficiently to, from and within developments;

G Ensure sufficient ducting space for full fibre connectivity infrastructure and other infrastructure to support the move to 5G;

H Be car-free in places that are (or are planned to be) well-connected by public transport (PTAL 4-6), with developments elsewhere designed to provide the minimum necessary parking in line with London Plan and Local Plan standards;

I Where car parking is provided, make provision for electric or other ultra-low emission vehicles in line with or exceeding London Plan standards;

J Where car parking is provided, make provision for car clubs and pool cars with active charging facilities and other shared mobility options, in lieu of private parking;

K Minimise movement of goods and material through freight and micro-consolidation.

Major Development (continued)

L Facilitate sustainable movement by rail, waterways and for last mile delivery cargo bikes or electric mobility options;

M Reduce pressure on road network by seeking to time deliveries outside of peak hours;

N Safeguard land and buildings where they are required to provide necessary connectivity and capacity by public transport, walking and cycling;

O Safeguard existing sidings and sites adjacent them or the canal with potential for freight use.

Minor Development

P As above where relevant and proportionate to the scale of development;

Q Where off-street parking is provided, preserve trees and provide adequate soft landscaping (in the case of front gardens 50% coverage), permeable surfaces, boundary treatment and other treatments to offset adverse visual impacts and increases in surface water run-off.

Change of Use

R As above where relevant and proportionate to the scale of development.

Permitted Development

S Demonstrate the proposal will not result in unacceptable transport and highways impacts;

T Provide safe and attractive routes into and within the development for walking and cycling;

U Be car-free in places that are (or are planned to be) well-connected by public transport (PTAL 4-6), with developments elsewhere designed to provide the minimum necessary parking in line with London Plan and Local Plan standards;

V Provide cycle parking, in line with or exceeding London Plan standards and meeting TfL and WestTrans design standard;

W Provide adequate space for servicing, storage and deliveries.

6.8 Planning Conditions and Obligations

6.8.1 Conditions will be informed by the measures outlined in the TA/TS, TP and DSP and HSA. In addition, a detailed CLP will be secured by condition. The Brent Planning Obligations SPD provides further information on our approach to obligations.

Planning Obligations

X Design phase:

- On-site measures outlined in the TA/TS, TP, DSP and HSA;
- Off-site implementation of measures will be secured where necessary to make development acceptable in transport and Healthy Streets terms.

Y Construction phase:

- Detailed CLP prior to commencement;
- S278 agreements where developer-funded highway works required;
- Transport management measures around the construction site should ensure continued permeability for wheelchair access, pedestrians, cyclists, bus services, accessibility of bus stops;

Z Operational phase:

- Implementation of TP;
- Implementation of DSP;
- Mitigation measures outlined in the TA/TS, TP and HSA.

6.9 Monitoring Requirements

6.9.1 On major developments post-completion, the developer will appoint a Travel Plan Co-ordinator with responsibility for monitoring performance against the TP targets and objectives. Where relevant, incorporating DSP targets.

6.9.2 Monitoring will be for a five year period. A survey should be undertaken at years 1, 3 and 5 and a Monitoring Report submitted to the council for approval. This will demonstrate how the TP has been implemented including:

a) Measures introduced and actions taken to promote the TP;
b) A statistical summary of the modal split of employees/residents/users disclosed by the monitoring surveys;
c) The progress of the TP in achieving targets and identifying any amendments to be agreed in writing by the council;
d) A plan for future actions to be implemented.

Monitoring

AA Performance against the Travel Plan will be monitored, where relevant;

AB Performance against the Delivery and Servicing Plan will be monitored, where relevant.

7. Waste & Circular Economy

7.1 Policy Overview

National Policy & Guidance
The Environmental Protection (Duty of Care) Regulations 1991
25 Year Environment Plan
Waste (England and Wales) Regulations 2011
Environment Act 2021
National Planning Policy Guidance - Waste (2015)
Defra Waste Management Plan for England 2021
HM Government Resources and waste strategy for England
Clean Neighbourhoods and Environment Act 2005
UKGBC The New Homes Policy Playbook 2021
UKGBC 'Circular economy guidance for construction clients: how to practically apply circular economy principles at the project brief stage'.
Defra Guidance on applying waste hierarchy
BRE's Homes Quality Mark and SMART 'Waste'

London Plan Policy & Guidance
London Plan Policy D3 Optimising site capacity through the design-led approach
London Plan Policy D13 Agent of Change
London Plan Policy SI 2 Minimising greenhouse gas emissions
London Plan Policy SI 7 Reducing waste and supporting the circular economy
London Plan Policy SI 8 Waste capacity and net waste self-sufficiency
London Plan Policy SI 9 Safeguard waste sites
Mayor of London LPG Circular Economy Statements
Mayor of London LPG Circular Economy Statements Template spreadsheet
Mayor of London LPG Whole Life Cycle Carbon Assessments

Local Plan Policy & Guidance
Brent Local Plan Policy BSUI1 Creating a resilient and efficient Brent
Brent Climate and Ecological Emergency Strategy 2021
West London Waste Plan
Waste and recycling storage and collection guidance for residential properties
Brent Design Guide SPD1

7.1.1 Waste management is reducing, re-using and recycling waste, and working towards designing out waste. The objective is effective waste management to reduce carbon emissions from the waste sector and contribute to the government's net zero target, and a green post-pandemic recovery.

7.1.2 The Environmental Protection Regulations 1991 (as amended), Waste (England and Wales) Regulations 2011 and the 25 Year Environment Plan set out the duty of care legislation for the safe management of waste on waste holders.

7.1.3 The Resources and Waste Strategy for England builds on the commitment for materials resources preservation by 2050 in line with the 25 Year Environment Plan. This is through minimising waste, promoting resource efficiency and moving towards a circular economy in England.

7.1.4 Defra's Waste Management Plan for England 2021 fulfils the requirement of the 2011 Regulations. It provides an overview of waste management to set the course for the commitment to double resource productivity by 2050. In response to this, the Environment Act aims to reform the UK's responsibility system in relation to resource and waste management to strengthen policies at every stage of the product lifecycle.

7.1.5 The Resources and Waste Strategy for England contains a framework of five strategic ambitions to reduce the impact of consumption and the resulting waste on the environment to:

1) Work towards eliminating food waste to landfill;
2) Double resource productivity;
3) Work towards ensuring all plastic packaging placed on the market is recyclable, reusable or compostable;
4) Eliminate avoidable waste of all kinds; and
5) Eliminate avoidable plastic waste.

7.1.6 The London Environment Strategy sets out the Mayor's approach for waste management.[32] London Plan Policies SI 7 Reducing waste and supporting the circular economy, SI 8 Waste capacity and net waste self-sufficiency and SI 9 Safeguarded waste sites set the strategic policy for waste. Other policies that tie in with waste management include London Plan Policy SI 2.

7.1.7 Households, businesses, civic amenity sites and construction demolition and excavation generate waste in Brent. The council has three roles, one as a waste planning authority, one as a disposal authority and also as a waste collection authority. Waste planning authorities are responsible for waste development plans. Brent is part of the West London Waste Authority (WLWA).[33] The WLWA is a statutory waste disposal authority and is responsible for disposing of waste collected.

7.1.8 The council is responsible for the collection of non-recyclable and recyclable waste from all domestic properties within its boundary. In line with the London Environment Strategy, the council has set out its local reduction and recycling targets in Brent's Reduction and Recycling Plan. In addition, the Brent Climate and Ecological Emergency Strategy 2021 sets out the council's aim to reduce the borough's consumption emissions by two thirds by 2030. It focuses on community led behaviour change, supporting waste infrastructure and enhancing low carbon circular economy.

7.1.9 The council has also published the Waste and recycling storage and collection guidance for residential properties; the most up-to-date guidance will be available on the council's website.[34] Brent Design Guide SPD1 also sets out principles on bin storage for developments.

7.1.10 The council supports the BRE's Home Quality Mark that assigns assessment credits based on a site's waste reduction performance. It includes credit category on 'space' (consultation with waste collection authority, composting facilities and management and internal waste storage for recyclable waste). Another category is 'construction impacts' (site waste management from product procurement to landfill). The BRE also encourages the use of waste management reporting tool called SMART 'Waste'. The tool enables users to capture, monitor and target a project's on-site waste outputs, impacts and costs.

7.1.11 Waste minimisation can be effectively addressed in the design and layout of new development, particularly as the population of Brent continues to grow. Implementing the waste hierarchy and promoting circular economy hierarchy and principles are the key policy considerations to reducing the amount of waste produced and ensuring that more materials are reused, repaired and recycled.

7.2 Key Policy Consideration: Waste Hierarchy

7.2.1 The Waste (England and Wales) Regulations 2011 set out a five step waste hierarchy dealing with waste, ranked according to environmental impact (see **Table 27**). The waste hierarchy is a framework for securing a sustainable approach to waste management. London Plan Policies SI 7, SI 8 and SI 9 require development proposals to implement the waste hierarchy.

Stage 1: Prevention: Use less material in design and manufacture, keeping products for longer (re-use); Use less hazardous material

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Stage 2: Preparing for re-use: Checking, cleaning, repairing, refurbishing, whole items or spare parts

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Stage 3: Recycling: Turning waste into a new substance or product and include composting if it meets quality protocols

↓

Stage 4: Other recovery: Include anaerobic digestions, incineration with energy recovery, gasification and pyrolysis which produce energy (fuels, heat and power) and materials from waste; some backfilling operations

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Stage 5: Disposal: Landfill and incineration without energy recovery

Table 27: Waste hierarchy

7.3 Key Policy Consideration: Reducing and Managing Waste

7.3.1 London Plan Policy SI 7 encourages waste minimisation and waste prevention through re-use of materials and using fewer resources. It also requires developments to design adequate and easily accessible storage space and collection systems.

7.3.2 Developments, as a minimum, should separate the collection of dry recyclables and food. Provision needs to take account of storage needs identified for current residential collections and meeting the future higher recycling standards. Apart from squandering resources, waste transport, treatment and landfill disposal all contribute to harmful greenhouse gas emissions.

7.3.3 In addition to relevant legislation, the council's residential waste and recycling storage guidance provides clarity when planning and designing a new development, undertaking refurbishment, or modernising or changing the use of a building. Proposals for residential developments are encouraged to contact the council's Neighbourhood Management team in the first instance for information on local refuse collection contractors.

7.3.4 Major residential developments should address waste and recycling storage and collection in a Site Waste Management Plan (SWMP). It should demonstrate that minimum storage and collection requirements have been met. The applicant should engage with the council's Refuse team and Transport team at the early stages of design to overcome any challenges.

7.3.5 A Turning Assessment (using AutoTurn) may be required in cases where access roads present challenges of reversing. A vehicle dimensions chart is provided in Appendix 2. In cases where large collection vehicles are accessing and egressing a development, a Swept Path Analysis may be required.

7.3.6 Minor residential developments are encouraged to address waste management in a Design & Access Statement.

7.3.7 Commercial developments should address waste and recycling storage and collection in a Delivery and Servicing Plan. It should demonstrate waste management of the premises for relevant types of business waste.

7.3.8 Developers should have regard to the following requirements, in line with the council's guidance for residential properties and meet the Annex 1 capacity requirements (see **Table 28** and **Table 29**). The list is not exhaustive and other measures should take into consideration of best quality design and effective management.

Residential and Commercial Waste

a) Encourage reduction in the volume of refuse;
b) Provide adequate sorting and re-use facilities at source;
c) Provide adequate space to accommodate required number of bins and ample head height to allow for the lids to be lifted;
d) Incorporate innovative waste management systems such as piped underground refuse collection systems;
e) High quality waste facilities should be visually attractive, ventilated, well-lit, easy to clean flooring, should not detract from their immediate surroundings and be within the footprint of the building;
f) Waste storage should be sited on ground floor, with clear access (for all emergency services), and to cause minimum nuisance;
g) Provide individual or community composting facilities;

- For residential development with private gardens, provide an area, away from windows/doors or ventilation intakes for habitable areas, for the placement of home composting bins to compost food and garden waste;
- For residential development without private gardens, facilitate composting compliant with Animal by-product Regulations (2005), register compost scheme with the EA to acquire waste management licence or environmental permit or an exemption;

h) Provide internal and external storage[35] space facilities for the source separation and storage of different types of household waste including non-recyclable, recyclable and composting material;
i) Collection arrangements for non-recyclable and recyclable material should be easily accessible by collection vehicles and operatives;
j) A drop kerb near as possible to the collection point in accordance with Health and Safety at Work Regulations. An acceptable pull length distance for collection crews is 10m for 1,100L containers and 20m for 140 and 240L (two wheeled containers);
k) Access roads to accommodate collection vehicles, avoiding vehicles reversing, and to address traffic and public safety, as demonstrated in a Turning Assessment;
l) Access roads and pavements should be a reasonable gradient for ease access for collection vehicles. This applies to access routes inside the development as well;
m) Areas in front of refuse storage areas should be flat and level to facilitate movement of wheeled containers;
n) The proposed storage space, collection point, collection routes for vehicles, distance between collection point and storage area should be clearly marked and illustrated in any submission drawings;
o) Include information in a management plan of the responsible party for transporting waste and recycling to a collection point in cases of storage at basement level;
p) The calculations made to determine the overall storage allowance should also be submitted;

q) Refuse and recycling storage area requirements and the number of refuse and recycling containers should meet Brent's collection regime of one collection per week of each waste stream. This is for large developments comprising more than eight households. Inadequate refuse storage areas with insufficient room to hold the correct number of containers will result in additional collections that are chargeable;
r) Planning applications where commercial waste will also be generated will require separate storage and collection arrangements;
s) Planning applications where clinical waste is likely to be generated will require separate storage and collection arrangements;
t) Residential conversions and multi-occupancy households must meet the guidance requirements;
u) External storage areas should not interfere with pedestrian or vehicle access;
v) Avoid providing cycle storage in bin storage areas;
w) Adequate provision of access for disabled and elderly people allowing manoeuvre of a wheelchair;
x) Enable cleaning of bins with suitable water supply and drainage for where all run-off must flow towards a drainage point;
y) Support for bulky waste disposal through signposting relevant collection contact details;
z) Access agreements agreed with Recycling and Waste services before planning approval;
aa) Inform the council's Building Control team of completion of the new development; and
ab) Contact the council's Neighbourhood Management team to organise the delivery of the necessary containers.

7.3.9 All residential development should provide refuse storage and receptacle capacity requirements based on number of units. They should be fitted with separate bins in line with the below listed requirements:

Type of development	**Requirements** *(mm = millimetre, m = meter, L = litre)*
Residential development (over 8 households)	• External space: 60L per bedroom for residual waste and 60L for dry recycle and 23L container kerbside for organic food waste; • Internal space: 30L per household for residual waste and 30L for dry recycle and 5L kitchen caddy for organics; • Lift to accommodate minimum 1,100L capacity and porter space; • Collection operatives should not be required to move wheeled bins of up to 240L more than 20m or 1,100L bin more than 10m; • Provide reasonable space for collection vehicle: minimum clearance height of 2,920mm for, access path to be minimum 2m width, gradient not to exceed 1:14; • Access locks preferably to be keypad access for refuse storage areas;
Residential conversions and multi occupancy households (up to 8 households)	• Minimum room height 1,810mm for 240L bins; • Minimum room height 2,390mm for 1,100L bins; • External space: 120L per bedroom for residual waste and 120L for dry recycle, 23L container kerbside; • Internal space: 30L for residual waste and 30L for dry recycle and 5L kitchen caddy for organics;
Single household	• External space: 240L/bedroom for residual waste and 240L for dry recycle, 23L container kerbside; • Internal space: 30L for residual waste and 30L for dry recycle and 5L kitchen caddy for organics.

Table 28: Waste storage space requirements for different types of development

7.3.10 The council supplies waste containers at a cost in the capacity of the following:

Type of bin	Capacity (L) and size (mm) *(mm = millimetre, L = litre)*
Wheeled bins	• 140L (L550 x W480 x H1,070) • 240L (L730 x W585 x H1,100) • 1,100L (L1,370 x W1,025 x H1,460)
Kerbside container (food caddy)	• 23L (W320 x H405 x D400)
Home compost bins	• 220L (H900, Diameter 740) • 330L (H1,000, Diameter 800)

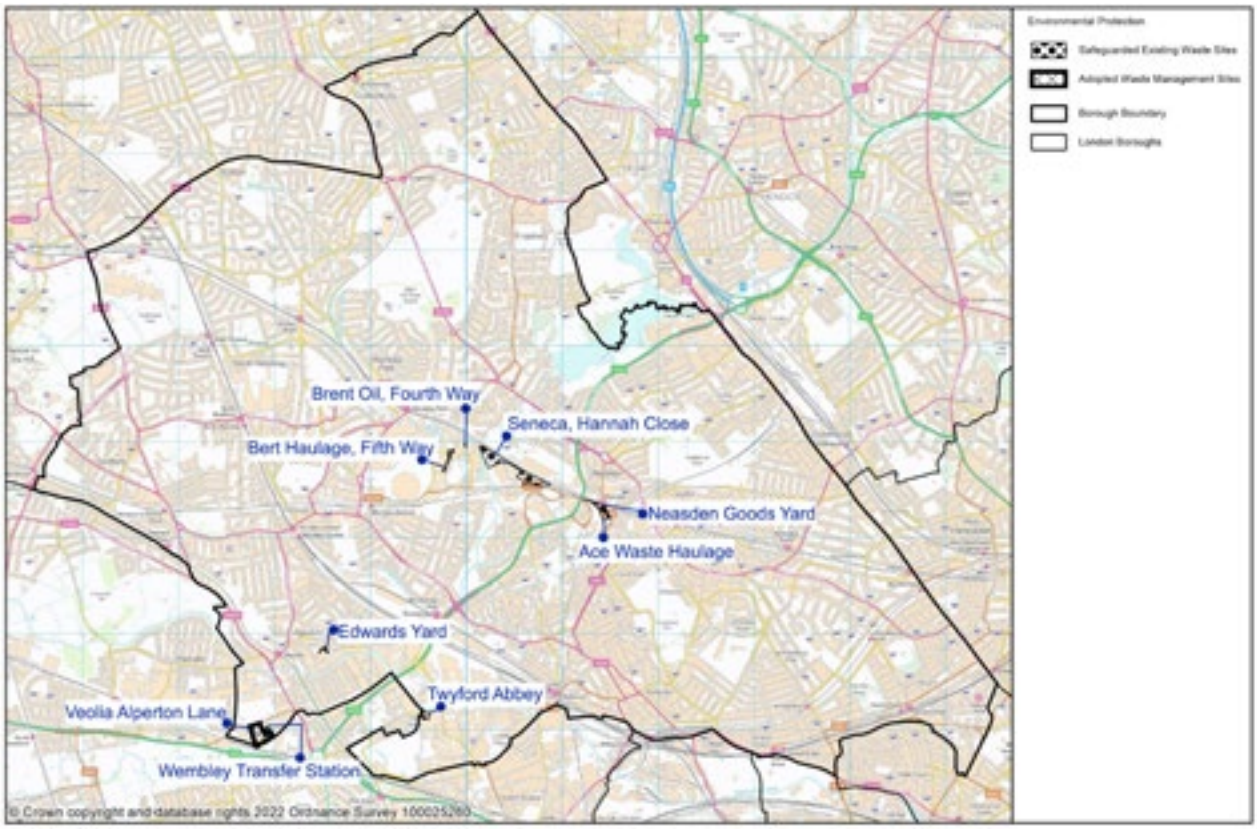
Table 29: Bin types, capacities and sizes

7.4 Key Policy Consideration: Safeguarded Waste Sites

7.4.1 National policy requires boroughs to have regard to the waste apportionment set out in the London Plan. This is the proportion of total household, commercial and industrial waste.

7.4.2 The Mayor is committed to sending zero biodegradable or recyclable waste to landfill by 2026. Key aspects of how this can be achieved are through addressing cross-boundary flow through joint working, a circular economy approach (see **Section 7.5**) and use for energy recovery through renewable energy generation from organic/biomass waste (see **Chapter 5**).

7.4.3 London Plan Policies SI 8 and SI 9 protect existing waste management sites and requires their capacity to be optimised. The London Waste Map and the WLWP shows the locations of permitted waste facilities and allocated sites (see **Map 5**). It requires local authorities to work together to allocate sufficient sites, reduce waste through circular economy, areas and facilities to manage the apportioned tonnage of waste allocated in Table 9.2 of the London Plan.



Map 5: Safeguarded existing waste sites and adopted waste management sites

7.4.4 Policy SI 8 supports development proposals for new waste sites or capacity increase through meeting the following criteria:

a) Assessing the existing nature of activity, scale and location;
b) Implementation of waste hierarchy and its contribution to circular economy;
c) Achieving a positive carbon outcome where re-use and recycling high carbon content material;
d) Minimising the impact on the surrounding area's amenity; and
e) Limiting transport and environmental impacts, including exploring use of rail and waterways.

7.4.5 The council's joint WLWP plans for all waste in the plan area up to 2031. The WLWP polices are a key consideration and form part of the council's planning policies. It sets out a list of existing sites, allocated sites and policies regarding:

- Provision of new waste management capacity (Policy WLWP 1);
- Safeguarding and protecting all existing and allocated waste sites within west London (Policy WLWP 2);
- Location of waste development (Policy WLWP 3);
- Ensures high quality development (Policy WLWP 4);
- Decentralised energy (Policy WLWP 5);
- Sustainable site waste management (Policy WLWP 6); and
- NPPF requirements (Policy WLWP 7).

7.4.6 London Plan Policy SI 9 and WLWP Policy 2 protects existing and allocated waste management sites for continued use for waste. Their redevelopment and proposals for new waste sites should adhere to the requirements listed in these polices. A Waste Management Facility Relocation Strategy should accompany the planning application.

7.4.7 In some cases, the EA's historic permit for permitted capacity on waste sites has not been updated. As such, the council, in line with London Plan Policy SI 9, require the compensatory capacity to be calculated as the maximum achievable throughput of the site proposed to be lost. This is calculated over the past five years.

7.4.8 In cases where this is not possible, the potential capacity of the site should be appropriately addressed. The applicant will be expected to undertake a desktop study analysing tonnage data, comparable practical capacity of waste facilities and/or comparable throughput of different waste facilities. Appropriate engagement with the EA will also be required.

7.4.9 For new waste facilities, Strategic Industrial Locations (SIL) will provide the main opportunities. Intensification of existing waste management sites also present an opportunity.

7.4.10 Waste processing facilities should be well designed, respect context, not be visually overbearing, should contribute to the local economy and follow the Agent of Change principles (London Plan Policy D13).

7.5 Key Policy Consideration: Circular Economy

7.5.1 London Plan Policies D3 and SI 7 promote a circular economy (CE) as a change in the way we produce, consume and dispose both goods and services. A circular process creates a continuous flow of materials where existing materials are retained leaving a minimum of residual waste. It results in extended life of the initial material production, minimises waste and takes the burden away on resources. There are also overall benefits to reducing carbon emissions and transportation demand.

7.5.2 Policy SI 7 requires a Circular Economy Statement (CE Statement) for referable planning applications. Smaller developments and businesses are also encouraged to adopt the principles of a CE. See **para 7.5.7** for the CE Statement requirements.

7.5.3 Policy SI 7 and the Circular Economy Statement LPG set out the overarching CE principles that support the implementation of multiple design approaches for existing and new developments (see **Table 30**). These are expected to be adopted for each project, development aspect, layers or uses. The broader CE principles include:

a) Build in layers[36] where parts of building can be replaced where necessary;
b) Design out waste;
c) Design for longevity to extend the useful life of each product;
d) Design for disassembly;
e) Design for adaptability or flexibility for current and future demands; and
f) Use innovative systems and elements for re-use.

7.5.4 The CE hierarchy sets out the building approaches that maximises the use of existing material. Making the best use of the land is an overall consideration that needs to inform the retention of existing buildings.

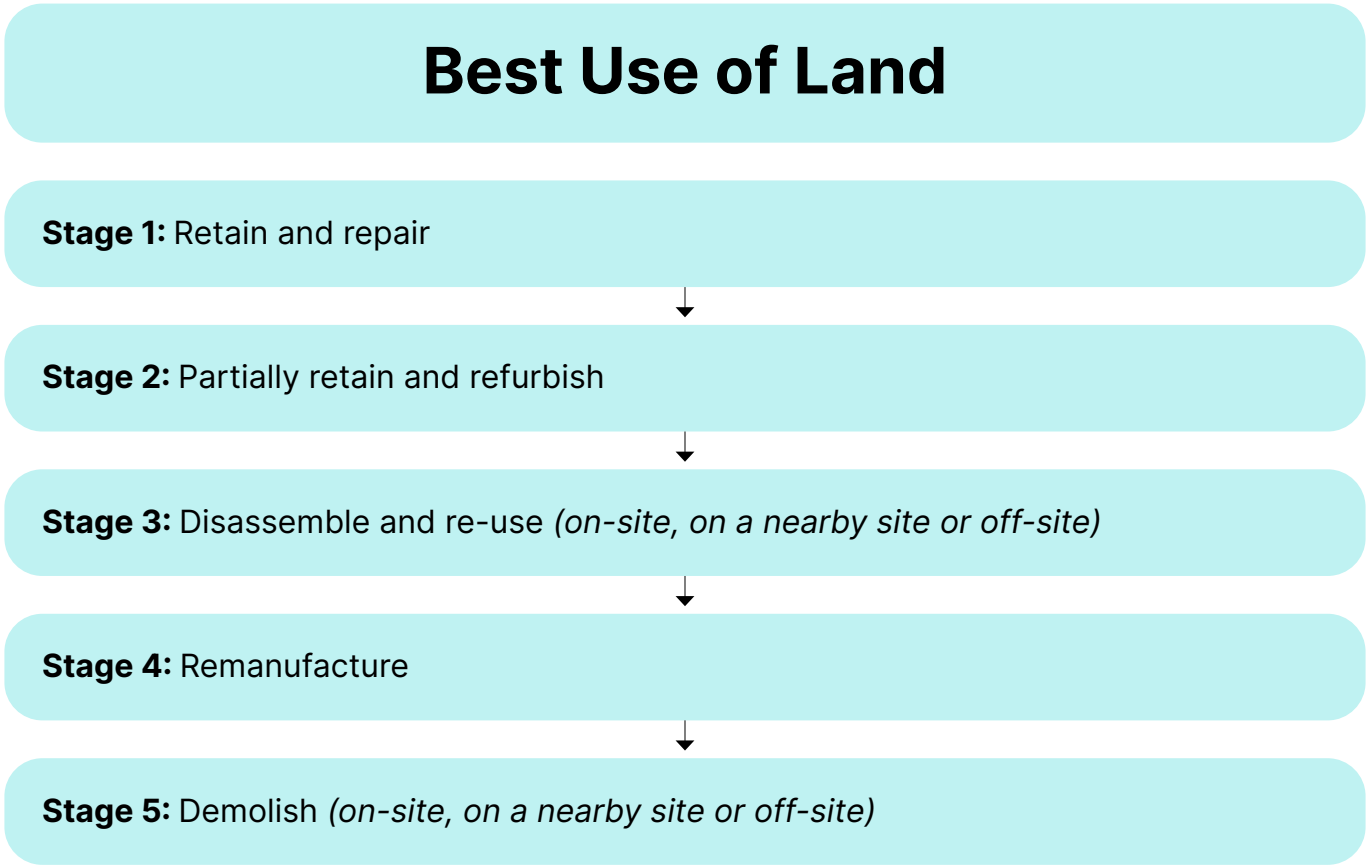


Table 30: Circular economy hierarchy for existing materials

Design approach	Multiple approaches and principles	Considerations
Existing built structures (lowest carbon option)	Retain and retrofit	Vast majority of the building's fabric retained, with refurbishment or retrofitting for the same or new uses through restoring, refinishing and future proofing
	Partially retain and refurbish	Significant quantities of carbon-heavy aspects of the building (floors and substructure) retained in place, with replacement of some elements (walls or roofing) and significant refurbishment adding floors or extensions
	Disassemble and re-use	Careful selective deconstruction of the building, material, and then re-using If re-use is not possible, materials separated for processing and recycling into new elements Re-use ideally on the site or, where this is not possible, off-site (with nearby sites preferred)
	Demolish and recycle	Demolition with elements and materials processed for use on the site or on another site

Table 31: Design approaches and principles for existing built structures

7.5.5 A decision tree is provided in the CE Statement LPG that should be used to determine the approaches. See Figure 4 for existing built structures and see Figure 5 for new developments.

7.5.6 The CE Statement should reflect these principles, the CE hierarchy and design approaches based on the type of proposal. The relevant evidence base and template is required at each of the various planning stages.

Design approach	Multiple approaches and principles	Considerations
New developments (adapted to extend their life)	Building relocation	Designing to allow the whole building to be used on a different site, either by moving as a whole or disassembling into large modules
	Component or material reuse	The reuse and preparation of a product in its original form with minimal reprocessing. Reused as a whole; redeployed as modules; or reused as a kit of parts on one or more different sites
	Adaptability	A building structure designed to be easily altered to prolong its life
	Flexibility	A building floorplates designed to allow easy rearrangement of its internal fit-out and arrangement to suit the changing needs of occupants
	Replace-ability	Designing for easy removal and upgrade, and ideally to be reused, remanufactured or recycled on a part-by-part basis
	Disassembly	Designed to allow the building and its components to be taken apart with minimal damage to facilitate reuse or recycling
	Longevity	Designing to avoid a premature end of life for all components through considering maintenance and durability

Table 32: Design approaches and principles for new developments

Circular Economy Statement Process

7.5.7 A CE Statement is required to be submitted at each stage to the GLA.[37] The CE Statement must include two parts:

1) **Written report:** A narrative and information on calculations, studies, supporting evidence, project details table[38] in case of multiple buildings, explain different approaches being adopted for different buildings with reference to site plan, evidence on engagement with stakeholders and highlight any shortcomings and/or other social benefits of the proposal;
2) **CE template spreadsheet:** Relevant tab(s) filled in at each stage. Each tab contains a number of tables where information should be recorded (see the CE template spreadsheet).

7.5.8 The supporting documents are submitted at various stages of development:

- Pre-demolition Audits;
- Pre-redevelopment waste audits;[39]
- Bill of Materials;
- End of Life Strategy;[40]
- Operations Waste Management Plan;
- Recycling and Waste Management Plan; and
- Recycling and Waste Reporting.

7.5.9 A CE Statement must be submitted at the following stages and should be submitted with an application undertaken by an accredited assessor:

Stage 1: Preparation: Submit a Draft Circular Economy Statement at pre-application stage

- Engage early with LPA on the retention, demolition and making the best use of land;
- Complete and submit the 'pre-application stage' tab in the CE template:
- Confirm details about the site, circular economy design approaches, principles, building layers and relevant supporting material;
- Ideally highlight CE targets and commitments, Pre-demolition Audit and Pre-redevelopment Audit; and
- Outline how the proposal will design out waste at each module stage

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Stage 2: Design: Submit a detailed Circular Economy Statement at full or outline application stage

- Complete and submit the 'outline or detailed' stage tab in the CE template;
- Confirm details in all tables including design approaches, building layers, Pre-demolition Audit and Pre-redevelopment Audit, estimated Bill of Materials, End of Life Strategy, Operational Waste Management Plan, estimated Recycling and Waste Reporting, CE targets and commitments;
- Other supporting information should include Site Waste Management Plan, building weight calculations, scenario modelling demonstrating adaptability and lean design options appraisal, re-used or recycled content calculations;
- Commitment to achieve the relevant targets (depending on the operational activity) set out in London Plan Policy SI 7 and London Environment Strategy;

- Demonstrate that measures such as consolidated, smart logistics and community-led waste minimisation schemes have been explored;
- Achieve 'pioneering' status;[41]
- Align outcomes with WLC Assessment;
- In case of outline application, there is no requirement to submit End of Life Strategy, Operations Waste Management Plan;
- The metrics to be used to quantify or monitor performance should be included; and
- Confirm who will be providing the information at post-construction stage.

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Stage 3: Post-construction: Submit Circular Economy Statement upon commencement of RIBA Stage 6

- Complete and submit the 'post-construction' stage tab in the CE template within three months of practical completion and prior to occupation;
- Update and confirm information provided at planning stage: CE targets performance reporting, actual Bill of Materials, actual recycling and waste reporting and lessons learnt and key achievements; and
- Any changes in design following the submission should be accounted for in the post-construction CE Statement.

Table 33: Circular economy methodology

7.5.10 The Circular Economy Statement LPG draws on a close relationship between circular economy and whole life cycle. As such, the same Bill of Material should be used for assessments of both. The circular economy outcomes should inform the end of life scenarios. This will also assist in reducing emissions in Whole Life Cycle Modules A-C and D (see **Section 5.7**).

7.6 Key Policy Consideration: BREEAM and Other Accreditations

7.6.1 Major planning applications will be assessed against frameworks to ensure that waste management needs are adequately addressed. Where deemed feasible, developments are actively encouraged to pursue accreditation with:

Accreditation

A BREEAM New construction for individual buildings

B BREEAM Refurbishment and Fit out for residential and non-residential existing buildings, including conversions

C BREEAM Net zero carbon

D BREEAM Construction waste management

E BREEAM Recycled aggregates

F BREEAM Speculative floor & ceiling finishes

G BREEAM Adaptation to climate change

H BREEAM Operational waste (residential)

I BREEAM Operational waste (non-residential)

J BREAAM Whole Life Performance

K Passivhaus (new built)

L Passivhaus EnerPhit (building retrofit)

M Home Quality Mark

7.7 Planning to Mitigate Waste

7.7.1 In assessing planning applications that generate waste, the council will have regard to the Environment Act 2021, NPPF, London Plan and Local Plan. Other guidance will include LPGs, local strategies, Brent Design Guide SPD1 and this SPD.

7.7.2 The following assessments will be required depending on the key policy considerations, application type and scale of development:

- Sustainability Statement;
- CE Statement;
- Site Waste Management Plan (SWMP);
- Delivery and Servicing Plan;
- Turning Assessment;
- Swept Path Analysis;
- Waste Management Facility Relocation Strategy; and
- Design & Access Statement.

7.7.3 In addressing the key policy considerations, all supporting evidence including calculations, surveys, mitigation hierarchy, justifications, maintenance, monitoring and reporting must be submitted to the council.

7.8 Development Management

7.8.1 At each planning application stage, the following will be required:

- **Pre-applications:** Preliminary Sustainability Statement, Draft CE Statement, Preliminary, Pre-demolition Audit, Preliminary SWMP, Preliminary Delivery and Servicing Plan, Preliminary Turning Assessment, Swept Path Analysis and Preliminary Waste Management Facility Relocation Strategy.

- **Outline applications:** All assessments including an Implementation Plan explaining how the key policy considerations will be secured at the detailed design and application stages and energy masterplan for the area to assess the potential environmental effects. Planning conditions securing revision assessments as part of a Reserved Matters application in regards to a change in layout, number of units, use class, Transport Strategy or Energy Strategy.

- **Full applications:** Sustainability Statement, Detailed CE Statement, Pre-demolition Audit, SWMP, Delivery and Servicing Plan, Turning Assessment, Swept Path Analysis, Waste Management Facility Relocation Strategy, Bill of Materials, End of Life Strategy, Operations Waste Management Plan, Recycling and Waste Management Plan and Recycling and Waste Reporting.

- **Phased development:** Each phase should demonstrate through relevant assessments compliance with the key policy considerations. All assessments to include calculations for the development as a whole and additional table showing calculations for all phases.

- **Post-construction:** Circular Economy Statement.

7.8.2 The planning requirements for each type of proposed development are listed in tables below. These set out measures for:

Referable Applications

Major Development | **Minor Development**

Change of Use | **Permitted Development**

Referable Applications

A Follow the waste hierarchy;

B Follow the CE hierarchy and principles;

C Submit CE Statement, Pre-demolition Audit, SWMP, Delivery and Servicing Plan, Turning Assessment, Swept Path Analysis and Waste Management Facility Relocation Strategy;

D Applications with refurbishment should aim to meet London Plan Policy SI 2.

Major Development

E Follow the waste hierarchy;

F Follow the CE hierarchy and principles;

G Submit CE Statement, Pre-demolition Audit, SWMP, Delivery and Servicing Plan, Turning Assessment, Swept Path Analysis and Waste Management Facility Relocation Strategy;

H Applications with refurbishment should aim to meet London Plan Policy SI 2.

Minor Development

I Follow the waste hierarchy;

J Maximise the opportunity to meet net zero carbon target by considering CE hierarchy and principles;

K Encourage BREEAM Domestic Refurbishment 'Excellent' (where feasible);

L Identify location of refuse storage and collection point.

Change of Use

M Where change of use affects the envelope of a building or its building services will be encouraged to follow the waste hierarchy and consider CE hierarchy and principles;

N Encourage BREEAM Domestic Refurbishment 'Excellent' (where feasible);

O Identify location of refuse storage and collection point.

Permitted Development

P Where permitted development affects the envelope of a building or its building services they are encouraged to follow the waste hierarchy and consider CE principles;

Q Identify location of refuse storage and collection point.

7.9 Planning Conditions and Obligations and Monitoring Requirements

Planning Obligations

R **Design phase:**

- On-site measures outlined in assessments in cases where the design of the scheme is evolving;
- Management and maintenance requirement;
- To ensure commitments in the approved assessments;
- Where indicative values are used at the application stage, final values will be required by condition;
- Approval of a referable outline planning permission, securing the submission of a CE Statement with each reserved matters application.

S **Construction phase:**

- Required to meet the mitigation measures identified in the approved assessments to manage and mitigate waste;
- Waste facilities to be provided before occupation.

T **Post-construction phase:**

- Submit CE Statement at post-completion stage.

U **Operational phase:**

- Management and maintenance.

Monitoring

V Submit a post-construction monitoring report prior to occupation to GLA with any supporting evidence.

8. Other Environmental Impacts

8.1 Policy Overview

National Policy & Guidance
Environmental Protection Act 1990
Control of Pollution Act (CoPA) 1974
Water Resources Act 1991
Pollution Prevention and Control Regulations 2000
Control of noise at work Regulations 2005
Clean Neighbourhoods and Environment Act 2005
Noise and Statutory Nuisance Act 1993
Noise Act 1996
The Environmental Permitting (England and Wales) Regulations 2016
Air Quality (England) Regulations 2002 (as amended)
Air Quality Standards Regulations 2010 (as amended)
Environmental Permitting (England and Wales) Regulations 2016 (as amended)
NPPF Para 183, 184 and 185
Defra Noise policy statement for England
EMAQ Control of Odour and Noise from Commercial Kitchen Exhaust Systems
IAQM Guidance on the assessment of odour for planning
Public Health England Strategy
ILP guidance notes for the Reduction of Obtrusive Light GN01-21

London Plan Policy & Guidance
London Plan Policy SD1 Opportunity Areas
London Plan Policy D6 Housing quality and standards (Table 3.2)
London Plan Policy D8 Public realm
London Plan Policy D10 Basement development
London Plan Policy D13 Agent of Change
London Plan Policy D14 Noise
London Plan Policy E7 Industrial intensification, co-location and substitution
London Plan Policy G8 Food growing
London Plan Policy HC6 Supporting the night-time economy
London Plan Policy SI 8 Waste capacity and net waste self-sufficiency
London Plan Policy T2 Healthy Streets
London Plan Policy T7 Deliveries, servicing and construction
Control of Dust and Emissions During Construction and Demolition SPG, 2014
IAQM Guidance on the assessment of dust from demolition and construction
The Code of Construction Practice

Local Plan Policy & Guidance
Brent Local Plan Policy DMP1 – Development Management General Policy
Brent Local Plan Policy BSUI2 – Air Quality

8.1.1 The Environmental Protection Act 1990 gives local authorities the responsibility to manage environmental health. In order to provide good health and high quality of life, effective management of adverse pollution impacts needs to be carefully considered. This can include factors likely to impact health such as noise, odour, dust, vibration, light pollution, contamination, waste and air pollution (for waste: see **Chapter 7**; for air quality: see **Chapter 2**).

8.1.2 The NPPF requires new developments ensure that they are appropriate for their location taking into account the likely effects of pollution on health, living conditions and the natural environment. These adverse impacts could arise from the new development or the existing environmental conditions of the location.

8.1.3 As part of pollution control, the EA controls some types of emissions and operations of regulated facilities[42] through environmental permits. The permit may set source limits on emissions to air, water or land. In the case of a risk, an Emissions Management Plan may be required when applying for a permit to demonstrate how risk will be controlled.

8.1.4 Nuisance generated by construction activities can be significant and continuous over a long period. CoPA 1974 gives local authorities powers for controlling noise and vibration from construction sites. The Code of Construction Practice sets out the standards and procedures to which a developer or contractor must adhere in order to manage the potential environmental impacts of construction works.

8.1.5 The London Plan recognises that good design can mitigate impacts of nuisances from both internal and external sources. London Plan Policy D13 sets out agent of change principles. It requires a sensitive approach to managing change in surrounding areas and development to:

a) Ensure good design mitigates and minimises existing and potential nuisance;
b) Allow established nuisance generating uses to continue without putting restrictions on them and new noise and nuisance generating development near noise sensitive uses to adapt impact mitigation and management measures; and
c) Separate new noise sensitive uses in development from existing noise-generating businesses and uses through distance, screening, layout, sound proofing, insulation and other acoustic design measures.

8.1.6 Local Plan Policy DMP1 expects all new developments to reduce adverse pollution impacts and adapt the 'agent of change' approach. The Environmental Health service considers a range of matters that cause unfavourable conditions including:

a) Noise, vibration and dust during construction of the proposed development;
b) Noise or vibration from the operation of the proposed development;
c) Noise or vibration from fixed plant (e.g. ventilation systems);
d) Noise incidental to the proposed development (e.g. because of increased traffic/people);
e) Noise from external sources affecting the proposed development;
f) Electromagnetic frequency (EMF) including telecommunications masts;
g) Cooking fume/odour extraction, treatment and dispersion details;
h) Dust, odour, smoke, fumes, etc. from industrial developments;
i) Other causes of detriment to amenity such as light, dust, etc.
j) Air-quality issues;
k) Restrictions on hours of operation, opening, delivery and despatch;
l) Potential land contamination.

8.1.7 To best address these matters, new buildings need to be carefully designed externally and internally. Specialist consultants should be part of the project from the inception stage to plan for early mitigation of environmental nuisance. The following section sets out various key policy considerations related to:

- Noise;
- Odour;
- Dust;
- Vibration;
- Light pollution; and
- Potential land contamination.

8.2 Key Policy Consideration: Noise

8.2.1 The Noise Policy Statement for England (NPSE) applies to all forms of continuous or intermittent internal and external noise. The Noise and Statutory Nuisance Act 1993 addresses vehicles, machinery and equipment on the road and audible intruder alarms.

8.2.2 London Plan Policies D13 and D14 require new residential development to reduce, manage and mitigate noise. Applicants should include existing sources of noise in identifying overall ambient noise levels for both the current exposure and that expected in the development's lifetime. In addition to external noise, noise transmission between adjoining users, such as flats should also be considered.

8.2.3 Proposals involving noise-generating uses will need a Noise Impact Assessment (NIA) using BS 4142:2014[43] and BS 8233:2014[44] guidance. NIAs determine the impact of specific noise sources from the proposed development on noise sensitive receptors nearby (communal, residential or businesses). A Noise Management Plan will be required to effect reasonable long-term measures to reduce the impact of noise associated with the premises.

Step 1: Environmental Noise Survey Report or Acoustic Report

A baseline noise survey to measure:

- The background noise and ambient sound levels
- Identify nearest noise sensitives properties and measure noise level from the nearest noise sensitive window

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Step 2: Engage with Nuisance Control Team

- Confirm assessment methodology
- *EA engagement may be required on case-by-case basis*

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Step 3: Gather relevant source data for the proposed new installation or activity

- In case of industrial plant, confirm any measurements of plant in operation. If the plant is not yet operational, manufacturer's sound levels should be utilised

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Step 4: Determine predicted noise levels through calculation or modelling

- To determine the impact of new development on existing noise climate

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Step 5: Noise Management Plan

- Based on meeting or exceeding regulation requirement, it should set out mitigation measures
- Where relevant, provide long-term management of mitigation measure

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Step 6: Submit NIA and Noise Management Plan to LPA for approval

- At pre-application stage: submit Noise Survey Report or Acoustic Report
- At application stage: Submit Noise Management Plan with Acoustic Report

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Step 7: Adhere to planning conditions

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Step 8: Where new industry or commerce is to be introduced into an area, an environmental assessment[47] will be required as part of the planning process to include noise impacts

Certain processes will also require an EA permit. In the case of a permit, carry out an Emissions Management Plan to submit to the EA

Table 34: Noise impact assessment methodology

8.3 Key Policy Consideration: Odour

8.3.1 London Plan Policies D13, E7 and SI 8 require development on or near industrial land or waste sites to assess the resulting effects of an odour source on surrounding users. It involves assessing existing baseline odour conditions, odour sources, location of receptors, prevailing winds and magnitude of odour effects. Mitigation measures can include careful consideration of the position of a stack to avoid low-level discharge, avoiding discharge in semi-enclosed areas and other controls. Where relevant, the use of a model[45] or empirical observations as odour assessment tools is encouraged, adapting the Source-Pathway-Receptor (S-P-R) concept.

8.3.2 Commercial kitchens also result in causing significant odour. Such proposals will involve ventilation, external extraction equipment or air conditioning units and, as such, will need to submit a Ventilation Strategy and Extraction Statement. Such uses should consider the EMAQ guidance on Control of Odour and Noise from Commercial Kitchen Exhaust Systems and the IAQM Guidance on the assessment of odour for planning.

8.3.3 In some cases, an Odour Management Plan (OMP) may be required, setting out mitigation control measures. This is likely where there is a significant risk of odour nuisance associated with plant or process failure or where it complements control measures, such as abatement systems. The EA's guidance on Odour Management: how to comply with environmental permit also sets out advice on odour management and OMP.

Step 1: Prepare Ventilation Strategy and Extraction Statement detailing:

- Information on premises such as method of preparation and cooking, type of meal, number of meal served/day, proposed hours of operation, ventilation plant
- Internal arrangement (position, route and dimension), location of all filters and fan
- External arrangements including elevation drawings (roof plans and elevations) to show the size, location, and external appearance of plant and equipment
- Technical specifications, including noise generated and odour control compared to current levels and mitigation measures
- Measurement of distance of equipment from nearest neighbouring window
- Consider fire precautions to meet fire safety requirements

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Step 2: Provide exhaust characteristics information detailing:

- Discharge stack height: flue height to be vertical and maximise height for better dispersion and dilution of odour, flue to be unimpeded by flue terminals, minimal bends and ducting, air discharge at minimum 1m height above the roof ridge within 15m of the vent serving the commercial kitchen[48]
- System operations (extract rate, use of dampers of speed fans, dwell time of gases in carbon filtration zone, volume of the kitchen and efflux velocity)
- Odour abatement techniques (for example, Odour counteractant or neutralising system: manufacture details, chemical name and COSHH data sheets of chemical used, anticipated delivery rate
- Manufacturer specification and pre-filters product data including details of the flues, units and Electrostatic precipitators (where proposed)
- Where proposed, details of the carbon filters with product type, frequency and duration of use, volume of carbon (cubic metres), total mass of carbon in kilograms, surface area of panels exposed to exhausted air, dwell time of gases in filter and control setting and air exchange rate
- Cooker hood detailing length of appliance overhang, face velocity (metres per second), dimensions of opening hood
- Noise data: sound pressure levels at given distance, a 1/3 octave band analysis, noise level to be 10 dB(A) or greater below the measured background noise level at the nearest noise sensitive premises

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Step 3: Engage with Nuisance Control Team

- Confirm assessment methodology
- *EA engagement may be required on case-by-case basis*

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Step 4: Prepare an Odour Management Plan (OMP) (where relevant)

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Step 5: Prepare Maintenance Schedule

- Detailing cleaning, inspection and servicing depending on usage and grease production

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Step 6: Demonstrate additional control measures

- If not meeting above requirements, include further measures to reduce noise and odour

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Step 7: Submit to LPA for approval

- Preliminary statement with pre-application and final statement and with planning application

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Step 8: Adhere to planning conditions

Table 35: Ventilation and extraction statement methodology

8.4 Key Policy Consideration: Dust

8.4.1 Consideration of dust relates to the air quality (see **Chapter 2**) during and after a development's construction. It can have substantial temporary impacts; the most common impacts are increased particulate matter (PM) concentrations and dust soiling.

8.4.2 Depending on the risk of dust effects occurring, monitoring may need to be carried out during both demolition and construction activities. This will ensure that the applied mitigation measures are effective in controlling dust emissions, and that there are no significant impacts on the surrounding environment. This should be set out in a Construction Method Statement.

8.4.3 There may be instances where the development is very large and close to sensitive uses. In such cases, a Dust Monitoring Plan will be required prior to commencement. This will outline suitable and sufficient means of suppressing dust during operation.

8.4.4 Applicants should therefore provide details and/or specifications of the equipment and employ measures that mitigate the impacts of dust and fine particles generated. This needs to be in line with the GLA's Control of Dust and Emissions during Construction and Demolition SPG, 2014 and secured through planning conditions.

8.5 Key Policy Consideration: Vibration

8.5.1 Ground-borne vibration can be generated by a number of sources, including road and rail, construction activities, and various types of machinery. A Vibration Assessment may be required for developments that are located in close proximity to these. In addition, any plant installed should prevent the transmission of vibration into neighbouring premises.

8.5.2 Proposals near these locations will need to comply with BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings'. This provides methods of measuring and evaluating the frequency of continuous, intermittent and impulsive vibration. Residential development should be designed to ensure the vibration levels stated in BS 6472-1:2008 (1Hz to 80Hz) are not exceeded. It should also consider the time of day and use made of occupied space in buildings, whether residential, office or workshop.

8.5.3 Construction sites should follow BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites – Part 2 Vibration. This sets out the need for the protection against vibration of persons living and working near, and those working on, construction and open sites.

Step 1: Vibration Survey

Monitor continuous vibration to characterise:

- Vibration Dose Value (VDV)
- Peak Particle Velocity (PPV) vibration levels during day and night periods

↓

Step 2: Adhere to British Standard 6472-1

- Acceptable vibration criteria within buildings

↓

Step 3: Engage with Nuisance Control Team

- Confirm assessment methodology

↓

Step 4: Vibration Remediation Plan

- Based on meeting or exceeding regulation requirement, it should out mitigation measures
- Provide an ongoing and longer-term management of mitigation measures

↓

Step 5: Submit Vibration Assessment to LPA for approval

- Preliminary with pre-application and final version with full planning application

↓

Step 8: Adhere to planning conditions

Table 36: Vibration assessment methodology

8.6 Key Policy Consideration: Light Pollution

8.6.1 Light pollution or obtrusive lighting is artificial light that is poorly designed, excessive or misdirected. It can cause glare, intrusion, waste energy and disrupt wildlife. At the same time, lighting may contribute positively in the overall visual impact of buildings, instil public safety and bring crime prevention benefits. The benefits and disadvantages should be balanced to avoid physiological and ecological problems.

8.6.2 The Clean Neighbourhoods and Environment Act 2005 addresses the adverse impacts of artificial light pollution.

8.6.3 There are standards and guidance to mitigate obtrusive lighting. According to the Institute of Lighting Professional's (ILP) publication Reduction of Obtrusive Light GN01-21,[46] good lighting practice is the provision of the right light, at the right time, in the right place, controlled by the right system. As such, measures to reduce light pollution may include:

a) Careful choice of luminaire with the right optical distribution at the right mounting height to avoid light spilling beyond the boundary of the property;
b) Minimising glare by ensuring that the main beam angle of all lights directed towards any potential observer is not more than 70°;
c) Directing light downwards, minimising the upward spread;
d) Up lighting controlled with shields, baffles and louvres to reduce spill;
e) Uniform lighting, avoiding dark spots for safety;
f) Avoiding light spill near valuable ecological corridors;
g) Ensuring lighting systems are energy efficient, by considering energy demand and automated controls;
h) Illuminated Advertising Signage being in line with the Brent Shopfronts SPD3;
i) Lighting in sports facilities to be in line with Sport England Artificial Lighting Guidance;
j) Appointment of a lighting designer (encouraged); and
k) Domestic security lighting, in line with ILP GN09:2019: Domestic exterior lighting, getting it right.

8.6.4 Based on the environment zones outlined in the ILP guidance, parts of Brent fall into either zone E3 (suburban) or E4 (urban). The recommended maximum values of light parameters for the control of obtrusive light should fall within the light limits (see **Table 37**). To ensure that nuisance is avoided, in some cases, a Light Contour Map may be requested to show how the proposed lighting scheme will impact the surrounding residents.

Environmental Zone	Sky glow upward light ratio (ULR)/%	Illuminance in the vertical plane, E_v Lx (Lux)	
		Pre-curfew	Post-curfew
E3 Suburban	5	10	2
E4 Urban	15	25	5

Environmental Zone	Luminaire intensity (projected area A_p in sqm)		Building facade luminance pre-curfew	Sign luminance pre-curfew
	Pre-curfew	Post-curfew	Average, L (cd/sqm))	Average, L (cd/sqm)
E3 Suburban	10,000	1,000	10	800
E4 Urban	25,000	2,500	25	1,000

E_v = Vertical Illuminance in Lux - measured flat on the glazing at the centre of the window

I = Light Intensity in Candelas (cd)

L = Luminance in Candelas per Square Metre (cd/m2)

Curfew = the time after which stricter requirements (for the control of obtrusive light) will apply; often a condition of use of lighting applied by the local planning authority. If not otherwise stated - 23:00 hours is suggested

Table 37: Light limitations

8.7 Key Policy Consideration: Potential Contamination

8.7.1 New developments need to consider ground conditions and any risks arising from land instability and potential contamination. There is a duty of care attached to all contaminations. Although some contaminated sites are formally recognised as 'special sites', many are not. Potential contamination occurs where:

a) Substances causing harm to people, property, protected species and archaeological sites;
b) Pollution of surface or ground water in close proximity to drinking supplies; and/or
c) Radioactive or hazardous material produced by businesses.

8.7.2 Land contamination is likely to arise from a previous use of the site, or an adjacent site, that had an industrial activity or landfill on it at one time or another. End users affected by this may be residential, allotments, parks, schools or where there is a change of commercial or industrial footprint.

8.7.3 The NPPF and the EA set out the guiding principles on land contamination. In addition to this, the Society of Brownfield Risk Assessment (SOBRA) Assessing Risk to Controlled Waters from UK Land Contamination under conditions of Future Climate Change 2022 is also relevant guidance. Any investigation should be carried on in accordance with the principles of BS 10175:2011+A2:2017: Investigation of potentially contaminated sites, BS 8601:2013: Specification for subsoil and requirements for use and BS 3882:2015: Specification for Topsoil.

8.7.4 Based on site-specific issues, e.g. the past use of the site, the nature and extent of the contamination and the proposed end use of the site, the applicant is recommended to seek advice from the Environmental Health Services. A contaminated land condition will be attached to any development where the risk of exposure to potential contamination exists for future site users.

8.7.5 The Environment Agency should be consulted if it is possible that:

a) The pollution of surface or groundwater is involved;
b) The water environment is at risk of pollution;
c) An application is within a flood-plain area; and/or
d) Development is on a closed landfill or within 250 metres of a closed or active landfill.

8.7.6 Specialist help should be sought in determining potential contaminations, adequate site investigations and appropriate mitigation to inform the Land Contamination Assessment. No development will be allowed unless the assessment of the nature and extent of contamination has been submitted to and approved in writing by the council.

Step 1: Preliminary Risk Assessment

- Desktop study to establish former uses of the site and adjacent buildings
- Site survey to assess the potential risks from contamination on the basis of the proposed use and local circumstances
- Identify contaminants of concern
- Develop site specific conceptual model considering receptors and pathways
- Conclusions and recommendations

↓

Step 2: Adhere to British Standards and guidelines

↓

Step 3: Engage with Environmental Health services

- Confirm assessment methodology

↓

Step 4: Detailed site investigation (where necessary)

- Design sampling strategy and take samples (based on the conceptual model)
- Undertake quantitative risk assessment – compare results of sampling with appropriate standards and identify unacceptable risks
- If necessary, identify appropriate remediation options available

↓

Step 5: Remediation Strategy

- Select preferred remedial options and submit for approval
- Design and implement remedial works

↓

- Commit to long-term monitoring, maintenance and reporting on unexpected contamination

Step 6: Validation Report

- Following completion of works, compile validation report to demonstrate works have been carried out according to remediation strategy, and detail any changes that occurred

Step 7: Submit all evidence and assessment to LPA for approval

- Preliminary with pre-application and final version with planning application to secure a safe development

Step 8: Adhere to planning conditions

Table 38: Land contamination assessment

8.8 Planning to Mitigate Nuisance

8.8.1 In addition to the supporting documents listed above, an Emissions Management Plan (required by the EA for a permit) and an Environmental Assessment must also be submitted for major developments (at various stages).

8.8.2 A Sustainability Statement for major developments and a Design & Access Statement for minor developments will be expected to provide evidence proportionate to the size of the development. These should set out how the proposal has addressed issues of nuisance to minimise their effects from existing sources and prevent the creation of new effects.

8.8.3 The most common nuisance-generating activities are from commercial, industrial, construction and demolition and waste sites. Various controls can be adapted to reduce potential nuisance from site-generated activities. The following section lists recommended measures. The list is not exhaustive and applicants are encouraged to be innovative where relevant:

Mitigation Measures: Commercial and Industrial

8.8.4 Proposals for commercial or industrial activities should consider the local nuisance profile and the impacts from the proposed uses. The nuisance-generating sources most often include: ventilation systems such as a kitchen extractors; air-conditioning units; heat pumps; industrial processing plant; operational vehicles; generators; nurseries and schools or entertainment-generated noise.

8.8.5 Depending on the point source, and using the guidance set out in each section above, sites should include the mitigation measures and information listed below:

a) Building Layout: impact from sources such as road traffic, railway and venues can be avoided by allowing adequate distance between the source and sensitive areas of the proposed development through building form and orientation;
b) Screening: use of less sensitive buildings, walls and landscaping closer to nuisance generating uses;
c) Internal Layout: locating non-noise sensitive rooms between the noise source and more sensitive activities;
d) Avoid stacking of conflicting uses: in order to eliminate internal noise transmission for example by not locating bedrooms below the living area of an adjoining flat;
e) Location of building services: building services such as air extraction ducting should be positioned away from sensitive windows and amenity;
f) Sound barriers: use of noise insulation techniques such as acoustic

screens or membrane, acoustic wool cavity insulation, soundproof dry wall, dense board, soundproof floor underlay and sound absorber ceiling panels;

g) Anti-social trading hours: provide sound insulation between the two properties to avoid noise nuisance and careful consideration of waste storage to preserve amenity quality;
h) Ventilation or heating equipment outside a property: heat pumps, compressors, fans, expansion valves, ducting and condensers. An ASHP must meet noise level standards set by Microgeneration Certification Scheme standard MCS 020 or either be subject to noise assessment under BS 4142:2014;
i) Neighbour amenity: ensuring safeguarding from the transmission of nuisance.

Mitigation Measures: Construction and Demolition

8.8.6 Construction and demolition projects are also a major cause of nuisance. Prior to the commencement of the development a Demolition and Construction Management Plan will be required. This should include a Demolition and Construction Method Statement, Demolition and Construction Traffic Management Plan and a Demolition and Construction Waste Management Plan. These will outline measures that will be taken to control dust, noise and other environmental impacts of the development.

8.8.7 A Dust Monitoring Plan will also be required outlining measures that will be taken to control dust, noise and other environmental impacts of the development.

8.8.8 Using the BS 5228-1:2009+A1:2014 guidance, sites should include mitigation measures and information listed below:

a) Temporary sound barriers: Use of acoustic screens will be used to mitigate noise where necessary;
b) Limited work hours: working hours adapted based on council's requirements;
c) Operational practices: reduce machines in intermittent use, vehicle speed limits and anti-idling, traffic management schemes, materials carefully handled and information on disruptive activities communicated to the neighbours;
d) Vibration: vibration reduced through damping effect or anti vibration mounting; specify the plant or machinery that is to be used and also that is not to be used; level of vibration that can be emitted from the premises, alternative methods in case of change in ground conditions;
e) Plant specification: acoustic enclosures for generators, electrically powered where possible and all equipment to comply with noise emission limits;
f) Positioning of plant and equipment: away from noise-sensitive receptors, lorries and dumpers to be parked away from residential properties where possible;
g) Limit demolition and reduce waste: follow circular economy principles;

h) Mitigate dust: use of rotary atomisers, vehicle speed restrictions, damping down materials, minimise drop height of materials by using chutes to discharge material, use of cover loaded vehicles and sheeting during haulage and employing particulate traps on HGVs, ensure crushing and screening machinery is located within the site boundary to minimise the impact of dust generation, installation of wheel/body washes to ensure dust/debris are not carried onto the road by vehicles exiting the site, filter extraction units before release into the atmosphere;
i) Adopt the Considerate Constructors scheme: apply competent management, efficiency, awareness of local environmental issues and above all neighbourliness during the construction process;
j) Contamination analysis, assessment, remediation and verification of the risks posed by any identified potential contamination;
k) Compliance with Code of Construction Practice;
l) Adopt sustainable ways such as collecting of rainwater to dampen down dusty areas, SuDS to collect run-off to not cause water pollution, adapt circular economy principle to reduce waste;
m) Regular monitoring: the site manager to monitor nuisance generated at site on a continuous basis;
n) Robust complaints process in place; and
o) Good levels of housekeeping on-site and staff awareness of the need to prevent nuisances.

Mitigation Measures: Waste Sites

8.8.9 London Plan Policy SI 8 requires developments proposals for new waste sites or capacity increases of existing sites to consider the nuisance impact on amenity in surrounding areas. This includes impacts of noise, odour, air quality and visual impact. Where sites are likely to produce significant nuisance, it is recommended to fully enclose them.

8.8.10 Dust from landfills/waste transfer stations, smoke and odour from incineration and pests can be some of the nuisance generated from waste. There are powers under the Environmental Protection Act 1990, Prevention of Damage by Pests Act 1949 and the Public Health Act 1936 to deal with accumulations of rubbish that may be a nuisance or have the potential to be prejudicial to human health. Waste site operators should:

a) Regularly check the site for any waste accumulations, evidence of vermin, noise or odour;
b) Ensure operations are managed in a controlled and consistent manner, and in accordance with all relevant permits, licences and registered waste exemptions;
c) Ensure good levels of housekeeping on-site and staff awareness of the need to prevent nuisances;
d) Ensure waste sites with permitted installations are subject to the EA's guidance on environmental permits. The permit and planning application may require assessment of pollution abatement equipment such as dust filters that may be noisy.

8.9 Development Management

8.9.1 The following section aims to provide a clear and consistent approach for stakeholders to meet the borough's environmental health priorities. At each planning application stage, the following will be required:

- **Phased development:** Each phase should demonstrate, through relevant assessments, compliance with the key policy considerations. All assessments to include calculations for the development as a whole and additional tables showing calculations for all phases;

- **Outline applications:** Environmental Assessment, all assessments to include an 'Implementation Plan' explaining how the key policy considerations will be secured at the detailed design and application stage. Planning conditions may secure revision to assessments as part of a Reserved Matters application in regards to a change in layout, design, use class, transport or energy strategy;

- **Pre-applications:** Preliminary Noise Survey Report/Acoustic Report, Preliminary Ventilation and Extraction Statement along with survey, Vibration Survey, Contamination Preliminary Risk Assessment including Site Investigation and Remediation Strategy;

- **Full applications:** Emissions Management Plan (for EA permit), Noise Survey Report/Acoustic Report, Noise Management Plan, Ventilation and Extraction Statement, Odour Management Plan (OMP), Demolition and Construction Management Plan, Dust Monitoring Plan, Vibration Assessment, Light Contour Map and Land Contamination Assessment.

8.9.2 The planning requirements for each type of proposed development are listed in tables below. These set out measures for:

Major Development | **Minor Development**

Change of Use | **Permitted Development**

Major Development

A Reduce exposure to noise, dust, contamination, smells, waste, light, other forms of pollution and general disturbance or detrimentally impacting on air or water quality;

B Comply with all relevant UK environmental legislation;

C Based on proposed use and scale of development, submit Noise Survey Report/ Acoustic Report, Noise Management Plan, Ventilation and Extraction Statement, Odour Management Plan (OMP), Demolition and Construction Management Plan, Dust Monitoring Plan, Vibration Assessment, Light Contour Map, Land Contamination Assessment;

D On case by case basis, an Emissions Management Plan (required by the EA for permit) and Environmental Assessment.

Minor Development

E Reduce exposure to noise, dust, contamination, smells, waste, light, other forms of pollution and general disturbance or detrimentally impacting on air or water quality;

F Comply with all relevant UK environmental legislation;

G Based on proposed use and scale of development, submit Noise Survey Report/ Acoustic Report, Noise Management Plan, Ventilation and Extraction Statement, Odour Management Plan (OMP), Construction Method Statement, Dust Monitoring Plan, Vibration Assessment, Light Contour Map, Land Contamination Assessment.

Change of Use

H Change of use of retail/commercial to takeaway with residential above should reduce exposure to noise, dust, contamination, smells, waste, light, other forms of pollution and general disturbance or detrimentally impacting on air or water quality;

I Comply with all relevant UK environmental legislation.

Permitted Development

J Prior approval will need to apply to planning to determine if prior approval will be required in relation to noise impacts of the development and contamination risks on the site.

8.10 Planning Conditions and Obligations

8.10.1 Measures required to achieve environmental health requirements, where necessary, will be secured through planning conditions. Conditions may take a number of forms depending on the nature of the development and the policy requirement triggers.

8.10.2 Should the assessments demonstrate policy compliance subject to mitigation measures, these, where necessary, will be secured via conditions or in the case of a financial contribution, through a Section 106 planning obligation.

8.10.3 Where it has not been possible to identify appropriate and adequate mitigation measures on-site, the council will agree an offsetting payment. This financial contribution methodology is set out in the council's Planning Obligations SPD.

8.10.4 Section 106 and Section 278 agreements can be used to secure financial measures where appropriate.

Planning Obligations

K Design phase:

- Defining standards of sound insulation against impact and airborne noise from the development and against external noise affecting the development;
- Ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess vibration from transportation sources;
- Requiring further details or samples of materials to be submitted and approved before work commences (or before the building is occupied);
- Works to be carried out according to the submitted plans;
- Where appropriate the requirements of a planning condition should be applied for the 'life of the development';
- Enclosure of a filter plant to reduce noise transmission to the development site;
- Any plant and ancillary equipment to installed to prevent the transmission of noise and vibration into neighbouring premises;

Planning Obligations (continued)

- A contaminated land condition for any development where the risk of exposure to potential contamination exists for future site users.

L **Construction phase:**

- Construction Method Statement and Dust Monitoring Plan prior to the commencement of the development;
- Restricting:
    - hours of operation, times of delivery and/or despatch;
    - noise emissions by imposing noise limits;
    - the effect of noise by the provision of barriers or bunds; and
- Requiring:
    - that certain types of machinery shall or shall not be used;
    - a certain type of construction shall be used;
    - operations on-site to be undertaken in a certain way;
    - noise surveys and mitigation schemes to be undertaken prior to commencement of development in accordance with the relevant standards;
    - baseline odour or bio-aerosol surveys to be undertaken prior to commencement of development; and
    - air-quality modelling to be undertaken prior to commencement of development.

M **Operational phase:**

- Restricting operations to within buildings;
- Requiring contaminated land investigations to be undertaken and remedial works carried out and verification reported prior to first occupation of the development.

8.11 Monitoring Requirements

8.11.1 To prevent a performance gap, monitoring will be required as listed below. Additional monitoring will determined on a case-by-case basis and will need to be addressed in the assessments. This will generally depend on type of planning application, existing environmental conditions on and around the site, risks from the development, and financial implications of such monitoring.

8.11.2 The data recorded will also assist the council to inform the AMR (Authority Monitoring Report) annually.

Monitoring

N Noise and/or vibration monitoring is often required for construction activities to demonstrate compliance with limits;

O Dust Monitoring Plan;

P Contamination Validation Report.

9. Appendix

9.1 Checklist

Endnotes

1 UK Green Building Council, 2020. Building the Case for Net Zero: A feasibility study into the design, delivery and cost of new net zero carbon buildings. Available from: https://ukgbc.s3.eu-west-2.amazonaws.com/wp-content/uploads/2020/09/05144621/Building-the-Case-for-Net zero_UKGBC.pdf

2 JLL, 2020. The impact of sustainability on value. Available from: https://www.jll.co.uk/en/trends-and-insights/research/the-impact-of-sustainability-on-value

3 The TRAVL system and TRICS provide information based on observed trip rates from developments monitored and updated where necessary. The TEB does not include trips generated by deliveries, servicing, taxis or HGVs.

4 See the UK Habitat Classification system (UKHab); a tool that classifies species and habitat.

5 British Standard BS 8683 can also be used to as a reference to understand the process of implementing BNG.

6 Required by the Environment Act 2021

7 BS 42021:2022 provides recommendations on selection and installation for new developments.

8 See guidance produced by the Trees and Design Action Group

9 See Right Trees for a Changing Climate

10 See Brent Food Growing and Allotments Strategy

11 See Brent Food Growing and Allotments Strategy

12 Outline guidance on appraisal documents can be found at www.agrotectur.com and Food Foundation

13 Ecotone is a transitional area with great environment

14 See Section 5.6 of Brent's emerging Residential Amenity Space and Place Quality SPD

15 See CIEEM Guidelines on EcIA

16 See CIEEM BNG Report and Audit Template

17 Home Quality Mark (2018) Technical Manual (Flood Risk)

18 The greenfield run-off rate is the run-off rate from a site in its natural state, prior to any development.

19 In accordance with the West London SFRA, areas of surface water flooding within Brent are categorised as Flood Zone 3a where predicted for up to and including a 1 in 100 year return period.

20 New Homes Policy Playbook, UKGBC 2021

21 LETI Climate Emergency Design Guide

22 Active systems use purchased energy (including electricity and natural gas) to keep buildings comfortable.

23 Mayor of London Energy Assessment Guidance

24 Mayor of London WLC Assessment LPG

25 RICS PS: Whole life carbon assessment for the built environment 1st edition, November, 2017

26 The overheating modelling may make assumptions that limit the risk of overheating by increasing mechanical ventilation flow rates, while the energy modelling decreases the rates to reduce carbon emissions.

27 Home user guides to be accessible and include information on operational and compliance aspects such as energy design, water use, recycling and waste, sustainable DIY, emergency information

28 The specified airtightness targets should follow best practice, $5m^3/hr.m^2$ for natural ventilation and $3m^3/hr.m^2$ for mechanically ventilated spaces

29 Whilst this is a renewable technology, solid biomass systems are unlikely to be approved in London due to air quality concerns.

30 See Brent Planning Obligations SPD

31 “Active” is an actual socket connected to the electrical supply system that vehicle owners can plug their vehicle into. “Passive” is where the network of cables and power supply necessary so that at a future date a socket can be added easily.

32 The Mayor has also set up a partnership with ReLondon to support LPAs to improve waste and resource management and transition to low carbon circular city.

33 See the West London Waste Authority website for information on waste services for residents of Brent Council

34 More information on Brent’s approach to Bins, rubbish and recycling and Street Cleaning can be found on the Council’s website.

35 Internal storage space refers to indoor space prior to transfer of material to external bin. External storage space refers to space supplied for storing waste to accommodate all receptacles for collection.

36 A standard list of layers is defined in LPG Table 1 with reference to RICS New Rules of Measurement (NRM) (2012) building elements.

37 Submit to circulareconomystatements@london.gov.uk, email subject: "Circular Economy Statement" followed by planning application reference

38 Project details table includes number of use types, and floor area by use class/ type. Units: tonnes per annum

39 See Circular Economy Statement LPG para 4.6. See resource: Code of Practice: Pre-development audits, BRE, July 2017

40 OneClick software uses default end-of-life scenarios

41 To evidence pioneering measures, applicants could submit as evidence product Material Circularity Index values and supporting information.

42 Regulated facilities: see the Environmental Permitting (England and Wales) Regulations 2016 (PART 1: Regulation 8)

43 British Standard (BS) 4142:2014: Methods for rating and assessing industrial and commercial sound methodology

44 British Standard (BS) 8233:2014: Guidance on sound insulation and noise reduction for buildings

45 Odour modelling tools can include Atmospheric dispersion modelling, screening models. Empirical or observational tools can include sensory sniff tests, community surveys or complaints analysis.

46 Also refer to CIE 150: 2017 Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations and CIE 126: 1997 Guidelines for Minimizing Sky Glow.

47 In line with the future requirements of the Levelling Up & Regeneration Bill, refer to Environmental Outcomes Report (EOR)

48 Where this is not possible (e.g. because of ownership or structural constraints), additional techniques will be required in order to reduce odours, such as an increase in efflux velocity and additional filters, etc.

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Brent	**Cabinet** 6th February 2023
	Report from the Director of Regeneration, Growth & Employment

Draft Residential Amenity Space and Place Quality Supplementary Planning Document

Wards Affected:	All, excluding parts of Alperton, Harlesden and Kensal Green, Stonebridge and Tokyngton where Old Oak and Park Royal Development Corporation is the Local Planning Authority
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	One Appendix A: Draft Residential Amenity Space and Place Quality SPD
Background Papers:	Brent Local Plan 2019-2041
Contact Officer(s): (Name, Title, Contact Details)	Natasha Reid Placemaking Officer 020 8937 1448 Natasha.reid@brent.gov.uk

1 Purpose of the Report

1.1 The purpose of the report is to seek Cabinet approval for consultation on a draft Residential Amenity Space and Place Quality Supplementary Planning Document (SPD).

1.2 Cabinet will also be requested to delegate authority to the Corporate Director for Communities and Regeneration 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 Residential Amenity Space and Place Quality SPD.

2 Recommendations

2.1 Cabinet approves the Draft Residential Amenity Space and Place Quality Supplementary Planning Document (SPD) as set out in Appendix A to be issued for statutory public consultation.

3 Detail

3.1 The Residential Amenity Space and Place Quality Supplementary Planning Document (SPD) sets out further guidance on the implementation of two Brent Local Plan 2022 policies: BH13 Residential Amenity Space and BD1 Leading the Way in Good Urban Design. The draft SPD has been brought forward following an evidence review of the implementation of the policies. This identified the need for further clarity to address how any shortfalls against the private amenity standard for individual dwellings could be provided through shared communal space. For higher density development in Brent, greater guidance is also required on the necessary quality of communal space, particularly in cases where provision would be below the minimum size standard.

Overview

3.2 The Residential Amenity Space and Place Quality SPD clarifies the borough's expectations for well-designed places. It supports the Brent Local Plan's objectives to ensure that new homes and neighbourhoods are designed to provide a high quality of life. This is for existing and future residents across the borough's different environments, scales of development and densities.

3.3 It is important to point out that the SPD does not create new policy, it simply provides guidance and information on the implementation of existing Local Plan policies in relation to residential amenity and good urban design.

Scope of impact

3.4 It covers a wide range of amenity space types and sizes. It addresses; outdoor private amenity space; outdoor shared amenity space; and indoor shared amenity space and common spaces. It may also be used to determine the quality of public space where relevant to the assessment of a scheme.

3.5 As such it has the scope to impact the majority of shared spaces within new residential developments. These spaces are a significant factor in the quality of development. They are key to the way new and existing residents experience their homes, neighbourhoods, and a sense of community. People's quality of life is directly affected by their environment. High quality environments are beneficial to health, wellbeing and social cohesion. Poor quality environments are not; they exacerbate existing inequalities.

3.6 The objective of the SPD is to provide a clear roadmap for proportionate expectations for different types and scales of development which contribute towards improving people's quality of life. It will be a material consideration in determining planning applications.

Structure

3.7 There are six sections in this SPD:

- Sections 1,2 and 3 address technical and qualitative principles relevant to all development;
- Section 4 addresses minor development;
- Section 5 sets out a new Place Quality Framework, for major and strategic development;
- Section 6 addresses specific typologies such as high-density development and Build to Rent.

3.8 The SPD signposts to relevant guidance in the draft Sustainable Environment and Development SPD which it is anticipated will be consulted on concurrently. The full contents list is in the draft SPD in Appendix A.

Exemplary guidance, innovation and industry context

3.9 The guidance goes beyond the scope of typical SPD design guidance by introducing a new "Place Quality Framework". This sets out a new system for the assessment of design quality which is purposefully framed to health, wellbeing, social sustainability and quality of life outcomes.

3.10 This new approach responds to increasing evidence, acknowledgement and consensus on the significance of the impacts that the built and natural environment have on people, as described by the social determinants of health. Brent's Local Plan Development Vision of Good Growth identifies the following related objectives:

- Improving physical and mental wellbeing for residents by adopting a health-integrated planning approach;
- Reducing health inequalities through focusing on narrowing the gap between the most affluent and the most deprived areas of the borough; and
- Reducing spatial inequalities within Brent and incidences of areas with high levels of multiple deprivation by promoting mixed and balanced communities.
-

3.11 The new framework additionally builds on emerging recommendations from DLUHC with regards to:

- **Emerging draft guidance from the Office of Health Improvement and Disparities** (to be published early 2023) on design coding for health disparities;

- **DCMS emerging strategy for "Tackling loneliness in the built environment"** and how design codes can be used to create more cohesive communities.

3.12 Subject to full benchmarking and review, it is anticipated the SPD will be exemplary and timely guidance which:

- Builds on the emerging national recommendations set out above, to provide new approaches for direct application to industry that support the promotion of health, wellbeing and quality of life through well-designed places;
- Provides next steps to translate evidence into action; going from the "what" to the "how";
- Purposefully foregrounds the human experience and health inequalities to enable specific action and address local challenges;
- Encourages the adoption of evidence-informed design strategies and solutions;
- Encourages dialogue across different disciplines, sectors and types of participants with a common language focused on the quality of place, not only the design or quantitative metrics; and
- Highlights the importance of co-benefits across health, community and sustainability through green infrastructure.

Benefits of the new approach

3.13 The new 'Place Quality Framework' has been shaped to reflect local priorities and emphasise principles of equity through Good Growth in Brent. It provides an overarching reference point for good design that goes beyond physical form and visual aesthetics to prioritise people-focused outcomes. These include:

- supporting people's physical and mental wellbeing,
- building strong and integrated communities across new and existing places,
- encouraging vibrancy and intergenerational mixing,
- supporting a sense of place and belonging, and
- fostering a sense of ownership and empowerment.

3.14 The overall framework has three dimensions – health and wellbeing; community and belonging; and vibrant and inclusive places. There are nine qualitative criteria based on human experience considerations. These criteria act as "building blocks" for people-focused places and include example design considerations framed as questions that help identify opportunities for positive impacts.

Impacts

3.15 Overall, the toolkit shifts expectations for development; by offering qualitative considerations in relation to the human experience of the built and natural environment and its impacts on lives. This:

- Enables a greater clarity when identifying the qualities (or deficiencies) of development proposals and how the benefits of growth are balanced more equitably.

- Sets out specific design considerations in direct relation to quality of life outcomes, to assists the work of designers, planners and decision-makers.
- Allows for a clearer consideration of the complex impacts of the built environment and its importance in improving health inequalities, isolation, social cohesion, community participation and inclusivity.
- Promotes a collaborative approach for pre-application discussion and engagement.

3.16 It will be applied to all developments larger than 10 dwellings, and as such will have a significant impact in the borough. It has been developed for ease of application, to support use by different types of users and across a range of development contexts.

Addressing health inequalities

3.17 This SPD emphasises the importance of considering quality of life impacts for groups who may experience greater challenges to their health and wellbeing. It encourages a contextual response to high levels of multiple deprivation and different demographic groups. This aims to maximise the positive impact that equitable access to high quality shared spaces can have for individual and social wellbeing.

Wider application

3.18 The Place Quality Framework can be used to inform the following emerging guidance and processes:

- Approach to Design codes, regarding health promotion, health inequalities and tackling loneliness.
- Community engagement processes.
- Design review processes by the Quality Review Panel.

Internal engagement

3.19 Engagement has occurred internally with Spatial Planning and Transport, Development Management, Policy and through the Major Cases Forum, shaping the final contents. All are positive about the document and recognise its intention to improve quality of life through the design of places.

3.20 The SPD reflects the intentions of the Brent Youth Strategy, such as the vision for “spaces and places where young people can be together, have fun and feel like they belong” and the key theme of “Places and Facilities”. This SPD emphasises the importance of shared spaces for young people as a “Place Quality Priority” and will contribute to ensuring these are delivered. The SPD is supported by the Director for Children and Young People.

Benchmarking and review

3.21 Benchmarking to key national guidance documents has been undertaken and analysis of relevant local authority guidance is in progress, such as Essex’s

LiveWell accreditation. Further internal and external review can potentially include:

- A formal review by the Brent Quality Review Panel. *Initial informal feedback from the new Brent Quality Review panel was highly supportive of the proposed approach.*
- Initial discussions with developers to test the toolkit through pre-application schemes, and further feedback from DM officers.
- Expert review through existing professional networks in healthy places practice

Options

3.22 There are essentially two options open to the Council:

a) Do not take forward a draft Residential Amenity Space and Place Quality SPD, or

b) Take forward a draft Residential Amenity Space and Place Quality SPD

Do not take forward a Residential Amenity Space and Place Quality SPD

3.23 In this scenario, the Council is likely to receive a number of planning applications for development which requires further guidance on the implementation of residential amenity space policy. Where there may be shortfalls on quantity, the qualitative expectations may need to be addressed prior to determination through additional material being submitted and associated extensions of time for the application to be determined with the applicant. There will also be no detailed advice to applicants on the Council's interpretation of its Local Plan policies. This may result in delay and confusion for the applicant. Lack of clarity over interpretation of policy could also lead to more appeals as applicants might challenge the Council's interpretation of policies used as reasons for refusal.

3.24 There is no detailed guidance on the implementation of policy BD1 Leading the Way in Good Urban Design in relation to health, wellbeing and social sustainability. Therefore these aspects will not be clearly prioritised in development and growth in the borough, resulting in less opportunity for improving quality of life and quality of place for residents. There is no guidance on improving health inequalities so there is limited opportunity to integrate this objective into the assessment of the design quality of a development.

Take forward a Residential Amenity Space and Place Quality SPD

3.25 In this scenario, it is likely that the Council receive a higher proportion of planning applications for a better standard of developments that ultimately it can approve. This is because applicants will have clarity on the expectations for the qualitative aspects of amenity spaces and the breadth of impacts expected to be addressed. There will also be no detailed advice to applicants on the Council's interpretation of its Local Plan policies. The SPD will identify the key issues that applicants need to consider. Applicants therefore will be

able to better understand the potential risk in submitting an application. This will reduce wasted resource from the applicant and Council as it is likely to result in fewer refusals and then re-submission to address refusal reasons. It will also reduce appeals, as Council's interpretation of policies used as reasons for refusal will be clear.

3.26 Detailed guidance is provided on the implementation of policy BD1 Leading the Way in Good Urban Design in relation to health, wellbeing and social sustainability. Therefore these aspects will be clearly prioritised in development and growth in the borough, resulting in improved quality of life and quality of place for residents. Guidance on improving health inequalities will contribute to integrating this objective into the assessment of the design quality of a development.

3.27 Taking account of the negative and positive impacts of the options, Option B is recommended, with the draft SPD as set out in Appendix A issued for consultation. Ultimately if adopted, the SPD will improve planning outcomes and reduce wasted resource. A consultation on the draft will allow suitable engagement which will encourage feedback on the document. This is likely to improve its quality in achieving its outcomes.

4 Financial Implications

4.1 No implications as a result of this report.

5 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 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 An Equalities Impact Screening has been undertaken. This analysis identifies that the Residential Amenity Space and Place Quality SPD has the potential for

positive equalities impacts for people of all ages, people with disabilities, BAME communities, women and other protected characteristics identified.

7 Consultation with Ward Members and Stakeholders

7.1 The Cabinet Member for Regeneration and Planning has been briefed on the development of this SPD. It was also presented to the Local Plan Members Working Group in October 2022, and their feedback has been incorporated into the final draft document.

7.2 Statutory public consultation (following cabinet approval in February) will provide further opportunities for engagement with partners, stakeholders, local residents, businesses and communities. There will be opportunity for Public Health to engage as well as social prescribers.

7.3 To advance the draft Residential Amenity Space and Place Quality 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 Residential Amenity Space and Place Quality SPD is made available for public consultation for a period of 6 weeks. Subject to consideration of all consultation representations and any necessary amendments, the final Residential Amenity Space and Place Quality SPD would then be adopted.

Report sign off:

Alice Lester
Director Regeneration Growth and Employment

Residential Amenity Space & Place Quality

Draft **Supplementary Planning Document**

February 2023

Brent

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Brent Council www.brent.gov.uk

Acknowledgements

The Place Quality Framework and Toolkit has been developed by Natasha Reid, on behalf of Brent Council, as a version of her "Human Performance Framework" that centres human experience as the driver for design:

Reid N. Compassionate Spaces. Conscious Cities Anthology 2019: Science-Informed Architecture and Urbanism. 2019" ©2019

The Residential Amenity Space and Place Quality SPD has been developed with the input of many people and we would like to thank all contributors for their advice, support and feedback.

Consultation Statement

This draft Supplementary Planning Document (SPD) will be subject to a 6-week period of consultation. This will take place between X February and X April 2023. Consultation will be consistent with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement (SCI).

The document will be made available on the council's website, as well as in Brent Council libraries. The Council will promote it through general awareness raising undertaken through media releases, its social media pages and on its website. In addition, the council will notify all relevant people and organisations on its planning policy consultation database. It will also make all landlords in the borough registered with it, aware of the consultation.

Representations on the document can be made to: planningstrategy@brent.gov.uk. Alternatively, you can write to: Paul Lewin, Team Leader Planning Policy, Brent Council, Civic Centre, Engineers Way, Wembley HA9 0FJ. Representations should be received by the council by midnight X April 2023. Please reference the appropriate section and paragraph of the document for each individual comment that you make. Please note that the council will not register anonymous responses. You should provide your name and if relevant, the organisation that you are working for, and that which you might be representing.

When reporting the consultation responses, organisation names will be referenced by the council. However, no individual's name or personal details of respondents will be made publicly available. Please can you indicate with your response whether you wish to be informed by the council of whether this document is adopted. Please also indicate if you would like to be informed of other planning policy consultations by having your details put on our planning policy consultation database. This information will only be used in relation to consultations on the council's planning and associated documents. Unless you indicate that you want to be put on this database, your personal details will only be kept until the council makes a decision on whether to proceed with the adoption of the SPD or not and has subsequently issued the appropriate notifications. Please see our privacy policy for more details.

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1. Introduction

1.1 Overview

1.1.1 The Residential Amenity Space and Place Quality Supplementary Planning Document (SPD) sets out further guidance on the implementation of two Brent Local Plan 2022 policies: BH13 Residential Amenity Space and BD1 Leading the Way in Good Urban Design.

1.1.2 It clarifies the borough's expectations for well-designed places. It supports the Brent Local Plan's objectives to ensure that new homes and neighbourhoods are designed to provide a high quality of life.[1] This is for existing and future residents across the borough's different environments, scales of development and densities.

1.1.3 It covers a wide range of amenity space types and sizes. It addresses:

- Outdoor private amenity space;
- Outdoor shared amenity space; and
- Indoor shared amenity space and common spaces.
- It may also be used to determine the quality of public space where relevant to the assessment of a scheme.

1.1.4 Its application will depend on the scale and nature of a development. It relates to spaces including, but not limited to: balconies; terraces; gardens; landscaped areas; courtyards; roof terraces; communal gardens; entrance lobbies; internal shared spaces and corridors.

1.1.5 As such it has the scope to impact the majority of shared spaces within new residential developments. These spaces are a significant factor in the quality of development. They are key in the way new and existing residents experience their homes, neighbourhoods, and a sense of community.

1.1.6 People's quality of life is directly affected by their environment. High quality environments are beneficial to health, wellbeing, social cohesion. Poor environments are not; they exacerbate existing inequalities.[2]

1.1.7 There are six sections in this SPD:

- Sections 1, 2 and 3 address technical and qualitative principles relevant to all development;
- Section 4 addresses minor development;
- Section 5 sets out a new Place Quality Toolkit, for major and strategic development.
- Section 6 addresses specific typologies such as high-rise, high density development and Build to Rent.

Assessing Design Quality Through Quality of Life Outcomes

1.1.8 There is already an established understanding of the relationship between the built and natural environment and people's physical and mental health and wellbeing.[3] Strong evidence demonstrates that place matters when it comes to quality of life.[4]

1.1.9 This guidance sets out a new 'Place Quality Framework and Toolkit' for major development. This purposefully frames the assessment of design quality through quality of life impacts related to health, wellbeing, social sustainability and inclusivity. It has been shaped to reflect Brent's priorities and emphasise principles of equity through Good Growth in Brent.

1.1.10 This SPD draws on local, national and international guidance focused on the relationship of spatial planning and design to health, wellbeing and quality of life. A list of reference documents can be seen in **Section 7**.

1.1.11 The Place Quality Framework provides an overarching reference point for good design. It goes beyond physical form and visual aesthetics to prioritise people-focused outcomes. These include: supporting people's physical and mental wellbeing; building strong and integrated communities across new and existing places; encouraging vibrancy and intergenerational mixing; supporting a sense of place and belonging; and fostering a sense of ownership.

1.1.12 It helps shift expectations for development, by offering a series of qualitative considerations in relation to the human experience of the built and natural environment, and its impacts on lives. In this way, the framework and toolkit enables a greater clarity when identifying the qualities (or deficiencies) of development proposals and how the benefits of growth are balanced more equitably.

1.1.13 The toolkit sets out specific design considerations, directly related to people-focused and socially-conscious outcomes. This assists the work of designers, planners and decision-makers. It allows for a clearer consideration of the complex impacts of the built environment and its importance in improving health inequalities, isolation, social cohesion, community participation and inclusivity.

1.1.14 The higher the density of development, typically the more challenging quality of life outcomes are to achieve. Similar to the London Plan[5], this SPD puts emphasis on greater scrutiny and expectation, the denser a development is. It also emphasises the importance of considering quality of life impacts for groups who may experience greater challenges to their health and wellbeing. It encourages a contextual response to high levels of multiple deprivation[6] and different demographic groups. This aims to maximise the positive impact that equitable access to high quality shared spaces can have for individual and social wellbeing.

Figure 1: Place Quality Framework and Toolkit

Source: Based on Natasha Reid 2019[7]

1.2 Using this Guidance

Who Does this Guidance Impact?

1.2.1 The beneficiaries of this guidance are primarily the households, families and individuals that will occupy the living accommodation associated with residential amenity space. It also sets out wider considerations to ensure the impacts and benefits of new development are understood for all those who may be affected in a community; this can contribute to addressing inequalities.

1.2.2 **Section 2** sets out the diversity of Brent's population and key challenges for the borough. There will be an expectation of an understanding of who the amenity space is being provided for. There should be a recognition that households and communities contain a variety of different people. E.g. different age groups, disabled people, people with a variety of sensory requirements as well as different socio-economic factors and race.

1.2.3 Innovation and careful attention to these factors is welcomed. The Place Quality Framework supports the users of this guidance to take a holistic and tailored approach to design solutions. It considers the specific needs of people in the context of specific places.

Who Uses this Guidance?

Applicants and agents: This SPD is to be used by developers, design teams and consultants in shaping development proposals and preparing planning application submission material.

Local Authority officers and decision-makers: This SPD will inform pre-application discussions and be used to assess planning applications to ensure the relevant design principles have been incorporated.

The Brent Quality Review Panel (QRP): This SPD can help support design quality discussions and feedback during QRP reviews.

When to Use this Guidance

1.2.4 This SPD is to be used as early as possible in the design process. This will help to ensure schemes are developed in line with requirements and avoid re-designs.

- **Pre-Application**
  - Minor development: provide a preliminary Amenity Space Quality Statement (see **Section 4**);
  - Major and strategic development: provide a preliminary Amenity Space Quality Statement and evidence base using the Place Quality Toolkit (see **Section 5** and **Section 6**);

- **Planning Application**
  - Minor development: provide an Amenity Space Quality Statement (see **Section 4**);
  - Major and strategic development: provide an Amenity Space Quality Statement and evidence base using the Place Quality Toolkit (see **Section 5** and **Section 6**);

- **Post-Planning**
  - Planning conditions and potentially S106 obligations may be required to ensure that high quality design is secured.

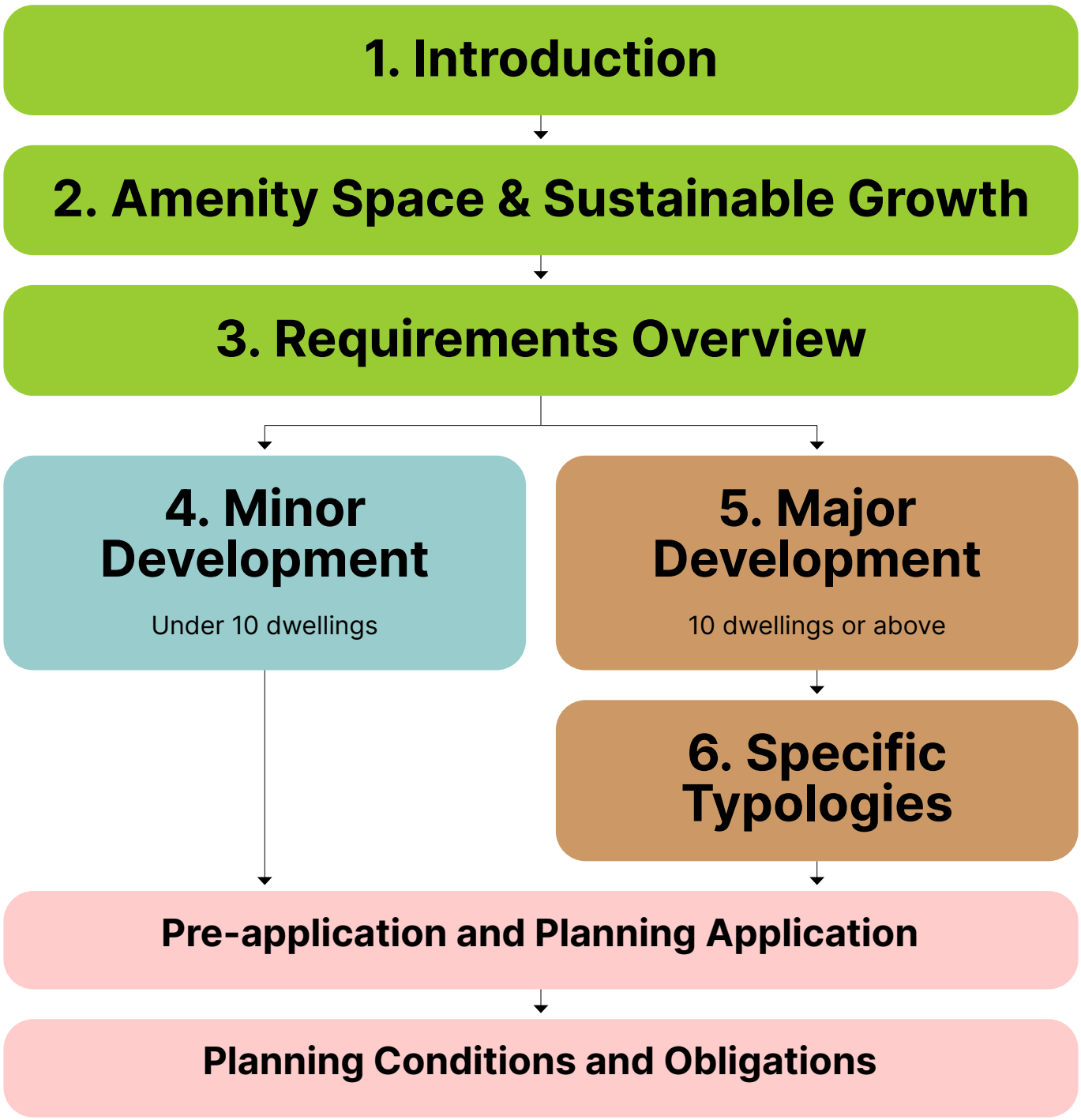


Table 1: Document road map for different sizes of scheme

2. Amenity Space & Sustainable Growth

15A

2.1 Good Growth and Quality of Life

2.1.1 In common with much of London, Brent's population has grown significantly. Between 2001 and 2021 it grew by 25% to 329,800. It is anticipated that it will grow by another 56,000 by 2041. Brent's population density is the highest of any outer London borough and the 14th highest in England.[8] With a limited land supply, and competing demand, space is becoming more of a premium. Development needs to be a higher density to meet the need for homes. The council has placed a greater emphasis on improved design in recognition of this challenge and the value good design creates in improving quality of life.[9] It has led by example on its developments, such as the award-winning regeneration of South Kilburn.

2.1.2 The borough has other challenges. It is the most diverse borough in the country[10] and to address the inequalities affecting this demographic, the borough established the Black Community Action Plan in 2020. Overall, Brent is also one of London's more deprived areas, but, like many London boroughs, there are areas of both affluence and deprivation.

2.1.3 Whilst the population profile of Brent is relatively young (67% of the population are of working age), poverty rates are particularly high for young Brent residents. One study has found that for every five children in Brent, two will be in poverty.[11]

2.1.4 Health is another key challenge. For example, 38% of children aged 10-11 are classified as overweight or obese. 33% of the population are inactive, which is amongst the highest in England.[12] Currently when compared to London standards, overall the borough lacks open space, particularly in the south. The quality of provision also varies and the growth in population will provide additional challenges with regards to accessibility standards.[13] The Brent Local Plan identified that there will be a need to provide mixed and balanced communities. This will build better social cohesion and improve resident health and quality of life.[14]

2.1.5 The Brent Local Plan Development Vision of Good Growth includes "Creating a healthy borough" and "Strong and inclusive communities" with identified objectives such as;

- Improving physical and mental wellbeing for residents by adopting a health-integrated planning approach;
- Reducing health inequalities through focusing on narrowing the gap between the most affluent and the most deprived areas of the borough; and
- Reducing spatial inequalities within Brent and incidences of areas with high levels of multiple deprivation by promoting mixed and balanced communities.

2.1.6 This SPD provides further guidance to help the council deliver its vision and policies. It will support existing communities and new residents to make their home within liveable, mixed, inclusive and cohesive neighbourhoods. This will contribute to a higher quality of life.

2.1.7 Amenity space and shared public spaces can contribute significantly to the quality of built environments. This is because the spaces between buildings and homes affect people's experience of a place.[15] The quality of shared spaces can contribute to sharing the benefits of development. Both their design and the activities they support can help address deprivation, health inequalities and tackle social segregation.

2.1.8 To achieve this, the guidance sets out how new development can support Good Growth in Brent by contributing to the creation of environments focused on quality of life. With Brent's diversity of population, increased interaction between people from different cultural backgrounds can contribute towards strong and inclusive communities. It can also support social cohesion.

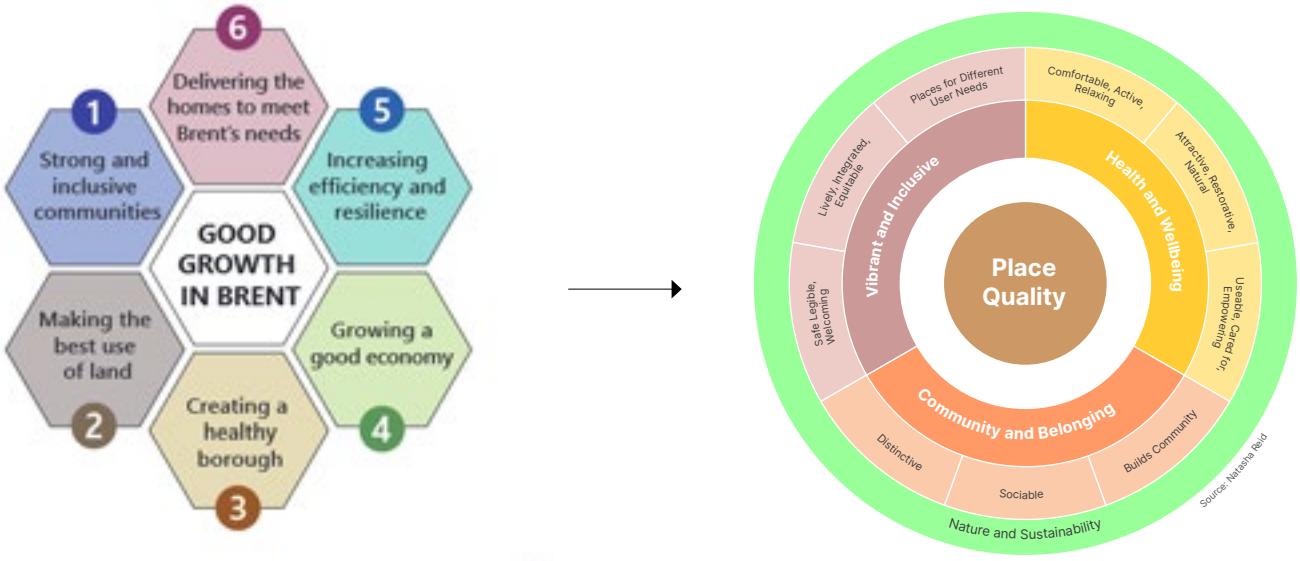


Figure 2: Good Growth in Brent implemented through the Place Quality Framework and Toolkit

2.2 Reducing Health Inequalities Through Design

2.2.1 Development will be expected to respond to local challenges of inequalities and the potential opportunities in Brent. An informed understanding of the levels of needs of different communities and specific groups must be reflected in the design, quality and provision of amenity space in major development.

2.2.2 The planning and design of the built and natural environment can reduce health disparities between different groups and health outcomes. This is particularly important for those affected by socio-economic status and deprivation, protected characteristics, and the more vulnerable groups of society.[16]

2.2.3 Those living in the most deprived neighbourhoods are exposed to a greater set of socio-economic and environmental conditions detrimental to health.[17] There, poorer health status is generally observed.[18] People living in less or more deprived communities within a few miles of each other can experience over 10 year differences in life expectancy.[19] These effects can be more profound for those most vulnerable with less influence, who are often disproportionately disadvantaged by a poor built environment.[20]

2.2.4 To achieve equitable outcomes for all, design must address the levels of need for specific places, communities or populations. This must be in a way that is proportionate to the level of disadvantage and depending on need.[21] (See **Section 5**)

2.2.5 It is important to consider how the design of places influences how different people and groups experience the environment. This can help to understand how the environment impacts differently on people's behaviours, resulting in different health outcomes.[22] Community involvement can help identify the requirements of a specific area or cultural context. It is strongly encouraged, particularly in areas of deprivation and for groups affected by socio-economic inequalities, including the Black community.

2.2.6 This wider socio-economic and cultural context would usually be expected to be considered in decision making (see **Section 5.7**).

2.3 Sustainability and Green Infrastructure

2.3.1 Green spaces and other green infrastructure is fundamental for both sustainability and people's quality of life. The provision and quality of external amenity space supports the delivery of these key objectives.

2.3.2 The Brent Local Plan sets out the role of green infrastructure in providing multifunctional benefits. It can improve physical and mental health, increase biodiversity, provide recreation, assist in supporting environmental resilience and address the impacts of climate change.[23] National policy recognises the importance of access to outdoor open space for health and wellbeing benefits.[24]

2.3.3 London Plan 2021 Policy GG3 'Creating a healthy city' outlines how those involved in planning and development must ensure the wider determinants of health are addressed in an integrated and coordinated way. It sets out the need for a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities (Part A). They must also assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities. This is to mitigate any potential negative impacts and maximise potential positive impacts, to help reduce health inequalities (Part D).

High Quality Amenity Space

2.3.4 Green space can be a community resource that encourages social interaction, contact with nature and active outdoor participation. It can help create safer and stronger communities, improve the image of an area and instil sense of pride through many co-benefits that help to support quality of life.

2.3.5 The borough's urban character, limited land availability and significant population growth[25] means that green infrastructure is of great importance and benefit to new and existing communities. The provision of high-quality amenity space can contribute to this.

2.3.6 Amenity space can accommodate a range of cultural activities such as, outdoor eating, performance space, various visual and sculptural art forms, and water features.

Food Growing and Community Gardening

2.3.7 There are many cross-cutting benefits attached to food growing opportunities. Such opportunities are likely to exist in many amenity spaces and the provision of areas that support these are therefore encouraged. The benefits include improved food security, education, biodiversity, social interaction and mental and physical wellbeing.[26] The emerging Sustainable Environment and Development SPD sets out further details as a key policy consideration (Section 3.8) to encourage the development of food growing and community gardening projects. This is in line with the Brent Poverty Commission recommendations[27] and guidance on stewardship in **Section 3.5** of this SPD.

2.3.8 This can also provide opportunity to include a sensory garden with smell, taste, touch, sound and visual senses all being triggered. The design of inclusive, sensory-friendly environments to respond to a variety of needs is encouraged.

Please refer to the emerging Sustainable Environment and Development SPD for full technical guidance on green infrastructure requirements.

3. Requirements Overview

3.1 Policy Requirements

Policy BH13 Residential Amenity Space

All new dwellings will be required to have external private amenity space of a sufficient size and type to satisfy its proposed residents' needs. This is normally expected to be 50sqm per home for family housing (3 bedrooms or more) situated at ground floor level and 20sqm for all other housing.

Para 6.2.98 New developments should provide private amenity space to all dwellings, accessible from a main living room without level changes and planned to take maximum advantage of daylight and sunlight.

Where sufficient private amenity space cannot be achieved individually for each dwelling to meet the full requirement of the policy, the remainder should be supplied in the form of communal amenity space.

In some locations, such as town centres, in high density developments the council understands that meeting the overall minimum might be challenging. Whilst amenity space will assist in achieving the urban greening factor targets, other requirements such as renewable energy sources may compete for areas that might otherwise accommodate amenity areas, such as roof space. As such flexibility could be allowed where it can be shown that all reasonable options for provision have been considered.

In these cases, the quality of any communal space will need to be particularly high to show it can meet residents' needs. Where not meeting the standards, developments will need to demonstrate how the level of amenity space provided is considered to be acceptable taking into account factors such as, accessibility of dwellings to their own amenity space and its quality, the amount and quality of communal space, proximity to other areas of open space nearby and internal amenity spaces.

The calculation of amenity space does not include any parking, cycle or refuse and recycling storage areas.

Refer to the Brent Local Plan for further details

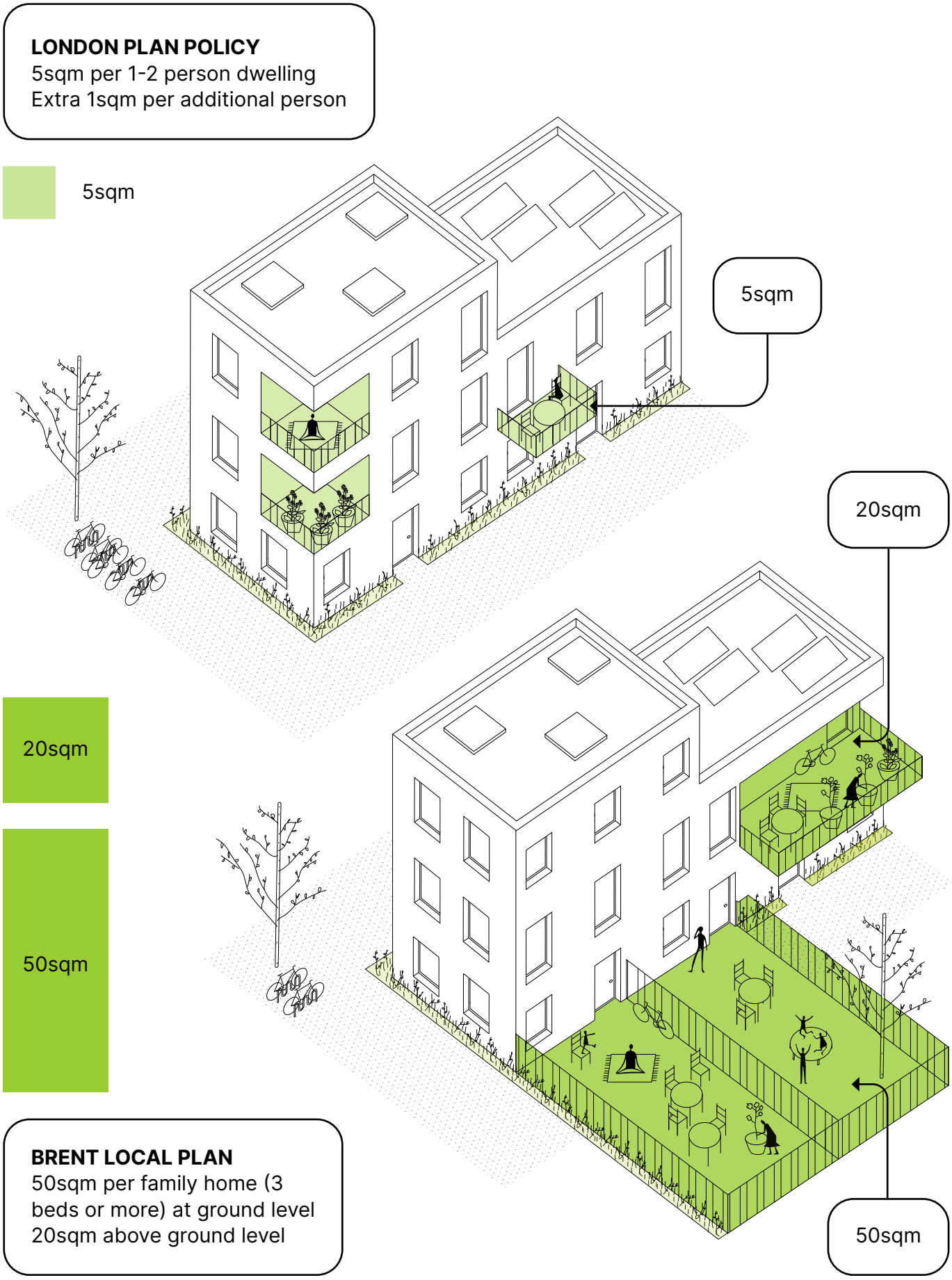


Figure 3: London Plan and Brent private amenity space standards comparison

3.2 Private Amenity Space Requirements

3.2.1 Outdoor private amenity space contributes to a sense of space and openness in the home and provides usable area for enjoyment. It is expected that each home's private amenity space complies with Brent Local Plan Policy BH13. Where the full area requirement cannot be provided, at least part of each dwelling's required amenity space will be private space and comply with London Plan policy as a minimum.

3.2.2 Requirements:

- Private amenity space to all dwellings;
- Accessible from a main living room;
- No level changes;
- Planned to maximise daylight and sunlight;
- Minimum depth and width of 1.5m[28] if not compromised by door swings;
- Practical in terms of its shape and utility[29]; and
- Have a balance of openness and enclosure, appropriate for its outlook and orientation[30].

3.2.3 Expectations:

- **Environmental requirements:** With regards to light, noise and pollution (see **Section 3.4**);
- **Usability:** Sufficient size and shape to lay out tables and chairs or to make use of the spaces comfortably, taking into account door swings and circulation;
- **Privacy:** Provides a sense of enclosure;
- **Outlook, visual amenity and drainage:** Where possible, orientated towards open spaces and natural views. Enclosed spaces with no outlook, such as small light-wells, are not usually acceptable Avoid flooding and dripping onto balconies below to support the occupants' use and enjoyment of the space; and
- **Orientation to communal amenity and outdoor spaces:** Where possible, for natural surveillance and sense of community.

Contextual and Qualitative Assessment

3.2.4 All assessments are made in the context of the site, scheme and wider area. They will need to balance the benefits and the specific factors that are relevant on a case-by-case basis. In exceptional cases, it may not be possible to provide external amenity e.g. where balconies would impact daylighting, urban form or cause other adverse impacts.

3.2.5 Where external private amenity space cannot be provided, this may be mitigated by a higher provision and quality of internal space, above minimum nationally described space standards. Additional internal space is usually expected to be equivalent to London Plan private amenity area requirements as a minimum. In such cases, the overall living conditions will be considered on balance. A lack of external private amenity space may also be mitigated by the provision and quality of communal amenity.

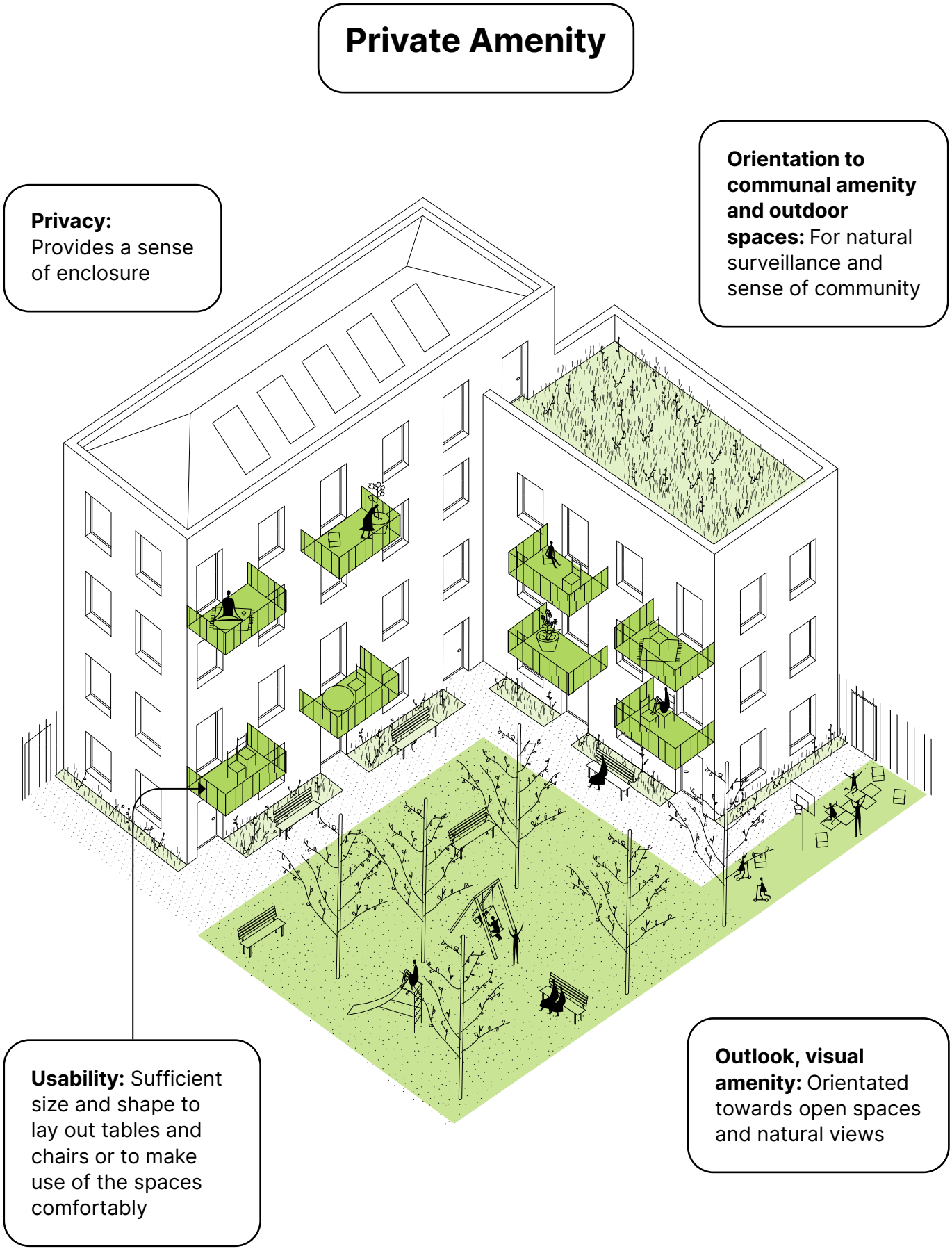


Figure 4: Private amenity space

3.3 Communal Amenity Space Requirements

3.3.1 In certain cases, schemes may be reliant on high quality communal amenity space to reach the full area policy requirement. This section defines what counts as communal amenity space as a minimum threshold for all schemes. Further guidance for different sizes and types of development is found in **Section 4** and **Section 5**.

3.3.2 Well-designed shared amenity spaces feel safe and secure for their users. They are social spaces providing opportunities for comfort, relaxation and stimulation (including play) for residents, regardless of the type or tenure of homes. They are well-overlooked and easily accessible for all the residents who share them.[31]

Design Quality Principles

3.3.3 Communal amenity space should:

- Be usable, beneficial and enjoyable to residents;
- Meet residents' changing and diverse needs, such as outlook, privacy, and providing a safe and attractive environment;
- Provide sufficient space to meet the requirements of the number of residents;
- Be easily accessed from all related dwellings;
- Be located to be appreciated from the inside;
- Be positioned to allow overlooking;
- Support an appropriate balance of informal social activity and play opportunities for various age groups;
- Be inclusive and accessible for all, including wheelchair access; and
- Meet environmental requirements regarding light, noise and pollution (see **Section 3.4**)

3.3.4 London Plan Policies D5 and D6 give further details on communal amenity space and inclusive design requirements. It is expected that all amenity spaces are accessible to residents regardless of tenure, in line with the National Design Guide.[32]

What Is Not Included?

3.3.5 Spaces that are not usable, beneficial and enjoyable to residents are not typically included as amenity space. Typical exclusions from area calculations may include, but not be limited to:

- Unusable space e.g. thin strips of planting, though these may contribute to visual amenity;
- Inaccessible, isolated or hard to reach spaces;
- Enclosed space without outlook e.g. light-wells;
- Space abutting residential windows and facades;
- Defensible space and planted buffers, though these may contribute to visual amenity;
- Paths or circulation space bounding an amenity space;
- Sloped areas, though these may contribute to visual amenity; and
- Exposed areas e.g. areas that are exposed to high levels of traffic movement and thus poor noise and air quality unless that can be adequately mitigated

3.3.6 Buffer zones and thresholds between private and communal amenity spaces are not counted in the qualifying area. They will however, be considered in determining the privacy and quality of the spaces they bound.

Visual Amenity

3.3.7 Areas considered as visual amenity are not included in communal amenity space area calculations. They may contribute to the overall visual amenity if details are provided to evidence the quality of these spaces.

Privately Owned Public Space

3.3.8 Privately owned public space (POPS) is not counted in the communal amenity space calculation. It may however be used to support the justification for a lower provision of amenity space. It has potential benefits for quality of life, community and green infrastructure (see **Section 5.4**).

Contextual and Qualitative Assessment

3.3.9 All assessments are made in the context of the site, scheme and wider area. They will take account of the benefits and the specific factors which are relevant on a case-by-case basis.

3.3.10 Examples of areas not typically included, but that may be considered acceptable subject to the design are:

- Front gardens: if deemed sufficiently private and of suitable quality, through factors such as; significant separation from the street, positions of entrances and access routes and boundary treatment e.g. the height of walls; and
- Spaces within proximity of highways: dependent on noise and privacy.

London Plan Policy D6 Housing quality and standards

Communal outside amenity spaces should:

- Provide sufficient space to meet the requirements of the number of residents;
- Be designed to be easily accessed from all related dwellings;
- Be located to be appreciated from the inside;
- Be positioned to allow overlooking;
- Be designed to support an appropriate balance of informal social activity;
- Provide play opportunities for various age groups; and
- Meet the changing and diverse needs of different occupiers.

London Plan Policy D5 Inclusive design

Development proposal should achieve the highest standards of accessible and inclusive design. They should:

1) Be designed taking into account London's diverse population
2) Provide high quality people focused spaces that are designed to facilitate social interaction and inclusion
3) Be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment
4) Be able to be entered, used and exited safely, easily and with dignity for all; and
5) Be designed to incorporate safe and dignified emergency evacuation for all building users.

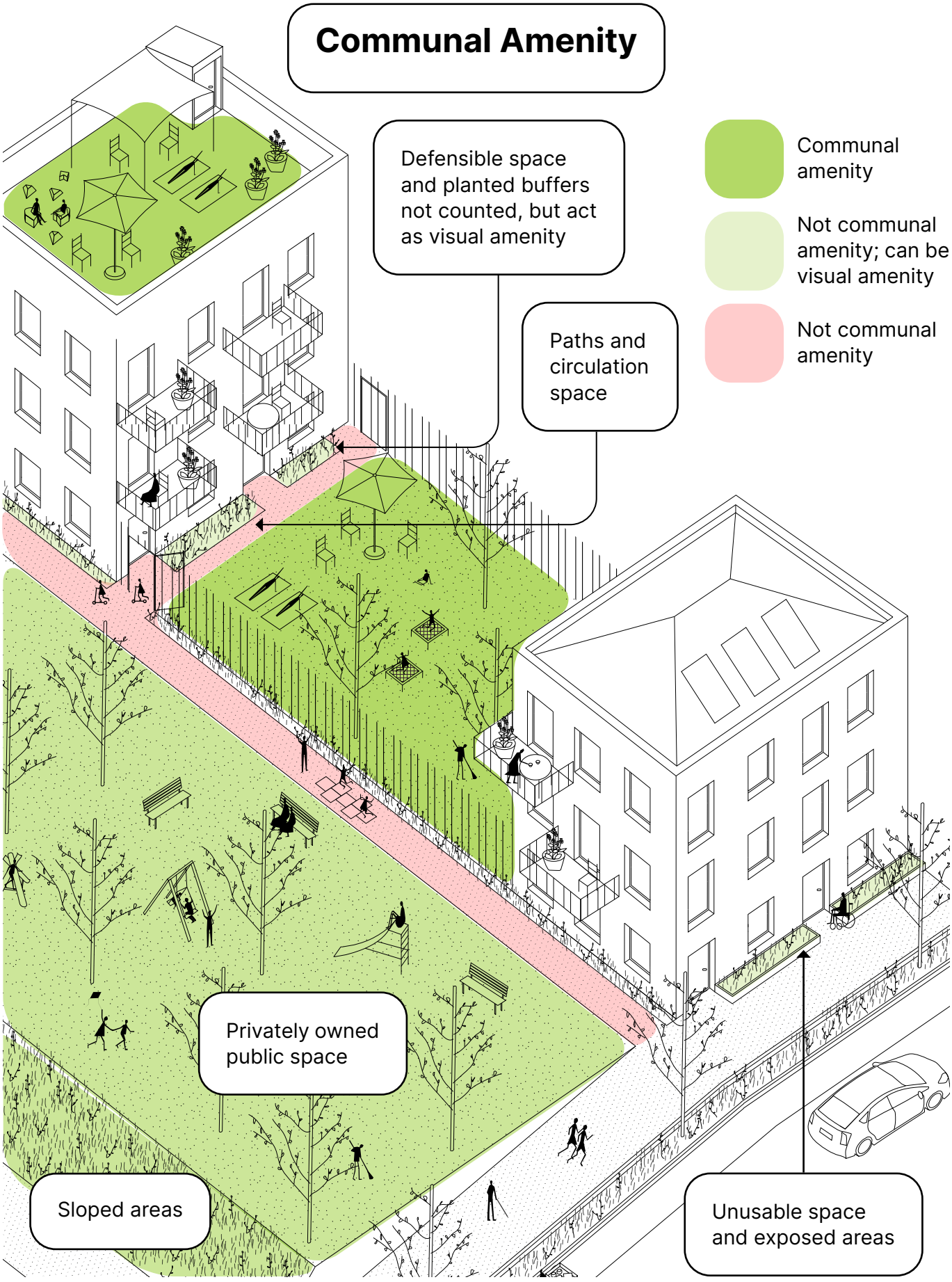


Figure 5: Examples of what is and is not communal amenity space

Figure 6: Examples of privately owned public space and communal amenity space

Privately owned public space:

Visual appeal, sensory and active design, and play

Views to communal space from a balcony; balconies have a slatted balustrade to provide screening and privacy

Private and Communal Amenity

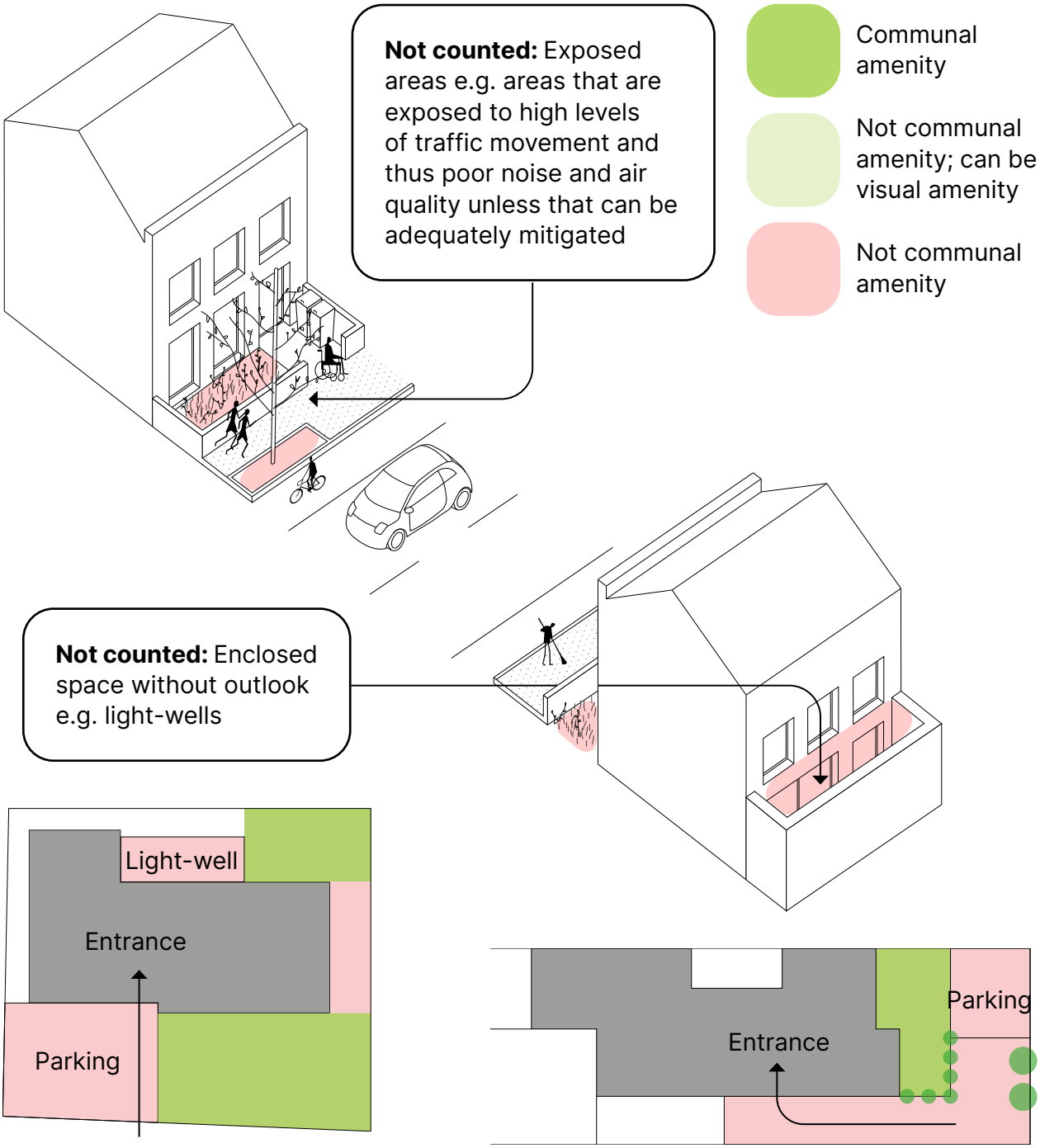


Figure 7: What counts as private and communal amenity space?

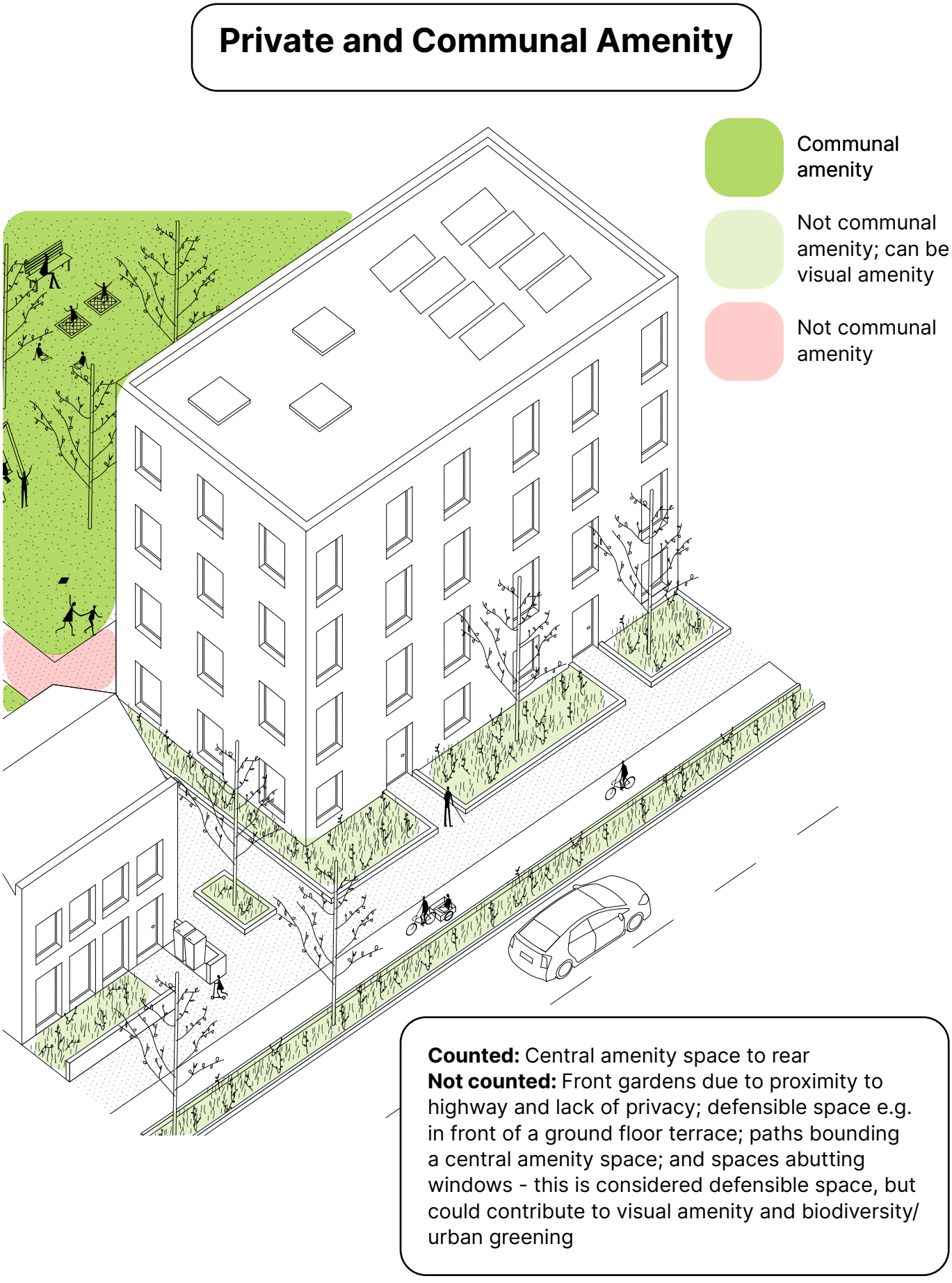


Figure 8: What counts as private and communal amenity space?

3.4 Environmental Requirements

3.4.1 Environmental factors, such as light, noise and air quality affect the usability of private and communal amenity spaces. They should help define the appropriate size, shape and position of these spaces.[33]

Daylight and Sunlight

3.4.2 There is a strong body of research supporting the benefits of natural light for healthy living. Light has been shown to have direct effects on mood, cognition, alertness, performance, and sleep.[34] Brent Local Plan Policy BH13 states that amenity space should be designed to take maximum advantage of daylight and sunlight. It is expected to be sufficient to allow comfortable use and enjoyment of private and communal amenity spaces. Where the design of development has the potential to restrict light to amenity spaces e.g. if the amenity space is constrained or enclosed by high walls, a daylight and sunlight assessment may be required to demonstrate the quality will be sufficiently high.

Minor Development (under 10 dwellings)

3.4.3 Private and communal amenity spaces should be optimised for daylight and sunlight.

Major and Strategic Development (10 or above dwellings)

3.4.4 Brent supports the use of 'Site Layout planning for daylight and sunlight: a guide to good practice' produced by the BRE (BRE209). These guidelines recommend that at least half of a garden or open space can receive at least two hours of direct sunlight on March 21st. This is a minimum expectation and developments that exceed this target are encouraged.

3.4.5 The design of external communal amenity space should be planned so that seating areas or play spaces are located in the areas most likely to receive sunlight.

Noise

3.4.6 Exposure to noise pollution can have detrimental effects on health and the enjoyment of amenity spaces. Research has shown that noise levels below the hearing damaging criterion can still cause annoyance, sleep disturbance, cognitive impairment, stress reactions and cardiovascular disorders.[35] The acoustic environment of amenity spaces should be considered so that they can be used and enjoyed as intended.

3.4.7 Design principles to mitigate noise[36] can include:

- Reducing the impact of adjoining activities or the local environment's noise e.g. the orientation and/or location of amenity space;
- Incorporating noise barriers and screening;
- Optimising the sound insulation provided by the building envelope or green infrastructure; and
- Glazed, ventilated winter-gardens or recessed balconies.

3.4.8 The adverse impact of noise on any private external amenity space may be partially offset if residents are provided with access to a relatively quiet[37] alternative or additional external amenity space. This can either be for sole use by a dwelling or group of dwellings. Acceptable alternatives include a garden, roof garden or large open balcony in a different, protected, location.

3.4.9 A planning condition may be required for external amenity spaces to be designed in accordance with BS 8233:2014 'Guidance on sound insulation and noise reduction for buildings'. This will seek to attain a maximum noise level of 55dB LAeq (1hr) between 07:00 and 23:00.

3.4.10 However, the BS 8233:2014 guideline values may not be achievable in all circumstances. In these cases, outdoor noise levels should not necessarily be a reason to not provide external amenity space, but it should be designed to achieve the lowest practicable noise levels.

3.4.11 Where a development is likely to be exposed to high levels of noise, applicants are encouraged to engage with the council at pre-application stage.

Air Quality

3.4.12 London Plan 2021 Policy SI 1 (B) requires that development proposals use design solutions to prevent or minimise increased exposure to existing air pollution. This should address local problems of air quality at the outset in preference to post-design or retrofitted mitigation measures. All major developments are required to carry out an Air Quality Assessment.

3.4.13 Green infrastructure can be used to protect residents from ambient pollution.[38] Careful consideration of orientation and location of amenity spaces can also minimise exposure to air pollution.

3.4.14 Children are especially vulnerable to the health effects of poor air quality. Play spaces, especially for younger children, should therefore be located to minimise exposure to pollution.

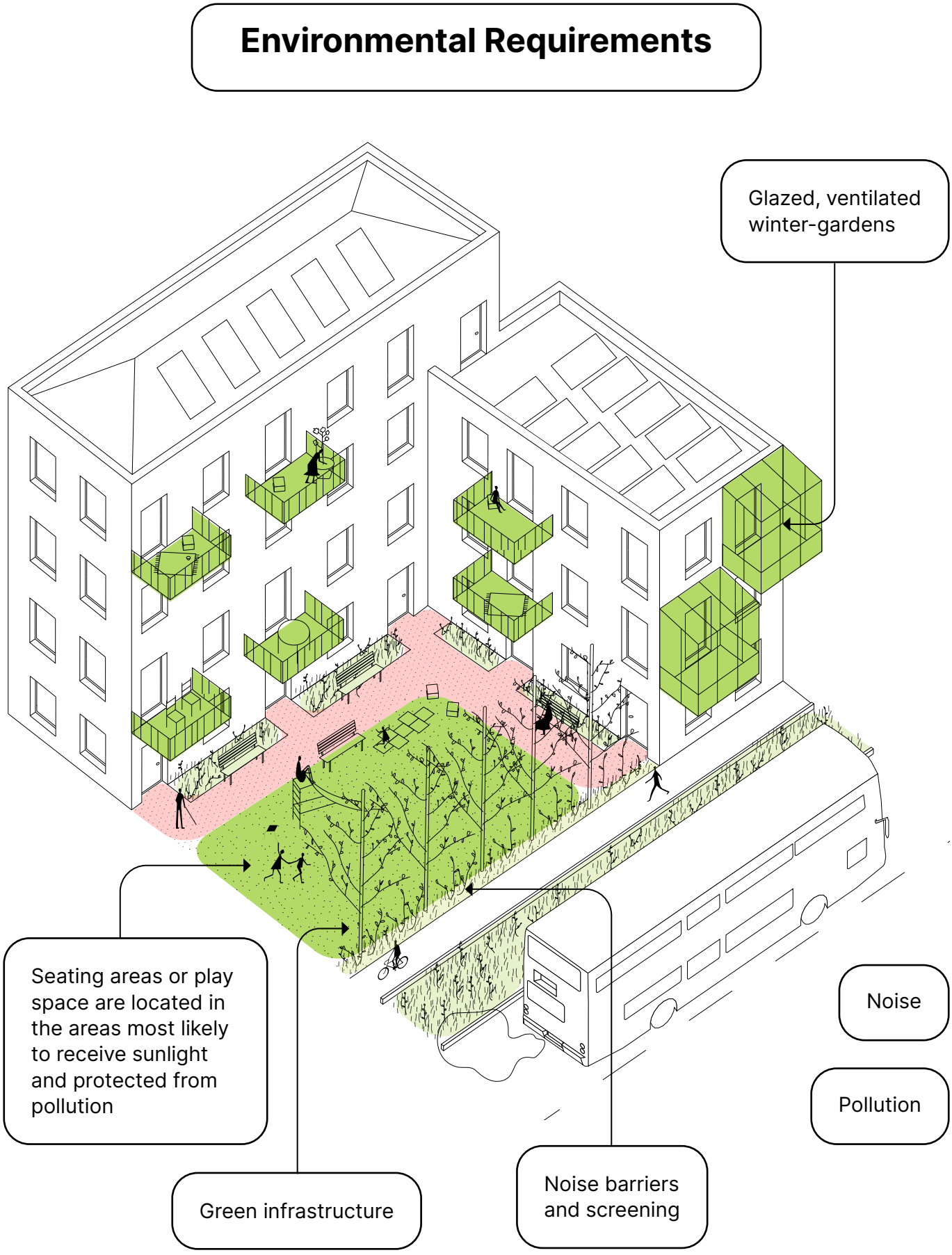


Figure 9: Examples of environmental requirements

3.5 Stewardship, Management and Maintenance

3.5.1 Quality, design and maintenance are important factors in people's perceptions of amenity spaces. Each may impact the extent to which social benefits are realised. Studies show that well-designed and well-maintained green spaces can help to reduce antisocial behaviour, while those that aren't tend to do the opposite.[51]

3.5.2 In turn, evidence indicates that the health benefits of green space are dependent on people's feelings of safety and the behaviour of other users.[52] The aim should be to maximise the potential for community and social ties within an amenity space. Contributing factors such as activities, versatility, maintenance, facilities and access need to be considered.[53]

Management and Maintenance Plan

3.5.3 The council may expect management and maintenance plans for communal amenity spaces to be set out and may apply planning conditions for landscape. This will depend on the scale, context and nature of a scheme. Management can create a positive user experience for those living in a development. The plans should confirm that the quality and value of amenity space is achieved and sustained in the long-term.

High Density Developments

3.5.4 London Plan Policy D4 Delivering good design states that higher density residential developments should demonstrate their ongoing sustainability in terms of servicing, maintenance and management. Specifically, details should be provided of day-to-day servicing and deliveries, longer-term maintenance implications and the long-term affordability of running costs and service charges (by different types of occupiers).

Social Tension and Anti-Social Behaviour

3.5.5 Points of possible social tension resulting from urban density should be identified through robust design appraisals at the design stage. This could include noise from open spaces disturbing adjacent residents. Defensible space and buffer zones should be provided to facades with residential windows. Planted screening may minimise potential conflict between different users. Screening should be in balance with daylight and sunlight considerations.

3.5.6 Spaces that appear un-maintained may lead to them feeling hostile and unsafe, impacting their enjoyment or usability. Therefore a management plan can sustain the quality and positive use of amenity spaces over time.

Community Ownership and Participation

3.5.7 Management plans that support community involvement are encouraged as this can build the positive use of spaces. It can also foster a sense of ownership and pride of place by enabling different people to meet and different generations to mix.

3.5.8 Developments are encouraged to include:

- Opportunities for community involvement;
- Mechanisms for responding to community needs; and
- Clear processes and policies for accommodating community uses and events where appropriate.

Community Gardening and Food Growing

3.5.9 Community gardening and food growing projects are encouraged. These can build on the success of projects across the borough. They can also support the future sustainability of food aid agencies in the borough in line with the Brent Poverty Commission recommendations.[39]

Community Programming

3.5.10 For larger schemes, active community programming[40] can help build momentum around a new development. It can encourage local collaboration and a sense of welcome. Bringing new and existing communities together can celebrate cultural richness, improve health and wellbeing, and reduce social isolation.

3.6 Development Types and Submissions

3.6.1 Brent covers both inner and outer London areas. It has a wide range of types and sizes of developments. These span a range of different contexts, such as suburban locations, town centres and Growth Areas, as designated in the Brent Local Plan. This guidance sets out different levels of planning application submission requirements for different development types. This is in proportion to their potential impacts and benefits for residents and the local community.

Minor Development

Relates to developments of under 10 dwellings.

Please refer to **Section 4** for guidance and submission requirements.

Major and Strategic Development

Relates to developments of 10 or above dwellings. Due to the high potential impacts and benefits on residents' quality of life, the attainment of high-quality amenity space is required. This is particularly important when the private amenity space area requirements are not met. High quality is defined by the Place Quality Toolkit.

Please refer to **Section 5** and **Section 6** for guidance and submission requirements.

Contextual and Qualitative Assessment

3.6.2 All assessments are made in the context of the site, scheme and wider area, balancing the benefits and specific factors that are relevant on a case-by-case basis.

4. Minor Development

4.1 Requirements

4.1.1 New build minor developments, conversions and change of use applications under 10 dwellings will be assessed against the following criteria and submission requirements. Conversions and change of use above 10 dwellings will usually be assessed against the requirements of **Section 5**.

4.1.2 Any landscaping of the amenity space should be defined as part of the proposal. Areas of hard and soft landscaping, and boundary and threshold treatments must be identified. Communal amenity spaces are expected to be designed by a landscape architect.

Private Space

- Must provide 50sqm for a three bedroom ground floor dwelling or 20sqm for all other dwellings of private amenity per dwelling to the requirements of **Section 2**;
- Maximise, but as a minimum provide the London Plan area equivalent of private amenity space, with remaining policy area requirement provided as high-quality communal amenity space to the requirements of **Section 2**. The shortfall must be considered for each dwelling, including when communal amenity spaces are the only spaces accessible to some.

Constrained Sites and Mitigation Factors

- Internal space provision and quality must exceed the minimum area standards and not be considered adverse living conditions; and
- Development must be within a safe 400m walk of open space, which is of a suitable size and type appropriate for the future residents' needs.

Loss of Open or Green Space:

- Expected to be mitigated by compensatory measures. E.g. the re-provision of green or open space as additional high quality amenity space, optimising the urban greening of the site to achieve minimum score of 0.4 or higher.

Planning Application Submission Requirements

- Amenity Space Quality Statement (for minor development);
- Amenity space area schedule; and
- Amenity space key plan with area boundaries and reference numbers.

Table 2: Requirements for minor developments

Amenity Space Quality Statement (Minor Development)

Please provide a statement answering the following questions, supported by an Amenity Space Area Schedule and key plan

Step 1: Is the policy area requirement achieved for private amenity?

Yes

No

Step 2: Does the area of private amenity space meet London Plan standards as a minimum? Does the communal amenity space meet the requirements of Section 2 of this SPD?

Yes

Step 3: Confirm if the total area requirement is achieved for private and communal amenity combined?

No

Step 3: Confirm the area shortfall and justification of mitigating factors

E.g. Does the internal living space exceed minimum space standards and not result in adverse living conditions? Provide details of areas and quality of space

And/Or

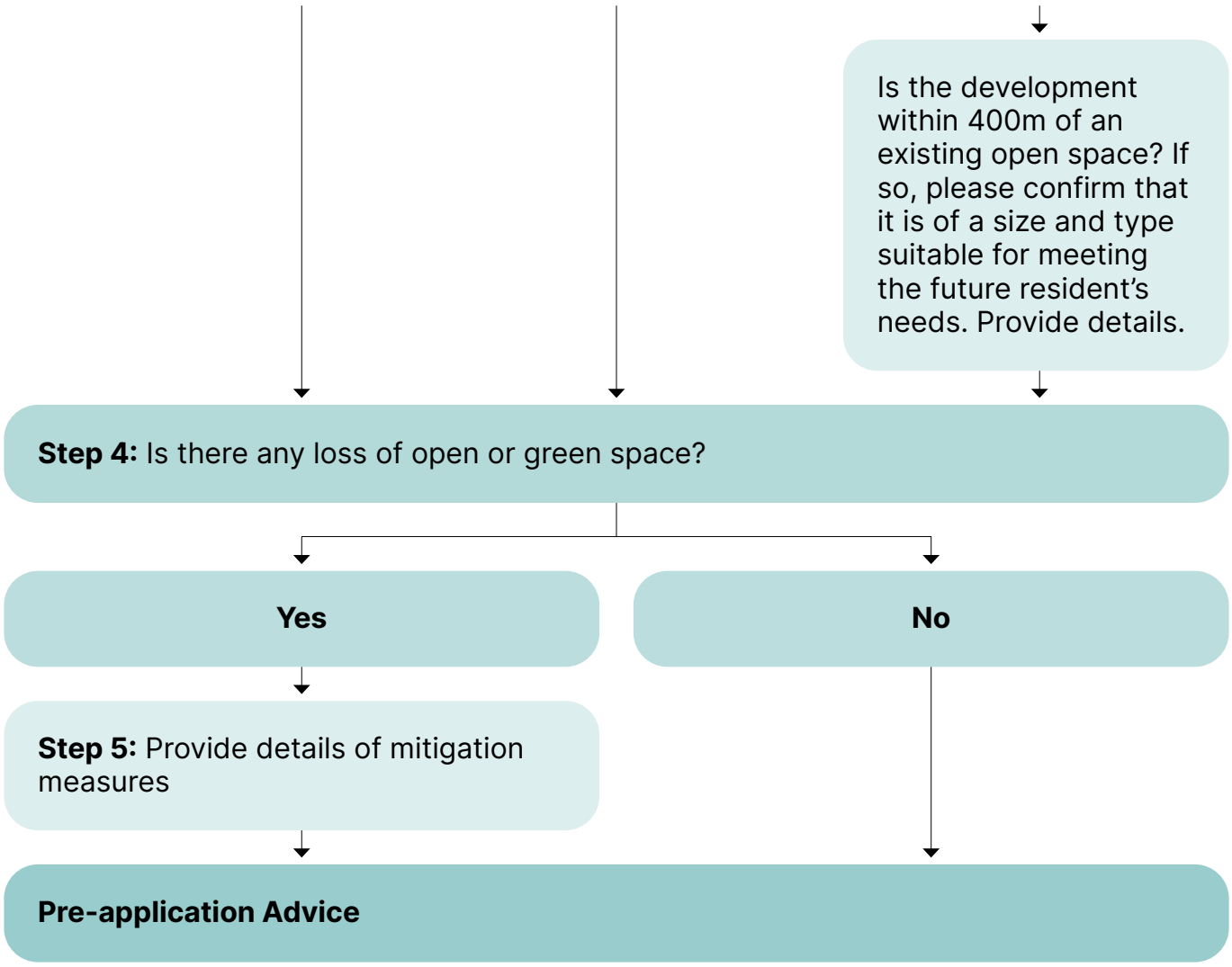


Table 3: Amenity Space Quality Statement process

4.1.3 To indicate how the Amenity Space Quality Statement process is followed for minor development, a worked example is included in **Table 4** based on the indicative floor plan shown in **Figure 10**.

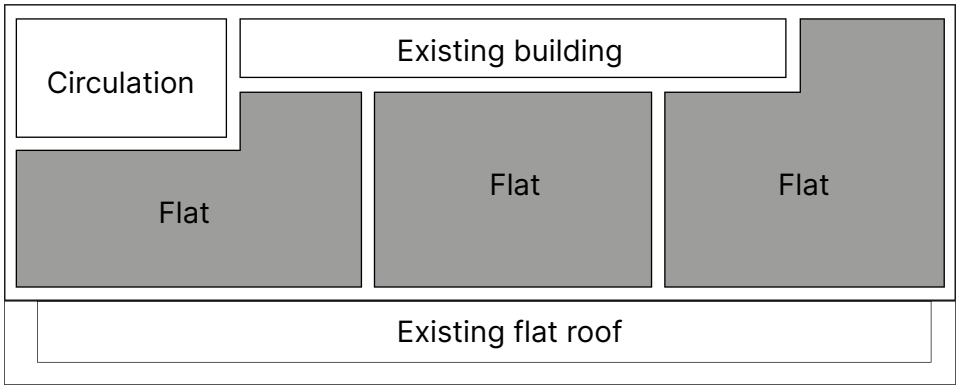


Figure 10: Indicative floor plan for conversion of an existing building

Amenity Space Quality Statement (Minor Development)

Please provide a statement answering the following questions, supported by an Amenity Space Area Schedule and key plan

Step 1: Is the policy area requirement achieved for private amenity?

Yes

No

Step 2: Does the area of private amenity space meet London Plan standards as a minimum? Does the communal amenity space meet the requirements of Section 2 of this SPD?

Yes

Step 3: Confirm if the total area requirement is achieved for private and communal amenity combined?

No, London Plan minimum of 5sqm not met; no communal amenity provided

Step 3: Confirm the area shortfall and justification of mitigating factors

No mitigating factors set out; only minimum internal living space areas provided

And/Or

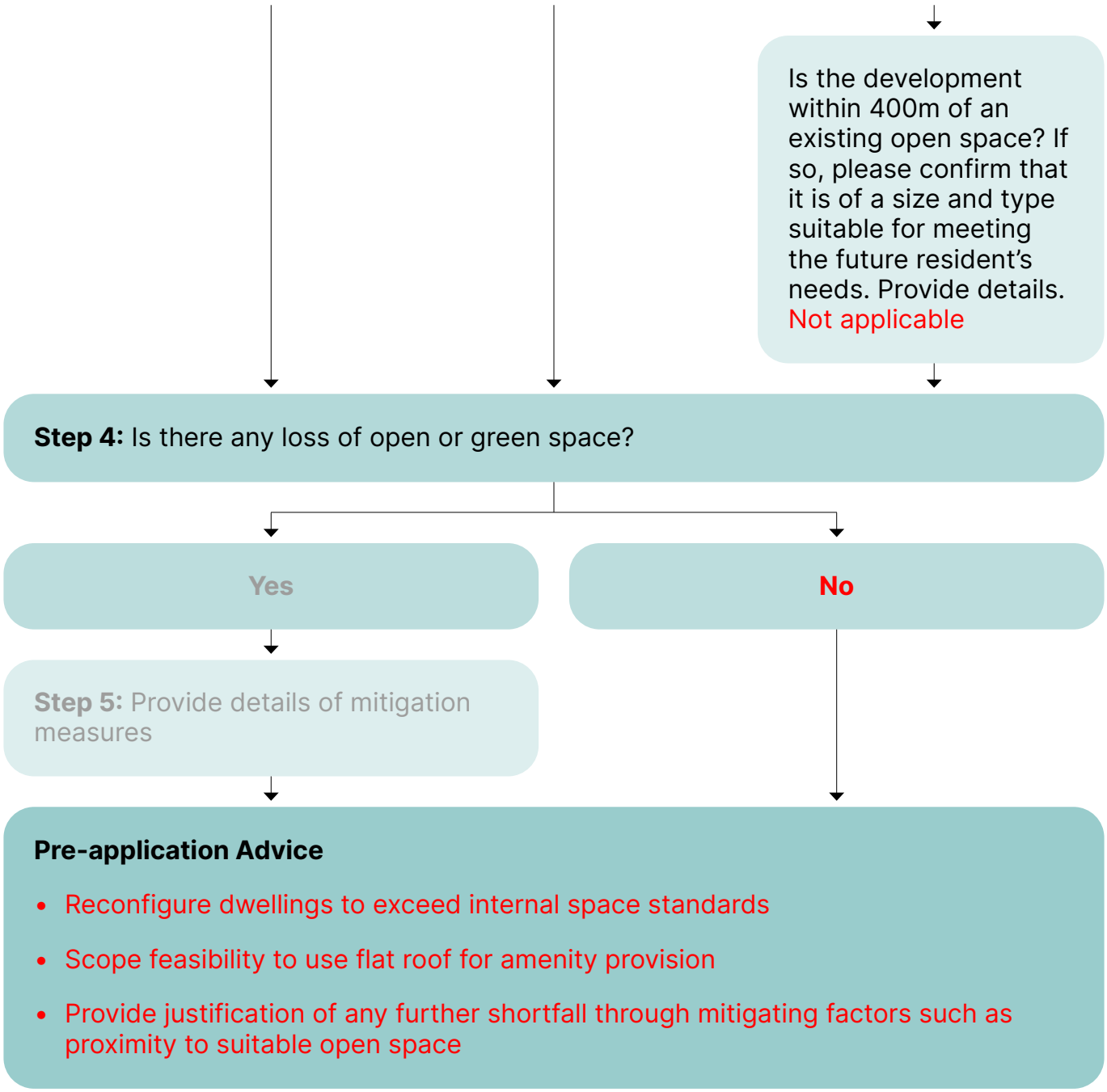


Table 4: Amenity Space Quality Statement worked example

Case Study (Minor Development)

Rokesby Place, Brent (22/1400)

- Infill scheme of two new homes
- High quality amenity space provided
- Requirement to balance the loss of green space

High quality communal amenity:

- Shared garden
- Buffer and planting zone for privacy
- Pedestrian-friendly design
- Boundary wall has increased planting

Pre-application advice:

- Loss of landscaping
- Maximise opportunities to re-provide soft landscaping
- Reduce hard standings and mitigate rear patio gardens by providing usable front gardens
- Optimise urban greening of the site

Figure 11: Examples from Rokesby Place DAS and Landscape Design Report

5. Major Development & Place Quality Framework

5.1 Overview

5.1.1 This section provides further guidance on the expectations for major and strategic development, including conversions or change of use applications of at least 10 dwellings It sets out the definition for high quality communal amenity space when there is a shortfall of private amenity space against the requirements of Brent Local Plan Policy BH13.

5.1.2 Due to the high potential impacts and benefits to residents' quality of life, the assessment of amenity space for these schemes is defined by the Place Quality Framework and Toolkit. This section also provides further guidance on the qualitative expectations for Policy BD1 Leading the way in good urban design.

Private Space

- Must provide 50sqm for a three bedroom ground floor dwelling or 20sqm for all other dwellings of private amenity per dwelling to the requirements of **Section 2**;
- Where it is not possible, maximise, but as a minimum provide the London Plan area equivalent of private amenity space, with the remaining policy area requirement provided as high-quality communal amenity space to the requirements of **Section 2**, **Section 5** and **Section 6** as relevant;
- Any shortfalls will be considered for each dwelling and the accessibility of communal spaces.

High Quality Communal Amenity:

- Provide an Amenity Space Quality Statement, which demonstrates how it is designed for quality of life outcomes using the Place Quality Toolkit;
- Provide a supporting evidence base of drawings.

Mitigation Factors

- See **Section 5.7**

Planning Application Submission Requirements

- See **Section 5.4**

Key Concepts

The National Planning Policy Framework (NPPF) requires planning policies and decisions to ensure that developments:

"Create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users" [54]

The Building Better, Building Beautiful Commission recommends that:

"New developments should enhance the environment in which they occur, adding to the health, sustainability and biodiversity of their context"

A **healthy city** is one that continually creates and improves its physical and social environments. It expands the community resources that enable people to mutually support each other in performing all the functions of life and developing to their maximum potential.

World Health Organisation

The Commission's overarching recommendation is that **'health creation',** also known as interventions positively improving health and wellbeing, should be the determining factor for built environment, planning and placemaking policies.

What Creates Healthy Cities? Commission on Creating Healthy Cities 2022

The **social determinants of health** are the non-medical factors that influence health outcomes. They are the conditions in which people are born, grow, work, live and age, and the wider set of forces and systems shaping the conditions of daily life.

World Health Organisation

5.2 Place Quality Framework

Figure 12: Place Quality Framework and Toolkit

Framework

Structure of qualitative impacts, criteria and outcomes for people's experience of the built and natural environment

Toolkit

Process and method for shaping places to the qualitative outcomes, through a range of different design considerations

Indicators

Specific design measures which demonstrate how the qualitative outcomes are achieved in a place

What is the Framework and Toolkit?

5.2.1 The Place Quality Framework and Toolkit set out the council's expectations for high quality design. They have been shaped in response to Brent's Good Growth vision, Corporate Strategy (the Borough Plan) and Local Plan Policy BD1. They can be used to assess the quality of external and internal communal amenity spaces, and public spaces where a scheme is reliant on this to mitigate amenity space policy shortfalls under Brent Local Plan Policy BH13.

5.2.2 The overall framework has three dimensions of impact and nine qualitative criteria or outcomes based on human experience considerations.[41] These criteria act as "building blocks" for people-focused places and the Place Quality Toolkit (see **Table 5 and Section 5.5**). The toolkit includes a set of example design considerations focused on quality of life. They are prompts and questions to establish expectations, shared values and common benchmarks for quality. Applicants are required to demonstrate how qualitative outcomes are achieved by identifying specific design measures, or Place Quality Indicators; examples of these indicators are included.

5.2.3 The overall framework has been shaped to address Brent's local priorities and principles of empowerment, social sustainability and equity. The qualitative criteria bring together recommendations from national guidance into a new tool for implementation. Some aspects go beyond existing guidance, by drawing on leading practice.

5.2.4 Users are encouraged to refer to other guidance documents such as:

- Healthy Streets indicators - TfL
- Building For a Healthy Life - Homes England
- Quality of Life Framework - Quality of Life Foundation
- *Design codes and health. Companion guide to the National Model Design Code on health improvement and disparities – OHID (due to be published early 2023)*

5.2.5 The Place Quality Framework helps those involved in designing and assessing development proposals to consider the qualitative aspects of places. This is both in relation to their direct and indirect impacts on people's lives. This tool is purposefully open-ended rather than a prescriptive checklist of features or a scoring system. This is because a combination of "good" features does not necessarily make a well-designed place if not carefully and cohesively considered.[42] Good design requires more time, analysis and thought.[43]

5.2.6 This framework provides a common reference point for good design. It goes beyond physical form and visual aesthetics to prioritise people-focused outcomes and measures of success. Healthy and inclusive shared places can support equity in many ways and ensure the benefits of growth are balanced across communities.

5.2.7 The Place Quality Toolkit should help structure pre-application discussions and design reviews to ensure wide-ranging considerations are covered in the round. The toolkit should also be used to frame discussions with communities about their places, needs, aspirations when developing proposals.

5.2.8 The toolkit is:

- A basis for qualitative assessment addressing specific criteria;
- Expected to be used by applicants to demonstrate design quality through quality of life considerations; and
- Not meant to be diminished in its role to simply a checklist or scoring system.

5.2.9 Four practical tools have been developed (see **Section 5.5**):

Place Quality Tool A: First Principles

Place Quality Tool B: Health and Wellbeing

Place Quality Tool C: Community and Belonging

Place Quality Tool D: Vibrant and Inclusive Places

Where to Use the Toolkit?

5.2.10 People-focused design considerations are expected to be integrated into the design process from the start. In case of shortfalls in the provision of private amenity space, Brent Local Plan Policy BH13 prioritises the provision of external communal amenity space. However, the provision and quality of internal communal amneity space can also be a mitigating factor. Where public space is proposed as a mitigating factor, the toolkit should also be used to demonstrate quality. The hierarchy of value and mitigating factors is set out in **Table 8**.

Masterplans

The appropriate size, shape and position for an external amenity space should be considered as part of the first principles of design in terms of how it meets residents' needs

External Amenity Spaces

The design of external amenity spaces should be considered through the perspective of quality of life outcomes, both direct and indirect

Public Spaces

Spaces that are also open to the community foster positive social interactions and increase residents' sense of trust and belonging

Internal Amenity Spaces

The entrance space, common areas and circulation of a building affects people's experience of their home. It can help people feel proud of where they live, and encourage social interaction. Shared areas outside and within buildings should be designed as places that residents feel are intended for use by them

Health and Wellbeing

5.2.11 This dimension considers how places can support physical and mental wellbeing directly. This can include spaces that are restorative by reducing stress and improving mood. Examples can be green spaces,[44] tranquil spaces or spaces designed with biophilic design principles.[45] There is a significant body of evidence linking contact and exposure to the natural environment with improved health and wellbeing.[46] The benefits of green space are particularly important in Brent's areas of open space deficiency, deprivation and health inequalities.

5.2.12 Visual amenity and the attractiveness of places impacts wellbeing and the positive experience of a place. People's sense of ownership and influence over their environment also impacts health and wellbeing. For example, a greater sense of control over our lives and local environment is associated with healthier behaviours, greater psychological wellbeing and increased social connectedness.[47]

Community and Belonging

5.2.13 Amenity space provides a setting for social interaction, which studies have shown can reduce isolation and loneliness.[48] Shared spaces can be used to build familiarity and a sense of commonality among residents. Green spaces can support bringing communities together. For a sense of community to take root in a neighbourhood, it is important to consider how a sense of identity and belonging is developed.

5.2.14 This dimension considers the importance of places that encourage casual encounters between the people that spend time there. Good design enables social interaction, builds social capital or sustained ties between people, and supports resilience. This is important particularly for high-rise, high density and Build to Rent developments in Brent (see **Section 6**). This dimension also focuses on how community and a sense of place can be supported by "wonder",[49] and a strong character and identity, and how these factors support developing pride of place.

Vibrant and Inclusive Places

5.2.15 Amenity spaces can act as places for social integration by catering to a broad demographic spectrum. These spaces can facilitate both formal and informal interactions. These can be between people from different ages and cultural backgrounds, and this can in turn lead to increased social cohesion and inclusion. This is important in Brent, where there are high levels of diversity across the population. This dimension considers the needs of specific users, including children, young people, women and older people. It includes how places can be accessible and welcoming, feel safe, support vibrancy and connect new and existing communities together.

5.2.16 Social integration is the extent to which people positively interact and connect with others who are different to themselves. It is determined by the level of equality between people, the nature of their relationships, and their degree of participation in the communities in which they live. Amenity space, as shared space, can enable people to have more opportunities to connect with each other positively and meaningfully, support people to play an active part in their communities, and reduce barriers and inequalities.[50]

What is the Process?

5.2.17 The framework sets out the components and steps to consider in preparing the required planning application submission material; an Amenity Space Quality Statement (see **Section 5.4**).

Place Quality Tool A

Context and User-Focused First Principles

Socio-economic and cultural context: An informed understanding of the levels of needs of different communities and specific groups must be reflected in the design, quality and provision of amenity space. Development will be expected to respond to local challenges of inequalities and the potential opportunities in Brent. (Section 2)

User-focused first principles: The tool should be used to describe how the overall strategy for amenity space is high quality with respect to supporting people's quality of life.

Place Quality Tools B, C & D

Quality of Life Dimensions and Criteria

Health and Wellbeing

Community and Belonging

Vibrant and Inclusive Places

Quality of life dimensions and criteria: These tools should be used to describe the specific qualitative benefits of the space and assist with defining Place Quality Indicators for individual spaces.

Levels of good practice and aspiration: The toolkit defines levels of baseline, good and leading practice. Innovation and careful attention to these factors is welcomed.

Green Infrastructure and Sustainability Co-Benefits (see **Section 2.3**)

Design that brings together several positive outcomes is encouraged (see also **Section 5.3**).

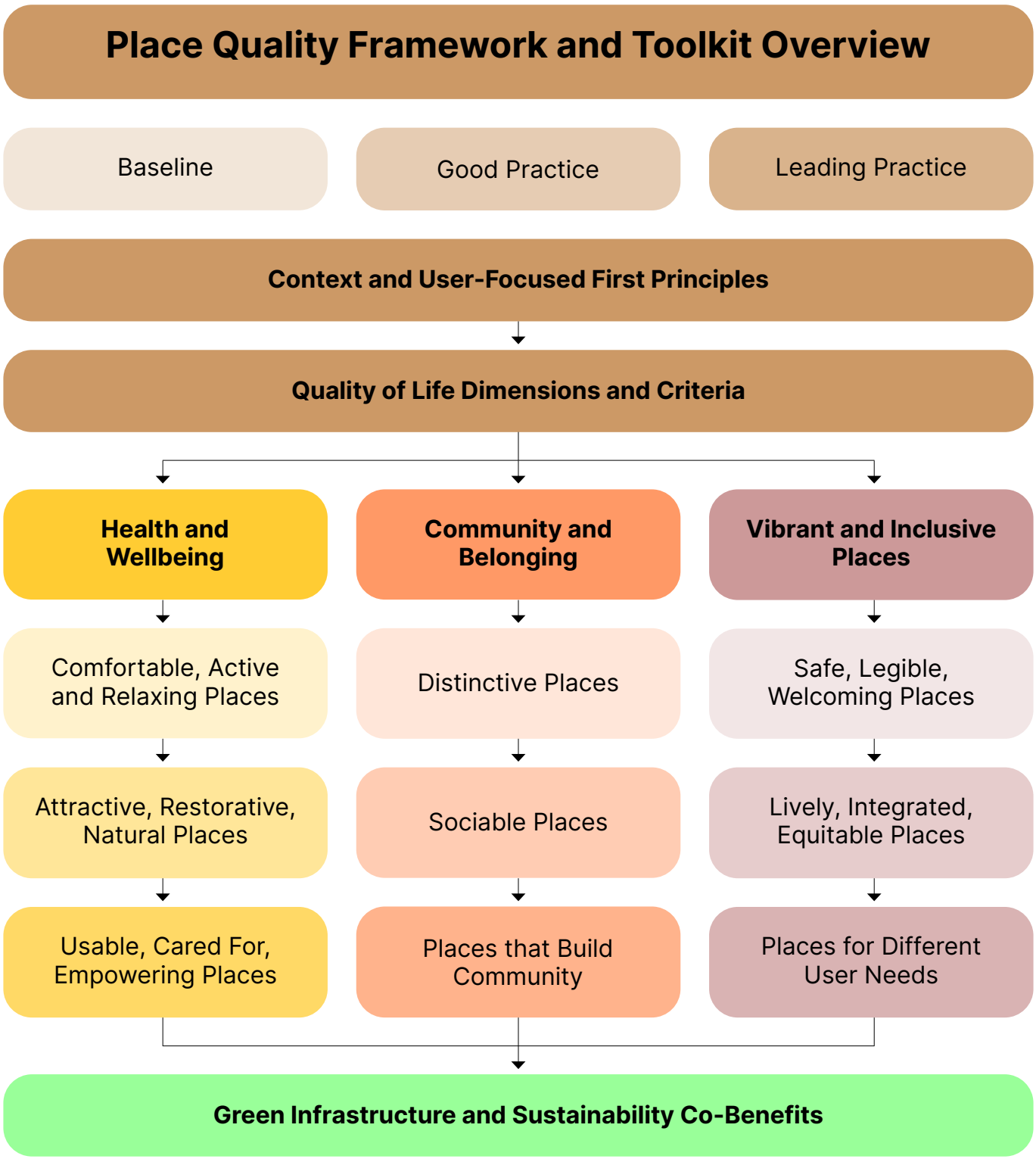


Table 5: Place Quality Framework and Toolkit building blocks

5.3 Place Quality Priorities

5.3.1 The following aspects are particularly encouraged due to the multiple co-benefits they bring across different challenges and outcomes.

Green Space and Green Infrastructure

5.3.2 Green spaces and green infrastructure play a key role for both residents' quality of life and sustainability. There are significant co-benefits (see Section 3.2 of the emerging Sustainable Environment and Development SPD).

Community Gardening and Food Growing

5.3.3 Public Health England guidance identifies that allotment gardening may result in numerous positive physical and mental health-related impacts and outcomes.[51] Community gardens provide similar benefits. They allow new opportunities for people to meet their neighbours, building a sense of community around the garden, and improving social capital or value.[52] In the context of food poverty, they can provide access to fresh food and encourage healthy eating (see Chapter 3 of the emerging Sustainable Environment and Development SPD for further details).

Social Interaction

5.3.4 In high-rise, high density and Build to Rent development, social interaction is more typically difficult to achieve organically.[53] In this context, the qualities of internal communal spaces can be particularly important in supporting neighbourliness and building community (see **Section 6**).

Children and Young People

5.3.5 The places where children and young people spend their time are vitally important for their development and wellbeing. Shared spaces can support them in feeling a sense of ownership, belonging, safety, pride and possibility for the future. Good design can be welcoming to allow them to equally enjoy communal spaces and support their wellbeing.

Vibrant and Inclusive Places

5.3.6 This high-level dimension addresses the needs of different types of people and how they can be brought together in places holistically. It includes considering new and existing communities, disadvantaged groups and more vulnerable residents.

5.4 Planning Application Submission Material

5.4.1 The Place Quality Toolkit should be used to prepare an Amenity Space Quality Statement that covers design considerations from the overall strategy to the details of the spaces. It should be accompanied by:

- A key plan clearly identifying each space and the area considered amenity space;
- An amenity space area schedule; and
- An accompanying evidence base of drawings.

5.4.2 The drawings submitted should be based on the material that would usually form part of a Design & Access Statement or landscape design statement. The scale and nature of the scheme will ultimately dictate the amount of material submitted. It would usually be expected to include masterplan concept diagrams, views of spaces, plan diagrams and other types of drawings normally used to explain the design quality of a scheme.

5.4.3 Submissions should be proportionate to the scale of the scheme. Larger schemes are expected to provide more information and details. For example, a Large Major development (50 to 149 homes) will require more information than a Small Major development (10 to 24 homes).

5.4.4 Submission drawings are to be marked or annotated with Place Quality Indicators; specific design measures in relation to the Quality of Life criteria. The example design considerations in the toolkit are provided as prompts only and are not a prescriptive checklist or guidelines of minimum expectations. Not all example design considerations may be relevant to the design, type of space and the development scale or context. Applicants are to consider how to best demonstrate high quality amenity space and to define Place Quality Indicators that are relevant to their context and aspirations.

Leading Practice and Brent-Specific Place Priorities

5.4.5 Design approaches, considerations or indicators considered to be leading practice or addressing a Brent-specific place priority are encouraged and should be noted in the Amenity Space Quality Statement.

5.4.6 Applicants are to provide:

Amenity Space Quality Statement (Major Development)

Masterplan statement

Describe how the overall strategy for amenity space is high quality with respect to supporting people's quality of life. Provide a written statement that demonstrates the qualitative benefits using Tool 1 as a guide

Individual statements for each amenity space

Describe how the qualitative benefits of the space, using Tools 2-4 to assist with defining Place Quality Indicators. Please mark the accompanying submission drawings as evidence

Amenity space key plan with area boundaries and reference numbers

Supporting evidence: drawings with Place Quality Indicators marked or annotated

Amenity space area schedule

Table 6: Amenity Space Quality Statement checklist

Example Supporting Evidence

Masterplan statement

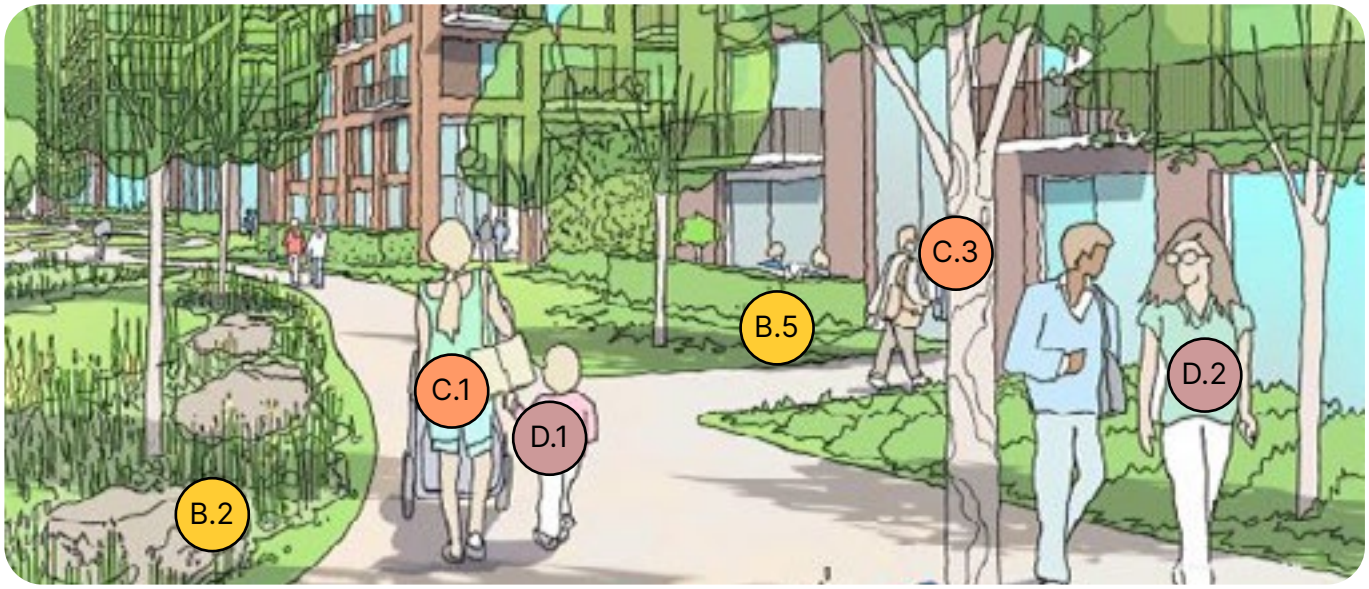
Describe how the overall strategy for amenity space is high quality with respect to supporting people's quality of life. Provide a written statement that demonstrates the qualitative benefits using Tool A as a guide.

Tool A: Context and User-Focused First Principles

Figure 13: Examples of supporting evidence

Individual statements for each amenity space

Describe the qualitative benefits of the space using Tools B-D to assist with defining Place Quality Indicators. Please mark the accompanying submission drawings as evidence.



Place Quality Indicator descriptions or references to statement marked on drawings

Tool B: Health and Wellbeing

Tool C: Community and Belonging

Tool D: Vibrant and Inclusive Places

5.5 Place Quality Toolkit

Tool A: First Principles

1) Design for Specific User Needs

What is the socio-economic or cultural context of the site?

Who are the users, what are their needs?

How do the amenity spaces meet the needs of prospective residents and the full range of different type of users?

Do the amenity spaces meet the needs of the most vulnerable users? See **Tool D: Vibrant and Inclusive Places**

Is this a place for different user needs?

2) Variety, Flexibility, Character and User Journey

How is amenity space distributed across the development with respect to variety and flexibility of use, and the creation of distinctive spaces with character?

Please explain the user journey through the scheme.

3) Human Scale and Sense of Spaciousness

How does the approach to scale, size and layout promote feelings of privacy and control perceptions of density?

Does it provide a sense of spaciousness or openness?

4) Nature

How does the design of communal amenity space (external and internal as relevant) maximise access to natural and green environments?

Can residents experience nature at various scales throughout the development?

Tool A: First Principles

5) Social Integration and Connectivity

How do the amenity spaces enable residents, including those of different tenures, to connect and interact with each other and build a sense of community?

Are the amenity spaces available to all occupants?

How is neighbourhood connectivity and permeability maximised?

6) Strategic Development (150+ Dwellings)

How are smaller communities within the development being defined?

E.g. Smaller communities surrounding usable amenity spaces and several pockets of amenity space rather than one very large provision.

7) Area Shortfalls and Mitigation Factors

If the policy area requirement has not been met for private amenity space, or private and communal amenity space combined, please provide details of mitigating factors (see **Section 5.7**).

This can include:

- High quality Privately-Owned Public Space;
- High quality internal communal amenity space; and/or
- Proximity to open space - if the development is within a safe 400m walk of open space which is of a suitable size and type appropriate for meeting the future residents' needs; please provide justification.

Tool B: Health and Wellbeing

Baseline | Good Practice | Leading Practice

Is this a comfortable, active and/or relaxing place?

- How have the requirements for light, noise and air quality been addressed in the design? (See **Section 2**)
- Will the space feel appropriately peaceful or lively given the kind of shared space it is and the time of day it will be used?
- Are active design principles incorporated such as features that encourage walking?
- For internal space, is there a sense of spaciousness or visual connections between spaces? E.g. internal windows or double height space, or 'borrowed' views to outside?

Is this an attractive, restorative, natural place?

- Is there a landscape-led approach evidenced by a landscape design statement?
- How are the benefits of green and tranquil spaces being maximised?
- What are the qualities of the green spaces? Are there a wide range of natural features? E.g. planting, trees, water features, wild planting etc.
- Are there any sensory considerations?
- Are there sheltered areas for different types of weather?
- How is the amenity space and surrounding setting aesthetically and visually appealing? E.g. not bounded by blank elevations.
- Is it an interesting and engaging space to experience and spend time in?
- For internal space, have the connections to external and natural spaces been maximised?

Tool B: Health and Wellbeing

Baseline | Good Practice | Leading Practice

Is this a usable, cared for and empowering place?

- How is the space accessed by residents and how convenient is it to use in everyday life and day-to-day routines?
- Are they able input into its use? How much control and influence do they have?
- Can residents be involved in the design or maintenance of the space?
- Are residents and communities involved in co-design, co-production or engagement beyond typical consultation?
- How will the space be cared for and maintained? E.g. management, social tensions, community involvement, community gardening (see **Section 3.5**)
- Will there be any community programming to activate the space?

Leading Practice

- Are residents and communities involved in co-design, co-production or engagement beyond typical consultation?

Place Quality Indicators

Comfortable, relaxing
Quiet and peaceful courtyard for enjoyment by residents.

Unity Place, Brent

Comfortable, active, sociable
Double-height lobby creates sense of spaciousness. Visible wide staircase with regular landings encourages walking. Internal windows create spaciousness and supports social interaction between residents.

Varcoe Road, Southwark

Attractive, restorative, natural
Visual amenity, interest and appeal provided with sensory, attractive, playable landscaping.

Grand Union, Brent

Usable, cared for
Cared for and well-maintained green spaces.

Canada Gardens, Brent

Tool C: Community & Belonging

Baseline | Good Practice | Leading Practice

Is this a distinctive place?

- Does the design of the space support a sense of place for residents or visitors?
- Is it characterful, memorable or related to the local context?
- Does it celebrate local assets, characteristics or the identity of the residents?
- Does the design support pride of place and a common sense of identity?

Is this a sociable place?

- Does the design encourage people to spend time in the space?
- Are there any features that encourage dwelling? E.g. a reason to stay and pause?
- Are there any aspects that create interaction and sociability between users? E.g. shared resources or the arrangements of homes. Has social interaction been prioritised, such as communal gathering or places to sit with neighbours?

Is this a place that builds community?

- Are there factors that support building long term relationships between residents? E.g. places for shared activities? Is there a central space that acts at the “heart” of the development?
- Is a sense of belonging supported in the design?
- Are there any elements of playfulness or cultural activity?
- Are the opportunities for community gardening, including food-growing, composting and spaces that enable people to interact and work together?

Leading Practice

- Does the design go beyond sociability to create social value and social capital?

Place Quality Indicators

Distinctive, sociable

Places to sit and pause.

Unity Place, Brent

Seating orientated to activity and views.

Granary Square, Camden

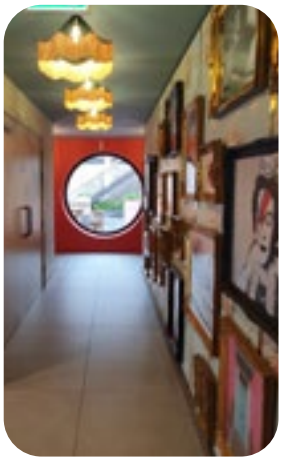
Sociable

Places to sit and talk to neighbours.

Marmalade Lane, Cambridge

Corridors with places to pause and features to look at e.g. art

Canada Gardens, Brent



Builds community

Social interaction is prioritised with shared common spaces for regular gathering and mixing generations.

La Borda Cooperative Housing, Barcelona

Builds community

Community gardening; including food-growing, composting and spaces that enable people to interact and work together

Harlesden Town Garden, Brent

Tool D: Vibrant and Inclusive Places

Baseline | Good Practice | Leading Practice

Is this a safe, legible and welcoming place?

- How is the space designed to feel safe, beyond the use of lighting or defensive measures?
- Are the spaces overlooked with clear distinction between public, semi-private and private spaces?
- Are there clear “fronts” and “backs”? How is this defined?
- Are there transition spaces between private and public space, to enable social connection?
- Is it easy for people to find their way in and around the shared space?
- How is the space designed to feel welcoming to those using it or visiting?

Is this a lively, integrated and equitable place?

- How do the ground level frontages and uses activate and enliven the space?
- Do the shared spaces connect to the wider neighbourhood and community?
- Is permeability and integration maximised?
- Does the design consider social inclusion, integration and cohesion between different groups?
- Is there opportunity for people from different walks of life to meet?
- Is it welcoming regardless of a resident’s tenure, with equitable access to the space and associated entrances and facilities?
- Is the space accessible and inclusive to different types of people and with dignity for all?
- Intergenerational: Does the space cater for people of different ages or backgrounds coming together? E.g. communal BBQ facilities
- How does the space allow different types of people to come together and interact without there being tension between different activities?

Tool D: Vibrant and Inclusive Places

Baseline | Good Practice | Leading Practice

Is this a place for different types of user needs?

- How does the design consider the needs of specific groups? Who are the groups and what are their needs?
- Has there been any consultation with specific users and demographic groups? E.g. children and young people in the design of new provision to understand their changing needs?
- Child-friendly: How are their needs integrated into the design?
- Young people: How are their needs integrated into the design?
- Are there places for young people to “hang out”, such as covered external space which can be used in all weathers
- Women and teenage girls: How is the space designed to ensure women and girls feel comfortable to use the space as well as safe at different times of day?
- Older people: How is the design age-friendly? Are there places to stop and rest?
- Protected characteristics: How does the design consider people with protected characteristics, such as disability or race?

Leading Practice

- Does the design go beyond creating “places for everyone”, to give specific consideration to a wide range of specific and identified user needs?
- Neurodiversity: How is the design responsive to a range sensory and neurological needs ? Is it informed by guidance or standards such as PAS 6463:2022 Design for the mind. Neurodiversity and the built environment? E.g. has the design been informed by sensory needs of users of the space so that it is for instance suitable for people with Alzheimer’s or Autism?
- Does the design help overcome barriers for marginalised groups?

Place Quality Indicators

Safe, legible, welcoming

Courtyard is overlooked for natural surveillance giving a sense of safety and conviviality.

Unity Place, Brent

Lively, integrated, equitable

The different areas of the park are zoned to allow a range of users to enjoy the space simultaneously and parents to keep an eye on their children from a range of vantage points.

Woodhouse Urban Park, Brent

Places for different user needs

A public space designed by young people for young people, for them to come together and relax, where they can 'just be' and a place to 'hang out' without needing to spend any money.

The design includes sheltered seating areas and a covered space for events.

Samovar Space, Brent.

Park developed in collaboration with the community and local partners; and to ensure that public space and future upkeep were designed, delivered and managed sustainably

Woodhouse Urban Park, Brent

5.6 Place Quality Assessment

5.6.1 Assessments may take into account mitigating factors and contextual considerations (see **Section 5.7**).

Score	Rationale
Excellent	The submission demonstrates an exceptionally well-crafted qualitative design response. The approach to design quality and quality of life outcomes is excellent, demonstrating an innovative and progressive design concept. There are several examples of leading practice included and Brent place priorities addressed, demonstrating that the design goes beyond current best practice. The proposal demonstrates a high level of ambition which would significantly add to the Good Growth in Brent aspirations for the built environment of the borough.
Good	The submission demonstrates a good and well-crafted qualitative design response. The approach to design quality and quality of life outcomes, relevant policy and best practice context is clear, demonstrating that the design is equal to current best practice. The proposal relates to the Good Growth in Brent aspirations for the built environment of the borough.
Unsatisfactory	The submission demonstrates a design response that has limited elements that address the requirement for high quality design and quality of life. The approach to design quality outcomes, relevant policy and best practice context is partially explored, demonstrating a design concept that is not considered high quality.
Poor	The submission demonstrates an incomplete design response. The approach to design quality and quality of life outcomes, relevant policy and best practice context is tenuous, and the design concept is unclear.
Unacceptable	An appropriate understanding of the policy requirements has not been met in any form. The proposal is not clear and would detract from the aspirations for the built environment of Brent.

Table 7: Amenity Space Quality Assessment criteria

5.7 Mitigating Factors, Adverse Impacts and Addressing Inequalities

5.7.1 There may be instances where the policy requirements cannot be fully met. In these cases, a hierarchy of value and mitigating factors provides further guidance (see **Table 8**).

5.7.2 If proximity to open space is considered a mitigating factor and justified, planning contributions toward improvements to those public open spaces may be required

5.7.3 Further contextual considerations and potential adverse impacts may be taken into account in assessments such as:

- **Loss of Open or Green Space**
  - Mitigation measures may be expected such as optimising urban greening.

- **Growth and High-Density Areas**
  - Shortfalls of amenity space in schemes results in increased population density without the necessary increased provision of amenity to meet their needs. This may cause adverse impacts on health, wellbeing and quality of life. This may also result in existing open spaces coming under increasing demand and pressure. This might negatively impact on communities outside of the development.

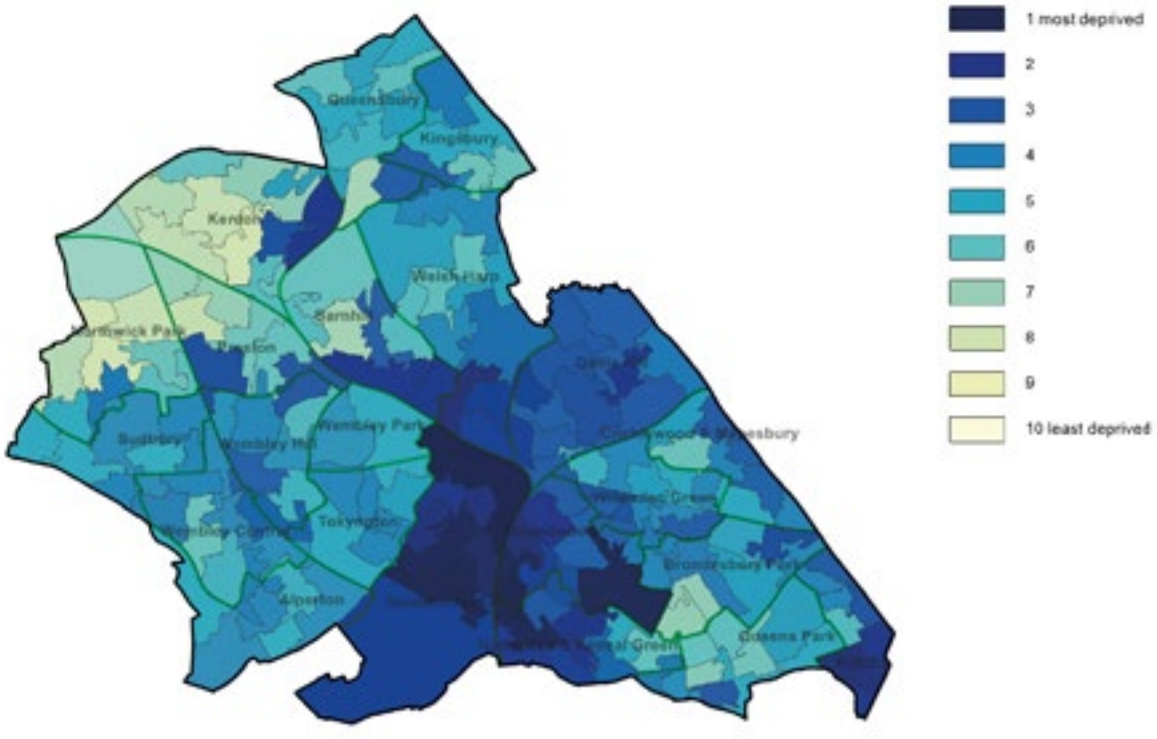
- **Areas of Open Space Deficiency and Deprivation**
  - Delivery of residential amenity space will usually be given highest priority in locations which have an open space deficit, as identified in **Map 1**;
  - Areas of deprivation and health inequalities can intersect with areas that lack of access to green space, as identified in **Map 2**. The highest priority is usually expected to be given in these circumstances.

Contextual Assessment

5.7.4 Each development is assessed on a case-by-case basis in the context of the site, scheme and local area. Population sizes, densities and quality of existing open space varies across the borough. Some of the factors that may be taken into consideration include:

- Number of new homes and density of proposed development;
- Population of new development;
- Existing type of homes (houses with gardens or flats) in area and limited access to private amenity;
- Existing population densities;
- Projected population densities;
- Quality and usability of existing open spaces in surrounding area, in meeting local population's needs; and
- Accessibility of existing open spaces in surrounding area.

Map 1: Open space deficiency in Brent



Map 2: Indices of Multiple Deprivation in Brent 2019

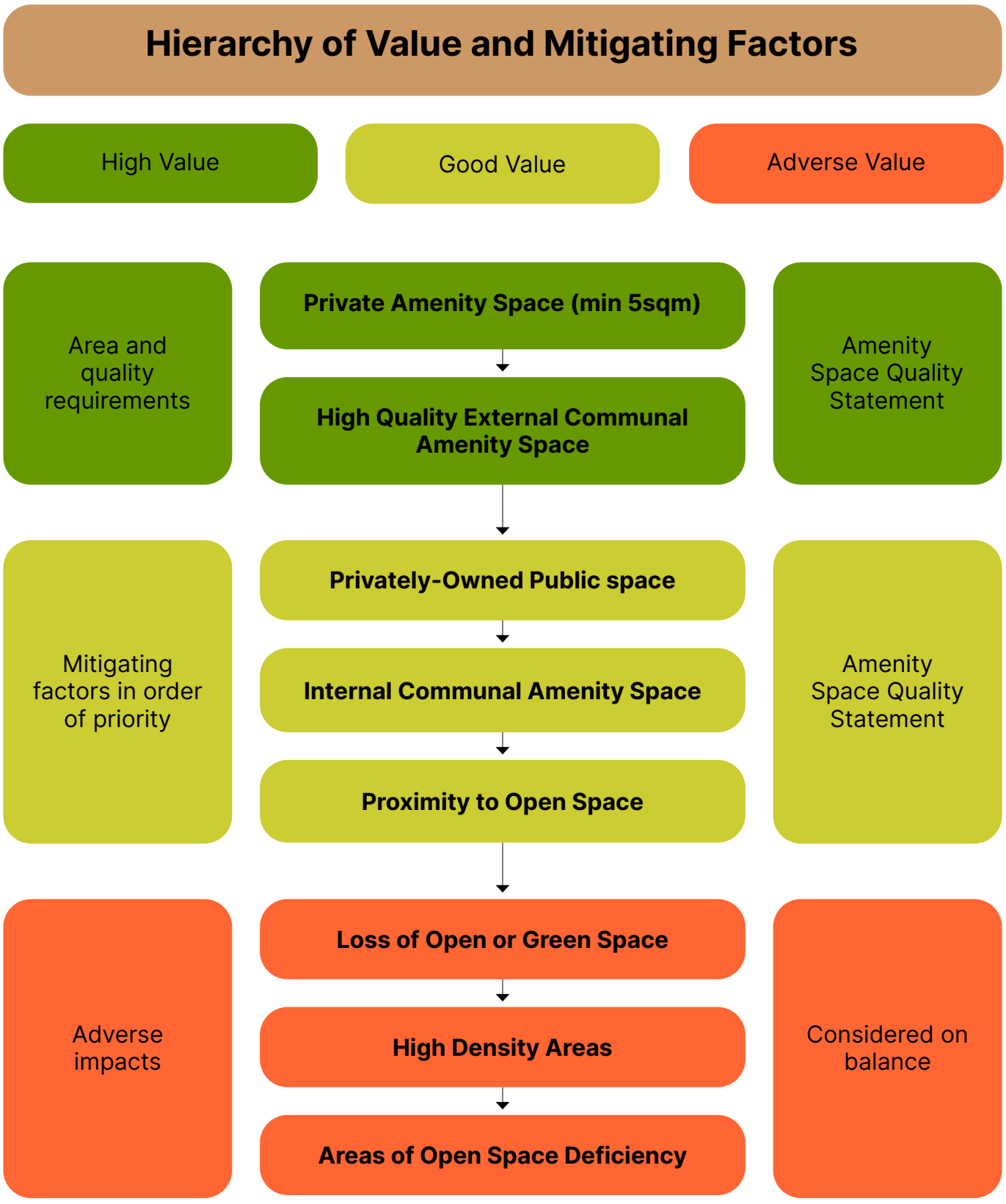


Table 8: Hierarchy of value and mitigating factors

6. Specific Typologies

6.1 High-Rise, High Density, Build to Rent

London Plan Policy D4 Delivering good design

Para 3.4.8 For residential development it is particularly important to scrutinise the qualitative aspects of the development design described in London Plan Policy D6 Housing quality and standards. The higher the density of a development the greater this scrutiny should be of the proposed built form, massing, site layout, external spaces, internal design and ongoing management. This is important because these elements of the development come under more pressure as the density increases. The housing minimum space standards set out in Policy D6 Housing quality and standards help ensure that as densities increase, quality of internal residential units is maintained.

High Density

6.1.1 High density and compact developments have many benefits. They can create liveable, vibrant places that also support sustainability objectives due to connectivity.

6.1.2 The Brent Local Plan has identified the challenges of creating high quality, mixed use higher density environments that fit well into the surrounding suburban context.[55] High density living environments can make it challenging for residents, particularly those of different tenures, to connect and interact with each other. However, they can present a good opportunity to improve social integration and a sense of community. This is more likely if a mix of tenures and home sizes is achieved and communal spaces are designed and managed correctly.[56]

High-Rise Buildings

6.1.3 High-rise buildings can be associated with higher turnover rates, neglect of common spaces, low social trust and architectural design that supports anonymity.[57] Spatial constraints can often result in the provision of communal amenity space either on rooftops or in the public realm. It is therefore important to consider these design guidelines. This will make sure the quality of the scheme and communal amenity areas supports the quality of life and needs of residents. Emergency evacuation plans for communal amenity spaces above ground level should also be considered at an early stage.

6.1.4 Ground floor amenity or public space and the location of entrance spaces help make high-rise buildings feel part of the wider neighbourhood. In higher density locations, internal communal amenity space can often be the primary way of providing communal facilities in standalone tall buildings. It is therefore important for this type of development to carefully consider the design guidelines in these cases.

Build to Rent

6.1.5 There has been a 65% increase in number of households in privately rented homes in the last decade. Now over 30% of households privately rent.[58] Larger institutions are now becoming significant investors in private rent. The majority of the Wembley Park regeneration will be delivered through this model. Residents of Build to Rent accommodation should benefit from communal amenity space that supports social interaction and neighbourliness. This is likely to be beneficial to landlords, resulting in a less transient population.

6.1.6 Additional relevant policies include:

Local Plan Policy & Guidance

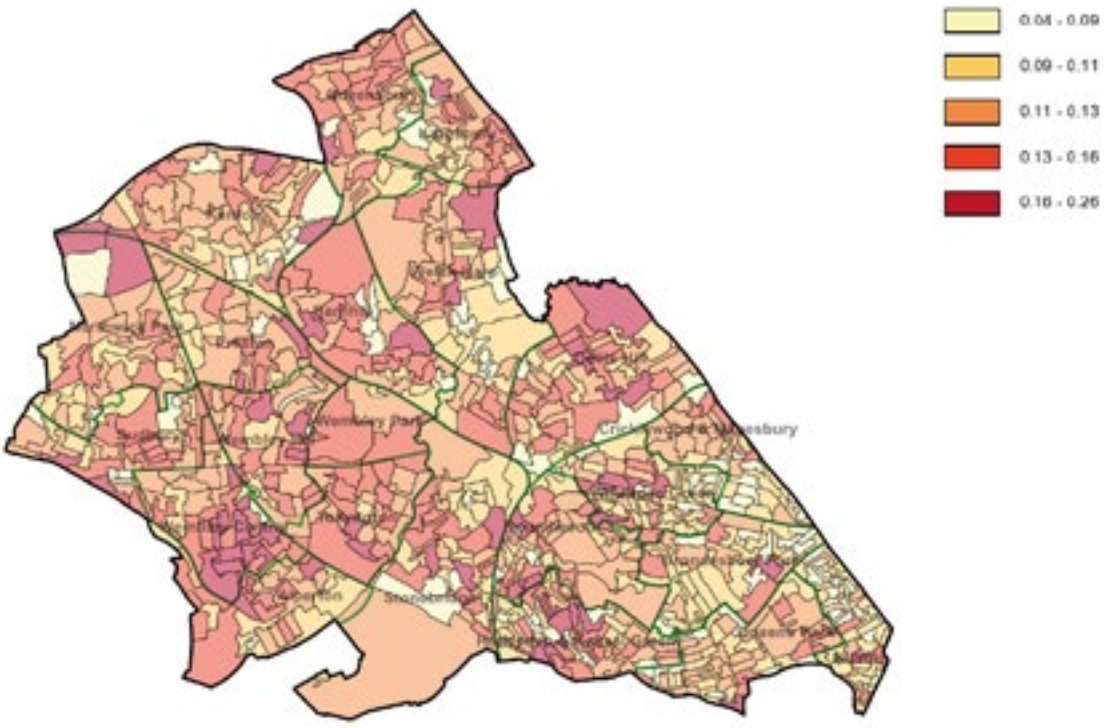
Policy BH7 Accommodation with shared facilities or additional support

London Plan Policy & Guidance

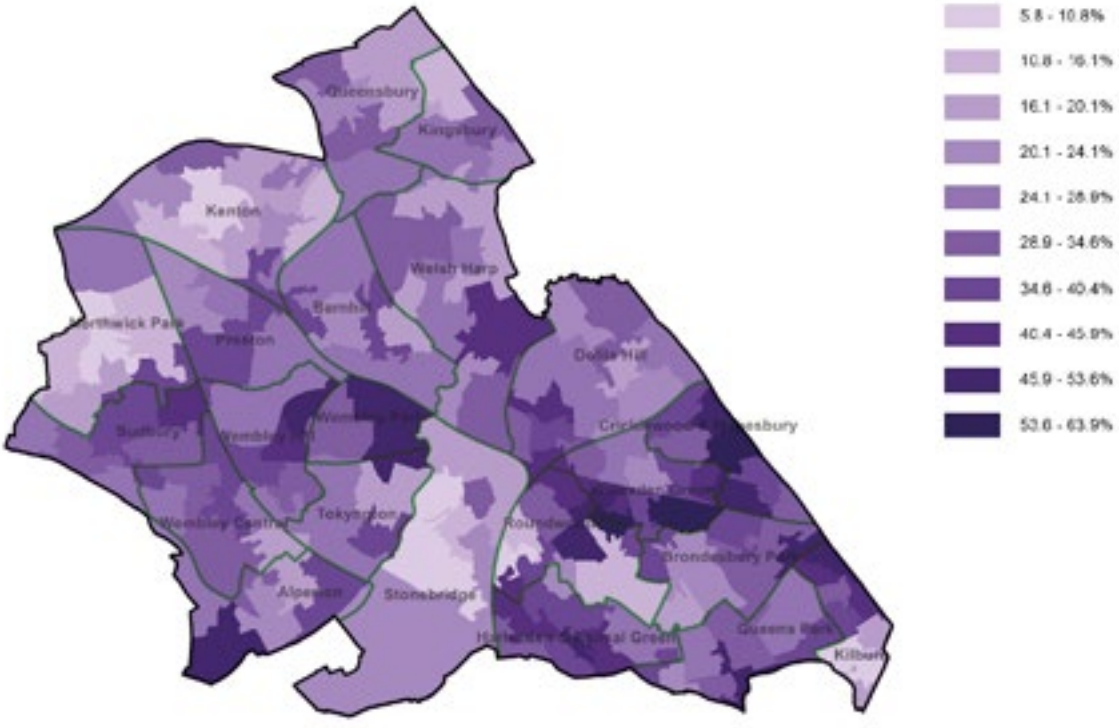
Policy H16 Large-scale purpose-built shared living

Policy H11 Build to Rent

Large-scale Purpose-built Shared Living LPG – draft 2022



Map 3: Population density as a percentage of the total borough (based on 2011 census)



Map 4: Private Rental Sector (PRS) as a percentage of all households in Brent

6.2 Co-Living and Houses in Multiple Occupation

Co-Living

6.2.1 The London Plan has existing policy and emerging guidance on co-living. This provides detailed expectations for this new typology (Large-scale Purpose-built Shared Living (LSPBSL) LPG – draft 2022)

6.2.2 It identifies an important range of considerations:

"In particular, LSPBSL should contribute towards building strong and inclusive communities and creating a healthy city, in accordance with Policies GG1 and GG3. Development will contribute towards this objective through providing high-quality homes for tenants, with communal amenity space for social interaction that can support good mental and physical health. LSPBSL, where of good quality and of high standards, could contribute towards Policy GG4 by delivering more homes to meet London's diverse range of housing needs, helping to create mixed and inclusive communities."

Houses in Multiple Occupation (HMOs)

6.2.3 It is estimated that approximately 17,000 of Brent's homes are Houses in Multiple Occupation. The Brent Houses in Multiple Occupation SPD aims to improve the quality of outcomes for HMO occupants and their neighbours in locations where HMOs are considered appropriate.

6.3 Levels of Expectations

6.3.1 This SPD sets out guidance for the levels of expectations across a wide range of scheme sizes, types and context. Generally, the expectations for quality will be in line with the potential impacts and benefits of the development. The greater the scale and population, or the higher the density, the greater the expectation of the qualitative aspects of design.

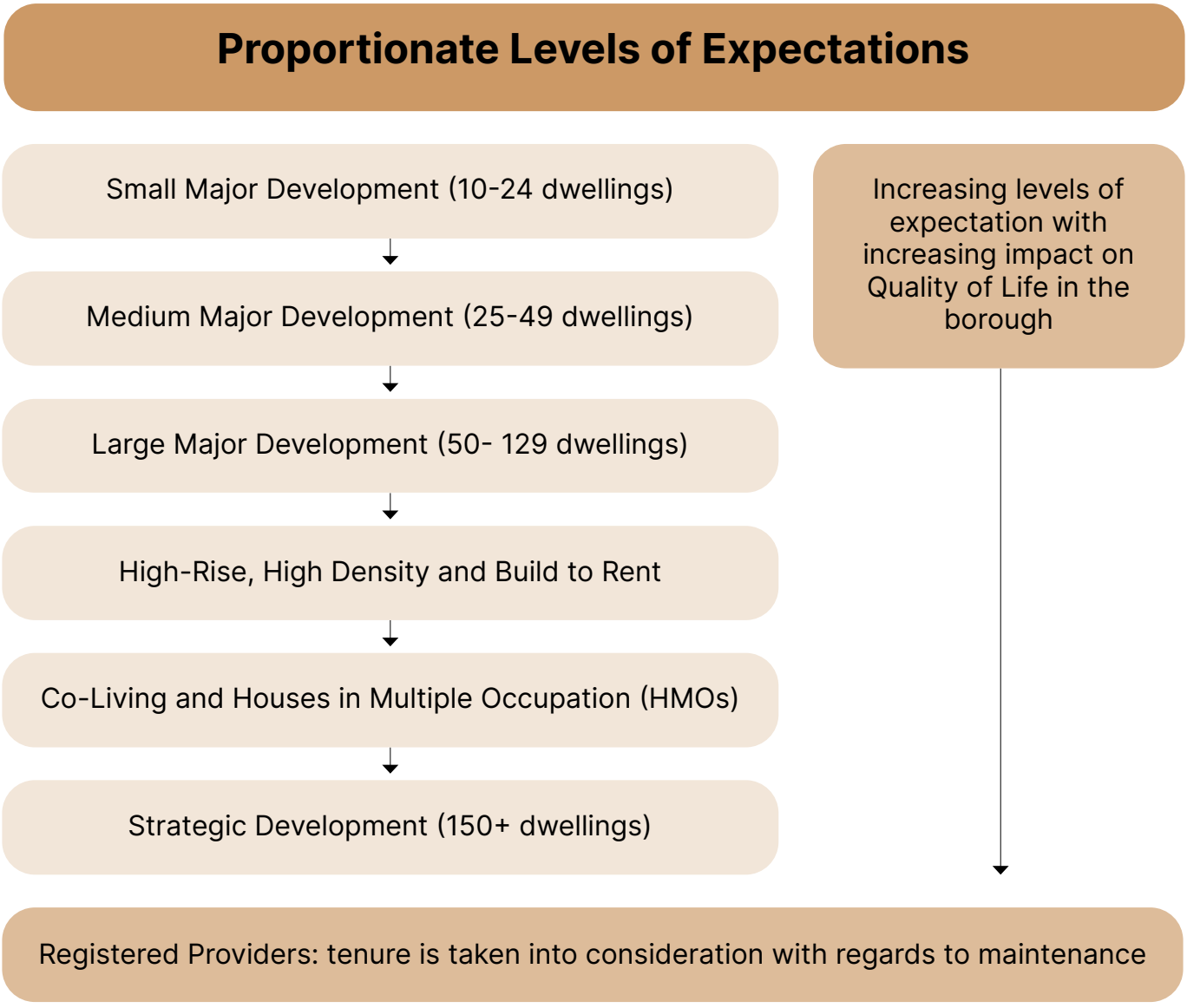


Table 9: Proportionate levels of expectations for different types of development

7. Appendix

7.1 Key Policies

London Plan Policy & Guidance

Policy D4 Delivering good design

Policy D5 Inclusive design

Policy D6 Housing quality and standards

Policy S4 Play and Informal Recreation

Policy G1 Green Infrastructure

Policy G4 Open Space

Policy G5 Urban Greening

Policy G6 Biodiversity and Access to Nature

Housing SPG 2016

Housing Design Standard LPG 2022 draft

Play and Informal Recreation SPG

Brent Local Plan Policy & Guidance

Policy BH13 Residential amenity space

Policy BD1: Leading the way in good urban design

Policy BGI1: Blue and green infrastructure in Brent

Open Space, sports and recreation study

Local Plan Section 4: Development vision and good growth in Brent

Brent Design Guide SPD1

Policy BD1: Leading The Way In Good Urban Design

All new development must be of the highest architectural and urban design quality.

Innovative contemporary design will be supported where it respects and complements historic character but is also fit for the future. In delivering high quality design, development proposals will be expected to show how they positively address all the relevant criteria within London Plan design policies and the Brent Design Guide SPD1

The council is committed to delivering excellence in development quality. It expects all new development to embrace the principles of good design, and positively respond to the character of Brent's places.

6.1.12 The policy seeks to create buildings and places of high quality that will be appreciated by future generations. High quality design is both visually interesting and attractive and should enhance local character. Good design is not just about what things look like, it is also about how places function and how individual buildings and the spaces around them contribute to the public realm and community wellbeing.

The design of the places and buildings that make up our local environment affects everyone and the quality of life. Good design makes places that put people first, promote health and are welcoming, feel safe, are enjoyable and easy to use for everyone.

7.2 Further Reading

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Barton, H. and Grant, M. (2006) A health map for the local human habitat. The Journal for the Royal Society for the Promotion of Health, 126 (6). pp. 252-253. ISSN 1466-4240 developed from the model by Dahlgren and Whitehead, 1991

Campaign to End Loneliness. Tackling Loneliness through the Built Environment. 2022

Greater London Authority. Social Integration Measurement Toolkit, 2021.

Homes England. Building for a Healthy Life, 2020

Happy City. Designed to Engage. Policy recommendations for promoting sociability in multi-family housing design, 2017

Marmot M, Allen J, Boyce T, Goldblatt P and Morrison J. Health equity in England: The Marmot Review 10 years on. London: Institute of Health Equity, 2020

NHS England. Putting Health into Place, 2019

OHID. Health disparities and health inequalities: applying All Our Health, 2022

PHE. Spatial Planning for Health: An evidence resource for planning and designing healthier places, 2017

PHE. Getting research into practice - A resource for local authorities on planning healthier places, 2021

Public Health Scotland. Place Standard Tool.

Quality of Life Foundation. Quality of Life Framework

Transport for London. Healthy Streets Approach, 2017

Endnotes

1 Brent Local Plan. para. 3.11 and 3.15

2 See Social Determinants of Health and Marmot reviews. 2020

3 Public Health England. Spatial Planning for Health: An Evidence Resource for Planning and Designing Healthier Places. June 2017.

4 See Further Reading

5 London Plan Policy D4 Delivering good design

6 Brent Local Plan. para. 4.1 Strong & Inclusive Communities 1a

7 Reid N. Compassionate Spaces. Conscious Cities Anthology 2019: Science-Informed Architecture and Urbanism. 2019

8 Brent Poverty Comission. A Fairer Future, Ending Poverty in Brent. Recommendations from the Brent Poverty Commission. July 2020

9 Brent Local Plan. para. 3.11

10 Brent Council. Black Community Action Plan. July 2020.

11 Brent Poverty Comission. A Fairer Future, Ending Poverty in Brent. Recommendations from the Brent Poverty Commission. July 2020

12 Brent Local Plan. para 3.19 referencing Sport England Active Life Survey 16-17

13 Brent Local Plan. para. 3.2.7

14 Brent Local Plan. para. 3.15

15 Gehl J. Life Between buildings: Using Public Space. 1971

16 Office for Health Improvement and Disparities. Design code and health. Companion guide to the National Model Design Code on health improvement and disparities. 2023 (draft)

17 Martmot et al, 2020; Chang et all, 2022

18 Chang M, Green L and Petrokofsy C. Public Health Spatial Planning in Practice. Improving health and wellbeing. 2022

19 Marmot et al, 2020; Turnbull, 2021; Chang et al, 2022

20 Chang M, Green L and Petrokofsy C. Public Health Spatial Planning in Practice.

Improving health and wellbeing. 2022

21 Based on Sir Michael Marmot's concept of Universal proportionalism

22 Office for Health Improvement and Disparities. Design code and health. Companion guide to the National Model Design Code on health improvement and disparities. 2023 (draft)

23 Brent Local Plan. para. 6.7.10

24 MHCLG. National Planning Policy Framework. 2021. paragraph 98

25 Brent Local Plan. para. 6.6.13

26 Brent Sustainable Environment and Development SPD

27 Brent Poverty Comission. A Fairer Future, Ending Poverty in Brent. Recommendations from the Brent Poverty Commission. July 2020. Recommendation 37

28 Brent Design Guide SPD 1 2018 and GLA, London Plan 2021

29 GLA. London Plan 2021

30 GLA. London Plan 2021

31 MHCLG. National Design Guide. 2021. H2 Well-related to external amenity and public spaces

32 MHCLG. National Design Guide. 2021. Tenure neutral definition. p.36

33 MHCLG. National Design Guide. 2021. para. 130

34 Wirz-Justice, A., Skene, D.J. and Münch, M. The relevance of daylight for humans. Biochemical Pharmacology. 2020. p.114-304.

35 Babisch, W. Cardiovascular effects of noise. Noise and health. 2011. 13(52), p.201.

36 DLUHC, MHCLG. National Planning Practice Guidance – Noise. 2019

37 Note: The Professional Practice Guidance on Planning & Noise define "relatively quiet" as any situation where the typical average hourly daytime LA90 is more than 10 dB below the typical average hourly daytime LA90 noise levels in the immediate locality.

38 GLA. Guide to Using Green Infrastructure to Protect People from Air Pollution. 2019

39 Brent Poverty Commission report: Recommendation 37: We recommend that

the council supports the future sustainability of food aid agencies in the borough including by further developing community garden schemes and working with food banks, mutual aid groups and residents' associations

40 TFL. Sustainable Development Framework. 2021. Dimension 2 Social Cohesion

41 Office for Health Improvement and Disparities. Design code and health. Companion guide to the National Model Design Code on health improvement and disparities. 2023 (draft)

42 Reid N. Compassionate Spaces. Conscious Cities Anthology 2019: Science-Informed Architecture and Urbanism. 2019

43 Homes England. Building for a Healthy Life. 2020

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48 Happy City. Designed to Engage. Policy recommendations for promoting sociability in multi-family housing design. 2017

49 Quality of Life Foundation. Quality of Life framework. 2020

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51 Public Health England. Spatial Planning for Health: An Evidence Resource for Planning and Designing Healthier Places. Jun 2017.

52 RSA. Developing Socially Productive Places. 2014

53 Future of London. Can tall buildings ever be socially sustainable? 2022

54 MHCLG. National Planning Policy Framework. 2021. para. 130(f)

55 Brent Local Plan. para. 3.12

56 Tower Hamlets. High Density Living SPD. 2020

57 Kearns A, Whitley E, Mason P, & Bond L. "Living the High Life"? Residential, Social and Psychosocial Outcomes for High-Rise Occupants in a Deprived Context. 2012. Housing Studies, 27(1), 97–126.

58 Brent Local Plan. para. 3.14

Figure 14: The determinants of health and well-being in our neighbourhoods

Source: Barton and Grant, 2006. A health map for the local human habitat (based on Dahlgren and Whitehead, 1991)

Brent Council
Civic Centre
Engineers Way
Wembley HA9 0FJ

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Brent	**Cabinet** 6th February 2023
	Report from the Director, Regeneration, Growth and Employment

Authority to Award a Contract for Services relating to the Supply, Installation, Operation and Maintenance of Electric Vehicle Charging Points

Wards Affected:	All wards
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Part Exempt- Appendix A is exempt as it contains the following category of exempt information as specified in Paragraph 3, Schedule 12A of the Local Government Act 1972, namely: "information relating to the financial or business affairs of any particular person (including the authority holding that information)"
No. of Appendices:	Three: Appendix A: Bidders for Electric Vehicle Charging Infrastructure Solution (exempt) Appendix B: Electric Vehicle Charging Infrastructure Solution Tender Evaluation Grid Appendix C: Equality Analysis – Supply, Installation, Operation and Maintenance of Electric Vehicle Charge Points
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Annekatrin Dennemann Principal Transport Planner 020 8937 3553 Annekatrin.dennemann@brent.gov.uk

1 Purpose of the Report

1.1 This report concerns the procurement of the supply of a Vehicle Charging Infrastructure Solution – Supplier Funded - End to End Service. The Council has conducted a competitive tender for this contract for a duration of 10 years with an option to extend the contract up to a maximum of 15 years. Each contract extension is subject to an annual review. This report requests

authority to award the contract as required by Contract Standing Orders 88 and 89.

1.2 This report summarises the process undertaken in procuring this contract through further competition using the Crown Commercial Services' Dynamic Purchasing System and recommends to whom the contract should be awarded to.

2. Recommendations

That Cabinet:

2.1 Approves the award of the call off contract for the supply, installation, operation and maintenance of electric vehicle charge points for 10 years with an option to extend for a further 5 years (up to 15 years) to Zest Eco Ltd following completion of the further competition from the Crown Commercial Services' Dynamic Purchasing System and notes that, depending on charge point models used, the value of the Contract is estimated to range between circa £952,000 and £1,936,000 plus a total revenue share projection over 10 years of £200,678.53.

2.2 Approves a maximum capital budget of £1.04m for supply and installation of the electric vehicle charging points.

3. Background

3.1 Uber, the private hire organisation, has adopted a clean air plan for its operations to help reduce air pollution in London (the "Clean Air Plan"). This includes a target of making every vehicle operating in London on the Uber app fully electric by 2025.

3.2 Brent drivers registered as working for Uber, and those working for independent mini cab firms based in Brent, represent a significant number of Brent workers employed in the Private Hire Vehicle (PHV) sector. There is growing demand for additional on-street EV charging infrastructure for those who are employed in the high mileage taxi and private hire trades and who currently use, or are planning to transition to, an electric vehicle, but have no convenient place to charge it. The move to electric vehicles by car hire drivers requires the availability of more charging infrastructure to enable drivers to continue in their work. Consequently, the Council requires the provision of the supply, installation, operation and maintenance of electric vehicle charge points.

3.3 The Council entered into an Infrastructure Funding Agreement ("IFA") with Uber on 13th April 2022 setting out the terms and conditions of the funding and the requirement for the Council to appoint a Charging Point Operator to supply, install, maintain and operate the on-street charge points to achieve Uber's goals. Supporting this sector to transition to EVs through the supply of conveniently located charging facilities links directly to the Council's climate change and air quality objectives and addresses the growing demand by residents for on street EV charging facilities.

3.4 Uber has agreed in the IFA to part-fund up to 160 new on-street charge points at 80 locations across Brent, with a maximum of £6,500 available per charge point. The charge points delivered through the partnership with Uber will be available for use by its drivers as well as the wider public, thereby supporting the transition to EVs of other Brent drivers too.

3.5 Following Cabinet's approval on 7th March 2022 the Council commenced the procurement process to identify and appoint a suitably qualified charge point operator (CPO) to supply, install, operate, and maintain charge point infrastructure at provisionally identified locations (or at suitable alternative locations to be agreed) for a fixed period of 10 years with an option to extend for a further 5 years, with any supplementary funding necessary to be provided by the CPO (the "Contract").

3.6 The deadline previously agreed in the IFA for the installation of the EVs is 30 June 2023. Owing to delays in the procurement process, the Council has fallen behind on the project timetable and Uber has acknowledged the concerns regarding the installation deadline. Uber are open to revisiting this deadline, and the IFA includes such flexibility on the basis that the LA will make Uber aware of any challenge to this date as soon as reasonably practicable. The Council is in the process of negotiating a revised installation deadline for the EVs with Uber.

4. Alternative Options Considered

4.1 Officers have considered whether the supply, installation, operation and maintenance of the charge points can be provided by the council but concluded that this is best provided by a suitably qualified charge point operator.

4.2 Officers worked with Uber and their consultants in reviewing a range of procurement options and concluded that a further competition using a suitable Dynamic Purchasing System ("DPS") was the most appropriate means of procuring the Contract as it supported wider competition in a constantly growing market.

4.3 Officers have reviewed a range of frameworks and concluded that the most suitable option is the Crown Commercial Services' ("CCS") DPS. There are over 50 suppliers listed on this DPS.

5. Additional background

5.1 Officers have, with the assistance from Uber's technical consultants, developed the Statement of Requirements and Supplier Questionnaire as well as other legal and procurement documents ensuring they are closely aligned with the requirements of the IFA as well as similar existing contracts for the installation, operation and maintenance of charge point infrastructure in Brent before going out to tender.

5.2 The new charge points will be located across the borough, in many cases they will be located within Controlled Parking Zones (CPZs) and the majority of the new charge points will likely be placed in parking bays that are currently

subject to Traffic Management Orders (TMOs) allowing only permit holders from the local CPZ to park their vehicle in these bays. These TMOs will need to be amended to create EV only bays allowing drivers of EVs to only park their vehicle there while charging. In non-CPZ areas new TMOs will need to be drafted to create EV only bays alongside charge points installed through this project so that EV drivers can park their vehicles in them whilst charging. The CPO will pay a fee for the use of these EV only bays. The fee level mirrors that which Source London currently pays for the use of EV only bays created alongside their charge points. The fee structure has been set for the whole London and is tier-based on London Underground travel zones. Brent spans zones 2, 3 and 4 and therefore for each EV only bay the Council would annually receive £500 for those located in zone 2, £400 for those in zone 3 and £200 for those in zone 4. Subject to final determination of charge point locations the Council will be paid £52,000 per year for the 160 charge points

6. The Tender Process

Overview

6.1 Procurement of the Contract was undertaken under the CCS DPS RM6213 for Electric Vehicle Charging Infrastructure on the basis of the pre-tender considerations and the Statement of Requirements developed for the invitation to tender.

6.2 The Council wrote to 55 potential bidders listed on the DPS that met the criteria for bidding. Out of those 55, 30 expressed an interest to be invited to the opportunity on the e-tendering portal and had access to the tender pack.

6.3 A call-off after a mini-competition from the DPS Agreement for the supply, installation, operation, and maintenance of up to 160 headed single electric vehicle charge points or a minimum of 80 dual headed charge points at a total of 80 locations across Brent was published on the London Portal on 14th September for the duration of 3 weeks until 7th October. The exact number, technical specification and mix of charge points will depend on the conditions at each of individual preliminarily identified locations. These will be surveyed and determined by the supplier as part of first phase of the project. The Contract is for 10 years with an option to extend for a further 5 years (total of up to 15 years) by way of an award from the CCS DPS RM6213.

6.4 The award process required Officers to identify the offer that best meets the stated requirements regarding quality (weighted at 50%), price schedule (weighted at 40%) and social value (weighted at 10%). These weightings differ from the usual weighting applied to contract award considerations because this contract is fully funded by both Uber and the Supplier (the CPO) and does not require additional funding from the Council. On this basis it was considered that a weighting adjusted from the proposed weighting set out in the March 2022 Cabinet Report in favour of a stronger emphasis on attracting the best quality bids and best value.

Evaluation Process

6.5 Tenders were opened on 14th September 2022 and all tenders had to be submitted electronically no later than 12 noon on 7th October 2022. Two valid bids were received. Each member of the evaluation panel read the tenders and carried out an initial evaluation of how well they considered each of the award criteria was addressed in the tender.

6.6 The tender evaluation process was carried out by a panel of officers from the Transportation Planning Team, supported by Procurement and Legal Services. The process consisted of 3 elements Quality, Social Value and Price being scored separately and the results from each section combined to give an overall MEAT (Most Economically Advantageous Tender) score for each bid.

6.7 The scoring scheme for the quality element is in table 1 below.

Table 1 - Scoring for Quality/Technical questions

Score	Definition	
0	The information required is either omitted or fundamentally fails to meet the relevant submission requirements to address the Council's requirements. Insufficient evidence to demonstrate that the relevant submission requirements or the Council's requirements can be met.	**Unacceptable**
1	The information submitted has insufficient evidence that the specified requirements can be met. Significant omissions, serious and/or many concerns.	**Major reservations**
2	The information submitted has some minor omissions in respect of the relevant submission requirements. The tender satisfies the basic minimum requirements in some respects but is unsatisfactory in other respects and raises some concerns.	**Some Reservations**
3	The information submitted provides some good evidence to meet the relevant submission requirements and/or the Council's requirements. It is satisfactory in most respects and there are no major concerns.	**Satisfactory**

4	The information submitted provides good evidence that all the relevant submission requirements and/or the Council's requirements can be met. Full and robust response, any concerns are addressed so that the proposal gives confidence.	**Good**
5	The information submitted provides good evidence that all the relevant submission requirements and/or the Council's requirements can be met, and the proposal is outstanding. Exemplary in the industry, provides full confidence and no concerns.	**Outstanding**

6.8 The panel met on 27th October 2022 and each submission was marked by the whole panel against the award criteria.

6.9 Officer evaluation and panel moderation identified the Bidder A as falling short of requirements and scoring two or lower on more than two technical questions and was subsequently declared non-compliant. Bidder B was deemed most appropriate to provide best quality, price and social value offer.

6.10 The names of the tenderers are contained in Appendix A. The scores received by the tenderers are included in Appendix B. Contractor B was the highest scoring tenderer. Officers therefore recommend the award of the contract to Contractor B, namely, Zest Eco Ltd.

6.11 It is proposed that the Contract commence in the week commencing 27th February 2023, subject to the Council's observation of the requirements of a standstill period noted in paragraph 8.2 below.

7.0 Financial Implications

7.1 The Council will pay the Charge Point Operator for the supply and installation of the electric vehicle charge points up to £1.04m (based on £6.5k per unit for 160 units) through its capital programme. This will be fully funded from the contributions from Uber highlighted in paragraph 3.4. The Council will have the option to extend the Contract for the management and maintenance of the charge points with the CPO or execute the option to remove electric vehicle charge points of which will be undertaken by the CPO at no cost to the Council.

7.2 In this arrangement, the Council is a lessor, where the CPO is using land owned by the Council for the charging points. This is an operating lease and has no impact on the Council's balance sheet. The Council will receive £0.52m over the 10 years of the contract for use of parking bays and will also receive a 1% share of the revenue generated through the charging points, which is projected to be £0.2m over 10 years. The CPO will cover all costs associated with the operation and maintenance of the points.

8.0 Legal Implications

8.1 The estimated value of the Contract for the supply, installation, operation and maintenance of electric vehicle charge points over its lifetime is in excess of the threshold for Supplies / Services and the award of the Contract is therefore governed by the Public Contracts Regulations 2015 (the "Regulations"). The award of the Contract for the supply, installation, operation and maintenance of electric vehicle charge points is subject to the Council's own Standing Orders in respect of Medium Value contracts and Financial Regulations.

8.2 Though the procurement is from a DPS, the Council will observe a minimum 10-calendar day standstill period before the Contract is awarded. Therefore, once the Cabinet has determined which tenderer should be awarded the contract, all tenderers will be issued with written notification of the contract award decisions. A minimum 10 calendar day standstill period will then be observed before the Contract is concluded – this period will begin the day after all Tenderers are sent notification of the award decisions – and additional debrief information will be provided to unsuccessful tenderers. As soon as possible, after the standstill period ends, the successful tenderers of the Contract will be issued with a letter of acceptance and the Contract can commence.

9.0 Equality Implications

9.1 The Council must, in the exercise of its functions, have 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 and known as the Public Sector Equality Duty.

9.2 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 are connected to that characteristic.

9.3 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.

9.4 The proposals in this report are subject to an equality analysis (see Appendix C) and Cabinet is referred to the contents.

10.0 Consultation with Ward Members and Stakeholders

10.1 Statutory and public consultation with ward members and stakeholders will be undertaken in line with statutory requirements and Council policy for each of the locations proposed for installation of electric vehicle charge points.

11.0 Human Resources/Property Implications (if appropriate)

11.1 This service will be provided by an external contractor. It will however be necessary for officers to:

- overlook and confirm the selection and confirmation at EVCP locations and Brent's public highway;
- change existing and write new traffic management orders;
- undertake public consultations; and
- manage the contract.

12.0 Public Services (Social Value) Act 2012

12.1 The Council is under duty pursuant to the Public Services (Social Value) Act 2012 ("the Social Value Act") to consider how services being procured might improve the economic, social and environmental well-being of its area; how, in conducting the procurement process, the Council might act with a view to securing that improvement; and whether the Council should undertake consultation. Despite the different elements of the Contract, Officers have had regard to considerations contained in the Social Value Act in relation to the procurement and more detail is provided below reflected in the social value requirements and the social action plan provided by the successful bidder.

12.2 Social Value was scored against the criteria in table 2 below.

Table 2 – Social value Criteria

Score	Definition	
0	The Social Value offer was omitted or fundamentally failed to meet the relevant Social Value measures. Insufficient evidence to demonstrate that the relevant submission requirements or the Council's requirements can be met.	**Unacceptable**
1	The Social Value offer is adequate but there is insufficient evidence to demonstrate that the relevant Social Value offer can be met. Significant omissions, serious and/or many concerns.	**Major reservations**

Score	Definition	
2	The Social Value offer has some minor omissions in respect of the relevant Social Value measures. The Social Value offer satisfies the basic minimum requirements in some respects but is unsatisfactory in other respects and raise some concerns.	**Some Reservations**
3	The Social Value offer submitted provides some good evidence to meet the relevant Social Value commitments offered in the Council's view. It is satisfactory in most respects and there are no major concerns.	**Satisfactory**
4	The Social Value offer submitted provides, in the Council's view, good evidence that all the Social Value commitments offered can be met. Full and robust response, any concerns are addressed so that the proposal gives confidence.	**Good**
5	The Social Value offer submitted provides strong evidence, in the Council's view, that all the Social Value commitments offered can be met and the proposal is outstanding. Provides full confidence and no concerns.	**Outstanding**

Contractor B provided commitments against the following 3 themes shown below.

Table 3 Contractors Social Value Commitment

Theme	Commitment
Every Opportunity to Succeed	A commitment to 8 apprentices over the life of the Contract. A minimum of 2 new apprentices and/or sustainable jobs for years 1, 5, 10 and 15 of this contract, whilst adhering to the following criteria: • Each person will be employed for 37.5 hours per week • We will aim for 100% of representation from women and/or BAME groups • We will ensure apprentices are on a training course with a training provider on the register of approved training providers ROATP, and on a National Apprenticeship Services Approved Occupational

	standard • We can confirm that 50% of the works will be delivered by our company and 50% will be delivered by our supply chain, including local SMEs. • We will also promote improved gender pay balance and representation for people with disabilities and mental health conditions within our supply chain.
Strong Foundations	• Training and Development around digital skills for residents and businesses. • Exploring forms of training and development around digital skills we will explore including: o Carrying out 5 on street demonstrations in the first 12 months of this contract o Carrying out 3 virtual training dates in the first 12 months of this contract o Offering digital skills courses for residents and businesses o Offering training courses for Resident Associations and voluntary groups o Contributing towards the sponsorship of community led initiatives o Leading workshops in schools and colleges targeted at underrepresented or disengaged groups. o Developing a digital presence.
A Cleaner, More Considerate Brent	• Planting 50 trees per year for the first 2 years of the contract, followed by 10 trees per year for the next 13 years, resulting in a total of 290 trees being planted for the duration of this contract. • Working with our supply chain to reduce plastic being used on packaging. Our contractors are requested to recycle any plastic that has been removed from the packaging. • Working with supply chain partners that use BEV vehicles to reduce travel and carbon emissions.

Related Documents:
Cabinet Report titled: Partnership and Funding Agreement with Uber 7 March 2022
Infrastructure Funding Agreement 13 April 2022

Report sign off:

Alice Lester
Director for Regeneration, Growth and Employment

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

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APPENDIX B

Electric Vehicle Charging Infrastructure Solution

TENDER EVALUATION GRID

Moderation Sheet

Project title - DN631299

Quality		Weighting	Contractor A		Contractor B	
		5	Score	Result	Score	Result
1	Question 1 Please outline how your general proposed chargepoint solution meets or exceeds the stated requirements? (2000 words)	20%	2	8.00%	4	16.00%
2	Question 2 Please describe your approach to safety management and how all personnel involved in the delivery, whether employed directly or sub-contracted, have the required level of competency to deliver the work? (1000 words	10%	2	4.00%	3	6.00%
3	Question 3 Please detail how you ensure a robust site review, survey, and design process? (1000 words)	10%	2	4.00%	4	8.00%
4	Question 4 Please describe your process for managing the installation and commissioning process? (1000 words)	10%	2	4.00%	5	10.00%
5	Question 5 The chargepoint installations should be designed and installed to be as accessible as possible. Please describe how you maximise accessibility of chargepoint installs? (1000 words)	7.5%	3	4.50%	4	6.00%
6	Question 6 Please describe how you will deliver high quality, highly reliable chargepoint service operation? (1000 words)	10%	4	8.00%	4	8.00%
7	Question 7 Please describe how industry leading reliable and safe operation is achieved through scheduled servicing, proactive maintenance, and reactive maintenance? (1000 words)	10%	3	6.00%	4	8.00%
8	Question 8 Please explain how you will ensure excellent user experience and support at all times? (1000 words)	10%	3	6.00%	4	8.00%
9	Question 9 Please describe how you ensure the security (physical and cyber) or all chargepoint components and systems (inc. payment systems)? (1000 words)	7.5%	2	3.00%	4	6.00%
10	Question 10 The Authority is committed to making the Council carbon neutral by 2030 and carbon zero by 2050. Please explain what your organisation is doing to reduce its impact on Climate Change? As one of the Authority's lead partners in its response to the emergency, how will you deliver a net zero contract by 2030? (1000 words)	5%	4	4.00%	4	4.00%
Total out of 100%		**100%**	**51.50%**		**80.00%**	
Total out of 50%		**50%**	**25.8%**		**40.0%**	

Social Value		Weighting	Contractor A		Contractor B	
		5	Score	Result	Score	Result
1	Strong foundations	**3%**	4	**2.40%**	3	**1.80%**
2	Every opportunity to succeed	**4%**	4	**3.20%**	4	**3.20%**
4	A cleaner, more considerate Brent	**3%**	3	**1.80%**	3	**1.80%**
Total out of 10%		**10%**	**7.4%**		**6.8%**	

Commercial		Weighting	Contractor A	Contractor B
8	Costs submission	40%	N/A	£48,400.00
Total		**40%**	**0.00%**	**40.00%**

Summary	Weighting	Contractor A	Contractor B
Quality	50%	25.75%	40.00%
Social Value	10%	7.40%	6.80%
Commercial	40%	N/A	40.00%
Total	**100%**	**33.15%**	**86.80%**

Ranking		1

*Contractor A - Scored 2 on more than 2 questions on technical evaluation and therefore were deemed to fail overall and are excluded from the process.

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EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	AUTHORITY TO AWARD A CONTRACT FROM A DYNAMIC PURCHASING VEHICLE FOR SERVICES RELATING TO THE SUPPLY, INSTALLATION, OPERATION AND MAINTENANCE OF ELECTRIC VEHICLE CHARGE POINTS
DEPARTMENT:	Communities and Regeneration
TEAM:	Transportation Planning
LEAD OFFICER:	Annekatrin Dennemann
DATE:	January 2023

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.

Interest in electric cars has grown significantly over the past few years, thanks in part to the Government's ban on petrol and diesel car sales by 2030. In order to support the switch to electric, the Council has sought to support drivers to transition to electric vehicles through the delivery of a growing network of public charging infrastructure on Brent streets.

Following Cabinet approval on 7th March 2022 the Council entered into an Infrastructure Funding Agreement (IFA) with Uber on 13th April 2022 to further expand Brents' existing network of publicly accessible Electric Vehicle Charging Points (EVCP). Uber has agreed in the IFA to part-fund up to 160 new on-street charge points at 80 locations across Brent. The IFA sets out the terms and conditions of the funding and the requirement for the Council to appoint a Charging Point Operator (CPO) who will contribute the remainder of the required funding as well as supply, install, operate and maintain the charge points.

The charge points delivered through the partnership with Uber will be available for use by its drivers as well as the wider public, thereby supporting the transition to EVs of other Brent drivers too.

Taxi and private hire vehicles are typically high mileage drivers who's vehicles therefore emit significant CO2 as well as Nox, PM10 and PM2.5 pollutants. Supporting drivers, particularly those working in the taxi and private hire ride-hailing sector, to transition to EVs through the supply of conveniently located charging facilities links directly to the Council's climate change and air quality objectives and addresses the growing demand by residents for on street EV charging facilities. The charge points will be help to give Brent residents access to EV charging and make Brent's air cleaner and healthier thereby benefitting all the health of all those living, studying, working or visiting Brent.

The IFA further sets out that the charge points need to be located no further than 500 meters from Uber drivers' homes, this will not however give them priority access to the CPs. Each charge point will be provided with a dedicated EV only bay where EV drivers will be allowed to park whilst charging their vehicle. Suitable locations on the public highway have been identified in existing residential parking bays, subject to further detailed technical feasibility studies, according to a set of criteria that will ensure that locations and footways remain accessible. Considerations included:

- Avoiding disabled parking bays to ensure continued provision (no disabled bays are proposed to be removed),
- Clearance of a minimum of two metres to lampcollumns and other electrical infrastructure,
- Avoiding existing street trees or streets where new trees or proposed in order not to affect their roots during installation or limit locations where new trees can be planted;
- Prioritising locations not directly outside residents' front doors instead choosing, where possible, flank walls and street junction locations, and
- Staying clear of private drives.

As part of the procurement process a detailed statement of requirements was set out requiring the CPO to undertake a host of services including the following:

- assess and confirm suitability of pre-selected locations for charge points,
- assess and confirm suitability of alternative locations for charge points as necessary,
- propose suitable charge point models for individual sites as necessary,
- making good of site post installation as necessary.

Detailed on site location feasibility will take into account suitability of available underground electrical connections as well as other factors that may become more apparent once on site. For example, whilst it is anticipated that most charge point columns will be located on the footway, it may in some cases be necessary to provide a build out to position the charge point on so that pedestrian and disabled accessibility on the footway or accessibility for disabled drivers to the charge point it self is maintained or specifically provided.

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

The charge points are intended to provide improved access to electric vehicle charging, especially to those without access to private car parking and therefore not able to install a private charge point at their home. Access to convenient EV charging facilities is seen as a key factor in supporting the transition from petrol and diesel cars to EVs.

Other groups affected by the proposals for additional charge points include:

Age and Sex

While the new charge points offer a newly improved service to Brent residents, older people, women and other some other persons may potentially feel, depending on individual site conditions, vulnerable at the CP locations due to factors such as poor lighting or lack of natural surveillance. To migitgate this CP locations will be chosen to be in well lit places and

additional lighting will be added where found to be necessary so that concerns around visibility often associated with crime or fear of crime can be posititvely addressed. Wherever possible, sites will be chosen that are overlooked by nearby windows.

One of the positive aspects of the new charge points is that as part of the Council's contract with the CPO apprenticeships will be offered as part of the CPO's stated social value contribution, most likely to younger people. Training and employment opportunities, particularly in the growing green employment market, provide a clear benefit and positive outcome.

Race/Ethnicity

Brent is the second most ethnically diverse borough in London - 64% of the local population is from Black, Asian and other minority groups and over 149 different languages are spoken. Individuals that are not sufficiently fluent in English may find it difficult to follow user instructions displayed in English on the charge points' screens. In order to address this the CPO is required to ensure that information, screens and user interface elements shall:

- be in English by default, preferably with the ability to configure and support additional languages with a preference for languages other than English known to be most commonly spoken in Brent including Polish, Rumanian, Arabic, Somali, Portuguese, Farsi and Urdu.
- Instructions should make use of symbols and/or pictograms where possible.
- Instrucstions should be presented in an accessible format such as: plain English, large consistent fonts, easily recognisable symbols, avoid jargon and acronyms.

Disability

It is important that no one is left behind in the switch to electric – particularly disabled people or those with specific accessibility requirements. Motability, the charity, have worked with the UK Government Office for Zero Emission Vehicles (OZEV) to sponsor a new accessibility standard for public EV chargepoints, developed by the British Standards Institute (BSI).

As a Publicly Available Specification (PAS), it will be the first standard of its kind to set out what is needed for public charging to be inclusive to everyone – helping to ensure that people with limited mobility, neurodiverse conditions and other accessibility requirements are being considered. It sets out the minimum accessibility requirements for EV chargepoints, and also includes settings where more enhanced accessibility measures can be used.

As part of the tender pack for the supplier and operator contract the Statement of Requirements set out that the design and layout of charge point installations shall maximise accessibility for all users including disabled users. Suppliers were specifically asked to consider provisions in the draft PAS 1899 standard.

In response the successful bidder stated that they will design in accordance with the requirements of British Parking Association, DFT, The Government's UK Electric Vehicle Infrastructure Strategy and PAS 1899:2022 on Electric vehicles - Accessible charging. Their on-street design will adhere to Transport for London's Electric vehicle charging infrastructure: Location guidance for London to ensure they create solutions that minimise intrusion of on-street space and complement the environmental location. Chargepoints (including signage, posts and bollards) will not obstruct pavements or highways, or present a safety risk to street scene users, and the design and layout will maximise accessibility for all users, including for example build outs for CPs to make them more accessible to disabled drivers.

In addition, the CPO is required to provide digital software solutions in apps and online should that seek to comply with W3C accessibility standards to ensure widest possible access including for people with auditory, cognitive, neurological, physical, speech, and visual disabilities.

All Groups

The supplier is also required to ensure that the usage of the proposed chargepoints shall be intuitive for the end user. This includes the instructions and information that is displayed to the user before/during/after a charging session and how this information is communicated. The CPO will offer 24/7 helpdesk coverage to users of the Charging Points.

Charging costs shall be clearly indicated throughout the charging process. The Charging Points will include a contactless payment option for PAYG users benefiting those drivers who don't want to sign up to an App or contract with the CPO.

In their tender submission the successful bidder also noted that on-street charge points need to be positioned carefully to avoid negatively impacting pedestrians and other highways users, and to be accepted by communities, especially where there are already parking and pavement pressures.

There will also be a socio economic impact for those drivers who feel they can't afford an EV. The provision of EVs and EV only bays may be seen as a negative impact on these groups as the EV only bays will reduce in the short to mid term the availability of unrestricted on street residential parking. However, the charge points should to be seen in the context of this transition process towards a point where the majority of cars will be EVs so that more and more drivers will require access to charge points and at least a proportion of these will be supplied on street. As a result, drivers who may not feel that they are in a position to benefit from these charge points yet, may be able to use them in the future. The number of EV only bays is not thought to be significant enough to affect other drivers' access to on street parking in a significant way.

Public consultations will be undertaken for each charge point location informing residents within the individual consultation areas of the proposal to install EV charge points and EV only bays and asking them if they agree or disagree with the proposal. The outcome of each the consultation will determine if that particular charge point will progress towards installation.

In summary, there potentially will be some impact on some individuals but the overall impact is thought to be a positive one and mitigating measures will be put in place wherever applicable and possible.

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. The legal duty is set out at Section 149 of the Equalities Act 2010.

Under s.149, public bodies such as council's must, in the exercise of their functions, have "due regard" to the need to:

- Eliminate unlawful discrimination, harassment and victimisation

- Advance equality of opportunity between people who share a "protected characteristic" and those who do not

- Foster good relations between people who share a protected characteristic and those who do not

The equality duty arises when the council is deciding how to provide electric vehicles charging points and EV only bays on the public highway.

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

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

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

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

SECTION B – IMPACTS ANALYSIS

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

In conducting this analysis a variety of data sources were considered, primarily to develop an understanding of the borough's demographic profile both now and in the future. This has helped identify potential impacts to protected characteristic groups and areas of expected demand.

A list of sources considered is included below:

Brent Open Data

- Equality Profile of Brent (2019)
- Population Change in Brent (2019)
- Brent JSNA Indices of Deprivation (2019)
- Brent Resident Attitudes Survey (2018)
- Air Quality Brent JSNA 2019/20

Brent Resources

- Brent Inclusive Growth Strategy (2019 - 2040) and IGS Research Base

Other

- ONS Mid-Year Population Estimates (2019)
- The Mayor for London's: A Safer City for Women and Girls Strategy (2018 – 2021)
- WHO Report: Air Pollution and Child Health: Prescribing Clean Air (2018)

A summary of the key findings from this research is included below:

A growing population –

The population of Brent increased by 27% between 1998-2018. Projections indicate that this pace of growth is set to continue: the population is expected to rise by a further 25% by 2041, faster than the London average (22%) and more than double the England average (10%). If realised, this would equate to an additional 84,800 residents by 2041.

A young, but ageing population –

Brent has a relatively young population. In 2018, the median age of the population was 35 in Brent, the same as in London, but five years lower than the national average (40 years, England). However, in line with national trends, the population is ageing: by 2041, the number of Brent residents aged 65 and over is projected to increase by 85% – an additional 34,900 older residents by 2041. The child population is also expected to grow, albeit more slowly, 12% by 2041 (+8,600 children).

Disability –

Around one in seven Brent residents have a long-term health problem or disability that limits their day-to-day-activities in some way. The prevalence of disability rises sharply with age: more than half of all residents aged 65 and over had a long-term health problem or disability.

Race –

Almost two thirds (65%) of the Brent population are from Black, Asian and minority ethnic groups. Brent's largest single ethnic group is the Indian population – who comprise 17% of residents – the fourth largest in London. Brent is the second most ethnically diverse borough in London, after Newham (according to the Simpson's Diversity Index).

Sex –

The gender split in the population is 51% male and 49% female. The proportion of men is highest in the 20-34 age group where they comprise 54% of the population. In contrast, women make up a higher proportion of the Borough's elderly population: 62% of those aged 85 and over are female.

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

AGE	
Details of impacts identified	**Positive** • Provision of electric vehicles charge points supports the transition to EVs and therefore supports the reduction of CO2, NOx, PM10 and PM2.5 emissions. Studies have shown that air pollution affects children aged under five in uniquely damaging ways. Brent has a higher proportion of children aged under five (8% - estimated 28,797) compared to the rest of the UK (5%), and while overall air pollution in Brent is declining, there remain several air quality hotspots in the Borough. Older people too are particularly vulnerable to poor air quality. The social value aspects of the contract includes: o 290 trees that will be planted over the contract period to support improvements to Brent's air quaility. o Minimum of 6 new apprentices will be trained and/or new sustainable jobs and/or new jobs will be created over the contract period.

	○ Carrying out 5 on street demonstrations in the first 12 months of this contract ○ Carrying out 3 virtual training dates in the first 12 months of this contract ○ Offering digital skills courses for residents and businesses ○ Offering training courses for Resident Associations and voluntary groups ○ Contributing towards the sponsorship of community led initiatives ○ Leading workshops in schools and colleges targeted at underrepresented or disengaged groups • Additional lighting provided in areas where required ensures all customers, particularly from vulnerable groups such as the elderly, feel safe to charge.
DISABILITY	
Details of impacts identified	**Positive** • Around one-in-seven (estimated 46,168) Brent residents have a long-term health condition or disability that limits their day-to-day activities. Due regard to the accessibility of the EV charging services provided would have a positive effect on this group: ○ Systems for cashless charging services are designed against the background of the W3C Web Content Accessibility Guidelines and to be accessible to individuals with a range of disabilities. Arrangements to support impairment or learning disability include: ○ 365/24/7 Customer Service Helpdesk in partnership with the AA. Service users are fully supported with using chargepoints and all communities can access the charging solution. ○ Site designs compliant with B 8300-1:2018. Socket height and interface are positioned to improve accessibility. ○ Plans for alignment with future BSI/Motability accessibility standards to ensure continued to delivery of the latest in accessibility. ○ Trialling specialised accessible hardware when it becomes available within Brent to drive forward R&D to provide a fully accessible solution. ○ Adhering to PAS: 1899:2022 requirements.

	○ Dedicated disabled bays and wheelchair accessible islands provided where necessary supporting equal access to charging for all Brent residents. ○ Clear notes on media platforms such as ZapMap ensure users can easily find accessible chargepoints. ○ Additional lighting provided in areas where required ensures all customers, particularly from vulnerable groups, feel safe to charge. ○ Customers with hearing impairments will benefit from the simplicity of downloadable apps. ○ Near Field Communication (NFC) technology for payments, which can be a welcome solution for many customers. Customers have a choice of payment options, including contactless, pay-as-you-go, RFID cards and in-app payment. ○ Chargepoint icons are visually colour coded to signal if they're currently in use (pink) or available (green). ○ Instructions will make use of symbols and/or pictograms where possible for those with learning difficulties or remaining language barriers.
RACE	
Details of impacts identified	**Neutral** The CPO is required to ensure charge point information, screens and user interface elements shall: ○ Be in English by default, preferably with the ability to configure and support additional languages. ○ Preferred additional language support for languages most commonly spoken in Brent: Polish, Romanian, Arabic, Somali, Portuguese, Farsi, Urdu. ○ Instructions should make use of symbols and/or pictograms where possible. ○ Presented in an accessible format such as: plain English, large consistent fonts, easily recognisable symbols, avoid jargon and acronyms.
SEX	

Details of impacts identified	**Neutral** ○ Additional lighting provided in areas where required ensures all customers, particularly from vulnerable groups such as women, feel safe to charge.
SEXUAL ORIENTATION	
Details of impacts identified	**Neutral**
PREGANCY AND MATERNITY	
Details of impacts identified	**Neutral**

RELIGION OR BELIEF	
Details of impacts identified	**Neutral**
GENDER REASSIGNMENT	
Details of impacts identified	**Neutral**
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	**Neutral**

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 Brent Long Term Transport Strategy set out objectives to support Brent drivers to transition to EVs. The strategy was consulted on borough wide. Following a good and representative level of support for its aims and objectives the strategy was formally approved by Cabinet.
Further public consultation of local residents will be undertaken on a site by site basis.

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

There will also be a socio economic impact for those drivers who feel they can't afford an EV. The provision of EVs and EV only bays may be seen as a negative impact on these groups as the EV only bays will reduce in the short to mid term the availability of unrestricted on street residential parking.
However, the charge points should to be seen in the context of this transition process towards a point where the majority of cars will be EVs so that more and more drivers will require access to charge points and at least a proportion of these will be supplied on street. As a result, drivers who may not feel that they are in a position to benefit from these charge points yet, may be

able to use them in the future. The number of EV only bays is not thought to be significant enough to affect other drivers' access to on street parking in a significant way.

6. If, following your action plan, negative 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?

Remote as well as on site systems will be put in place to monitor the EVCPs' level and pattern of usage, functionality and performance so that the anticipated growth in usage of charge points and service performance can be analysed. This will inform any adjustments to the EVCPs service as necessary.

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 new electric vehicle charging points will proive an overall a positive impact for all due to their role in reducing air pollution. They will help to meet governmental, mayoral and council targets to improve air quality through and by supporting the transition to EVs by expanding Brent's network of EVCPs to provide Brent's drivers with more opportunities to charge their EVs in the near future and for years to come.
Continued review and monitoring will be undertaken to establish if any concerns or issues arise and to evaluate their effectiveness.

SECTION D – RESULT

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

SECTION E - ACTION PLAN

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

Action	Expected outcome	Officer	Completion Date
Monitor and evaluate the EVCPs' effectiveness to explore any arrising issues and review the EA where necessary.	Continued improvement of EVCP service for EV drivers and air quality for all as EV & charge point technology and their uptake evolve.	Lead Project Officer (tbc)	Initially Annually for the duration of the contract.

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Annekatrin Dennemann 17.01.2023
REVIEWING OFFICER:	Angela Chaudry 23.01.2023
HEAD OF SERVICE:	Gerry Ansell 24.01.2023

Brent	**Cabinet** 6th February 2023
	Report from the Corporate Director of Resident Services

Improving the Customer Experience in Brent Civic Centre

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	One Appendix1: Floor plans and potential designs
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Thomas Cattermole, Director of Customer Access 020 8937 5446 Thomas.Cattermole@brent.gov.uk Megan McGeown, Senior Transformation Officer 020 8937 5424 megan.mcgeown@brent.gov.uk

1.0 Purpose of the Report

1.0 This report seeks Cabinet approval for plans to redesign the face-to-face public spaces in Brent Civic Centre. This will allow the Council to deliver an improved service to our residents and customers. The project will cost £1.96 million, with the building works scheduled to be completed by December 2023.

1.1 The report provides an overview of the project's stages, up to this point, and outlines the benefits that the redesign would deliver. This includes improvements to accessibility, expanding our Hubs and Self-Service and Libraries, Arts and Heritage offer, and unlocking efficiencies in how customer-facing services operate.

2.0 Recommendation(s)

2.1 Cabinet is asked to approve the plans to redesign customer spaces in Brent Civic Centre.

2.2 Approve a budget of £1.96m for the redesign work and inclusion within the Capital Programme.

2.3 Support the Libraries, Arts and Heritage Service to submit a National Lottery Heritage Fund bid and delegate authority to the Corporate Director of Resident Services to make decisions regarding this funding bid on the Council's behalf.

3.0 Introduction

3.1 The redesign project seeks to improve the public spaces in the Civic Centre, with a focus on the Hub, Library, Mezzanine floor and Customer Service Centre (CSC). The redesign will support an expanded offer from the Hub, Libraries, Arts and Heritage Service, Children and Young People Service, digital self-service and Brent Hubs. It will help to overcome current problems to ensure that all customer spaces in the Civic Centre are fully utilised, safe and, most importantly, accessible for all residents.

3.2 In 2021, the Council launched the Customer Access project to help improve the way that customers and residents access services in the Civic Centre. This followed shifts in customer behaviour following the Covid pandemic, which has seen more customers accessing services online and a change in the profile of customers visiting the CSC. In particular, there has been an increase in the number of customers presenting with complex needs. This pressure has only increased with the opening of the Community Hub at the Civic Centre. In line with the new Brent Customer Promise, the goal of the redesign is to ensure that all residents and customers find services accessible and easy to use. We want to ensure that all customers feel listened to and understood, with their enquiry resolved quickly and ideally at the first point of contact. The redesign will support these ambitions, allowing customer-facing staff to operate in a holistic and integrated way to better support our residents.

3.3 From the outset, the project's objectives have been shaped by feedback from residents, as well as frontline staff working across Council Directorates. We have gathered insights through surveys, in-depth resident and staff focus groups and large-scale staff workshops, as well as piloting and protoyping new ways of working in the Civic Centre. This process has ensured that the improvement plans respond to the needs and wants of our residents.

3.4 The insight and pilot activities have already helped to formulate a new joined up approach to delivering face-to-face services in the Civic Centre, as part of our new way of working. This includes a mobile 'meet and greet' team that welcomes customers entering the building and guides them to the service they need. This provides customers with a friendly welcome to the building and helps to resolve simple enquiries quickly, avoiding a situation where customers are referred between multiple services. Crucially, this new joined up approach is prioritising support for residents with the most complex needs. It also avoids unnecessary duplication of services across the Library, CSC and Hub. With the

new integrated service in place, we now desperately require layout changes to optimise service delivery and unlock further efficiencies.

3.5 In March 2022, the Council Management Team (CMT) agreed to commission an architect to carry out a feasibility design study of the Civic Centre's public-facing spaces. Willmott Dixon Interiors (WDI) were commissioned to complete this work. WDI have considered how the space can better accommodate the new face-to-face offer of the Community Hub and revised Customer Service triage system, with a particular focus on improving accessibility and the offer for residents with complex needs. WDI has developed a design that meets all of our current objectives, whilst ensuring flexibility for future use of the space.

3.6 On Tuesday 20 December 2022, the Council's Capital Programme Board endorsed capital spending of £1.96m to enable the redesign of the Civic Centre's face-to-face public spaces. This is based on designs developed by WDI. The investment will be funded through borrowing, which will be reduced following a successful Heritage bid for funding. This borrowing will cost a maximum of £242k per annum over a 10-year period but will reduce based on the amount of grant funding achieved. The repayment will be funded through savings to be identified across the Customer Access budget, primarily in Customer Services, Libraries, Arts and Heritage, and Revenue and Debt.

3.7 As part of this project, the Libraries, Arts and Heritage Service intend to expand their Arts and Heritage offer at the Civic Centre. The Service wants to seek external funding for these elements by making a funding bid to the National Lottery Heritage Fund. Proposals to create an exhibition space in Wembley Library will be included in this bid. It is intended that this will form part of a wider project that the service is planning for 2023-2026. Additional funding for these elements may also be available through the third round of Arts Council England's 'Libraries Improvement Fund', which is expected to open in Spring 2023. This funding is available to support libraries to become more sustainable and to reach new communities in order to increase library usage and improve digital access.

3.8 The proposed redesign of the customer-facing areas will see changes to Wembley Library and the CSC on the ground and mezzanine floors. It is intended that the building improvements will be carried out by an external contractor and completed by December 2023. The layout changes will support the new way that customer-facing services in the Civic Centre operate. The redesign will deliver a space that is welcoming, comfortable and accessible for residents who are seeking support. The space will also have improved lighting, acoustics and temperature regulation. Without the layout changes, the customer experience will continue to be compromised and efficiencies cannot be released.

3.9 Key layout changes include:

- Changing the main entrance to the Civic Centre for customers/residents.
- Expanding the Libraries, Arts and Heritage offer.
- Improved Children's library able to accommodate larger groups.
- Safer, larger study areas.

- Dedicated CYP high-risk contact family spaces.
- Replacing the spiral staircase in the current CSC with a standard staircase for ease of access.
- Addressing acoustic and lighting issues.

3.10 The building redesign will deliver the following key improvements:

3.11 **Expanded offer**: The redesign will ensure that all customer-facing spaces are fully utilised, which includes making use of the mezzanine floor space that is currently wasted. Optimising usage of the space will support an expanded Library and Hubs offer. In addition, the new layout will provide a CYP Family Room for high-risk contact visits, an enclosed Children's Library space, and study spaces on the mezzanine floor. The new spaces will be flexible and multi-use, meaning that the functions of these spaces can shift in accordance with the needs of future customers.

3.12 **Integrated services**: All Customer Services and Hub staff in the Civic Centre have operated in a more joined-up way for over a year now. As part of this, customers with complex needs are now triaged quickly by a Customer Service Officer and directed to a Hub Advisor. This new multi-service approach is helping to prevent teams working in silos, and avoiding the duplication of services. Ultimately, this will help to unlock savings and efficiencies, as staff will no longer run the same service in multiple locations within the Civic Centre. The new layout will support this integrated approach to supporting residents.

3.13 **New entrance**: With the improved layout, residents will enter the building through a new main entrance on Exhibition Way by Sainsbury's. This follows feedback from residents that the current entrance is overwhelming, unwelcoming, intimidating and very cold in the winter months. Instead, residents will now enter into a dedicated space where they can immediately be triaged and directed to the service that they need. Customers will now have a clear journey through the building.

3.14 **Temperature**: The new layout will resolve current issues with the temperature of the atrium. The atrium's temperature is similar to outside which means that, during the winter, conditions are extremely uncomfortable for customers and staff. A Health and Safety concern has been raised for staff who spend hours meeting customers in this space. It also creates an unwelcoming and hostile environment for residents visiting the building. The improved layout will see residents enter through a new ground floor entrance, into a vestibule, that will help to maintain heat in the building. This layout will help to ensure that the Civic Centre provides a warm space for residents, which is increasingly critical given the current economic and energy crisis.

3.15 **Welcome Desk**: Currently, residents seeking support and business visitors to the Civic Centre queue together at the Welcome Desk. This contributes to delays and confusion for both customers and visitors. Potential businesses looking to hire floors in the Civic Centre have expressed concerns about the current setup as visitors, including those arriving for interviews, meetings and conferences, are often delayed at the Welcome Desk. The new layout will mean

that the smaller Welcome Desk is dedicated to business visitors. This will ensure that the Civic Centre represents a more appealing location for businesses and/or organisations wanting to rent office space. This pressure on the Welcome Desk to triage visitors will only increase with the restacking of the building. Without these changes, there is a risk that the forecasted additional income of almost £750,000 per annum, generated by renting out further floors, could be jeopardised.

3.16 **Accessibility**: The new layout will support an expanded Brent Hubs offer and provide expanded facilities for triaging customers. This will ensure that residents with the most complex needs, including those with special educational needs and disabilities (SEND) and/or mental health challenges, receive the dedicated support they need. The redesign is also an opportunity to ensure that the customer space is physically accessible, including for those with wheelchairs and pushchairs. This will allow the Council to meet its obligations as committed to under the British Sign Language (BSL) Charter and the new Brent Customer Promise.

3.17 **Digital access**: The new layout will provide a dedicated digital area to support residents. This is in contrast to the current setup in which there are multiple digital areas provided by the Library and CSC. This digital support area will be located close to where the Hubs and CSC operate, so that staff can provide digital support whilst managing staffing levels effectively.

3.18 It should be noted that the new integrated way of working, and the redesign plans, have stemmed from comprehensive research and engagement with residents and staff. Feedback from residents and customers during the pilot and prototype phases of the project demonstrate that they support these changes. The redesign will allow services to operate in a more integrated and holistic way and ensure that the space is better utilised to the benefit of our residents.

4.0 Detail

Background

4.1 The Covid pandemic fundamentally changed the way in which our residents and customers access Council services. A higher proportion of customers are accessing our services online, rather than wanting a face-to-face service. This shift was most notable during the lockdown periods, however the trend has continued since the reopening of customer-facing services in July 2021. In recognition of this trend, it was agreed in 2021 to permanently reduce the CSC opening times to four hours a day. We have witnessed a reduction of simple, transactional visits to the Civic Centre (such as handing in documents) but an increase in visits by those residents with more complex needs. Reduced footfall to the Civic Centre now means that certain spaces in the building, such as the CSC space on the mezzanine floor, are severely under-utilised.

4.2 Alongside reduced footfall, we have witnessed that those seeking a face-to-face service are more likely to have complex needs. In early 2021, the decision

was made to have a Hub within the Civic Centre. We were conscious that the integration of a Hub in the building required careful planning. A key reason for the initial development of the Hub model in Brent was because some cohorts of residents found the Civic Centre intimidating, and the Council needed to develop a more informal, community-based face-to-face offer. Although the Hub offer can best meet the need of residents with complex needs, the current Civic Centre design and layout does not support this. The space is not tailored to the needs of our Hub clients. This is a growing problem since the cost of living crisis has only increased the demand for Hub services.

4.3 The overall purpose of this Customer Access project was to improve our residents' experiences of visiting the Civic Centre. There were also areas of inefficiency and duplicated services, for example digital support offered by both the CSC and the Library. This was contributing to confusion for customers, and delays in service delivery.

4.4 The shift in customer behaviour, hastened by the Covid pandemic, has provided an opportunity to drastically improve the way that we deliver face-to-face services at the Civic Centre. This project is the first time that customer-facing services, and the layout, have been reviewed since the Civic Centre first opened in 2013. The ultimate aim is to provide a better experience for residents, and ensure that all of our residents find it easy to get the support they need.

Visioning Workshop

4.5 One of the first exploratory activities that we undertook, to investigate the current effectiveness of customer-facing services, was a visioning workshop. This took place on 5 July 2021 and brought together colleagues with front-facing roles across nine different service areas. The objective of the workshop was to understand current challenges and generate ideas for how services could improve their offer to residents. Colleagues were encouraged to put the needs and requirements of our residents at the forefront of this process.

4.6 Prior to the workshop, we gathered preliminary feedback from customers on their experience of the Civic Centre. These were shared with colleagues at the workshop. In response to these insights, staff members participated in a number of activities to understand the customer journey, from start to finish. This involved working together to identify the key challenges facing customers and staff when accessing and delivering face-to-face services. Colleagues also generated new ideas on how services could work together differently to deliver an improved customer experience.

4.7 Feedback from staff during the visioning workshop, and from customers/ residents and stakeholders prior to the workshop, identified the following:

- The Civic Centre building is intimidating for first-time visitors, particularly due to the lack of signage in the space.
- The CSC is hidden and the customer journey through the building is unclear.
- The CSC mezzanine floor is severely underutilised and currently represents wasted space.

- There is an issue with noise traveling between floors, particularly between the Library and mezzanine floor, which is distracting for users. This is particularly an issue during ‘rhyme time’ activities when children are visiting the library.
- There is a lack of private or appropriate meeting spaces. In addition:
  - CYP does not have an appropriate family-friendly room for supervised high-risk contact visits and not enough meeting rooms to see clients face-to-face.
  - Our Housing Needs customers, who are often homeless, sit in the Civic Centre reception. They are denied privacy and dignity.
- The current spaces lack flexibility. For example, when the CSC closes for the day, the space cannot be utilised by other services due to the technology and equipment in the space.
- Teams currently work in silos, which can lead to an inefficient and inconsistent service for customers and residents. For example:
  - Customer Services, the Libraries and Hubs all work independently with overlapping partner organisations.
  - Each area offers some level of digital support and assistance to customers.
  - Colleagues felt that we did not need three areas in the same building independently offering the same or similar service. It would be more efficient, and better for customers, for services to have a collaborative approach.

Prototype

4.8 Following the visioning workshop in July 2021, we conducted a Civic Centre user survey from 23 August to 30 September 2021. The survey found that 24% of all visits related to handing in supporting documents. It also revealed that 59% of visitors had no access to the internet. Of these people, 13% said they had poor computer literacy and 11% described themselves as experiencing a language barrier.

4.9 Using the insights from the visioning workshop and user survey, we developed a prototype for how customer-facing services could operate differently in the Civic Centre. The prototype explored having an integrated and dedicated digital support and customer area, with a mobile triage service. The mobile service meant that, as opposed to having customers wait at the Welcome Desk, customer-facing staff would meet customers on arrival and assist them with navigation of the building. We decided that frontline staff would lead the process of developing and testing the prototype.

4.10 In October 2021, a staff-led project team consisting of staff from the CSC, Libraries and Hubs came together to design and develop the prototype. The team tested the ‘Civic Centre Face-to-Face Offer Redesign Prototype’ from 4 October to 19 November 2021. The testing and development process involved staff from the CSC, Libraries, Hubs, Community Wellbeing, Facilities Management (FM) and external partners. During this time, the team developed and tested the new setup, and engaged with over 500 customers/residents. The results from the prototype were promising. Customers reported receiving an

improved service and attributed this to increased collaboration between services.

Pilot

4.11 In November 2021, CMT agreed for the prototype to be developed into a pilot. The 'Redesign of Face-to-Face Services Pilot' ran from 1 December 2021 to 28 February 2022. Over this period, staff greeted more than 2,600 residents visiting the building. The pilot took forward ideas developed during the prototype phase of the project and evaluated them on a larger scale. The pilot tested having a mobile meet and greet service, an assisted self-service area, and a multi-service offer from the Hubs and CSC.

4.12 The pilot found that the revised arrangements gave customers an improved experience. As such, in March 2022, CMT approved the roll out this new model of delivering face-to-face services within the Civic Centre. The structures within Customer Access and the Hubs were reviewed to support this new model and increase the capacity of the Hubs team. However, as explored below, the pilot also demonstrated that the current layout is a challenge for effective and efficient service delivery.

<u>Mobile Meet and Greet:</u>

4.13 The pilot tested there being a mobile meet and greet team in the Civic Centre, which welcomed customers into the building and escorted them to the relevant service. We found that this new service helped to reduce confusion for customers entering the atrium and helped to ensure that enquiries were resolved quickly.

4.14 Although the new service has been positively received by customers, there are challenges with delivering this service in the current space. There is no designated space in the atrium for staff to help customers resolve quick enquiries, and the Wi-Fi connection is unreliable. In addition, the temperatures have been uncomfortably low in the atrium for residents and colleagues. The atrium is unheated meaning that, during the winter, the temperature has fallen below ten degrees. These are unsuitable conditions for staff to work in, and for residents to be supported in. It is particularly inappropriate given that a growing number of residents are seeking a warm space in the context of the cost of living crisis.

<u>Library Study Space on the Mezzanine Floor:</u>

4.15 As part of the pilot, we tested using the mezzanine floor as additional library and study space for students. The space is now better utilised and is no longer empty. The overall feedback has been positive with the majority of users preferring the new study spaces. This additional study space has proven valuable, particularly during exam periods.

4.16 However, safeguarding concerns have been used raised with regard to young people using the upstairs study space. This problem can only be resolved by

redesigning the space with the safety of young people as a specific consideration.

Self-Service and Assisted Self-Service:

4.17 The pilot tested a new offer of self-service and assisted self-service. This provided a space that was open to residents all day. In addition, assisted self-service was open during Customer Service operating hours whilst a member a staff was on duty.

4.18 We found that there were challenges with the current configuration of digital self-service. The computers were in a separate area to where our customers with more complex needs were being supported. We have concluded that having both of these functions in the same space will provide an improved service and be more efficient for customers and staff.

Multi-service Hubs/CSC Offer:

4.19 The pilot was a valuable opportunity for staff from the libraries to work together to develop and learn new skills. In particular, library staff built their skills in assisting and supporting customers with digital needs. A review is now underway to build on this collaborative approach and improve the service that the library delivers.

4.20 The pilot demonstrated that having one dedicated digital area to support residents, rather than multiple areas provided by the Hubs, libraries and CSC, is better for residents. However, the pilot also highlighted the need to have some separation between customers using computers for different purposes. This includes those who may be coming to use a computer for work purposes and those needing digital support. We found that efficiency could be improved if the assisted support area was located nearer to where the Hubs and CSC operate. This would help ensure that customers receive the support they need, whilst allowing staff to better manage resources.

Additional findings:

4.21 Since the Council moved into the Civic Centre in 2013, there has been a problem with noise travelling between the ground and mezzanine floors. The pilot only highlighted these issues further. On the ground floor, the combination of concrete, tiles and glass means that sound carries easily. This is particularly an issue with sound from the Children's Library, as the current space is not enclosed.

4.22 The pilot also highlighted general accessibility issues with the library. These issues are negatively affecting wheelchair users, those with pushchairs and those with SEND and/or mental health challenges.

4.23 Overall, the pilot was a success and identified how services could operate in a new way to improve the customer experience. The new arrangements required

structural changes to a number of face-to-face roles. These took place in October 2022 to support the new offer.

4.24 Despite the successes, the pilot demonstrated that the current Civic Centre layout does not support the way in which our services operate. Instead, the building's layout is compromising the experience of our residents. A redesign of the space will therefore allow us to improve the efficiency of our services and better meet the needs of residents.

Redesign Objectives

4.25 In March 2022, CMT agreed for an architect to be commissioned to develop plans for redesigning the face-to-face spaces within the Civic Centre.

4.26 The objectives of this were to design a solution which: addressed the current challenges with the space, expanded the library and Hub offer, and maximised the utilisation of the space. In particular, the architects were tasks with looking at the space on the mezzanine floor which has seen a reduction in footfall. The architects were also asked to expand the CYP offer by identifying how the space could support contact meetings with children and young people.

4.27 Willmott Dixon Interiors (WDI) were procured under a framework to commission this work. They were tasked with designing more flexible, multi-use spaces to allow better overall utilisation of the space, and with creating additional private meeting spaces to address a lack of suitable private meeting spaces for specific client groups. There was a requirement to make the spaces accessible and safe for all users including staff, stakeholders and residents.

4.28 WDI were also tasked with developing a space on the first floor of the Civic Centre, where the former Melting Pot is located, that could be used by CYP. The intention was that this would enhance the offer that CYP currently provide by creating a suitable space for family contact meetings and visits.

4.29 Currently, high-risk contact sessions in CYP are managed in the first-floor family room. This space is not fit for purpose. Family contact visits are important sessions for parents and children who have been separated. The purpose of these sessions is, primarily, for children to spend time with their parent(/s) when they have been placed in care. Secondly, these sessions are supervised for the purpose of assessment, as generally the local authority have instigated care proceedings in respect of the children. In these cases, parents are assessed in relation to their ability to parent safely and consistently. Therefore, CYP need a space that is comfortable, child-friendly, has facilities for baby-changing and food preparation, and has appropriate storage for toys.

4.30 WDI have worked with stakeholders from across the Council, engaged with multiple accessibility user groups and drawn on feedback from residents to develop a design and feasibility report.

Further benefits

4.31 In addition to the benefits discussed in the introduction, the transformation of the Civic Centre's ground and mezzanine floors would achieve the following:

- Provide the opportunity to expand the Brent Hub offer for a growing population. This will help to ease pressure on the other Hubs in the borough.
- Make the Brent Hub within the Civic Centre more accessible.
- Create additional and expanded facilities, particularly to support residents with more complex enquires.
- Support the growing student and flexible worker population in Wembley Park through the provision of additional study and work spaces.
- Provide new classroom areas. These will support the extension of community key skills programmes including those delivered by Brent Start and other partners such as ESOL and core digital skills.
- Provide more space to meet and support young people with SEND. The creation of more flexible and multi-use spaces will provide an additional location for the SEND Post-16 information centre. In this space, there will be desks, IT equipment, pods and booths, as well as the potential to provide equipment demonstrations.
- Create an attractive gallery space, which will support more local creatives to exhibit their work.
- Provide integrated heritage display spaces at the Civic Centre. This will enable the delivery of heritage learning programmes for schools, which is currently only possible at Willesden Green and through loan boxes.
- Support community cohesion and connection, through the increase in heritage and gallery display space. This will support more positive interactions with the Council and develop the profile of the Civic Centre as a genuine cultural and community space.
- Provide a safe and inclusive environment for residents of all ages.

5.0 Financial Implications

5.1 The estimated cost of the works for the building redesign is £1.96m which will be funded by borrowing. The annual revenue cost to undertake these works is up to £242k per annum for a 10-year period. This amount would reduce if additional funding can be obtained from the Arts Council.

5.2 The re-design and building improvements proposed will enable savings within the Customer Services, Libraries, Arts and Heritage, and Revenue and debt budgets. These will be utilised to fund the revenue cost of undertaking the investment.

6.0 Legal Implications

6.1 As detailed at paragraph 3.6, the proposed project will be funded in part via borrowing. Under sections 1 of the Local Government Act 2003 the Council may borrow money for any purpose relevant to its functions or for the prudent management of its financial affairs. Such borrowing should be in accordance with the Prudential Code.

6.2 Officers are proposing to submit a bid to the National Lottery Heritage Fund to assist with funding the project as set out in paragraph 3.7. In accordance with paragraph 13 of Part 3 of the Constitution, the Leader has delegated various functions to Cabinet members to be exercised within their portfolio area and in consultation with the Leader. The functions include approval to the submission of bids for additional resources from government and other bodies in relation to their portfolio area, subject to financial regulations and any matching funding being identified at the time of bidding. Cabinet member approval is therefore be required for a bid to the National Lottery Heritage Fund to be submitted.

6.3 The proposed project is likely to require the procurement of a range of consultancy and construction services. These are likely to be classed as Very Low Value Contracts, Low Value Contracts and Medium Value Contracts, under Brent's Standing Orders.

6.4 Under paragraph 9.5 and 9.7 of Part 3 of the Constitution, approval to procure and award Very Low Value Contracts, Low Value Contracts and Medium Value Contracts is delegated to the relevant Corporate/Operational Director.

6.5 The estimated value of the works contract is such that it is below the threshold for application of the Public Contracts Regulations 2015 (PCR 2015). However, any consultancy contracts that exceed the relevant PCR 2015 threshold will need to be procured in accordance with the PCR 2015.

7.0 Equality Implications

7.1 The project outlined will have positive equality implications by helping to make the Civic Centre's public spaces accessible for a wider range of residents.

7.2 The project supports the enhancements of the library site and service, particularly by improving the offer for children, young people and students.

7.3 The project will support children, young people and families by creating an appropriate space for CYP contact visits and private meetings.

8.0 Consultation with Ward Members and Stakeholders

8.1 The Cabinet Member for Jobs, Economy & Citizen Experience has been engaged throughout the project and is supportive.

8.2 In addition, the Cabinet Member for Community Engagement, Equalities & Culture (responsible for the Library, Arts and Heritage service) is supportive of the proposals to improve the Library user experience and enhance the Arts and Heritage display area.

8.3 Members will be kept informed of developments throughout the lifetime of the work via member briefings.

9.0 Human Resources/Property Implications (if appropriate)

9.1 In terms of staffing, we intend that project management of the redesign will be delivered using existing staff in the Transformation and FM teams. External consultants and contractors will be used to deliver architectural and construction services

9.2 The work will take place in phases with specific areas closed off to the public. This will ensure that the works are carried out safely.

Report sign off:

Peter Gadsdon
Corporate Director of Resident Services

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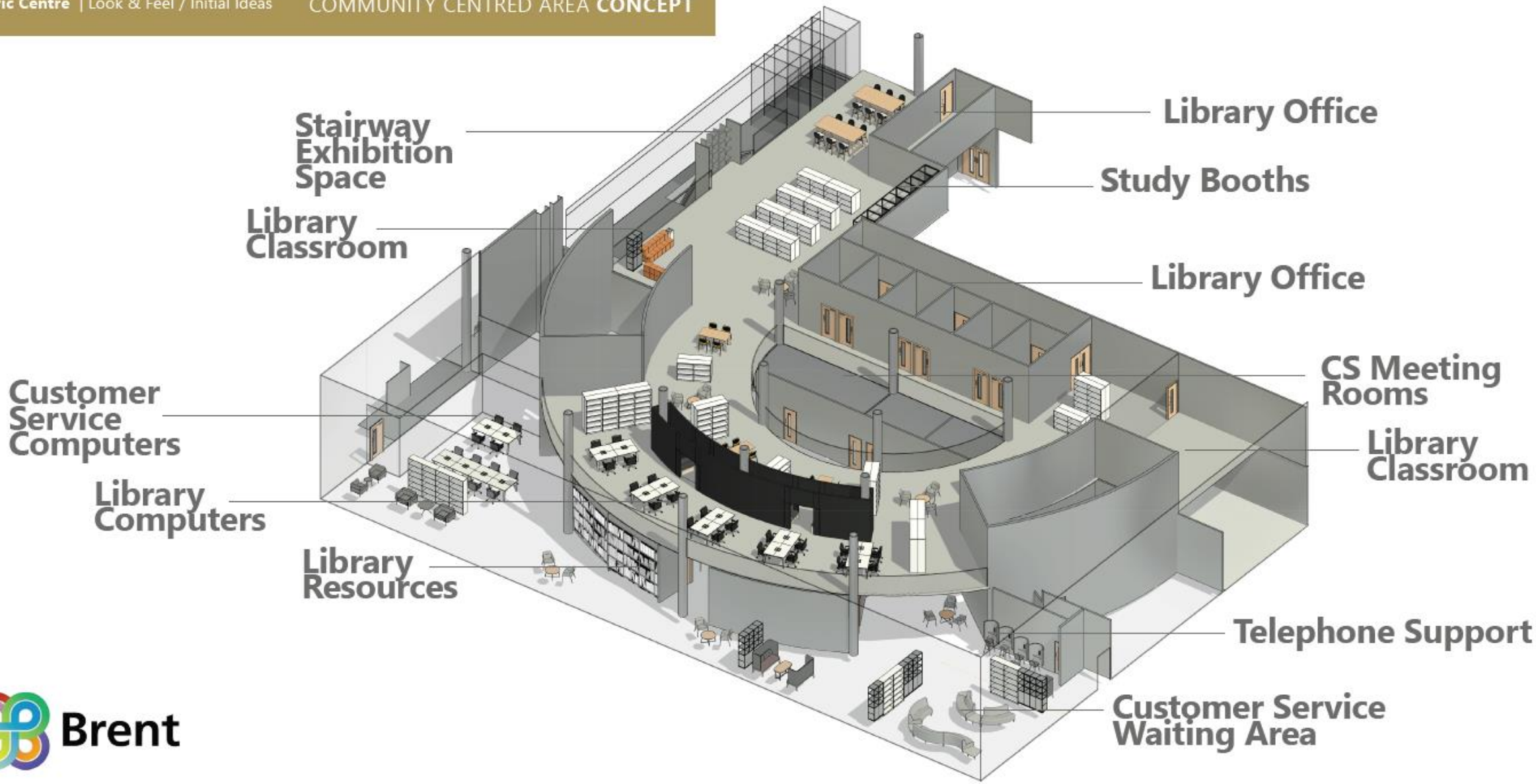
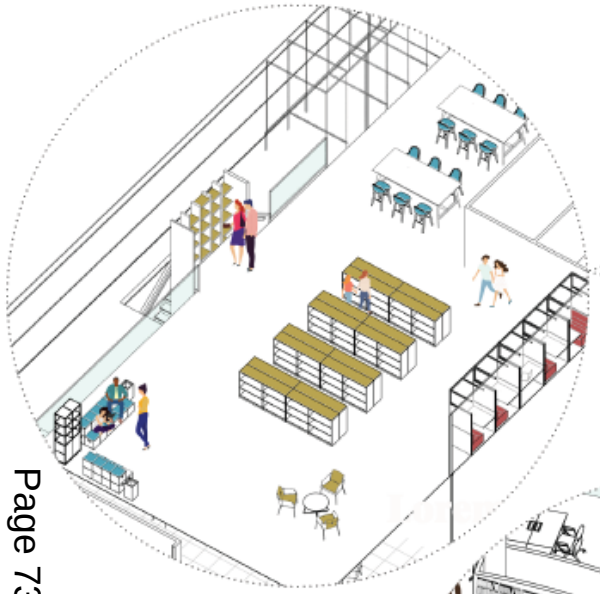
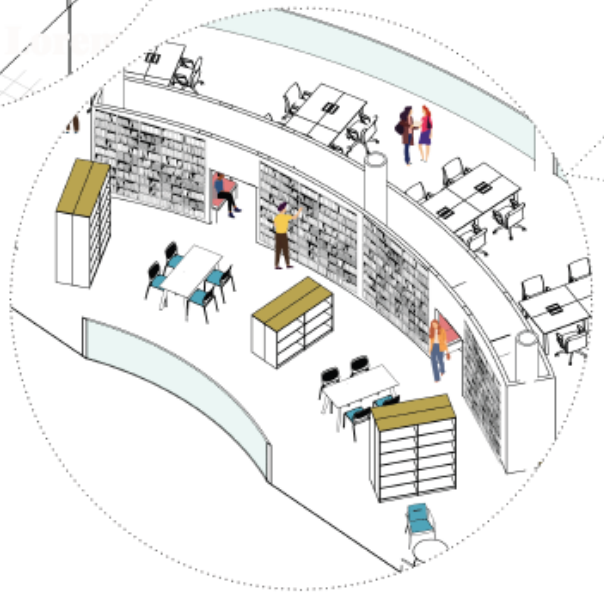
COMMUNITY CENTRED AREA **CONCEPT**

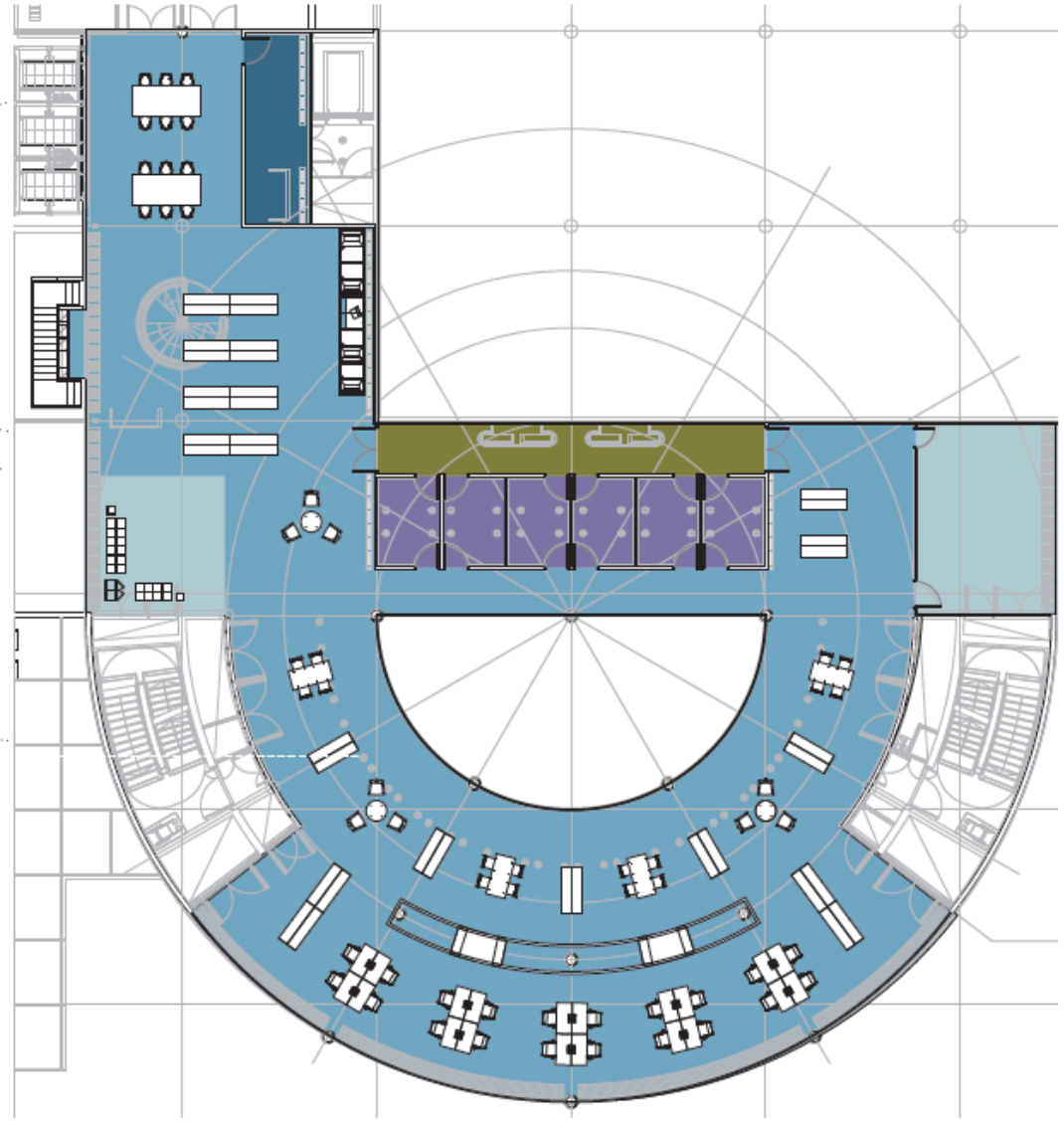


Brent

03 LIBRARY AREA **CONCEPT**

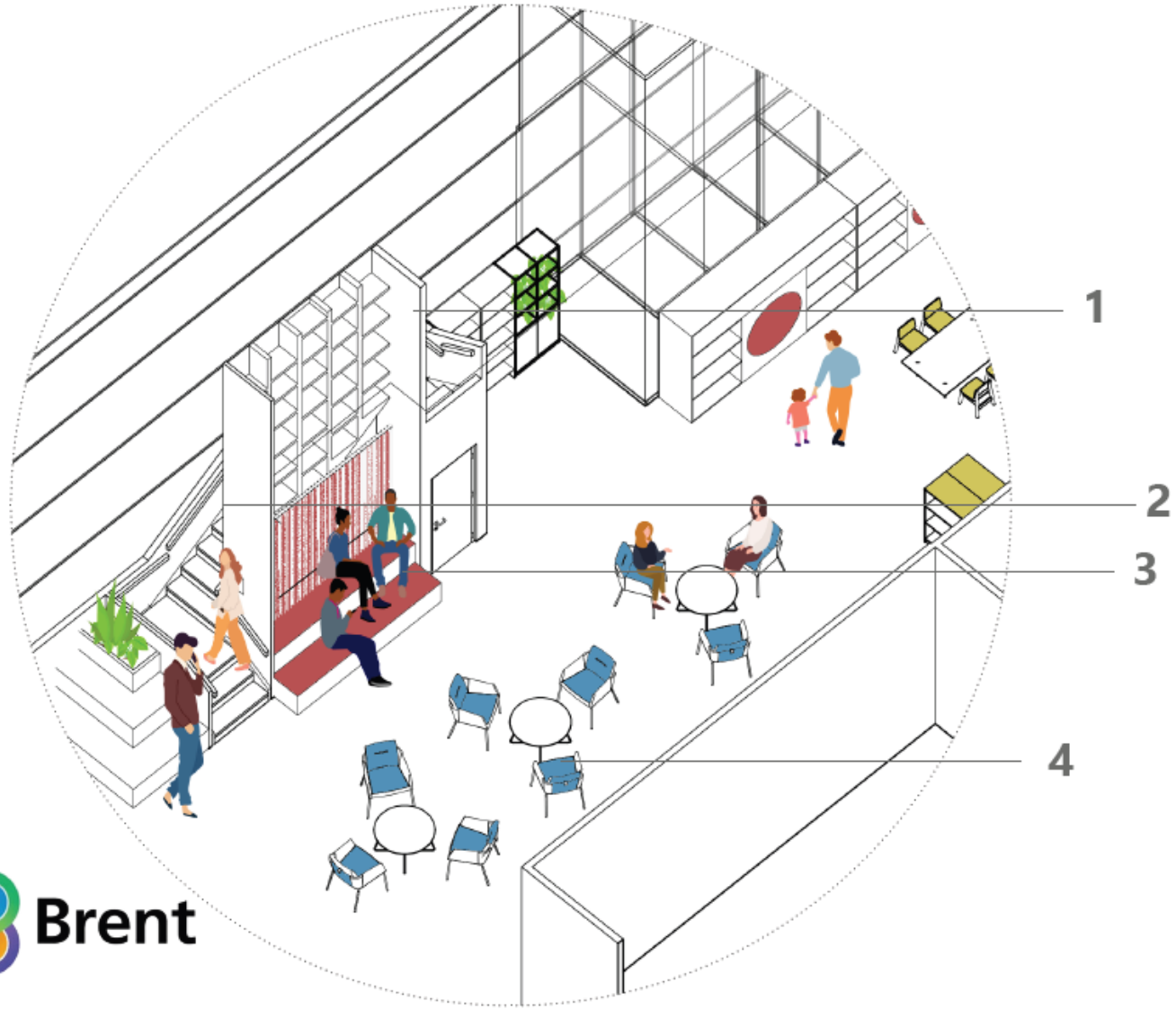






Brent

03 LIBRARY AREA **CONCEPT**



KEY

1 EXHIBIT WALL

Built-in exhibition wall to showcase heritage and library events, also a feature point of the Ground Floor Library to guide the community to the main part of the Library on the Mezzanine

2 STAIRS

New self supporting stairs leading up to the Mezzanine

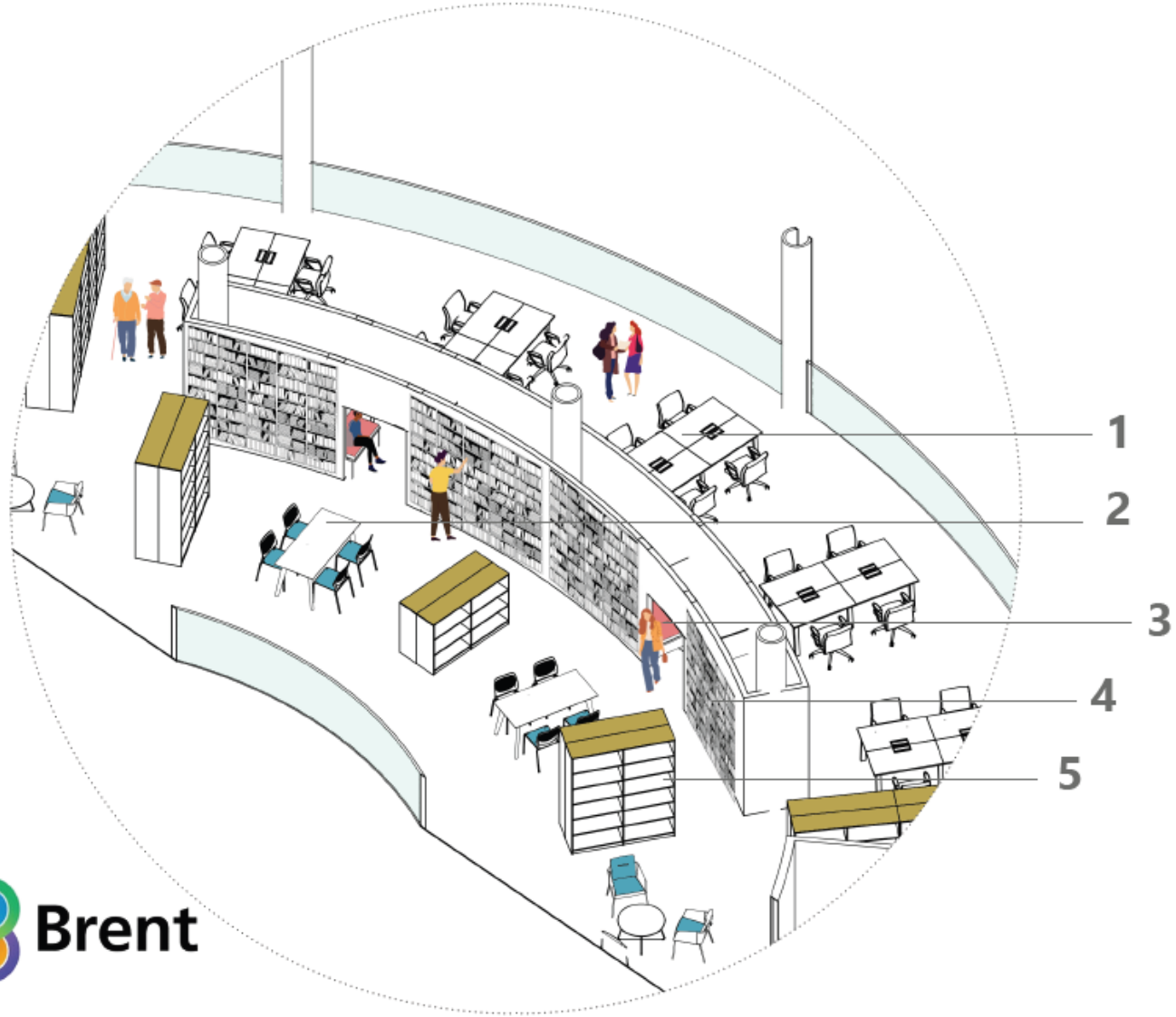
3 INTEGRATED SEATING

Seating and planting will provide the stairs with activity and energy, creating a focal point to guide the community to the Mezzanine

4 FLEXIBLE SEATING

Seating arrangements for collaboration space. Loose furniture and be reconfigured to suit the needs of the space

03 LIBRARY AREA **CONCEPT**



KEY

1 COMPUTER RESOURCES
Computer desks surround the curve of the mezzanine

2 COLLABORATION SEATING
Gives the opportunity to reconfigure the space, Areas for studying and collaboration

3 PASS-THROUGH BENCH SEATING
Pass-throughs have bench seating, lending to cozy areas to to read

4 BOOK WALL
Built-in book wall to provide ample storage for the Library's over 40,000 books. Pass-throughs lead to the computer resource area.

5 BOOKCASES
High-level bookcases provide areas of separation within collaboration areas

Optimisation

Stairs

STRATEGIES

01 Existing Stairs

The existing stairs have proven to be an accessibility problem. They can be difficult to navigate and in general, most people choose to avoid taking them and take the lift instead. To improve wellness, we propose the installation of a staircase that is engaging for the users.

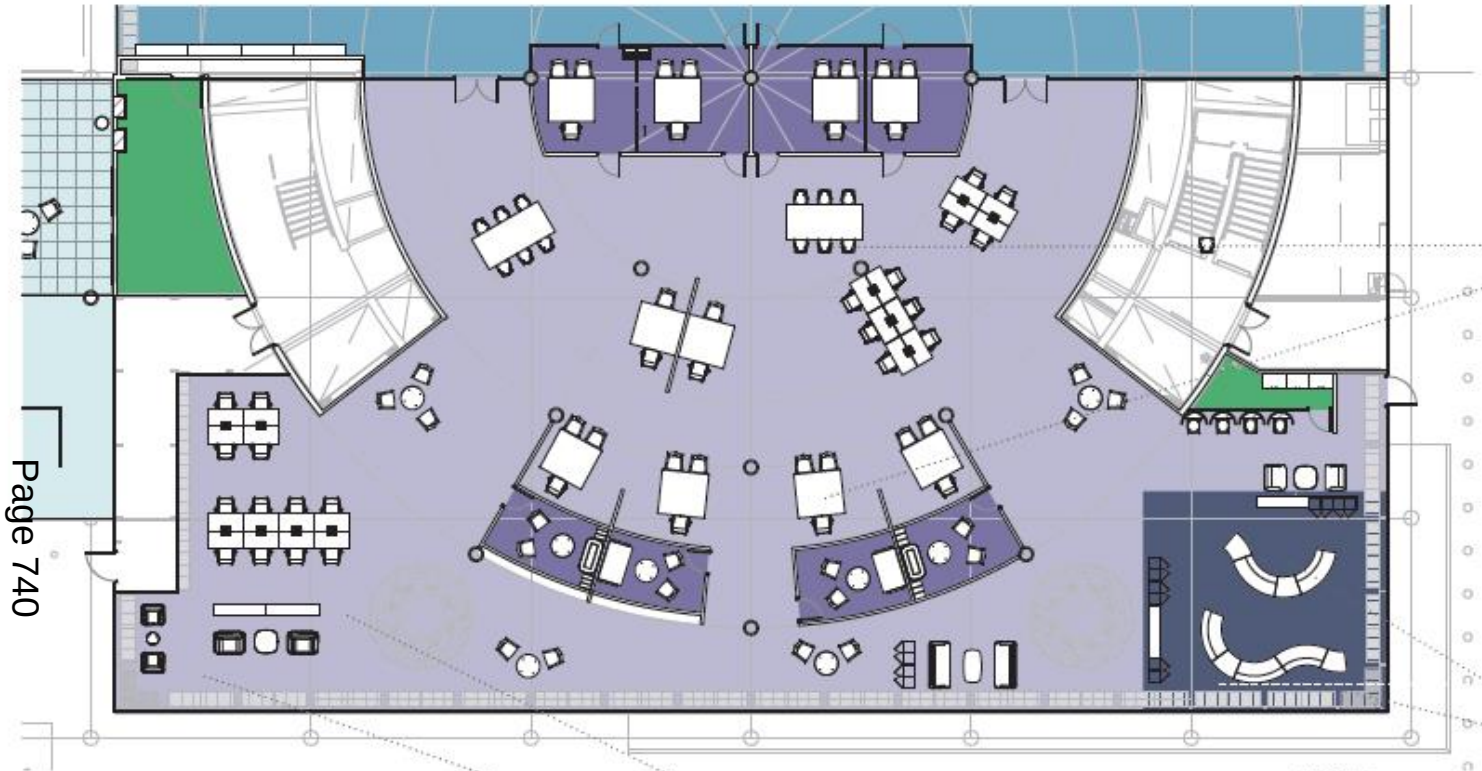
02 Seating integrated around the staircase

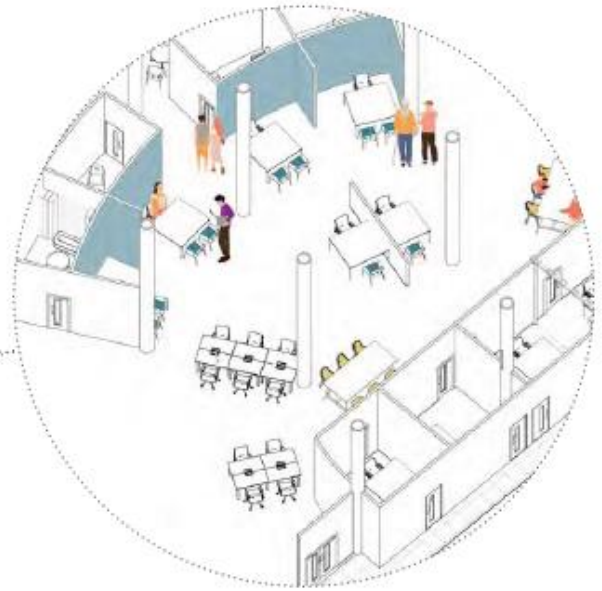
Creating a focal point around the staircase will attract users to choose the stairs over the lift. Adding in seating and integrating plants will provide the staircase with energy and activity and a sense of wellness. This creates a natural transition space within the Library's multi-functional strategy.

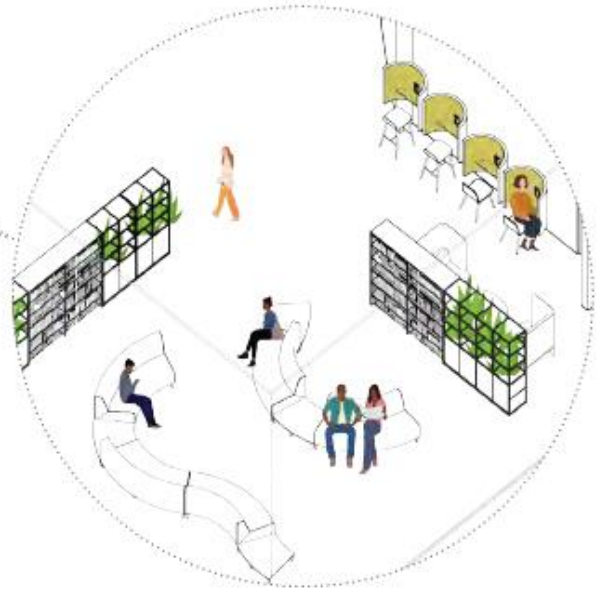
03 Draw users up the stairs

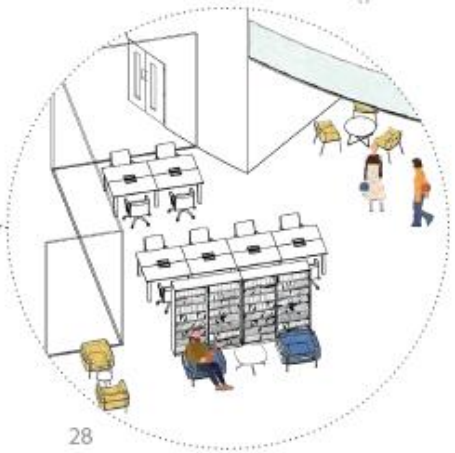
To increase the attraction to the Library spaces, we propose to attract users up the stairs by adding in feature walls, using digital technology or showcasing event signage or popular books. Integrated lighting can be used to highlight media on the feature wall.

02 CUSTOMER SERVICE AREA **CONCEPT**



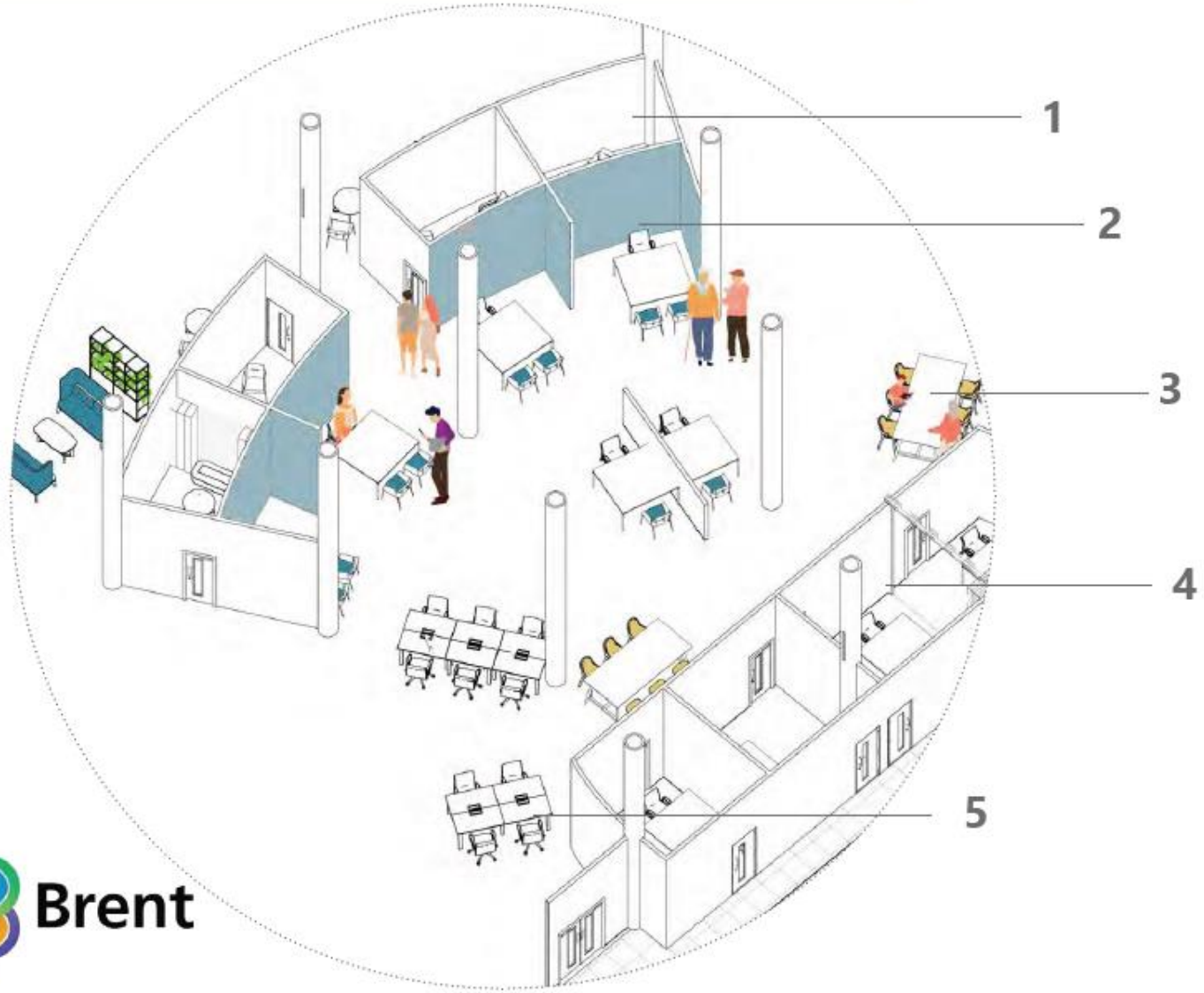






Brent

02 CUSTOMER SERVICE AREA **CONCEPT**



KEY

1 PRIVATE MEETING ROOMS
Comfortable and secure rooms, suitable for meetings and families awaiting resources

2 WORK STATIONS
Formal seating arrangements for staff to assist members of the community, set up to provide appropriate accommodations for staff, giving 1 meter safe distance

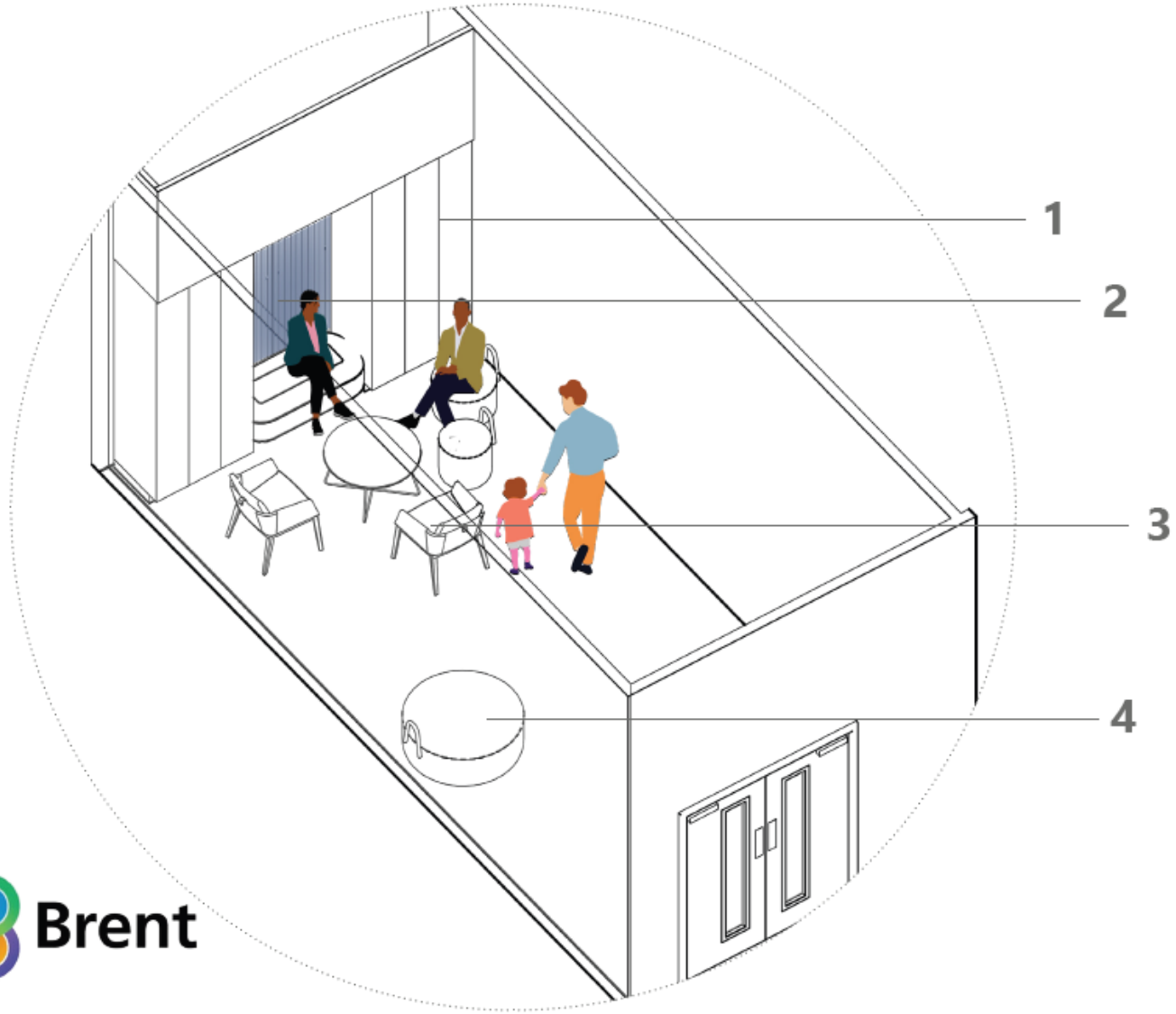
3 COLLABORATION AREAS
High Tables for appointments or for individuals to work

4 MEETING ROOMS
Meeting rooms with double entry / escape. Meeting rooms to be bookable. One meeting room with movable partition to create one large meeting room

5 COMPUTER DESKS
6 Computer Desks in close proximity to staff for customers who need additional support

Brent

05 FAMILY MEETING ROOMS **CONCEPT**



KEY

1 BUILT-IN STORAGE CABINETS
To store supplies + materials for meetings

2 ACOUSTIC PANEL
Wall panels in addition to absorbant ceiling finishes will ensure better room acoustic conditions and aide communication inside

3 SOFT SEATING
Allows for approachable configurations to support a safe and comforting space for difficult meetings

4 FLEXIBLE SEATING
Gives the opportunity to reconfigure the space depending on the needs of the meeting
Poufs are easily moved and varying sizes to give comfort to young people

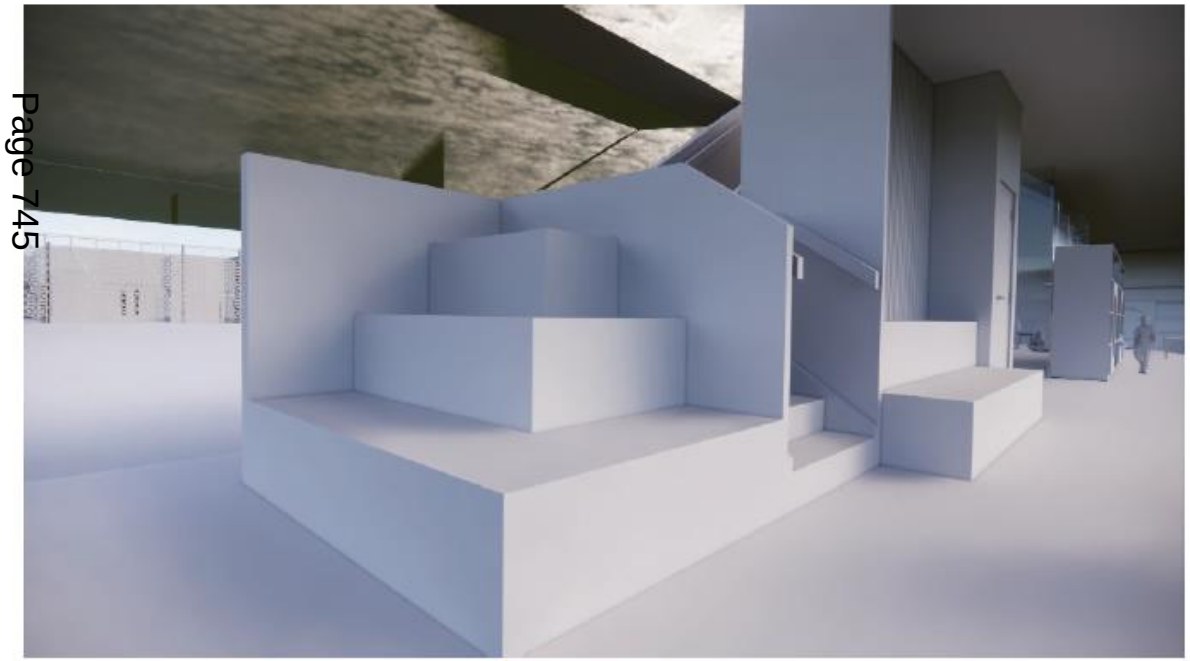
The following images are extracted our the initial desktop model used for space analysis.

We are not showing colours or textures at this stage, as the current purpose of this model is to synthesise the spacial, volumetric response to the Customer brief.

Further development and integration of buildability, colours and textures will happen on the next RIBA stages.

Customer Service Area Concept View

Customer Service Area Concept View



Library Area Concept View - Stairs

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Brent	**Cabinet** 6th February 2023
	Report from the Corporate Director for Resident Services

Council Tax Support Fund 2023/24

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	One Appendix 1: Council Tax: Discretionary Reduction Policy – Section 13A(1)(c) Local Government Finance Act 1992
Background Papers:	
Contact Officer(s):	Peter Cosgrove, Head of Revenue and Debt 020 8937 3453 Email: peter.cosgrove@brent.gov.uk Thomas Cattermole, Director of Customer Access 020 8937 5446 Email: Thomas.Cattermole@brent.gov.uk

1.0 Purpose of the Report

1.1 On 23 December 2022 the government announced funding and guidance for its Council Tax Support Fund for 2023/24. This allows the Council to reduce Council Tax bills by up to £25 for those in receipt of Council Tax Support (CTS) and to use remaining funding to further support households in need.

1.2 The Government has advised that the mechanism which should be used to make these reductions in Council Tax liability is by relying on section 13A(1)(c) of the Local Government Finance Act 1992 ("1992 Act"). Therefore, this report recommends an amendment to the Council's existing 13A(1)(c) policy as provided as appendix 1 to this report.

1.3 The government advice regarding the funded scheme for 2023/24 can be found here: Council Tax Support Fund guidance - GOV.UK (www.gov.uk)

1.4 This report sets out to:

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

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

2.0 Recommendation(s)

2.1 That Cabinet approves the proposed discretionary reduction Policy pursuant to section 13A(1)(c) of the Local Government Act 1992 as set out in appendix 1 to this report.

2.2 That Cabinet notes that the proposed Policy pursuant to section 13A(1)(c) of the Local Government Act 1992 links to council support for vulnerable residents alongside other support mechanisms such as Discretionary Housing Payments (DHP) and Resident Support Fund (Local Welfare Assistance).

2.3 That Cabinet delegates authority to the Corporate Director for Resident Services in consultation with the Corporate Director of Finance and Resources in respect of decisions on individual applications for reducing Council Tax payable pursuant to the proposed policy under section 13A(1)(c) of the Local Government Finance Act 1992 as set out in Appendix 1.

3.0 Detail

3.1 At the Council's Cabinet meeting of 20 July 2020 the exiting policy regarding decisions on reductions in council tax under section 13A(1)(c) of the 1992 Act were delegated to the then Director of Finance and Strategic Director, Customer and Digital Services.

3.2 The proposed policy amendment sets the way in which the Council's discretion to make council tax reductions under section 13A(1)(c) of the 1992 Act will be utilised in 2023/24 and in subsequent years. The policy:

i. properly makes the distinction between debt write-off of an uncollectable debt due to deceased, bankrupt, vacation of a property where there is typically no ongoing liability and a section 13A(1)(c) council tax reduction where the taxpayer has a continuing liability for the property.

ii. sets out how individual cases are dealt with on their merits and provides criteria to consider as:
   a) Fire and flood
   b) Domestic violence
   c) Losses due to theft
   d) Safeguarding
   e) The above list is not exhaustive and officers will use their discretion in reviewing applications.

iii. The policy sets out two classes of taxpayer as eligible:

a) Those in receipt of those in receipt of Council Tax Support who will be entitled to an award of up to £25 off their Council Tax for 2023/24 under the government's Council Tax Support fund. This will apply to all awards to CTS for the 2023/24 financial year. These reductions are made to qualifying Council Tax accounts without application. Those that have CTS included in their Council Tax bill to be issued in March 2023 will have the reduction of up to £25 included in their bill.;

b) That any excess funding provided to the Council and not used in iii. a) will be provided to the Council's Resident Support Fund from which vulnerable households are able claim support under 13A(1)(c).

c) Those Brent care leavers aged between 18 and 24 years old who are liable for council tax in the borough.

3.3 It is expected that in 2023/24 reductions under this policy will benefit around 15,000 households.

4.0 Financial Implications

4.1 The cost of the Council Tax Support Fund is funded by the central government grant of £722,279.

4.2 The cost of supporting care leavers in 2020/21 is estimated at £80,000.

4.3 The cost of providing 13A(1)(c) reductions through the Residents Support Fund ("RSF") is expected to be around £600,000. This is funded through the RSF budget.

4.4 Ad hoc 13A(1)(c) awards made through the Council Tax team are expected to increase in demand during 2023/24. It is estimated that total awards will not exceed £100,000.

5.0 Legal Implications

5.1 The Council Tax Support Fund 2023-2024 Local Authority Guidance ("the Guidance") sets out the grant provisions for those Local Council Tax Support recipients.

5.2 This proposed policy regarding discretionary relief in respect of council tax liability under section 13A(1)(c) of the 1992 Act, which comes within the competence of the Cabinet as an executive function, is separate from the Council's powers to reduce council tax liability under the Council's Council Tax Support scheme under section 13A(1)(a) and 13A(2) of the 1992 Act. A Council Tax Reduction Scheme (also known as a Council Tax Support Scheme) has to be amended by Full Council.

5.3 The Council's power and discretion to make reductions in council tax liability under section 13A(1)(c) of the 1992 Act (i) includes the power to reduce the council tax liability to nil (cf. section 13A(1)(6) of the 1992 Act); and (ii) may be exercised in relation to particular cases or by determining a class of case in

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

5.4 The Council proposed to amend amended its section 13A(1)(c) policy in order to accommodation the additional funding for Council Tax Support that will be provided by the government (which was announced on 23 December 2022) and this is one reason why consultation on the amended proposed section 13(1)(c) policy has not taken place. The second reason for not carrying out consultation is because there is insufficient time to do so as the proposed section 13(1)(c) policy and changes arising from the government's additional council tax support funding will need to be incorporated into Council tax bills in advance of the next financial year. As stated above, the additional funding and guidance provided by the government was not announced until 23 December 2022.

5.5 The Government's guidance dated 23 December 2022 also sets out monitoring and reporting requirements for local authorities which will include liaising with the Department for Levelling Up, Housing and Communities to monitor implementation progress. The government's guidance dated 23 December 2022 includes the following advice:

- Councils will want to consider using a proportion of their allocation to establish their own local approach to helping economically vulnerable households with council tax bills;
- Local authorities should revisit their discretionary approach at intervals during the financial year, in order to ensure expenditure for 2023-24 remains within their allocation.

6.0 Equality Implications

6.1 The public sector equality duty requires public bodies to pay due regard to the need to:-

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010;
- advance equality of opportunity between people who share a protected characteristic and those who do not;
- foster good relations between people who share a protected characteristic and those who do not.

6.2 The Equality Act 2010 and the Public Sector Equality Duty (outlined above) cover the following nine protected characteristics: age, disability, marriage and civil partnership, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation.

6.3 A new and revised LCTS scheme went live for those of working age on 1 April 2020. The scheme provides financial assistance for Council Tax payers who are financially vulnerable and require assistance to meet their Council Tax liability. LCTS for those of working age is calculated on the claimant's net CTAX liability after the granting of any other Council Tax discounts (e.g. Single Person Discount). The policy here provides an extra safety net as allowed by the legislation. It is expected to benefit around fifteen thousand households in 2023/24.

7.0 Consultation with Ward Members and Stakeholders

7.1 None, due to the short timescale between the government announcement on 23 December 2022 and the following financial year and for reasons set out in paragraph 5.4 of this report.

8.0 Human Resources/Property Implications (if appropriate)

8.1 None

Report sign off:

Peter Gadsdon
Corporate Director Resident Services

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Appendix 1

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

1. Background

Section 13A(1)(c) of the Local Government Finance Act 1992[1] ["13A(1)(c)"] as amended provides powers to the Council to reduce the amount of council tax payable for an individual or class of persons.

13A(1)(c) may be used for individual cases or the council may determine classes of case for which liability may be reduced.

The authority to make these awards is delegated to the Corporate Director of Customer and Digital Services in consultation with (?) the Corporate Director of Finance and Resources.

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

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

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

2. How to claim a discretionary reduction

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

It must be made in writing by the taxpayer or by someone authorised to act on their behalf to the principal council tax office and titled "Section 13A(1)(c) Application". Information is provided on the Council's website for this purpose: Help paying your Council Tax | Brent Council

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[1] 13A Reductions by billing authority

(1) The amount of council tax which a person is liable to pay in respect of any chargeable dwelling and any day (as determined in accordance with sections 10 to 13)—

…

(c) in any case, may be reduced to such extent (or, if the amount has been reduced under paragraph (a) or (b), such further extent) as the billing authority for the area in which the dwelling is situated thinks fit.

…

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

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

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

3. Discretionary Relief Policy

3.1. Individual cases

The Council considers all claims for relief and considers them on the particular circumstances of the council taxpayer. However, some or all of the following criteria shall be met for each case:

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

3.2. Classes of reduction

3.2.1. Council Tax Support Fund 2023/24 only

This section (3.2.1) applies only to the financial year 2023/24 and payments made in that year. No application is required where the council tax account holder is in receipt of CTS and has an amount to pay after CTS has been applied. These hardship payments are made as a reduction to council tax liability in accordance with government guidance and they shall not exceed £25 per council tax account holder. The government has allocated the Council the sum of £722,000 for this purpose. The guidance allows for the Council to use any remaining funding to further its own approach to supporting economically vulnerable households with council tax bills. The Council will do this by making 13A(1)(c) awards following successful applications to the Council's Resident Support Fund.

3.2.2. Care Leavers

A discretionary relief is awarded to Brent care leavers aged between 18 and 24 years old who are liable for council tax in the borough. To be eligible the care leaver must be liable for council tax and have previously been in the care of Brent Council. Brent care leavers resident outside the borough, or care leavers resident in Brent who have left another authority's care, are not eligible. The amount of relief is applied after all other discounts have been awarded and there is an amount to pay. If a care leaver is already in receipt of an exemption no relief is awarded. However, should that exemption end the care leaver would then be entitled to care leaver relief if they remain liable for council tax. The relief is awarded up until the end of the current financial year or on the care leaver's 25th birthday, whichever is earliest. Eligible care leavers are identified by the Council and relief is awarded automatically with no application needed. However, any care leaver who believes they qualify but have not received any relief should contact the council tax team. Section 13A (1)(c) of the Local Government Finance Act 1992 allows the Council to reduce the amount payable, but not to amend who is named on the bill. The relief is applied to the council tax account and as a result, relief would still be applied where a care leaver and a non-care leaver are jointly liable for the council tax bill.

4. Amount of relief

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

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

5. Decision

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

6. Appeal

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

i. The Council will not allow an appeal
ii. The applicant is not satisfied with the steps your local authority is taking to resolve your grievance
iii. No decision to the appeal has been given and it has been more than two months

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

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

Brent	**Cabinet** 6th February 2023
	Report from Corporate Director, Resident Services

New Repayment Framework for Major Works billing for Leaseholders in Brent

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	Four Appendix 1: Current and proposed leaseholder repayment options Appendix 2: Benchmarking Appendix 3: Getting to know you and your home survey
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Hakeem Osinaike Director of Housing 020 8937 2023 Hakeem.Osinaike@brent.gov.uk Kate Daine Head of Housing and Neighbourhoods 020 8937 5440 Kate.Daine@brent.gov.uk

1.0 Purpose of the Report

1.1 Brent Council is freeholder / landlord to 3850 leaseholders. With an average of 30 Council tenants invoking the Right to Buy each year, this number will continue to steadily rise.

1.2 This report is to provide Cabinet with an overview of recent changes in legislation relating to leasehold management and to advise on what these mean for leaseholders in Brent.

1.3 This report also presents Cabinet with both new and improved existing offers for leaseholders when they receive service charges/major works bills from the

Council. These will increase repayment options and flexibility, and market the current option to Buy Back leasehold homes. The improved options respond to the current economic landscape, particularly as we commence major refurbishment of our high-rise blocks and will bring Brent's offer in line (or ahead of), other Local Authorities (Appendices 1&2).

1.4 This paper also outlines additional service improvements.

2.0 Recommendations

2.1 That Cabinet agree the following:

2.1.1 To extend the interest free periods in respect of major works for resident leaseholders from 2 years (currently) to 5 years.

2.1.2 The repayment offer as set out in 8.0

2.1.3 To promote the option to all resident leaseholders (in those blocks scheduled for major works as set out in 5.1) for the Council to 'Buy Back' their home at market value (reduced to 75% of market value, if they choose to become secure tenants), and for non-resident leaseholders of those same blocks to have the option for the Council to buy back their leasehold property at 100% of the market value.

3.0 Context

3.1 There are two types of home ownership in the United Kingdom, the first is freehold which means an individual/ organisation owns a building and the land it sits on outright. The second form of ownership (which also applies to products such as shared ownership) is leasehold. Leasehold is where an agreement i.e. a lease, sets out a fixed period that an individual/ organisation will own a property for.

3.2 However, a leaseholder does not own the building structure nor the land; this remains under the ownership of the freeholder. The Lease Agreement sets out the legal rights and responsibilities between a leaseholder and a freeholder, including the financial contributions leaseholders are required to pay a freeholder.

3.3 Brent Council's charges to its leaseholders fall under two categories. The first is known as a service charge. Service charges are calculated on an annual basis and usually paid for in monthly instalments and cover the cost of day-to-day services required for the management and upkeep of the building and land. This may include small scale communal repairs, cleaning services, concierge and grounds maintenance. An example of a service charge would be caretaking services in Council owned blocks, where a leaseholder is charged £116.68 per year, including BHM Management fees.

3.4 The second category is known as 'Major Works' or sometimes 'Qualifying Works'. 'Qualifying Works' for the purposes of the Landlord and Tenant Act

1985 (as amended) (requiring s20 consultation in accordance with the 2003 Regulations) are major works amounting to more than £250.00 per leaseholder and this is a one off charge. Major works charges a leaseholder is required to contribute towards are typically for large repairs and maintenance works to the fabric of the building such as roof replacement, window replacements, brick or concrete repairs, redecoration, lift replacement and boiler works.

3.5 For any major works amounting to more than £250.00 per leaseholder, a Landlord is legally required to carry out consultation through a process prescribed under s.20 of the Landlord and Tenant Act 1985 (as amended), and the Service Charges (Consultation Requirements) (England) Regulations 2003 (commonly referred to as 'Section 20' consultation). There are time limits stipulated in the regulations which need to be followed. This includes issuing a Notice of Intention to carry out works (commonly referred to as a Section 20 Notice) which includes the following information:

3.5.1 A description of the proposed works

3.5.2 Reasons for the works

3.5.3 Estimated cost of the works

3.5.4 Details for how a leaseholder can submit their comments (also known as observations)

3.5.5 The deadline for submitting observations

3.6 Landlords are then required to respond to any observations received before works can commence.

3.7 The above demonstrates that the relationship between leaseholders and freeholders/landlords is largely a financial exchange and therefore the main driver of satisfaction among leaseholders is a perception of good value for money for service charges and major works costs.

3.8 The Housing Revenue Account (HRA) and funds in it determine the future capital works that the Council can deliver. Council tenants are charged service charges in line with their tenancy agreement terms, and their rent is invested in improving Council housing for tenants, and this is considered to include major works.

3.9 Leaseholders receive service charge demands (charged in line with the terms of their lease) for major works as well as general services such as cleaning or grounds maintenance.

3.10 Leaseholders are charged their full share towards the costs of all works and services (including major works) and the HRA does not provide any subsidy. The costs of major works and services must therefore be reasonable and reasonably incurred. The collection of these costs and the payment terms, which the Council offers, must consider the affordability to the leaseholder, with

a view to helping minimise the risk of leaseholders accruing debts that they are unable to pay.

3.11 Our aim is to provide a new repayment structure which is fair; minimises the risk of bad debts; improves the ability of resident leaseholders to make payments and sustain their leasehold residency, while balancing the need to recover charges as efficiently as possible.

4.0 Legislative changes

4.1 From 28 June 2022, the leaseholder protections on building safety costs in England have come into effect. For the purpose of this report, it should be noted that the term 'qualifying leaseholder' refers to a leaseholder who owns a property in a building above 11 metres (or 5 storeys) and on 14 February 2022:

4.1.1 The property was their main home, or

4.1.2 They owned no more than three UK residential properties in total.

4.2 Following the tragedy at Grenfell Tower, a national debate started between Government, Building Owners and leaseholders on who is responsible for paying for fire safety costs, particularly if a building had been clad in aluminium composite material (ACM). The Building Safety Act 2022 ("the Act"), which came into effect in June 2022 has solidified the Government's position on this debate, introducing new financial protections for qualifying leaseholders.

4.3 The aim of the Act is to ensure those who built defective buildings cover the costs for remediation works. Under the Building Safety Act 2022, qualifying leaseholders are exempt from being charged for the remediation of any cladding system. In addition, any costs to rectify historical building defects have been firmly capped for buildings above 11 metres or five storeys with historical safety defects.

4.4 In addition the Leasehold Reform (Ground Rent) Act 2022 became law on 30th June 2022. This prohibits ground rent payments on new residential long leases, i.e. leases for over 21 years, and this Act has abolished ground rent payments on informal lease extensions.

5.0 Major works repayment for leaseholders - reasoning for change

5.1 Brent has an ambitious plan to refurbish all of our tower blocks that are being retained i.e. not identified for demolition. This is likely to cost approximately £40M over the next three years. The blocks are Kilburn Square, Lodge Court, Manor Court and Windmill Court.

5.2 These blocks were built in the late 1960's and whilst they have had repairs and some minor refurbishment undertaken over the last 60 years, the major elements in the blocks have now passed their useful life and require either replacement or major refurbishment, if they are to continue providing good quality housing for residents.

5.3 The proposed specification is comprehensive and includes repairs to the building fabric; new energy efficient cladding; new windows; roofing; upgraded heating; upgraded mechanical and electrical services; internal refurbishment of the dwellings; and refurbishment of the internal communal areas.

5.4 These works will ensure that the blocks have at least another 40 years life and that they offer good quality modern accommodation to residents.

5.5 It is acknowledged that some leaseholders are likely to face substantial major works invoices and are due to be billed significant costs with proposed works on the above estates, and other estates where similar works will be required in the future.

5.6 A review will need to be carried out prior to any charges being issued to leaseholders, as to what degree of the works can be recovered under the leases – typically this is anything which can be argued to amount to a 'repair' and nothing more.

5.7 The current financial situation, as a result of the cost of living crisis, emphasises the need for the Council to recognise that more leaseholders may find it difficult to pay their bills. This has prompted officers to consider if the current repayment options make it viable for resident leaseholders to be able to pay their major works bills with minimal risk of mounting debt or the need to consider alternative options.

5.8 The Council needs to ensure that repayment options are affordable, sustainable and minimise hardship for leaseholders; enabling them to agree repayment terms that are manageable.

5.9 Officers must collect payments in an efficient manner in order to protect the Housing Revenue Account. The need to collect debts must be balanced with reducing the risk of the Council incurring outstanding amounts that go unpaid because they are unaffordable, or of lengthy and costly court proceedings to recover the debt, which jeopardises future capital works.

5.10 It is important to note that this report proposes to differentiate between resident leaseholders who live in their homes, and non-resident leaseholders who collect an income from subletting. Non-resident leaseholders are landlords and subletting is considered a business. The Housing Revenue Account should not be used to fund non-resident leaseholders' businesses and as such, the proposed changes outlined are to benefit resident leaseholders first and foremost. Non-resident leaseholders are already given some allowance in that they are offered 24 month repayment plans. In the context of the cost of living crisis, there is an enhanced need to protect both resident leaseholders and the Housing Revenue Account.

5.11 In the blocks where significant major works are due to take place at present there are:

- 63 leaseholders in total
- 23 of these are resident leaseholders.
- There are currently 6 pending Right To Buy applications for these blocks- all of whom will be advised of the works and prospective bills ahead of purchase

It has not been possible to establish if the current leaseholders have any vulnerabilities related to age or health. However, work will commence following the decisions made by Cabinet to reach out to impacted leaseholders and discuss their options with them, offering them support.

5.12 These terms are applied at the Council's discretion and outside the terms of the lease, which otherwise would require immediate settlement of outstanding major works charges.

6.0 The current offer

6.1 At present Brent Council offers no distinction between resident leaseholders and non-resident leaseholders when considering re-payment options

6.2 Brent currently has first refusal on most leases where a leaseholder wishes to sell their home. In instances where Brent does not have first refusal it is made clear to leaseholders who wish to sell that Brent will always be interested in buying back their home, if funding is available through the HRA. In this process the leaseholder will have the option to potentially surrender the lease and revert to being a secure tenant of the property instead, with a sale back to Brent at 75% of the value, or will sell the property for 100% of the value and will move out of the home and make their own housing arrangements.

6.3 Additionally, Brent offers buyback services through Investment for Brent (i4B holdings), but only if certain requirements are met, and this option is currently on hold until further notice. There is no possibility for the leaseholder to become a secure tenant if the property is purchased through i4B because it is dealt with as a private sale.

6.4 A 5% discount on the total bill is awarded if full payment is received within 28 days of the date of the invoice.

6.5 An interest free offer is available to both resident and non-resident leaseholders for up to 24 months.

6.6 If the leaseholder cannot repay the cost within the given timeframe (1 or 2 years) there continues to be a statutory loan option for both resident and non-resident leaseholders for repayments to take place for up to 10 years- with interest of 5.05% from the start. This can only be taken out with mortgage approval as it is secured with a charge against the property.

6.7 A charging order protects a debt owed to the Council by a leaseholder, by securing the debt against their property. This means that if the leaseholder sells or re-mortgages their home before the debt is paid off, the charging order will be paid off with the proceeds.

7.0 Benchmarking

7.1 Officers benchmarked with 13 other Local Authorities (see Appendix 2), noting most had updated their payment options in recent years, often to also take account of higher invoice values.

7.2 Officers set out to establish specifically the length of payment terms other Local Authorities offered to both resident and non-resident leaseholders, and where applicable, the interest rate they charged.

7.3 Both resident and non-resident leaseholders in Brent currently have less favourable options when compared to the 13 councils benchmarked against.

7.4 A range of additional options to those Brent currently offer were found at other councils.

7.5 These included the following:

7.5.1 Deferred payments

7.5.2 Voluntary charges

7.5.3 Buy-backs for residents who will remain in the property as a secure tenant

7.5.4 An equity share scheme

7.5.5 Longer repayment options

7.5.6 Increased interest free periods

7.6 The most generous framework was Haringey, followed by Camden and Kensington and Chelsea Councils, the highlights of their offers are below (taken from Appendix 2):

Haringey	0% interest >15 years on bills +£60k	Repayment >25 years (+ interest on year 15-25)	
Camden	Defer repayment up to 1 year for bills +£10k	Repayment >25 years (+ interest on all years)	Buy back scheme: lessee becomes secure tenant

K&C	0% interest >10 years on bills +£40K	Repayment >20 years (+ interest on all years)	

8.0 Proposal/ New offer

8.1 Please see Appendix 1 for the financial proposal in table format.

8.2 Currently the offer is available that properties of leaseholders can be bought back by the Council or i4B where funds allow.

8.3 The new offer will take this further in recognition of the potential financial strain that leaseholders may face. Officers propose to offer any leaseholder living in blocks where major works are scheduled and large bills ~~are~~ may be due (Kilburn Square, Lodge Court, Manor Court and Windmill Court), the opportunity to sell their home back to the Council if they are concerned with affordability of the scheduled works. This offer will be proactively made available to leaseholders through marketing, and direct contact with them.

8.4 Resident leaseholders who wish to sell will have two options - to either; surrender the lease and revert to being a secure tenant of that same property instead, with a sale back to Brent at 75% of the market value; or will sell the property for 100% of the market value back to the Council and will move out of the home and make their own housing arrangements.

8.5 The reasoning for the 75% of the value sale for those leaseholders who wish to return to being secure tenants is that those secure tenants would still be able to invoke the Right to Buy again in future should they choose, and still have access to a discount. Additionally as a secure tenant the resident would have access to subsidised rents (35% of the market value of private rents), and would receive the improved access to services that social tenants enjoy- such as repairs, maintenance, improvements and housing management support.

8.6 Further proposed changes are as follows:

8.6.1 The interest free period for resident leaseholders be increased from 2 years to 5 years for major work bills.

8.6.2 Resident leaseholders (those who reside in their property, and it is their only home) are offered an increased repayment period of up to 10 years for all major works bills up to £39,999 (interest free for 5 years, and interest bearing for years 6-10).

8.6.3 Resident leaseholders are offered an increased repayment period of up to 20 years for major works bills of £40,000 and over (interest free for 10 years and interest bearing for years 11-20).

8.6.4 A discount of 5% is offered to all leaseholders who pay in full within 12 months for invoices over £1000.

8.7 This will allow time for resident leaseholders to raise finances for higher value bills. Officers have confidence that the changes may further stimulate some resident and portfolio landlords to pay in full at the outset rather than setting up payment plans.

8.8 From benchmarking, it is clear that the above offer would make Brent very competitive when compared with other London boroughs. It would be a demonstrable commitment to resident leaseholders that the Council recognises and values them and ensure that Brent is reacting to the Cost of Living crisis and is supporting those resident leaseholders who may be more vulnerable and less able to make payments.

8.9 The changes proposed in this report will ensure that the Council's payment terms are brought up to date and reflect the best payment options available for our resident leaseholders. The aim is to ensure that resident leaseholders are able to sustain their homes and manage their finances while benefitting from necessary improvement works which will see their homes increase in value, energy efficiency and modernisation.

9.0 Service improvements for our leaseholders

9.1 In recognition of the need to improve and progress the service offer to leaseholders, officers have implemented the following:

9.1.1 Using STAR (customer satisfaction survey) recommendations to improve and review the offer for leaseholders.

9.1.2 The employment of a dedicated Home Ownership manager who oversees all aspects of charges, communications, leasehold management, lease extensions and the Right to Buy.

9.1.3 The creation of a Home Ownership Panel. This is a dedicated platform for leaseholders to influence service delivery and provide direct feedback on our services, helping to shape future decisions and improve leaseholder choice and autonomy.

9.1.4 The upcoming roll out of the Tenant Satisfaction Measures to our leaseholders. The Social Housing Regulator will soon require that Council tenants' satisfaction with their landlord is measured using a national framework. There is no requirement from the Regulator to collect the same data for leaseholders. However, we are committed to tracking and understanding the relationship between BHM and leaseholders, in order to continually improve.

9.1.5 A specialised signposting service for support; recognising that leaseholders may fall in the cohort of households not used to asking for help, knowing where to find it or what is available.

9.1.6 Strengthening through the continuous review of systems relating to leaseholders, how the home ownership team works with other services,

and advocating the need to be able to evidence value for money. Officers recognise that this drives satisfaction for leaseholders.

10.0 Consultation and engagement

10.1 The below chart details the number of leaseholders who own properties in the estates likely to be impacted by the higher bills for major works.

Accommodation	Total LH	Resident LH	Pending Right To Buy applications
Manor Court	6	None	2
Lodge Court	7	None	1
Windmill Court	33	15	2
Kilburn Square	17	8	1

10.2 From September 2020 consultation of the proposed works at Kilburn Square has been underway. Four residents meetings have taken place to date and have been attended by the Lead Member. Additionally to this every resident in Kilburn Square, including resident leaseholders or their tenants, have been visited. A survey was carried out (Appendix 3) with them to do a household audit, establish if they had any vulnerabilities, and whether or not they will be able to remain in situ for the duration of the works. A management plan was created for each household, to ensure minimal disruption, that residents were fully supported and also that they had a detailed understanding of the works due to take place.

10.3 To date around 95% of residents at Kilburn Square have been visited as above, with only a small number of households not yet engaging. Kilburn Square is the first of four blocks where significant works are due to take place, and the consultation that has been described above will take place at the other three estates in due course. Officers will ensure that leaseholders are kept fully informed.

10.4 Consultation with leaseholders on the proposed new repayment options was carried out over a 6-week period between May – June 2022 to provide comments and further suggestions in relation to the proposed changes to the payment policy. Unfortunately, there was no response.

10.5 However, a Home Owners Panel was set up and the initial meeting was used to discuss the proposed changes.

10.6 Core membership of the Panel is open to all residents who are Brent Council leaseholders (both resident and non-resident leaseholders), who have not breached any lease obligation in the last two years

10.7 On September 27, 2022, the Home Owners Panel was presented with the proposal. Feedback was gathered as well as any suggestions regarding the improvements to the repayment policy.

10.8 The panel of leaseholders stated they wanted the options to be fair and provide sufficient time to pay without causing hardship to residents.

10.9 Most panel members agreed with the proposals, some non-resident leaseholders questioned why the changes did not all also apply to them. It was explained that they were considered businesses by virtue of their landlord status.

10.10 The Home Owners Panel will be meeting again by the end of this month to discuss the outcome of this paper.

11.0 Financial implications

11.1 Major works to improve council owned blocks are funded through the Housing Revenue Account (HRA). Leaseholder contributions towards repairs and services are essential funding sources to help balance budgets in the HRA, currently budgeted at £1.2m for 2022/23.

11.2 Offering flexible payment options to leaseholders is expected to reduce the likelihood of non-payment, as it will assist leaseholders to manage debt by spreading out payment plans over a longer period compared to current options.

11.3 Offering discounts for prompt payment provides incentive to settle payments due sooner and helps to improve the Council's collection rates. Applying a discount means the full cost is not recovered, however it serves as a cost avoidance, when compared against the cost associated with pursuing overdue debt. Early payment also reduces the need to set aside allowances for risk of non-payment.

11.4 All payment options will involve some risk of non-collection. Arrears balances will be monitored and provision for bad debts will be adjusted accordingly based on collection performance.

11.5 Interest rates applied on payment options are proposed to be based on long-term PWLB fixed rates, as at the start of April for each financial year. This reflects borrowing costs experienced by the Council. Legal advice will also be sought with regards to drafting any repayment agreements.

12.0 Legal implications

12.1 Section 20 of the Landlord and Tenant Act 1985 (as amended) imposes a requirement on Landlords to consult with Leaseholders in respect of qualifying works (e.g. where a leaseholder's contribution is in excess of £250) or a qualifying long term agreements (agreements entered into by the landlord for a period in excess of 12 months which result in a yearly contribution from any one leaseholder in excess of £100). Failure to comply with the consultation requirements will mean that only £250 per leaseholder can be recovered by the Landlord in respect of qualifying works and only £100 per leaseholder per financial year can be recovered by the Landlord in respect of qualifying long

term agreements. These various consultation requirements are set out in the Service Charges (Consultation Requirements) (England) Regulations 2003.

12.2 In some circumstances, it will not be possible to meet all the necessary consultation requirements (e.g. very urgent works on the grounds of safety) and in those circumstances, the landlord can apply to the First Tier Tribunal (Property Chamber) for dispensation from complying with the consultation requirements pursuant to section 20. The Tribunal has discretion to grant dispensation if it takes the view that it is reasonable to do so.

12.3 The leaseholder protections in the Building Safety Act 2022 came into force on 28 June 2022 with new financial protections for leaseholders in buildings above 11 metres or five storeys with historical safety defects. The accompanying secondary legislation came into force on 21 July 2022, providing further detail on how the measures in the Act will work and ensuring that the full range of leaseholder protections have their full effect. Qualifying leaseholders are protected from all cladding system remediation costs. Those whose property is calculated as being less than £325,000 (in Greater London) or whose building owner has a group net worth of more than £2 million per relevant building, as of 14 February 2022, are exempt from all historical safety remediation costs. The Building Safety Act 2022 ensures that any contribution required from qualifying leaseholders for non-cladding defects and interim measures (including waking watch costs) is firmly capped and spread over 10 years, with costs already paid out since 28 June 2017 counting towards the cap. If remediation costs exceed the cap, building owners must make up the difference.

12.4 The Leasehold Reform (Ground Rent) Act 2022 puts an end to ground rents for most new long residential leasehold properties in England and Wales in respect of leases granted on or after 30 June 2022. Exceptions to this legislation include (i) existing leases, (ii) leases granted pursuant to contracts exchanged before 30 June 2022 (iii) business leases and (iv) statutory lease extensions.

13.0 Equality implications

13.1 The proposed enhancements are borough wide and there is no adverse impact upon any particular group of resident leaseholders. The revised payment options will be available to all resident leaseholders when their property is included in the major works programme. In addition, we will ensure that equality, diversity, and inclusion implications will be assessed when communicating the new options to leaseholders and taking feedback

Report sign off:

Peter Gadsdon
Corporate Director Resident Services

APPENDIX 1

Current and proposed leaseholder repayment options

Policy	At present	Proposed	Condition for change/Comment
Resident leaseholder, maximum interest free repayment term (bills under £39,999)	2 years	5 years	Payment must be made by direct debit – No minimum amount
Resident leaseholder, maximum interest free repayment term (bills over £40,000)	2 years	10 years	Payment must be made by direct debit – No minimum amount
Resident leaseholder, maximum repayment term (bills under £39,999)	None	10 years (with interest bearing years 6-10)	Invoice up to £39,999.00, payment must be by direct debit
Resident leaseholder, maximum repayment term (bills over £40,000)	None	20 years (with interest bearing years 10-15)	Invoice must be £40k or more, payment must be by direct debit
Statutory Loans – Charge against property	Loan payment 5.05% up to 10 years invoice over £2k	Loan payment PWLB rates. 10 years invoice over £2k	Charge against property until debt is fully paid
Repayment Interest rate period	n/a	%	PWLB rates, apply changes annual on 1st April
Increase 5% discount period for paying in full	28 days	12 Months for invoice over £1k	payment must be by direct debit
Assistance for home owners are struggling to pay	Some sign posting to debt agencies	Increased sign posting to a wider range of welfare and benefits agencies, including Department for work and pensions	Available to all leaseholders who are facing hardship or difficulty paying
Assistance for home owners are struggling to pay leaseholders both non-resident and resident	Buy Back scheme at 100% market value via i4B or BHM where there are funds	Buy Back scheme at 100% market value via i4B or BHM	Available to all leaseholders who are facing hardship or difficulty paying
Assistance for home owners are struggling to pay	Buy Back at 75% value and resident	Advertised and promoted option to resident leaseholders	Available to resident leaseholders in affected estates (5.1)

non-resident leaseholders	leaseholder becomes secure tenant	for Council to Buy Back at 75% value and resident leaseholder becomes secure tenant	

Benchmarking Option table – Appendix 2

Borough	Maximum Interest Free (R)	Maximum Interest Free (NR)	Interest Bearing (R) Maximum period	Interest Bearing (R) Rate	Discretionary loan rate	Interest Bearing (NR)	Maximum Repayment Period	Discount % with payment in full
Homes for Haringey	180 months (15yrs) £60k and over	60 months (5 yrs) £60k and over	120 months (10 yrs)	5.19%	2% above Base rate	120 Months (10 years)	25 years	5% for 30 days
Other Payment options	In Exceptional circumstances deferred payment loans with enough value in the property to cover the loan and compound interest							
Camden	60 months (5 yrs)	60 months (5 yrs)	300 months (25 yrs)	3.13%	3.13%	N/A	25 Years	5% for 6 weeks
Other Payment options	1)Leaseholders can Defer payments for up to a year where the bill is over £10k if there is financial hardship 2) Buybacks are offered where the leaseholder becomes a secure tenant and remains in the flat 3) Interest bearing voluntary charge for up to 25 years							
Croydon	48 months (4 yrs)	48 months (4 yrs)	120 months (10 yrs)			N/A	10 years	
Other Payment options	1. Deferred payment where leaseholders aged over 60 can place a legal charge interest free until the sale of the property 2. Qualifying leaseholders- Discretionary loan Interest only repayment period of up to 25 years with a charge on the property							
	36 months (3 yrs)	36 months (3 yrs)	120 months (10 yrs)	1% above Base rate	2.5 % or Base rate plus 1 %	N/A	10 years	5% for 6 weeks

					whichever is the greater			
Other Payment options	Voluntary legal charge option for those in extreme financial hardship or vulnerable leaseholders with 2 options, interest bearing until the property is sold or no repayments until the property is sold (interest will be rolled up and recovered once the property is sold.							
Southwark	48 months/72 months for £60k	36 months (3 yrs)		2% above Base rate	1.5% above Base rate	N/A	4 years	N/A
Other Payment options	1) Equity Share Scheme whereby they can off-set charges by taking an Equity Share in the property either by a Shared Ownership lease or a legal charge 2) Buyback option including non-residents 3) Landlords Service Charge Loan invoice over £5k over term of 25 years							
Barnet	24 months (2 yrs)							2.5 % within 28 days
Other Payment options	N/A							
Westminister	60 months (5 yrs) invoice over £2k	24 months (2 yrs)	60 months (5 yrs)	1% above Base rate	1% above Base rate	N/A	5 years	N/A
Other Payment options	1) Buyback scheme 2) Deferred payment scheme with Interest bearing for 25 years only in exceptional circumstances							

Kensington and Chelsea	120 months (10 yrs) £40k and over	36 months (3 yrs) (3 yrs) £40k and over	240 months (10 yrs)	1% above Base rate	Varies in line with Base rate (exact rate is currently under review)	N/A	20 Years	5% for 12 weeks
Other Payment options	.	Place a Legal charge only in certain circumstances						
Islington	36 months/60 months over £10k	24 months (2 yrs)	120 months (10 yrs)	1% above Base rate	1% above Base rate	N/A	10 Years	5% if 95% of the invoice paid
Other Payment options	Buybacks are offered							
Waltham Forest	36 months (3 yrs)	36 months (3 yrs)	120 months (10 yrs)	Bank of England Base rate	Bank of England Base rate	N/A	10 years	3% for 21 days
Other Payment options								
Tower Hamlets	24 months (2 yrs)	24 months (2 yrs)	120 months (10 yrs)	5.35%		N/A	10 Years	5% for 28 days
Other Payment options	Voluntary charge for over 60's receiving full benefit at 0.5 % above council borrowing rate.							
Hackney	24 months (2 yrs)	12 months (1 yr)	120 months (10 yrs)			On a case by case basis	10 Years	5% for 60 days

Other Payment options	1) Invoices deferred for leaseholders aged over 60 secured by a charging order. 2) Equity Share in the property. 3) Buyback the property whereby the leaseholder becomes a sitting tenant							
Hammersmith and Fulham	36 months (3 yrs)	36 months (3 yrs)	120 months (10 yrs)	5% above Base rate	0.25 % above the average council lending rate for the previous year	5% above Base rate	10 Years	2.5% for 30 days
Other Payment options	1) Delayed payments with interest payment only in certain circumstances. 2) Delayed payment in exceptional circumstances whereby a charge is placed on the property and the balance is deferred until the sale.							

*R Resident Leaseholder *NR Non-Resident Leaseholder

Kilburn Square

Work ready	Y	N		Support required	Y	N		Brent support req	Y	N	
Decant	Y	N		Estimated time required to be decanted				Respite	Y	N	
Additional information:											

Name:			Date:		
Address:			Number of bedrooms:		
Leaseholder:	Yes	No	Tenanted:	Yes	No
Contact No's			Alternative contact numbers:		
Email address:			Main method of communication:		

Health Issues

(Please State) Are you happy to share with us any health conditions that you feel could affect the works or your health while the works are being carried out within your home to all members of the household.

Family members within your home

Total number of family members within the household								
Age groups within the household	AGE	Under 16	17-24	25-35	36-55	56-74	75+	

Pets

Dogs	Cats:	Other Pets:

Hearing Loss					
Partial		Fully		Use of a Hearing Aid	
Yes	NO	YES	NO	Yes	NO

Visually impaired			
Partial		Fully	
YES	NO	YES	NO

Mobility assistance							
Stick		Zimmer Frame		Disability Scooter		Wheelchair	
YES	NO	YES	NO	YES	NO	YES	NO

Any other information
Allergies (Please State)
Long Term Illness (Please State)
Learning Disabilities (Please State)
Other Health issues (Please State)

Work Commitments							
Full Time		Part Time		Shift Work (specify Night/Day/Other)		Work from home	
Yes	No	Yes	No	Yes	No	Yes	No

Would you then require the use of a desk within the respite area?	Yes	No
Please provide any further information		

Holidays/ Religious Festival you would like us to be aware of.		
Yes	No	Dates:

Willing to Leave Key			
Yes	No		
Key safe required	Yes	No	
Spare keys to be supplied	Yes	No	

School Runs	
Morning	
Times	
Afternoon	
Times	

Any further information

Condition of rooms	
Bedroom 1	**Bedroom 2**
Floor Covering:	Floor covering:
Walls and Ceiling Covering	Walls Ceiling Covering:
Basic room layout/MUST - include a photograph	Basic room layout/MUST - include a photograph
Radiator present Yes / No Location of radiator Does the radiator need to be removed for the works? Yes / No	Radiator present Yes / No Location of radiator Does the radiator need to be removed for the works? Yes / No
Existing pipe work layout	Existing pipe work layout

Items present in the room and additional Information	Items present in the room and additional Information
Bedroom 3	**Living Room**
Floor Covering:	Floor covering:
Walls and Ceiling Covering	Walls and Ceiling Covering:
Basic room layout/MUST - include a photograph	Basic room layout/MUST - include a photograph
Radiator present Yes / No Location of radiator Does the radiator need to be removed for the works? Yes / No	Radiator present Yes / No Location of radiator Does the radiator need to be removed for the works? Yes / No
Existing pipe work layout	Existing pipe work layout

Items present in the room and additional Information	Items present in the room and additional Information
Hallway	**Hallway Cupboard**
Floor Covering:	Floor covering:
Walls and Ceiling Covering	Walls and Ceiling Covering:
Basic room layout/MUST - include a photograph	Items stored within the cupboard/MUST - include a photograph
Radiator present Yes / No Location of radiator Does the radiator need to be removed for the works? Yes / No	Additional Information

Existing pipe work layout	Existing pipe work layout		
Kitchen	**Bathroom**	**Yes**	**No**
Floor Covering:	Floor Covering:		
Walls and Ceiling Covering	Walls and Ceiling Covering		
Basic room layout/MUST - include a photograph	Basic room layout/MUST - include a photograph		
Radiator present Yes / No Location of radiator Does the radiator need to be removed for the works? Yes / No	Radiator present Yes / No Location of radiator Does the radiator need to be removed for the works? Yes / No		
Number of kitchen /MUST - include a photograph	Bath/MUST - include a photograph bath size		

	Basin present ?	Yes	No
Cooker type Electric Gas	Basin type?		
Existing pipe work layout	Existing pipe work layout		
Others	**WC – Separate**	**Yes**	**No**
	Floor Covering:		
	Walls and Ceiling Covering		
	Basic room layout/MUST - include a photograph		

	Radiator present Yes / No Location of radiator Does the radiator need to be removed for the works? Yes / No		
	Basin present?	Yes	No
	Basin type?		
	Existing pipe work layout		
Boiler information			
Boiler type	Boilers make Model		
Boiler position	Boiler require replacing		

Additional Actions required to enable access to work area:

Support required:

Assistance required:

Visit and Survey Carried out by:

Name 1: _____

Name 2: _____

Witnessed by:
Resident Name: _____

Resident Signature: _____

Date: _____

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Brent	**Cabinet** 6th February 2023
	Report from the Corporate Director, Resident Services

Authority to award contract for the provision and management of bike hangars in Brent

Wards Affected:	All
Key or Non-Key Decision:	Non-Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	Two Appendix A: Tender Evaluation Grid Appendix B: Product Image
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Debbie Huckle Team Leader, Safety and Travel Planning 020 8937 5570 Deborah.Huckle@brent.gov.uk Sandor Fazekas Head of Healthy Streets and Parking 020 8937 5113 Sandor.Fazekas@brent.gov.uk

1.0 PURPOSE OF THE REPORT

1.1 This report concerns the award of a contract for the purchase and management of future bike hangars and the transfer of the management and maintenance of current bike hangars.

1.2 Cabinet approved a report titled “Brent Bike Hangars” on 20th June 2022, which detailed the current arrangements, aims and objectives to reduce and standardise the annual costs for future and existing bike hangar users, and the tendering of a contract.

1.3 This report requests approval to award contracts as required by Contract Standing Order 88. It summarises the process undertaken in tendering this

contract and, following the completion of the evaluation of the tenders, recommends to whom the contracts should be awarded, setting out the financial savings and benefits associated with the contract.

2.0 RECOMMENDATION

That Cabinet:

2.1 Approves the award of a contract for the purchase and management of future bike hangars and the transfer of the management and maintenance of current bike hangars to Lock It Safe Ltd for an initial contract period of three (3) years, with an option to extend for up to a further two (2) years on an annual basis.

2.2 Notes that the value of the contract referred to in 2.1 above is estimated to be £90,000 for year 1 but that this value may increase if further funding is made available through S106 developer funding and Transport for London Local Implementation Plan funding in future years.

3.0 BACKGROUND

3.1 Following a successful trial in 2016, the Council has continued to install bike hangars when funding has been available, and there are currently 104 bike hangars in Brent which includes 5 on Brent owned housing estates.

3.2 Originally Cyclehoop Ltd ("Cyclehoop") were the main providers for bike hangars in the borough, but due to their limited supply and in order to meet growing demand for bike hangars in the borough, Cabinet approved the use of the Waltham Forest Framework on 9th March 2020, which enabled the use of both Cyclehoop and Falco UK Ltd ("Falco") as suppliers to provide, install and manage these assets.

3.3 Once a bike hangar has been installed the supplier is responsible for the management, maintenance, and any associated repairs. If a bike hangar is damaged and the bikes need to be removed, the supplier will contact the residents to inform them of this and will arrange for the repairs to be completed as soon as practicable.

3.4 To date, the Council has received approximately 520 individual requests for bike hangar spaces and this number is increasing on a weekly basis. Information on cycle parking and requesting a bike hangar can be found on the Council's website at: Cycle parking, repair stations and maintenance | Brent Council

3.5 In 2020, Scrutiny Committee raised concerns about the cost of bike hangars to residents and made comparisons to the cost of a parking permit. Whilst officers are of the view that these are not clearly comparable as the cost of providing, managing, and maintaining a bike hangar would exceed that of a parking space,

it was agreed that officers would explore opportunities to reduce costs to residents, as the numbers increase.

3.6 There are currently 104 bike hangar units installed around the borough. Under the current arrangements, there are three tiers of rental fees for hangars.

- For hangars installed prior to 2022, the full management and maintenance cost is £72 per hangar per year. However, the council agreed to subsidise half of this cost (£36) for 3 years. After the initial 3 years, the council subsidy ceases, and residents are charged the full £72 per hangar per annum.

- For the new hangars installed early in 2022, the council was able to negotiate a reduction in management and maintenance costs of £48 per hangar per annum.

3.7 On 20th June 2022, Officers presented to Cabinet a report seeking approval to tender for the purchase and management of future bike hangars and transfer of the management and maintenance of current bike hangars thereby providing the Council with the opportunity to reduce and remove subsidising costs and standardise the annual costs for future and existing bike hangar users. This was approved.

The Tender Process

3.8 Once confirmation of total funding was received, advertisements were placed on the London Tenders Portal (the council's electronic tendering facility) and Contracts Finder on 28th October 2022.

3.9 Tenderers were required to submit information on the organisation's ability to meet the following criteria:

- Demonstrated ability to provide the service
- Application of relevant experience
- Resources
- Sustainability
- Price

Table 1 below details the criteria and weighting

No.	Technical/ Quality Criteria	Area weighting	Overall weighting
Q1	**SERVICE DELIVERY**	40%	**30%**
Q2	**RELEVANT EXPERIENCE**	30%	

Q3	**RESOURCES**	20%	
Q4	**SUSTAINABILITY – Part 1**	5%	
Q5	**SUSTAINABILITY- Part 2**	5%	
No.	**Price**		**Overall weighting**
1.	PRICING SUBMISSION	100%	**70%**

3.10 Tenderers were also required to submit additional information to confirm their bike hangars can meet the following standards:

- Green in Colour
- Minimum of Solid Secure Gold Standard accreditation
- High Visible margin strip
- Minimum of 6 spaces
- Suitable for adapted bikes (inclusive for all resident's needs)
- Crash tested

3.11 The tendering pack stated that contractors agree the rental fees to be a maximum of £50 per space. Also, that they must be prepared to take over the management of all the boroughs bike hangars including those purchased from Falco and Cycle Hoop.

Evaluation process

3.12 The tender evaluation was carried out by a panel of officers from Healthy Streets and Parking supported by Procurement.

3.13 All tenders had to be submitted electronically no later than 12:00 noon on 11th November 2022. Tenders were opened on 11th November 2022 and one valid bid was received. Each member of the evaluation panel read the tender application and carried out an initial evaluation, considering each of the award criteria and how well the tender addressed such criteria.

3.14 The panel met on 16th November 2022 and the submission was scored by the whole panel against the award criteria.

Table 2 below details the scoring used.

Score	Definition	
0	The information required is either omitted or fundamentally fails to meet the relevant submission requirements to address the Council's requirements. Insufficient evidence to demonstrate that the relevant submission requirements or the Council's requirements can be met.	**Unacceptable**
1	The information submitted has insufficient evidence that the specified requirements can be met. Significant omissions, serious and/or many concerns.	**Major reservations**
2	The information submitted has some minor omissions in respect of the relevant submission requirements. The tender satisfies the basic minimum requirements in some respects but is unsatisfactory in other respects and raises some concerns.	**Some Reservations**
3	The information submitted provides some good evidence to meet the relevant submission requirements and/or the Council's requirements. It is satisfactory in most respects and there are no major concerns.	**Satisfactory**
4	The information submitted provides good evidence that all the relevant submission requirements and/or the Council's requirements can be met. Full and robust response, any concerns are addressed so that the proposal gives confidence.	**Good**
5	The information submitted provides good evidence that all the relevant submission requirements and/or the Council's requirements can be met, and the proposal is outstanding. Exemplary in the industry, provides full confidence and no concerns.	**Outstanding**

3.15 The name of sole tenderer is Lock it Safe Ltd. and the scores received by the tenderer are included in Appendix A. It will be noted from the scoring for Lock

it Safe Ltd. that Officers had confidence in the ability of the tenderer to deliver the service and at a price that was realistic based on Officers knowledge of the market. Officers therefore recommend awarding the contract to Lock it Safe Ltd. as it meets the award criteria. Images of their product are included in Appendix B

3.16 The contract will commence on 27th February 2022 subject to the Council's observation of a voluntary standstill period.

4 FINANCIAL IMPLICATIONS

4.1 Each bike hangar is estimated to cost £3,034, inclusion of installation and delivery per unit. The annual £250 maintenance and management costs will be met through the income received from users at £50 per space, rental cost per annum. Including Brent Fast Track, the total cost per unit is £3,242.95.

4.2 The funding for year one of the contract will be met from £56,000 section 106 development funding and £34,000 from Transport for London, Local Implementation Plan funding.

4.3 The award is likely to provide additional cost savings to both the Council and for residents and businesses using the bike hangars over the next 3 to 5 years, as the supplier will fund all repairs, which are currently funded by the council. In addition, residents that have rented a space for 3+ years will benefit from a reduced rental cost.

4.4 Officers anticipate that further funding will be made available through S106 and Transport for London over the next few years that can be used for additional bike hangars through this contract.

5 LEGAL IMPLICATIONS

5.1 Planning permission for cycle parking facilities is not required under the Town and Country Planning Act 1990.

5.2 The Highways Act 1980 permits local authorities to place objects or structures on a highway for the purposes of providing a service for the benefit of the public or a section of the public.

5.3 The requirements for publication and consultation regarding the making of Traffic Management Orders are set out in the Road Traffic Regulation Act 1984.

5.4 The estimated value of the proposed call off contract is £90k and as such it falls below the threshold for Supplies and Services under the Public Contracts Regulations 2015 (the "PCR 2015") and the procurement is therefore governed in part only by the PCR 2015.

5.5 The procurement is subject to the Council's own Standing Orders and Financial Regulations in respect of Low Value Contracts. Whilst Corporate Directors /

Directors ordinarily have authority to approve the award of the contract, Cabinet approval is required where the decision falls within paragraph 12 of Part 3 of the Constitution, namely is a “Strategic and high-level highways and transportation matter which includes decisions which affect 4 wards or more”. As such Cabinet approval is required for the award of the proposed contract for cycle hangars.

5.6 Recommendation 2.2 indicates that the value of the contract may increase if further funding is made available through S106 developer funding and Transport for London Local Implementation Plan funding in future years. Should such funding become available, Officers will need to seek a variation to the contract.

6 EQUALITY IMPLICATIONS

6.1 Pursuant to s149 Equality Act 2010 (the “Public Sector Equality Duty”), the Council must, in the exercise of its functions, have due regard to the need to:

(a) eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act
(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,

6.2 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.

6.3 Having due regard involves the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.

6.4 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.

6.5 The proposals in this report have been subject to screening and Officers consider that there are no adverse equality implications arising from this report at this time. It should be noted that the successful bidder can provide safe cycle parking for disability bikes / cargo bikes as required. However, an Equality Assessment will be carried out for any future proposals for cycle parking

facilities after the consultation with all affected residents, businesses, and other stakeholders.

6.6 An Equalities Assessment will be also included in the Delegated Authority decision report for approval by the Head of Healthy streets and Parking which will take into consideration the results of the consultation process in determining suitable locations for the new bike hangars.

7 CONSULTATION WITH WARD MEMBERS AND STAKEHOLDERS

7.1 Prior to installing a bike hangar Officers will consult with Ward Councillors, stakeholders, and local residents to enlist support on the proposed location.

8 HUMAN RESOURCES / PROPERTY IMPLICATIONS (IF APPROPRIATE)

8.1 There are no implications for Council staff arising from this procurement. Similarly, there are no property implications arising from the award of the contract.

9.0 PUBLIC SERVICES (SOCIAL VALUE) ACT 2012

9.1 The Council is under duty pursuant to the Public Services (Social Value) Act 2012 ("the Social Value Act") to consider how services being procured might improve the economic, social, and environmental well-being of its area; how, in conducting the procurement process, the Council might act with a view to securing that improvement; and whether the Council should undertake consultation. This duty does not strictly apply to the proposed contract as it is not primarily a services contract, with the value of goods exceeding the value of services and the total value of this contract is expected to be below the threshold for application of the PCR 2015.

Related Documents:
Cabinet Report titled: Brent Bike Hangars 20th June 2022

Report sign off:

Peter Gadsdon
Corporate Director, Resident Services

APPENDIX A

Bike Hangar Programme Installation and Management Contract

TENDER EVALUATION GRID

Project title - DN640319

Quality		Weighting	Lock It Safe Ltd	
		5	Score	Result
1	Question 1 Service Delivery	40%	2	16.00%
2	Question 2 Relevant Experience	30%	4	24.00%
3	Question 3 Resources	20%	4	16.00%
4	Question 4 Sustainability Part 1	5%	4	4.00%
5	Question 5 Sustainability Part 2	5%	4	4.00%
Total out of 100%		**100%**	**64.00%**	
Total out of 30%		**30%**	**19.2%**	

Commercial		Weighting	Lock It Safe Ltd
8	Costs submission	70%	£3,242.95
Total		**70%**	**70.00%**

Summary	Weighting	Lock It Safe Ltd
Quality	30%	19.20%
Commercial	70%	70.00%
Total	**100%**	**89.20%**

Ranking	1

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APPENDIX B

Images of Lock It Safe Ltd Bike Hangars

Brent	**Cabinet** 6th February 2023
	Corporate Director, Children and Young People

Determination of School Admission Arrangements for Brent Community Primary Schools 2024/25

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	Three: Appendix 1: List of Primary Community Schools in Brent Appendix 2: Proposed Admissions Arrangements 2024/25 Appendix 3: Scheme of Coordination for 2024/25
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Michelle Gwyther Interim Head of Forward Planning, Performance and Partnerships Michelle.gwyther@brent.gov.uk Shirley Parks, Director, Safeguarding, Partnerships and Strategy 020 8937 4529 shirley.parks@brent.gov.uk

1.0 Purpose of the Report

1.1 This report sets out the outcome of consultation on proposed amendments to the Admission Arrangements for Brent Community Primary Schools for 2024/25 agreed by Cabinet in November 2022. The report seeks Cabinet's agreement to the proposed admission arrangements and schemes of co-ordination for Brent community schools for the 2024/25 academic year in accordance with statutory requirements. Admission authorities are required to determine their admission arrangements by 28 February in the determination year.

2.0 Recommendations

That Cabinet:

2.1 Notes the consultation outcomes on the proposed amendments to the Admission Arrangements.

2.2 Agrees the proposed admission arrangements for Brent community schools and the scheme of co-ordination for maintained schools in Brent for the 2024/2025 academic year (Appendix 2 and 3).

3.0 Detail

3.1 This report relates to the admission arrangements and oversubscription criteria of Brent community primary schools only. Brent Council is the admission authority for 30 community primary schools in the Borough (Appendix 1). Voluntary Aided (VA) and foundation schools, academies and free schools are their own admission authority and determine their own admission arrangements and oversubscription criteria.

3.2 The School Admissions Code issued under Section 84 of the School Standards and Framework Act is the legal framework for school admissions matters. The Admissions Code requires that admission authorities have a mechanism to rank applications in order of priority. All schools and admission authorities must have admission arrangements that clearly set out how children will be admitted, including the criteria that will be applied if there are more applications than places at the school. Admission arrangements for Brent community schools are determined by the Council as the admission authority.

3.3 At its meeting on 14 November 2022, Cabinet granted approval for the Council to carry out public consultation to amend its admission arrangements for the academic year 2024/2025. The reasons for the proposed amendments are set out in the relevant cabinet report.

3.4 Consultation was carried out with all relevant parties as identified in the School Admissions Code 2021, for a period of seven weeks between 16 November 2022 and 3 January 2023. The consultation document was available to view on Brent Council's Have Your Say Consultation Portal

3.5 Respondents were invited to complete a survey to indicate whether they agreed or disagreed with the three proposals as set out in Section 4 and to provide reasons for their responses.

4.0 Outcome of consultation

4.1 Consultation was undertaken on the following amendments to the existing admission arrangements:

a) the removal of all admissions criteria determined by catchment area and their replacement with criteria for all siblings and all other children;
b) a change in priority for children of staff criteria so that this is lifted to become the third main criteria within the admission arrangements;
c) expansion of the Medical and Social needs criteria to include consideration of the medical or social needs of family members with caring or parental responsibility for an applicant.

4.2 One formal response to the consultation has been received during the consultation period. The respondent disagreed with the proposal to remove community school catchment areas in the Admission Arrangements for 2024/2025 and the proposal to promote the priority level for children of staff in the Admission Arrangements for 2024/2025. The respondent agreed with the proposal to expand the definitions for social/medical priority to include direct family members with parental responsibility in the Admission Arrangements for 2024/2025.

4.3 The purpose of proposing the removal of catchment areas in the consultation is not to make it more difficult for children to access a nearby school and in some cases it will make it easier. Catchment areas are more useful at times of higher demand and their removal will make the oversubscription clearer and easier to understand.

4.4 The consultation closed on 3rd January 2023. On the basis of the responses received, it is proposed that the three amendments are included in the Admissions Arrangements for 2024/25 (Appendix 2).

4.5 The Schemes of Co-ordination (Appendix 3) adopted by all London authorities are based on the suggested wording provided annually by the London Inter Authority Admissions Group (LIAAG). These were published on the Brent website by 31 December 2022 and will be appended to the Admission Arrangements when they have been determined. There are no changes to the Schemes of Co-ordination from previous years except to update them with the relevant Admission process dates.

5.0 Financial Implications

5.1 There are no specific financial implications arising from this report.

6.0 Legal Implications

6.1 The Council as admission authority has a duty to undertake consultation on admission policies in order to determine admission arrangements, including admission numbers under Part III of the School Standards and Framework Act 1998 and the School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012/8.

6.2 Admission authorities must act in accordance with the mandatory requirements of the School Admissions Code 2014 and have due regard to the discretionary

elements of the Code. They must also act in accordance with other laws relating to admissions and relevant human rights and equalities legislation.

6.3 Oversubscription criteria must be reasonable, clear, objective and comply with all relevant legislation, including equalities legislation. Highest priority in the oversubscription criteria must be given to looked after children and previously looked after children (Regulation 7, Admission Arrangements Regulations 2012). Subject to these requirements it is for the admission authority to decide which other criteria would be suitable according to the local circumstances.

6.4 The local authority must determine admission arrangements for 2024/25 by 28 February 2023.

7.0 Equality Implications

7.1 The public sector equality duty, as set out in section 149 of the Equality Act 2010, requires the Council, when exercising its functions, to have "due regard" to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a "protected characteristic" and those who do not share that protected characteristic. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

7.2 Having due regard involves the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.

7.3 There is no prescribed manner in which the Council must exercise its public sector equality duty but having an adequate evidence base for its decision is necessary. The Admissions Criteria ensure fair access to school places. Cabinet is referred to the contents of this report for further information, in particular Section 4.0.

8.0 Consultation with Ward Members and Stakeholders

8.1 The Lead Member for Children, Young People and Schools was briefed on the proposed changes set out in section 4.0. All ward members were included in the consultation.

9.0 Human Resources/Property Implications (if appropriate)

9.1 There are no human resources or property implications.

Report sign off:

Nigel Chapman
Corporate Director of Children & Young People

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Appendix 1 – List of Primary Community Schools in Brent

Anson Primary School	Kingsbury Green Primary School	Oliver Goldsmith Primary School
Barham Primary School	Leopold Primary School	Park Lane Primary School
Brentfield Primary School	Lyon Park Primary School	Preston Park Primary School
Byron Court Primary School	Malorees Infant School	Roe Green Infant School
Carlton Vale Infant School	Mitchell Brook Primary School	Roe Green Junior School
Chalkhill Primary School	Mora Primary School	Salusbury Primary School
Donnington Primary School	Mount Stewart Infant School	The Stonebridge School
Elsley Primary School	Mount Stewart Junior School	Uxendon Manor Primary School
Fryent Primary School	Newfield Primary School	Wembley Primary School
Harlesden Primary School	Northview Primary School	Wykeham Primary School

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Brent	**PROPOSED ADMISSION ARRANGEMENTS FOR BRENT COMMUNITY SCHOOLS FOR 2024/2025**

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Brent Community Primary School Published Admission Numbers and Grid Reference Measuring Points for Admission in 2024/2025

Name of School	Published Admission Number	Grid Reference Measuring Point	
		Easting	Northing
Anson Primary School	52	523552	185345
Barham Primary School	120	517506	184655
Brentfield Primary School	90	520541	184537
Byron Court Primary School	150	517133	186955
Carlton Vale Infant School	60	524938	182956
Chalkhill Primary School	60	520005	186210
Donnington Primary School	30	522577	184004
Elsley Primary School	120	518869	184738
Fryent Primary School	120	520385	187897
Harlesden Primary School	60	521141	183461
Kingsbury Green Primary School	90	520010	188549
Leopold Primary School	120	521640	184310
- Gwenneth Rickus Site		520810	184490
Lyon Park Primary School	120	518820	184115
Malorees Infant School	60	523952	184011
Mitchell Brook Primary School	90	521010	184768
Mora Primary School	60	523141	185939
Mount Stewart Infant School	90	517785	187999
Mount Stewart Junior School	90	517785	187999
Newfield Primary School	60	521890	184050
Northview Primary School	30	521580	185500
Oliver Goldsmith Primary School	60	520809	188559
Park Lane Primary School	60	518380	185490
Preston Park Primary School	120	517930	187200
Roe Green Infant School	120	519772	189316
Roe Green Junior School	120	519772	189316
Salusbury Primary School	90	524528	183518
The Stonebridge School	90	520512	183844
Uxendon Manor Primary School	90	518023	188541
Wembley Primary School	120	518365	186130
Wykeham Primary School	60	521087	186286

Oversubscription Criteria for Brent Community Schools in 2024/2025

The criteria set out below apply to the 30 Brent community schools listed on page 2.

Voluntary aided or religious faith schools, foundation schools, free schools and academies have their own admission policies. Parents/carers should visit the website of these schools for a copy of their admission arrangements or visit www.brent.gov.uk/admissions

Applications for children with an Education, Health and Care Plan (EHCP) are made by Local Authority SEN teams. The placement of such children is made after a process of consultation between parents/carers, the school and the Local Authority. Children with an EHCP receive priority over others for admission to the school named on their EHCP. An EHCP is a plan made by the Local Authority under Section 37 of the Children and Families Act 2014 specifying the special education provision required for that child.

Schools should not admit more than 30 pupils in each class for Reception, Year One and Year Two. This is to enable the Local Authority to meet its statutory duty of having no more than 30 pupils in each class at Key Stage One. Three-year-old children should not be admitted to Reception classes.

The following criteria are clear, fair and objective. It is illegal for schools to discriminate against a pupil on the basis of his/her ethnicity.

Whenever and wherever possible, children are offered a school of their parents'/carers' preference and in practice the majority of children go to the school which their parents/carers select for them.

Sometimes, however, there are more applications for a particular school than there are places available. This is described as oversubscription. Whenever this happens, pupils are offered places in the following order of priority:

1. Looked After Children or Previously Looked After Children (including Internationally Adopted Previously Looked After Children)

A looked after child or a previously looked after child, including those children who appear to have been in state care outside of England and ceased to be in state care as a result of being adopted.

- A 'looked after child' (LAC) is a child who is in the care of a local authority, or being provided with accommodation by a local authority in the exercise of their social services functions at the time of making an application to a school.
- A 'previously looked after child' (PLAC) is a child who was looked after but ceased to be so because they were adopted (or became subject to a child arrangements order or a special guardianship order).
- An 'internationally adopted previously looked after child' (IAPLAC) is a child who appears to Brent Council to have been in state care outside of England and ceased to be in state care as a result of being adopted. A child is regarded as having been in state care in a place outside of England if they were accommodated by a public authority, a religious organisation or any other provider of care whose sole purpose is to benefit society.

2. Linked infant school

Children attending an infant school on the same site as a junior school.

- This criterion only applies to Year 3 applications to Mount Stewart Junior School (for children attending Mount Stewart Infant School) and Roe Green Junior School (for children attending Roe Green Infant School).

3. Medical or Social needs

Exceptional circumstances to do with significant medical needs and or social needs which necessitate a child's placement at one particular school.

This criterion relates to the medical and/or social needs of the child or family members with caring or parental responsibility. The application must be supported by written evidence (see below) that sets out the particular reasons why the school in question is the most suitable and the difficulties that would be caused if the child had to attend another school. The recommendation for this specific school should demonstrate knowledge of the school in terms of location, resources and organisation which deems it essential that the named pupil be admitted to the specific school. The Council will not give higher priority to children under this criterion if the required documents have not been submitted. Decisions on whether to allow the criterion will be made by an admission panel, based on all the evidence available, and will be consistent.

- *Medical Needs*
  Applications made on medical grounds must be accompanied by compelling medical evidence from a GP/hospital consultant at the time of application. The letter from the GP/hospital consultant must provide information about the medical condition, the effects of this condition and why, in view of this, the child needs to attend the preferred school.
  If the school is not the closest to home, the consultant must set out in detail the wholly exceptional circumstances for attending this school and the difficulties that may exist if the child had to attend another school. Medical claims will only be considered for one school and this should be named by the GP/hospital consultant. In assessing these applications, advice will be sought from relevant professionals as required.

- *Social Needs*
  Applications made on social grounds must be accompanied by compelling evidence at the time of application. Social needs claims will be considered where there is involvement from a social worker, or other professional and where it can be demonstrated that the child has exceptional social needs that cannot be met at any other school than the named school. Parents'/carers' circumstances can have an impact on a child's social needs and evidence of this will be considered. In assessing these applications, advice will be sought from relevant professionals as required.

4. Children of staff

Children whose parent/carer is a member of staff:
- who has been employed by the school and has worked predominantly on the school site for two or more years at the time of application; or
- who has been recruited to fill a vacancy at the school for which there is a demonstrable skill shortage.

5. Siblings
Brothers or sisters of a child who attends the school, or an infant or junior school on the same or adjoining site, and who will continue to do so on the date of admission.

- This includes half and step brothers and sisters and foster children so long as they live at the same address - but **not** cousins.

6. All other applicants.

'Tie-break' Distance Measurement

Where pupils meet the same criteria, places will be offered in order of the distance from home to school which will be measured by straight-line, from the address point in the property to the address point in the school, as determined by LLPG (Local Land Property Gazetteer) data. Those living nearer the school will have the higher priority. The measuring system is an integral part of the admission software produced by Servelec Synergy Ltd, uses Ordnance Survey maps and LLPG data and is accurate to 1 centimetre.

Where two or more children, sharing the same priority, live equidistant from a community school and only one place remains, the local authority will use a computerised random allocation to determine which child should be given priority.

Home Address

The address used must be the child's permanent home address on the closing date for on-time applications or at the time of application for late or in-year applications.

This cannot be a business address, childminder's or relative's address, or any address other than child's permanent home address. Only in circumstances where the relative or carer has legal guardianship, and is the main carer, will a different address be considered as the main residence. Evidence will be requested to support this arrangement.

Proof of address is not required to be sent with an application. The council tax reference number should be supplied on the application if the applicant is responsible for paying it. Brent Council will check internal council databases in order to verify the address. Where it is not possible to verify the address or the applicant has recently moved, the Council will write to the applicant to ask for two proofs of address.

Any offer of a place on the basis of address is conditional upon the child living at the appropriate address on the relevant date. Applicants have a responsibility to notify the local authority of any change of address.

Any applications received containing fraudulent or misleading information, or any offers made based on fraudulent or misleading information may be withdrawn where other applicants have been disadvantaged.

Twins, Triplets and other children of multiple births

In the event that the school has one place to offer and the next child on the waiting list is one of twins, triplets or other children of multiple births, the Local Authority will offer both twins, all triplets or children of multiple birth a place even if this means temporarily going over the published admission number.

In the event that one child from a multiple birth has an Education, Health and Care Plan which names a particular community school, all other children from the same multiple birth will be considered under the fourth criteria for the same school – medical or social needs – unless a higher criteria should be applied.

Split residence

Where a child lives with parents/carers with shared responsibility, each for part of a week, the address where the child lives is determined using a joint declaration from the parents/carers stating the pattern of residence. If a child's residence is split equally between both parents/carers, then they will be asked to determine which residential address should be used for the purpose of admission to school. If the residence is not split equally between both parents/carers, then the address used will be the address where the child spends the majority of the school week.

If it is not possible to determine which residential address should be used through a joint declaration, then the address of the parent/carer who is in receipt of child benefit will be used for the purpose of the application. In cases where parents/carers are not eligible for child benefit the address will be that of the parent/carer where the child is registered with the doctor. In cases that still cannot be determined, or are open to dispute by parents/carers, an admission panel will determine how to proceed with the application in accordance with these arrangements, the Admissions Code and any other relevant legislation or guidance. This will not impact on parents'/carers' right to appeal against any decision not to offer a preference school.

Multiple applications

Only one application can be processed for each child. In the event that the local authority receives more than one application for the same child, whether from the same parent/carer or not, the most recently received application will be processed. This includes applications that have been submitted online and by post.

Parents/carers are responsible for ensuring that only one application is received. If multiple applications are received and it is not possible to obtain a joint declaration from both parents/ carers (or those with parental responsibility) regarding which schools should be included as preferences, an admission panel will determine how to proceed with the application in accordance with these arrangements, the Admissions Code and any other relevant legislation or guidance. This will not impact on parents'/carers' right to appeal against any decision not to offer a preference school.

Applications from overseas

Applications with an overseas address will not be accepted for processing by the local authority unless there is evidence of a link to an address in the area and evidence that a child will be living in the area on or before the date of admission.

Where an application is accepted, the address used on the application will be the overseas address until such time as there is evidence of the child's return to the linked address prior to the closing date (or the date for accepting applications as late for good reason). Such evidence received after the closing dates will be considered on the application after National Offer Day.

The local authority is only responsible for making offers for children currently living in the area. If it is not possible to make a preference offer prior to a child's arrival on the relevant offer days, an alternative offer will not be made.

Applications will not be accepted from overseas addresses for in-year applications with the exception of applications for Children of UK Service Personnel (UK Armed Forces) and Crown Servants.

Children of UK Service Personnel (UK Armed Forces) and Crown Servants

Families of service personnel with a confirmed posting to the area, or crown servants returning from overseas to live in the area, can apply to the local authority in advance of their arrival provided the application is accompanied by an official letter that declares a relocation date and a Unit postal address or quartering area address.

The address used on the application will be the postal address or quartering area address provided.

Offers will be made in advance of a child's arrival for in-year applications and on the relevant offer date for normal round applications.

How places will be allocated at Brent community schools for September 2024 in Reception (Primary and Infant schools) and Year 3 (Junior Schools)

There is no automatic transfer from nursery to Reception class. Parents/carers wanting to apply for a place at Reception must complete an application which is available on line or a paper Common Application Form (CAF).

If more applications are received than there are places available, places are offered up to a school's planned admission number to applicants whose application is received by the closing date in accordance with the oversubscription criteria listed on page 3 using an equal preference system (see below).

Equal preferences

Each preference is treated as a separate application. Then using the oversubscription criteria each application is considered and ordered in a list based on how well it meets the oversubscription criteria (page 3).

If applicants qualify for a place at more than one school, a place is offered at the school given the highest ranking by the applicant.

Application forms will be available from September 2022 and the closing date for applications will be 15 January 2023. Offer letters and e-mails will be sent out on 17 April 2023.

Deferred Entry

Parents/carers can request that the date their child is admitted to school is deferred until later in the year for which they apply or until the term in which the child reaches statutory school age. Statutory school age begins the first day of the term after a child's fifth birthday.

Parents/carers wishing to defer entry must contact the school to advise them of this after a place has been offered.

Parents/carers can also request that their child attends part-time until their child reaches statutory school age.

Applications for children outside the normal age group

The Council's policy is for children to be educated within their correct chronological year group, with the curriculum differentiated as necessary to meet the needs of individual children. This is in line with the Department for Education's (DfE) most recent "Advice on the Admission of Summer Born Children", published in December 2014, which states that, "in general, children should be educated in their normal age group, with the curriculum differentiated as appropriate, and that they should only be educated out of their normal age group in very limited circumstances".

If parents/carers believe their child should be educated in a different year group they should submit an application for the 'normal' Reception round for their child, and provide supporting evidence from relevant professionals working with the child and family stating why it is in the child's best interest to be placed outside their normal age appropriate cohort. DfE guidance makes clear that "it is reasonable for admission authorities to expect parents/carers to provide them with information in support of their request – since without it they are unlikely to be able to make a decision on the basis of the circumstances of the case".

For community schools, the Council as the admission authority will decide whether the application will be accepted on the basis of the information submitted. Decisions will be based on the individual circumstances of each case including the view of parents/carers, the relevant head teacher(s), the child's social, academic and emotional development and whether the child has been previously educated out of year group.

There is no guarantee that an application will be accepted on this basis. If the application is not accepted this does not constitute a refusal of a place and there is no right to an independent statutory appeal. Similarly, there is no right of appeal for a place in a specific year group at a school. The internal management and organisation of a school, including the placement of pupils in classes, is a matter for the head teacher and senior leadership of individual schools.

Late Applications and changes after the closing date

Application forms must be received by Brent Council by the closing date of 15 January 2024.

Applications received after the closing date will be considered as late applications and will be processed after places have been allocated to applicants who applied on-time. However, in very exceptional circumstances applications received after the closing date may be considered as on time.

Applicants who consider they have exceptional circumstances that prevented them from applying between applications opening in September 2023 and the closing date of 15 January 2024 should provide independent written evidence explaining why the application was late no later than 5pm on Thursday 8 February 2024.

Additionally, any changes to the application (e.g. order of school preference or change of preferences) received after the closing date will be treated in the same way as late applications.

Changes of Address after the closing date

Changes of address will only be considered after applicants are resident at the new address and evidence to demonstrate this has been supplied. Applications will not be processed from an intended future address except in the case of Crown servants and UK service personnel.

Evidence must be received by 5pm on Thursday 8 February 2024 for the new address to be used when processing the application and calculating home to school distances. Any change of address evidenced after 5pm on Thursday 8 February 2024 will not be included until after National Offer Day 16 April 2024.

Waiting Lists

If the school place allocated is not the first preference, the child's name will automatically be placed on the waiting list for schools which have been ranked higher than the offer made. Community school waiting lists will then be maintained by the Council whilst voluntary aided, foundation and academy schools' waiting lists will be maintained by the relevant schools.

Waiting lists are not maintained on a 'first come - first served' basis. Waiting lists are kept in the priority order as explained in the oversubscription criteria.

Places are offered from the waiting list throughout the year. When a place becomes available, it is offered to the first child on the list and, if it is accepted, all other children will move up the list. Children may also move down the waiting list if another family, with a higher priority under the oversubscription criteria, ask for their child's name to be added to the list.

Applicants, who ask for their child's name to be placed on the waiting list for another school after a school place has been allocated, are indicating they prefer this school to the other school already allocated. If at a later date a place is offered from the waiting list, this new offer will supersede any previous offer, which will then be withdrawn.

Looked after children and previously looked after children, and those allocated a place at the school in accordance with Brent's Fair Access Protocol, will take precedence over those on a waiting list.

Lists will be maintained throughout the school year. A child's position on the waiting list does not depend upon the time they have been on the list but will be determined by how they meet the oversubscription criteria.

This means that a child's position on the list can go down as well as up, depending upon the child's circumstances and those of other applicants.

The waiting list will be closed each year and will not roll over. A new application will have to be made for a new academic year.

Appeals

Parents/carers can appeal against any decision made by Brent Council about the school where they would like their child to be educated.

When an appeal form is requested, the child's name is automatically placed on the waiting list for that school, if it is not already included.

A child admitted to a school as a result of a successful appeal will be admitted in precedence to those on the waiting list.

There is no right of appeal against any decision not to offer a place in a nursery.

Admission to community school nurseries

The timeline and oversubscription criteria for a place in a nursery class in a community school are the same as for a Reception place. The council does not co-ordinate applications for nursery places. Applications for a nursery place in a community school must be made directly to the school by 15th January 2024. Offers will be made on 16th April 2024 by the school. If the nursery is oversubscribed the Community Schools' Oversubscription Criteria will be applied.

In-Year Applications

Applications received outside the normal admission round will be considered in line with the oversubscription criteria.

A place will be offered at the school requested provided there is a vacancy in the appropriate year group. Where the year group is full and it is not possible to meet the parental preference, a place will be offered at the nearest primary school with a vacancy in the year group.

The address used to process the application will be the address where the parent/carer and child normally live and they must be living there at the time of application.

Admission of one child to a primary school does not give a right of admission for brothers or sisters, if places are not available for all at the same time.

Appendix 3

PAN-LONDON CO-ORDINATED ADMISSION SYSTEM

LA Schemes for Co-ordination of Admissions to Year 7/Year 10 and Reception/Junior in Maintained Schools and Academies in 2024/25

Contents

Page 2: Definitions used in this document

Page 4: Scheme for co-ordination of admissions to Year 7 in September 2024

Page 10: Scheme for co-ordination of admissions to Reception in September 2024

Page 15: Content of Common Application Form -Year 7 and Reception Schemes (Schedule 1)

Page 16: Template outcome letter -Year 7 and Reception Schemes (Schedule 2)

Page 17: Timetable for Year 7 Scheme (Schedule 3A)

Page 18: Timetable for Reception Scheme (Schedule 3B)

LA Schemes for Co-ordination of Admissions to Year 7/Year 10 and Reception/Junior in 2024/25

Definitions used in the schemes

"the Application Year"	the academic year in which the parent makes an application (i.e. in relation to the academic year of entry, the academic year preceding it).
"the Board"	the Pan-London Admissions Executive Board, which is responsible for the Scheme
"the Business User Guide (BUG)"	the document issued annually to participating LAs setting out the operational procedures of the Scheme
"the Common Application Form"	this is the form that each authority must have under the Regulations for parents to use to express their preferences, set out in rank order
"the Equal Preference System"	the model whereby all preferences listed by parents on the Common Application Form are considered under the over-subscription criteria for each school without reference to parental rankings. Where a pupil is eligible to be offered a place at more than one school within an LA, or across more than one participating LA, the rankings are used to determine the single offer by selecting the school ranked highest of those which can offer a place
"the Highly Recommended Elements"	the elements of the Scheme that are not mandatory but to which subscription is strongly recommended in order to maximise co-ordination and thereby simplify the application process as far as possible
"the Home LA"	the LA in which the applicant/parent/carer is resident
"the LIAAG Address Protocol"	the document containing the address verification policy agreed by LIAAG and the policy of each participating LA
"the Local Admission System (LAS)"	the IT module for administering admissions in each LA and for determining the highest offer both within and between participating LAs

“the London E-Admissions Portal”	the common online application system used by the 33 London LAs and Surrey County Council
“the Maintaining LA”	the LA which maintains a school, or within whose area an academy is situated, for which a preference has been expressed
“the Mandatory Elements”	those elements of the Scheme to which authorities **must** subscribe in order to be considered as ‘Participating Authorities’ and to benefit from use of the Pan-London Register
“the Notification Letter”	the agreed form of letter sent to applicants on the Prescribed Day which communicates any determination granting or refusing admission to a primary or secondary school, which is attached as Schedule 2
“the Prescribed Day”	the day on which outcome letters are posted to parents/carers. 1 March (secondary) and 16 April (primary) in the year following the relevant determination year except that, in any year in which that day is not a working day, the prescribed day shall be the next working day.
“the Pan-London Register (PLR)”	the database which will sort and transmit application and outcome data between the LAS of each participating LA
“the Pan-London Timetable”	the framework for processing of application and outcome data, which is attached as Schedule 3
“the Participating LA”	any LA that has indicated in the Memorandum of Agreement that they are willing to incorporate, at a minimum, the mandatory elements of the LA Scheme presented here.
“the Qualifying Scheme”	the scheme which each LA is required to formulate in accordance with The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) Regulations 2012, for co-ordinating arrangements for the admission of children to maintained primary and secondary schools and academies.

Scheme for Co-ordination of Admissions to Year 7/Year 10 in 2024/25

Applications

1. Brent LA will advise home LAs of their resident pupils on the roll of Brent LA's maintained primary schools and academies who are eligible to transfer to secondary school in the forthcoming academic year.

2. Applications from residents of Brent LA will be made on Brent LA's Common Application Form, which will be available and able to be submitted on-line. This will include all the fields and information specified in Schedule 1 to Brent LA Scheme. These will be supplemented by any additional fields and information which are deemed necessary by Brent LA to enable the admission authorities in the LA area to apply their published oversubscription criteria.

3. Brent LA will take all reasonable steps to ensure that every parent/carer who is resident in Brent LA and has a child in their last year of primary education within a maintained school or academy, either in Brent LA or any other maintaining LA, is informed how they can access Brent LA's composite prospectus and apply online. Parents/carers who do not live in Brent LA will have access to Brent LA's composite prospectus, which will advise parents/carers to contact their home LA if they are unable to apply online.

4. The admission authorities within Brent LA will not use supplementary information forms except where the information available through the Common Application Form is insufficient for consideration of the application against the published oversubscription criteria. Where supplementary information forms are used by the admissions authorities within Brent LA, the LA will seek to ensure that these are used to collect information required by the published oversubscription criteria only, in accordance with paragraph 2.4 of the School Admissions Code 2021.

5. Where supplementary information forms are used by admission authorities in Brent LA, they will be available on Brent LA's website. Such forms will advise parents that they must also complete their home LA's Common Application Form. Brent LA's composite prospectus and website will indicate which schools in Brent LA require supplementary forms to be completed and where they can be obtained.

6. Where an admission authority in Brent LA receives a supplementary information form, Brent LA will not consider it to be a valid application unless the parent/carer has also listed the school on their home LA's Common Application Form, in accordance with paragraph 2.3 of the School Admissions Code 2021.

7. Applicants will be able to express a preference for six maintained secondary schools or Academies within and/or outside the Home LA.

8. The order of preference given on the Common Application Form will not be revealed to a school within the area of Brent LA. This is to comply with paragraph 1.9 of the School Admissions Code 2021 which states that admission authorities must not give extra priority to children whose parents rank preferred schools in a particular order, including 'first preference first' arrangements. However, where a parent resident in Brent LA expresses a preference for schools in the area of another LA, the order of preference for that LA's schools will be revealed to that LA in order that it can determine the highest ranked preference in cases where an applicant is eligible for a place at more than one school in that LA's area.

9. Brent LA undertakes to carry out the address verification process as set out in its entry in the LIAAG Address Protocol. This will in all cases include validation of resident applicants against Brent LA's primary school data and the further investigation of any discrepancy. Where Brent LA is not satisfied as to the validity of an address of an applicant whose preference has been sent to a maintaining LA, it will advise the maintaining LA no later than **14 December 2023.**

10. Brent LA will confirm the status of any resident child for whom it receives a Common Application Form stating s/he is currently or previously a 'Child Looked After' and will provide any additional evidence on receipt of a reasonable request by the maintaining LA in respect of a preference for a school in its area by **14 November 2023.**

11. Brent LA will advise a maintaining LA of the reason for any application which is made in respect of a child resident in the area of Brent LA to be admitted outside of their correct age cohort, and will forward any supporting documentation to the maintaining LA by **14 November 2023.**

Processing

12. Applicants resident within Brent LA must return the Common Application Form**,** which will be available and able to be submitted on-line, to Brent LA by **31 October 2023.**

13. Application data relating to all preferences for schools in the area of a participating LA, which have been expressed within the terms of Brent LA's scheme, will be up-loaded to the PLR by **14 November 2023.** Supplementary information provided with the Common Application Form will be sent to maintaining LAs by the same date.

14. Brent LA will notify each school within its area, which is its own admissions authority, of all applications for their school. All relevant details from the Common Application Form and any supporting evidence will be forwarded to these schools by **15 December 2023**. Own admission authority schools within Brent LA's area will apply their admissions criteria and return

applicants ranked in order of priority in accordance with their admissions criteria by **18 January 2024**.

15. Brent LA will accept late applications only if they are late for a good reason, deciding each case on its own merits. The latest date for receipt of such applications from parents/carers is **12 December 2023**.

16. Where such applications contain preferences for schools in other LAs, Brent LA will forward the details to maintaining LAs via the PLR as they are received. Brent LA will accept late applications which are considered to be on time within the terms of the home LA's scheme.

17. The latest date for the upload to the PLR of late applications which are considered to be on-time within the terms of the home LA's scheme is **14 December 2023.**

18. Where an applicant moves from one participating home LA to another after submitting an on-time application under the terms of the former home LA's scheme, the new home LA will accept the application as on-time up to **12 December 2023**, on the basis that an on-time application already exists within the Pan-London system.

19. Brent LA will participate in the application data checking exercise scheduled between **15 December 2023 and 2 January 2024** in the Pan-London timetable in Schedule 3A.

20. All preferences for schools within Brent LA will be considered by the relevant admission authorities without reference to rank order to comply with paragraph 1.9 of the School Admissions Code 2021. When the admission authorities within Brent LA have provided a list of applicants in criteria order to Brent LA, Brent LA shall, for each applicant to its schools for whom more than one potential offer is available, use the highest ranked preference to decide which single potential offer to make. [This is the 'Equal Preference System'.]

21. Brent LA will carry out all reasonable checks to ensure that pupil rankings are correctly held in its LAS for all maintained schools and academies in Brent LA's area before uploading data to the PLR.

22. Brent LA will upload the highest potential offer available to an applicant for a maintained school or academy in Brent LA to the PLR by **29 January 2024.** The PLR will transmit the highest potential offer specified by the Maintaining LA to the Home LA.

23. The LAS of Brent LA will eliminate, as a Home LA, all but the highest ranked offer where an applicant has more than one potential offer across Maintaining LAs submitting information within deadline to the PLR. This will involve exchanges of preference outcomes between the LAS and the PLR (in accordance with the iterative timetable published in the Business User Guide) which will continue until notification that a steady state has been

achieved, or until **9 February 2024**. Where a management decision is made that additional iterations are necessary, these will continue no later than **13 February 2024.**

24. Brent LA will not make an additional offer between the end of the iterative process and **1 March 2024** which may impact on an offer being made by another participating LA.

25. Notwithstanding paragraph 24, if an error is identified within the allocation of places at a maintained school or academy in Brent LA, Brent LA will attempt to manually resolve the allocation to correct the error. Where this impacts on another LA (either as a home or maintaining LA) Brent LA will liaise with that LA to attempt to resolve the correct offer and any multiple offers which might occur. However, if another LA is unable to resolve a multiple offer, or if the impact is too far reaching, Brent LA will accept that the applicant(s) affected might receive a multiple offer.

26. Brent LA will participate in the offer data checking exercise scheduled between **14 and 23 February 2024** in the Pan-London timetable in Schedule 3A.

27. Brent LA will send a file to the eAdmissions portal with outcomes for all resident applicants who have applied online no later than **26 February 2024**.

Offers

28. Brent LA will ensure that, if there are places available, each resident applicant who cannot be offered a preference expressed on the Common Application Form receives the offer of an alternative school place in accordance with paragraph 2.11 of the School Admissions Code 2021. [The LA should state here how it will determine the school to be offered].

29. Brent LA will inform all resident applicants of their highest offer of a school place and, where relevant, the reasons why higher preferences were not offered, whether they were for schools in the Home LA or in other participating LAs.

30. Brent LA's outcome letter will include the information set out in Schedule 2.

31. On **1 March 2024,** Brent LA will send notification of the outcome to resident applicants by email or first-class post.

32. Brent LA will provide primary schools with destination data of its resident applicants by the end of the summer term **2024.**

Post Offer

33. Brent LA will request that resident applicants accept or decline the offer of a place by **15 March 2024,** or within two weeks of the date of any subsequent offer.

34. Where an applicant resident in Brent LA accepts or declines a place in a school within the area of another LA by **15 March 2024,** Brent LA will forward the information to the maintaining LA by **22 March 2024**. Where such information is received from applicants after **15 March 2024**, Brent LA will pass it to the maintaining LA as it is received.

35. Where a place becomes available in an oversubscribed maintained school or academy in Brent LA's area, it will be offered from a waiting list ordered in accordance with paragraph 2.15 of the School Admissions Code 2021.

36. When acting as a maintaining LA, Brent LA will place an applicant resident in the area of another LA on a waiting list of any higher preference school in Brent LA's area. (Where this process is not automatic, it will be done immediately following a request from the home LA).

37. Where a waiting list is maintained by an admission authority of a maintained school or academy in Brent LA's area, the admission authority will inform Brent LA of a potential offer, in order that the offer may be made by the home LA.

38. When acting as a maintaining LA, Brent LA will inform the home LA, where different, of an offer for a maintained school or Academy in Brent LA's area which can be made to an applicant resident in the home LA's area, in order that the home LA can offer the place.

39. When acting as a maintaining LA, Brent LA and the admission authorities within it, will not inform an applicant resident in another LA that a place can be offered.

40. When acting as a home LA, Brent LA will offer a place at a maintained school or Academy in the area of another LA to an applicant resident in its area, provided that the school is ranked higher on the Common Application Form than any school already offered.

41. When acting as a home LA, when Brent LA is informed by a maintaining LA of an offer which can be made to an applicant resident in Brent LA's area which is ranked lower on the Common Application Form than any school already offered, it will inform the maintaining LA that the offer will not be made.

42. When acting as a home LA, when Brent LA has agreed to a change of preferences or preference order, it will inform any maintaining LA affected by the change. In such cases, paragraphs 40 and 41 shall apply to the revised order of preferences.

43. When acting as a maintaining LA, Brent LA will inform the home LA, where different, of any change to an applicant's offer status as soon as it occurs.

44. When acting as a maintaining LA, Brent LA will accept a change of preferences or preference order (including reinstated or additional preferences) from home LAs for maintained schools and academies in its area.

1. Brent LA, when acting as a maintaining LA, will maintain waiting lists and allocate places, as they become available, in accordance with each admission authority's published admission and oversubscription criteria.

2. Brent LA, when acting as a home LA, will carry out the initial offer of places which become available after National Offer Day by the week ending **29 March 2024**.

3. Brent LA, when acting as a home LA, after preferences expressed in accordance with paragraph 7 above have been determined, will allow applicants to express additional preferences before the start of the school term. The order of preferences expressed will supersede any existing preferences without an offer.

LA Scheme for Co-ordination of Admissions to Reception/Junior in 2024/25

Applications

1. Applications from residents of Brent LA will be made on Brent LA's Common Application Form, which will be available and able to be submitted on-line. This will include all the fields and information specified in Schedule 1 to Brent LA Scheme. These will be supplemented by any additional fields and information which are deemed necessary by Brent LA to enable the admission authorities in the LA area to apply their published oversubscription criteria.

2. Brent LA will take all reasonable steps to ensure that every parent/carer who is resident in Brent LA and has a child in a nursery class within a maintained school or academy, either in Brent LA or any other maintaining LA, is informed how they can access Brent LA's composite prospectus and apply online. Parents/carers who do not live in Brent LA will have access to Brent LA's composite prospectus, which will advise parents/carers to contact their home LA if they are unable to apply online.

3. The admission authorities within Brent LA will not use supplementary information forms except where the information available through the Common Application Form is insufficient for consideration of the application against the published oversubscription criteria. Where supplementary information forms are used by the admissions authorities within Brent LA, the LA will seek to ensure that these are used to collect information which is required by the published oversubscription criteria only, in accordance with paragraph 2.4 of the School Admissions Code 2021.

4. Where supplementary information forms are used by admission authorities in Brent LA, they will be available on Brent LA's website. Such forms will advise parents that they must also complete their home LA's Common Application Form. Brent LA's composite prospectus and website will indicate which schools in Brent LA require supplementary forms to be completed and where they can be obtained.

5. Where a school in Brent LA receives a supplementary information form, Brent LA will not consider it to be a valid application unless the parent/carer has also listed the school on their home LA's Common Application Form, in accordance with paragraph 2.3 of the School Admissions Code 2021.

6. Applicants will be able to express a preference for up to six maintained primary schools or academies within and/or outside the Home LA.

7. The order of preference given on the Common Application Form will not be revealed to a school within the area of Brent LA to comply with paragraph 1.9 of the School Admissions Code 2021. However, where a parent resident in

Brent LA expresses a preference for schools in the area of another LA, the order of preference for that LA's schools will be revealed to that LA in order that it can determine the highest ranked preference in cases where an applicant is eligible for a place at more than one school in that LA's area.

8. Brent LA undertakes to carry out the address verification process set out in its entry in the LIAAG Address Protocol. This will in all cases include validation of resident applicants against Brent LA's maintained nursery and primary school data and the further investigation of any discrepancy. Where Brent LA is not satisfied as to the validity of an address of an applicant whose preference has been sent to a maintaining LA, it will advise the maintaining LA no later than **9 February 2024.**

9. Brent LA will confirm the status of any resident child for whom it receives a Common Application Form stating s/he is currently or previously a 'Child Looked After' and will provide any additional evidence on receipt of a reasonable request by the maintaining LA in respect of a preference for a school in its area by **2 February 2024**.

10. Brent LA will advise a maintaining LA of the reason for any application which is made in respect of a child resident in the area of Brent LA to be admitted outside of their correct age cohort, and will forward any supporting documentation to the maintaining LA by **2 February 2024.**

Processing

11. Applicants resident within Brent LA must return the Common Application Form**,** which will be available and able to be submitted online, to Brent LA by **15 January 2024.**

12. Application data relating to all preferences for schools in the area of a participating LA, which have been expressed within the terms of Brent LA's scheme, will be up-loaded to the PLR by **2 February 2024.** Supplementary information provided with the Common Application Form will be sent to maintaining LAs by the same date.

13. Brent LA will notify each school within its area, which is its own admissions authority, of all applications for their school. All relevant details from the Common Application Form and any supporting evidence will be forwarded to these schools by **12 February 2024**. Own admission authority schools within Brent LA's area will apply their admissions criteria and return applicants ranked in order of priority in accordance with their admissions criteria by **23 February 2024**.

14. Brent LA will accept late applications only if they are late for a good reason, deciding each case on its own merits. [If this recommendation is deemed inappropriate for this authority an alternative approach should be substituted]

15. Where such applications contain preferences for schools in other LAs, Brent LA will forward the details to maintaining LAs via the PLR as they are received.

Brent LA will accept late applications which are considered to be on time within the terms of the home LA's scheme.

16. The latest date for the upload to the PLR of late applications which are considered to be on-time within the terms of the home LA's scheme is **9 February 2024.**

17. Where an applicant moves from one participating home LA to another after submitting an on-time application under the terms of the former home LA's scheme, the new home LA will accept the application as on-time up to **8 February 2024**, on the basis that an on-time application already exists within the Pan-London system.

18. Brent LA will participate in the application data checking exercise scheduled between **12 and 16 February 2024** in the Pan-London timetable in Schedule 3B.

19. All preferences for schools within Brent LA will be considered by the relevant admission authorities without reference to rank order to comply with paragraph 1.9 of the School Admissions Code 2021. When the admission authorities within Brent LA have provided a list of applicants in criteria order to Brent LA, Brent LA shall, for each applicant to its schools for whom more than one potential offer is available, use the highest ranked preference to decide which single potential offer to make. [This is the 'Equal Preference System'.]

20. Brent LA will carry out all reasonable checks to ensure that pupil rankings are correctly held in its LAS for all maintained schools and academies in Brent LA's area before uploading data to the PLR.

21. Brent LA will upload the highest potential offer available to an applicant for a maintained school or academy in Brent LA to the PLR by **14 March 2024.** The PLR will transmit the highest potential offer specified by the Maintaining LA to the Home LA.

22. The LAS of Brent LA will eliminate, as a Home LA, all but the highest ranked offer where an applicant has more than one potential offer across Maintaining LAs submitting information within deadline to the PLR. This will involve exchanges of preference outcomes between the LAS and the PLR (in accordance with the iterative timetable published in the Business User Guide) which will continue until notification that a steady state has been achieved, or until **22 March 2024**.

23. Brent LA will not make an additional offer between the end of the iterative process and the **16 April 2024** which may impact on an offer being made by another participating LA.

24. Notwithstanding paragraph 23, if an error is identified within the allocation of places at a maintained school or academy in Brent LA, Brent LA will attempt to manually resolve the allocation to correct the error. Where this impacts on another LA (either as a home or maintaining LA) Brent LA will liaise with that LA to attempt to resolve the correct offer and any multiple offers which might occur. However, if another LA is unable to resolve a multiple offer, or if the

impact is too far reaching, Brent LA will accept that the applicant(s) affected might receive a multiple offer.

25. Brent LA will participate in the offer data checking exercise scheduled between **25 March and 10 April 2024** in the Pan-London timetable in Schedule 3B.

26. Brent LA will send a file to the eAdmissions portal with outcomes for all resident applicants who have applied online no later than **10 April 2024**.

Offers

27. Brent LA will ensure that, if there are places available, each resident applicant who cannot be offered a preference expressed on the Common Application Form, receives the offer of an alternative school place in accordance with paragraph 2.12 of the Schools Admissions Code 2021. [The LA should state here how it will determine the school to be offered].

28. Brent LA will inform all resident applicants of their highest offer of a school place and, where relevant, the reasons why higher preferences were not offered, whether they were for schools in the Home LA or in other participating LAs.

29. Brent LA's outcome letter will include the information set out in Schedule 2.

30. Brent LA will, on **16 April 2024,** send notification of the outcome to resident applicants by email or first class post.

31. Brent LA will provide nursery and primary schools with destination data of its resident applicants by the end of the Summer term 2024.

Post Offer

32. Brent LA will request that resident applicants accept or decline the offer of a place by **30 April 2024,** or within two weeks of the date of any subsequent offer.

33. Where an applicant resident in Brent LA accepts or declines a place in a school maintained by another LA by **30 April 2024**, Brent LA will forward the information to the maintaining LA by **8 May 2024**. Where such information is received from applicants after **1 May 2024**, Brent LA will pass it to the maintaining LA as it is received.

34. Where a place becomes available in an oversubscribed maintained school or academy in Brent LA's area, it will be offered from a waiting list ordered in accordance with paragraph 2.15 of the School Admissions Code 2021.

35. When acting as a maintaining LA, Brent LA will place an applicant resident in the area of another LA on a waiting list of any higher preference school. Where this is not done automatically, it will be done immediately following a request from the home LA.

36. Where a waiting list is maintained by an admission authority of a maintained school or academy in Brent LA's area, the admission authority will inform Brent LA of a potential offer, in order that the offer may be made by the home LA.

37. When acting as a maintaining LA, Brent LA will inform the home LA, where different, of an offer for a maintained school or Academy in Brent LA's area which can be made to an applicant resident in the home LA's area, in order that the home LA can offer the place.

38. When acting as a maintaining LA, Brent LA and the admission authorities within it, will not inform an applicant resident in another LA that a place can be offered.

39. When acting as a home LA, Brent LA will offer a place at a maintained school or Academy in the area of another LA to an applicant resident in its area, provided that the school is ranked higher on the Common Application Form than any school already offered.

40. When acting as a home LA, when Brent LA is informed by a maintaining LA of an offer which can be made to an applicant resident in Brent LA's area which is ranked lower on the Common Application Form than any school already offered, it will inform the maintaining LA that the offer will not be made.

41. When acting as a home LA, when Brent LA has agreed to a change of preferences or preference order, it will inform any maintaining LA affected by the change. In such cases, paragraphs 39 and 40 shall apply to the revised order of preferences.

42. When acting as a maintaining LA, Brent LA will inform the home LA, where different, of any change to an applicant's offer status as soon as it occurs.

43. When acting as a maintaining LA, Brent LA will accept a change of preferences or preference order (including reinstated or additional preferences) from home LAs for maintained schools and academies in its area.

44. Brent LA, when acting as a maintaining LA, will maintain waiting lists and allocate places, as they become available, in accordance with each admission authority's published admission and oversubscription criteria.

45. Brent LA, when acting as a home LA, will carry out the initial offer of places which become available after National Offer Day by the week ending **10th May 2024**.

46. Brent LA, when acting as a home LA, after preferences expressed in accordance with paragraph 7 above have been determined, will allow applicants to express additional preferences before the start of the school term. The order of preferences expressed will supersede any existing preferences without an offer.

Minimum Content of Common Application Form for Admissions to Year 7/Year 10 and Reception/Junior in 2024/25

Child's details:
Surname
Forename(s)
Middle name(s)
Date of Birth
Gender
Home address
Name of current school
Address of current school (if outside home LA)

Parent's details:
Title
Surname
Forename
Address (if different to child's address)
Telephone Number (Home, Daytime, Mobile)
Email address
Relationship to child

Preference details (x 6 recommended):
Name of school
Address of school
Preference ranking
Local authority in which the school is based

Additional information:
Reasons for Preferences (including any medical or social reasons)
Does the child have an Education, Health and Care Plan Y/N*
Is the child a 'Child Looked After (CLA)'? Y/N
Is the child formerly CLA but now adopted or subject of a 'Child Arrangements Order' or 'Special Guardianship Order'? Y/N
If yes, name of responsible local authority
Surname of sibling
Forename of sibling
DOB of sibling
Gender of sibling
Name of school sibling attends

Other:
Signature of parent or guardian
Date of signature

SCHEDULE 2

Template Outcome Letter for Admissions to Year 7/Year 10 and Reception/Junior in 2024/25

From: Home LA

Date: **1 March 2024 (sec)**
16 April 2024 (prim)

Dear Parent/Carer,

Application for a Secondary / Primary School

I am writing to let you know the outcome of your application for a secondary/primary school. Your child has been offered a place at X School. The school will write to you with further details.

I am sorry that it was not possible for your child to be offered a place at any of the schools which you listed as a higher preference on your application form. For each of these schools there were more applications than places, and other applicants has a higher priority than your child under the school's published admission criteria.

Offers which could have been made for any schools which you placed lower in your preference list, were automatically withdrawn under the co-ordinated admission arrangements, as a higher preference has been offered.

If you would like more information about the reason that your child was not offered a place at any higher preference school, you should contact the admission authority that is responsible for admissions to the school within the next few days. Details of the different admission authorities for schools in the borough of X are attached to this letter. If the school is outside the borough of X, the admission authority will either be the borough in which the school is situated, or the school itself.

You have the right of appeal under the School Standards & Framework Act 1998 against the refusal of a place at any of the schools for which you have applied. If you wish to appeal, you must contact the admission authority for the school within the next few days to obtain the procedure and the date by which an appeal must be received by them.

Please would you confirm that you wish to accept the place at X School by completing the reply slip below. If you do not wish to accept the place, you will need to let me know what alternative arrangements you are making for your child's education.

You must contact this office if you wish to apply for any other school, either in this borough or elsewhere.

[You can also request that your child's name is placed on the waiting list for a school which was a higher preference on your application form than the school you have been offered. Please use the enclosed reply slip and return it to this office]. OR

{Your child's name has been placed on the waiting list for any school which was a higher preference on your application form than the school you have been offered. If you need to find out your child's position on the waiting list please contact the admission authority or the borough in which the school is situated}.

(One of the above bracketed paragraphs should be used depending on whether the LA automatically places children on a waiting list for higher preference schools).

*Please return the reply slip to me by **15 March 2024 (sec) / 30 Apr 2024 (prim)**. If you have any questions about this letter, please contact me on _____.*

Yours sincerely

(First preference offer letters should include the paragraphs in italics only)

PAN-LONDON CO-ORDINATED ADMISSIONS SCHEME
SCHEDULE 3A

Timetable for Admissions to Year 7/Year 10 in 2024/25

Date & working days	Process	Paragraph
Tues 31 Oct 2023 ***10 days***	Statutory deadline for receipt of applications	**12**
Tues 14 Nov 2023 ***21 days***	Deadline for the transfer of application information by the Home LA to the PLR (ADT file).	**10, 11, 13**
Tues 12 Dec 2023	Deadline for receipt of late applications considered as "on-time" by parents to Home LA.	**9,17**
Thurs 14 Dec 2023	Deadline for the upload of late applications considered as "on-time" to the PLR.	**9, 17**
Fri 15 Dec 2023 – Tues 2 Jan 2024	Checking of application data	**19**
Wed 3 Jan 2024 ***21 days***	Ranking applications	**19, 20, 21**
Mon 29 Jan 2024 ***8 days***	Deadline for the transfer of potential offer information from Maintaining LAs to the PLR (ALT file)	**22**
Fri 9 Feb 2024	Final ALT file to PLR*	**23**
Mon 12 to Tues 13 Feb 2024	*Additional iterations if needed	**23**
Mon 12 to Fri 16 Feb 2024	*Half Term*	
Wed 14 – Fri 23 Feb 2024 ***8 days***	Checking of offer data	**26**
Mon 26 Feb 2024 ***3 days***	Deadline for on-line ALT file to portal	**27**
Fri 1 Mar 2024 ***10 days***	Offer notifications sent.	**24, 31**
Fri 15 Mar 2024 ***5 days***	Deadline for acceptances	**33, 34**
Fri 22 Mar 2024	Deadline for transfer of acceptances to maintaining LAs	**34**

PAN-LONDON CO-ORDINATED ADMISSIONS SCHEME
SCHEDULE 3B

Timetable for Admissions to Reception/Junior in 2024/25

Date & working days	Process	Paragraph
Mon 15 Jan 2024 ***15 days***	Statutory deadline for receipt of applications	**11**
Fri 2 Feb 2024 ***5 days***	Deadline for the transfer of application information by the Home LA to the PLR (ADT file)	**9, 10, 12**
Thurs 8 Feb 2024	Deadline for receipt of late applications considered as "on-time" by parents to Home LA.	**8, 16**
Fri 9 Feb 2024	Deadline for the upload of late applications considered as "on-time" to the PLR.	**8, 16**
Mon 12 –Fri 16 Feb 2024	Checking of application data	**18**
Mon 12 –Fri 16 Feb 2024	*Half Term*	
Mon 19 Feb 2024 ***18 days***	Ranking applications	**19, 20,**
Thurs 14 Mar 2024 ***6 days***	Deadline for the transfer of potential offer information from the Maintaining LAs to the PLR (ALT file).	**21**
Fri 22 Mar 2024	Final ALT file to PLR	**22**
Mon 25 Mar -Wed 10 Apr 2024	Checking of offer data	**25**
Mon 1 April to Fri 12 April	*Easter Holidays*	
Wed 10 Apr 2024	Deadline for on-line ALT file to portal	**26**
Tues 16 April 2024 ***10 days***	Offer notifications sent.	**23, 30**
Tues 30 April 2024 ***5 days***	Deadline for acceptances	**32, 33**
Wed 8 May 2024	Deadline for transfer of acceptances to maintaining LAs	**33**

Easter Weekend 2024 – Friday 29th March to Monday 1st April