



Brent

Cabinet

Monday 22 May 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)
M Patel

Leader of the Council
Deputy Leader and Cabinet Member for Finance,
Resources & Reform

Donnelly-Jackson
Farah

Cabinet Member for Customers, Communities & Culture
Cabinet Member for Safer Communities & Public
Protection

Grahl
Knight

Cabinet Member for Children, Young People & Schools
Cabinet Member for Housing, Homelessness & Renters
Security

Nerva
Krupa Sheth

Cabinet Member for Public Health & Adult Social Care
Cabinet Member for Environment, Infrastructure and
Climate Action

Tatler

Cabinet Member for Regeneration, Planning & Growth

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

For electronic copies of minutes and agendas please visit:

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Notes for Members - Declarations of Interest:

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

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

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

***Disclosable Pecuniary Interests:**

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

****Personal Interests:**

The business relates to or affects:

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

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

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

or

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

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

Agenda

Introductions, if appropriate.

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

3	Minutes of the Previous Meeting	1 - 10
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To approve the minutes of the previous meeting held on Monday 17 April 2023 as a correct record.

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

5	Petitions (if any)	
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To discuss any petitions from members of the public for which notice has been received, in accordance with Standing Order 66.

6	Reference of item considered by Scrutiny Committees (if any)	11 - 54
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To consider the Executive response provided to the following Scrutiny Task Group report from the Community & Wellbeing Scrutiny Committee:

6.1 Social Prescribing in Brent

This report presents the final report and recommendations from the Task Group established by the Community & Wellbeing Scrutiny Committee to review social prescribing arrangements across Brent, along with the proposed Executive response provided by Brent's Integrated Care Partnership.

Communities & Regeneration Reports

7	Church End Growth Area Masterplan Supplementary Planning Document	55 - 334
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Cabinet in September 2022 approved the draft Church End Growth Area Masterplan Supplementary Planning Document for publication and

statutory consultation. This report sets out the consultation feedback, officer consideration and recommended changes to the document as a result and recommends approval of the Church End Growth Area Masterplan Supplementary Planning Document for adoption.

Ward Affected:

Roundwood &
Willesden
Green

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

Contact Officer: Alice Lester, Director
Regeneration Growth and Employment
020 8937 6441

Alice.Lester@brent.gov.uk

Resident Services Reports

8 Community Led Housing in Brent

335 - 344

The purpose of this report is to update Cabinet on progress in response to a scrutiny recommendation relating to an Affordable Housing review undertaken in 2018 on Community Led Housing (CLH). As part of the update, the report seeks approval to ring-fence a site on Brentfield Road for the purpose of CLH through an established group - Brent Community Land Trust (BCLT).

Ward Affected:

Stonebridge

Lead Member: Cabinet Member for Housing,
Homelessness & Renters Security (Councillor
Promise Knight)

Contact Officer: Emily-Rae Baines, Head of
Affordable Housing & Partnerships
Tel: 020 8937 1131

Emily-Rae.Maxwell@brent.gov.uk

9 Award of Contracts for Enforcement and Collection Agent Services

345 - 364

This report seeks approval to the award of contracts for the provision of the Debt Resolution and Collection Services. The report summarises the procurement approach followed, the decision process and added value commitments of the selected enforcement agents and the ongoing commitment to the Council's Ethical Debt Recovery Policy.

Ward Affected:

All Wards

Lead Member: Cabinet Member for Customers,
Communities & Culture (Councillor Fleur
Donnelly-Jackson)

Contact Officer: Thomas Cattermole
Director of Customer Access
020 8937 5446

Thomas.Cattermole@brent.gov.uk

Finance & Resources Reports

- 10 Authority to tender contract to design, build, operate and maintain the South Kilburn District Heat Network** 365 - 376

This report seeks approval to invite tenders in respect of a contract to design, build, operate and maintain a district heat network in South Kilburn, which will provide low carbon heat to the South Kilburn regeneration programme.

Ward Affected:
Kilburn

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

Contact Officer: Oliver Myers, Head of Environmental Strategy & Commissioning
Tel: 020 8937 5323
oliver.myers@brent.gov.uk

Children and Young People & Finance & Resources Reports

- 11 Brent Residential Children's Care Home Outline Project Business Case** 377 - 390

This report sets out the intention to provide a Residential Children's Care Home in Brent following the successful application for capital funding from the Department for Education (DfE) Children's Home Capital Programme. The report seeks Cabinet approval of the outline project business case to allow the identification of a suitable property and any required building works along with the proposed operating model of the care home.

Ward Affected:
All Wards

Lead Member: Cabinet Member for Children, Young People & Schools (Councillor Gwen Grahl) & Deputy Leader and Cabinet Member for Finance, Resources and Reform (Councillor Mili Patel)

Contact Officer: Neil Martin, Schools Capital Programme Team
020 8937 4203
neil.martin@brent.gov.uk

Children & Young People Reports

- 12 Post-16 Skills Resource Centre** 391 - 402

This report presents a proposal to develop a Post-16 Skills Resource Centre for young people and young adults with special educational needs. The proposed Post-16 Skills Resource Centre is outlined in the School Place Planning Strategy 2019-23 refresh, approved by Cabinet in November 2021, and is included within the local partnership SEND Strategy 2021-25.

Ward Affected:
All Wards

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

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

13 Exclusion of Press and Public

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

Agenda Item 9: Award of Contracts for Enforcement and Collection Agent Services – Appendix 2 (Name of Tenderers)

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

14 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: 19 June 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 17 April 2023 at
10.00 am

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

1. **Apologies for Absence**

An apology for absence was received from Phil Porter (Corporate Director Adult Social Care & Health) with Tom Shakespeare (Integrated Care Partnership Director) attending as his representative.

2. **Declarations of Interest**

No declarations of interest were made at the meeting.

3. **Minutes of the Previous Meeting**

RESOLVED that the minutes of the previous meeting held on Monday 13 March 2023 be approved as an accurate record of the meeting.

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

None.

5. **Petitions (if any)**

There were no petitions submitted for consideration at the meeting.

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

There were no references from either the Community & Wellbeing or Resources & Public Realm Scrutiny Committee submitted for consideration at the meeting.

7. **Household Support Fund 2023/24**

Councillor Donnelly-Jackson (Cabinet Member for Customers, Communities & Culture) introduced the report providing details on the Government's announcement regarding the extension of the Household Support Fund (HSF) from 1 April 2023 to 31 March 2024, seeking agreement to proposals for the subsequent allocation and distribution of the HSF in Brent.

In considering the report, members welcomed the extension of the HSF and proposed approach towards the allocation funding and support within Brent (as detailed in section 4 of the report) which it was felt highlighted the Council's ongoing

commitment to support vulnerable households and young people across the borough.

Having noted the increased demand for financial support as a result of the cost-of-living crisis and number of households being supported through the proactive initiatives outlined, along with the relevant eligibility criteria and guidance Cabinet

RESOLVED:

- (1) To note Brent's allocation for the Household Support Fund (HSF) for the period 1 April 2023 to 31 March 2024.
- (2) To approve the proposed approach for allocating and distributing the HSF as set out in section 4 of the report.
- (3) To approve, subsequent to (2) above, the Corporate Director of Resident Services in consultation with the Cabinet Member for Customers, Communities and Culture exercising his authority to establish revised eligibility criteria regarding the Household Support Fund grant scheme as may be necessary to enable the appropriate allocation of funding.
- (4) Subsequent to (2) above, to approve the Corporate Director of Resident Services in consultation with the Cabinet Member for Customers, Communities and Culture being granted the authority to amend the Council's eligibility criteria during the lifetime of this Household Support Fund grant scheme if necessary for the reasons detailed in paragraph 3.6 of the report, subject to the parameters set by the Department for Work and Pensions in its Determination and Guidance.

8. Kilburn Library Development and Refurbishment

Councillor Donnelly-Jackson (Cabinet Member for Customers, Communities & Culture) presented a report that detailed the business case for investment to upgrade the premises and facilities at Kilburn Library.

In introducing the report, members were advised of the alignment of the project with the Council's core strategic objectives, Asset Management and the Library Service Action Plan with funding secured through a successful bid under the second round of the Arts Council England's (ACE) 'Library Improvement Fund' programme. This had resulted in the award of £231,000 in February 2023, with members pleased to note this had been matched with an additional allocation of £534,000 funded through the Council's Strategic Community Infrastructure Levy (SCIL) bringing the total budget allocated for the project to £765,000.

In welcoming the investment identified, members recognised the current poor state of repair of the existing facilities with the investment designed to ensure these were fit for purpose and able to meet expanded service delivery and community use requirements in an accessible and energy efficient way.

In commending the refurbishment and development proposals, members were keen to highlight their support for the investment as a means of enhancing existing facilities and providing a more flexible, modern and accessible resource for community use, recognising the social value provided through the borough's

libraries. Members also welcomed the use of SCIL funding given the level of support this investment would provide towards development and growth across the area and recognising the continued benefits identified through this type of financial contribution to support local community use, growth and development. As a final contribution Councillor Nerva, as a ward councillor for Queens Park, also commended the investment and refurbishment proposals highlighting how well used the existing facility were. Support was also expressed for the proposed investment in the garden, given the associated environmental and health and wellbeing benefits identified, in order to ensure a sustainable arrangement working with the local community for its future use.

Having considered the report Cabinet therefore **RESOLVED**:

- (1) To note the proposals to redevelop the library for reasons detailed in section 3.1 of the report.
- (2) To approve the project budget of £765k which would be funded by £231k from Arts Council England Grant and £534k from SCIL, on the basis outlined in section 4 of the report
- (3) To note that temporary facilities would be identified in the immediate locality while works were underway.

9. Selective Licensing in the Private Rented Sector in Brent 2023

Councillor Promise Knight (Cabinet Member for Housing, Homelessness & Renters Security) introduced a report seeking approval to renew and extend the private rented sector selective licensing scheme within the borough.

In considering the report Cabinet noted the recent growth in the private rented sector across the borough, with around 58,000 homes now privately rented (representing 46% of total dwellings). Members were advised the scheme would require landlords of privately rented accommodation within the designated areas to apply for a Council licence and comply with the property management licence conditions designed to ensure required standards were met in relation to property conditions and the way in which tenants are treated. Consultation on the proposed scheme had run for 12 weeks from October 2022 to January 2023, with 853 individuals and organisations having responded. In noting the detailed findings of the consultation process (as set out in Appendix 1 of the report) members were advised that in terms of an overall response, the majority of residents and businesses who engaged were in favour of the scheme with landlords less in favour or not all.

Cabinet noted that initial approval was being sought for a designation (as a proposed first phase) covering a total of three wards (Dollis Hill, Harlesden & Kensal Green and Willesden Green) for five years with these areas covering 18% of the Private Rented Housing Stock in Brent, on the basis of poor property conditions and anti-social behaviour.

Members thanked officers for the work undertaken to gather the necessary evidence to support development of the scheme along with the extensive nature of the consultation process. In welcoming the scope of the selective licensing scheme

in seeking to address poor property conditions and anti-social behaviour directly with private sector landlords, members were keen to recognise how this would ensure support and safeguards were provided for tenants within the private rented sector in the designated areas. Cabinet also welcomed and noted the additional work being undertaken in support of a possible further designation (Designation 2/2023) at the appropriate time.

Having noted the report and with no further comments, Cabinet **RESOLVED**:

- (1) To note the outcome of the consultation process detailed in the Consultation Findings Report of February 2023 and the report Appendices (Appendix 1 & 1A), the representations received and the Council's consideration thereof, and response to these representations as detailed within Appendix 2 of the report.
- (2) To note the consultation evidence (as detailed within Appendix 3 of the report) relating to the problems being caused by poorly managed privately rented properties, and that the report had considered that selective licensing would assist the Council in achieving wider objectives, as well as the alternatives to licensing.
- (3) To note the content of the Equality Impact Assessment as set out in Appendix 9 of the report.
- (4) To note the legal implications as detailed within section 11 of the report which set out the legislative requirements of selective licensing.
- (5) To note that upon approval, if granted, the scheme shall be publicised via an agreed communications plan, and in accordance with the regulations before the scheme comes into force.
- (6) To agree that the evidence report (included as Appendix 3 to the report) highlights that the legal requirements as set out in paragraphs 11.6 to 11.27 of the report for introducing Selective Licensing on the grounds of anti-social behaviour (ASB); and/or poor property conditions have been met regarding the proposed selective licensing designation.
- (7) To note that this designation falls within the description of designations in relation to which the Secretary of State has given a general approval under section 82 of the Housing Act 2004 and The Housing Act 2004: Licensing of Houses in Multiple Occupation and Selective Licensing of Other Residential Accommodation (England) General Approval 2015 as both the size of the private rented stock and the geographical area of the designation are under 20%
- (8) To agree, subject to (1) and (2) above, to authorise the designation of 3 wards for selective licensing to last for five years from the date of designations coming into force, and which cover the following Council wards as delineated and edged red on the map in Appendix 4 of the report:

Designation 1/2023: A selective licensing scheme designation in the wards of Dollis Hill, Harlesden & Kensal Green, Willesden Green under Part 3, s.80

Housing Act 2004 on the grounds of (1) poor housing (property) conditions and (2) ASB with effect from 1 August 2023 (in accordance with the criteria set out in the Housing Act 2004 and Selective Licensing of Houses (Additional Conditions) (England) Order 2015 , or at a later date in accordance with the statutory time required for the scheme to come into force.

- (9) To agree that the selective scheme described in (8) above shall be cited as the London Borough of Brent Designation No 1/2023
- (10) To agree the authority to issue the required statutory notification in relation to the Selective Licensing Scheme Designation 1/2023 is delegated to the Corporate Director of Residents Services, in consultation with the Cabinet member for Housing, Homelessness, and Renters' Security
- (11) To agree that, subject to the issue of statutory notifications, that the Corporate Director of Residents Services, in consultation with the Cabinet Member for Housing, Homelessness & Renters Security is authorised to decide the date from which the council will begin to accept applications for selective licensing.
- (12) To agree to the proposed fee structure for licence applications made under the Selective Licensing scheme set out in Appendix 7 and in section 9 of the report.
- (13) To agree that authority be delegated to the Corporate Director of Residents Services, in consultation with the Cabinet Member for Housing, Homelessness & Renters Security to agree the basis for, and level of any changes including discounts which may be applied to the licensing application fees.
- (14) To agree that the standard licensing conditions for licences granted in the proposed designation areas for selective licensing as set out in Appendix 8 of the report be approved and to authorise the Corporate Director for Residents Services, in consultation with the Cabinet Member for Housing, Homelessness & Renters Security, to make any minor variations to such licensing conditions.
- (15) To note that the Selective Licensing scheme will be kept under review at least annually and that any significant changes, including the withdrawal of a licensing designation or a proposal to introduce any new designation(s), will be subject to further decision by Cabinet.
- (16) To note the letters of support for the licensing proposals as attached in Appendix 10 of the report.
- (17) To note that a further report will be brought to Cabinet in 2023 regarding any further proposed designation.

10. **Community Grant (NCIL) Funding**

Councillor Donnelly-Jackson (Cabinet Member for Customers, Communities & Culture) introduced the report, which detailed the outcome of a review and proposed change in approach to the delivery of community grants, including the current arrangements for the Neighbourhood Community Infrastructure Levy (NCIL) programme agreed by Cabinet in 2020.

In considering the report members noted the current community grant offer and dates when each of the grant funds were scheduled to reopen for applications in 2023, along with the increase in demand and growth in the number of applications being received. In terms of the main focus of the current review, members were advised this involved NCIL, including a proposed change in name to Community Grant and model for allocation of funding in relation to non-neighbourhood areas as detailed within section 5 of the report. Members were advised this would not affect existing responsibilities, with the statutory requirement for NCIL funded projects being maintained under the new Community Grant model. The approach outlined would also provide for the allocation of up to an additional £500,000 “pot” designated for boroughwide projects that sought to mitigate the impact development had on the borough as a whole.

In thanking those officers involved for their work on the review and in developing the proposals, Cabinet welcomed the evolution of the community grants programme recognising this an additional benefit being delivered through the programme of regeneration across the borough for local communities to access. Planning officers were also thanked for their ongoing efforts in securing and collecting CIL contributions, with members recognising the increasingly challenging nature of the process and generation of future CIL receipts given the impact of current economic pressures on the construction sector within Brent and across London as a whole. Members also welcomed the communications and engagement plan designed to support the new Community Grant approach along with the enhanced due diligence and safeguarding checks to ensure applications continued to meet the required assessment criteria and were sustainable. As a final point, members also highlighted a need to ensure that the CIL Neighbourhood boundaries were reviewed, as necessary, to ensure they also reflected the recent change in ward boundaries.

Having considered the report and with no further comments, Cabinet **RESOLVED:**

- (1) To agree the name of Neighbourhood Community Infrastructure Levy (NCIL) Grant to be referred to as Community Grant (NCIL).
- (2) To agree to open one Community Grant (NCIL) round per financial year.
- (3) To agree to the amount of community grant to be released as set out in paragraph 5.1 of the report for distribution across the Brent Connects areas.
- (4) To agree to allocate up to an additional £500,000 ‘pot’ for boroughwide projects.
- (5) To agree to revise the award process for the Community Grant (NCIL) in line with paragraph 5.1 of the report.

- (6) To delegate authority to the Corporate Director Communities and Regeneration to undertake a consultation on neighbourhood priorities and consider the responses to the consultation and thereafter proceed with implementing the model for the community grant.

11. Brent Civic Centre – Approval to commercially let Civic Centre surplus floor space(s)

Councillor Mili Patel (Deputy Leader & Cabinet Member for Finance, Resources & Reform) introduced a report which, following approval of the Council's budget for 2023-24, set out the approach towards the letting of additional floor space in the Civic Centre to external organisations included as one of the agreed budget saving targets.

In considering the report, Cabinet noted progress with the Civic Centre 'restack' project, which had been designed to assist in rationalising use of the Civic Centre and optimise space available for external letting purposes. The restack project was scheduled to be completed by the end of April 2023 and was anticipated to release up to 19,309 square feet of additional space. Despite the challenging nature of the current commercial office rental market, a commercial property agent had been appointed to commence marketing of the additional space identified within the Civic Centre, including the potential to let space to a flex-operator with details of current negotiations (including existing tenants) outlined within the exempt appendix (Appendix 1) of the report.

Cabinet were supportive of the approach outlined and, having noted the exempt information contained in Appendix 1 of the report, therefore **RESOLVED** to delegate authority to the Corporate Director of Finance & Resources in consultation with the Cabinet Member for Finance, Resources & Reform to agree the terms of the lease(s) and enter into lease agreements with existing tenants, as highlighted in paragraph 3.4 of the report, and with prospective tenants identified through marketing.

12. Section 75 agreement for Better Care Fund

Councillor Nerva (Cabinet Member for Public Health & Adult Social Care) introduced a report seeking approval for the Council to enter into a partnership arrangement, under Section 75 of the National Health Service Act 2006, in respect of delivery of the approved Better Care Fund Plan with North West London Integrated Commissioning Board for 2023/24 and onwards.

In considering the report, members noted the innovative approach to the use of the Better Care Fund within Brent as part of a process of well-established collaboration and joint working between the Council and local health services through the Integrated Care Partnership.

Having noted the priorities outlined in relation to the Better Care Fund and details on how the Fund was being used to improve care arrangements Cabinet **RESOLVED:**

- (1) To approve entry into an agreement with North West London Integrated Commissioning Board pursuant to Section 75 of the National Health Service

Act 2006 in respect of the Better Care Fund to support integrated and jointly commissioned services for an initial period of one year for the financial year 2023/24, with the ability to extend the agreement by period or periods up to a further 4 years.

- (2) To delegate authority to the Corporate Director of Adult Social Care and Health in consultation with the Cabinet Member for Health and Social Care, to extend the agreement referred to in (1) above by such period or periods as are considered appropriate up to a further 4 years, such extensions to conclude by 31 March 2028.
- (3) To approve the transfer of the Council's pro rata contribution as set out in paragraph 4.1 of the report for the financial year 2023/24 to the Better Care Fund pooled budget.
- (4) To delegate authority to the Corporate Director, Adult Social Care and Health in consultation with the Cabinet Member for Health and Social Care and the Corporate Director, Finance and Resources to make annual financial contributions to the Better Care Fund pooled budget for subsequent financial years provided that there is no substantial change in partnership arrangements.

13. **Review of the Use of Regulation of Investigatory Powers Act 2000**

Councillor Mili Patel (Deputy Leader & Cabinet Member for Finance, Resources & Reform) introduced the report, which informed Cabinet of the Council's use and conduct of surveillance techniques in accordance with the Regulation of Investigatory Powers Act (RIPA) 2000 and sought approval to changes within the Council's RIPA policy.

In considering the report, members noted the decline in use of RIPA over recent years, with zero RIPA Directed Surveillance or Covert Human Intelligence Source (CHIS) authorisations in Brent during 2022-23 and two request for Communications Data, as detailed within section 3 of the report. Members were advised that the predominant use of RIPA was now focussed around the enforcement of trading standards controls and in the context of serious fraud investigations. Members were advised that the Council's RIPA policies, procedures and practice were subject to periodic inspection by the Investigatory Powers Commissioner's Office (IPCO), with the last inspection undertaken in March 2020. No recommendations had been identified as a result of the inspection with the next review due around 2023-24.

In terms of the changes proposed to the Council's RIPA policy, members were advised these related to the need to incorporate powers introduced within Sections 37 to 44 of the Police, Crime, Sentencing and Courts Act 2022 (PCSCA), which had come into force in November 2022 and provided additional power to extract (communications) data held on electronic devices as well as the need to reflect changes in officer titles as a result of the Council's recent senior management restructure.

Having considered the report and welcomed the outcome of the last inspection, Cabinet **RESOLVED:**

- (1) To approve the proposed changes to the RIPA policy attached as Appendix A to the report.
- (2) To note the oversight role of Audit & Standards Advisory Committee (ASAC), and that this matter was considered by the committee at its meeting on the 21 March 2023.
- (3) To note the oversight role of the Monitoring Officer (MO) and regular reviews being undertaken by the MO and senior management.

14. Exclusion of Press and Public

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


15. Any other urgent business

Councillor Muhammed Butt (Leader of Council) took the opportunity to formally thank Carolyn Downs for her hard work, dedication and support to the Cabinet during her time as Chief Executive, noting this would be the final Cabinet meeting in advance of her retirement.

The meeting ended at 10.20 am

COUNCILLOR MUHAMMED BUTT
Chair

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	Cabinet 22 May 2023
	Report from the Social Prescribing Task Group
Recommendations from Community & Wellbeing Scrutiny Committee: Social Prescribing Task Group	

Wards Affected:	All
Key or Non-Key Decision:	Non-Key Decision
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
Appendices:	Two: Appendix 1: Community & Wellbeing Social Prescribing Task Group Report Appendix 2: Executive response to Social Prescribing Scrutiny Task Group Report
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	George Kockelbergh Strategy Lead – Scrutiny 020 8937 5477 George.Kockelbergh@brent.gov.uk Tom Pickup – Policy, Partnerships and Scrutiny Manager Tom.Pickup@brent.gov.uk Janet Latinwo – Head of Strategy and Partnerships 020 8937 4104 Janet.Latinwo@brent.gov.uk

1.0 Purpose of the Report

- 1.1 To share the Brent Integrated Care Partnership's Executive Response to the Social Prescribing Task Group's final report and recommendations with Cabinet.
- 1.2 Additionally, to seek Cabinet's endorsement for the recommendations made by the Social Prescribing Task Group and the response to them provided by the Brent Integrated Care Partnership.

2.0 Recommendation(s)

That Cabinet:

- 2.1 Endorse the Task Group's recommendations, as set out in Paragraph 3.3, and the response to them provided by the Brent Integrated Care Partnership as set out in Appendix 2.

3.0 Detail

- 3.1 Scrutiny committees have the power to commission evidence-based reviews of a policy area of function of its local authority led by non-executive members; these reviews are commonly referred to as Task Groups. The Social Prescribing Scrutiny Task Group was established by the Community and Wellbeing Scrutiny Committee at its 22 September 2022 meeting. It was established as the committee wanted to review current social prescribing provision in Brent and explore how it could be further developed to benefit residents in Brent
- 3.2 As part of the Task Group's work, it has produced a final written report with ambitious and actionable recommendations made to the Brent Integrated Care Partnership. These recommendations are in accordance with Part 4 of the Brent Council Constitution which states the Community and Wellbeing Scrutiny Committee may make recommendations to relevant NHS bodies or relevant health service providers. This Task Group's recommendations have therefore been made to the Brent Integrated Care Partnership as they have the remit to implement them.
- 3.3 This report and its recommendations were discussed and confirmed at the March 2023 meeting of the Community and Wellbeing Scrutiny Committee. The recommendations were as follows:
 - **Recommendation 1:** It is recommended that Brent's social prescribing model is widened from NHS primary care settings, to enable ICP partners, front line social care and selected front-line council staff to use social prescribing approaches. The Brent Integrated Care Partnership should lead in developing a social prescribing approach for Brent, where partners work together to ensure that all of Brent's residents have the opportunity to benefit from the holistic approach of social prescribing, as a way of further tackling health inequalities in the borough.
 - **Recommendation 2:** It is recommended that there is an equitable social prescribing offer across the borough that explicitly addresses deeply entrenched and intersectional health inequalities, listens to, and responds to communities, and ensures funding is allocated by areas of Brent with higher levels of deprivation.
 - **Recommendation 3:** It is recommended that the Brent Integrated Care Partnership sponsors a social prescribing working group that brings partners involved in social prescribing together quarterly to develop a Brent approach to sharing knowledge, best practice and working together

on social prescribing. This will ensure there is greater shared understanding of all social prescribing opportunities in Brent to increase partners' ability to effectively meet residents' needs.

- **Recommendation 4:** It is recommended that the Brent Integrated Care Partnership develops a Brent approach to capture further activity data and develop an understanding of how resources are distributed. In order monitor behaviour change and the effectiveness of social prescribing in Brent. This approach should complement partners' respective reporting mechanisms and be used by all partners involved in social prescribing. This will further support the Brent Integrated Care Partnership to develop a joined-up approach to data collection amongst partners in the borough.
- **Recommendation 5:** It is recommended that social prescribing activities are reported quarterly to the Brent Integrated Care Partnership's Health Inequalities and Vaccinations Executive Group, to evaluate social prescribing activities for the borough. This will create greater consistency and alignment for social prescribing across the borough.

3.4 The Brent Integrated Care Partnership has provided a response to each of the five recommendations made by the Task Group, which is set out in Appendix 2. In its responses the Brent Integrated Care Partnership has provided an action plan which outlines the steps it will take to implement each recommendation.

4.0 Next Steps

4.1 If endorsed by Cabinet, the Brent Integrated Care Partnership will then lead the delivery of the actions, set out in its response to the Task Group's recommendations in Appendix 2.

4.2 If endorsed by Cabinet, it is planned that the Task Group's recommendations and the response to them from the Brent Integrated Care Partnership will be considered by the Brent Health and Wellbeing Board.

4.3 The Community and Wellbeing Scrutiny Committee will then monitor the implementation of the recommendations, with a progress update coming to the committee a year after the recommendations were confirmed.

5.0 Financial Implications

5.1 It is possible that recommendations made by the Task Group, if accepted and implemented may have financial implications for the local authority and/or local NHS organisations. £0.1 million from the public health grant has been identified to support the implementation of the recommendations made by the Social Prescribing Task Group. Costs to the council will be no more than £0.1m.

5.2 The Brent Integrated Care Partnership will seek other funding opportunities, including business cases for health funding to support an increase in socialprescribing.

6.0 Legal Implications

- 6.1 Section 9F, Part 1A of the Local Government Act 2000 (LGA 2000), (Overview and scrutiny committees: functions), requires that executive arrangements by a local authority must ensure that its overview and scrutiny committees have the power to make reports or recommendations to the authority or the executive with respect to the discharge of any functions which are or are not the responsibility of the executive, or on matters which affect the authority's area or the inhabitants of that area.
- 6.2 Section 9Fe, Part 1A LGA 2000 (Duty of authority or executive to respond to overview and scrutiny committee), requires that the authority or executive:
- (a) consider the report or recommendations,
 - (b) respond to the overview and scrutiny committee indicating what (if any) action the authority, or the executive, proposes to take,
 - (c) if the overview and scrutiny committee has published the report or recommendations, publish the response, within two months beginning with the date on which the authority or executive received the report or recommendations

7.0 Equality Implications

- 7.1 Under Section 149 of the Equality Act 2010, the Council has a duty when exercising their functions to have 'due regard' to the need to:
- a) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act.
 - b) advance equality of opportunity; and
 - c) foster good relations between those who share a "protected characteristic" and those who do not.
- 7.2 This is the Public Sector Equality Duty (PSED). The 'protected characteristics' are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, sex, and sexual orientation.
- 7.3 The recommendations of the Task Group are intended to reduce inequality in a number of protected characteristics by reducing health inequalities. Once implemented the Task Group's recommendations should enable social prescribing to further reduce inequality in Brent.

8.0 Consultation with Ward Members and Stakeholders

- 8.1 The Task Group's report was drawn up in consultation with Task Group members.



Social Prescribing in Brent

An Overview and Scrutiny Task Group Report

Chair, Councillor Ketan Sheth

Community and Wellbeing Scrutiny Committee

Members of the Task Group

Councillor Ketan Sheth (Chair)

Dr MC Patel*

Councillor Rajan-Seelan

Councillor Tazi Smith

Anita Thakkar*

*Denotes co-opted member

The task group was set up by members of Brent Council's Community and Wellbeing Scrutiny Committee on 22 September 2022.

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Chairs Foreword



Social prescribing is a non-traditional form of healthcare that uses a holistic approach that deals with residents as a whole person and supports patients to address non-medical factors such as poor-quality housing that may cause medical issues, such as mental ill health through non-medical support in the community. Social prescribing is still in its early stages of its development in England, and it was not until 2014 that the NHS recognised the range of benefits that social prescribing could have on its population's health at a national level. As social prescribing has developed in Brent its focus has had to adapt, with factors such as the 12 years of austerity and the cost-of-living crisis changing the support residents need in

the community. It was imagined that residents would be prescribed gym memberships and swimming classes through social prescribing, however, many residents who receive support from social prescribing in Brent are referred to welfare services, food banks and social care support. It is important to note that social prescribing operates within this context in Brent.

Social prescribing has been identified as being potentially key to addressing health inequalities across Brent, as residents who live in areas of high deprivation are more likely to have worse health outcomes due to socio-economic factors. To enable social prescribing to effectively tackle Brent's deeply entrenched health inequalities, its resources and funding must be distributed fairly, so that residents who are more likely to be impacted by health inequalities have sufficient opportunities to access the support they need.

"The key drivers of health inequalities are inequities in the conditions of daily life: the conditions in which people are born, grow, live, work and age. Action at the community level to address these is both necessary and feasible." – Sir Michael Marmot

The Task Group were encouraged by how social prescribing has developed in Brent so far. The Task Group hopes its findings and recommendations will assist in the development of social prescribing model for Brent that all residents can access fairly and makes a significant contribution to reducing health inequalities in Brent.

I would like to thank all the partners who participated in this process and gave up their time to come together for the benefit of our residents, your knowledge and contributions have been invaluable to the Task Group. I would finally like to thank my fellow Task Group members – Councillor Tazi Smith, Councillor Rajan-Seelan, Dr MC Patel and Anita Thakkar.

**Councillor Ketan Sheth,
Chair, Social Prescribing Scrutiny Task Group**

Recommendations

The Social Prescribing Task Group makes the following recommendations to the Brent Integrated Care Partnership (ICP). It is imagined that Brent Council's Cabinet will endorse any possible response to these recommendations as part of the executive response.

Recommendation 1: It is recommended that Brent's social prescribing model is widened from NHS primary care settings, to enable ICP partners, front line social care and selected front-line council staff to use social prescribing approaches. The Brent Integrated Care Partnership should lead in developing a social prescribing approach for Brent, where partners work together to ensure that all of Brent's residents have the opportunity to benefit from the holistic approach of social prescribing, as a way of further tackling health inequalities in the borough.

The Task Group recognises the good work in developing social prescribing in primary care and sees the benefits that using a holistic approach can have in improving health outcomes for Brent residents. However, it is known that there are Brent residents who are not registered with a GP and therefore cannot currently access social prescribing services. These residents may not be registered with a GP due to historical barriers to access for residents impacted by health inequalities, or because some Brent residents may be mistrustful of traditional health services.

The Task Group believes that the Brent Integrated Care Partnership should drive the development of a Brent social prescribing approach that is available to all Brent's residents. This would ensure every resident can benefit from the holistic approach used in social prescribing and would help to address the unmet health needs of residents who are currently excluded from accessing social prescribing. Existing health and social care staff within the Brent Integrated Care Partnership and staff in selected local authority 'access points' should be enabled to use social prescribing approaches in their work as part of the Brent social prescribing approach.

Recommendation 2: It is recommended that there is an equitable social prescribing offer across the borough that explicitly addresses deeply entrenched and intersectional health inequalities, listens to, and responds to communities, and ensures funding is allocated by areas of Brent with higher levels of deprivation.

The Task Group believes that social prescribing resources and funding should be weighted towards areas of Brent with higher levels of deprivation. Throughout the Task Group's work, partners have outlined that social prescribing is particularly important for residents living in areas with high levels of deprivation. The Task Group also recognises that residents living in areas of high deprivation are more likely to be impacted by health inequalities. It is therefore vital that these residents are supported

with sufficient resources, especially in the context of a cost-of-living crisis which is continuing to have a detrimental impact on the health of our deprived residents.

Social prescribing in primary care currently allocates resources based on GP practice need at a Primary Care Network (PCN) level. There is an opportunity for Brent's social prescribing approach to be developed so that it is guided by residents' needs and focuses its resources and funding in areas of the borough with higher levels of deprivation, where residents are more likely to be affected by health inequalities. Ensuring that the approach listens and responds to Brent residents is essential in developing an equitable social prescribing offer that tackles Brent's deeply entrenched health inequalities.

Recommendation 3: It is recommended that the Brent Integrated Care Partnership sponsors a social prescribing working group that brings partners involved in social prescribing together quarterly to develop a Brent approach to sharing knowledge, best practice and working together on social prescribing. This will ensure there is greater shared understanding of all social prescribing opportunities in Brent to increase partners' ability to effectively meet residents' needs.

The Task Group found that there is currently not a comprehensive, real-time picture of all the social prescribing opportunities in Brent. This issue is currently hindering the effectiveness of social prescribing in Brent as not all services are connected into NHS frameworks and social prescribing link workers do not have the time to proactively research opportunities in the community and voluntary sector, which means that suitable opportunities for residents could be missed.

The Task Group believes that in order to develop more joined up working and information sharing on social prescribing between partners, the Brent Integrated Care Partnership should take ownership of bringing partners involved in social prescribing together to share information on social prescribing opportunities, best practice and adopt a shared understanding of how partners will work together on social prescribing. This will foster better information sharing and develop a Brent approach to working together on social prescribing. This will improve residents' experience of social prescribing, giving partners more knowledge on support in the community to refer residents into, therefore enhancing Brent's social prescribing offer by making it more diverse, targeted and community specific.

Recommendation 4: It is recommended that the Brent Integrated Care Partnership develops a Brent approach to capture further activity data and develop an understanding of how resources are distributed. In order monitor behaviour change and the effectiveness of social prescribing in Brent. This approach should complement partners' respective reporting mechanisms and be used by all partners involved in social prescribing. This will further support

the Brent Integrated Care Partnership to develop a joined-up approach to data collection amongst partners in the borough.

The Task Group believe that issues around data collection and evaluation are the key challenge for social prescribing's development locally and nationally. To improve data evaluation there must be sufficient data collected on social prescribing activities in the borough, which would show how social prescribing is developing and allow partners to monitor how social prescribing is contributing to behaviour change in the borough.

The Task Group believe that the Brent Integrated Care Partnership should develop its own approach to collecting further data from all partners on social prescribing activities in Brent. Any further data collected by the Brent Integrated Care Partnership would be separate and additional to the reporting measures that already exist for separate partners. The ICP's additional data collection should complement partners' existing reporting measures and be a standalone measure that develops a shared view amongst partners. This further collection of data, driven by the ICP will develop a joined-up approach to data collection and give the ICP strategic oversight of how social prescribing is evolving and changing resident's behaviour.

Recommendation 5: It is recommended that social prescribing activities are reported quarterly to the Brent Integrated Care Partnership's Health Inequalities and Vaccinations Executive Group, to evaluate social prescribing activities for the borough. This will create greater consistency and alignment for social prescribing across the borough.

The Task Group consider a mechanism must be put in place which ensures social prescribing activities are reported across Brent. Currently there is no overall picture of how social prescribing is developing across the borough, which elevates risks of inconsistency in the social prescribing offer across the borough which could negatively impact residents. Reporting social prescribing activities into the Brent Borough Based Partnership (ICP) will allow the ICP to have strategic oversight of social prescribing's development in Brent, which will promote greater uniformity and alignment across the borough.

The Task Group believe that social prescribing activities should be reported into the ICP's Health Inequalities and Vaccinations Executive Group. The Task Group recognises that social prescribing is vital in areas with higher levels of deprivation, as it can play a significant role in improving health outcomes for Brent residents who are impacted by intersectional health inequalities. It is therefore logical that social prescribing activities should be reported into this executive group, so it can review the impact of social prescribing in reducing the deeply entrenched health inequalities that exist in Brent and the rest of the United Kingdom.

Introduction:

Social prescribing is an intervention in healthcare that allows healthcare professionals to refer patients onto a range of local, non-medical services in the community. It seeks to improve health outcomes by addressing a patient's wider issues that may contribute to their overall health. The organisations and activities residents are referred into through social prescribing are varied, some examples of referrals in Brent include to Brent Citizens Advice, dementia support groups, and food banks. Social prescribing uses a person-centred, holistic approach to treating patients, that looks at the whole person to understand possible non-medical issues that contribute to an individual's medical condition. For example, a patient may go to their GP with symptoms of depression; instead of prescribing anti-depressants, the social prescribing approach will look at the non-medical issues that could be contributing to their symptoms such as welfare issues or poor-quality housing. Whilst there are different social prescribing models, a typical social prescribing scheme has three key components: (i) a referral from a healthcare professional, (ii) a social prescriber (link worker), and (iii) a range of local opportunities in the community and voluntary sector that a patient can be referred into.¹

Social prescribing approaches are not new, since the 1990s schemes have been practiced in the NHS, and the pioneering Bromley by Bow Centre was established in 1984.² However, until 2014 social prescribing largely went unnoticed by the NHS at a national level. It was research that was influential in putting social prescribing on the national agenda. The Foresight Capital and Wellbeing Project found that positive mental health and wellbeing was associated with social and economic factors, such as education and social connectivity³. The Marmot review of 2010 highlighted the social determinants of health inequality, which meant that wealth, geography and race have an impact on a person's physical health⁴. Furthermore, The World Health Organisation found that stress, unemployment, debt, loneliness, lack of education and support in early childhood, insecure housing and discrimination can impact 30-55% of the health outcomes people experience.⁵ Research on the impact of social determinants of health have highlighted the positive impact that social prescribing approaches could have on a population's overall health.

Since 2014 national NHS bodies have committed resources to its national development, multiple NHS forward views have placed an emphasis on the role the community and voluntary sector could play alongside GP services in offering patients community-based support. The NHS long-term plan (2019) incorporated social

¹ University of Westminster (2017), Making Sense of Social Prescribing

² The Kings Fund (2020), What is Social Prescribing?

³ Foresight Mental Capital and Wellbeing Project. (2008). Mental capital and wellbeing: Making the most of ourselves in the 21st century

⁴ Michael Marmot (2010) Fair society, healthy lives: Strategic review of health inequalities in England post-2010.

⁵ NHS England (2022), Social prescribing as a way of tackling health inequalities in all health settings

prescribing into its comprehensive model of personalised care, as part of this Primary Care Networks with a population of over 30,000 people were reimbursed for the costs of employing a social prescribing link worker.⁶ This was instrumental in advancing social prescribing, and it is estimated that there were 2,264 link workers in post nationally in March 2022.⁷

The Social Prescribing Task Group was established in September 2022 to conduct an in-depth review of how social prescribing has been implemented in Brent so far and to evaluate the options for its future development. This was relevant and timely given the move towards further integration of health and social care as a result of the Health and Care Act of 2022⁸, which led to Integrated Care Systems (ICS) being formalised as legal entities with statutory powers and responsibilities. These ICS' focus on places and local populations as the driving forces for improvement in health services.⁹ A review of social prescribing was therefore considered as it would give the Task Group an opportunity to positively influence the development of social prescribing in the borough in a period of further integration of health and social care.

Task Group Membership

The Task Group was comprised of the following members:

- Councillor Ketan Sheth (Chair)
- Dr MC Patel*
- Councillor Rajan-Seelan
- Councillor Tazi Smith
- Anita Thakkar*

*Co-opted member

Task Group Terms of Reference

The following Terms of Reference for the Task Group were agreed at the 22 September 2022 meeting of the Community and Wellbeing Scrutiny Committee:

- i) To review Brent's current social prescribing offer, including both the infrastructure and attitude to social prescribing and evaluate whether Brent is fully realising the potential benefits of social prescribing.
- ii) To understand the opportunities for social prescribing in Brent and what can be achieved through social prescribing locally for all residents.
- iii) To consider the most effective ways of further developing social prescribing in Brent in collaboration with the NHS and other partners.

⁶ The Kings Fund (2020), What is Social Prescribing?

⁷ The Nuffield Trust (2022), How many social prescribing link workers are there in England?

⁸ Department of Health and Social Care, Health and Care Act 2022

⁹ The Kings Fund (2022), Integrated care systems explained

Methodology

As part of its work the Task Group has collected both quantitative and qualitative evidence which has contributed to the Task Group's report and its recommendations. Between October and December 2022, the Task Group carried out a number of evidence sessions with partners involved in social prescribing. The Task Group thanks all those who contributed to the sessions, a full list of those who participated is included in Appendix A.

The Task Group Members carried out four evidence sessions, during these sessions the task group questioned expert witnesses on issues related to social prescribing in Brent. More detail on the content of these sessions is included in Appendix B. In addition to the information gathered at evidence sessions, the Task Group also requested both qualitative and quantitative data from a number of partners.

The Task Group has developed its recommendations in line with existing local authority scrutiny legislation. Whilst the Task Group recognises that a local authority executive or external body is not compelled to act on a recommendation, a local authority executive must respond within two months and NHS organisations are expected to give a meaningful response within 28 days of recommendations being agreed by a scrutiny committee.¹⁰

Background:

Social Prescribing in Brent

Much like the rest of England, Brent developed social prescribing arrangements following the commitment of resource to its national roll out by the NHS nationally. Currently social prescribing is delivered as an intervention in primary care, where social prescribing link workers work as part of a multi-disciplinary team within a GP practice. Social prescribing has been located in primary care for multiple reasons, and because one in five GP appointments relate to issues wider than health,¹¹ social prescribing link workers are well placed in primary care to support patients who have issues that are broader than healthcare alone. Link workers use a person-centred, holistic approach, which involves supporting a patient over an extended period of time to build rapport and trust. This allows a patient to develop confidence and openness with their link worker, which in turn enables the link worker to refer the patient onto the most appropriate support in the community. Using this holistic approach over an extended period of time is the key asset of social prescribing, which can effectively address non-medical issues that contribute to a person's overall health.

Social prescribing has also been used as a way of managing demands on GP practices, given the significant demands and pressures on the health service in 2022,

¹⁰ Department of Health (2014), Local Authority Health Scrutiny

¹¹ NHS England (2022), Social prescribing as a way of tackling health inequalities in all health settings

social prescribing link workers taking on some patients who have non-medical issues that are contributing to their ill-health reduces pressure on clinicians. This in turn allows clinicians to see more patients who require traditional medical interventions.

Social prescribing link workers have a significant impact within primary care, an example of their role and impact is outlined by a Brent GP Partner below:

The Social Prescribing Link Workers offer a monumental holistic support service for our patients. We have a very high prevalence of patients facing major health inequalities, severe deprivation with underlying major social and welfare challenges, including benefits, housing, relationship, cultural and social problems. Many patients are facing extreme cost of living problems and cannot afford to “heat and eat” or make basic healthy food and medical choices. As a result, this leads to major medical/health problems including poor nutrition with health and wellbeing lifestyle challenges, weight problems with earlier onset and prevalence of chronic disease conditions e.g., Type II Diabetes Mellitus, Hypertension, Serious Mental Health problems and worsening complications. The Social Prescribing Link Workers offer an incredible practical support towards tackling some of the mountain of problems faced. As a result, patients report huge benefit in having a service that can help signpost and direct them towards improving their health, wellbeing, financial, social and lifestyle situation.

In Brent social prescribing is currently delivered differently to residents depending on which Primary Care Network (PCN) their GP practice is part of. A Primary Care Network is a group of GP practices that work together to enable residents to receive more proactive health and social care close to their homes.¹² Brent has 7 Primary Care Networks; the practices within each PCN are reflected in Table 1. Harness North and South and K&W PCN areas commission Brent Mencap to deliver social prescribing in their GP practices, whereas the Kilburn Partnership PCN has its own arrangements for social prescribing.

Table 1: Brent Primary Care Networks and Practices¹³

PCN Area	GP Practice
Harness South	Forty Willows Surgery
	Church End Medical Centre
	The Stonebridge Practice
	Brentfield Medical Centre
	Freuchen Medical Centre
	Oxgate Gardens Surgery

¹² NHS England, Primary Care Networks

¹³ NHS Digital (2023), Patients Registered at a GP Practice – January 2023: Mapping (Commissioning Regions – ICBs-SICBLs-PCNs-GP Practice)

	Walm Lane Surgery
	Hilltop Medical Practice
	Park Royal Medical Practice
	Roundwood Park Medical Centre
Harness North	Willow Tree Family Doctors
	Preston Hill Surgery
	Church Lane Surgery
	Lanfranc Medical Centre
	The Sunflower Medical Centre
	The Surgery
	Preston Medical Centre
	Pearl Medical Practice
	Wembley Park Drive Medical Centre
Kilburn Partnership	Sms Medical Practice
	Mapesbury Medical Group
	Kilburn Park Medical Centre
	Staverton Surgery
K&W North	Chichele Road Surgery
	Uxendon Crescent Surgery
	Jai Medical Centre (Brent)
	The Fryent Way Surgery
	Brampton Health Centre
	Kingsbury Health And Wellbeing
	Neasden Medical Centre
K&W South	Kings Edge Medical Centre
	St Andrews Medical Centre
	The Willesden Medical Centre
	The Lonsdale Medical Centre
	Gladstone Medical Centre
	Willesden Green Surgery
	St. Georges Medical Centre
K&W Central	Burnley Practice
	Ellis Practice
	Chalkhill Family Practice
	Preston Road Surgery
	The Tudor House Medical Centre
K&W West	Sudbury Surgery
	Premier Medical Centre
	The Law Medical Group Practice
	Sudbury & Alperton Medical Centre
	Stanley Corner Medical Centre
	Lancelot Medical Centre
	Hazeldene Medical Centre
	Alperton Medical Centre
	The Wembley Practice

There are currently 32 social prescribing link workers who work across Brent's 51 GP practices.¹⁴ Primary Care Networks are responsible for deciding which GP practices social prescribers are allocated to and the amount of time each practice is allocated with a social prescribing link worker. As social prescribing continues to develop in Brent there has been an increase in the number of referrals made by social prescribers across Brent. Harness North and South PCNs reported 2512 social prescribing referrals in 2021-22, which was a significant increase from the 1,575 referrals made in 2020-21. Kilburn partnership PCN collects data on social prescribing differently to other PCNs in Brent, however the PCNs four practices supported 524 patients through

¹⁴ Evidence session 2

social prescribing from January to October 2022¹⁵. Whilst this increase may have been influenced by the Covid-19 pandemic in 2020-2021, or population growth in Brent, there is evidence that demand for social prescribing services across the borough is increasing. Due to the nature of social prescribing, for each referral a patient is typically contacted 5 times by their link worker, and if a referral is related to mental health support, social care, housing or welfare benefits link workers will often contact a patient between 8-10 times to ensure they receive appropriate support.

The other aspect of a social prescribing link worker's role is to connect patients with appropriate support in the community. These community led interventions are key in mobilising the power of communities to generate positive health outcomes for local people. Given Brent is one of London's most diverse boroughs it is important that there are culturally specific, diverse and targeted opportunities to refer residents into; otherwise, there is a risk that residents may not receive the most appropriate support in the community. A case study of a typical social prescribing referral in primary care is outlined below.

Case Study: Example of casework undertaken by a social prescribing link worker

Patient A, 57 was referred for social prescribing by his GP as they were struggling to get the right support. On the first initial assessment the social prescribing link worker listened to the patient talk about how they were feeling and why they were struggling. The patient stated that they were going through a difficult time for last few months and had been misusing drugs and alcohol and was gambling for some time. This resulted in that patient accumulating debts of £45,000. This debt issue was giving the patient severe anxiety and struggles with their mental health. The social prescribing link worker discussed different options with the patient to address their debt, alcohol and gambling issues. The patient initially declined the offer to be referred to a gambling clinic, however, on the third appointment the patient agreed, and the referral was made. The patient was also referred to other support services and was given medication by their GP to help with their anxiety. The patient agreed to be referred to Step Change - a debt advice service. Currently the patient is in work and is trying to pay off their debt. They were given advice on how to deal with debt and put in touch with the right services to help them repay their debt in instalments and create a budget plan. When the social prescribing link worker follows up with the patient, they check that they are coping well and feeds information back to the practice if required. If any further referrals are needed this will be done, with any clinical concerns being raised with their GP.

¹⁵ Kilburn Partnership PCN (2022), Social prescriber feedback

Brent is fortunate to have a thriving community and voluntary sector that provides a range of support for residents across the borough. The diverse range of social prescribing opportunities allows for residents to be referred into community specific and diverse opportunities. An outline of the type of services social prescribing link workers refer into is provided in Figure 3:

Figure 3: Services/organisations referred to by Harness and K&W Social Prescribing Link Workers (April 2022-Nov 22)

Service/organisation referred into:	Number of referrals
Social Services (Care needs assessment, Occupational Health etc)	471
Other Brent Council services (Housing, family wellbeing centre, SEND support, Benefits and Council tax department, Transport etc):	312
IAPT – Improving Access to Psychological Therapies	387
Citizens Advice Brent	325
Brent Hubs	194
Advice for Renters	132
Ashford Place	170
Brent Carers Centre	52
Brent Bereavement Services	47
Brent Mencap	43
Mental Health Services	94
Brent Single Point of Access (SPA)	58
Domestic abuse support services	49
Age UK Brent	86
Elders Voice	112
Cancer support services	54
Other support groups / societies (such as MS Society, Community Action on Dementia etc)	61
AJM Healthcare - Wheelchair services in Brent	45
Thames Reach (Brent Reach)	37
Shaw trust (Employment Services)	49
Twinnings (Employment Services)	52
Hestia (Employment Services)	23
Other employment supply services	17
Sufra NW London	131
Other food banks	61
Brent libraries	56
Community specific groups (Asian Women's resource, Brent Irish Advisory Services, Brent Somali Community Centre)	97

Brent's population & health profile

Brent is the 5th largest London borough by population, which was estimated to be 339,800 people in 2021,¹⁶ its population is also growing more rapidly than the London and national average, increasing by 9.2% since 2011.¹⁷ It is expected that Brent's

¹⁶ Office for National Statistics, How life has changed in Brent: Census 2021

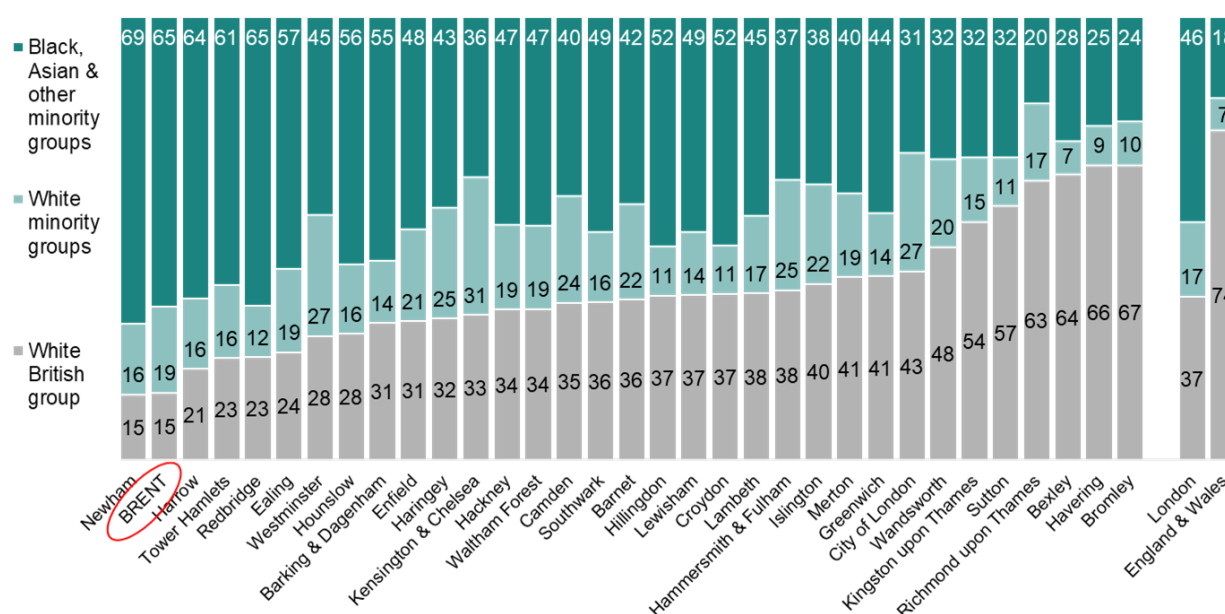
¹⁷ ibid

population will continue to rise by another 17% between 2020 and 2041.¹⁸ This growth in population is set to place greater demands on Brent's health and social care system. In January 2023, 463,894 people were registered with a Brent GP practice¹⁹, which gives an indication of current demands on Brent's primary care system.

In Brent males have a life expectancy of 80.4, whereas women's life expectancy is 85.0, this is higher than the national average of 79.0 years for males and 82.9 years for females.²⁰ Brent's Health Life Expectancy figure, which is the number of years a baby would expect to live in a state of 'good' general health was 64.0 years for males and 68.6 for females; higher than London averages of 63.8 for males and 65.0 for females. Whilst this data suggests that Brent's general population is in good health, the local authority knows that there are specific groups of residents who are more likely to have poorer health outcomes and therefore require specific attention and intervention.

Brent has one of the most ethnically diverse populations in the country, the majority of its population (85%) are from ethnically diverse groups, and it has the second highest percentage of BAME residents in London, as highlighted in Figure 4.

Figure 4: Population by ethnicity, London Boroughs & the City, 2021



Brent Council recognises that its diversity is one of its key strengths, however it also acknowledges that its residents are more likely to be impacted by health inequalities as a result. Health inequalities are avoidable, and unfair, systematic differences in how groups of people access and experience healthcare. It has been found that a person's ethnic background can impact on their access and experience of healthcare, or cause differences in behavioural risks to health such as smoking, or

¹⁸ Brent Council (2021), Population Change in Brent

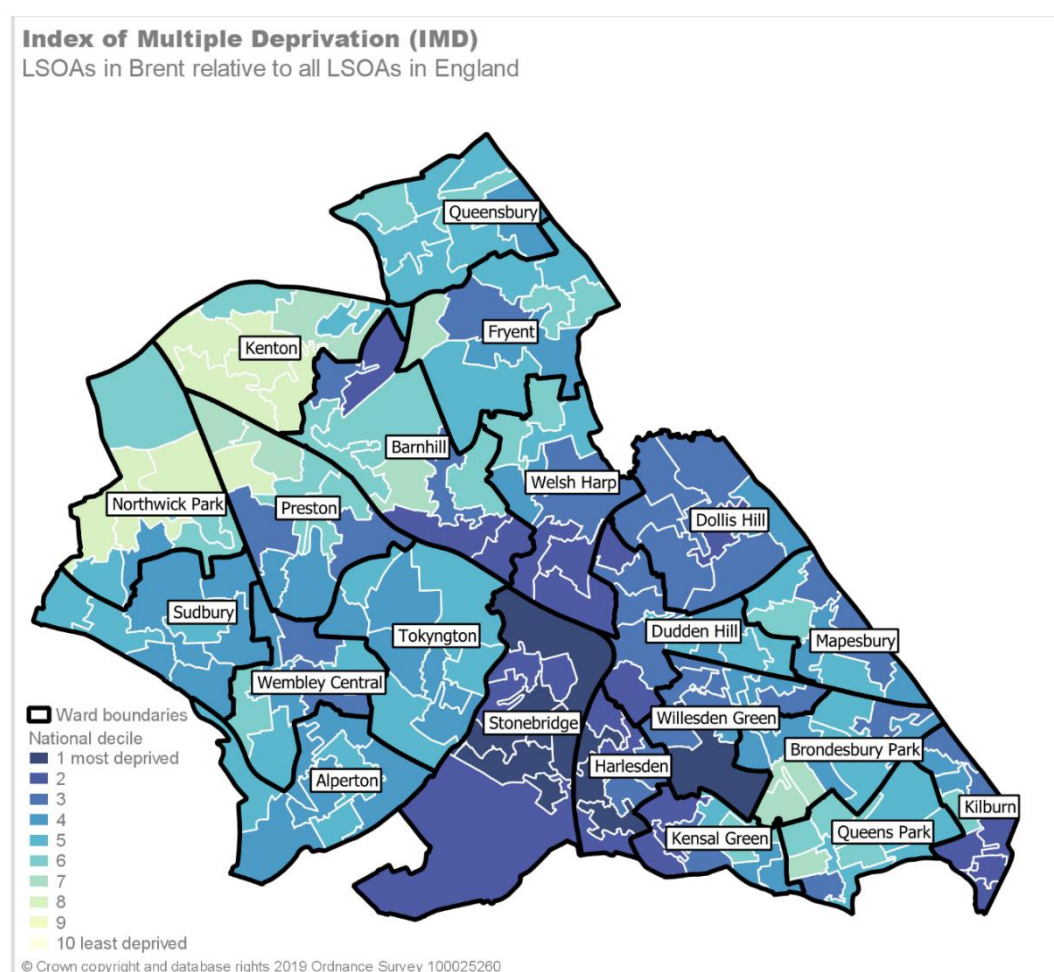
¹⁹ NHS NW London (2022), Number of people registered with a Brent GP

²⁰ Office for National Statistics (2021), National life tables – life expectancy in the UK: 2018 to 2020

their wider determinants of health such as housing, education and employment.²¹ The impact of health inequalities on Brent's ethnic communities was highlighted by the Covid-19 pandemic, which saw deprived and ethnic communities overrepresented in Covid-19 mortality rates. Brent Council are proactively addressing health inequalities through its Brent Health Matters programme which works with and in Brent's communities to improve health outcomes for communities impacted by health inequalities. In order for social prescribing to effectively address health inequalities, the community interventions that residents are referred into must be diverse, culturally appropriate and reflect the needs of Brent's diverse population.

Brent is also home to some of England's most deprived communities. According to the 2019 Indices of Deprivation, the most recent measure of deprivation nationally, Brent was the 79th most deprived local authority in England out of 317. However, as shown in Figure 5, Brent has a number of Lower layer Super Output Areas (LSOAs) that are in the most deprived percentile. These areas of high deprivation are concentrated in Stonebridge, Harlesden and Kilburn, and one area in Stonebridge is in the top 5% of the most deprived LSOAs in England. This shows that there are significant levels of deprivation within the borough, and it is likely that deprivation has increased since

Figure 5: Brent Index of Multiple Deprivation Map by Pre-2022 Wards



²¹ The Kings Fund (2022), What are health inequalities?

2019, with the cost-of-living crisis impacting significant numbers of the borough's residents.

Research has shown there is a strong relationship between socio-economic factors and health outcomes. The findings of the Marmot Review (2010) were key in highlighting the impact that social factors such as welfare, and housing can have on health outcomes. Socio-economic factors are also key sources of health inequalities, in England the least deprived 10% of men have a life expectancy that is 9.4 years higher life expectancy than the most deprived 10% of men, for women this figure is almost 8 years.²² There are a number of socio-economic issues in Brent that could be contributing to poorer health outcomes for residents. Firstly Brent, like much of London is experiencing significant issues with housing supply, overcrowding and affordability of housing²³. It has been shown that poor quality housing can have a negative impact on health outcomes, leading to residents requiring medication for mental health issues, poor sleep, and increases in depression and stress. Rising energy and food costs as a result of the cost-of-living crisis is also negatively impacting Brent resident's health, with many residents not eating enough nutritious food and not being able to stay warm in their homes. The cost-of-living crisis' impact on the population's health is not yet widely known, though it is likely to have a significantly damaging impact on health outcomes for many residents. This is why social prescribing is particularly important in areas with high levels of deprivation, where residents are more likely to present to GPs with welfare, or housing issues that are contributing to their overall ill health. It is therefore important that social prescribing is developed so that Brent's most vulnerable residents are able to access support through social prescribing.

²² The Kings Fund (2022), What are health inequalities?

²³ Brent Council (2020), Recommendations from the Brent Poverty Commission

Findings

Extending access to social prescribing:

As stated previously social prescribing is currently being delivered in primary care settings in Brent, with a social prescribing scheme consisting of a referral from a GP to a link worker who refers the patient onto non-clinical community services. Whilst primary care patients are benefitting from the holistic person-centred approach of social prescribing, having a solely primary care model reduces the potential impact social prescribing could have for Brent residents. It is argued that a primary care model of social prescribing is not sufficient for Brent as it only allows residents who are registered to a Brent GP to access these services,²⁴ excluding residents who are not registered with a Brent GP. The exact number of Brent residents who are not registered with a Brent GP is not recorded, however as of January 2023 463,894²⁵ people were registered with a Brent GP, a higher figure than the Census' estimate of Brent's population in 2021 of 339,800.²⁶ A number of factors could account for this, such as residents from other boroughs registering with Brent GPs and population underestimates in London during the 2021 Census²⁷. However, ultimately there are still significant numbers of residents in Brent who are excluded from social prescribing.

Whilst there are multiple reasons why a resident may not register with a GP, the work undertaken in the community by the council's Brent Health Matters programme found there are Brent residents who mistrust Brent's health services, which prevents them from accessing healthcare. Brent Health Matters' work found that some residents who mistrust health services are also more likely to be impacted by health inequalities. It is therefore even more important that these residents can access social prescribing opportunities that are culturally specific and diverse as part of Brent's approach to tackling health inequalities.

The Task Group believes that the Brent Integrated Care Partnership should lead the development of a social prescribing approach for Brent that could be used by all partners involved in social prescribing. As part of this approach, it is important that any widening of social prescribing compliments and supports the excellent ongoing work in primary care. The social prescribing offer in primary care is distinct as link workers can raise any clinical needs back to the patient's GP. Therefore, a widening of social prescribing should focus on supporting residents who are not registered with a GP and require non-clinical support. The local authority knows that these residents go elsewhere to access support within various settings or 'access points' in the borough, so, there is a key opportunity to extend social prescribing into these 'access points' so residents who are not registered with a GP can also benefit from social prescribing. The Brent Integrated Care Partnership believes that ICP partners and health and social care staff should be enabled to practice social prescribing approaches as part

²⁴ Evidence session 2

²⁵ NHS NW London (2022), Number of people registered with a Brent GP

²⁶ Office for National Statistics (2022), How the population changed in Brent: Census 2021

²⁷ The MJ (2022), Inaccurate Census could cost Londoners

of their work, and within the local authority the Adult Social Care Front Door, Family Wellbeing Centres and Brent Hubs have been identified as key 'access points' where social prescribing should be extended to meet the needs of residents who are not registered with a Brent GP. As part of the development of a Brent social prescribing approach partners should work together to ensure that all residents have the opportunity to benefit from social prescribing.

Depending on how social prescribing develops there is also an opportunity in the future to build social prescribing approaches into other council services, such as customer services and libraries, it is also possible to consider extending social prescribing approaches into softer 'access points' such as community and faith groups, which could address a different group of residents' support needs through social prescribing approaches.

Recommendation 1:

Recommendation 1: It is recommended that Brent's social prescribing model is widened from NHS primary care settings, to enable ICP partners, front line social care and selected front-line council staff to use social prescribing approaches. The Brent Integrated Care Partnership should lead in developing a social prescribing approach for Brent, where partners work together to ensure that all of Brent's residents have the opportunity to benefit from the holistic approach of social prescribing, as a way of further tackling health inequalities in the borough.

The Task Group recognises the good work in developing social prescribing in primary care and sees the benefits that using a holistic approach can have in improving health outcomes for Brent residents. However, it is known that there are Brent residents who are not registered with a GP and therefore cannot currently access social prescribing services. These residents may not be registered with a GP due to historical barriers to access for residents impacted by health inequalities, or because some Brent residents may be mistrustful of traditional health services.

The Task Group believes that the Brent Integrated Care Partnership should drive the development of a Brent social prescribing approach that is available to all Brent's residents. This would ensure every resident can benefit from the holistic approach used in social prescribing and would help to address the unmet health needs of residents who are currently excluded from accessing social prescribing. Existing health and social care staff within the Brent Integrated Care Partnership and staff in selected local authority 'access points' should be enabled to use social prescribing approaches in their work as part of the Brent social prescribing approach.

Developing an equitable social prescribing offer

Social prescribing as an intervention in healthcare seeks to address a person's non-medical issues that contribute to a person's overall health. Therefore, its ability to make an impact is increased in areas with higher levels of deprivation, as these residents are more likely to need support with welfare and housing. As indicated in the above IMD, Brent has a number of areas with significantly high levels of deprivation; for residents in these areas, it is important that there are sufficient opportunities to access social prescribing services. Furthermore, the significant health inequalities in Brent have highlighted the need for healthcare interventions that are community specific, targeted and diverse for Brent's communities. As health inequalities are often intersectional, residents who experience health inequalities due to their ethnic background are also more likely to be affected by deprivation, which further highlights how vital effective social prescribing approaches are for Brent's communities. It is likely that even more Brent residents will require support as a result of the cost-of-living crisis, so partners must ensure that there is sufficient resource allocated to effectively support these residents.

Currently the ability to make social prescribing referrals is dependent on the availability of a link worker at a GP practice in the primary care model. The time each GP practice is allocated with a social prescribing link worker is decided at Primary Care Network level and is currently being allocated based on needs of the practice. There are currently 32 social prescribing link workers in Brent who work within its 51 GP practices. It is clear that there are large demands on social prescribing link workers which are expected to increase as social prescribing continues to develop. An increased demand on social prescribing link workers could therefore hinder PCNs ability to provide sufficient social prescribing resources to GP practices in areas of high deprivation, as social prescribing is impacted by the same funding and workforce pressures as the rest of the health and social care sector.

To ensure that social prescribing is effective in addressing health inequalities it is important that resources and funding are allocated equitably so residents who are most in need can access adequate support. Partners know that deprived residents and those impacted by health inequalities are the residents who need this holistic and person-centred support the most and will have the most significant positive impact on their health. It is therefore important that social prescribing resources are allocated equitably across Brent and focus attention in areas with the greatest need. NHS guidance on Network Contract Directed Enhanced Service (Network DES) has outlined guidance on promoting proactive social prescribing through community development.²⁸ It is stated that by 31 March 2023 PCNs must design and put in place a targeted programme to improve access for an identified cohort with unmet needs. This means it must review which residents are part of this cohort and extend the offer of social prescribing based on the cohorts needs.²⁹ As part of this work in primary care,

²⁸ NHS England (2022), Network Contract Directed Enhanced Service

²⁹ NHS England (2022), Network Contract Directed Enhanced Service

there is an opportunity for the Brent's social prescribing approach to be informed by the findings of this piece of work in primary care. This will assist the Brent social prescribing approach in focusing its efforts and resources in areas of Brent with high levels of deprivation, where residents may have unmet needs. The Task Group believe that the Brent social prescribing approach must be more proactive in listening and responding to Brent's communities when allocating funding and resources, which could be implemented through consultations, community engagement and proactive analysis of demographic information to ensure the social prescribing approach adapts as Brent changes. This would be influential in ensuring there is an equitable social prescribing offer across the borough that meets the needs of residents and address the health inequalities faced by Brent's communities.

Recommendation 2:

It is recommended that there is an equitable social prescribing offer across the borough that explicitly addresses deeply entrenched and intersectional health inequalities, that listens and responds to communities, and ensures funding is allocated by areas of Brent with higher levels of deprivation.

The Task Group believes that social prescribing resources and funding should be weighted towards areas of Brent with higher levels of deprivation. Throughout the Task Group's work partners have outlined that social prescribing is particularly important for residents living in areas with high levels of deprivation. The Task Group also know that residents living in areas of high deprivation are more likely to be impacted by health inequalities. It is therefore vital that these residents are supported by sufficient resources, especially in the context of a cost-of-living crisis which is continuing to have a detrimental impact on the health of our deprived residents.

Social prescribing in primary care currently allocates resources based on GP practice need at PCN level. There is an opportunity for Brent's social prescribing approach to be developed so that it is guided by residents' needs and focuses its resources and funding for in areas of the borough with higher levels of deprivation, where residents are more likely to be affected by health inequalities. Ensuring that the approach listens and responds to Brent residents' is essential in developing an equitable social prescribing offer that tackles Brent's deeply entrenched health inequalities.

Developing more joined up working between partners involved in social prescribing:

The Task Group found that there is an opportunity to develop more joined up working between partners involved in social prescribing. Partners identified an issue that the

opportunities in Brent's community and voluntary sector are not always being fully utilised by existing social prescribers. A number of issues could be contributing to this, including a lack of local knowledge amongst some social prescribers, which hinders their ability to learn and acquire knowledge of new opportunities as they arise. This lack of knowledge is likely due to the fact that link workers have busy caseloads and spend the majority of their time with patients, which affects their ability to engage with the community and voluntary sector. Developing greater joined up working would give link workers an outlet to learn more about the opportunities in the community and voluntary sector and communicate gaps within the current offer that could be filled by developing new opportunities.

Brent Council officers also did not think that the local authority was utilising its services as well as it could be for social prescribing opportunities³⁰, they also questioned whether the council had been proactive enough in thinking about how its services could address current gaps in social prescribing opportunities³¹. There are also some services such as libraries, who are not currently connected to existing NHS frameworks. This hinders link workers' ability to make referrals into these services, which in turn limits link worker's ability to refer patients into diverse and community specific opportunities in the community. It is therefore important that the council works more proactively to connect its services with NHS systems to achieve better outcomes for residents.

In Brent, there have been some good examples of joined up working between Primary Care Networks and council services to share understanding and work more collaboratively; this has enabled link workers to navigate council services more effectively to better advocate for their patients. However, this is not currently standard practice in council services, so there is still work to be done to develop working relationships between partners involved in social prescribing. At the evidence sessions partners expressed a collective view that there is not a complete picture of all the social prescribing opportunities available in Brent. To address this, partners involved in social prescribing should come together to share knowledge on available social prescribing services and develop more joined up working to benefit Brent residents. In practice, the Brent Integrated Care Partnership could lead on bringing partners together by sponsoring a working group that meets to share knowledge on social prescribing opportunities and best practice, and develops a borough-wide approach to working together for Brent residents on social prescribing initiatives.

³⁰ Evidence Session 2

³¹ Evidence Session 2

Recommendation 3:

It is recommended that the Brent Integrated Care Partnership sponsors a social prescribing working group that bring partners involved in social prescribing together quarterly to develop a Brent approach to sharing knowledge, best practice and working together on social prescribing. This will ensure there is greater shared understanding of the numerous social prescribing opportunities in Brent and will increase partners' ability to effectively meet our resident's needs.

The Task Group found that there is currently not a comprehensive, real-time picture of all the social prescribing opportunities in Brent. This issue is currently hindering the effectiveness of social prescribing in Brent as not all services are connected into NHS frameworks and social prescribing link workers do not have the time to proactively research opportunities in the community and voluntary sector, which means that suitable opportunities for residents could be missed.

The Task Group believes that in order to develop more joined up working and information sharing on social prescribing between partners, the Brent Integrated Care Partnership should take ownership of bringing partners involved in social prescribing together to share information on social prescribing opportunities, best practice and adopt a shared understanding of how partners will work together on social prescribing. This will foster better information sharing and develop a Brent approach to working together on social prescribing. This will improve residents' experience of social prescribing, giving partners more knowledge on support in the community to refer residents into, therefore enhancing Brent's social prescribing offer by making it more diverse, targeted and community specific.

Improving data evaluation so that social prescribing develops in an evidence and needs based way

As social prescribing continues to develop nationally, there is a growing body of evidence that social prescribing can lead to a range of positive health and wellbeing outcomes.³² However, social prescribing continues to be constrained by limitations in its ability to evidence its positive outcomes. Whilst many patients benefit from social prescribing, it is very difficult to attach any improvements in a patient's wellbeing to the impact of social prescribing alone. This is because the methods of measuring outcomes are qualitative and require patients to self-report their outcomes which means that results of social prescribing is subjective and are harder to evidence than outcomes in traditional forms of medicine. Furthermore, a recent study by the

³² The Kings Fund (2020), What is Social Prescribing?

University of Westminster found that over half of the outcomes social prescribing can deliver are not being routinely measured in evaluation frameworks.³³

Social prescribing outcomes data in Brent is currently measured using the Office for National Statistics measures of personal wellbeing, often referred to as the ONS4³⁴. This measures a patient's personal wellbeing based on four questions, which are scored from 1-10. The four measures of personal wellbeing are outlined in Figure 6 below:

Next I would like to ask you four questions about your feelings on aspects of your life. There are no right or wrong answers. For each of these questions I'd like you to give an answer on a scale of 0 to 10, where 0 is "not at all" and 10 is "completely".	
Measure	Question
Life Satisfaction	Overall, how satisfied are you with your life nowadays?
Worthwhile	Overall, to what extent do you feel that the things you do in your life are worthwhile?
Happiness	Overall, how happy did you feel yesterday?
Anxiety	On a scale where 0 is "not at all anxious" and 10 is "completely anxious", overall, how anxious did you feel yesterday?

Figure 6: Four measures of personal well-being Source: Office for National Statistics

Patients are asked the ONS4 questions when they are first referred to a link worker and are then asked again once they have received their social prescribing intervention. The ONS4 data collected from Harness PCN areas indicate that on average a patients' personal wellbeing measures improve after a social prescribing intervention³⁵, and whilst this shows that social prescribing can improve a patient's wellbeing, it is impossible to attribute social prescribing as the only factor in any improvement. All four of the measures in the ONS4 are broad and can be influenced by external factors which may not be linear, for example, an improvement in a patient's ONS4 score for happiness could be due to them recently receiving good news that is unrelated to their social prescribing intervention. Therefore, whilst the overall improvement in ONS4 measures in the data from Harness PCNs is positive, using the ONS4 in isolation is not adequate in measuring social prescribing's impact.

It is therefore important that partners continue to develop and improve data collection and evaluation of social prescribing in Brent. It is essential as it gives partners insights on where social prescribing methods are working effectively and where it needs further development. For instance, Harness PCNs have identified that Arab patients and patients with disabilities are underrepresented in social prescribing data. They can use these insights to target and address this issue in current service provision. Therefore,

³³ University of Westminster (2020) What does successful social prescribing look like?

³⁴ Office for National Statistics (2018), Personal well-being user guidance

³⁵ ONS4 – Harness Data

improving data evaluation will positively impact health outcomes for Brent residents and would contribute to tackling health inequalities in the borough.

There are positive steps being taken to address issues with data evaluation at a North West London level, colleagues from the North West London Integrated Care System advised the Task Group that a new case management system called JOY has been procured which will enable social prescribing link workers to capture more patient data and provide a more comprehensive picture of social prescribing's outcomes in Brent³⁶. The new system is being trialled in Westminster, Ealing and Harrow and will be rolled out across North West London. Whilst this will improve case management and data collection, it has its limitations as it would only be available for colleagues in primary care.

The Task Group's view is that more must be done to ensure that social prescribing develops in an evidence and needs based way. During its evidence sessions the Task Group heard that data on social prescribing activities in Brent was not being fully captured³⁷, it also heard that there was not a culture of information sharing amongst partners on social prescribing which reduces its effectiveness in Brent. There is not currently a borough wide picture of social prescribing's activities and outcomes due partly to the different models of social prescribing used by different PCN areas. However, some of these issues may also be due to a lack of an information sharing culture regarding social prescribing across the borough.

To move towards capturing further data on social prescribing the Brent Integrated Care Partnership should develop a whole Brent approach for collecting additional data from all partners across the borough on social prescribing activities. Collecting further data will enable the Brent ICP to better understand how social prescribing is developing in the borough and monitor behaviour change as a result of social prescribing. This will be key in creating a more joined up approach to data collection and evaluation amongst partners, which will benefit Brent residents and the community as a whole. It is imperative that any approach developed for collecting additional data compliments partners' respective reporting measures and sits alongside them as an additional ICP reporting mechanism.

To further the impact of this approach partners involved in social prescribing should be required to report all of their activity data regularly to the Brent Integrated Care Partnership's Health Inequalities and Vaccinations Executive Group, this will develop greater alignment of social prescribing across the borough and provide the Brent ICP with strategic oversight of social prescribing's impact in reducing the deeply entrenched health inequalities in Brent.

³⁶ Evidence Session 1

³⁷ Evidence Session 4

Recommendation 4:

It is recommended that the Brent Integrated Care Partnership develops a Brent approach to capture further activity data and develop an understanding of how resources are distributed. In order monitor behaviour change and the effectiveness of social prescribing in Brent. This approach should complement partners' respective reporting mechanisms and be used by all partners involved in social prescribing. This will further support the Brent Integrated Care Partnership to develop a joined-up approach to data collection amongst partners in the borough.

The Task Group believe that issues around data collection and evaluation are the key challenge for social prescribing's development locally and nationally. To improve data evaluation there must be sufficient data collected on social prescribing activities in the borough, which would show how social prescribing is developing and allow partners to monitor how social prescribing is contributing to behaviour change in the borough.

The Task Group believe that the Brent Integrated Care Partnership should develop its own approach to collecting further data from all partners on social prescribing activities in Brent. Any further data collected by the Brent Integrated Care Partnership would be separate and additional to the reporting measures that already exist for separate partners. The ICP's additional data collection should complement partner's existing reporting measures and be a standalone measure that develops a shared view amongst partners. This further collection of data, driven by the ICP will develop a joined-up approach to data collection and give the ICP strategic oversight of how social prescribing is evolving and changing resident's behaviour.

Recommendation 5:

It is recommended that social prescribing activities are reported quarterly to the Brent Integrated Care Partnership's Health Inequalities and Vaccinations Executive Group, to evaluate social prescribing activities for the borough. This will create greater consistency and alignment for social prescribing across the borough.

The Task Group believe a mechanism must be put in place which ensures social prescribing activities are reported across Brent. Currently there no overall picture of how social prescribing is developing across the borough, which risks there being inconsistency in the social prescribing offer across the borough which could negatively impact residents. Reporting social prescribing activities into the Brent Borough Based Partnership (ICP) will give the ICP to have strategic oversight social prescribing's development in Brent, which will promote greater consistency and alignment across the borough.

The Task Group believe that social prescribing activities should be reported into the ICP's Health Inequalities and Vaccinations Executive Group, social prescribing is more important in areas with higher levels of deprivation as it can play a significant role in improving health outcomes for Brent residents who are impacted by intersectional health inequalities. It is therefore logical that social prescribing activities should be reported into this executive group, so that it can review the impact of social prescribing in reducing the deeply entrenched, intersectional health inequalities in Brent.

Appendices

Appendix A - Participants

The Task Group thanks the following participants who contributed to the report through their participation in evidence sessions held between October 2022 to December 2022:

- Tiffany Adonis- French - Head of Service - Access information and Long-Term Support, Brent Council
- Peter Baxter - Library Arts and Heritage Manager, Brent Council
- Mehrnoush Bakhasz - Team Manager: Social Prescribing Link Workers, Brent Mencap
- Dr Charlotte Benjamin - Chief Medical Officer, NHS North West London Integrated Care Board
- Yoel Berhane - Community Lead Brent Health Matters, Brent Council
- Germaine Brand - Managerial Lead – Kilburn Primary Care Network
- Claudia Brown – Director of Adult Social Services, Brent Council
- Thomas Cattermole - Director of Customer Access, Brent Council
- Laurence Coaker – Head of Housing Needs, Brent Council
- Caroline Evans - Senior Public Health Analyst – Brent Council
- Lorna Hughes - Director of Communities, Brent Council
- Fana Hussain - Assistant Director of Primary Care Brent Integrated Care Partnership
- Sophia Johnson, Citizens Advice Brent
- Caroline Kerby - Managerial Lead – Harness Primary Care Networks
- Cllr Promise Knight, Lead Member for Housing, Homelessness and Renters Security, Brent Council
- Dr John Liquorish – Deputy Director of Public Health – Brent Council
- Professor Sir Michael Marmot – University College London
- Anne-Marie Morris, Brent Carers Centre
- Ann O’Neil – Executive Director, Brent Mencap
- Cllr Neil Nerva, Lead Member for Adult Social Care and Public Health, Brent Council
- Joe Nguyen – North West London lead for social prescribing, NHS North West London
- Jackie Rosenberg – Chief Executive, One Westminster
- James Sanderson – NHS England
- David Sagman – Senior Social Prescriber, Kilburn Primary Care Network
- Javina Seghal – Director of Primary Care, NHS North West London
- Nipa Shah - Programme Director Brent Health Matters – Brent Council
- Tom Shakespeare - Brent Integrated Care Partnership Director
- Dr Melanie Smith - Director of Public Health, Brent Council
- Kristine Wellington, CVS Brent

Appendix B – Evidence Session Schedule

	Key Themes / Discussion Areas
Evidence Session 1 October 2022	Social prescribing and its expected benefits The national direction of travel for social prescribing How social prescribing is being delivered in Brent including the outcomes for delivery and patient pathways How developed social prescribing is in Brent in comparison to other NW London Boroughs The key health issues Brent seeks to address through social prescribing
Evidence Session 2 November 2022	The local opportunities for those who socially prescribe Primary care awareness and attitudes towards social prescribing Potential barriers to effective social prescribing for primary care professionals in Brent Equity in delivery of social prescribing in primary care across Brent Ensuring social prescribing is inclusive of vulnerable people, those with disabilities or complex needs Training and development of social prescribing link workers Funding of social prescribing in Brent
Evidence Session 3 November 2022	The local offer of social prescribing opportunities in Brent, including those provided by the local authority Benefits and opportunities for local organisations who receive social prescribing referrals Potential barriers to effective social prescribing in Brent for local organisations Potential barriers to involvement in social prescribing for organisations not currently receiving referrals How attractive and inclusive are social prescribing opportunities for Brent residents? (including vulnerable people and those with complex needs) Communication and awareness raising of social prescribing in Brent
Evidence Session 4	The role and effectiveness of link workers in connecting those who social prescribe with those who offer social prescribing opportunities

November 2022	<p>Assessing the patient pathway in social prescribing</p> <p>How well connected are different aspects of social prescribing</p> <p>How could stakeholders involved in social prescribing in Brent work together more effectively</p> <p>Evaluating and monitoring social prescribing's outcomes</p> <p>Developing social prescribing in Brent with partners to fully realise its potential</p>
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Executive Response to the Community and Wellbeing Scrutiny Committee

22 May 2023

On 7 March 2023, the Community and Wellbeing Scrutiny Committee agreed recommendations to the Brent Integrated Care Partnership with oversight from the Cabinet. The Executive Response from the Brent Integrated Care System and decisions against those recommendations are provided below.

Recommendation 1: It is recommended that Brent's social prescribing model is widened from NHS primary care settings, to enable ICP partners, front line social care and selected front-line council staff to use social prescribing approaches. The Brent Integrated Care Partnership should lead in developing a social prescribing approach for Brent, where partners work together to ensure that all of Brent's residents have the opportunity to benefit from the holistic approach of social prescribing, as a way of further tackling health inequalities in the borough

The Task Group recognises the good work in developing social prescribing in primary care and sees the benefits that using a holistic approach can have in improving health outcomes for Brent residents. However, it is known that there are Brent residents who are not registered with a GP and therefore cannot currently access social prescribing services. These residents may not be registered with a GP due to historical barriers to access for residents impacted by health inequalities, or because some Brent residents may be mistrustful of traditional health services.

The Task Group believes that the Brent Integrated Care Partnership should drive the development of a Brent social prescribing approach that is available to all Brent's residents. This would ensure every resident can benefit from the holistic approach used in social prescribing and would help to address the unmet health needs of residents who are currently excluded from accessing social prescribing. Existing health and social care staff within the Brent Integrated Care Partnership and staff in selected local authority 'access points' should be enabled to use social prescribing approaches in their work as part of the Brent social prescribing approach.

Executive Response:

The Brent Integrated Care Partnership welcome the Task Group's support for social prescribing.

Brent Health Matters will continue to work with public health and the borough primary care team to remove barriers to GP registration, which will promote more equitable access to the primary care social prescribing offer.

In addition, the ICP Executive agree that social prescribing is an effective intervention which should be utilised more widely by Council front line services, as a holistic approach to improving health outcomes with the potential to both promote independence and reduce demand for statutory services. We will therefore pilot the

introduction of social prescribing into ASC with a view to expanding this to other front-line services learning from this pilot.

Decision: Agreed

Actions:

- i). The Brent ICP Executive will establish a Social Prescribing Task and Finish Group and appoint a Programme Manager, funded through the public health grant, to oversee the development and implementation of an action plan in response to these recommendations. The Task and Finish Group will be chaired by the DPH and will report quarterly to the Brent Integrated Care Partnership's Health Inequalities and Vaccinations Executive Group (see recommendation 5)
- ii). Once the work programme has been agreed and is established, membership of the Social Prescribing Task and Finish Group will be reviewed as the Group should transition into an Oversight Group also reporting into Health Inequalities and Vaccinations Executive

Recommendation 2: It is recommended that there is an equitable social prescribing offer across the borough that explicitly addresses deeply entrenched and intersectional health inequalities, listens to, and responds to communities, and ensures funding is allocated by areas of Brent with higher levels of deprivation.

The Task Group believes that social prescribing resources and funding should be weighted towards areas of Brent with higher levels of deprivation. Throughout the Task Group's work, partners have outlined that social prescribing is particularly important for residents living in areas with high levels of deprivation. The Task Group also recognises that residents living in areas of high deprivation are more likely to be impacted by health inequalities. It is therefore vital that these residents are supported with sufficient resources, especially in the context of a cost-of-living crisis which is continuing to have a detrimental impact on the health of our deprived residents.

Social prescribing in primary care currently allocates resources based on GP practice need at a Primary Care Network (PCN) level. There is an opportunity for Brent's social prescribing approach to be developed so that it is guided by residents' needs and focuses its resources and funding in areas of the borough with higher levels of deprivation, where residents are more likely to be affected by health inequalities. Ensuring that the approach listens and responds to Brent residents is essential in developing an equitable social prescribing offer that tackles Brent's deeply entrenched health inequalities.

Executive Response:

Central to the local model of social prescribing is a focus on the wider determinants of health and the need to assess residents' needs holistically. The ICP Executive

recognises the potential for social prescribing to address health inequalities. To do so, resources and the social prescribing offer must be appropriately targeted and informed by community engagement. Involvement of Brent Health Matters and public health in the Task and Finish Group will allow qualitative understanding of community needs to inform the social prescribing offer. The development of monitoring of appropriate measures of activity and effectiveness (recommendation 4) will aid targeting. Improved consideration of and response to the wider determinants of health, including the cost-of-living crisis, will improve the effectiveness of social prescribing. To achieve this, improved links between existing social prescribers and Council provision including housing, resident support and the Hubs will be developed.

To date social prescribing in Brent has been funded by the Primary Care Networks and the PCNs retain authority over the use and distribution of their resources. However, the planned work will enable a better understanding of need and how this is being met which will allow for improved targeting of resources.

Additional investment from the public health grant has been identified to support the implementation of the response to Scrutiny's recommendations. This will support the expansion of social prescribing, including the commissioning of a Wellbeing service to develop and build upon those aspects of the current Gateway contract which address social isolation. Public health grant funding will support the inclusion of social prescribing into the ASC front line in the first instance. At the same time, opportunities will be sought for existing Council services, for example libraries and leisure, and for Council / NHS grant funded VSC services to be more open in their service offer to residents referred by social prescribers. In the first instance this will be explored within existing resources e.g. a community group seeking a BHM grant to run a community wellbeing activity will be encouraged to explain how social prescribers can refer and residents can participate.

The Task and Finish Group will seek other opportunities for funding including business cases for health funding to support an increase in social prescribing and the provision of more opportunities for social prescribing.

Decision: Agreed

Actions:

- i). Additional investment from the public health grant to be applied as above
- ii). Additional investment to be sought from the ICB
- iii). Any additional investment in social prescribing will be informed by considerations of equity

Recommendation 3: It is recommended that the Brent Integrated Care Partnership sponsors a social prescribing working group that brings partners involved in social prescribing together quarterly to develop a Brent approach to sharing knowledge, best practice and working together on social prescribing. This will ensure there is greater shared understanding of all social prescribing

opportunities in Brent to increase partners' ability to effectively meet residents' needs.

The Task Group found that there is currently not a comprehensive, real-time picture of all the social prescribing opportunities in Brent. This issue is currently hindering the effectiveness of social prescribing in Brent as not all services are connected into NHS frameworks and social prescribing link workers do not have the time to proactively research opportunities in the community and voluntary sector, which means that suitable opportunities for residents could be missed.

The Task Group believes that in order to develop more joined up working and information sharing on social prescribing between partners, the Brent Integrated Care Partnership should take ownership of bringing partners involved in social prescribing together to share information on social prescribing opportunities, best practice and adopt a shared understanding of how partners will work together on social prescribing. This will foster better information sharing and develop a Brent approach to working together on social prescribing. This will improve residents' experience of social prescribing, giving partners more knowledge on support in the community to refer residents into, therefore enhancing Brent's social prescribing offer by making it more diverse, targeted and community specific.

Executive Response:

The ICP Executive agree with the need for improved sharing of knowledge and good practice and more integrated working between social prescribing link workers, Council services and the voluntary and community sector. We agree that the ICP should take responsibility for bringing partners together to achieve this.

Having considered how to achieve this, we are not persuaded that establishing a working group will be sufficient to achieve this. We believe the following will also be necessary:

- A data base of "social prescribing opportunities" i.e. those services and organisations to which residents could be referred or signposted, these will include VCS and statutory services
- An improved and agreed understanding of (2 way) referral / signposting routes between social prescribers and Council / NHS services
- The creation of a Brent Social Prescribing Community of Practice to meet regularly to share learning and build relationships

Decision: Amended as per the actions below

Actions:

- i). Brent Health Matters working with the Integrated Neighbourhood Teams and the SPLW will establish and maintain a database of social prescribing opportunities
- ii). The Social Prescribing Task and Finish Group will support systems mapping to plot referral / signposting routes between social prescribers and Council / NHS

services and to clarify the respective offers and responsibilities the Programme Manager will lead on this

- iii). All Council departments will identify social prescribing opportunities within their services, provide information on these to the data base and ensure this information is reviewed / updated at least quarterly
- iv). The Council and the NHS will explore the feasibility of requiring grant recipients in the VSC and community to identify social prescribing opportunities within their offer, to provide information on these to the data base and ensure this information is reviewed / updated at least quarterly
- v). The provision of social prescribing opportunities will be included as a potential social value measure in Council contracts.
- vi). The creation of a Brent Social Prescribing Community of Practice to share good practice and develop networks

Recommendation 4: It is recommended that the Brent Integrated Care Partnership develops a Brent approach to capture further activity data and develop an understanding of how resources are distributed. In order monitor behaviour change and the effectiveness of social prescribing in Brent. This approach should complement partners' respective reporting mechanisms and be used by all partners involved in social prescribing. This will further support the Brent Integrated Care Partnership to develop a joined-up approach to data collection amongst partners in the borough.

The Task Group believe that issues around data collection and evaluation are the key challenge for social prescribing's development locally and nationally. To improve data evaluation there must be sufficient data collected on social prescribing activities in the borough, which would show how social prescribing is developing and allow partners to monitor how social prescribing is contributing to behaviour change in the borough. The Task Group believe that the Brent Integrated Care Partnership should develop its own approach to collecting further data from all partners on social prescribing activities in Brent. Any further data collected by the Brent Integrated Care Partnership would be separate and additional to the reporting measures that already exist for separate partners. The ICP's additional data collection should complement partners' existing reporting measures and be a standalone measure that develops a shared view amongst partners. This further collection of data, driven by the ICP will develop a joined-up approach to data collection and give the ICP strategic oversight of how social prescribing is evolving and changing resident's behaviour.

Executive Response:

The ICP Executive agree that, as we expand our approach to social prescribing, there is a need to develop improved measurement of activity and impact with a specific focus on health inequalities. This is necessary in order to build system awareness and commitment to the approach and to make the case for further investment

As social prescribing is not currently undertaken nor commissioned by the Council, it is not possible to report on performance. However, its introduction into Council front line will be accompanied by the introduction of new metrics to proportionally monitor success and impact. These will be developed in partnership with the front line but are likely to consider: the proportion of staff trained in social prescribing approaches; the number of social prescribing interventions made; the demographic breakdown of social prescribing participants at least by age, deprivation and ethnicity.

As social prescribing is introduced into grant funding and as a potential social value measure within Council contracts, metrics will be introduced to report on this aspect within the reporting of grant funding and social value.

Much of the initial work will focus on maximising opportunities for social prescribing within existing funded work (for example agreed budgets for grant funding and social value within contracts). At the same time, partners in particular the PCNs will continue to determine how they utilise their resources to support social prescribing. It is therefore not proposed in the first 18 months of this work to attempt to identify and quantify the funding of social prescribing but rather to focus on “bending the spend” and identifying improvements in process and outputs.

Decision: Agreed

Actions:

- i). The Task and Finish Group will develop and own measures of activity and impact. These should be able to be captured by existing information systems and consistent across social prescribers. As a minimum these should enable reporting by deprivation and ethnicity.

Recommendation 5: It is recommended that social prescribing activities are reported quarterly to the Brent Integrated Care Partnership’s Health Inequalities and Vaccinations Executive Group, to evaluate social prescribing activities for the borough. This will create greater consistency and alignment for social prescribing across the borough.

The Task Group consider a mechanism must be put in place which ensures social prescribing activities are reported across Brent. Currently there is no overall picture of how social prescribing is developing across the borough, which elevates risks of inconsistency in the social prescribing offer across the borough which could negatively impact residents. Reporting social prescribing activities into the Brent Borough Based Partnership (ICP) will allow the ICP to have strategic oversight of social prescribing’s development in Brent, which will promote greater uniformity and alignment across the borough.

The Task Group believe that social prescribing activities should be reported into the ICP’s Health Inequalities and Vaccinations Executive Group. The Task Group recognises that social prescribing is vital in areas with higher levels of deprivation, as it can play a significant role in improving health outcomes for Brent residents who are impacted by intersectional health inequalities. It is therefore logical that social prescribing activities should be reported into this executive group, so it can review the

impact of social prescribing in reducing the deeply entrenched health inequalities that exist in Brent and the rest of the United Kingdom.

Executive Response:

The proposed reporting arrangements support the necessary senior health and care ownership of social prescribing.


As the scope of social prescribing expands to include other front line Council services (as is intended and as recommended by the Scrutiny Task Group), governance arrangements will be reviewed.

Decision: Agreed

Actions:

- i). Social prescribing task and finish group will report to the ICP's Health Inequalities and Vaccinations Executive Group quarterly.

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	Cabinet 22 May 2023
	Report from the Corporate Director of Communities & Regeneration
Church End Growth Area Masterplan Supplementary Planning Document	

Wards Affected:	Roundwood and Willesden Green
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: CEGA Masterplan SPD Appendix 2: Statement of Consultation Appendix 3: Church Road Design Guide Appendix 4: Equality Analysis
Background Papers:	Adopted Brent Local Plan
Contact Officer(s): (Name, Title, Contact Details)	<p>Alice Lester, Operational Director Regeneration Growth and Employment 020 8937 6441 Alice.Lester@brent.gov.uk</p> <p>Jonathan Kay, Head of Regeneration 020 8937 2348 Jonathan.Kay@brent.gov.uk</p> <p>Ciara Whelehan, Spatial Planning Manager 020 8937 6473 Ciara.Whelehan@brent.gov.uk</p> <p>Bruna Varante, Principal Regeneration Officer 020 8937 6133 Bruna.Varante@brent.gov.uk</p>

1.0 Purpose of the Report

- 1.1 Brent Council Cabinet September 2022 approved the draft Church End Growth Area Masterplan Supplementary Planning Document for publication and

statutory consultation. This report sets out the consultation feedback, officer consideration and recommended changes to the document. It is recommended Cabinet approve the Church End Growth Area Masterplan Supplementary Planning Document for adoption.

2.0 Recommendation(s)

- 2.1 Cabinet to consider the consultation feedback, officer consideration and recommended changes to the Church End Growth Area Masterplan Supplementary Planning Document.
- 2.2 Cabinet to approve the Church End Growth Area Masterplan Supplementary Planning Document for adoption.

3.0 Detail

Background

- 3.1 Brent's Local Plan (2019-2041) was adopted in February 2022. The Plan sets out the vision and policies for development in the borough up to 2041, which includes the delivery of 23,250 new homes from 2019/20 to 2028/29.
- 3.2 Key to accommodating an increasing population are 8 growth areas, viewed as the most sustainable spatial expression for growth. The Church End Growth Area (CEGA) extends to 26 hectares, comprised of Victorian housing stock, the local town centre and 14 hectares of industrial land allocated for mixed-use regeneration. The Local Plan identifies CEGA to be promoted for mixed-use regeneration set around the economic revitalisation of the local centre and an improved public realm, to improve the area and change the perception of the place to a busy, thriving, safe and secure neighbourhood.
- 3.3 The CEGA Masterplan SPD is a long-term, ambitious and comprehensive plan that will help to secure at least 1,300 new homes and infrastructure to maximise opportunities and wellbeing for local residents, businesses and communities, including the provision of education, health, cultural and community facilities, open space and play facilities.
- 3.4 Since early 2021 officers have worked with consultants to develop the draft CEGA Masterplan SPD. This included extensive engagement throughout 2021, with a range of partners and stakeholders including residents and local councillors, businesses, community organisations, landowners, developers and statutory bodies.
- 3.5 As outlined in the Local Plan, the CEGA Masterplan SPD is required to provide clarity and detailed guidance for new developments, inform the assessment of planning applications, and be a material consideration for future planning decisions in the area. As such, the SPD document sets out a robust urban design framework comprising development, placemaking and environmental and sustainability principles. Together these principles are designed to ensure new development unlocks the potential of the area coherently and

comprehensively, creating a place where people choose to live, work and have fun, while also adhering to the highest environmental standards required to support climate change, resilience and transition to net zero carbon. The Council will be expected to review the document every 5 years.

Consultation

Pre- Statutory Consultation

- 3.6 Early consultation with local residents, businesses and communities in Church End over 2021 to inform development of the draft CEGA Masterplan SPD included:
- Interviews
 - [Common Place interactive platform](#)
 - [Regeneration Gap video](#)
 - Interactive workshops (2x) in community infrastructure and skills, training and employment
 - Spring Outdoor Engagement Event
 - School engagement with Leopold Primary School
 - Landowner engagement
 - Businesses Survey
 - Autumn Exhibition
 - Session with Brent Mencap Disability, Rights and Politics Group
- 3.7 Feedback indicated broad support for the drafted plan, and a great appetite for change but also highlighted demand for short-term investment to tackle key issues in the area i.e. deprivation, crime, lack of access to green spaces and affordable housing.

Statutory Consultation

- 3.8 The CEGA Masterplan SPD was subject to 7 weeks of formal consultation from 22 September to 10 November 2022. This was in accordance with the Regulations and the Council's Statement of Community Consultation (SCI). Statutory public consultation provided further opportunities for engagement with partners, stakeholders, local residents, businesses and communities.
- 3.9 Information about the CEGA consultation reached over 16,000 people via the Council's social media. There were 1802 hits to the dedicated CEGA website. 627 people, including residents and statutory consultees, attended the four consultation events. 192 people engaged in dedicated one-to-one discussions with officers. 97 people completed surveys available at our events and online via our consultation portal. 19 people/organisations issued formal consultation responses.
- 3.10 Details for the statutory consultation process were publicised on social media channels including Twitter and LinkedIn. Paper copies of the CEGA Masterplan SPD were made available at Wembley, Willesden, Ealing Road and Kingsbury libraries (Harlesden was closed under-going refurbishment), alongside

feedback forms. 1500 consultation flyers were distributed to residents in and around the CEGA. 4 consultation drop-in sessions were held in and around the CEGA to listen and answer concerns and queries regarding the draft Masterplan SPD. A wide range of stakeholders including individual residents, local organisations, councillors, statutory consultees, landowners and developers, and other interested parties identified on the planning policy contacts database were notified of the consultation.

Consultation Responses – Summary

- 3.11 In total, 116 responses were received on the draft CEGA Masterplan SPD during the 7-week consultation period., as per the table below:

	Vision Values and Objectives	Identified Challenges	Identified Opportunities	Proposed development for the site Allocations
Agree	70%	61%	54%	43%
Disagree	8%	11%	4%	7%

*The remaining percentages did not agree or disagree with the plans but provided comments which have helped to inform our response and updates within the document.

- 3.12 Whilst responses are broadly positive and supportive of the overarching vision for regeneration set out in the draft CEGA Masterplan SPD, consultation responses included specific questions and concerns, mainly in relation to the topics below.

Key topics of concern

- 3.13 Affordable housing: It was stated that more affordable housing is needed and should be available for local residents in need of more suitable accommodation, including key workers in health, education and the emergency services. In response it is noted that the Masterplan SPD supports delivery of at least 1,300 new high-quality homes and follows the Council's policy that a minimum 35%, and where viable 50%, of new homes should be affordable, with a tenure split of 70% Social Rent/London Affordable Rent and 30% Intermediate Housing.
- 3.14 Green Spaces vs Building Heights: It was stated that more green space should be provided in appropriate locations to support the increase in housing. In response it is noted that the Masterplan SPD details Site Allocation policy requirements for new developments to provide six new green spaces, plus, two pocket parks, totalling approximately 9,500m² of additional green space, and also identifies areas for improvements to existing open spaces.

- 3.15 Health infrastructure: Questions were raised in relation to health infrastructure to support the increase in housing. In response it is noted that The North West London Integrated Care System (ICS) was consulted when developing the CEGA Masterplan SPD. The ICS stated that there is no current predicted need for an additional health hub/facility within the CEGA boundary. The CEGA Masterplan SPD does however designate Site Allocation BSSA2 for redevelopment to include a health facility should local needs and demand change, and subject to agreement with the ICS. A review of local health needs with the ICS is expected to take place every 5 years.
- 3.16 Educational Infrastructure: Questions were raised in relation to the educational infrastructure to support the increase in housing. In response it is noted that Brent's latest School Place Planning Strategy 2019-2023 indicates that Brent will continue to have a high number of spare places across the primary system at a borough level. Brent 2022 school planning forecasts also confirm sufficient secondary school places to meet demand up to 2028/29 in all year groups. North Brent Secondary School is under construction in Neasden Lane.
- 3.17 Parking: Comments related to parking pressures, provision for Electric Vehicle (EV) charging, parking for elderly and disabled people, and parking for religious institutions in the locality. Reducing traffic congestion and CO2 emissions is a key priority. New developments within the CEGA are proposed to be car-free or car-lite, supported by provision for share mobility such as car clubs; and must provide 3% parking provision for disabled residents, and demonstrate capacity for 10% total future provision. Nevertheless, additional need for parking for people with disabilities and to access community facilities is recognised in an amended additional objective TM4: Inclusive Parking.
- 3.18 Cleaning and Fly-tipping: Comments related more to the existing situation in Church End and were not directly relevant to the Masterplan SPD. Respondents ask for more investment in initiatives to tackle these issues order to improve the local sense of pride and by consequence, community cohesion. Although tackling fly-tipping directly is outside the scope of the Masterplan SPD, Development Principle W3 Storage indicates that new developments need to adhere to a Site Waste Management Plan and Operation Waste Management Plan. This will ensure that on-site waste is effectively managed. Development Plan policies also require reductions in both construction and household waste.
- 3.19 Safety and anti-social behaviour: Additional concerns were raised that the Council should be more active in addressing these issues in the area. Whilst the SPD seeks to improve the area in terms of safety, crime prevention, fly-tipping and public realm improvements, by setting out principles that will help to better the area, it alone cannot resolve cleanliness and social behavioural issues. In addition to the other design-related policies, the Masterplan SPD seeks to design out crime and follows the Secured by Design scheme published by the police. Developments are expected to provide passive surveillance and street lighting which help guard against anti-social behaviour.
- 3.20 Cycling: It was stated that better infrastructure should be provided, with minimum specifications seen as key to promoting safe active travel. Brent is

committed to improving cycle provision, safety and amenity for active travel modes, including cycle infrastructure that meets latest standards and guidance. Parts of CEGA fall within the Church End/Roundwood Green Neighbourhood area, where a number of traffic free and traffic reduced green routes for walking and cycling are proposed. The Masterplan SPD Section 5.2 on Movement and Connectivity sets out planned improvements for the local area (figure 30). Amendments made to this section provide more detail on proposed cycle infrastructure for the area. Due to many different road constraints, individual proposals will be assessed on their own merits when proposals come forward.

- 3.21 Young people: It was stated that more facilities and activities for them should be provided. A number of initiatives focusing on young people are expected to take place in the area. As part of the Masterplan SPD development, we have:
- BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people.
 - BSSA2 B&M Home Store and Cobbold Industrial Estate: 1x rooftop sports pitch focused on young people.
 - BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment.
- 3.22 Entertainment: It was stated that local provision should be included. The SPD area is located between Church End and Willesden Green town centres, and in proximity to Neasden and Harlesden town centres. Entertainment type uses are directed towards town centres in the first instance, to support their on-going vitality and vibrance. If such uses are spread too thinly, then they generally lack viability. As such the SPD prioritises provision of new jobs, homes, community space and open space, over entertainment uses which already exist in town centres. The Masterplan SPD acknowledges locations for music development, building on the existing local background. By doing this we plan to create an environment where creativity and entertainment is developed locally.
- 3.23 Supermarket: Comments stated that a new supermarket is required. The CEGA Masterplan SPD identifies a number of opportunities for new redevelopment and new retail floorspace, but makes no specific recommendations for a new supermarket. Proposals for any new supermarket would be considered within the context of any impacts on the vitality and viability of nearby town centres. Lidl has previously expressed interest in providing a new supermarket as part of redevelopment in the CEGA but no proposals are confirmed.
- 3.24 Heritage: Regeneration should value and preserve local heritage, including consideration of whether existing buildings need to be demolished to provide new facilities. The Masterplan has a section discussing heritage within the area (p 56-57). Development Principle H1 Heritage identifies the need to prioritise restoration and retention of architectural features in case of redevelopment.
- 3.25 Play: It was stated that more activities for children and play spaces that are fully accessible and inclusive for the community, should be provided. The Masterplan SPD (Figure 45) provides an overview of the local open space network within a 5, 15 and 25 minute walk from the centre of CEGA. Within

CEGA's inner boundary, the cemetery and church yard offer limited opportunities for recreation such as sports and play. Section 5.3 Green and Open Spaces, Development Principle PLR1- PLR5 support the provision of high-quality, inclusive safe play interventions across the CEGA. An indication of where future play facilities will be delivered can be found on figure 34.

- 3.26 High Street offer: It was stated that measures should be taken to ensure a more diverse local offer that support community needs. The existing high street offer contributes to the sense of belonging of many communities, but it could also better meet wider local need. The Masterplan SPD promotes spaces for young people, art and local enterprise as part of high street redevelopment. The Council seeks to guard against the over-proliferation of potential harmful uses such as betting shops, and takeaways. This is managed through Local Plan policy BE5, which considers their representation within the centre as a whole, and their location in relation to existing similar uses, including schools. It is not considered necessary to include this explicitly within the SPD itself.
- 3.27 Workspaces: It was stated that there is need for spaces for crafts and arts which reflect the diverse cultural ethnicity of the area and support community cohesion. Affordable workspaces are highlighted as a result of the early consultation activities and are incorporated throughout the plan, in line with planning policies BE1, BE2 and BE3. Affordable workspaces secured via S106 agreements are required to comply with agreed management plans. These can help ensure the spaces are supporting the local ethnicity and needs of the area.

Key concerns from Statutory Consultees

- 3.28 Statutory consultees responded on their areas of responsibilities, including Greater London Authority on planning policy and Transport for London. Landowners and developers emphasised the need for flexibility, and not to unduly constrain development, nor set overly prescriptive land use, design and infrastructure requirements. The proposal also received support from landowners i.e. Metroline for taking into account their requirements when proposing redevelopment.
- 3.29 Greater London Authority (GLA) stated that it was unclear what was the iterative process that Brent has been through with the Mayor and the GLA to distinguish an appropriate masterplan under Policy E7 in line with their industrial intensification practice note. GLA officers welcomed further engagement with the Brent to explore design principles to ensure high quality residential development is established alongside effectively operating industrial uses. In response it is noted that Brent Council has consulted the GLA throughout the development of the CEGA Masterplan SPD. Initial discussion took place in February 2021 prior to design development to ensure we followed the correct process for the masterplan adoption. First draft designs were shared with the GLA in October 2021 for feedback, but we received no response. It is also noted that the CEGA Masterplan SPD was match funded under the GLA Homebuilder Capacity Fund. In this situation it is reasonable for Brent Council to expect the GLA to be aligned in considering compliance with relevant policies. The team also met the GLA in November 2022. At the meeting, the process of developing

the masterplan and all engagement activities was explained. The GLA also emphasized the need to demonstrate more clearly the approach for Locally Significant Industrial Sites (LSIS), and changes have been incorporated to do that in the final version of the document (e.g. at Appendix F). The CEGA Masterplan SPD follows 'Industrial intensification and co-location through planned and masterplan approaches' by looking at LSIS sites; drawing on evidence of industrial supply and demand and identifying spatial context and non-standard uses. It proposes areas for intensification and co-location and a quantum of industrial capacity to be delivered, balancing specific local and community needs e.g. for new green spaces, community spaces and affordable homes, to help tackle deprivation, housing overcrowding and health related issues. The review post statutory consultation has presented a final opportunity to review and amend the document so it complies with GLA standards.

- 3.30 Transport for London (TfL) has made a number of comments highlighting the need for safeguarding pedestrian and cyclists' accesses throughout the CEGA and site allocations. It also indicated the need for better highlighting priorities for the different route hierarchy as well as providing more details regarding the proposed WLO station. The Movement and Connectivity section has been amended to address TfL' concerns. More detail has been added to Development Principles and included in the Road Hierarchy section.
- 3.31 Environment Agency (EA): Supportive of the plan, they highlighted the need to provide a stronger focus on the use of sustainable urban drainage systems (SuDs). EA also indicated further observations to be added as part of the development principles, as well as more details on mitigations for site allocations which will not be able to provide dedicated open/green spaces. Amendments have been made to the document to support the points raised.
- 3.32 The remaining part of statutory consultees were broadly supportive of the plans. Suggestions were made to improve the document and when possible/required amendments were made. The full detailed response can be found within Appendix 2.

4.0 Financial Implications

- 4.1 Costs for the CEGA Masterplan SPD were met through existing Regeneration budgets.
- 4.2 There are no spending commitments entered into as a result of the approval of this document. Any additional spending requirements in the future will be subject to further approvals.

5.0 Legal Implications

- 5.1 Town and Country Planning (Local Planning) (England) Regulations provide for Local Planning Authorities to adopt Supplementary Planning Documents. These documents are to provide more detailed guidance on how a development plan policy will be interpreted in the determination of planning applications.

Supplementary Planning Documents cannot introduce new policy or allocate sites for development.

6.0 Equality Implications

- 6.1 The Equality Act 2010 introduced a new public sector equality duty under section 149. It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Council must, in exercising its functions, have “due regard” to the need to:
1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 2. Advance equality of opportunity between people who share a protected characteristic and those who do not.
 3. Foster good relations between people who share a protected characteristic and those who do not.
 - 4.
- 6.2 Equality analysis has been undertaken and is at Appendix 4. Equalities analysis identifies that the CEGA Masterplan SPD and regeneration of the area has the potential for positive equalities impacts for people of all ages, people with disabilities, BAME communities and women. Analysis also identifies some businesses may need to move to alternative premises during redevelopment, and the CEGA Masterplan SPD expects new development proposals affecting industrial sites in Church End to include plans to retain local business and employment, with an appropriate phasing and business relocation strategy and mitigation adopted to protect and support businesses to stay local.

7.0 Consultation with Ward Members and Stakeholders

- 7.1 The Lead Member for Regeneration and Planning has been regularly briefed on the development of the CEGA Masterplan SPD. Ward councillors from the former Dudden Hill, Harlesden and Willesden Green wards were regularly briefed throughout 2021 on public engagement and development of the draft CEGA Masterplan SPD. Following the boundary changes and local elections 2022, newly elected ward councillors from Roundwood and Willesden Green wards were briefed on the draft CEGA Masterplan SPD in November 2022. It was also presented to the cross-party Local Plan member Working Group in December 2022.
- 7.2 Stakeholder engagement including with the Greater London Authority, Transport for London, local landowners and developers was undertaken during development and consultation on the draft CEGA Masterplan SPD.
- 7.3 Statutory public consultation was undertaken for an extended period of 7 weeks in line with the relevant Regulation and as set out in this report.

8.0 Human Resources/Property Implications (if appropriate)

- 8.1 Regeneration and Spatial Planning teams have developed the CEGA Masterplan SPD in-house, building on masterplan work developed by

appointed consultants Hawkins Brown, Jan Kattein Architects; PJA Transport Planning; Ramidus, Propernomics, BNP Paribas and Studio Vizable 3d.

Report sign off:

Alice Lester

Director Regeneration, Growth and Employment

CHURCH END GROWTH AREA

MASTERPLAN AND SUPPLEMENTARY PLANNING DOCUMENT (SPD) MAY 2023

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View BSSA3 – Church End Local Centre

Image: Vizable 3d



Executive Summary

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

The area has an appetite for change.

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

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

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

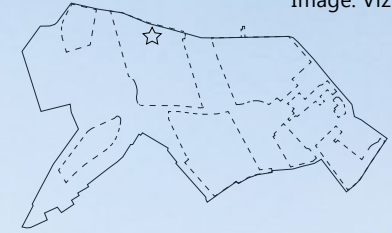
- Fit for purpose industrial spaces for local businesses and emerging sectors including film, music, media and food production;
- Opportunities for employment, skills and training for local people;

- A minimum of 1,300 new high quality homes, including affordable homes, family sized-dwellings, and specialist accommodation for older people;
- A revitalised town centre and outdoor market with a diverse offer;
- A range of new community and cultural spaces that support interaction and community cohesion;
- New open spaces, incorporating play for a range of ages including young people and teenagers, alongside opportunities for food growing and access to nature;
- A high quality environment that is safe and accessible to everyone;
- Streets that encourage walking and cycling over private vehicle use, and better connect Church End to the surrounding area;
- A place that achieves the highest standards of sustainability and supports a low carbon circular economy.

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

View BSSA1 – Asiatic Carpets

Image: Vizible 3d



About the Document

Why is this Masterplan needed?

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

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

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

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

How has the Masterplan been developed?

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

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

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

Statutory Consultation

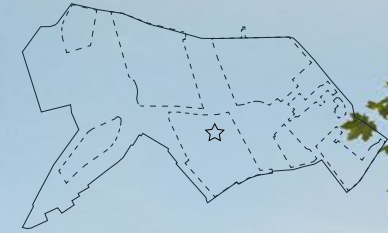
Following the work developed throughout 2021, the CEGA Masterplan SPD was developed throughout 2022 and it was subject to 7 weeks of formal consultation from 22 September 2022 to 10 November 2022. This process provided stakeholders with another opportunity to provide feedback on the work developed to date. Stakeholders were invited to participate in different ways, including online and face-to-face.

Who should use the Masterplan SPD?

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

View BSSA2 – New Public Square

Image: Vizible 3d



1.0 Church End Revival

1	Vision
2	Values and Objectives

1.1 Vision

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

of local people. A better network of green infrastructure alongside connected, legible and safe pedestrian and cycle routes will promote a healthy environment for the community to meet, walk, cycle, exercise, play and have fun.

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



Credit: Illustration BSSA2 – Hawkins\Brown





1.2 Values and Objectives

Page 78



Credit: Jason Hawkes



A resilient place

Prosperous, providing training, skills and local employment opportunities

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



Credit: Brent Council Image Library



A sustainable place

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



Credit: Brent Council Image Library



A characterful place

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

1.2 Values and Objectives



Credit: Brent Council Image Library



An inclusive place

Celebrates its ethnic and cultural diversity

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



Hawkins\Brown Masterplan Report



A green place

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



Credit: Brent Council Image Library



A connected place

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

2.0 Strategic Overview

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

2.1 Location

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

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Figure 1 – Diagram indicating CEGA location within London

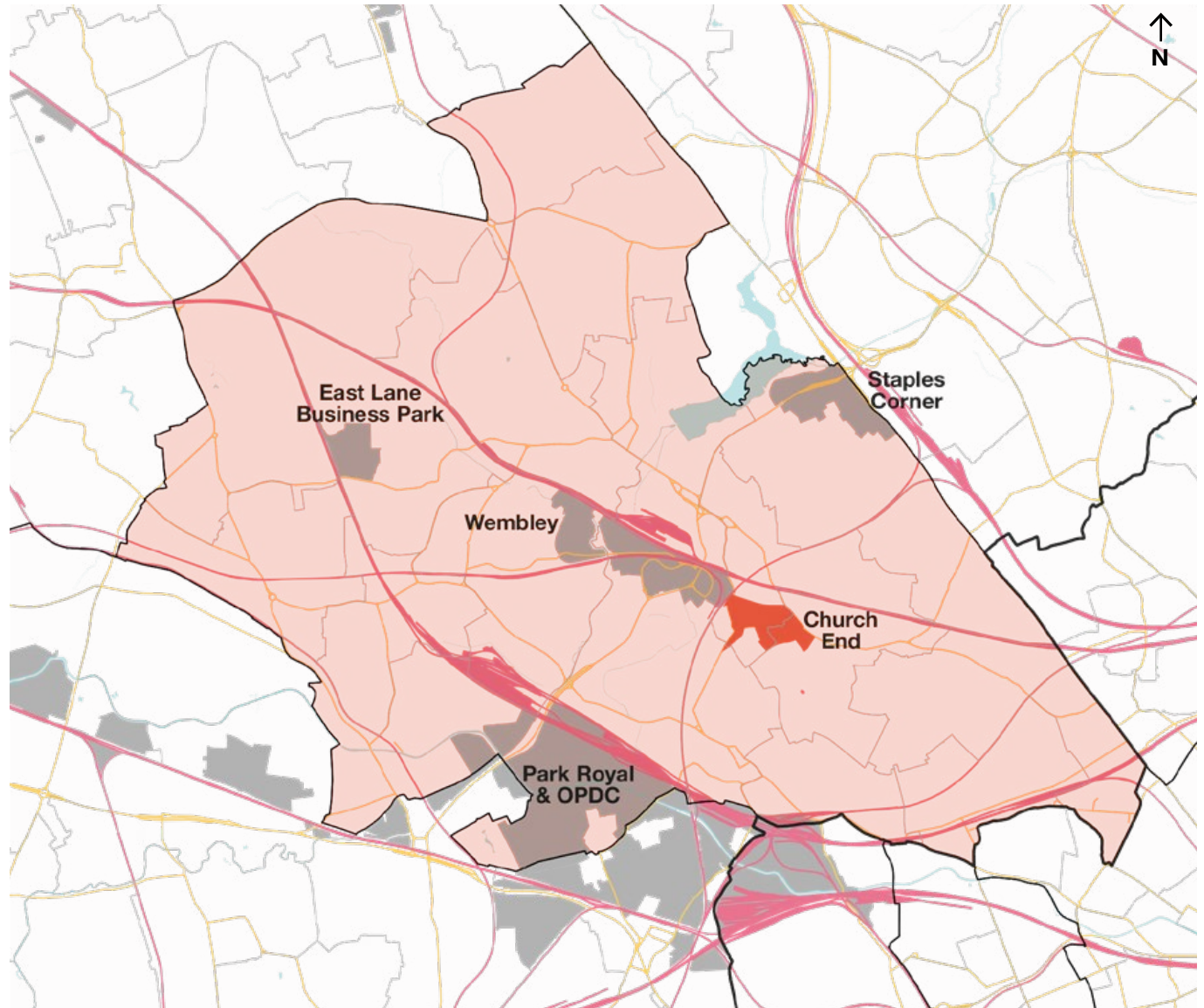


Figure 2 – Diagram indicating CEGA location within London Borough of Brent

2.2 Neasden Stations Growth Area

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

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Figure 3 – Neasden Growth Area – Bird eye view

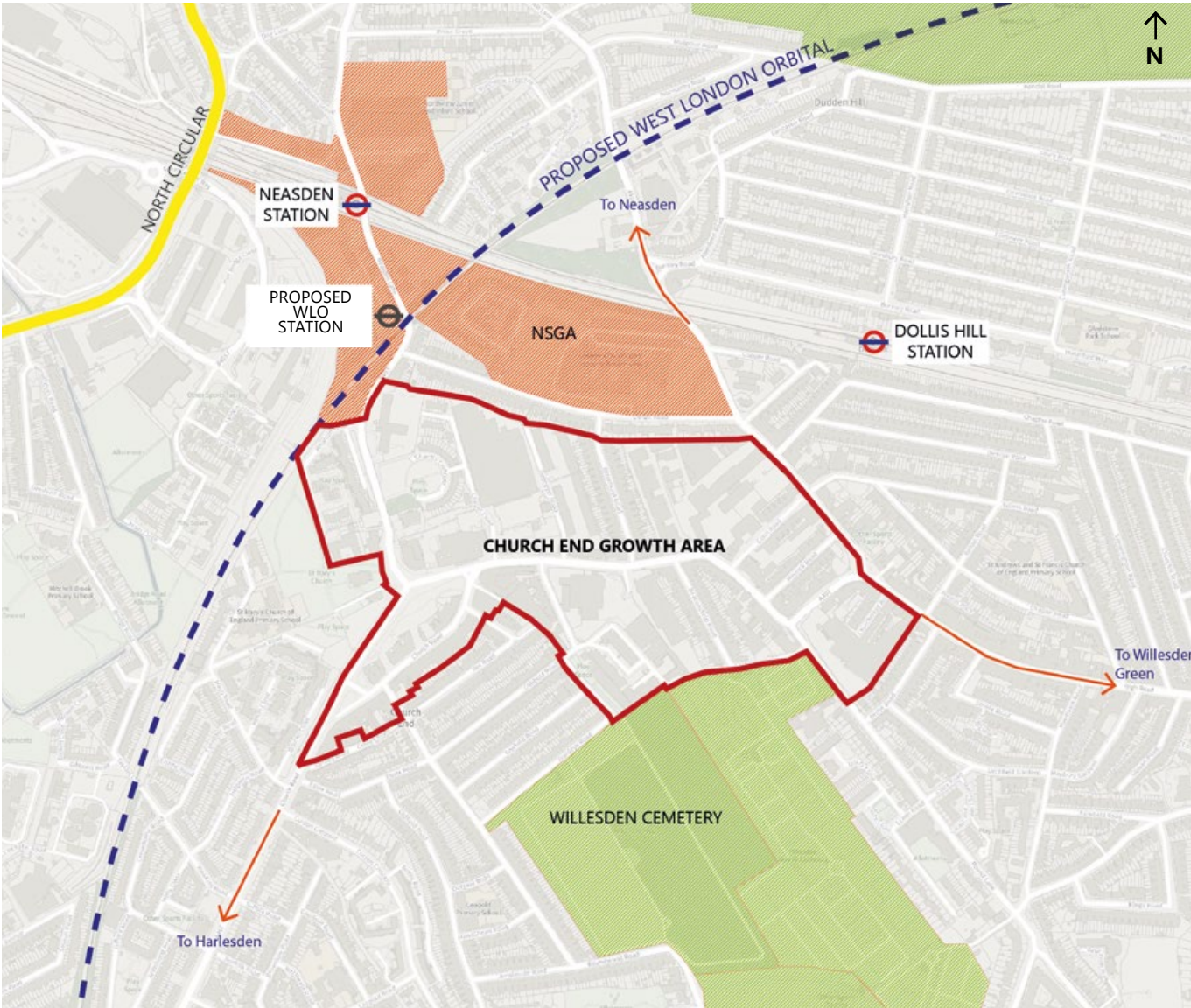


Figure 4 – Map demonstrating the connection between NSGA and CEGA

2.3 West London Orbital

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

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

Key

- /// Opportunity Areas
- Strategic Interchange
- Proposed West London Orbital Rail and proposed station
- - -○- - - Potential West London Orbital Rail and proposed station
- Existing West London Overground line and station
- ★ CEGA

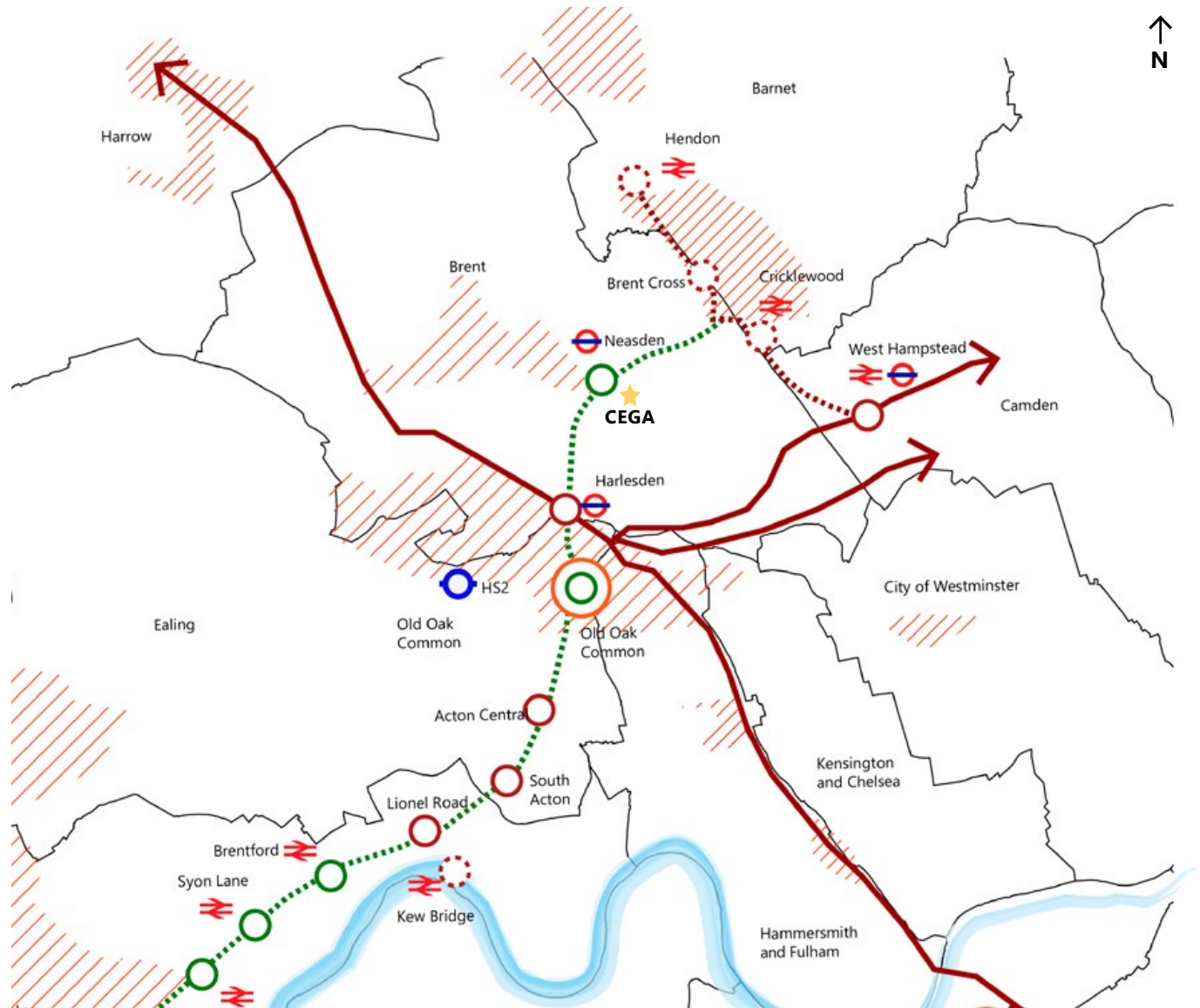


Figure 5 – Map adapted from West London Orbital Proposed Route (Mayor's Transport Strategy 2018)

2.4 Policy Context

- 2.4.1 The London Plan sets Brent a housing target of 23,250 over 10 years (2019/20 – 2028/29). It also recognises the need for sufficient land for a range of industrial, logistics and related uses essential to London's economy, and serve the needs of the growing population.
- 2.4.2 To meet these competing land pressures, London Plan Policy E7 allows for the intensification of Locally Significant Industrial Sites (LSIS) through the co-location of industrial and residential uses. It recognises the need to sensitively manage the interaction between these uses. Policy D13, on the Agent of Change principle, places the responsibility for mitigating impacts from existing noise and other nuisance generating activities or applicants proposing new noise-sensitive developments.
- 2.4.3 Brent Local Plan policy BSGA1 identifies Church End as a Growth Area, with potential to deliver over 1,300 homes. Housing will primarily be delivered through co-location and re-provision on Church End's LSIS and local employment sites.
- 2.4.4 The town centre's southern parade is to be enhanced and historic features restored. Comprehensive development to the northern parade and car park will deliver a new market square, community and commercial space and housing. To meet industrial needs, Local Plan policy BE3 requires designated industrial sites to intensify, and policy BE3 requires Local Employment Sites to provide the maximum employment floorspace viable.
- 2.4.5 London Plan policy S1 supports proposals that deliver high quality infrastructure that address a local or strategic need. Brent Local Plan policy BSGA1 sets infrastructure needs for Church End for education, health, cultural and community facilities, open space and play facilities, whilst policy BSI1 protects existing social infrastructure.



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

3.0 Church End: Evolution and Today

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

3.1 Church End Historic Development



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



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



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

→
Continue
next page

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

19th century

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

1870-90s

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

1914-1918

First World War – more industry moved to the district.



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



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



Image Church End, 2019.

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1930s

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

1940s

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

1960s

Church End was hit by industrial decline.

1990s

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

2000s

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

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



3.2 Challenges

3.2.1 An analysis of local data and demographics¹ have highlighted the following:

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

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

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

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

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

3.2.7 **Brownfield and occupied sites:** CEGA is a well occupied area, with new growth and development primarily planned to be delivered on low density, but mainly occupied, industrial sites.

3.2.8 **Climate Change:** Brent Council is committed to target carbon neutrality by 2030. Church End is one of the most deprived areas of the borough and could be more vulnerable to climate change impacts. Residents in more deprived areas are more likely to live in poorly ventilated homes with less access to green space and lack financial capacity to prepare for floods and heatwaves. Children, elderly people, and people with disabilities or existing health conditions are also more vulnerable from a public health perspective.

3.2.9 **Overall state of the area:** Church End has suffered from lack of investment for decades. Cleanliness is a recurrent issue of the area.

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

- Residents in the Growth Area are cautious but receptive to change.
- Music is of great importance to the cultural identity of Church End and has the potential to be a catalyst to engage young people.

- The existing high street offer contributes to the sense of belonging of many communities, but it could also better meet wider local needs.
- There is an absence of larger public spaces and play facilities within easy walking distance.
- Any new successful open space must be fully accessible, comfortable, well-kept and secure.
- There are limited neutral community spaces within Church End.
- Spaces for all ages are key to promote community cohesion and tackle social isolation.
- Affordable workspaces can encourage the growth of local creative and entrepreneurial industries.
- Businesses located within the industrial sites are positive about their premises and expectations for growth.
- There is a need for training and employment opportunities, particularly for young people.
- The pandemic has brought about an increased awareness of poor mental health and general well-being.
- Trust, integrity, long-term commitment and local roots will be essential for the creation of successful spaces in Church End.

¹ Church End social demographics – please see Appendix E

² LB Brent, adopted Local Plan, 2022

3.3 Opportunities

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



Figure 8 – United Borders, local charity working with young people and music production



Figure 9 – Outdoor Engagement Event, May 2021

4.0 Church End Growth Capacity

4.1
4.2
Page 100

Site Allocations

The Masterplan

4.1 Site Allocations

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

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

4.1.2 The additional three site allocations within the CEGB are:

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



Figure 10 – CEGB Site Allocations. Adapted from Hawkins\Brown Masterplan Report.

Key

- Masterplanned sites
- Other Local Plan site allocations
- Locally Significant Industrial Sites (LSIS)
- Local Employment Sites (LES)

4.2 The Masterplan

- 4.2.1 The preferred masterplanning approach allows a phased redevelopment of the site allocations. This approach reflects the policy framework, is informed by engagement with the community and landowners, and has been viability tested. Alternative options were considered, however, the preferred approach represents the best balance between the need to deliver housing and maintain and intensify industrial uses in the area. It is also considered the most deliverable taking into account land ownership and existing occupiers.
- 4.2.2 Land use and massing plans articulate an acceptable form of redevelopment and an indication of the sites potential uses and development capacity. Detailed scheme proposals will however be evaluated on their own merit and how they contribute to the comprehensive redevelopment of the area when they come forward at application stage. Future proposals are expected to adhere to the principles and urban design framework set within the draft SPD and work in partnership with adjacent landowners to avoid compromising the potential wider redevelopment of the site.
- 4.2.3 The capacity indicated in the Site Allocation is an 'indicative target'. As it is 'indicative', providing an application which delivers a greater number of dwellings is robustly justified, and compliant with the wider development plan and the aspirations of this SPD, then it could be considered acceptable at application stage.

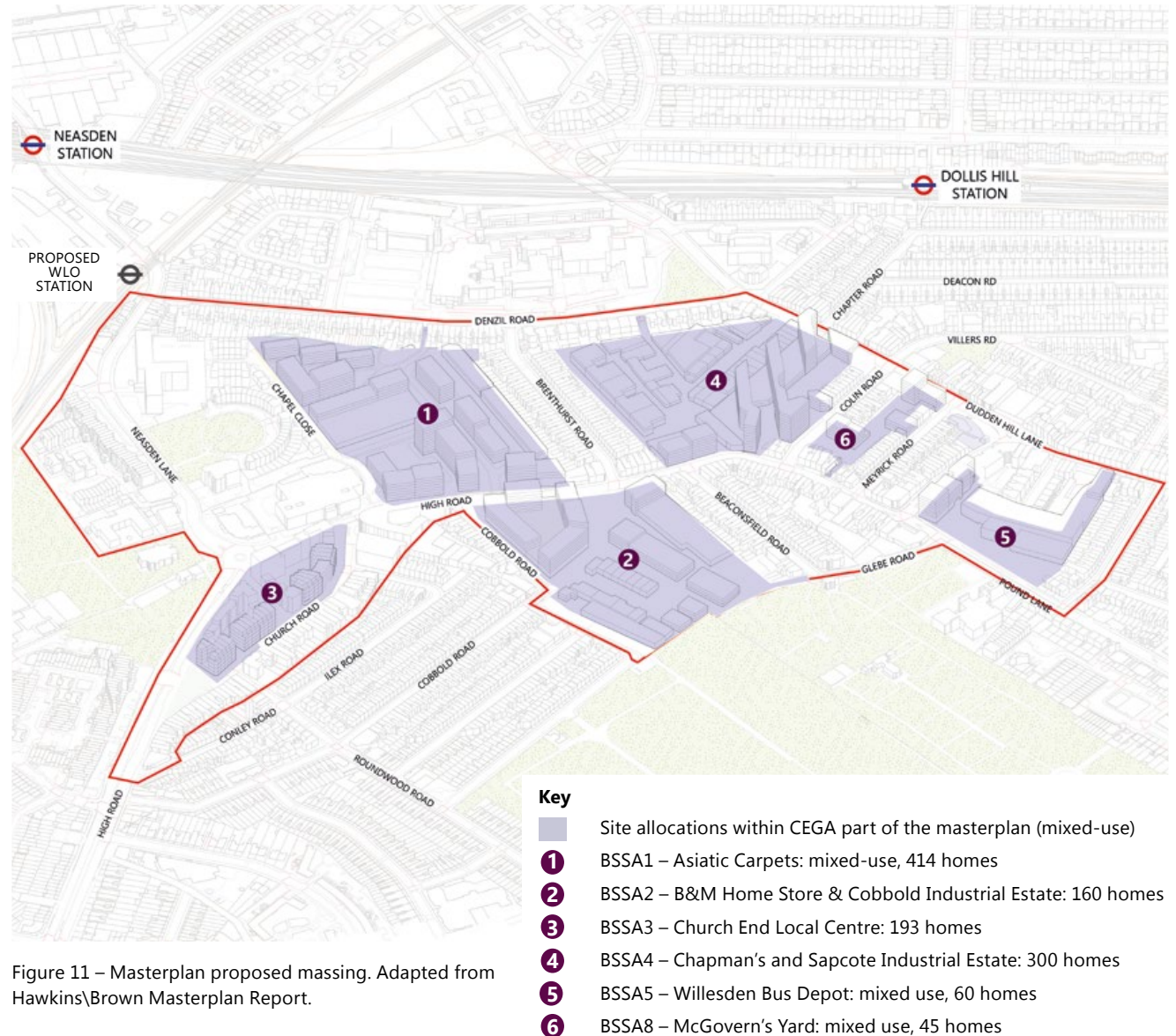


Figure 11 – Masterplan proposed massing. Adapted from Hawkins\Brown Masterplan Report.




















5.0 Urban Design Framework

- 5.1 Land Use
- 5.2 Movement and Connectivity
- 5.3 Green and Open Spaces
- 5.4 Building Design and Architecture
- 5.5 Climate Change and Sustainability

Proposed Framework

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

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

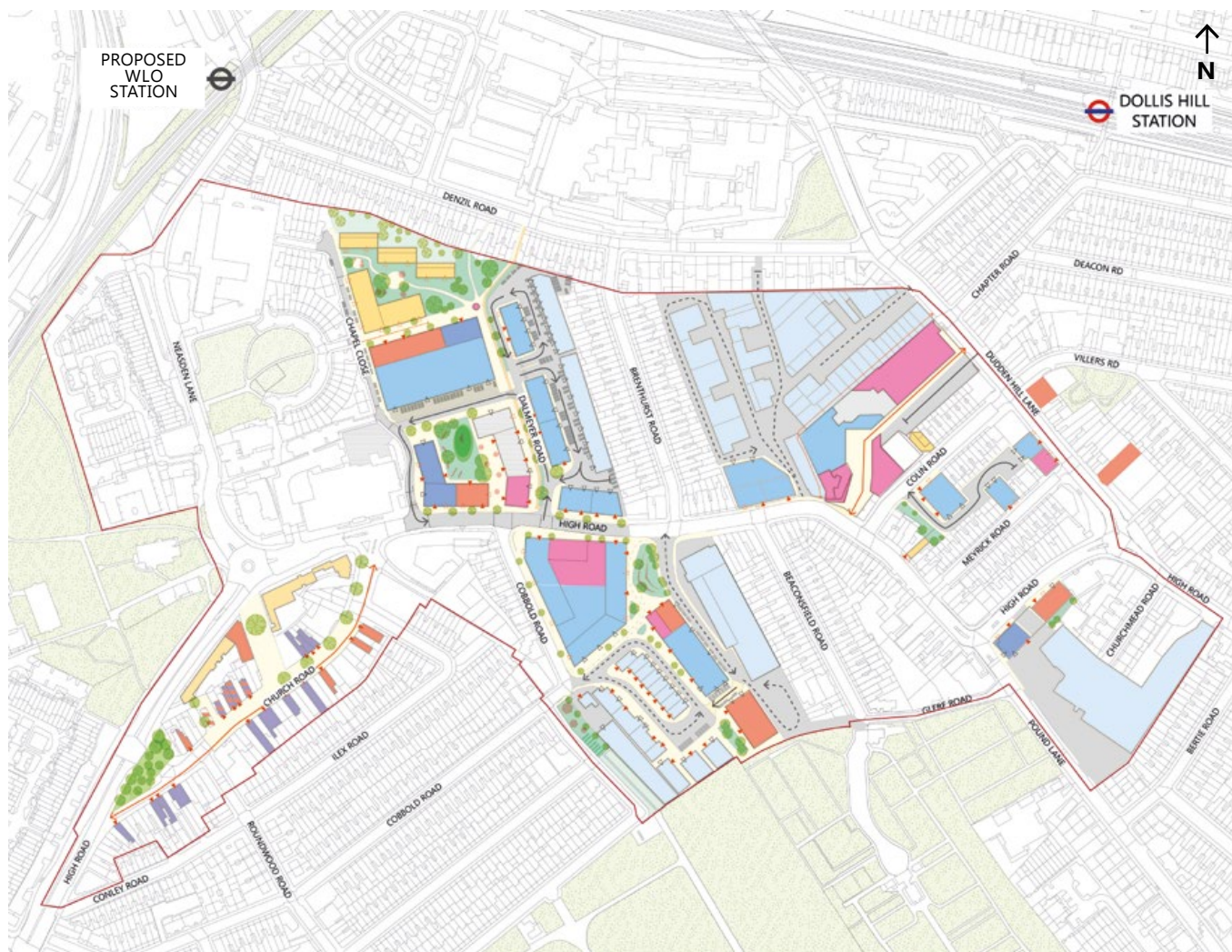


Figure 12 – Proposed Land Use Framework. Adapted from Hawkins\Brown Masterplan Report.

5.1 Land Use

Proposed Framework

- 5.1.2 The Masterplan SPD seeks to strike a balance between green spaces and building heights. CEGA is within an open space deficiency area and so provision of green spaces are one of the area's top priorities. Nevertheless, in order to provide the needed green space provision, enough development is needed.
- 5.1.3 The approach for developing building heights aimed to consider a gradual increase of storeys, with building heights increasing towards the middle of the site, attempting to limit their impact to the existing residential urban grain.

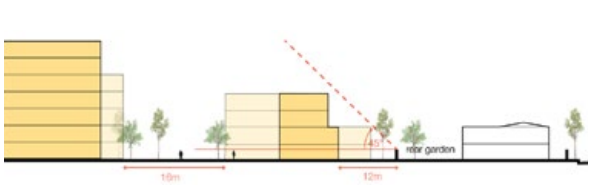


Figure 13 – Section A-A BSSA1

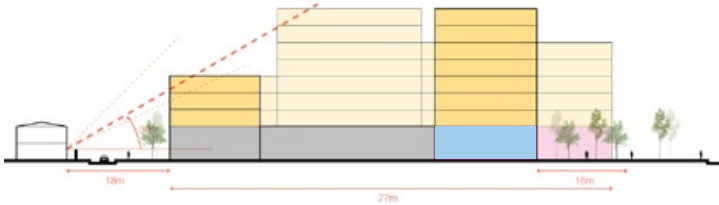


Figure 14 – Section B-B BSSA2



Figure 15 – Overview massing across the site allocation

- Key**
- Industrial B2/B8/E – existing
 - Retained
 - E(g) – light industrial
 - E(c)/E(g) – Commercial offices, workspace and services
 - F – Community and Learning
 - E(a)/(b)/(c) and sui generis – Retail, F&B and services
 - C3 – Residential
 - New green and open spaces
 - Public realm

5.1 Land Use

Development Principles

Town Centre Uses

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

Context

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

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



Figure 16 – Church End Town Centre. Brent Image Library

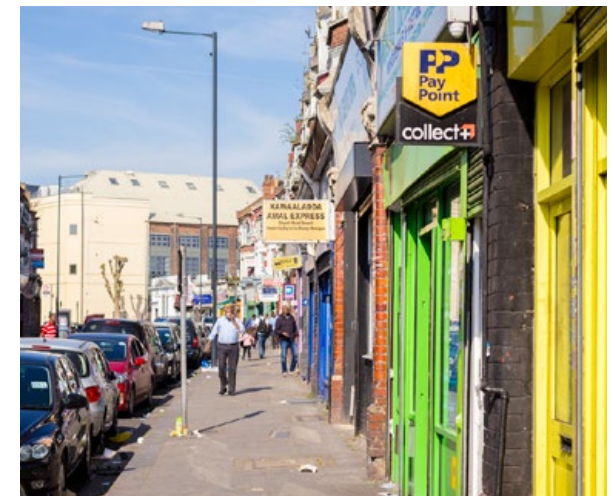


Figure 17 – Church End Town Centre. Brent Image Library

5.1 Land Use

Development Principles

Industrial & Employment

- **IE1 Intensification:** Maximise industrial floorspace through intensification. On Locally Significant Industrial Sites (LSIS), increase industrial floorspace with a target of achieving a minimum 0.65 plot ratio or existing, whichever is greater. Development on LSIS must not result in a net loss of industrial floorspace. (Local Plan policy BE2)
- **IE2 Affordability:** Provide 10% of new industrial floorspace as affordable workspace on LSIS, and provide the maximum viable affordable workspace on Local Employment Sites. (Local Plan policy BE3)
- **IE3 Co-Location:** Deliver new industrial that provides an appropriate mix of uses that can operate to optimal use. (London Plan policy D13)
- **IE4 Floorspace:** Provide a range of high quality industrial floorspace which is fit for purpose and reflective of borough needs, having regard to the site specific clusters and potential for specialisms as identified in the site allocations. For LSIS only those uses listed under criterion A of London Plan policy E4 are acceptable. (Local Plan policy BE2)
- **IE5 Business engagement:** Proactively engage with existing businesses to seek to retain them on site where possible, and support any businesses that cannot be incorporated to relocate off site. This is to be evidenced through a Business Relocation Strategy.
- **IE6 Local opportunities:** Support economic growth by creating and promoting opportunities for employment, skills and training development for local people particularly in emerging sectors. (Local Plan policy BE1)
- **IE7 Phasing:** On LSIS sites where residential is co-located with industrial, the industrial elements must be completed in advance of any residential element being occupied, in accordance with criterion D2 of London Plan policy E4. This should be conditioned to ensure compliance.

Context

- 5.1.4 Most of Church End's industrial stock is within designated Locally Significant Industrial Sites (LSIS). 30,000sqm employment space, accommodating around 60 businesses and approximately 500 jobs across a variety of business sectors. The top three uses are: wholesale (24%), vehicle sale & repairs (17%); and manufacturing (10%).
- 5.1.5 Church End, as with Brent as a whole, is represented in sectors more at risk of automation and changes in technology and patterns of trade. There is a need to enable future growth sectors such as the low carbon circular economy, science and technology, creative industries and food production. There is also a real need to increase employment levels and job quality.
- 5.1.6 Affordability is a key draw for businesses in Church End. Brent's Affordable Workspace Strategy and Action Plan (2020) identifies additional need for Incubator, Accelerator and Co-working space, cluster spaces for creative industries like film and music to build on existing workspace infrastructure, and makerspace.

5.1 Land Use

Development Principles

Residential

- **R1 Target:** Delivery of at least 1,300 new high quality homes co-located with industrial uses, by meeting or exceeding the identified site specific indicative residential capacity set out in Figure 11. (Local Plan policy BSGA1)
- **R2 Mix and tenure:** Create mixed, balanced and tenure blind housing to meets a range of identified local housing needs. A minimum of 35%, and when viable 50%, of new homes are to be affordable, with a tenure split of 70% Social Rent/London Affordable Rent and 30% intermediate (London Living Rent, affordable rent within London Housing Allowance limits and London Shared Ownership), and a minimum of 25% of new homes as family-sized dwellings (3 bed+). Early engagement with a Registered Provider is encouraged. (Local Plan policy BH5 & BH6)
- **R3 Specialist accommodation:** Deliver specialist older people's accommodation as a minimum of 10% of additional dwellings, over those with planning permission, across CEGA. The preferred sites with potential to support provision are BSSA1 Asiatic Carpets site

and BSSA2 B&M Home store and Cobbold Industrial Estate. (Local Plan policy BH8)

- **R4 Quality:** Deliver homes which promote health and well-being by providing quality internal and external amenity, good solar exposure, dual aspect units, etc. (London Plan policy D6, Brent Local Plan policy BH13)
- **R5 Co-location:** Deliver new housing that can sit comfortably alongside new industrial spaces. Mitigate any potential conflicts between uses and provide a high quality environment for both residents and businesses. (London Plan policy D13 & E7.)
- **R6 Accessible and adaptable housing:** Provide at least 10% of dwellings to meet Building Regulations requirement M4(3) 'wheelchair accessible standard' and the remainder to meet M4(2) 'accessible and adaptable dwellings.' (London Plan policy D7 & D5.)

Context

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



Figure 18 – North West Quarter – South Kilburn.
Brent Image Library

5.1 Land Use

Development Principles

Community & Cultural

- **CC1 New facilities:** Provide a range of new high quality, accessible, multi-functional community facilities, in accordance with Figure 12 as follows:
 - BSSA1 Asiatic Carpets – a community space linked to the existing arts and film production function and dedicated space to serve young people. A community facing function for the Probation Service is also encouraged, should it remain on site.
 - BSSA2 B&M Home Store and Cobbold Industrial Estate – space for primary, community, mental health care. Should premises not be required by the Integrated Care System, an alternative community space should be provided on site and a health focus will be encourage.
 - BSSA3 Church End Local Centre – small scale community spaces through reactivation of vacant or underutilised units.
 - BSSA4: Chapman's and Sapcote Estate – Workspace providing business support.

- BSSA5: Willesden Bus Depot – retention of a pub or alternative community function through meanwhile use and permanent reprovision within the redevelopment of the vacant Crown Public House. (Local Plan policy BSGA1).
- **CC2 Co-design:** Seek to engage local people, including young people, in the development and on-going operation of community space. Community Use Agreements will be secured to ensure community benefits are maximised including, where space is linked to a cultural or employment use, through training opportunities. (Local Plan policy BSI1, BE1).
- **CC3 Existing Uses:** Protect, retain and enhance existing community facilities, which are meeting a local need. (Local Plan policy BSI1).

Context

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

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

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



Figure 19 – New Secondary School and College at Neasden Lane/Planning Application CGI.

Existing Framework

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

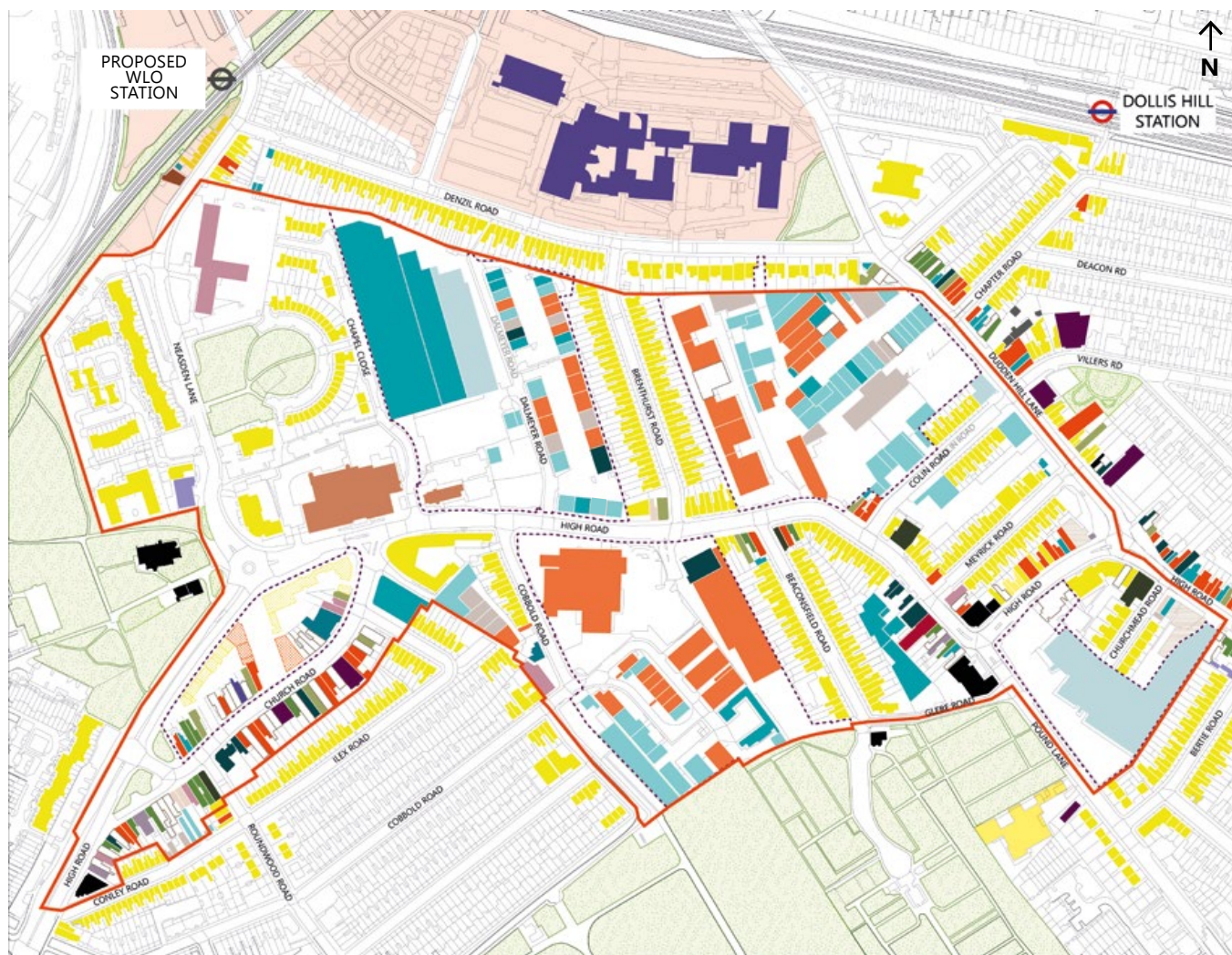


Figure 20 – Land Use based on street view survey [images: 2019] and Hawkins\Brown Church End Industrial Intensification and Co-location study, 2020. NOTE: these do not account for new vacancies and changes in use as a result of Covid-19

5.2 Movement and Connectivity

Proposed Framework

- 5.2.1 The proposed framework establishes a clear and cohesive street hierarchy. This approach aims to promote active and sustainable travel choices; promote permeability and connectivity with its surroundings; and improve servicing arrangements for industrial and commercial uses, whilst protecting residential amenities.
- 5.2.2 In order to support this framework, a number of interventions have been identified. Proposed interventions on Figure 30 include upgrades to existing junctions and crossings facilities; new crossing facilities to connect with local desire lines; new cycle facilities; and Liveable Neighbourhood schemes.
- 5.2.3 It is suggested an area wide 20mph speed limit in order to support and enable more trips by walking/cycling. This will be supported by other calming measures such as: improvements at junctions, redesign of road markings, speed humps, raised tables, introduction of trees in build outs, green buffer strips/SUDs where space allows.

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Figure 21 – Proposed street hierarchy. Adapted Hawkins\Brown Masterplan Report

5.2 Movement and Connectivity

Proposed Framework

Street Hierarchy

● Dual Carriageway

Ideal widths: Footway min 2m clear width// Cycle Path min 2.2 m if one-way or 3.0m if two-way // Carriageway min. 3.5m per lane // Vegetated Buffer min 1m //. It should prioritise as a minimum: Street lighting facing both footway and carriageway; Formal wayfinding towards stations, nearby parks and key destinations; Green buffer between carriageways between carriageway and footways; Potential for reduction of carriageway lanes, additional trees, cycle parking, seating & play, rain gardens and Sustainable Urban Drainage (SuDs); Cycle lanes on both sides.

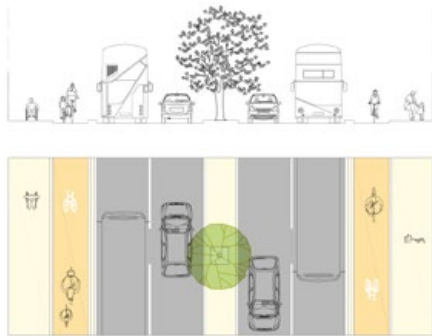


Figure 22 – Diagrammatic section dual carriageway

● Strategic Connector

Ideal widths: Footway min 2m clear width// Should provide: Street lighting facing both footway and carriageway; Junctions and crossings designed to facilitate safe, convenient active travel; Formal wayfinding towards stations, nearby parks, key destinations and Town Centres; Safe and overlooked cycle parking; Opportunities for greening vertical surfaces.

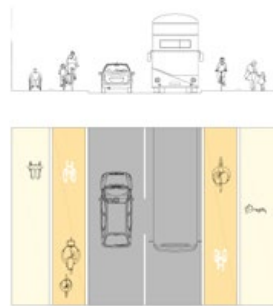


Figure 23 – Diagrammatic section strategic connector

● City Hub Boulevard

Ideal widths: Footway min 2m clear width// Cycle Path min 2.2m if one-way or 3.0m if two-way // Carriageway min. 3.5m per lane // Vegetated Buffer min 1-1.5m //. Feature street trees as buffer and green landmarks; Street lighting facing both footway and carriageway and potential downlighters for trees; Formal wayfinding towards stations, nearby parks, key destinations and Town Centres; Seating and spill out from adjacent ground floor uses; Safe and overlooked cycle parking; Junctions and crossings designed to facilitate safe, convenient active travel.

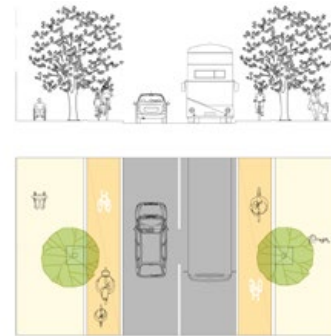


Figure 24 – Diagrammatic section city hub boulevard

● Local Street

Ideal widths: Footway min 2m clear width// Should provide: Lighting to prioritise footways; Clear sightlines to landmarks and informal wayfinding; Potential for small-scale community interventions and opportunities for growing; Junctions and crossings designed to facilitate safe, convenient active travel (particularly with strategic connector/dual carriageway).



Figure 25 – Diagrammatic section local street

*Sections are for illustrative purposes only and indicate best practice and scenarios. Further consideration will be given to specific road constraints.

5.2 Movement and Connectivity

Proposed Framework

● City Place

Ideal widths: Footway min 2m clear width//Min. 8m. Footway min 2m // Pedestrian priority/shared surface. Should provide: Street trees and low level planting; Formal wayfinding; Lighting to prioritise footways; Benches Seating and spill out from adjacent ground floor uses; Safe and overlooked cycle parking.



Figure 26 – Hildreth Street, Balham. TfL Healthy Streets for London

● Industrial/residential

Ideal widths: Footway min 2m clear width//. Should provide: Street lighting facing both footway and carriageway; Clear formal signage for the industrial estates; Clear wayfinding for pedestrians and cycle connections; Green buffer between servicing routes and pedestrian/ cycle infrastructure, trees.



Figure 27 – San Sebastian. Hawkins\Brown Masterplan Report

● Pedestrian links

It should prioritize as a minimum: Lighting; Potential for greening and small-scale SuDs interventions; Wayfinding; Public art and murals.



Figure 28 – Street art in Ipswich city centre. Outside and Active

● Green Routes

It should prioritize as a minimum: Playful and feature lighting; Seating; Greening, SuDs and intensive landscaping; Informal wayfinding; Public art and play interventions.



Figure 29 – Drapers Field by KLA « Landscape Architecture Platform | Landezine

*Photos are for illustrative purposes only and indicate best practice and scenarios. Further consideration will be given to specific road constraints.

5.2 Movement and Connectivity

Proposed Interventions

Key

- Streetscape Improvements: lighting, pavement, greening
- 1.1 Church Road + Market day closures
- 1.2 Cobbold Rd/Franklyn Rd
- 1.3 Beaconsfield Rd
- 1.4 Dollis Hill Station/Chapter Road
- 1.5 Neasden Ln
- 1.6 High Road
- 1.7 Neasden Station Public Realm (project part of NSGA, design and funding subject to confirmation and approval from TfL)
- 1.8 Colin Road

Crossing Improvements

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

Cycleway Improvements

- 3.1 High Road cycle route
- 3.2 Church End Road cycle route and facilities
- 3.3 Neasden Ln cycle lane route
- 3.4 Dudden Hill cycle route and facilities
- ➔ Cycle route

Low Traffic Neighbourhood

- 4.1 Roundwood cell
- 4.2 Church Road cell
- 4.3 Willesden Green cell
- 4.4 Bus Depot cell

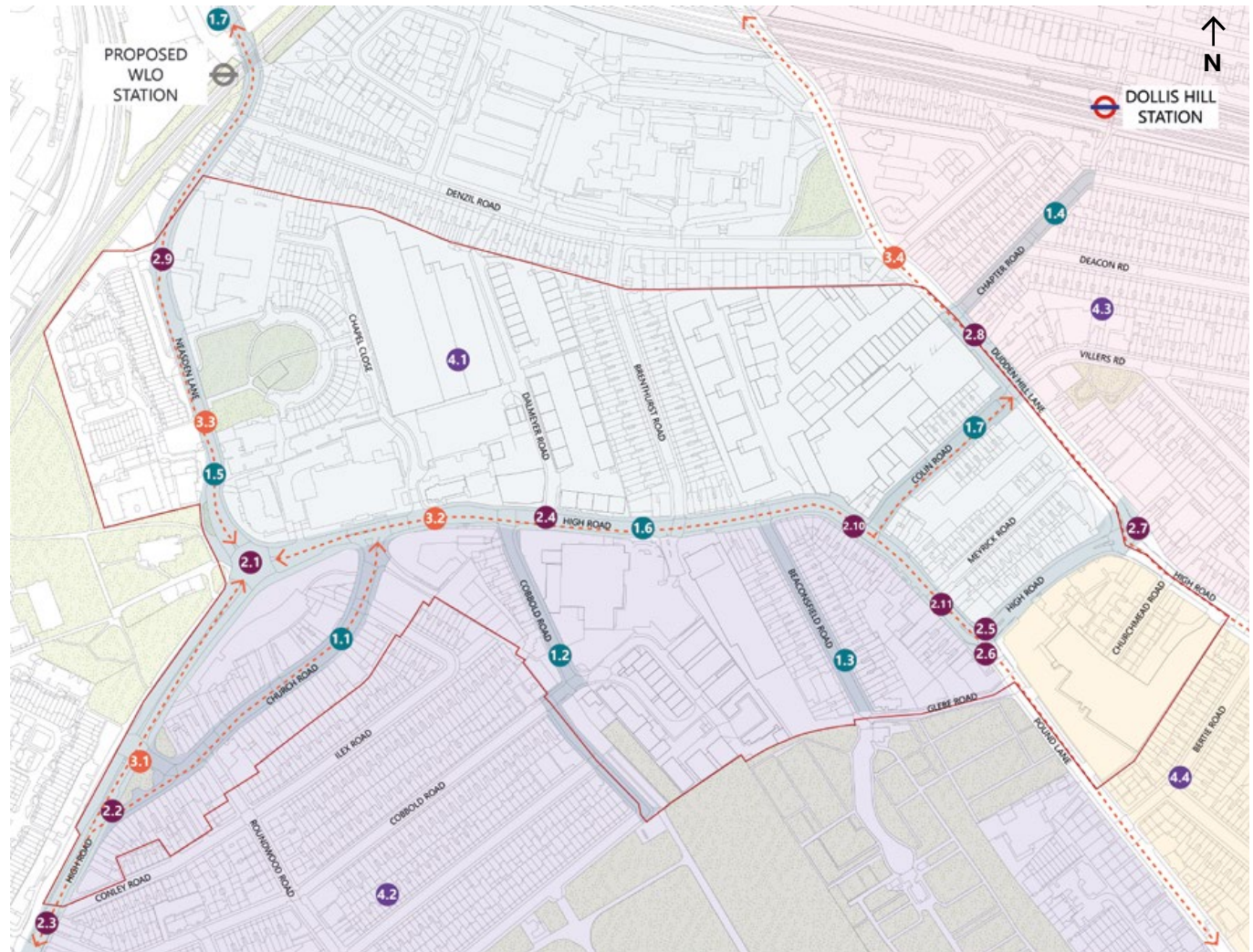


Figure 30 – Proposed infrastructure projects. Adapted Hawkins\Brown Masterplan Report

○ Church End Growth Area (CEGA) boundary

5.2 Movement and Connectivity

Proposed Interventions

- 5.2.3 For Church End Town Centre, two options have been identified to create an improved environment. These interventions will be further developed through engagement with the community and TfL.
- Option 1** – Create a low-traffic environment on Church Road: The proposal would restrict through traffic along Church Road between Ilex Road and Roundwood Road. Only London buses and cyclists could travel through this section. Daytime servicing and loading for local businesses would be restricted to early morning and from early evening. Bus stops would be relocated to each end of Church Road.
 - Option 2** – Building upon option 1, recreate the historic alignment of Church Road: The two green spaces would be joined to form a public square whilst businesses at the western end of the high street would retain access to servicing and loading facilities. In this option, London buses would continue to circulate throughout. The section between Ilex Road and Roundwood Road would continue to have restricted traffic for private vehicles, but movement throughout the two roads would remain as it is.

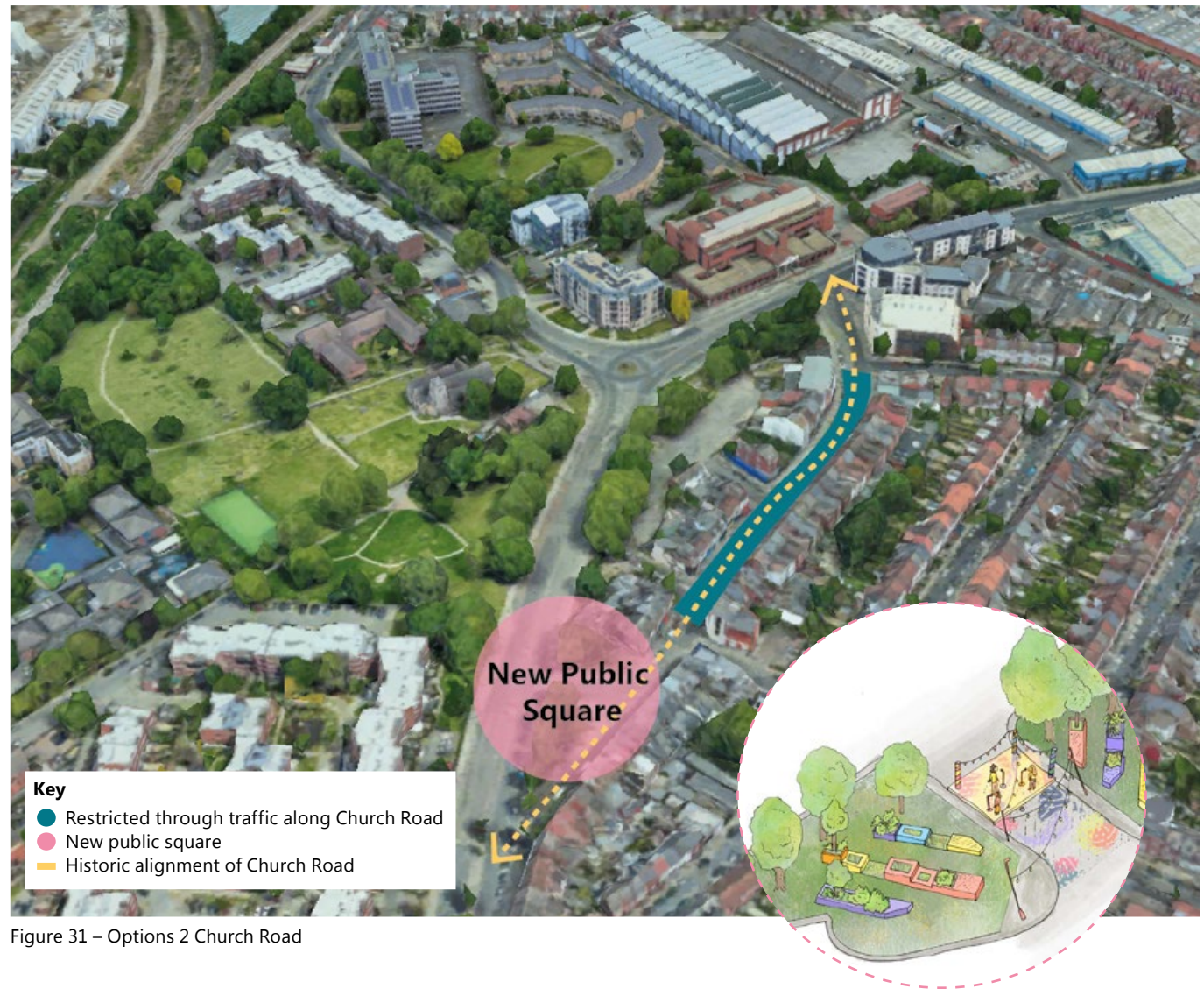


Figure 31 – Options 2 Church Road

5.2 Movement and Connectivity

Development Principles

Sustainable Travel

- **ST1 Active Travel:** Development should prioritise active, efficient and sustainable transport choices, contributing to the recommendations in Figure 30. Conditions and connectivity for pedestrians and cyclists should be improved to key destinations including public transport stations and Church Road Town Centre. (Local Plan policy BT1)
- **ST2 Healthy streets:** A 'Healthy Streets' approach, as set out in the Mayor's Transport Strategy underpinned by the introduction of an area wide 20mph, will contribute to make the area safer, greener and more inclusive. Development should be consistent with the street hierarchy in Figure 21. (London Plan policy T2)
- **ST3 Wayfinding and public art:** Public realm should integrate public art at gateway locations and more incidentally at a neighbourhood level, with the involvement of the local community. Signage and wayfinding to key destinations should use Legible London signage and be clear to overcome language barriers. (London Plan policy D8)

- **ST4 Cycling:** Developers should support the creation of new east-west and north-south cycle routes across CEGA. High quality, safe, secure cycle parking and storage facilities are to be provided on the routes as well as within buildings. (Local Plan policy BT1), Local Transport Note (LTN) and London Cycling Design Standards (LCDS).
- **ST5 Bus stops:** Any relocation of stands and stops must be discussed with TfL in advance of any application being submitted, to ensure that any alternative location offered is suitable and adheres to TfL's standards.
- **ST6 Inclusive cycling:** Cycle infrastructure needs to support people with physical or mental disabilities, new cyclists, the elderly, injury rehabilitation referrals and those lacking the confidence to take a bicycle out on the road.

Context

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

- 5.2.5 The majority of key destinations including the underground stations, are within a short 400m (approx. 5 mins) walking distance of the centre of CEGA. Routes are often of poor pedestrian amenities. Principal challenges identified include:
- High Road between Neasden Lane and Pound Lane: Currently dominated by traffic. Neasden Lane and Dudden Hill Lane: pedestrians and cyclists share routes alongside large flows of vehicular traffic.
 - Severance: Onward connectivity is limited by the presence of physical barriers, such as railway lines with few crossing points.
 - Wayfinding: Church End can be a difficult area to navigate because of its absence of clear wayfinding or signage.
 - Crossing points: There is a lack of formal, signalised and convenient pedestrian crossings on desire lines and particularly at major junctions.
 - Cycling: There is limited cycling infrastructure within CEGA, and this includes cycle routes, racks and storage. The only dedicated cycle route is a 250m section of the High Road below the junction with Neasden Lane. London Cycle Network (LCN) Routes 47 and 48 are signposted through the area. Faded line markings and narrow sections add to the sense of poor provision and amenity.

5.2 Movement and Connectivity

Development Principles

Traffic Management

- **TM1 Transport impacts:** Development should be underpinned by a robust Transport Assessment and Travel Plans to mitigate and manage transport impacts. (NPPF)
- **TM2 Car ownership and parking:** Reduce travel by private car through car-free or car-lite development supported by provision for shared mobility including car clubs. Provision must be made for charging electric or Ultra-Low Emission vehicles. (Local Plan policy BT2) Footway parking should be avoided.
- **TM3 Logistics:** Development should be informed by Delivery and Servicing Plans. These should balance providing adequate access, yard space and servicing arrangements for industrial/commercial uses and residents whilst protecting amenity. Technical innovation to consolidate delivery and construction transport as well as the use of non-motorised freight transport is supported and encouraged, including provision for electric vehicles. Consideration should be given to imposing safety standards for delivery and servicing vehicles at the site: minimum of FORS Silver, preferred of FORS Gold for all HGVs). (Local Plan policy BT3)

- **TM4 Inclusive parking:** Disabled parking needs to be secured in new developments and to access community facilities. Please also refer to London Plan parking standards.

Context

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

5.2.7 Proximity to the North Circular Road makes the area attractive to a variety of industries. Existing land uses, including light industrial and warehouse units, increase the proportion of trips by large vehicles into the study area.

This further exacerbates the impact on the road network. Heavy Goods Vehicles (HGVs) on some residential streets also contribute a cluttered, dirty and dangerous environment.

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



Figure 32 – Church Road during Market Days

5.2 Movement and Connectivity

Existing Framework

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

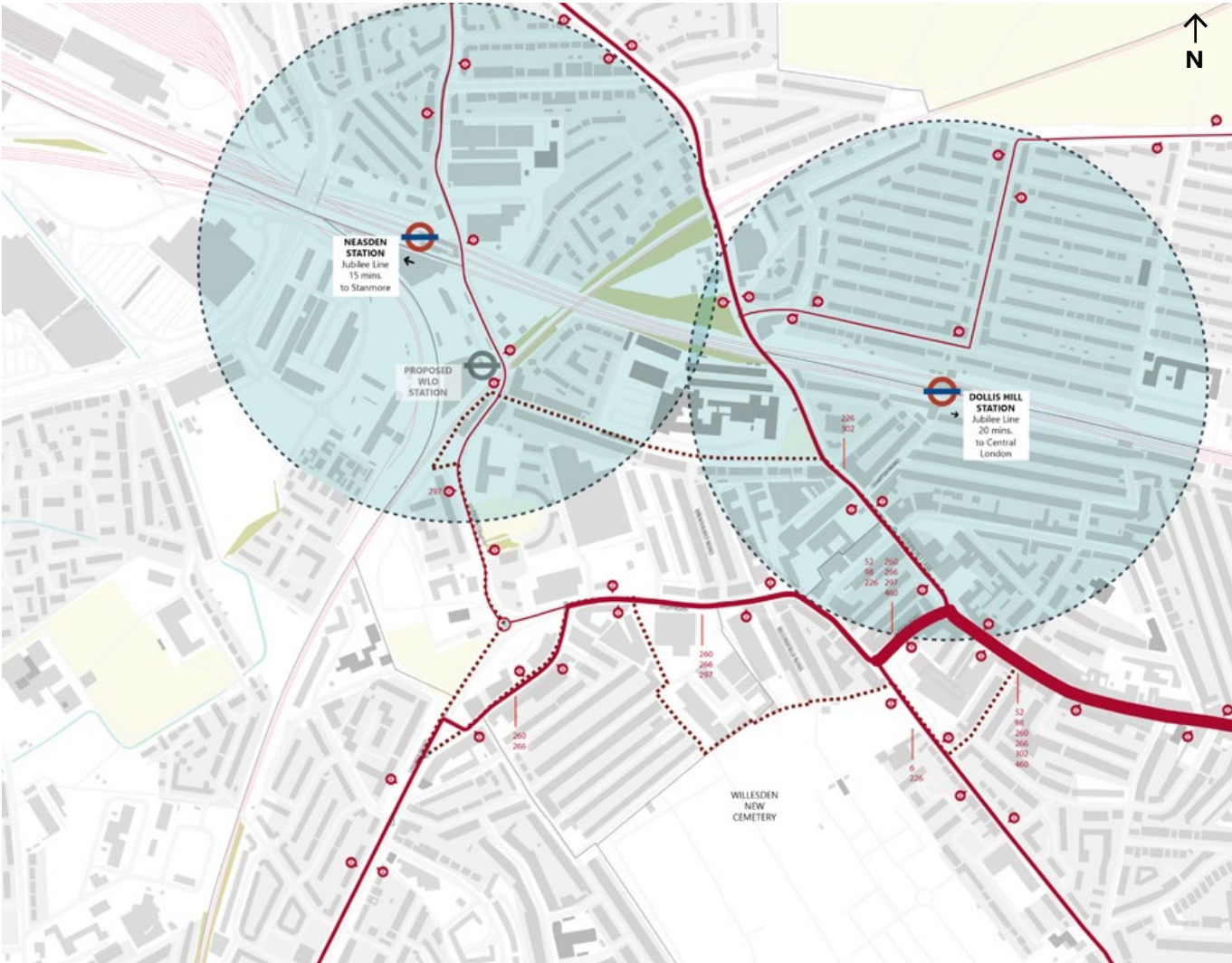


Figure 33 – Existing Movement and Transport Network. Adapted Hawkins\Brown Masterplan Report

5.3 Green and Open Spaces

Proposed Framework

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

Key

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

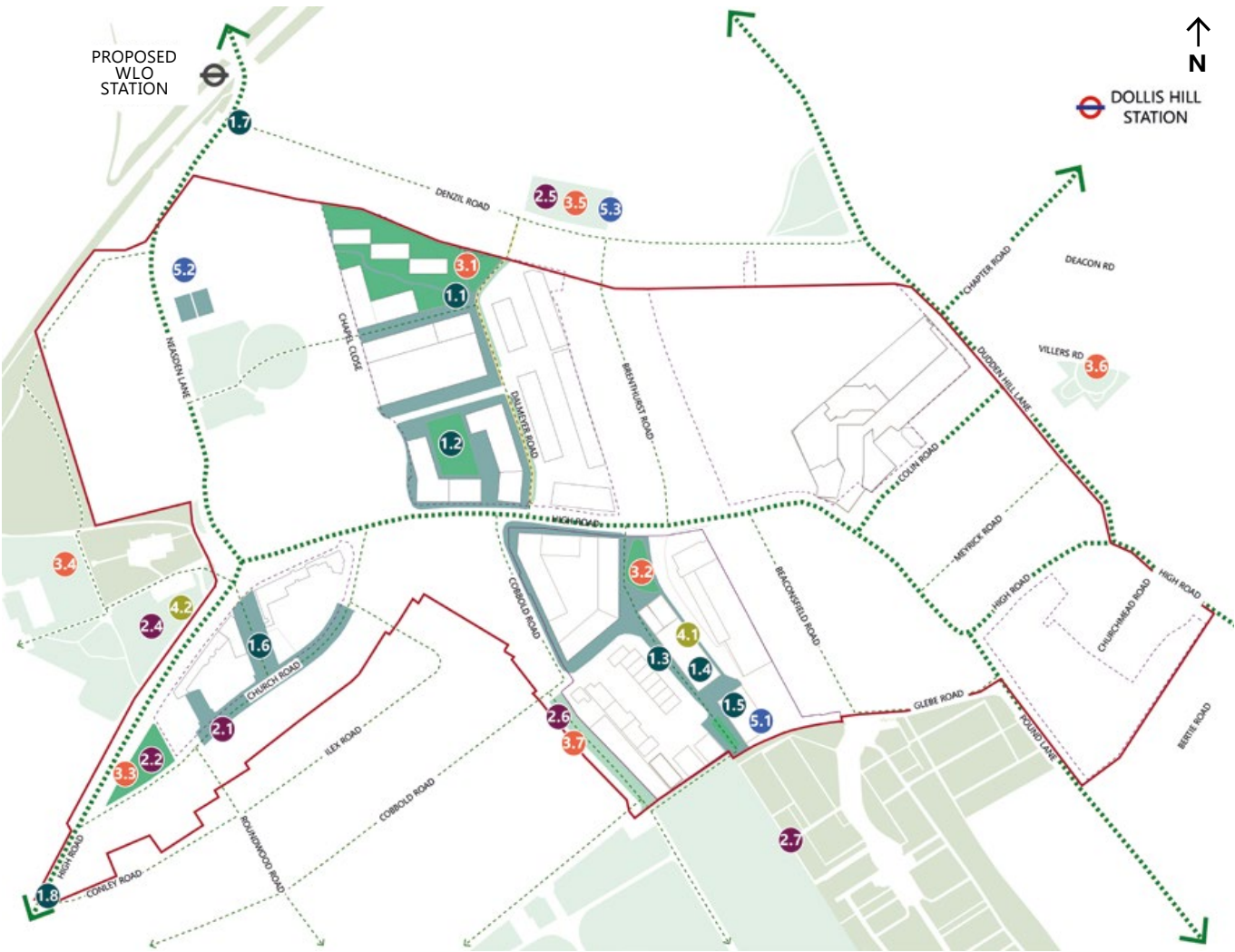


Figure 34 – Proposed green infrastructure framework. Adapted Hawkins\Brown Masterplan Report

5.3 Green and Open Spaces

Development Principles

Open and Green Spaces

- **OGS1 Green spaces:** Contribute to the creation of a network of multi-functional green spaces, based on the site-specific requirements set out in Figure 34. (Local Plan policy BG11)
- **OGS2 Connectivity:** Connect new green spaces into the wider network of existing green spaces through street improvements. (London Plan policy G1)
- **OGS3 Safety:** Create safe spaces and secure access by designing out crime, and by providing well-lit and overlooked spaces, adjacent uses that provide activation. Development proposals should pay due regard to Secured by Design (SbD) standards. (Local Plan policy BG11)
- **OGS4 Maintenance:** Plan for long-term management and maintenance to ensure spaces are well-used and remain high quality over time. Developers should engage the community in the design of spaces to promote a sense of ownership, respect and responsibility. (Local Plan policy BG11)

- **OGS5 Sustainable design:** Deliver high quality design by integrating sustainability principles and ecological landscape features. This can include permeable paved surfaces, native planting, durable/recycled materials for artificial elements, reduce watering maintenance, recycling provision, and renewable energy lighting. (Local Plan policy BG11)

Context

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

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

- 5.3.4 Within the wider open space network, the typologies vary between parks, churchyard, allotments, and cemeteries. Most of the green spaces are located at the periphery or beyond CEGA. However, these open spaces are beyond the GLA accessibility standards, generally away from areas of higher footfall and not very visible.
- 5.3.5 In 2019 Keep Britain Tidy (KBT) assessed the conditions of facilities and the quality of existing provision against the Green Flag Standard. KBT identified key issues related to damage and vandalism, lack of facilities, absence of disability access, lack of natural surveillance and poor visibility in and out of the existing open spaces.



Figure 35 – Gillet Square, Hackney/Hawkins/Brown Masterplan Report

5.3 Green and Open Spaces

Development Principles

Play and Recreation

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

is stimulating, incidental, safe to access, overlooked, incorporates greenery, and not segregated by tenure. (London Plan policy S4)

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

Context

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

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

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

* LAPS (Local Area for Play): A LAP is primarily for under-6s within 100m or 1 minute walking time. The recommended minimum activity zone for a LAP is 100sqm. A LAP can be within residential areas, and includes pocket parks. LEAPs (Local Equipped Area for Play): A LEAP is for children who are beginning to play independently within 400m/5 minutes' walk. Its recommended minimum activity zone is 400 sqm. Mostly located within parks and residential areas.



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

5.3 Green and Open Spaces

Development Principles

Food Growing

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

Context

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

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



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



Figure 38 – Uncommon Ground, Chicago. NPR Org

5.3 Green and Open Spaces

Development Principles

Urban greening, Biodiversity and Habitat creation

- **UBH1 Urban Greening factor:** Aim to meet the Urban Greening Factor (UGF) of 0.4 for developments that are predominantly residential and 0.3 for those predominantly commercial (excluding B2 and B8 uses). The minimum net gain in biodiversity should be 10% in line with the Environment Act 2021. (London Plan policy G5)
- **UBH2 Biodiversity gains:** Consider biodiversity in the wider site design and aim to secure net biodiversity gains. A balance should be struck to ensure quiet and undisturbed spaces where wildlife can thrive. (London Plan policy G6)
- **UBH3 Biodiversity links:** Create habitat corridors that connect to the existing network of wildlife corridors and habitats in the surrounding area. High quality landscape features should be integrated into street design separating conflicting modes of transport. (Local Plan policy BGI1)

Context

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



Figure 39 – Camden Beeline Org Gallery



Figure 40 – Stratford Butterfly Farm Gallery

5.3 Green and Open Spaces

Development Principles

Outdoor Sports Facilities

- **OSF1 Health and well-being:** The fitness and wellbeing needs of the existing and new community should be met through the provision of multifunctional sports facilities to encourage an active lifestyle. Site-specific requirements in Figure 34 sets out the minimum to be delivered. (London Plan policy S5)
- **OSF2 Maintenance:** Development should contribute towards the maintenance, improvement and, where possible, expansion of existing sports facilities. (London Plan policy S5)
- **OSF3 Facilities:** All sports facilities, including pavilions, changing rooms, artificial pitches, and lighting, should be developed in accordance with Sport England's Design Guidance to ensure they are fit for purpose. (London Plan policy S5)
- **OSF4 Integration:** Developments should promote community cohesion and the multiple use of new premises will be secured through Community Use Agreements. (Local Plan policy BSI1)

- **OSF5 Design:** Developments must plan for active design. Please refer to the [Sport England Active Design](#) checklist.

Context

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



Figure 41 – Osterley Sports Centre. Lampton leisure



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

5.3 Green and Open Spaces

Development Principles

Public Realm

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

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Context

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

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

5.3.14 The Council is supportive of sport and recreation facilities to complement employment uses. Sports and leisure uses will therefore be considered acceptable on existing retail sites where their need is evidenced, in addition to designated and non-designated employment land where they contribute toward mixed communities, and development intensifies industrial/employment floorspace in accordance with Local Plan policies.



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



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

5.3 Green and Open Spaces

Existing Framework

Key

- Page 116
- Within a 10min walking distance

1 Willesden New Cemetery

2 St Mary's Churchyard and Fields

3 Neasden Lane Open Space

Further than 20 min walking distance

4 Yeats Close Allotments (1.4 ha)

5 Bridge Road Allotments (1.6 ha)

6 Gibbons Recreation Ground (3.3 ha)

7 Gibbons Road Allotments (0.5 ha)

8 Brentfield Open Space (10.2 ha)

9 Harlesden Canal

10 Marian Way (<0.2ha)

11 Chadwick Road (<0.2ha)

12 Longstone Avenue Open Space (11.9 ha)

13 Roundwood Park (14.8 ha)

14 Gladstone Park South (13 ha)

15 Gladstone Park (27 ha)

Canal network

CEGA Boundary

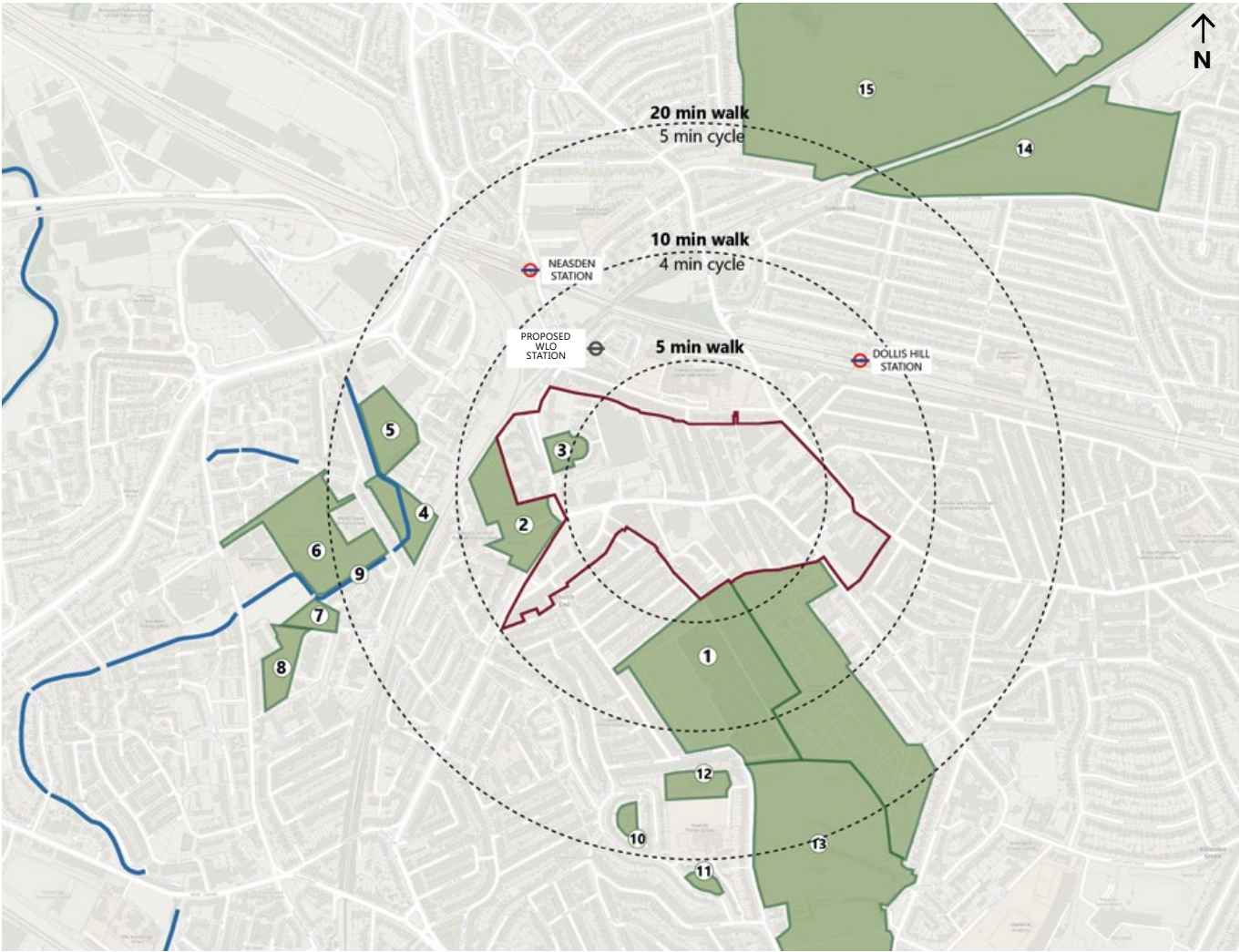


Figure 45 – Existing green infrastructure

5.4 Building Design and Architecture

Proposed Framework

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

- **High Street (site-by-site intensification)**
- **New low-mid rise residential:** Low to-mid-rise residential. This responds to the adjacent two storey terraced houses.
- **New mid-high rise residential:** It is defined as a range of typologies that respond to the different spatial conditions of each site allocation.
- **New stacked residential/industrial:** Represents an important part of the masterplan. It is broadly defined as large podiums with blocks above or yards.
- **New intensified industrial**
- **New community related uses**
- **Existing**

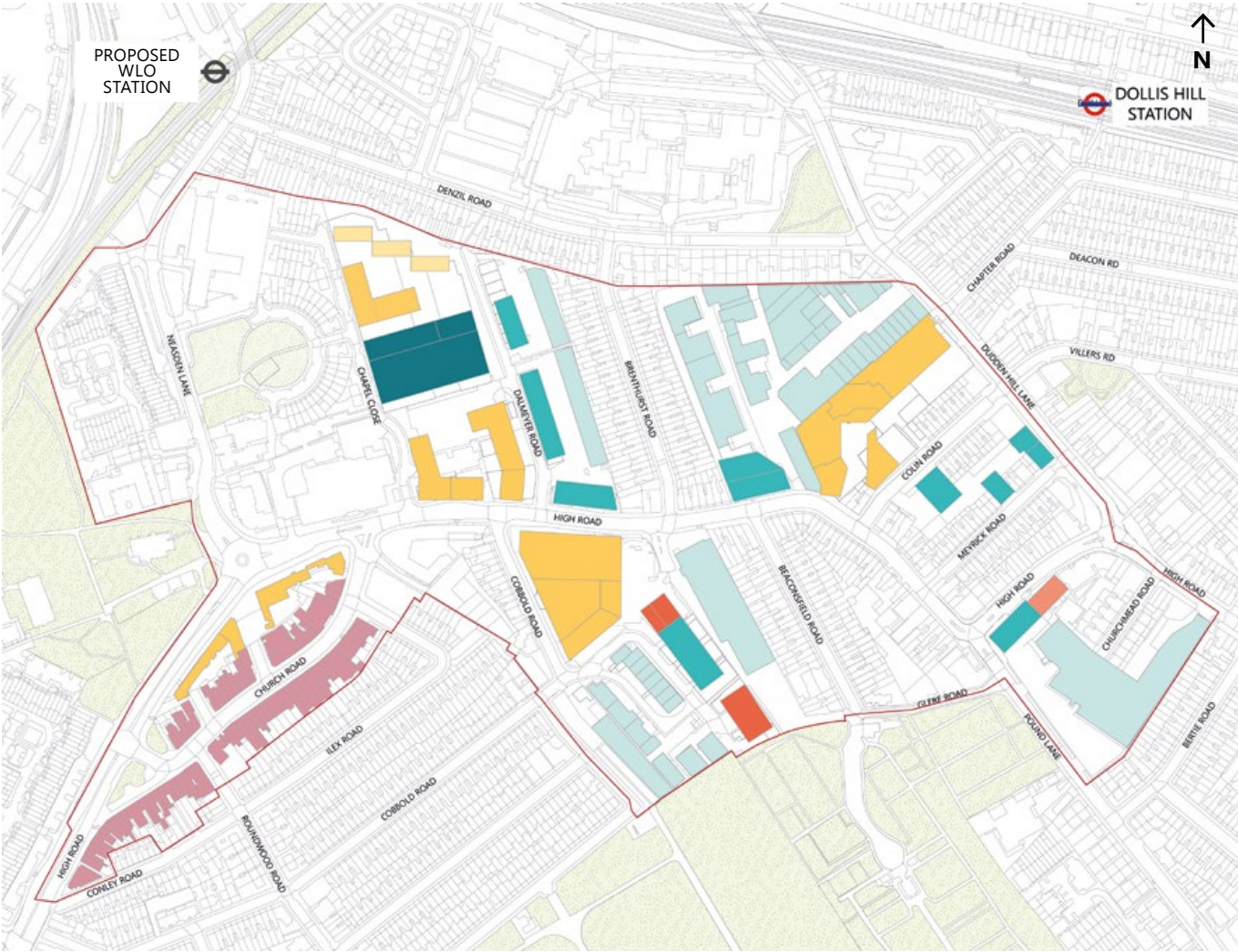


Figure 46 – Proposed building typology. Adapted Hawkins\Brown Masterplan Report

5.4 Building Design and Architecture

Proposed Framework

High Street (site-by-site intensification)



Redchurch Townhouse, Shoreditch, 31/44 Architects. A fill on high street responding to local character and grain



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

New low-mid rise residential



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



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

New mid-high rise residential



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



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

New stacked industrial/ residential



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



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

New intensified industrial



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



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

New community hub



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

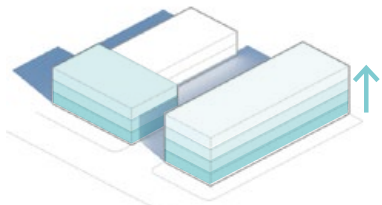


The Granville, RCKa. Retrofit of existing building to provide new community hub and affordable workspace

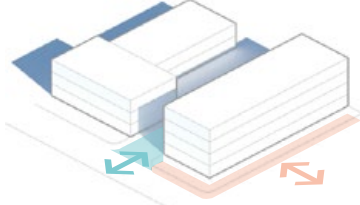
5.4 Building Design and Architecture

Design Principles

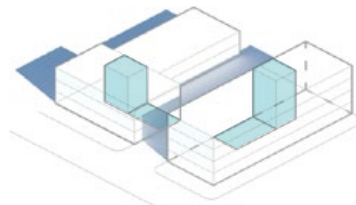
Industrial Intensification



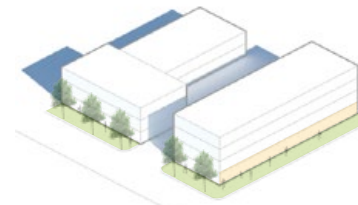
Provide a wide range of accommodation types helps better respond to the demands as well as optimising the way space is used. Encourage stacking smaller activities above larger ones.



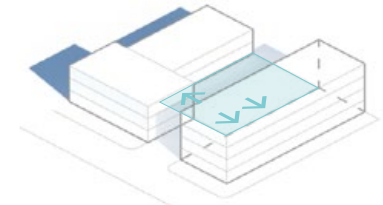
Separate access for different uses and users consolidates servicing areas allowing dedicated pedestrian and cycle access from the street. Providing multiple access points can radically improve accessibility of an industrial estate.



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

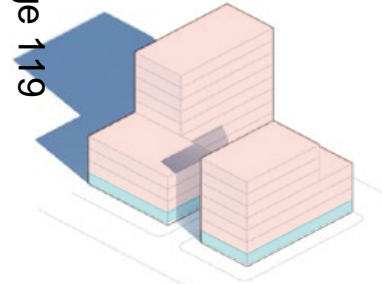


Provide positive active frontages: Active uses or operational making areas should be positioned at ground floor level along the street. Ensure high levels of visual permeability of ground floor uses adjacent to the street.

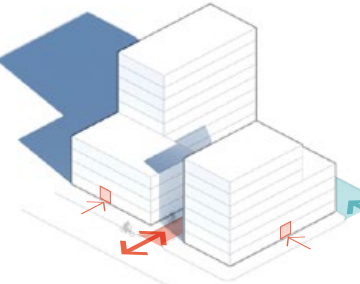


Provide service yards, catered to the types of occupiers: Incorporate sufficient space for HGVs to turn (where appropriate). Where occasional HGV access is required, consider shared parking.

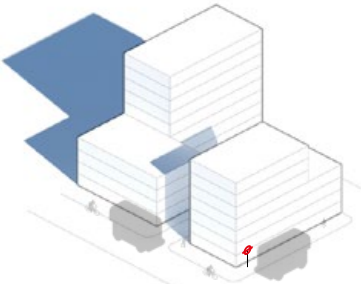
Industrial Co-location



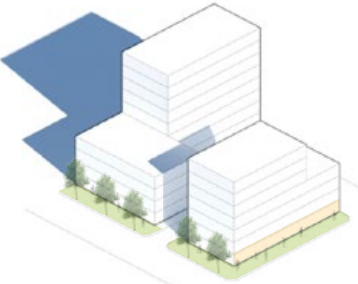
Consider different types of mix and co-location. This includes mixing at neighbourhood level, block level (horizontal mix) and building level (vertical mix). Understanding the specific requirements for each location should help make the most of each different approach.



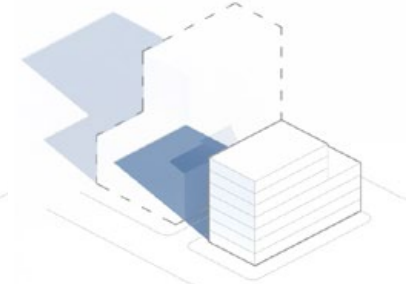
Separate access for different uses and users, consolidating servicing areas and providing dedicated access to allow separate pedestrian and cycle access from the street. Locate residential entrances and units along the street edge to provide positive street frontage.



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



Support place-making. Provide quality urban environment and amenities for workers making better use of open spaces. Ensure there is a positive relationship with neighbours.



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

5.4 Building Design and Architecture

Development Principles

Scale, Character and Typology

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

Context

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



Figure 47 – Church Road. Brent Image Library



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

5.4 Building Design and Architecture

Development Principles

Heritage

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

on Figure 52. In particular, the southern parade (176-216 Church Road) of Church End Local Centre retains many original Edwardian polychrome features. Adjacent to the CEGA are a number of designated heritage assets including St. Mary's Church (listed Grade II*), Willesden Jewish Cemetery (listed Grade II) and Willesden New Cemetery (locally listed).

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



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



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



Figure 51 – Shortcroft Mead Courtin. Street View

Context

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

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

5.4 Building Design and Architecture

Existing Framework

Heritage

Key

- Listed
- 1

St Mary's Church: Listed Grade II*
- 2

Willesden Jewish Cemetery: Listed Grade II*
- Locally listed
- 3

Shortcroft Mead Court
- 4

1 & 2 Church Cottages, Neasden Lane, NW10 9NL
- 5

Willesden Vestry Hall, Neasden Lane, NW10 2TS
- 6

Willesden New Cemetery
- 7

Willesden 7th Day Adventist Church, Glebe Road
- Buildings of townscape importance
- 8

Neasden Studios
- 9

Willesden Bus Depot Entrance (and memorial)
- 10

Willesden Jewish Cemetery – House of Life Visitor Centre
- 11

Hostel NR 8, A407, London NW10 2JT
- 12

The Crown, High Road
- 13

Abundante Vida Church High Road NW10 2EN
- 14

London Apollo Club, 375 High Rd, London NW10 2JR
- 15

214-132 Church Road
- 16

Brent Mencap 379-381 High Road, NW10

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

5.4 Building Design and Architecture

Existing Framework

Housing Typology

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

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Key

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

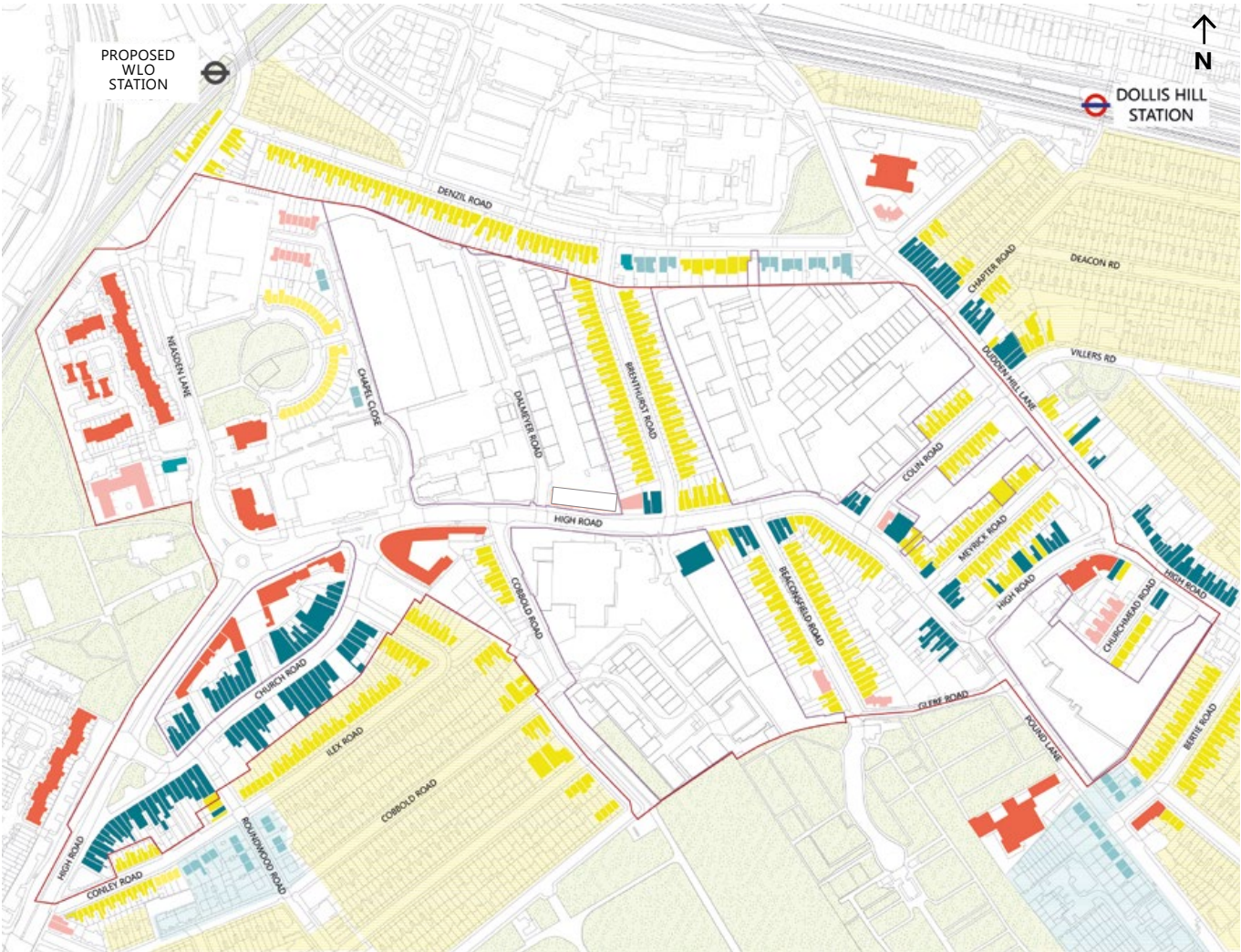


Figure 53 – Housing typologies. Adapted Hawkins\Brown Masterplan Report

5.4 Building Design and Architecture

Existing Framework

Building Condition

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

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

Page 124

Key

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

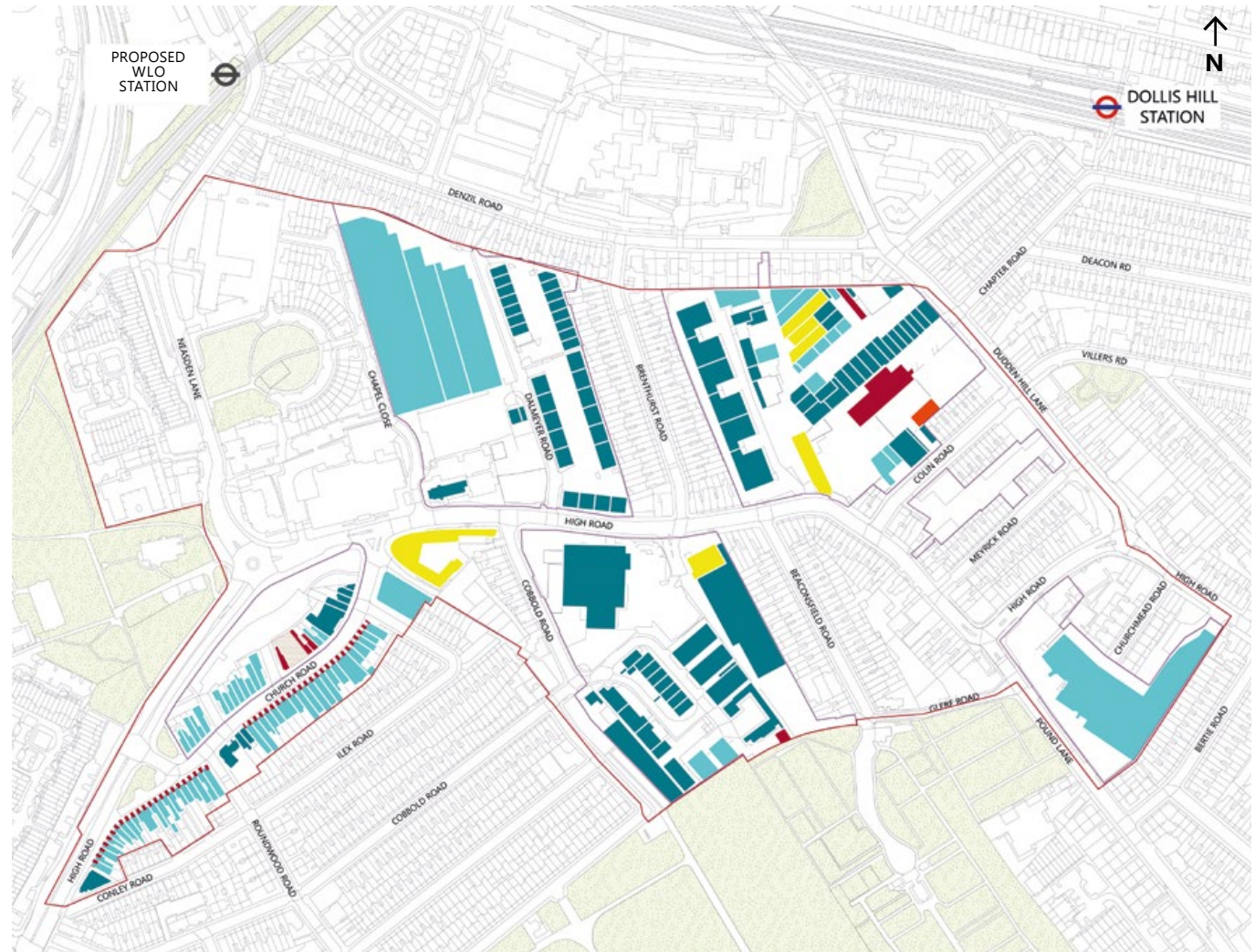


Figure 54 – Building condition. Adapted Hawkins\Brown Masterplan Report

5.4 Building Design and Architecture

Existing Framework

Building Heights

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

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

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

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

Key

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

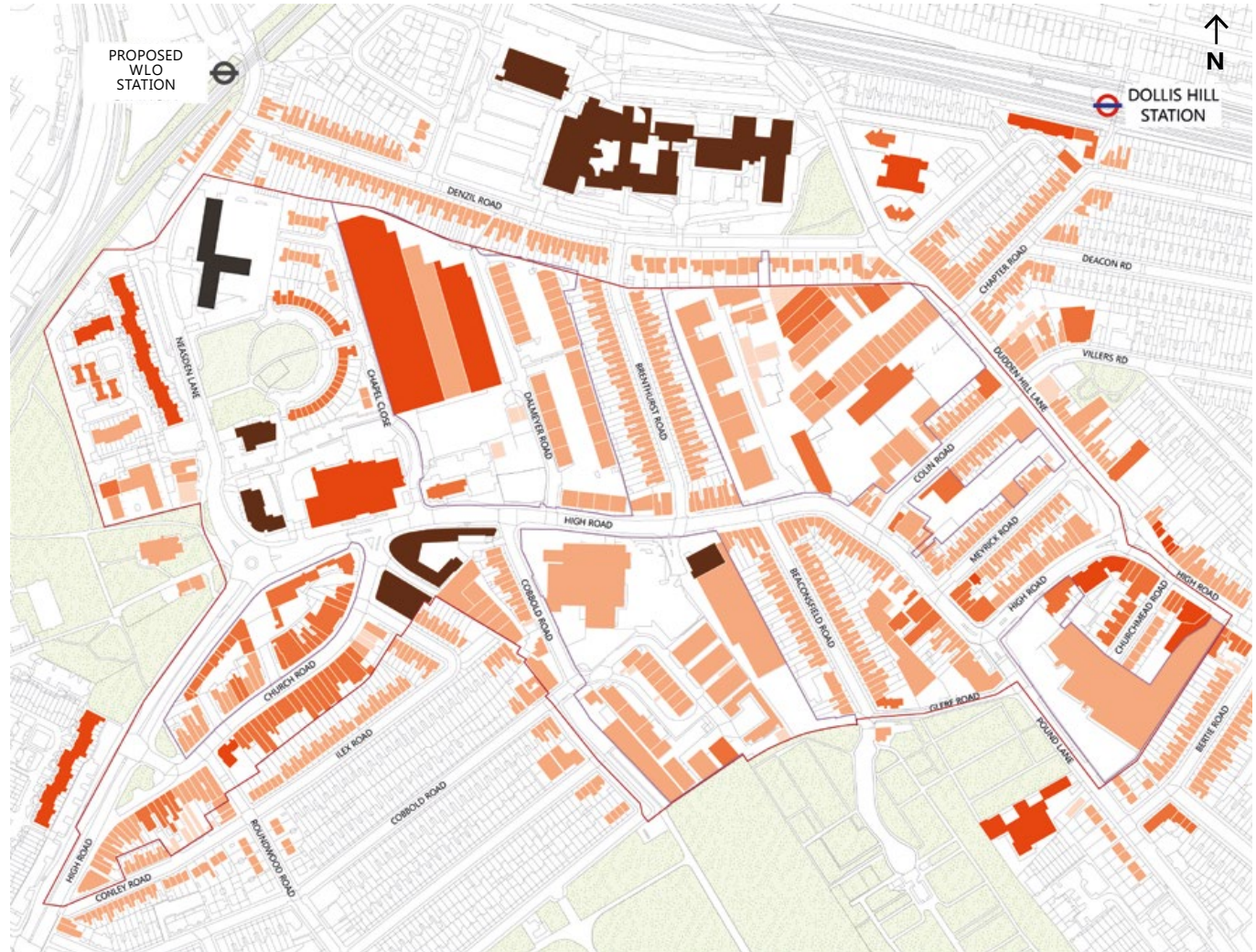


Figure 55 – Building heights. Adapted Hawkins\Brown Masterplan Report

5.4 Building Design and Architecture

Existing Framework

Planning Applications

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



Figure 56 – Planning Application 13/1098

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



Figure 57 – Withdrawn Planning Application

5.4.21 Chancel House is being replaced with a five-storey secondary school and separate sixth form building incorporating a MUGA (Multi Use Games Area) on the roof. North Brent School will take 900 pupils in Years 7 to 11, and 250 A-Level pupils. Works have started on site and opening date is expected by September 2024.



Figure 58 – Chancel House School Planning Application 19/2804

5.5 Climate Change and Sustainability

Development Principles

Objective

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

Resilient, Efficient and Healthy development

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

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

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

Context

5.5.2 In Brent, 35% of CO₂ emissions come from commercial or industrial buildings, 22% from road transport and 43% from homes. Data from the UK National Atmospheric Emissions Inventory indicate that particles from brake wear, tyre wear and road surface wear currently constitute 60% and 73% (by mass), respectively, of primary PM_{2.5}.

5 and PM₁₀ emissions from road transport, and will become more dominant in the future.

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



Figure 59 – Brent Climate Emergency Strategy Cover

5.5 Climate Change and Sustainability

Development Principles

Air Quality and Pollution

- Page 128
- **AQP1 Air quality positive:** All major developments within Growth Areas and Air Quality Focus Areas will be required to be Air Quality Positive. Where on site delivery of these standards cannot be met, off-site mitigation measures will be required. Design should be informed by a preliminary Air Quality Assessment and Air Quality Positive Statement to ensure air quality is considered from the outset. (Local Plan policy BSUI2)
 - **AQP2 Mitigation:** Adopt mitigation measures and design solutions, as set out in paragraph 5.6.6, to prevent or minimise exposure to existing air pollution and make provision to address local air quality problems. (London Plan policy SI1)
 - **AQP3 Construction impact:** Reduce the impact on air quality during the construction and demolition phases. (London Plan policy SI1)

Context

5.5.4 The majority of the borough is within an Air Quality Management Area (AQMA). Brent meets

all national air quality targets except on two pollutants; nitrogen dioxide (NO₂) and particulate matter (PM10). Church End falls within one of the four Air Quality Focus Areas (AQFA) designated by the Council.

- 5.5.5 The largest contributors to poor air quality are road transport, local energy generation and construction. CEGA is particularly affected by these factors due to the existing road network (A407 High Road, B453 Neasden Lane) and industrial sites activities.
- 5.5.6 Mitigation measures should be considered at the earliest stage of the design process, including, but not limited to the following:
- Developments should not be designed with windows solely facing onto busy roads, such as Neasden Lane and A407 High Road;
 - The shape, orientation, height and location of building footprint on site to enable airflow to disperse pollution from local sources;
 - Designing the layout of the site with generous street widths so that pollution does not get trapped in narrow spaces between tall buildings;

- Outdoor spaces located within low pollutant concentrations areas or where the development creates healthy conditions;
- Reduce exposure in public realm by adopting healthy streets approach;
- Green infrastructure in the right place to reduce exposure to air pollution;
- Triple glazed windows;
- Maximise natural ventilation and avoiding single aspect units.



Figure 60 – View to Wembley Park. Brent Library Image

5.5 Climate Change and Sustainability

Development Principles

Agent of Change and Contamination

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

Context

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

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

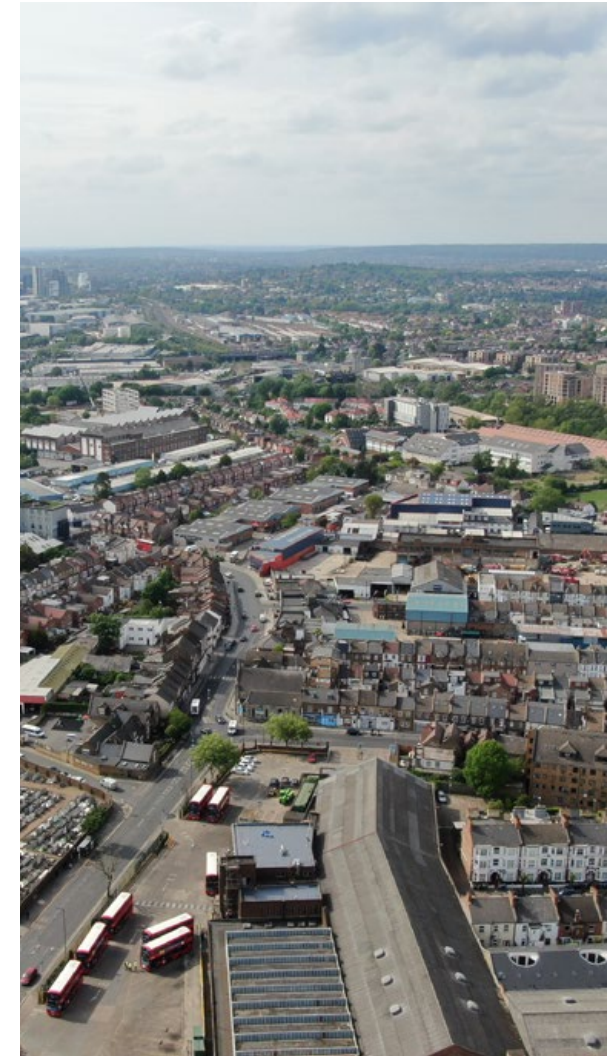


Figure 61 – Bird Eye View: Church End. Vizable 3d

5.5 Climate Change and Sustainability

Development Principles

Waste

- **W1 Waste reduction:** Reduce waste and apply circular economy principles. (London Plan policy SI7)
- **W2 Circular economy:** Development should seek to reduce life-cycle carbon emissions. In the first instance, considering if the retention and retrofit of existing buildings is appropriate to achieve both sustainability and wider policy objectives. Proposals referable to the Mayor should be accompanied by a Whole Life Cycle Carbon Assessment. (London Plan policy SI7)
- **W3 Storage:** Carefully consider refuse storage and collection systems that support recycling, in the context of a mixed-use industrial and residential development. Development should be supported by a Site Waste Management Plan and Operation Waste Management Plan. (London Plan policy D6, SI7 and SI8).

Context

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

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



Figure 62 – Waste Collection. Brent Library Image

5.5 Climate Change and Sustainability

Development Principles

Flooding and Water management

- **FW1 Flood Risk Assessment:** Be resistant and resilient to all forms of flooding, taking into account climate change allowance, and not increase the risk of flooding elsewhere. Sites within Flood Zone 2 or 3, or designated Critical Drainage Areas should be supported by a Flood Risk Assessment. (Local Plan policy BSUI3)
- **FW2 Sustainable Drainage:** Reduce impact on the current drainage regime through a Sustainable Drainage Strategy, to manage the flow and rate of surface water entering drains and sewers through infiltration methods. Methods used should prioritise naturalised Sustainable Urban Drainage Systems (SUDS) and should be incorporated into public realm buffer strips within developments sites as well as integrated in the public highway space where possible. (London Plan policy SI13, Local Plan policy BSUI4)
- **FW3 Consumption:** Achieve the target for mains water consumption of 105 litres or less per person per day and be supported by a Water Efficiency Assessment. This is required

to be secured via condition. To achieve this, developments should incorporate water management methods such as smart metering, water-saving and greywater recycling. (Local Plan policy BSUI4)

- **FW4 Supply:** Demonstrate sufficient water supply and wastewater disposal capacity to minimise the impact on existing infrastructure, and ensure the separation of surface and foul water systems. The Water Utility provider (Thames Water) should be engaged at the earliest stage. (London Plan policy SI5)

Context

5.5.11 Small parts of land within CEGA are in Flood Zone 3a due to risk of surface water flooding. Areas affected include small parts of built up land and some highways like Chapel Close, Brenthurst Road, Beaconsfield Road and Church Road. In addition, all of CEGA falls within a Critical Drainage Area as defined in the Brent Surface Water Management Plan. Development offers an opportunity to address some of the noted sensitivities, including surface water flooding. Parts of CEGA at risk of flooding may


exacerbate the degree of risk downstream or within the surrounding community if new development increases the rate of surface water run-off.



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

6.0 Site Allocations

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

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

6.1 BSSA1: Asiatic Carpets

6.1 BSSA1: Asiatic Carpets

About The Site

Site Summary

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



Figure 64 – Access from Cygnus Industrial Estate. Hawkins\Brown Co-Location study



Figure 65 – View from Chapel Close. Hawkins\Brown Co-Location study

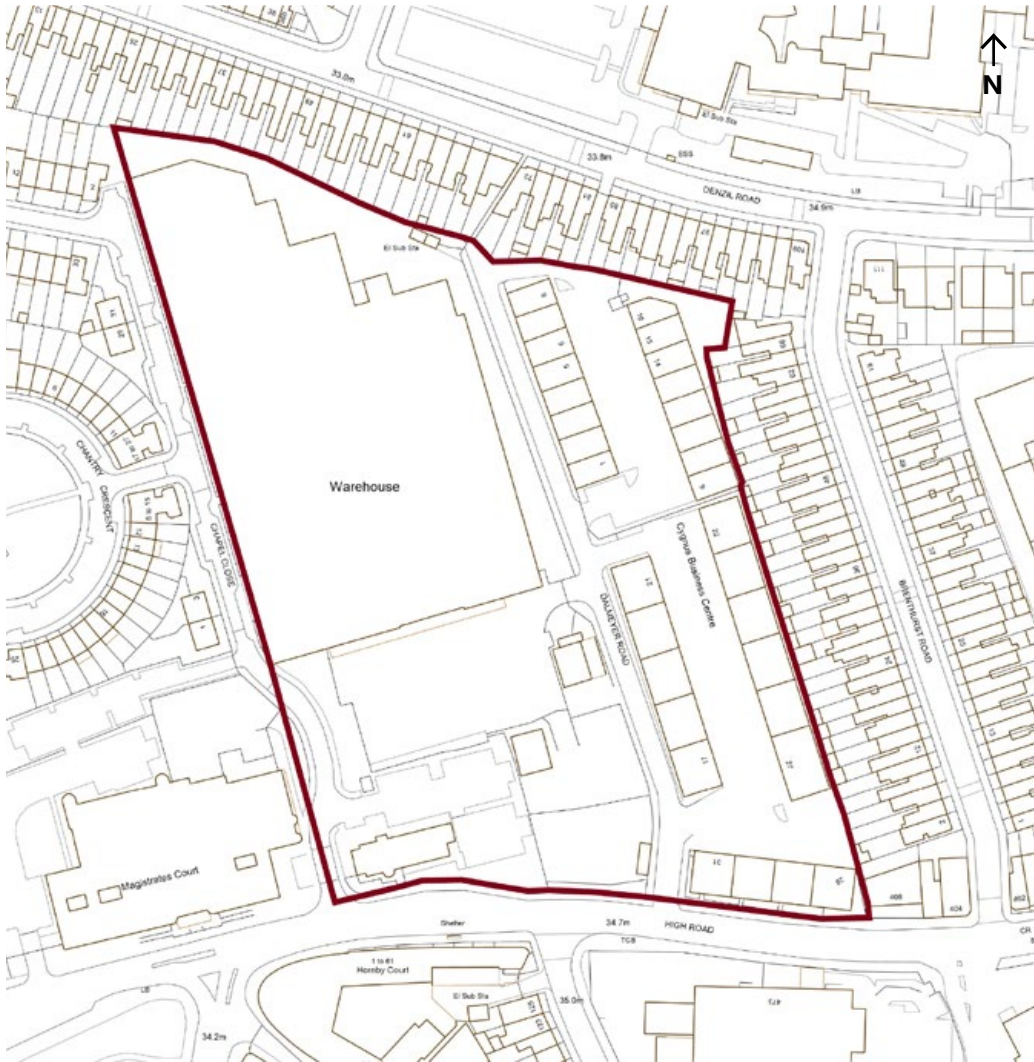


Figure 66 – Site Allocation BSSA1

6.1 BSSA1: Asiatic Carpets

Policy Requirements

Strategic Objective

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

Indicative Homes

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

Industrial Spaces and Affordable Workspaces

LES Site: On the Asiatic Carpets site to achieve the maximum viable replacement of the existing employment floorspace. The retention of the film and production function around Neasden Studios is strongly encouraged.

LSIS Site: On the Cygnus Business Centre site retain existing businesses where possible, ensuring industrial floorspace is intensified and access to a consolidated shared service yard is retained. 10% of new industrial floorspace is to be affordable.

Planning Considerations

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

Site specific geology will need to be considered for developments where deep piled foundations are proposed. Potential need for a Foundation Works Risk Assessment (FWRA) could be required to ensure that the risks to groundwater are minimised.

Green, Open and Play Spaces

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

Community Spaces

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

Building Heights

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

6.1 BSSA1: Asiatic Carpets

Proposed Framework

Design Principles

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

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Proposed Massing



Figure 67 – Proposed Massing BSSA1 indicating 2-10 storeys (6m-30m). Hawkins\Brown Masterplan Report

Key

- | | | | |
|---|--|-----------------------------|--------------------|
| ● Industrial B2/B8/E – existing | ● E(c)/E(g) – Commercial offices, workspace and professional service | ● C3 – Residential | ■ Site Boundary |
| ● Shared yard for industrial uses | ● F – Community and Learning | ● New green and open spaces | ○ Building Heights |
| ● E(g) – Uses which can be carried out in a residential area without detriment to its amenity: incl. light industrial | ● E(a)/(b)/(c) and sui generis – Retail, F&B and services | ● Public realm | |

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

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

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

About The Site

Site Summary

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



Figure 68 – Frontage from the High Road. Hawkins\Brown Co-Location study



Figure 69 – Frontage from the High Road. Hawkins\Brown Co-Location study



Figure 70 – BSSA2 Site Allocation Boundary Map

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

Policy Requirements

Strategic Objective

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

Indicative Homes

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

Industrial Spaces and Affordable Workspaces

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

Planning Considerations

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

Site specific geology will need to be considered for developments where deep piled foundations are proposed. Potential need for a Foundation Works Risk Assessment (FWRA) could be required to ensure that the risks to groundwater are minimised.

Green, Open and Play Spaces

- 1x 0.1ha open/green space +
 - 1x 100 sqm LAP +
 - 1x 0.05ha rooftop food growing +
 - 1x 0.05ha rooftop sports pitch
- As per figure 34.

Community Spaces

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

Building Heights

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

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

Proposed Framework

Design Principles

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

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Create dynamic and architecturally rich active frontages along all pedestrian routes to maximise pedestrian's safety. When blank facades are unavoidable, development should draw on characterful exemplars, demonstrating how safety will be upheld.

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

Proposed Massing

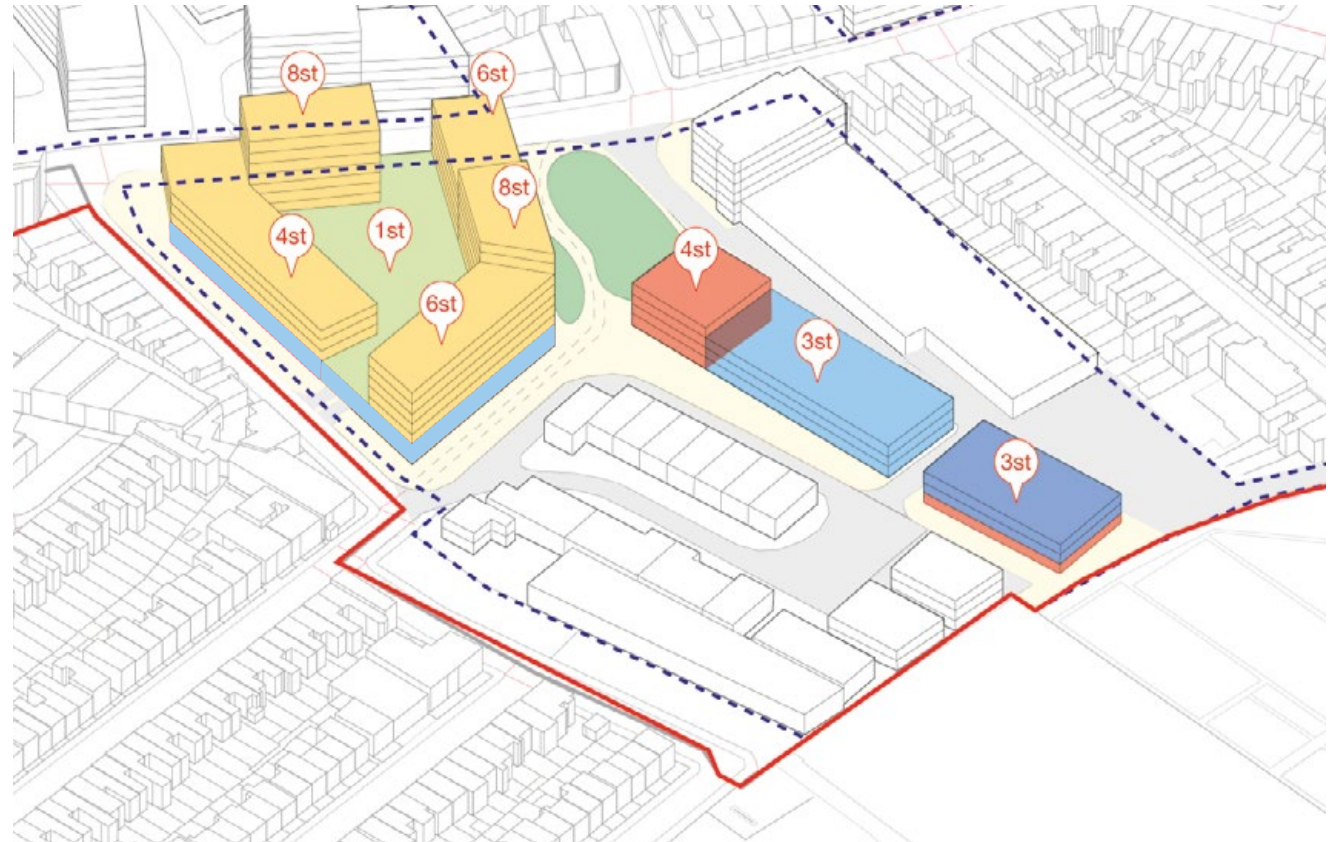


Figure 71 – Proposed Massing BSSA2 indicating 3-8 storeys (9m-24m).

Key

Industrial B2/B8/E – existing	E(c)/E(g) – Commercial offices, workspace and professional service	C3 – Residential	Site Boundary
Shared yard for industrial uses	F – Community and Learning	New green and open spaces	Building Heights
E(g) – Uses which can be carried out in a residential area without detriment to its amenity: incl. light industrial		Public realm	

An aerial photograph of a city, likely Glasgow, with a green tint. The image shows a dense urban area with a mix of residential and commercial buildings. In the foreground, there are several modern, multi-story buildings with green roofs. In the background, a large stadium (Glasgow Celtic Park) is visible, along with other high-rise buildings. The text '6.3 BSSA3: Church End Local Town Centre' is overlaid in white, bold font on the left side of the image.

6.3 BSSA3: Church End Local Town Centre

6.3 BSSA3: Church End Local Town Centre

About The Site

Site Summary

Item	Description
About the site	Church End Local centre contains a number of organisations and spaces which serve the community including Catalyst Housing Association, Afghan Islamic Cultural Centre, Markaz Darul Hadith Learning Centre and Beulah Apostolic Church. Alongside Church End Market and the shops, cafes and takeaways other notable uses in the Town Centre include the TBN UK recording studio. St. Mary's Willesden Church and Willesden Magistrates' Court are to the north of the site. The church hosts a number of organisations within its facilities including Brent Foodbank run by the Trussell Trust and Happy Hands Montessori Nursery.
Site area	0.97ha
Built floorspace	4,288m ²
Businesses	70
Jobs	215-304 (HCA official estimate)
Existing homes	32



Figure 72 – Church Road Shops. Brent Library Image



Figure 73 – Church Road. Brent Library Image

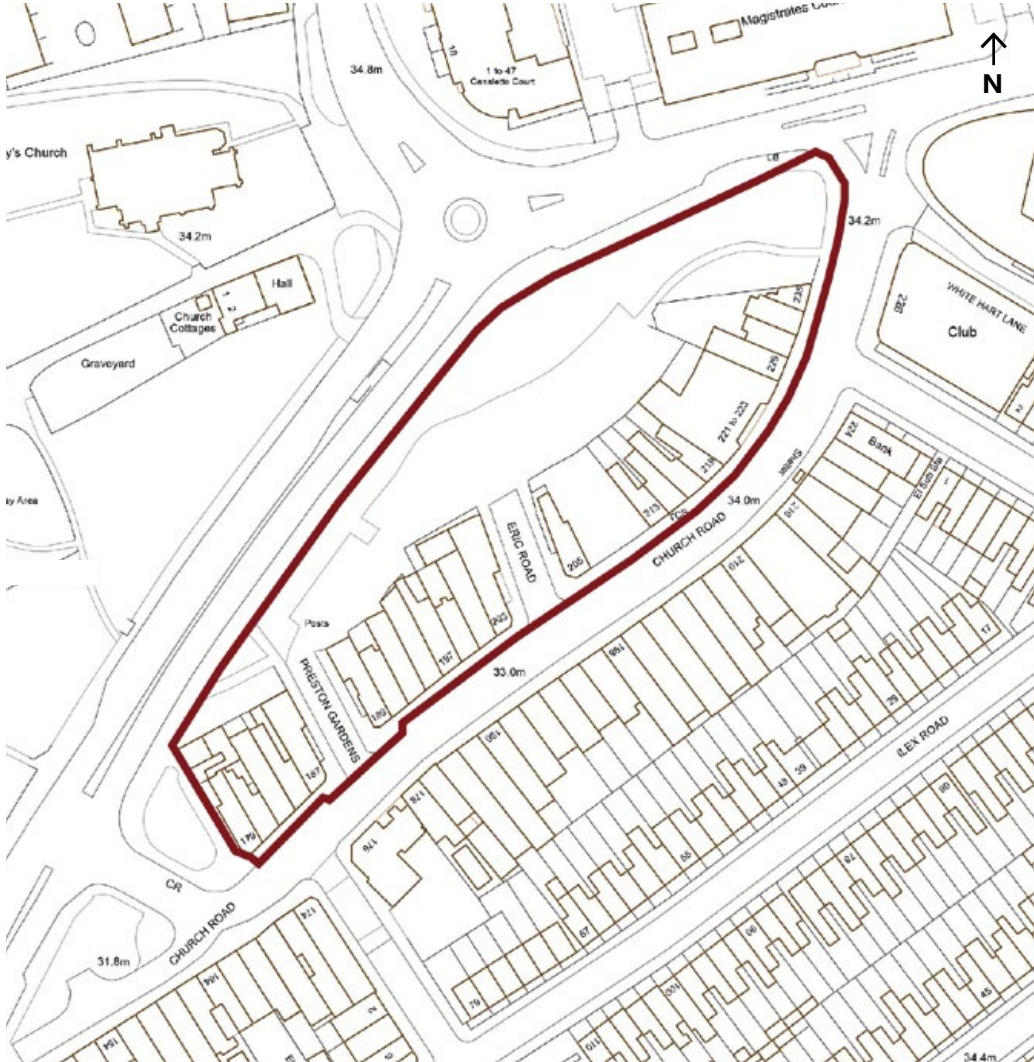


Figure 74 – BSSA3 Site Allocation Boundary Map

6.3 BSSA3: Church End Local Town Centre

Policy Requirements

Strategic Objective

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

Indicative Homes

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

Commercial Spaces

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

Planning Considerations

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

Green, Open and Play Spaces

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

As per figure 34.

Community Spaces

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

Building Heights

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

6.3 BSSA3: Church End Local Town Centre

Proposed Framework

Design Principles

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

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Proposed Massing

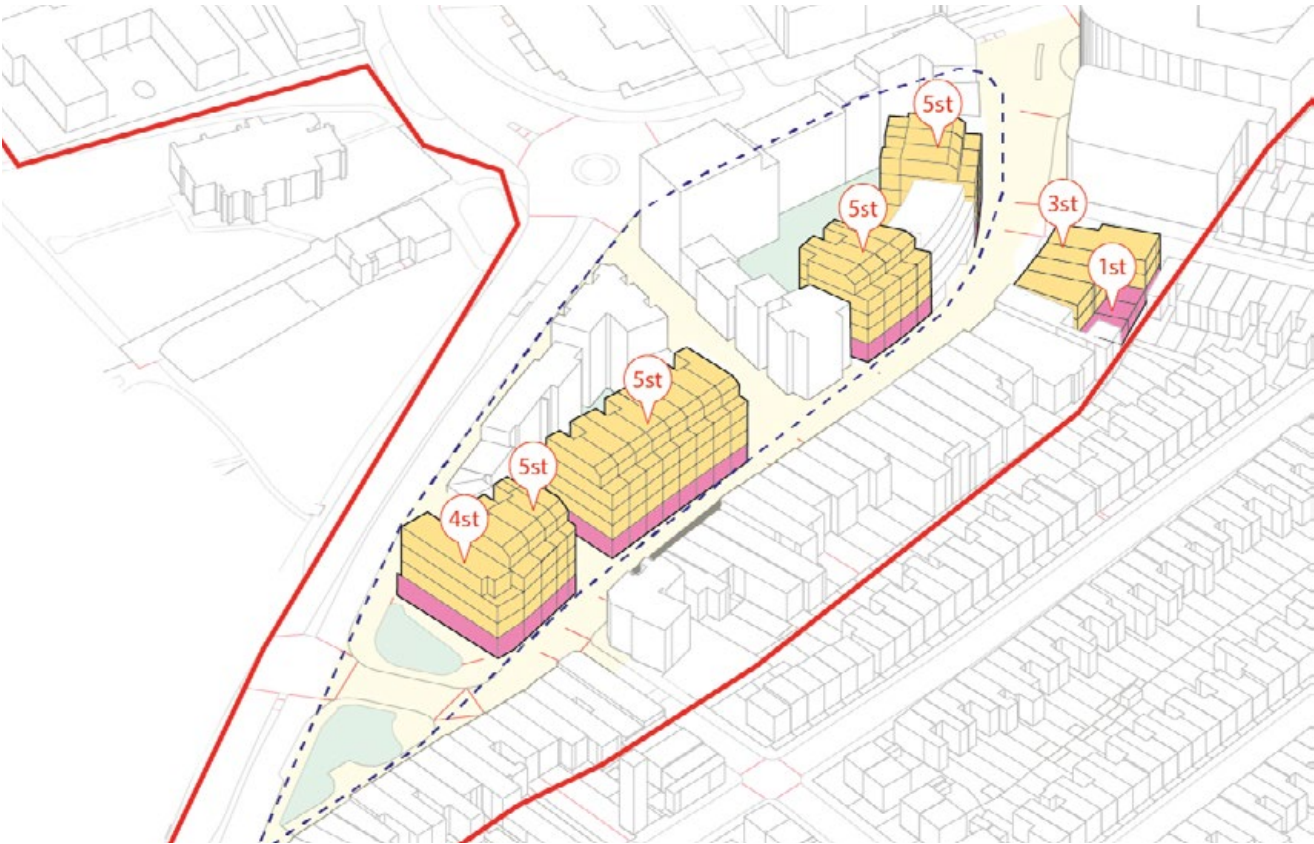


Figure 75 – Proposed Massing BSSA3 indicating 3-5 storeys (9m-15m). Hawkins\Brown Masterplan Report

Key

- C3 – Residential
- E(a)/(b)/(c) and sui generis – Retail, F&B and services
- New green and open spaces to its amenity: incl. light industrial
- Site Boundary
- 📍 Building Heights

An aerial photograph of a city, likely London, showing a mix of modern and traditional architecture. In the foreground, there are several modern, multi-story apartment buildings with glass and concrete facades. Some of these buildings have green roofs. In the background, there are older, more traditional buildings with red brick and tiled roofs. The city is densely packed with buildings, and there are some trees scattered throughout. The overall tone of the image is somewhat muted, with a greenish tint.

6.4 BSSA4: Chapman's and Sapcote Estate

6.4 BSSA4: Chapman’s and Sapcote Estate

About The Site

Site Summary

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



Figure 76 – Access from the High Road.
Hawkins\Brown Co-Location study



Figure 77 – Small wholesale units.
Hawkins\Brown Co-Location study

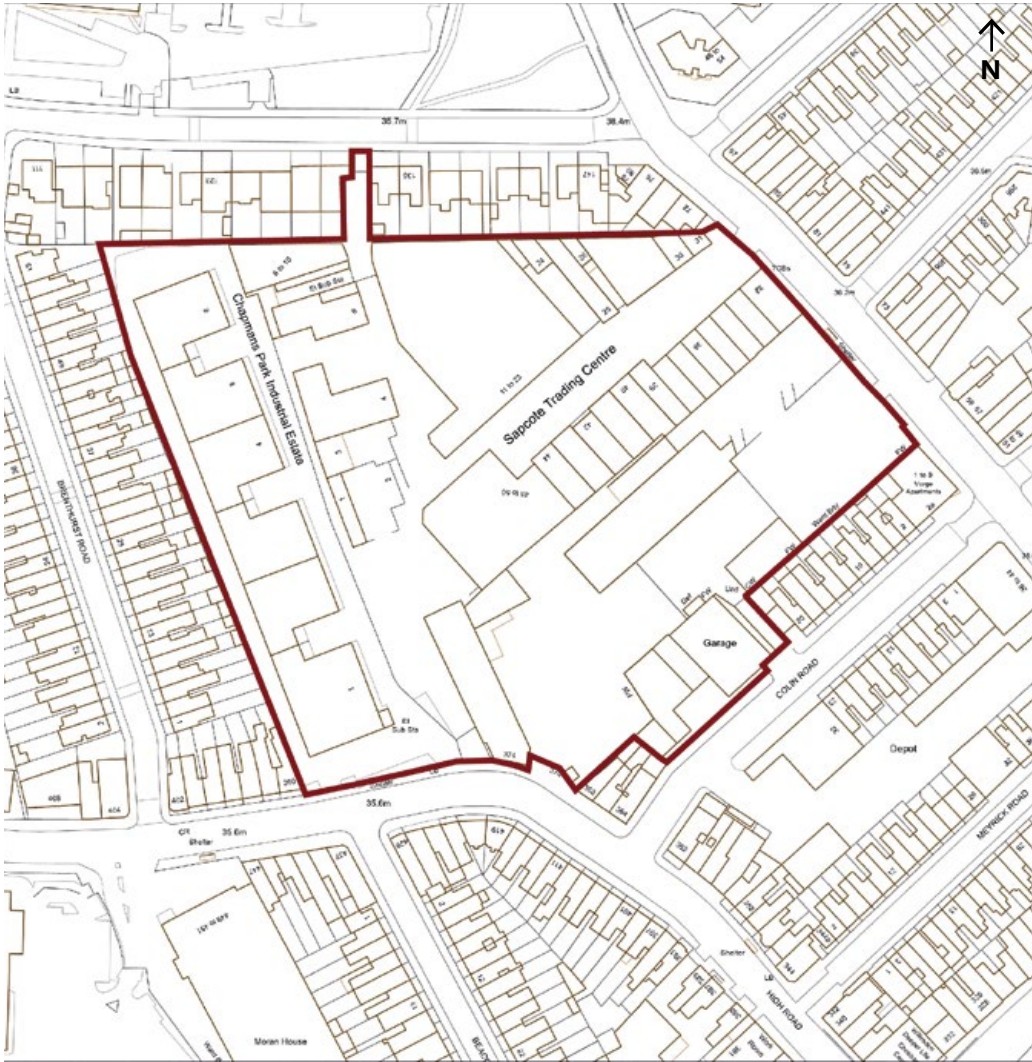


Figure 78 – BSSA4 Site Allocation Boundary Map

6.4 BSSA4: Chapman’s and Sapcote Estate

Policy Requirements

Strategic Objective

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

Indicative Homes

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

Green, Open and Play Spaces

Due to the nature of the site there is limited scope for introducing new green spaces. Landscaping improvements should be focussed on the adjacent stretch of High Road and tree planting and greening maximised throughout the site. We will support schemes that provide pocket parks and other creative green interventions i.e. roof gardens if those can be sheltered from industrial uses and appropriate mitigations to noise and air pollution are in place. Financial contributions will be required towards open space off-site and play provision.

Industrial Spaces and Affordable Workspaces

LSIS: Retain existing businesses within Sapcote Trading Centre, ensuring industrial floorspace is reprovided and intensified. 10% of new industrial floorspace is to be affordable.

Community Spaces

New workspace to be delivered within new development on the site should aim to provide a business support function and deliver community benefits.

Planning Considerations

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

Site specific geology will need to be considered for developments where deep piled foundations are proposed. Potential need for a Foundation Works Risk Assessment (FWRA) could be required to ensure that the risks to groundwater are minimised.

Building Heights

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

6.4 BSSA4: Chapman's and Sapcote Estate

Proposed Framework

Design Principles

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

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Proposed Massing

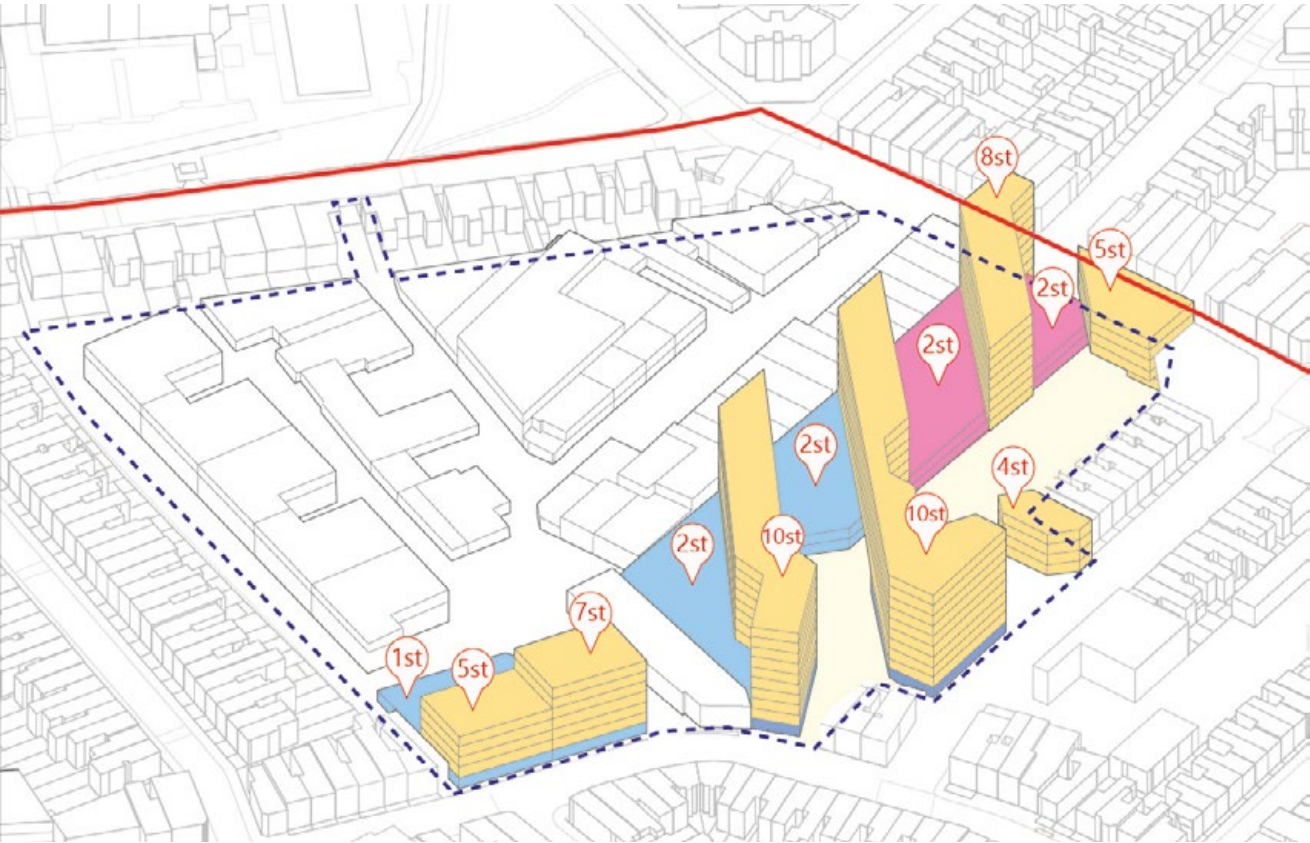



Figure 79 – Proposed Massing BSSA4 indicating 1-10 storeys (3m-30m). Hawkins\Brown Masterplan Report

Key

- | | | |
|---|---|--------------------|
| ● Industrial B2/B8/E – existing | ● E(a)/(b)/(c) and sui generis – Retail, F&B and services | ● Public realm |
| ● E(g) – Uses which can be carried out in a residential area without detriment to its amenity: incl. light industrial | ● E(c)/E(g) – Commercial offices, workspace and services | ● Site Boundary |
| | ● C3 – Residential | ● Building Heights |

An aerial photograph of a city street scene. In the foreground, a modern, multi-story building with a green roof is visible. The building has a dark facade and a flat roof covered in green vegetation. To the left of the building, there is a street with a red double-decker bus and a white van. In the background, there are more buildings, including a large, modern building with a green roof. The overall scene is a mix of urban architecture and greenery.

6.5 BSSA5: Willesden Bus Depot

6.5 BSSA5: Willesden Bus Depot

About The Site

Site Summary

Item	Description
About the site	The site comprises a Transport for London Bus Depot and the long-term vacant Crown Public House. The Bus garage is privately owned by Metroline and operating TfL services. The garage operates over 100 buses and employs around 300 people including drivers, engineering and admin staff. It is an important site for the bus network and is currently protected from redevelopment that does not maintain its use as an operational bus garage with equivalent or increased capacity.
Site area	0.99ha
Built floorspace	5,493sqm
Businesses	1
Jobs	137-183 (HCA official estimate)
Existing homes	0



Figure 80 – Sideway Entrance. Street view



Figure 81 – The Crown Pub. Street view



Figure 82 – BSSA5 Site Allocation Boundary Map

6.5 BSSA5: Willesden Bus Depot

Policy Requirements

🔗 Strategic Objective

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

🏠 Indicative Homes

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

🌿 Green, Open and Play Spaces

Due to the nature of the site there is limited scope for introducing new green spaces. Instead the focus should be on improvements to the adjacent stretch of High Road which suffers from narrow pavements and restricted space for a heavily used bus stop. Financial contributions will be required towards off-site open space and play provision.

🏭 Industrial Spaces and Affordable Workspaces

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

❤️ Community Spaces

The pub or alternative community function should be retained through meanwhile use and redevelopment of the vacant Crown Public House (approx. 480sqm). Should the loss of the public house use be justified under policy BHC5, the preferred alternative use is community use and/or employment floorspace.

📋 Planning Considerations

Air Quality Management Area, Contamination Risk, impact on setting of heritage assets. Any proposals would need to be consistent with London Plan Policy T3 and London Plan Guidance (LPG) on Sustainable Transport, Walking and Cycling. The Agent of Change principle would be applied to any redevelopment to ensure adequate protection for residents or occupiers, taking into account the 24/7 nature of bus garage operations.

Site specific geology will need to be considered for developments where deep piled foundations are proposed. Potential need for a Foundation Works Risk Assessment (FWRA) could be required to ensure that the risks to groundwater are minimised.

🏢 Building Heights

Buildings heights to vary between 5-7 storeys. The Bus Depot site is adjacent to residential terraces, so massing should be treated carefully.

6.5 BSSA5: Willesden Bus Depot

Proposed Framework

Design Principles

- Create active frontages along the High Road, helping to join up disparate clusters of retail, commercial and industrial uses in the surrounding area.
- Activate the vacant public house through the provision of 'meanwhile' uses, retaining public-facing uses at ground floor level and exploring the potential for residential uses above.
- The retention of the Edwardian entrance and war memorial is strongly encouraged. Development should take influence from the positive characteristics of the heritage assets within and surrounding the site. The Crown, a former Edwardian public house in the Tudorbeathen style, is also a building of townscape importance.
- Explore the potential for amenity spaces internally and/or at roof level, given the site constraints.
- Minimise the impact of new development on the day-to-day operation and servicing of the existing businesses.

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Proposed Massing

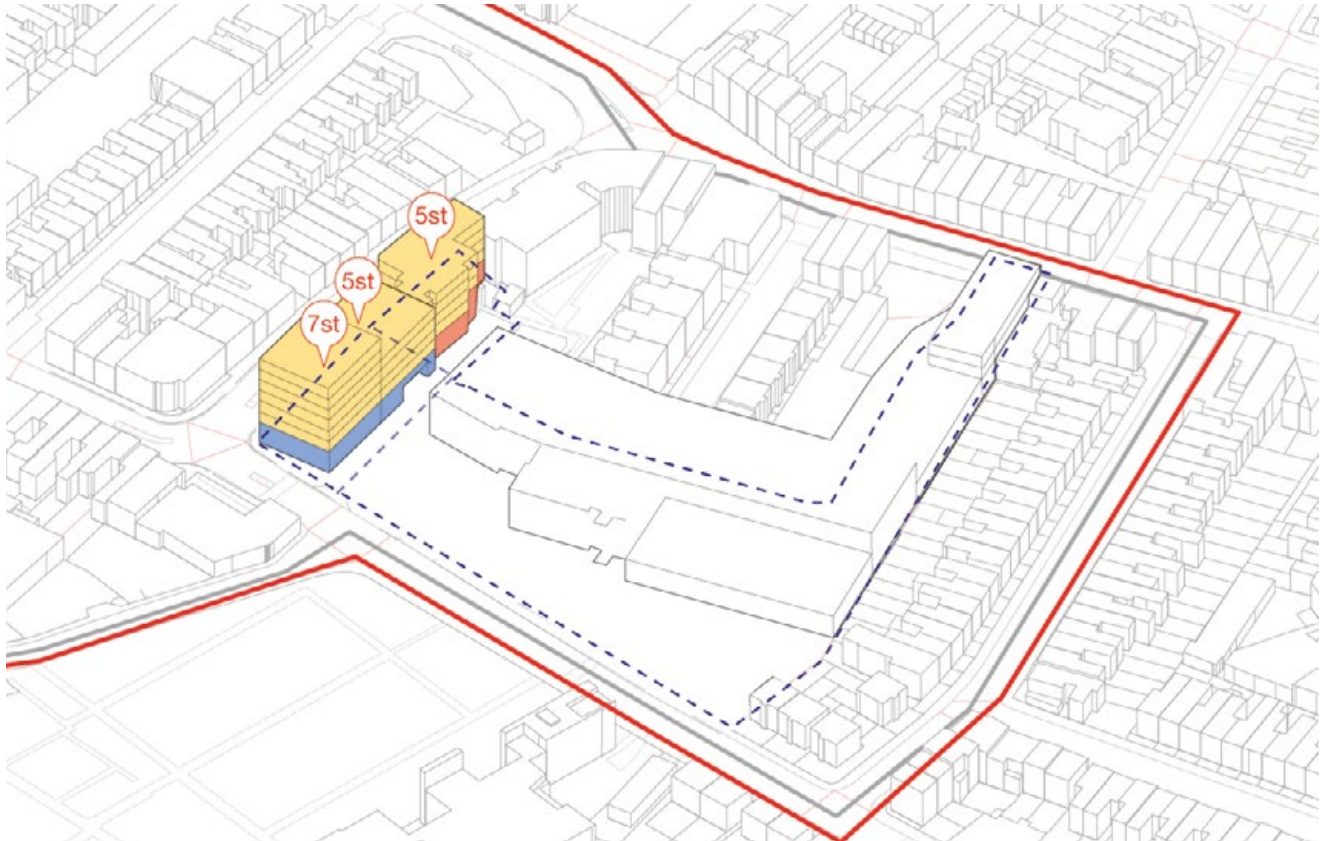



Figure 83 – Proposed Massing BSSA5 indicating 5-7 storeys (15m-21m). Hawkins\Brown Masterplan Report

Key

- E(c)/E(g) – Commercial offices, workspace and professional service
- F – Community and Learning
- C3 – Residential
- Site Boundary
- 📍 Building Heights

An aerial photograph of a city neighborhood. In the foreground and middle ground, there are several modern, multi-story buildings with flat roofs and large windows. Some of these buildings have green roofs. In the background, there is a dense cluster of older, traditional houses with gabled roofs and brick facades. The image is overlaid with a semi-transparent green filter. The text '6.6 BSSA8: McGovern's Yard' is prominently displayed in the upper left quadrant.

6.6 BSSA8: McGovern's Yard

6.6 BSSA8: McGovern’s Yard

About The Site

Site Summary

Item	Description
About the site	The site comprises light industrial uses around a central car park and servicing area. Key occupiers include Slocombes vehicle servicing and McGovern Haulage Ltd.
Site area	0.37ha
Built floorspace	1,402sqm
Businesses	1
Jobs	137-183 (HCA official estimate)
Existing homes	3



Figure 84 – Access from Colin Road. Street view



Figure 85 – View from Meyrick Road. Street view

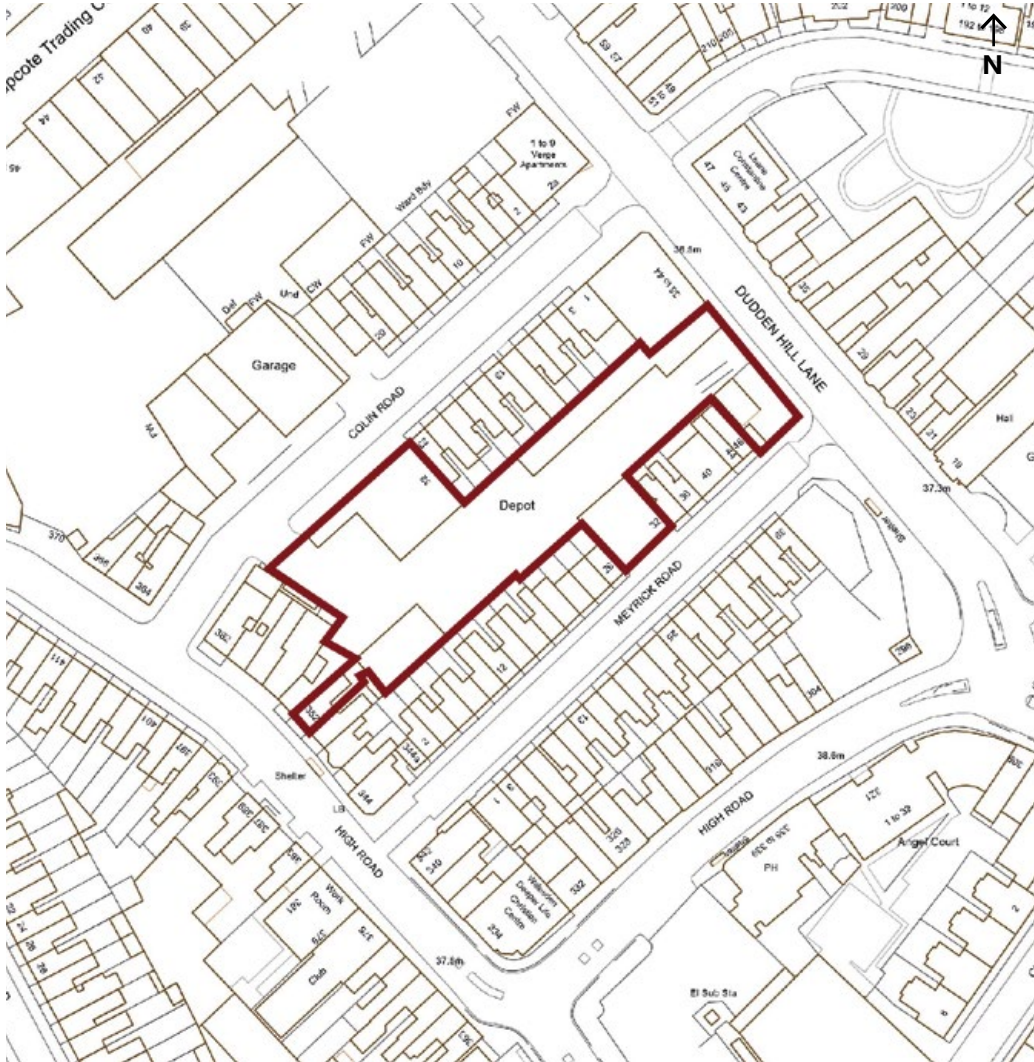



Figure 86 – BSSA8 Site Allocation Boundary Map

6.6 BSSA8: McGovern’s Yard


Policy Requirements

🔗 Strategic Objective


Deliver a mixed-use development to re-provide light industrial uses with residential above. and introduce new local amenity and work-space.

**Indicative Homes**

Indicative target of 45 homes, to provide a mixed community including affordable housing (target 50% affordable with a 70:30 social/intermediate split) and 25% family (3bed+) housing.

**Industrial Spaces and Affordable Workspaces**

Re-provide industrial uses where possible with an aim to increase industrial floorspace.


**Planning Considerations**

Air Quality Management Area, Contamination Risk.


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**Green, Open and Play Spaces**

Due to the nature of the site there is limited scope for introducing new green spaces. Green roofs, green walls, tree planting and elements that support biodiversity are encouraged. Financial contributions will be required towards off-site open space and play provision.

**Community Spaces**

Due to the nature of the site there is limited scope for introducing new community spaces.

**Building Heights**

Buildings heights to vary between 2-7 storeys. Development will need to be sensible to the adjacent residential homes.

6.6 BSSA8: McGovern's Yard

Proposed Framework

Design Principles

- Concentrate new development along the edge of the site, near main roads, to complete the perimeter block.
 - Limit new development within the core of the site, which is constrained by narrow width and sensitive edges.
 - Re-provide industrial uses where possible with an aim to increase employment floorspace.
 - Consolidate shared service yards around both existing provision and access points, supporting the clustering of industrial uses.
- Support the clustering of public-facing uses towards Dudden Hill Lane

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Proposed Massing

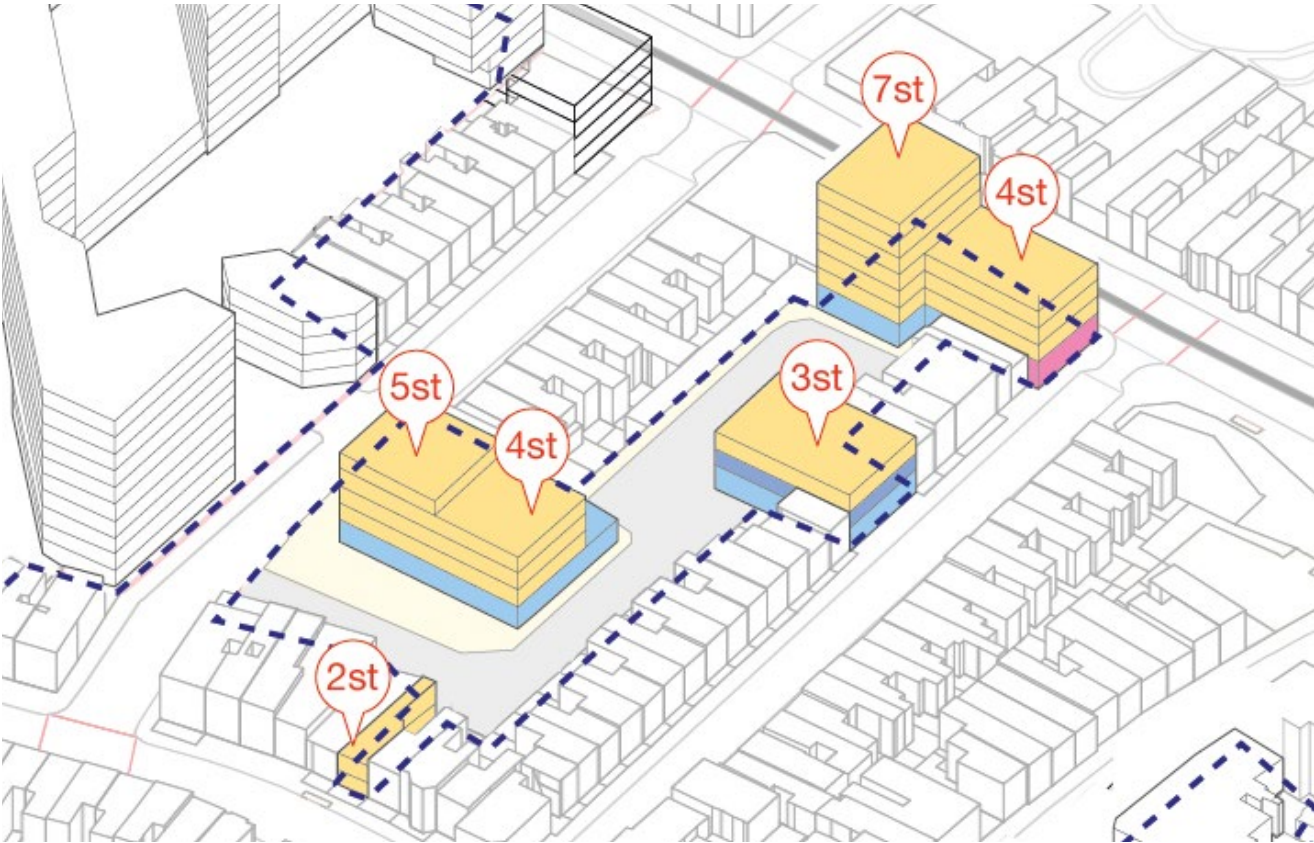


Figure 87 – Proposed Massing BSSA8 indicating 2-7 storeys (6m-21m) (Hawkins\Brown Masterplan Report)

Key

- | | | |
|---|--|---|
| ● E(g) – Uses which can be carried out in a residential area without detriment to its amenity: incl. light industrial | ● E(a)/(b)/(c) and sui generis – Retail, F&B and services | ■ Site Boundary |
| ● E(c)/E(g) – Commercial offices, workspace and professional service | ● C3 – Residential | ○ Building Heights |
| | ● Public realm | |

7.0 Delivery Approach and Phasing

- 7.1 Community Involvement
- 7.2 Land Ownership
- 7.3 Land Consolidation Strategy
- 7.4 Indicative Phasing
- 7.5 Decant and Business Relocation Strategy

7.1 Community Involvement

7.1.1 Community engagement and ownership will be key to the successful realisation of the vision for CEGA. Developers are required to adopt a clearly-articulated approach to community engagement, taking into account the diversity of Church End's community. As English may not be the first language, engagement materials should be communicated through a combination of clear visual material and summary text highlighting key information. A hybrid approach is needed which combines both digital and in person engagement, as many residents and workers do not have access to or use digital consultation platforms.

7.1.2 Lessons learnt from the initial masterplanning work, which developers should draw on include:

Hybrid approach: Combining both digital and in person engagement, as many residents and workers do not have access to or do not use digital consultation platforms.

- Existing networks: Partnerships with community groups should be facilitated, including to help engage harder to reach groups.
- Translate the process of change to individuals and lives: 'Day in the life' type scenarios are useful to translate the conditions before and after regeneration.

- Diverse audiences: As English may not be the first language, engagement materials should be communicated through a combination of clear visual material and summary text highlighting of key information.

7.1.3 Mechanisms to promote community ownership of workspace, community and cultural facilities and public space are strongly encouraged. Developers should seek to co-design these spaces in collaboration with local people, including young people. Community Agreements will be secured setting out how local people and existing community groups will be engaged in the operation of new Use community spaces and meanwhile uses. This could include through involvement in the development of a programmes of services and activities. In the case of cultural or employment uses, training and employment opportunities for local people will also be secured.



Figure 88 – CEGA Masterplan – Autumn Exhibition

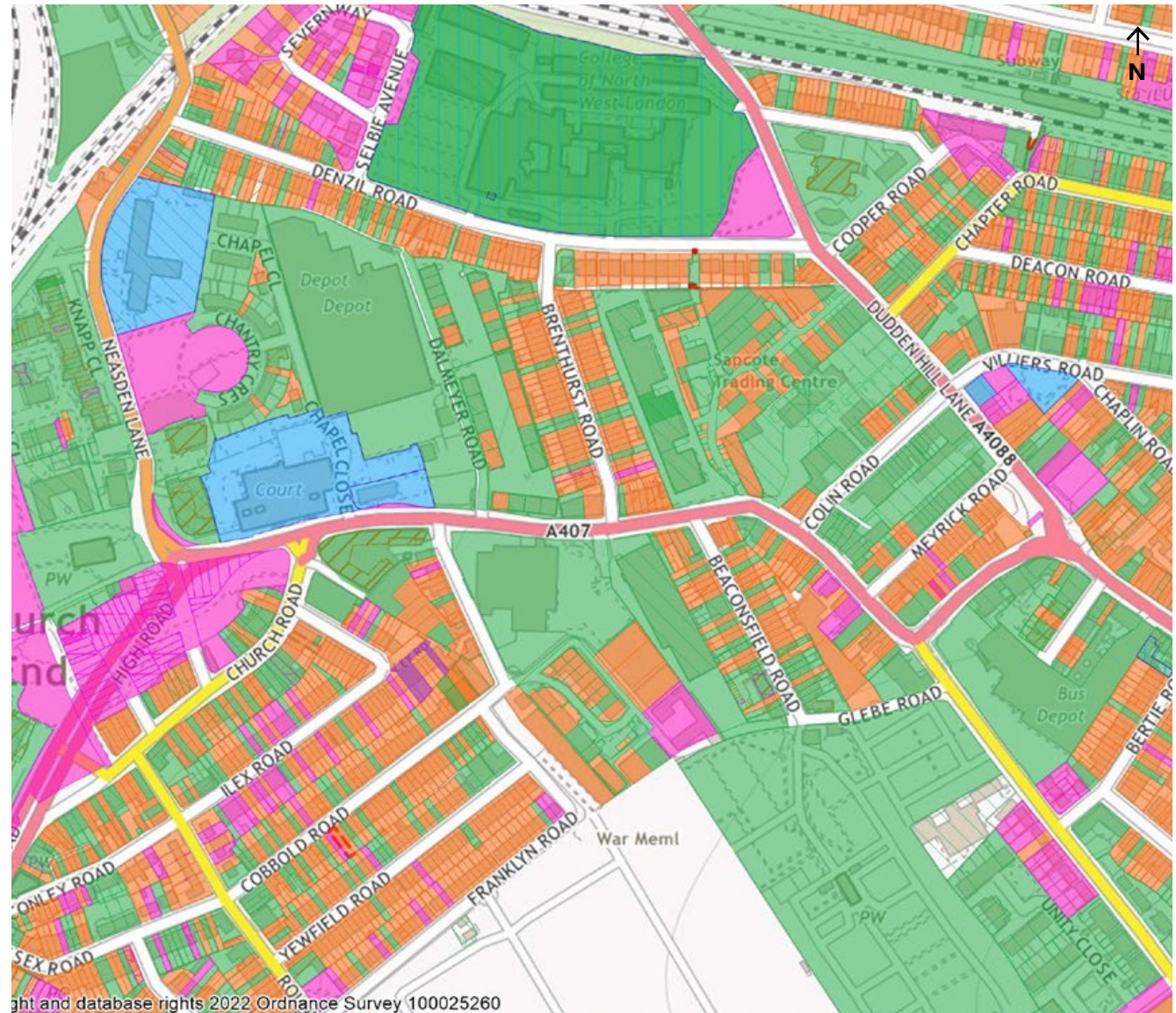


Figure 89 – Church End Common Place platform outcomes

7.2 Land Ownership

7.2.1 The total combined area of the CEGA site allocations is approximately 11ha. 53% of this land is owned by seven landowners, only two of which are public bodies. Larger sites within the site allocations that are under single ownership will typically tend towards early redevelopment than sites under multiple ownerships.

7.2.2 Many sites however suffer from fragmented ownership, including Cygnus Business Park, Sapcote Industrial Estate and the Cobbold and Trojan Estates. Fragmented ownership also provides a barrier to redevelopment within the Town Centre. A summary of the phasing and delivery strategy for each site allocation including land ownership, leasing arrangements and risk analysis is included in Appendix F.



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Figure 90 – Land Ownership map

Key

- Brent Freehold
- Public Sector Freehold
- Other: Freehold
- Other: Leasehold
- Unknown Freehold
- Unknown Leasehold
- Unknown

7.3 Land Consolidation Strategy

7.3.1 The masterplan approach to land consolidation, with phasing informed by the following factors:

- **Building on existing appetite and enthusiasm** by planning and promoting sites where landowners have already shown interest in redevelopment.
- **Focus on larger sites in single ownership** including key sites within all the main five site allocations.
- **Prioritising buildings that are derelict or in poor condition** or are underutilised e.g. Neasden Studios and The Crown.
- **Prioritising council-owned sites and land adjacent** to them e.g. Brent Business Park and adjacent sites on Trojan Estate.
- **Identifying where floorspace could be increased** significantly to support redevelopment and to justify the financial resources required to negotiate land consolidation.

Key

- Sites under single private ownership
- Sites under multiple and fragmented ownerships
- Single ownership of public body/local authority
- Highways under local authority ownership

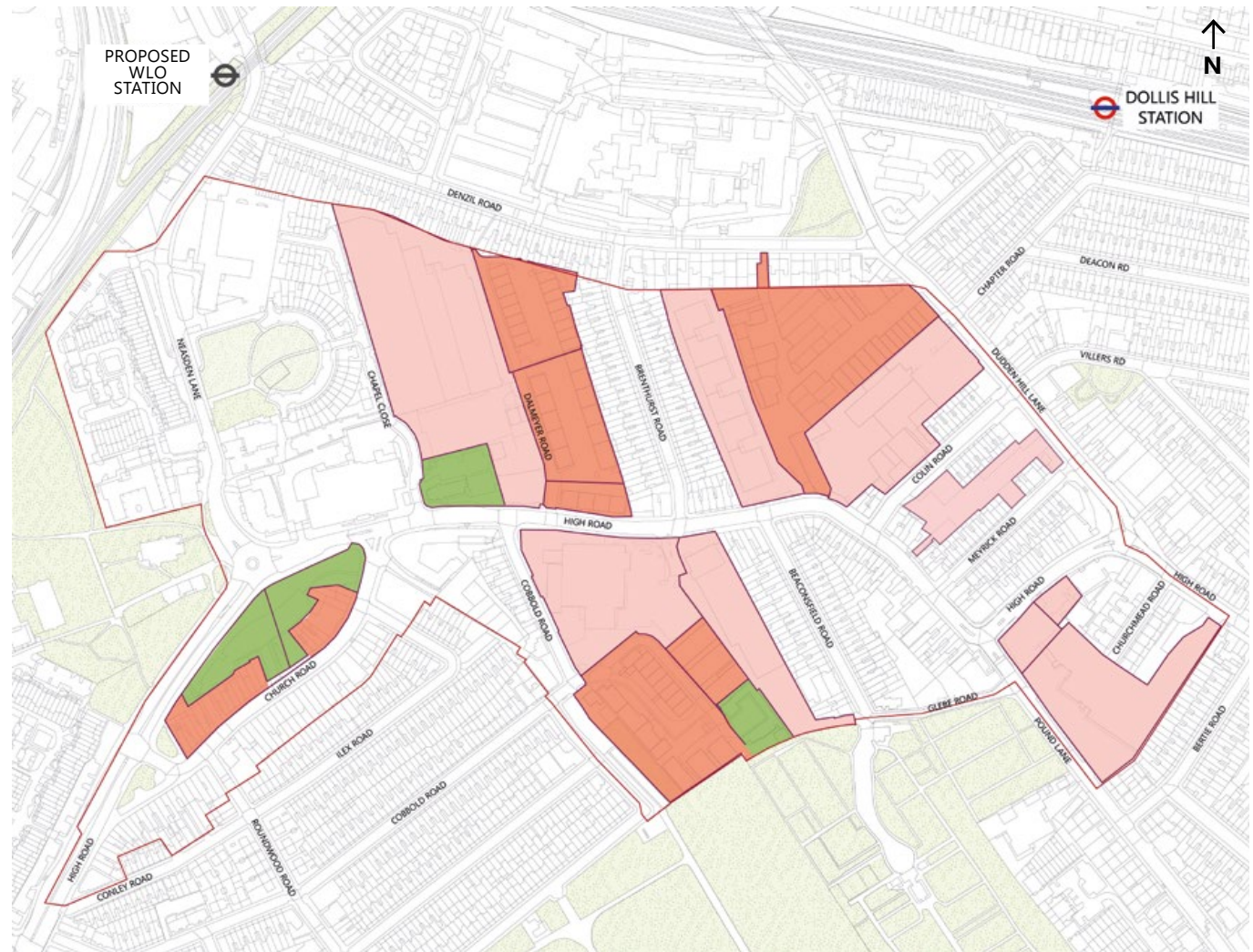
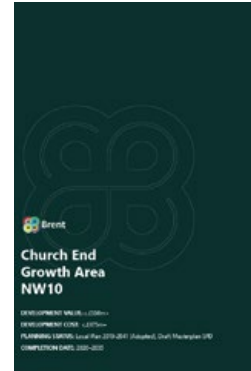


Figure 91 – Site consolidation approach. Adapted from Hawkins\Brown Masterplan Report

7.3 Land Consolidation Strategy

7.3.2 The Council will use a variety of methods to incentivise delivery with the CEGA, reflecting the particular circumstances of the sites:



Design guide and framework for extensions:

This provides greater clarity and guidance on what is appropriate development within Church End Town Centre, identifying different opportunities available on the north and south side of Church Road.

Partnerships with developers and/or housing associations:

The Council has a track record in delivering affordable housing. It also has a history of partnering with other organisations, such as housing associations, or developers where appropriate.

Promotion and engagement with landowners:

Early conversations between the Council and key landowners were initiated as part of the masterplan and that process will continue through statutory consultation and post adoption of the masterplan SPD.

Investment in key infrastructure projects:

Schemes identified in the Council's Infrastructure Delivery Plan (IDP), this CEGA Masterplan SPD or other programmes, to better facilitate the redevelopment of key site allocations.

Compulsory Purchase Order (CPO):

A mechanism of **last** resort, CPO will only be used where necessary to deliver Council supported regeneration and development otherwise being undermined by unreasonable demands from site owners.

7.4 Indicative Phasing

Phase 1: 3-5 years

The north of BSSA3 Church End Local Centre is Council-owned, has planning permission and is due to come forward for delivery. In addition, industrial land

within BSSA4 Chapman's and Industrial Estate, and 28-31 High Road, have been subject to detailed design and planning work and have the potential to come

forward within 3-5 years. Finally, the vacant Crown Public House within BSSA5 Willesden Bus Depot site could come forward as a meanwhile use in the shorter-term.

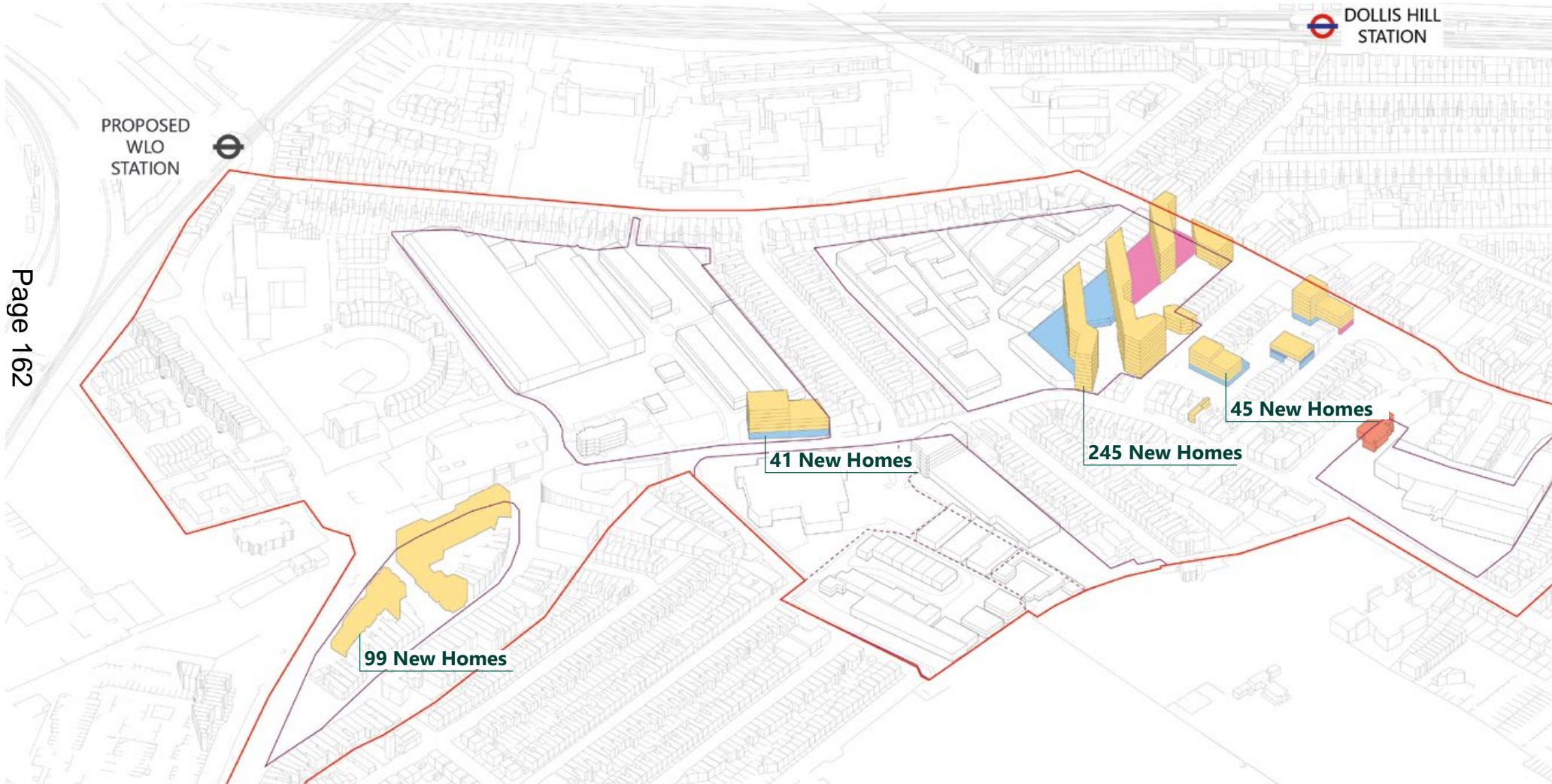


Figure 92 – Phase 1: 3-5 years. Hawkins\Brown Masterplan Report

7.4 Indicative Phasing

Phase 2: 6-11 years

Taking into account landownership and engagement, BSSA1 Asiatic Carpets and parts of BSSA4 Chapman and Sapcote Estate could come forward in 6 to 11 years.

Units within Cygnus Business Estate to the east are retained and enhanced. Within BSSA4 it is envisaged the majority of industrial stock will be retained and enhanced,

but there is potential for redevelopment of the industrial unit facing the High Road. BSSA5 there is also potential for intensification through relocation of the bus depot offices.

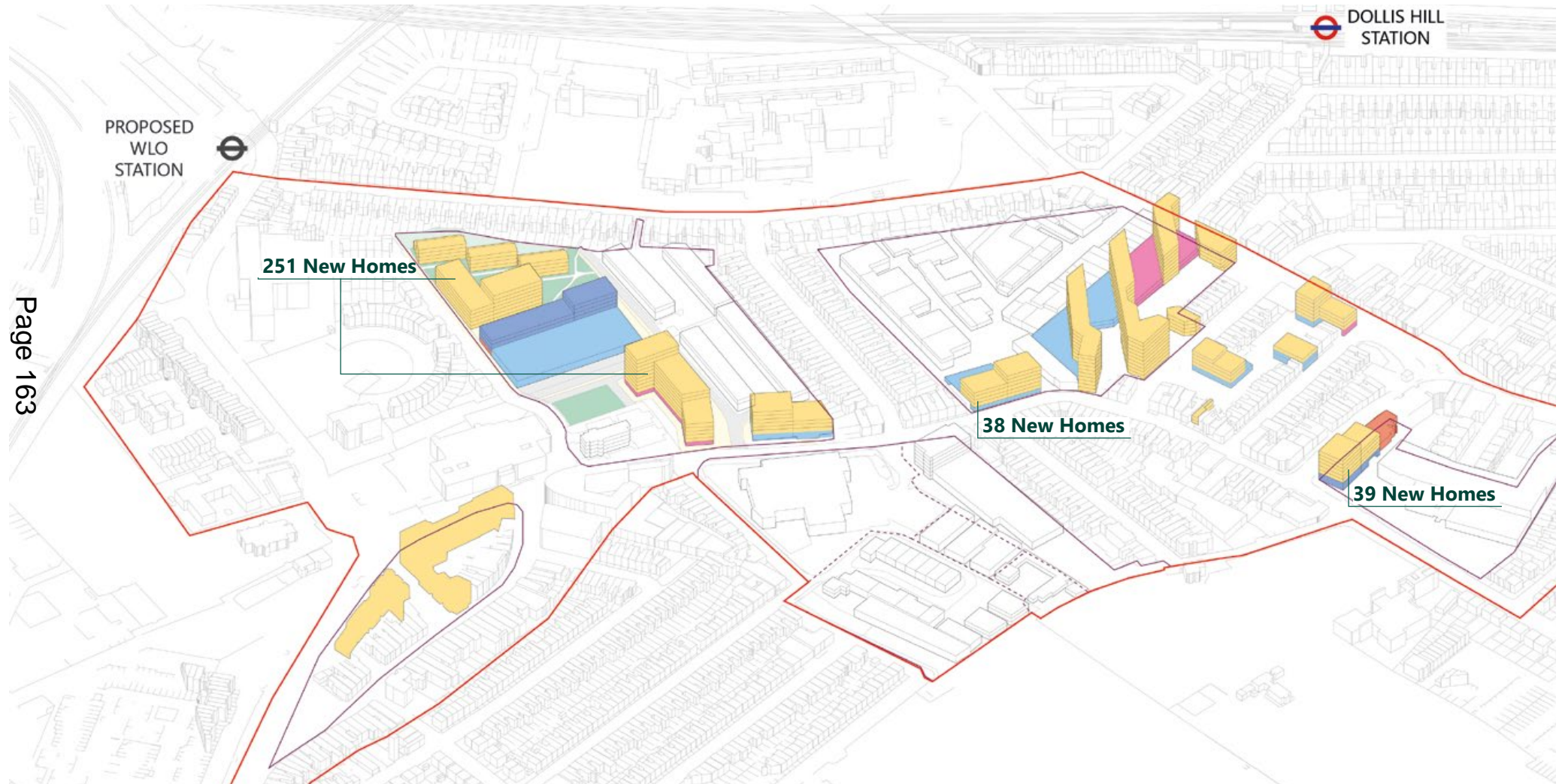


Figure 93 – Phase 2: 6-11 years. Hawkins\Brown Masterplan Report

7.4 Indicative Phasing

Phase 3: 11-15 years

BSSA2 B&M Homes Store are considered more likely to come forward within 11-15 years. Cobbold Industrial Estate is largely fragmented across multiple ownerships

and supports a range of valuable local industrial jobs. MP Moran and Sons is another important local industrial employment site. As such, it is envisaged these sites will

remain in industrial use. Given the fragmented ownership within Church End Local Centre, would come forward site by site through individual site development.

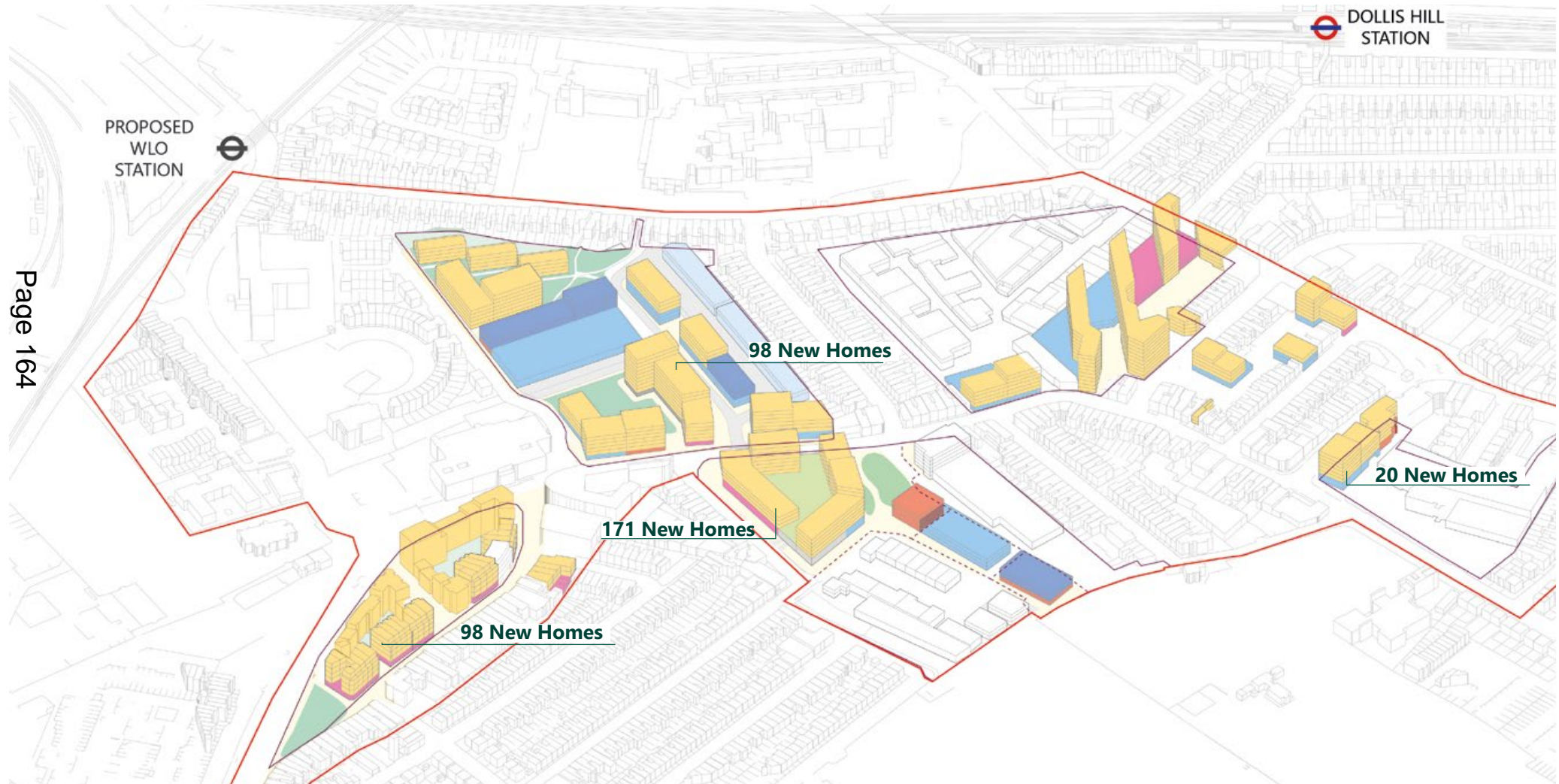


Figure 94 – Phase 3: 11-15 years. Hawkins\Brown Masterplan Report

7.5 Decant and Business Relocation Strategy

7.5.1 Redevelopment proposals within CEGA should include plans to retain businesses in the area and protect local employment. Most businesses are concentrated in Cygnus Business Park and Chapman's and Sapcote Estates. Redevelopment and intensification on these sites should be phased to aim for a comprehensive re-location strategy. Land that is less actively used will be more appropriate for earlier phases and can provide decant capacity to accommodate local businesses and thereby unlocking further redevelopment.

7.5.2 Development impacting industrial sites is to be supported by a Business Relocation Strategy demonstrating

Detailed understanding of existing

businesses on site: This includes their type of activity/use class, potential compatibility with proposed land uses, their market area, number of employees and lease arrangements.

- **Early engagement with businesses:** It is essential to ensure that new spaces are aligned with the needs of existing businesses. Early engagement with businesses should establish if they wish to be retained on site or relocated, and what their requirements are in terms of location, size and type of premises required, fit out and servicing requirements. Where a business wishes

to cease trading, then a signed statement from the business confirming this position should be provided.

- **On-site retention strategy:** Set out how the applicant will work with businesses that wish to be retained to ensure on site provision meets their needs. In some circumstances retrofit or refurbishment of existing facilities may be appropriate. Where this is not feasible, engagement should inform typologies of space and affiliated infrastructure proposed. It should be ensured phasing is aligned to support retention, and ideally enable businesses to relocate only once. Consideration will also need to be given to how service access and yard space can be maintained during construction.
- **Off-site retention strategy:** Set out how the applicant will explore options with businesses who want or need to be relocated and confirmation of what assistance will be provided. This should confirm when relocation will need to occur and identify suitable alternative locations, with the following sequential approach: CEGA or NSGA, Brent, West London, the rest of London and beyond.

7.5.3 The Council will monitor the progress of sites coming forward and decant strategies within both CEGA and NSGA. This will help to co-ordinate the decant process at a strategic level, with the aim of ensuring that businesses have an opportunity to stay and grow in the area.

7.5 Decant and Business Relocation Strategy

Key

- Businesses remain as they are and improvements to the site with potential for accommodating decanted businesses
 - 1 - Sapcote Industrial Estate
 - 2 - MP Moran & Sons
 - 3 - Trojan and Cobbold Estates (partial)
 - 4 - Cygnus Business Park (partial)
 - 5 - Chapman Park Industrial Estate (partial)
 - 6 - Willesden Bus Depot
- Full site redevelopment with re-provision of existing business and potential for new businesses
 - 7 - Neasden Studios/Film Production studio
 - 8 - Probation Centre
- Re-location of businesses within CEGA or nearby industrial areas (NSGA/OPDC)
 - 9 - Cygnus Business Park (partial)
 - 10 - Chapman Park Industrial Estate (partial)
 - 11 - Trojan Industrial Estate (partial)
 - 12 - Brent Enterprise Park
 - 13 - Dudden Hill Site
 - 14 - McGovern's Yard
- Redevelopment of yard or unused space
 - 15 - Asiatic Carpets yard
 - 16 - Willesden Bus Depot yard
 - 17 - The Crown pub
- Town Centre individual site redevelopment with careful consideration of ground floor commercial unit's activities
 - 18 - Local Centre ground-floor units



Figure 95 – Business Relocation Strategy. Adapted from Hawkins\Brown Masterplan Report

*There is a high level of vacancy within the town centre that should be activated. However, as the redevelopment of residential uses on a site-by-site basis will have an inherent impact on the ground floor commercial units, these changes need to be timed carefully to not impact business operations and with a view to re-housing occupiers where possible. However, it is worth noting that any redevelopment may incur rent increases, which in turn would exclude some existing businesses who depend on the current low rents.

8.0 Planning Process

- 8.1 Pre-Application Discussions
- 8.2 Planning Applications
- 8.3 CIL/S106 Planning Obligations
- 8.4 Contacts
- 8.5 Acknowledgements

8.1 Pre-Application Discussions

- 8.1.1 The Council encourages early engagement to discuss proposals for development. It is recognised that to address particular site specific issues that developers might want or need to depart from some of its content. In these cases early engagement with the Council and communities and a clear narrative on why solutions are being proposed will be helpful. It is likely to reduce potentially abortive work and enable clarity from the Council on likely acceptable development schemes.
- 8.1.2 It is recommended that applicants consider the viability of a site at the pre-application stage. This will allow any issues around policy compliance to be resolved before the submission of a planning application.
- 8.1.3 Depending on the scale of the proposal, a planning performance agreement setting out the roles, responsibilities and a timeline for the pre-application, and application, process, may be applicable.
- 8.1.4 Meetings with councillors, and a pre-application presentation to the Planning Committee, may be applicable. Early engagement with the Council's Quality Review Panel (QRP) is highly recommended.

8.2 Planning Applications

- 8.2.1 A list of information to be submitted to ensure a valid application can be found at the Council's website.
- 8.2.2 The Council's Statement for Community Involvement (SCI) sets out the consultation methods that are strongly encouraged before submission of a planning application, in addition to items referenced on 7.5.1.
- 8.2.3 The Council will consult nearby occupiers and relevant stakeholders – in addition to statutory consultees, and responses will inform the Council's assessment of the proposals.
- 8.2.4 The Council's scheme of delegation – setting out what applications will be determined by the Planning Committee – is set out in the constitution.
- 8.2.5 The Council seeks to support schemes which will help to deliver on the Council's objectives as set out in the Local Plan and this document, and will enter into any negotiations positively with a view to securing an outcome that works for all parties.

8.3 CIL/S106 Planning Obligations

- 8.3.1 The mechanism to deliver wider infrastructure associated with CEGA will predominantly be through financial contributions received via the Community Infrastructure Levy (CIL). Where infrastructure relates to a site specific mitigation measure, its provision may be via a planning obligation, or conditions attached to the planning permission.
- 8.3.2 More details on CIL and S106 Planning Obligations can be viewed at the [Council's website](#).

8.4 Contacts

Brent Council Planning and Regeneration Teams

London Borough of Brent

Brent Civic Centre

Engineers Way, Wembley HA9 0FJ

Email: churchend@brent.gov.uk

Website:

<https://www.brent.gov.uk/your-community/regeneration/church-end/>

Other Supplementary Planning Documents can be found at the Council's website below:

<https://www.brent.gov.uk/services-for-residents/planning-and-building-control/planning-policy/supplementary-planning-documents-and-guidance/>

8.5 Acknowledgements

The masterplanning exercise that informed the Masterplan SPD was undertaken by Hawkins\Brown Architects, with contributions from: Jan Kattein Architects; PJA Transport Planning; Ramidus and Propernomics, Vizible 3d consultants. BNP Paribas tested the masterplan's viability and deliverability.

Drawings and graphics were edited/adapted by Brent Council Regeneration Team.

Appendices

Appendix A – Church Road BSSA3 Residential Design Guide

Appendix B – Delivery Summary

Appendix C – Case Studies

Appendix D – Consultation Statement

Appendix E – Social Demographics Data

Appendix F – Locally Significant Industrial Sites (LSIS)

Appendix G – Additional Guidance

Church Road BSSA3 Residential Design Guide



Appendix B – Delivery Summary

BSSA1

Development site	Phase (yrs) 3 / 5/ 10/ 15	Housing delivery	Employment floorspace	Additional conditions	Viability status	Agent of Change considerations	Ownership and land assembly	Business decant and relocation	Delivery route	Project partners	Community involvement	Risks/Considerations
28-31 High Road	5 years	41	1,234 m ² industrial	Retain service yard	Viable	Impact on neighbouring residential uses by re-provided industrial – noise, servicing, nuisance creating activity	4 x Freehold Collective planning application from multiple landowners. This excludes ones of the landowners and may hinder future development of site.	4 existing businesses x Light industrial in low-spec stacked spaces, with yard access and attached office space above (to be re-provided) Owner-occupied businesses intend to return to operate from site	Collective planning application from multiple landowners. Council incentive may be needed to include additional adjacent landowner.	n/a	n/a	- risk of lack of consensus between landowners - impact on operations for Cygnus Business park and main service access - new residential uses could conflict with adjacent service yard and industrial businesses
Asiatic Carpets	10 years	251	3,080 m ² light industrial 2,784 m ² affordable workspace 2,880 m ² commercial workspace	New hub for creative industries and media production, with affordable workspace and 928 m ² community space	Viable	Impact on neighbouring residential uses by re-provided industrial uses – noise, servicing, nuisance creating activity, night-time servicing, conflict with pedestrians and cyclists along proposed north-south cut-through	1 x Freehold with interest to redevelop site	2 existing businesses x Carpet warehouse and film production studio in large volume, low-spec warehouse space. Both need service yard, loading space and access, with film studio needing considerable parking Consideration for temporary re-location or pause in operations of Neasden Studios and new permanent storage facilities for carpet warehouse	Single landowner and developer bringing forward site. Current proposals assume inclusion of Cygnus Business Park and Probation Centre, which have not yet been engaged.	Workspace operators, community organisations, creative industries, existing businesses GLA, housing associations (for affordable/ social rent)	Potential for collaborative design for community space, workspace and new public spaces. Where possible, community uses and public spaces should champion community ownership. Engagement with adjacent land parcels	- no policy requirement for re-provision of industrial or commercial floorspace - temporary closure or relocation of film studio could lead to permanent loss
Cygnus Business Park	15 years	35	4,126 m ² retained industrial 5,550 m ² light industrial	Retain service yard and maintain operations for eastern units. Mix of new and existing light industrial, creative workspace and studio space	Viable	Impact on neighbouring residential uses by re-provided industrial uses – noise, servicing, nuisance creating activity, night-time servicing, conflict with pedestrians and cyclists along proposed north-south cut-through	35 x Freehold and Leasehold Multiple and fragmented ownerships, likely to need incentivising for redevelopment and additional council supports for collective strategy	30+ existing businesses x Mix of light industrial and multiple sectors in small, low-spec units. All units make use of yard and need loading and parking space. Relocation of existing units in available sites in CEGA and NSGA, or the temporary relocation of business to be rehoused in future development on impacted sites.	Collective planning applications from multiple landowners or council-led acquisition Private developer led site assembly	Existing businesses GLA, housing associations (for affordable/social rent)	n/a	- engagement with owners and occupiers on eastern edge of site where no development is proposed – they will need to be equal stakeholders in development process
Probation Centre	15 years	63	968 m ² re-provided floorspace for Probation Centre	450m ² of community space to support Probation Centre and affiliated organisations	Viable	Impact on neighbouring residential uses by re-provided industrial uses – noise, servicing, nuisance creating activity, night-time servicing, conflict with pedestrians and cyclists along proposed north-south cut-through	1 x Freehold by public body no immediate plans of redevelopment. May need council incentive and additional support through NCIL/ community supports	1 existing occupier x Needs to be in proximity of Magistrate's Court and continue operations (temporarily) near to existing site Temporary re-location of Probation Centre, potential within site allocation in vacant or meanwhile space	Potential partnership between council and public body.	Probation Centre, affiliated organisations, community organisations, GLA	Potential for collaborative design for community space	- risk of lack of incentive for development till building condition deteriorates or no longer fit for purpose

Appendix B – Delivery Summary

BSSA2

Development site	Phase (yrs) 3 / 5/ 10/ 15	Housing delivery	Employment floorspace	Additional conditions	Viability status	Agent of Change considerations	Ownership and land assembly	Business decant and relocation	Delivery route	Project partners	Community involvement	Risks/Considerations
B&M Bargains	15 years	171	3,036 m ² workshop/light industrial 1,855 m ² for new Community Health Hub	Podium car parking on remaining ground floor. Small scale retail/cafe use to plug into Health Hub.	Viable	The site fronts working industrial sites and therefore needs to be considerate of active vehicular entrance for MP Moran and Sons to east, as well as service vehicles using Cobbold Road to access industrial estates to the south	1x Freehold Owned by HSBC pension fund and locked into current lease for the medium-long term. However, there is potential to unlock site for residential development after 15 years. This is also when a potential health hub may be required, dependent on Brent ICC recommendation. Parcelling with adjacent sites (below) required for coordinated development with new industrial and community uses, and minimising ongoing impact on adjacent sites.	1 existing business x Locally Significant Industrial Sites (LSIS) – London Plan Policy E7 supports the intensification of industrial uses.	Potential partnership with council owned assets and other adjacent development sites. This may need support and co-ordination from the council to ensure a cohesive development.	Community organisations, GLA, Housing Associations, Brent ICC	Potential for collaborative design for Health Hub, with potential outpost for community enterprise in retail unit. Potential for collaborative design elements on public space and garden.	- single landowner uninterested in developing the site - Development of site on it's own (not in combination with Trojan Estate and Brent Enterprise Park) may restrict development on those more secluded sites
Trojan Estate (partial)	15 years	0	3,780 m ² industrial kitchens	Service yard and 24/7 access needed	Viable	Impact of new industrial uses, mainly noise, odours and service traffic, needs to be carefully managed if using same access as MP Moran and Sons. Consideration of proximity to residential uses proposed at B&M Bargains site.	Est. 3 x Freehold Acquisition by the council or by B&M Bargains landowners may better facilitate integration with adjacent development sites.	3 existing businesses x Light industrial in medium sized warehouse spaces, consisting of wholesale distribution and catering. They all need yard space for loading and car parking, the catering business will need appropriate ventilation. Relocation of existing catering and distribution businesses, preferably within Cobbold Estate.	Potential partnership between council, landowners at B&M Bargains Private developer led site assembly	Workspace operators, existing catering businesses, GLA, local skills and training services	Potential for new light industrial uses to plug into local skills and training provision, building on catering as a growth sector for local employment	- risk of lack of consensus between landowners - risk of one (or more) of the landowners unwilling to redevelop - risk of council intervention antagonising adjacent owners and occupiers
Brent Enterprise Centre	15 years	0	1,800 m ² light industrial/workspace 900 m ² community space	Service yard and external use for community space	Viable	Impact of new community uses, mainly noise and potential for anti-social behaviour need to be carefully managed. Servicing may use same access as MP Moran and Sons or Cobbold Estate and overlap needs to be mitigated for community use.	1x Freehold Council-owned site provides opportunity for exemplar project reflecting local needs and use	Approx. 15 existing businesses x Light industrial in small, low-spec warehouse spaces. Use of shared car park and service yard. Relocation of existing units in available sites in CEGA and NSGA	Council-led development, but could benefit from partnering/ parcelling with adjacent developments at B&M Bargains and Trojan Estate	Existing businesses GLA, housing associations (for affordable/social rent)	n/a	- Careful engagement with owners and occupiers on eastern edge of site where no development is proposed – they will need to be equal stakeholders in development process - potential for council-led development to catalyse change, but site is far removed from main road and doesn't have a strong street presence – so although the site can be developed easily, it will be restricted by surrounding structures

Appendix B – Delivery Summary

BSSA3

Development site	Phase (yrs) 3 / 5/ 10/ 15	Housing delivery	Employment floorspace	Additional conditions	Viability status	Agent of Change considerations	Ownership and land assembly	Business decant and relocation	Delivery route	Project partners	Community involvement	Risks/ Considerations
Town Centre (vacant units)	3-10 years	n/a	1,200 m ² new affordable workspace 6,230 m ² retained retail, food and beverage 840 m ² new community space	Meanwhile activation of vacant unites accompanied by public realm improvements to Church Road and town centre frontages	n/a	Introduction of new community uses may create noise and other potential conflicts with existing upper floor uses. Access and servicing for both new and existing uses may be in conflict with public realm improvements and wider aspirations for removal of general traffic from town centre.	Unknown no. of freeholds and leaseholds Multiple and fragmented ownerships	Unknown no. of businesses (post pandemic) No business relocations proposed	Council-led approach for meanwhile activations and public realm improvements to catalyse further regeneration	Community organisations, existing businesses, workspace operators, GLA, TfL, skills and training providers, London Borough of Culture	Potential for all meanwhile activations to be designed, delivered and managed by the community with support from council. Public realm improvements will require engagement and a temporary changes may allow testing of proposals.	n/a
Town Centre (housing delivery) Page 174	15 years	94	2,257 m ² - 3,410m ² high street uses (including retail, food and beverage, community, faith and workspace)	n/a	Not viable	Introduction of new residential uses along existing high street uses may be impacted by existing issues of noise, traffic, servicing and anti-social behaviour	Unknown no. of freeholds and leaseholds Option 1: Multiple and fragmented ownerships incentivised to intensify site-by-site, supported by a Design Code Option 2: Council acquisition of land in order to deliver housing targets	Unknown no. of businesses (post Covid) Temporary re-location of existing businesses or works that allow for phasing that allows ground floor units to move once along Church Road	Site-by-site redevelopment of individual ownerships OR council-led development in partnership with housing association	Existing residents, existing businesses, community organisations, housing associations (Catalyst)	New housing and supporting design codes could be developed with the community, supporting residents to design and deliver extensions at a low cost. Potential for skills and training	- retaining cluster of businesses through redevelopment where high street will be a construction site. Both options provide a challenging situation: Opt 1 may mean that piecemeal construction impacts the public realm and street continuously for the long term (if development is sufficiently incentivised). Opt 2. would entire clear one side of the high street, impacting multiple businesses and risking a permanent loss

Appendix B – Delivery Summary

BSSA4

Development site	Phase (yrs) 3 / 5/ 10/ 15	Housing delivery	Employment floorspace	Additional conditions	Viability status	Agent of Change considerations	Ownership and land assembly	Business decant and relocation	Delivery route	Project partners	Community involvement	Risks/Considerations
Dudden Hill Site	3 years	245	1,871 m ² workshop/light industrial 1,868 m ² light industrial 1,583 m ² gym 57 m ² retail	n/a	Viable	The site introduces a large number of residential units along Sapcote Estate, which is an actively used industrial estate with yard activity. It is often noisy in the day and proposed Dudden Hill Site development may anticipate redevelopment of adjacent industrial sites, which is not proposed by the masterplan.	1x Freehold Multiple ownerships assembled under developer R55	Approx. 4 existing businesses x Unknown specification, with access to a large service yard and along strategic road network Re-location of existing businesses required, preferably within CEGA or NSGA, along strategic road network and with sufficient yard space.	Developer-led	Affordable workspace providers, housing associations, skills and training providers	Potential for collaborative design for workspace and community-facing uses	- Replacement of industrial uses with creative workspace may set a precedent for replacement of 'low value' uses in the area
Chapman's Estate	15 years	38	1,419 m ² industrial	Service yard and access needed, with continued access and operations for remaining sites within estate	Viable	New residential uses potentially impacted by existing industrial uses, including noise, servicing and potential nuisance-generating activity	1x Freehold and 4x Leaseholds Open to partial redevelopment, however industrial frontage should be maintained on High Road	Approx. 4 existing businesses x Mixed wholesale retail in medium scale low-spec warehouses with dedicated service yards and car parking for customers Relocation of 1 existing occupier in medium-scale industrial unit	Potential partnership between landowner, council and/or housing association	Existing businesses, housing associations	n/a	- Risk of impact on servicing and access of adjacent units

Appendix B – Delivery Summary

BSSA5

Development site	Phase (yrs) 3 / 5/ 10/ 15	Housing delivery	Employment floorspace	Additional conditions	Viability status	Agent of Change considerations	Ownership and land assembly	Business decant and relocation	Delivery route	Project partners	Community involvement	Risks/Considerations
The Crown	10 years	20	480 m ² community space	Meanwhile activation of The Crown building with community and public house uses, followed by residential development with community/public house use on ground floor	Viable	Re-introduction of pub use next to relatively new residential developments (after pub has been disused for many years) may provide a challenge. Need to consider noise, servicing, odours and other nuisance-generating activities or anti-social behaviour	1x Freehold	Vacant	Potential for council-acquisition and initiation of meanwhile use. Potential for partnership with developer or housing association for delivery of residential in med-long term	Community organisations, housing associations, GLA	Potential for all meanwhile activations to be designed, delivered and managed by the community with support from council. Community ownership/ management models could provide continuity beyond meanwhile use.	n/a
Willesden Bus Depot	15 years	39	5,943 m ² bus depot 588 m ² offices	Retention of use and operations of bus depot function. Potential to relocate office block to edge of site, to clear more space for vehicles and provide opportunity for introducing residential on upper floors	Viable	New residential uses potentially impacted by existing bus depot uses – including noise, odours, night-time servicing and traffic	1x Freehold landowners open to partial redevelopment	No relocation of businesses proposed	Potential partnership between landowner, council and/or housing association	Metroline, TfL, GLA, housing associations	n/a	- future of bus depot on current site is unknown and could present a development opportunity in the future - any localise redevelopment of part of the site should make sure that it doesn't constrain future redevelopment of wider site

BSSA8

Development site	Phase (yrs) 3 / 5/ 10/ 15	Housing delivery	Employment floorspace	Additional conditions	Viability status	Agent of Change considerations	Ownership and land assembly	Business decant and relocation	Delivery route	Project partners	Community involvement	Risks/Considerations
McGovern's Yard	10 years	45	1,265 m ² light industrial 338 m ² workspace 250 m ² retail	n/a	Viable	Site is tightly constrained between terraced housing, which the re-provision of alternative industrial uses could impact	Unknown ownership	Approx. 3 existing businesses x Unknown specification, with access to a large service yard and along strategic road network Relocation of existing industrial businesses or provision of temporary facilities prior to rehousing on site	Potential partnership between landowner, council and/or housing association	Existing businesses, community organisations, housing associations, GLA	n/a	n/a

Appendix C – Case Studies



Case Study : LLDC, London

The London Legacy Development Corporation commissioned several studies analysing the options to protect existing employment, including the LLDC Employment Space Study and the HWFI Design & Planning Guidance ruling to:

- Retain existing area for jobs
- Loss of B2/B8 uses not allowed
- Retain existing ecology of uses
- Safeguard SIL land
- Activate yards and frontages.

As planning authority the LLDC tries to make sure that land use change, including housing, should add to, rather than displace. Residential will have to demonstrate that industrial capacity is not compromised by maintaining or increasing its employment density. Housing developments finance the high cost of intensification.



Case Study : Blackhorse Road, London

In 2013 the Upper Lee Valley Opportunity Area Planning Framework removed the SIL designation of the area north of Blackhorse Road Station and set a target of a minimum of 2,550 new homes.

The adopted Urban Design Framework suggested a mixed use area which kept industrial uses in the neighbourhood. Private developers, however, were not willing to deliver the proposed mix of uses so that this approach was finally dropped in the adopted AAP. This caused a substantial loss of employment space.

The Urban Design Framework relied on private developers to deliver the industrial uses.

Industrial use could not compete with the value of residential developments.

STATEMENT OF CONSULTATION

Church End Growth Area (CEGA)
Masterplan Supplementary Planning Document (SPD)
May 2023
This document sets out the public consultation that took place for the draft Church End Growth Area Masterplan SPD, summarises the representations received and the Council's response.

Appendix E – Social Demographics Data

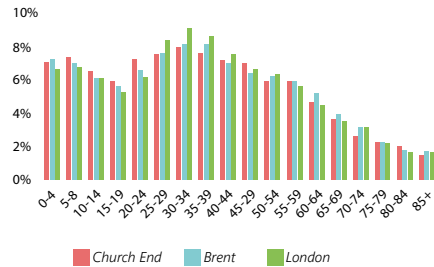
Population count



4,447 people
1,553 households

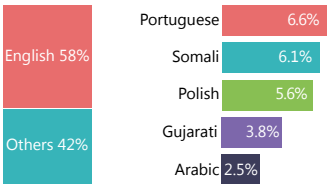
Source: ONS, Estimate for 2020

Population by age



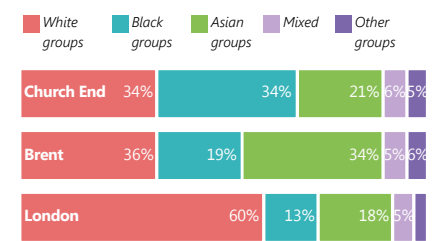
Source: ONS (Small area population estimates) – 2020 estimates

Languages



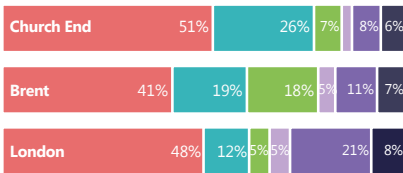
Source: ONS, 2011 Census (Table QS204). Persons aged 3 and over

Population by ethnic group



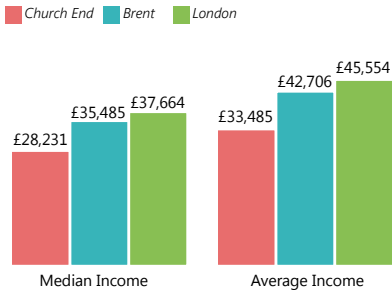
Source: ONS, Estimate for 2020

Population by religion



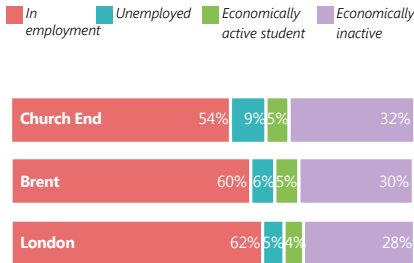
Source: CACI Ltd, estimate for 2021

Household income



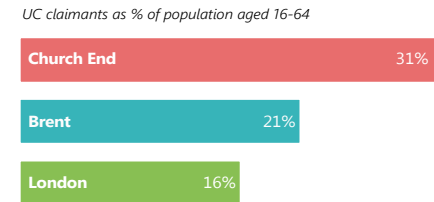
Source: ONS, Estimate for 2020

Economic activity aged 16-74



Source: CACI Ltd, estimate for 2021

Universal Credit claimants



Source: ONS, 2011 Census (Table QS204). Persons aged 3 and over

Appendix F – Locally Significant Industrial Sites (LSIS)

BSSA1 Asiatic Carpets

Site Allocation	Use class	Existing (GIA)	Proposed (GEA)	Proposed (GIA)	Difference to existing (GIA)
28-31 High Road (LSIS)	E(g)(i) – Office	931 m ²	0 m ²	0 m ²	-931m ²
	E(g)(ii)(iii) – Industrial	0 m ²	843 m ²	801 m ²	+801m ²
	B2/B8	0 m ²	0 m ²	0 m ²	0 m ²
	Unknown	303 m ²	0 m ²	0 m ²	-303m ²
	Sub-total	1,234 m ²	843 m ²	801 m ²	-433 m ²
Cygnus Business Centre (LSIS)	E(g)(ii)(iii) – Industrial	1,965 m ²	5,550 m ²	5,273 m ²	+3,308m ²
	B2/B8	3,231 m ²	2,073 m ²	1,969 m ²	-1,262m ²
	Sui Generis	325 m ²	0 m ²	0 m ²	-325m ²
	Unknown	987 m ²	0 m ²	0 m ²	-987m ²
	Sub-total	6,509 m ²	7,623 m ²	7,242 m ²	+733 m ²
TOTAL	BSSA1 LSIS	23,715 m²	18,592 m²	17,673 m²	+300 m²

BSSA4 Chapman and Sapcote Estate

Site Allocation	Use class	Existing (GIA)	Proposed (GEA)	Proposed (GIA)	Difference to existing (GIA)
Chapman Park Industrial Estate (LSIS)	E(g)(ii)(iii) – Industrial	0 m ²	1,419 m ²	1,348 m ²	+1,348 m ²
	B2/B8	2,898 m ²	3,968 m ²	3,770 m ²	+872 m ²
	Sui Generis	1,864 m ²	0 m ²	0 m ²	-1,864 m ²
	Sub-total	4,762 m ²	5,387 m ²	5,118 m ²	+356 m ²
Sapcote Trading Centre (LSIS)	E(g)(ii)(iii) – Industrial	1,296 m ²	1,296 m ²	1,296 m ²	0 m ²
	B2/B8	9,595 m ²	9,595 m ²	9,595 m ²	0 m ²
	Unknown	1,956 m ²	1,956 m ²	1,956 m ²	0 m ²
	Sub-total	12,847 m ²	12,847 m ²	12,847 m ²	0 m ²
Dudden Hill Site (Colin Road) (LSIS)	E(g)(ii)(iii) – Industrial	0 m ²	1,868 m ²	1,868 m ²	+1,868 m ²
	E(a) – Retail/ F&B	0 m ²	1,928 m ²	1,928 m ²	+1,928 m ²
	F – Gym	0 m ²	1,583 m ²	1,583 m ²	+1,583 m ²
	B2/B8	4,450 m ²	0 m ²	0 m ²	-4,450 m ²
	Sub-total	4,450 m ²	5,379 m ²	5,379 m ²	+929 m ²
TOTAL	BSSA4 LSIS	22,059 m²	23,613 m²	23,343 m²	+1,285 m²

BSSA2 B&M Bargains and Cobbold Industrial Estate

Site Allocation	Use class	Existing (GIA)	Proposed (GEA)	Proposed (GIA)	Difference to existing (GIA)
BM Bargains (LSIS)	E(g)(ii)(iii) – Industrial	0 m ²	3,036 m ²	2,884 m ²	+2,884m ²
	E(a) – Retail/ F&B	3,699 m ²	170 m ²	162 m ²	-3,537m ²
	B2/B8	0 m ²	0 m ²	0 m ²	0m ²
	Sub-total	3,699 m ²	3,206 m ²	3,046 m ²	-653 m ²
Trojan Estate (partial) (LSIS)	E(g)(ii)(iii) – Industrial	0 m ²	3,780 m ²	3,591 m ²	3,591m ²
	B2/B8	1,695 m ²	0 m ²	0 m ²	-1,695m ²
	Sui Generis	17 m ²	0 m ²	0 m ²	-17m ²
	Unknown	0 m ²	0 m ²	0 m ²	0 m ²
	Sub-total	1,712 m ²	3,780 m ²	3,591 m ²	+1,879 m ²
Brent Enterprise Park (LSIS)	E(g)(i) Office	692 m ²	1,800 m ²	1,710 m ²	+1,018m ²
	B2/B8	0 m ²	0 m ²	-	0m ²
	Sub-total	692 m ²	1,800 m ²	1,710 m ²	+1,018 m ²
Cobbold and Trojan Estate (LSIS)	E(g)(ii)(iii) – Industrial	0 m ²	0 m ²	0 m ²	0 m ²
	B2/B8	5,656 m ²	5,656 m ²	5,656 m ²	0 m ²
	Sub-total	5,656 m ²	5,656 m ²	5,656 m ²	0 m ²
MP Moran and Sons (LSIS)	E(g)(ii)(iii) – Industrial	0 m ²	0 m ²	0 m ²	0 m ²
	B2/B8	2,725 m ²	2,725 m ²	2,725 m ²	0 m ²
	Sub-total	2,725 m ²	2,725 m ²	2,725 m ²	0 m ²
TOTAL	BSSA2 LSIS	14,483 m²	17,166 m²	16,727 m²	+2,244 m²

Appendix G – Additional Guidance

Land Use

- [Brent Borough Plan \(2022\)](#)
- [Brent Adopted Local Plan \(2022\)](#)
- [Brent Meanwhile Use Strategy \(2021\)](#)
- [Brent Affordable Workspace Strategy \(2020\)](#)
- [Brent Poverty Commission Report \(2020\)](#)
- [Brent Black Community Action Plan \(2020\)](#)
- [Brent Inclusive Growth Strategy \(2019-2040\)](#)
- [Brent Infrastructure Delivery Plan \(2019\)](#)

Page 181. [West London Employment Land Evidence \(2019\)](#)

[Brent Indoor Sports & Leisure Facilities Needs Assessment \(2018\)](#)

• [Brent Strategic Housing Market Assessment \(2018\)](#)

• [GLA Industrial Intensification and Co-location Study \(2018\)](#)

Movement and Connectivity

- [Brent Long Term Transport Strategy \(2015-2035\) \(2021 Review\)](#)
- [TfL Mayor's Transport Strategy \(2018\)](#)
- [TfL Vision Zero Action Plan \(2018\)](#)

Green and Open Spaces

- [Brent Health and Wellbeing Strategy \(2022-2027\)](#)
- [Brent Food Growing and Allotment Strategy \(2012\)](#)
- [Brent Open Space, Sports and Recreation Study \(2019\)](#)
- [Brent Council Indoor Sports and Leisure Facilities Needs Assessment \(2018\)](#)
- [The London Food Strategy \(2018\)](#)
- [GLA Shaping Neighbourhoods: Play and Informal Recreation SPG \(2012\)](#)
- [GLA Urban Greening Factor LPG \(2021\)](#)
- [Sport England's Design Guidance](#)
- [Natural England Biodiversity Metric, Small Sites Metric \(SSM\) and Environmental Benefits from Nature Tool \(EBNT\)](#)
- [Fields In Trust Guidance for Outdoor Sport and Play \(2020\)](#)

Building and Architecture

- [Brent Design Guide SPD1 \(2018\)](#)
- [Brent Tall Buildings Strategy \(2019\)](#)
- [Characterisation and Growth Strategy LP \(2022\)](#)
- [Optimising Site Capacity: A Design Led Approach LPG and Housing LPG \(2022\)](#)

Climate Change and Sustainability

- [Brent Climate & Ecological Emergency Strategy \(2021-2030\)](#)
- [West London Strategic Flood Risk Assessment](#)
- [West London Waste Plan \(2015\)](#)
- [GLA Air Quality Positive LPG \(2022\) \(draft\)](#)
- [GLA Air Quality Neutral LPG \(2022\)](#)
- [GLA Be Seen energy monitoring LPG \(2021\)](#)
- [GLA Circular Economy statements LPG \(2021\)](#)
- [GLA Using Green Infrastructure to protect people from Air Pollution \(2019\)](#)
- [GLA London Environment Strategy \(2018\)](#)
- [GLA London Sustainable Drainage Action Plan \(2016\)](#)
- [GLA The Control of Dust and Emissions During Construction and Demolition SPG \(2014\)](#)
- [Transport for London SUDS in London: A Guide \(2016\)](#)
- [Urban Design for London Designing Rain Gardens: A Practical Guide \(2018\)](#)
- [Homes England Building for a Healthy Life \(2020\)](#)
- [The SUDS Manual \(2015\)](#)

STATEMENT OF CONSULTATION

Church End Growth Area (CEGA)

Masterplan Supplementary Planning Document (SPD)

May 2023

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

Introduction

Church End Growth Area (CEGA) is a priority growth area in the Brent Local Plan. Regeneration in CEGA aims to provide at least 1,300 new homes, employment and supporting infrastructure, including green space, transport, community facilities, and an enhanced public realm. This vision will be achieved through the co-location of industrial and residential uses. Through a 'master planning approach', the CEGA Masterplan Supplementary Planning Document (SPD) has been prepared to guide the comprehensive development of the area.

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

Initial engagement activities took place via online platforms because of coronavirus lockdown restrictions in place at the time. As lockdown restrictions were eased, face to face engagement events took place and have informed the development of the Masterplan SPD.

Activities that have informed this process included:

1. Interviews with people living and working in Church End and community groups
2. An online platform for gathering feedback about the area: [Join the Local Conversation – Church End Regeneration – Commonplace](#)
3. The development of a documentary produced by local young people: [Regeneration Gap - YouTube](#)
4. Interactive workshops with people living and working in Church End, businesses and affordable workspace providers, and community groups
5. Targeted engagement with landowners
6. Businesses survey
7. Activity with Leopold Primary School
8. A targeted session with Brent Mencap Politics and Disabilities Group
9. Two outdoor engagement activities in different parts of the Masterplan process, and
10. Four face-to-face events part of the statutory consultation process.

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

A summary of the events and how they have informed the SPD can be found at the back of this document.

About the Statutory Consultation

The CEGA Masterplan SPD was subject to 7 weeks of formal consultation from 22 September 2022 to 10 November 2022. This was in accordance with the Regulations and the Council's Statement of Community Consultation (SCI). This Consultation Statement sets out the comments received, the Council's response and where appropriate consequential changes made to the SPD. In accordance with the SCI, during the consultation period, the following process was adhered to:

- The draft Masterplan SPD, details of the project and how to get involved were showcased on a dedicated website: <https://haveyoursay.brent.gov.uk/en-GB/projects/church-end-masterplan-supplementary-planning-document/4>
- 1500 promotional flyers were distributed to residents and businesses within the CEGA boundary. Individual flyers were also handed out during the four consultation events.
- The consultation was publicised via social media channels- Facebook, Twitter and LinkedIn.
- Copies of the draft Masterplan SPD were available to view at Wembley, Willesden, Ealing Road and Kingsbury libraries (Harlesden was closed under-going refurbishment), alongside copies of the feedback form.
- Stakeholders and groups on the Local Planning Authority consultation database were emailed, notified of the consultation and consultation events, and invited to comment and attend the consultation events.
- Dedicated consultation updates sent to all local ward councillors to promote the consultation and events
- Four drop-in sessions were organised in different times and locations within CEGA area as shown below:
 - Event 1: Saturday, 8th October 2022, 12pm - 6pm, Church End Street Festival, Church Road, NW10 2TS
 - Event 2: Wednesday, 12th October 2022, 10am - 4pm, Church End Outdoor Market, Church Rd, NW10 9EP
 - Event 3: Friday, 21st October 2022, 12pm - 6pm, St Mary's Church, Neasden Lane, NW10 2TS
 - Event 4: Monday, 31st October 2022, 10am - 4pm, Brent Mencap, 379-381 High Rd, NW10 2JR

Reach

Information about the CEGA consultation has reached over 16,000 people via the Council's social media. There were 1802 hits to the dedicated CEGA website. 627 people in total, including residents, statutory consultees, and other stakeholders attended the four consultation events. 192 people have engaged in dedicated one-to-one discussions with officers about the plans. 97 people completed the surveys available in our events and online via our consultation portal. 19 people/organisations issued formal consultation responses.



Figure 1 - Photos of the face-to-face events.

Overview feedback

In total, 116 people have provided comments on the draft Masterplan SPD during the 7-week consultation period. The majority were supportive. Below some of the supportive quotes:

'The masterplan SPD identifies all deficiencies and has correct priorities. If even half of the plan is delivered in 10-15 years, it will be a major improvement to the area.'

'I am broadly supportive of the regeneration plan, which is long overdue. There needs to be parallel investment in crime prevention, public safety, and civic pride.'

'So glad this is happening, I hope it doesn't lead to massive gentrification.' 'Very happy green spaces will be created.'

'Supportive as long as it is environmentally sustainable',

However, consultation responses asked for further consideration on the following topics:

- **Housing:** there should be more affordable housing, and this should be available for local residents in need of more suitable accommodation, and for key workers in health, education and the emergency services.
- **Green Spaces vs Building Heights:** more green space should be provided in appropriate locations to support the increase in housing.
- **Infrastructure and Parking:** questions were raised in relation to health and educational infrastructure to support the increase in housing. Comments also related to parking pressures, provision for Electric Vehicle (EV) charging, and parking for elderly and disabled people as well as for the religious institutions based in the locality.

- Cleaning and Fly-tipping: comments related more to the existing situation in Church End that were not directly relevant to the Masterplan SPD. Respondents ask for more investment in initiatives to tackle these issues order to improve the local sense of pride and by consequence, community cohesion.
- Safety and anti-social behaviour: Additional concerns were raised problems in the area and that the Council should be more active in addressing these issues.
- Cycling: better infrastructure should be provided, with minimum specifications seen as key to promoting safe active travel.
- Young people: more facilities and activities for them should be provided.
- Entertainment: local provision should be included.
- Supermarket: new provision required.
- Heritage: regeneration should value and preserve local heritage, including consideration of whether existing buildings need to be demolished in order to provide new facilities.
- Play: more activities for children and play spaces that are fully accessible and inclusive for the community, should be provided.
- High Street offer: requests for measures to ensure a more diverse local offer that support community needs.
- Workspaces: Spaces for crafts and arts which reflect the diverse cultural ethnicity of the area are also welcomed to support community cohesion.

Formal Representations

The table below demonstrates the percentage of people that supported the proposed plans when attending the events or filling the feedback forms and the more limited that disagreed:

	Supportive of the Vision Values and Objectives	Agree with Challenges	Agree with Opportunities	Have no concerns regarding Site Allocations
Agree	70%	61%	54%	43%
Disagree	8%	11%	4%	7%

*The remaining percentages didn't agree or disagree with the plans but provided comments which have helped to inform our response and updates within the document.

A summary of the representations received throughout the 7 weeks consultation period is outlined within the following pages:

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
E01-1	London Square Developments Limited (LSQ)	6.0 Site Allocations	The site allocation indicative housing target outlined in the Masterplan SPD is 300 homes. LSQ has engaged in a series of pre-application meetings with LBB and the Greater London Authority (GLA) since February 2022 in relation to the proposed redevelopment of the Site, which forms part of the wider site allocation BSSA4. As part of this process, the pre-application proposals have been presented to the QRP in April 2022 and a subsequent Chair's review in June 2022. LSQ states that the pre-application and QRP meetings have been positive regarding the design and the proposed number of units (circa 300 units) for their portion of the site only. The pre-application scheme has been developed with the support from Daylight and Sunlight, Transport, Sustainability, Ecology, Microclimate, Air quality and Noise consultants to ensure it is technically sound.	The site allocation capacity reflects the developable land at this site. All sites have been assessed to understand their development potential and capacity. The remainder of this site is under very fragmented land ownership and feedback from businesses indicate that they are performing well, and therefore have not been considered for redevelopment.	<p><u>Text added</u> Section 4.2 The Masterplan:</p> <p><u>4.2.3 The capacity indicated in the Site Allocation is an 'indicative target'. As it is 'indicative', providing an application which delivers a greater number of dwellings is robustly justified, and compliant with the wider development plan and the aspirations of this SPD, then it could be considered acceptable at application stage.</u></p>
		6.4 BSSA4: Chapman's and Sapcote Estate			
E01-2	London Square Developments Limited (LSQ)	Number of Residential Units	Section 7.4 of the draft SPD sets out the indicative phasing for development across three phases: Phase 1 (3 -5 years); Phase 2 (6 – 11 years); and Phase 3 (6 – 11 years). The draft SPD states that within Phase 1 industrial land within the site allocation BSSA4 has been subject to detailed design and planning work and has the potential to come forward within 3 – 5 years.	The capacity indicated in the Site Allocation is an 'indicative target'. As it is 'indicative', providing an application which delivers a greater number of dwellings is robustly justified, and compliant with the wider development plan and the aspirations of this SPD, then it could be considered acceptable at application stage. The predicted capacity is considered to reflect the Council's masterplan evidence base, and on-going conversations through pre-applications.	Further text will be included to provide clarification on the point raised.
		6.0 Site Allocations			
E01-2	London Square Developments Limited (LSQ)	6.4 BSSA4: Chapman's and Sapcote Estate	SPD Figure 84 sets out a diagram of Phase 1 which is included in Figure 1. The Figure shows the 370 High Road and 54 – 68 Dudden Hill Lane site as providing 245 new homes as part of Phase 1.	The Masterplan SPD is a planning guidance document and cannot overrule already adopted policies and estimated housing targets as it is set out in Brent's Adopted Local Plan .	No change.
		Phasing			
E01-2	London Square Developments Limited (LSQ)		LSQ has engaged in detailed pre-application discussions with LBB in relation to the proposed development at 370 High Road and 54 – 68 Dudden Hill Lane. This development incorporates approximately 300 residential units. Phase 1 should therefore be amended	The capacity indicated in the Site Allocation is an 'indicative target'. As it is 'indicative', providing an application which delivers a greater number of dwellings is robustly justified, and compliant with the wider development plan and the aspirations of this SPD, then it could be considered acceptable at application stage.	

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			to this, to reflect the positive pre-application discussions.		
E01-3	London Square Developments Limited (LSQ)	6.0 Site Allocations 6.4 BSSA4: Chapman's and Sapcote Estate Land Use	<p>SPD Figure 13 outlines the proposed ground floor land uses across the SPD area. In relation to the Site, this includes light industrial (Class E(g)(iii)) and retail, F&B and services (Class E(a)/(b)/(c) and sui generis). This follows the previous application for the redevelopment of the Site (ref. 18/3498), which was withdrawn in January 2021 and included ground floor retail use. The pre-application scheme similarly includes retail floorspace at ground floor level which is required to facilitate the wider development.</p> <p>However, SPD Figure 70, which sets out indicative massing for the Site, only includes residential (Use Class C3) and commercial offices, workspace and professional services (Use Class E (c)/(g)).</p> <p>On the basis that retail floorspace is required to facilitate the redevelopment of the Site, and for consistency with SPD Figure 13, it is suggested that Figure 70 should be amended to include retail use at ground floor and the wording of that the Strategic Objective of Section 6.4 should be amended.</p>	The team acknowledges the differences pointed out on Figures 12 and 79 (updated numbers).	<p>Figure 79 to be updated to include retail use at ground floor, as indicated on Figure 12.</p> <p><u>Text added</u> on Section 6.4, Strategic Objective to match details indicated on figure 12:</p> <p>Residential development and workspace will be directed towards Colin Road and the High Road. <u>Retail floorspace will be directed towards Dudden Hill Lane.</u> The industrial function of Sapcote Trading Centre and Chapman's Park Industrial estate will be protected and intensified.</p>

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
E01-4	London Square Developments Limited (LSQ)	6.0 Site Allocations 6.4 BSSA4: Chapman's and Sapcote Estate Building Heights	<p>The indicative building heights of 1 – 10 storeys are based on the Withdrawn Application which is no longer coming forward. LSQ has developed an alternative design in consultation with LBB that incorporates a height, scale, massing and built footprint that varies from the withdrawn scheme.</p> <p>The design led process has resulted in the proposed heights of buildings varying between 3 storeys (ground with two upper storeys) and 14 storeys (ground with 13 upper storeys).</p> <p>Given that the pre-application scheme has been developed through a detailed design led process and has been tested to demonstrate that it responds positively to the surrounding context, it is suggested that the indicative heights set out throughout the SPD should be updated to reflect the pre-application scheme.</p>	<p>London Plan policy D9 requires boroughs to define what a tall building is, identifying appropriate locations for them, and designating them in their local plans. Tall buildings outside of these areas will not be allowed. Accordingly, Policy BD2 of the Brent Local Plan identifies tall buildings as being those which are more than 30 metres in height. The Local Plan policies map identifies Tall Building Zones where tall buildings will be considered appropriate.</p> <p>The site BSSA4 sits <u>outside</u> of a Tall Building Zone. This is because the area is not considered to have the characteristics that would warrant its identification as a Tall Buildings Zone as per Brent's Tall Building Strategy. The SPD, as a guidance document only, cannot create new policy.</p>	No change.
E01-5	London Square Developments Limited (LSQ)	General Withdraw application	It is suggested that that reference to the Withdrawn Application, which will not come forward, should be removed.	<p>The only direct reference to the withdrawn application is on page 61, Existing Framework. The proposal is used to indicate and illustrate potential redevelopment of the site.</p> <p>On Section 6.4 the name Willesden Workshop is used on page 82, Community Spaces and on page 102 purely to indicate the portion of the site discussed. However, it is recognized that the name 'Willesden Workshop' no longer relates to the site, so references to it will be removed.</p>	<p><u>Text</u> on Section 6.4, Policy Requirements, Community Spaces, to be <u>updated</u>:</p> <p>New workspace to be delivered within <u>new development on the site should aim to provide a business support function</u> Willesden Workshop site is to provide a business support function and deliver community benefits.</p> <p>Appendix B BSSA4 to be updated: Willesden Workshop <u>Dudden Hill Site</u></p>
E01-6	London Square Developments Limited (LSQ)	6.0 Site Allocations 6.4 BSSA4: Chapman's and Sapcote Estate Erick Road	It is suggested to correct the reference to Erick Road as it has no co-relation with the site and replace it to Colin Road which runs adjacent to the site.	The team acknowledges the discrepancy noted.	<p><u>Text removed and updated</u> Section 6.4 Building Heights:</p> <p>Buildings heights to vary between 1-10 storeys. Development will need to address the close proximity to the</p>

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
					residential homes at Erick Road <u>Colin Road</u> , minimising impact of massing.
E02-1	Collins Coward Planning and Development Consultancy on behalf of NDB and MNM owners of the units 29-31 Cygnus Business Park, Dalmeyer Road, NW10 2XA	General	<p>Residual unit at no 28 has never been a feature of the discussions to which the consultee shall refer and this component of the building is shown outside of the red line on the enclosed. It is submitted that there is little prospect of this position changing.</p> <p>The two owners have been jointly pursuing a development scheme(s) for many years with various previous applications for prior approval and redevelopment before the local planning authority. A summary of the planning history has been included as part of the representation.</p> <p>This history is important as it shows a clear commitment to develop the site and confirm that this will be one of the first sites to come forward as a pump primer to begin to deliver the aspirations of the masterplan.</p> <p>It is also stated that a redevelopment of the scheme has been agreed within the context of pre application discussions, in respect of height and design. Developers welcome the Church End revival and are clearly engaging in the process.</p>	We welcome the commitment and the efforts that have been made to redevelop the site. We re-enforce that pre-application discussions provide feedback and guidance on the scheme and do not configure a formal approval.	No change.
E02-2	Collins Coward Planning and Development Consultancy on behalf of NDB and MNM owners of the units 29-31 Cygnus Business Park, Dalmeyer Road, NW10 2XA	5.0 Urban Design Framework 5.4 Building Design and Architecture Housing Typology / Existing Framework	At 5.4 the site is notated as being a block of flats over 3 storeys, but this is not the case: the use is still offices.	The team acknowledges the need for updating Figure 53.	Change the current hatch from Figure 53, removing residential reference and showing 29-31 Cygnus Business Park as office use.
E02-3	Collins Coward Planning and Development Consultancy	7.0 Delivery Approach and Phasing 7.4 Indicative Phasing	The site is likely to be the first to come forward with a scheme and if there is a viable scheme this will be taken through planning in 2023 and developed thereafter.	Figure 92 (revised number) acknowledges that the site discussed is likely to be the first one on BSSA1 to be delivered, with the site being part of Phase 1 with delivery expected to take place between 3-5yrs.	No change.

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
	on behalf of NDB and MNM owners of the units 29-31 Cygnus Business Park, Dalmeyer Road, NW10 2XA				
E02-4	Collins Coward Planning and Development Consultancy on behalf of NDB and MNM owners of the units 29-31 Cygnus Business Park, Dalmeyer Road, NW10 2XA	Building Heights	The current pre application scheme is 9 storeys at its highest and this is not consistent with the 7-storey indication in the MP albeit we do accept that this is only a broad-based indication.	Building heights outlined are guidance to ensure the scheme integrates well with the surrounding urban framework. Providing an application which delivers a greater number of dwellings is robustly justified, and compliant with the wider development plan and the aspirations of this SPD, then it could be considered acceptable at application stage.	No change.
E02-5	Collins Coward Planning and Development Consultancy on behalf of NDB and MNM owners of the units 29-31 Cygnus Business Park, Dalmeyer Road, NW10 2XA	Deliverability	<p>Conflicting planning requirements are suggesting that the site cannot come forward: with the height limitation; the need to retain the industrial floor space, to include affordable workspace; provide 25% family accommodation as well as affordable housing.</p> <p>The MP should reflect the realities of the economic situation and by this we are not simply referring to the more immediate concerns which we are dominating 2022 and which we hope are short lived. The viability and practicality points have a long pedigree and if the site is to be developed with a decent architecturally designed scheme and so contribute to the regeneration objective these viability points need to be taken in mind.</p> <p>It is also hoped and anticipated that the regeneration team will assist in facilitating this through the planning proves within this viable and practical context. A list of unrealistic/competing requirements is not going to yield a scheme and a practical view should be taken and this should be a key comment of the MP as it is only by such</p>	Noted. There are always potential tensions balancing planning policy requirements. Individual schemes will be evaluated on their own merit and how they bring about and achieve the comprehensive redevelopment of the area when they come forward for planning. The extent to which proposals meet policy requirements will be weighed as part of the planning balance. Policy provides sufficient flexibility in instances where it is not possible to meet all policy requirements simultaneously for viability reasons, providing it is robustly demonstrated such would render redevelopment of an otherwise acceptable scheme undeliverable.	No change.

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			an approach that the regeneration imperatives will be delivered.		
E03-1	National Highways Limited	General	National Highways encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour. It welcomes working with local planning authorities and developers to support the preparation of sound documents which enable the delivery of sustainable development.	We welcome the support to develop and collaborate to deliver the masterplan objectives.	No change.
E03-2	National Highways Limited	5.0 Urban Design Framework 5.2 Movement and Connectivity TM1 Transport Impacts	<p>Any proposed development capable of presenting an impact on the network should be accompanied by a robust transport assessment or similar. National Highways will consider the impact of a development proposal on the network at the time of application submission but also welcome early involvement in discussions as development proposals emerge.</p> <p>National Highways highlights Paragraphs 9 and 10 of the Circular which refers to development proposals being unacceptable, by virtue of a severe impact, if they increase demand for use of a section of the network that is already operating over-capacity or cannot be safely accommodated within the existing infrastructure provision, unless suitable mitigation is agreed. In such a circumstance, mitigation would be requested. Should any impact on the SRN be identified, National Highways will seek to use Grampian conditions to limit development prior to SRN improvement schemes being in place or any mitigation measures identified phased in relation to the CEGA sites coming forward. National Highways also highlights London Plan Policy T4 that requires London boroughs to assess impacts on all transport modes including the wider strategic highway network.</p>	<p>We recognise the importance of engaging with National Highways at early development stages.</p> <p>We are also aware of London Plan Policy T4 that requires London boroughs to assess impacts on all transport modes including the wider strategic highway network. This policy also requires application which generate significant movement, in accordance with the NPPF, to submit a Transport Assessment. These are to be produced in accordance with TfL guidance, and focus on their Healthy Streets Approach. This is with an aim of reducing reliance of vehicles, and increasing the uptake of sustainable transport modes. This is reflected in the masterplan development principle TM1 which requires Travel Plans and Transport Assessments to be submitted, and TM2 which requires development to be car free/lite. A similar approach has been taken for the Neasden Stations Growth Area SPD which has had a transport assessment undertaken to assess the impact on the strategic road network (including M1). This took into account other development including in CEGA. It identified no significant impacts. Given the lower level of development proposed in CEGA it is therefore unlikely that development will have a significant impact upon the strategic transport network.</p>	No change.

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
E03-3	National Highways Limited	5.0 Urban Design Framework 5.2 Movement and Connectivity TM2 Car ownership and parking	<p>Under Section 5.2 of the Masterplan SPD, TM2 highlights car ownership and parking, citing 'Reduce travel by private car through car-free or car-lite development supported by provision for shared mobility including car clubs. Provision must be made for charging electric or Ultra- Low Emission vehicles. (Local Plan policy BT2)'.</p> <p>Any proposed development should prioritise active, efficient, and sustainable transport choices. The CEGA benefits from close proximity to Neasden Station and Dollis Hill Station which are served by the Jubilee line with regular services to the southeast into central London, and to the northwest to Wembley Park.</p> <p>National Highways welcomes measures to reduce private car traffic generation in the first instance and the provision of sustainable transport measures. Whilst we support a sustainable transport strategy, we need to understand whether it is likely these measures will discourage vehicle trips travelling on our network, which are largely strategic journeys in nature. For National Highways, it is measures such as public transport enhancements i.e. bus, underground, rail or improved integration of these services that would realistically affect the number of vehicle trips that would otherwise travel on our network. We do recognise that there will still be a desire for commercial and private vehicle trips using the national strategic highways.</p>	<p>The masterplan outlines a number of traffic and infrastructure improvements to help incentivise people to opt for active travel options. Please see Section 5.2 Proposed Interventions.</p> <p>It focuses on key routes to access public transport stations Neasden and Dollis Hill, as well as junctions that can be dangerous for pedestrians and cyclists. By doing this, we hope to improve public transport take up across the area and create a more welcoming environment for people to move across.</p> <p>All improvements have been added to Brent's Infrastructure Delivery Plan (IDP) and we hope to secure funding from developments coming forward to deliver the improvements highlighted.</p> <p>We ensure that any forthcoming development that may have the potential to impact upon National Highways' network is accompanied by a robust transport assessment or similar, to identify what traffic impacts the development site(s) would have on the network, and mitigation measures put forward to accommodate this.</p> <p>The Council is actively exploring installation of EV charge points across the area. In addition, Brent's EV Infrastructure Plan details expected EVCP demand in the coming years. Ways to meet this demand are being explored.</p>	No change.
E03-4	National Highways Limited	Summary	<p>National Highways has undertaken a review of the draft Church End Growth Area (CEGA) Masterplan Supplementary Planning Document, dated September 2022, which helps identify and maximise the development potential of the CEGA.</p> <p>The Masterplan SPD proposes a high level of development, and it should be ensured that any forthcoming development that may have the potential to impact upon our network is accompanied by a robust</p>	We welcome the support.	No change.

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			<p>transport assessment or similar, to identify what traffic impacts the development site(s) would have on our network, and mitigation measures put forward to accommodate this.</p> <p>We look forward to continuing to participate in future consultations and discussions.</p>		
E04-1	Sport England	5.0 Urban Design Framework 5.3 Green and Open Spaces Sport Facility Impact	<p>The SPD seeks to provide 1,300 homes the occupiers of which will generate demand for sporting provision. The existing sport provision within the area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that the SPD should set out what facilities are required to meet existing sport facility deficits and future demand.</p> <p>Sport England is unclear how the demand for sport provision was established and whether it is based on a robust and sound evidence base.</p> <p>The Council's Playing Pitch Strategy is out of date and Sport England is unaware if the Council has similar strategy for indoor/built sport facilities. As a result, whilst Sport England welcomes that the SPD acknowledges sports facilities would need protecting and new provision might be required, it is concerned that the type, amount or extent of facilities has not been robustly informed by a sound evidence base.</p> <p>This raises questions whether the SPD positively plans for sport and its soundness.</p>	<p>The masterplan SPD was developed based on Brent's Open Space, Sports and Recreation Study (2019), Brent's Indoor Sports and Leisure Facilities Needs Assessment (2018), and the Playing Pitch Needs Assessment (2016). The documents provide a comprehensive appraisal of the existing provision in the Borough as well as its condition, distribution and overall quality. It also considers the demand for provision based on population distribution, planned growth and consultation findings.</p> <p>Whilst the Council acknowledges that these documents were prepared some years ago, the Council does not agree that it is realistic to reproduce extensive and expensive evidence to identify the local need. The documents have been designed to be robust, and resilient to change, taking into account the Councils planned population growth up until 2041, and how this can be met by existing and new social infrastructure provision.</p> <p>We also recommend individual schemes to engage early with the community to understand specific local needs and address them within their detailed design proposal when they come forward for planning.</p>	No change.
E04-2	Sport England	5.0 Urban Design Framework 5.3 Green and Open Spaces	Sport England welcomes that OSF1 requires that fitness and wellbeing needs should be met with paragraph	We welcome Sports England support.	No change.

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
		Development Principles	5.3.11 indicating some sites expected to retain or bring forward sports facilities.		
E04-3	Sport England	5.0 Urban Design Framework 5.3 Green and Open Spaces Development Principles	Sport England support that the SPD, in OSF2, recognises that development should contribute towards the maintenance, improvement and expansion of facilities. Maintenance implications, in particular, are often overlooked so by ensuring that this is considered at the outset is important for the sustainability of a facility.	We welcome Sports England support.	No change.
E04-4	Sport England	5.0 Urban Design Framework 5.3 Green and Open Spaces Active Design	Sport England also welcomes that OSF4 highlights that any facility should be developed to align with Sport England guidance and owners/operators should entering into Community Use Agreements as this would ensure that facilities would be publicly accessible and fit for purpose.	We welcome Sports England support.	No change.
E04-5	Sport England	5.0 Urban Design Framework 5.3 Green and Open Spaces Active Design	<p>Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Sport England, along with Public Health England, have launched Active Design which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has considerable synergy with many elements of the SPD, particularly when considering the health and wellbeing aspirations mentioned within the SPD's vision.</p> <p>There are also references within the SPD to co-location, creating a network of green infrastructure, adopting the 'Healthy Streets' approach and encouraging active travel modes which align with Active Design Principles.</p> <p>Sport England recommend the draft SPD to include clear references to Active Design, its principles and the Active Design Checklist.</p>	The masterplan SPD embraces some of the Active Design principles within its underpinning values and development principles but does not make particular reference to the Active Design checklist. Recommendations will be amended to refer to the Active Design checklist.	<p><u>Text added:</u></p> <p><i>OSF5 Design: <u>Developments must plan for active design. Please refer to the Sport England Active Design checklist.</u></i></p>

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
E04-6	Sport England	5.0 Urban Design Framework 5.3 Green and Open Spaces Employment	<p>Sport makes a huge contribution to the lives of individuals, to the economy and to society. Sport England has undertaken research to examine the economic value of sport in England which placed sport within the top 15 industry sectors in England and higher than sale and repair of motor vehicles, insurance, telecoms services, legal services and accounting (*<i>Economic value of sport in England</i> June 2013 published by Sport England). Sport and sport-related activity was estimated to support over 400,000 full-time equivalent jobs – 2.3% of all jobs in England.</p> <p>It is Sport England's contention that the Council should consider sports uses, such as fitness clubs, gyms, climbing centres and five aside centres, to be acceptable on employment sites within the Growth Area as they do create sustainable employment opportunities and provide work experience and qualifications.</p> <p>Sport England therefore recommends that employment site destinations and the policies that affect them include sport and recreation facilities which could complement the more traditional 'employment uses' or create more employment opportunities.</p>	<p>The employment sites referred to include those designated as Locally Significant Industrial Sites (LSIS), and non-designated Local Employment Sites (LES's).</p> <p>LSIS is protected under Local Plan Policy BE2, in accordance with London Plan policies E4-E7, for industrial intensification. This includes the uses listed under criterion A of E4 as being appropriate. This does not include sports and leisure uses. BE2 requires that industrial land is intensified to a minimum plot ratio of 0.65 or existing, whichever is greater. Providing this is achieved, the delivery of non-industrial uses, where they contribute toward a mixed and balanced community, may be considered acceptable providing it is evidenced.</p> <p>LES's are protected under Local Plan policy BE3, in accordance with London Plan policy E4 for employment uses. Although this is more flexible than LSIS, it does not include sports and leisure facilities.</p> <p>On these sites, it would not be possible for the SPD to advocate for their redevelopment to include sports and leisure facilities where this is not evidenced.</p> <p>Some of the sites include existing retail. These sites do not include the restriction of the LSIS and LES sites. Therefore, the provision of sports and leisure facilities could be considered acceptable.</p> <p>Currently, there is no specific reference in the draft Masterplan SPD to employment opportunities linked to fitness and health. Given the above restrictions, it is considered that the potential for these uses within the masterplan area could be made clear.</p>	<p><u>Text added:</u></p> <p><u>5.3.14 The Council is supportive of sport and recreation facilities to complement employment uses. Sports and leisure uses will therefore be considered acceptable on existing retail sites where their need is evidenced, in addition to designated and non-designated employment land where they contribute toward mixed communities, and development intensifies industrial/employment floorspace in accordance with Local Plan policies.</u></p>

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
E05-1	Resident 1	Capacity of the infrastructure	<p>Concerns that by increasing housing capacity we will be putting strain on the existing public services in the area such as primary schools, rubbish collection/fly tipping, GP surgery, NHS dental surgeries. There doesn't seem to be any clear plan for increasing capacity of these services.</p> <p>This area has a huge and constant problem with fly tipping. I can only see this getting worse as the population increases.</p>	<p>The masterplan SPD establishes a longer-term approach for cohesive and comprehensive redevelopment of sites. It was developed taking into consideration the existing and future population growth as well as its needs and demands. All statutory services and provision related to education, waste collection and health have been considered including the below:</p> <p>Schools: Brent's latest School Place Planning Strategy 2019-2023 (November 2022 refresh) indicates that Brent will continue to have a high number of spare places across the primary system at a borough level. Brent 2022 school planning forecasts also confirm sufficient secondary school places to meet demand up to 2028/29 in all year groups. North Brent Secondary School is under construction in Neasden Lane. Further details on Brent's School Place Planning Strategy.</p> <p>Waste collection: Development principle W3 Storage indicates that new developments need to adhere to a Site Waste Management Plan and Operation Waste Management Plan. (London Plan policy D6 and S17). This ensures that on-site waste is effectively managed. Development Plan policies also require that both construction and household waste is reduced. The West London Waste Plan seeks to ensure the future capacity of waste sites is sufficient to meet future demand given population growth and changing trends. This is an effort to ensure that London is self-sufficient and can meet all of its waste needs in accordance with London Plan policy S18.</p> <p>Health provision: The North West London Integrated Care System (ICS) was consulted as officers developed the draft CEGA Masterplan SPD. The ICS stated by May 2021 that there is no need for an additional health hub/facility within the CEGA boundary. The CEGA Masterplan SPD also designates Site Allocation BSSA2 (B&M Home Store & Cobbold</p>	<p><u>Update references</u> to Clinical Commissioning Group to <u>Integrated Care System</u>, on Sections 6.2 BSSA2 Policy Requirements and Appendix B- BSSA2.</p>

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				Industrial Estate) for redevelopment and provision of a health facility (approximately 1,855m ²) should local needs and demand change, and subject to agreement with the ICS. A review of local health needs with the ICS is expected to take place every 5 years.	
E05-2	Resident 1	Parking	People parking in residential bays without permits and illegal parking are a recurrent issue. Not enough parking wardens at relevant times. Recent new developments have exacerbated parking issues when bays are used as storage for building materials.	<p>The masterplan SPD promotes car-free or car-lite development. Proposals will need to adhere to policy guidance set out in section 5.2- TM2 Car ownership and parking. Developments will need to comply with Brent Local Plan parking standards, as set out in Policy BT2, which seeks to limit the provision of parking as far as is practicable.</p> <p>The SPD also, in accordance with Development Plan policy, seeks to increase the modal share of more sustainable transport modes, including walking, cycling, and public transport. Church End Growth Area is near two (2) underground stations Dollis Hill and Neasden. To stimulate the use of public transport, the masterplan indicates a number of streets, junctions and crossings where improvements need to be made. Safer, well-lit, welcoming and connected routes can support this transition. Improvements in junctions can also help optimise traffic flow and by consequence bus service provision. This will mean fewer people feel the need to own a vehicle, which will result in fewer breaches of parking allowances.</p> <p>To ensure only those with dedicated parking spaces and permits own vehicles, the Council will consult on introducing a Controlled Parking Zone (CPZ) within the surrounding area. Developers will be expected to provide a car parking management plan which demonstrates how they will enforce the use of parking spaces within the area.</p>	No change.

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				It is considered that the masterplan SPD will not result in worsening parking problems within the area.	
E05-3	Resident 1	Crime	Concerns that by increasing the population, common rising issues will increase such as street drinking, drugs, and crime.	<p>Development principles were developed to ensure new spaces are safe, well-lit, overlooked and active. By doing this we plan to create environments that people want to occupy and use, creating a strong and positive sense of community identity.</p> <p>Whilst the SPD seeks to improve the area in terms of safety, crime prevention, fly-tipping and public realm improvements, by setting out principles that will help to better the area, it alone cannot resolve cleanliness and social behavioural issues.</p> <p>London Plan policy D11, in addition to other design-related policies, seeks to design out crime. This includes reference to the Secured by Design scheme published by the police. This includes design measures which reduce the likelihood of crime, such as ensuring passive surveillance and street lighting which help guard against anti-social behaviour.</p> <p>To bring extra consideration to the topics mentioned, further text can be added.</p>	<p><u>Text added:</u></p> <p>OGS3 Safety: Create safe spaces and secure access by designing out crime, and by providing well-lit and overlooked spaces, adjacent uses that provide activation. <u>Development proposals should pay due regard to Secured by Design (SbD) standards.</u> (Local Plan policy BG11)</p>
E05-4	Resident 1	HMOs	Planning permission: of the 3 or 4 houses on Ilex Rd that have recently been bought and sold, all seem to have been split into HMO's. Again, this leads to increased pressure on parking and rubbish collection.	This comment relates to an existing address and is not relevant to the SPD. Any suspected breaches of planning control can be reported to the enforcement team for investigation.	No change.

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
E06-1	Resident 2	Youth places and support	<p>Over the past 30 years there has been very little consideration given to the impact of removing youth provision and youth space in the community. This has had many negative consequences that are evidenced in Chalkhill, Stonebridge and Church End.</p> <p>Church End needs a Youth Centre similar in size to the UNITAS Building in Barnet. In order to improve the life-chances of the current and future youth of NW10, this needs to be the first clear commitment in the development of the masterplan.</p> <p>If young people have a place where they feel safe that is accessible, they will use it. However, such a place first needs to be built and the community needs to know that this is recognized as a priority need by the Master planners.</p>	<p>The masterplan SPD recognises the need to invest in spaces and support for young people.</p> <p>BSSA1 is allocated to deliver a community space linked to the existing arts and film production supporting training and employment for young people.</p> <p>BSSA3 encourages the use of vacant and underused high street units to provide new community space and affordable workspace, with an emphasis on space for young people, art and local enterprise.</p> <p>The engagement developed throughout the masterplan SPD has also helped the Council to secure support and funding to deliver Church End Youth Anchor in a vacant town centre premises, an innovative initiative to support young people that is due to open by the end of 2023.</p>	No change.
E07-1	Transport for London (TfL)	Co-Location	<p>In line with Policy E7, it should be ensured that the proposed development is designed to include appropriate mitigation for the residential element, including but not limited to, ensuring that access, servicing and delivery arrangements of the proposed use seek to minimise conflict.</p> <p>In line with Policy D13 of the London Plan, it must be ensured that proposed new noise-sensitive developments mitigate impacts from existing noise and other nuisance-generating activities to ensure that existing uses can remain viable and continue or grow without unreasonable restrictions being placed on them.</p> <p>As part of the design principles included on Page 54 of the consultation SPD, it has been identified that there will be separate access for different uses and users, consolidating servicing areas and providing dedicated access to allow separate pedestrian and cycle access from the street. For industrial intensification it is noted</p>	<p>Noted. SPD principle TM3 requires development to be informed by delivery and servicing plans, specifically ensuring that the potential conflict between residential and industrial uses is minimised.</p> <p>Section 5.5, Development Principles of the SPD addresses the Agent of Change principle in accordance with London Plan policy D13. This will allow potential bad neighbours to continue effective operation alongside sensitive residential receptors and includes explicit consideration of noise and odour.</p> <p>Additional text will be included to ensure the site can accommodate co-location in a safe manner.</p> <p>Support welcomed.</p>	<p><u>Text added:</u></p> <p>TM3 Logistics: Development should be informed by Delivery and Servicing Plans. These should balance providing adequate access and servicing arrangements for industrial/commercial uses and residents whilst protecting amenity. Technical innovation to consolidate delivery and construction transport is encouraged, including provision for electric vehicles. <u>Consideration should be given to imposing safety standards for delivery and servicing vehicles at the site: minimum of FORS Silver, preferred of FORS Gold for all HGVs).</u> (Local Plan policy BT3)</p>

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			<p>that within the design principles it has been identified that the service yards should incorporate sufficient space for HGVs to turn (where appropriate). This is in line with Policy T7, which states that developments should ensure that they provide adequate space for servicing, storage and deliveries off-street. It should be ensured that vehicles are able to enter and exit the site in a forward gear.</p> <p>Noting that the majority of the additional homes are to be delivered through co-location, in which there will be a mixture of industrial and residential development on the different sites, consideration should be given to imposing certain safety standards for delivery and servicing vehicles at the site (i.e. minimum of FORS Silver, preferred of FORS Gold for all HGVs).</p>		
<div> <div> Page 203 </div> <div> </div> </div>	Transport for London (TfL)	West London Orbital Line	<p>It is noted that the document includes references to the West London Orbital Line (WLO), which is a new public transport scheme to connect the growth areas in west London, as outlined in Proposal 88 of the Mayor's Transport Strategy (MTS). The document needs to be clear that this proposal still needs funding and further development and design, amendments are required to the text and figures to provide better clarity on the WLO.</p> <p>References to 'Proposed Dudding Hill Station' should be amended to 'Proposed WLO station' or 'Proposed Neasden WLO station' to ensure that there is consistency with TfL terminology used for this project and to avoid confusion with the historic Dudding Hill station which was at a different location.</p> <p>It is also considered that Figure 5 of the document can be made clearer, and current inaccuracies addressed.</p> <p>Matters to be addressed as part of an updated Figure 5 can be summarised as:</p>	<p>Clarification can be provided to reinforce WLO is still dependant on funding and further development design.</p> <p>Name of the station also to be updated to ensure consistency with TfL terminology.</p> <p>Figure 5 will also be updated for clarity and precision.</p> <p>The location of the WLO in figure 33 will also be corrected.</p>	<p><u>Text added:</u></p> <p>2.3.1 Both Neasden and Church End Growth Areas could benefit from the West London Orbital (WLO) route proposed in the Mayor's Transport Strategy 2018. The WLO would reactivate the Dudding Hill freight line to the north-west of CEGA for passenger travel. A new Overground station at Neasden Lane would provide interchange with the Jubilee line. It would also connect to Brent Cross and Old Oak Common and increase the area's capacity to support regeneration and growth. Funding and permission for the WLO is to be confirmed. <u>Delivery of the proposed passenger line and stations is still dependant on funding and permissions.</u></p> <p>Name of the station to be updated to: 'Proposed WLO station' in all maps of the masterplan SPD.</p>

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Page 204			<ul style="list-style-type: none"> Lionel Road Station is identified on the map as existing, rather than potential The map has two different colours for 'potential' and 'proposed' in relation to the WLO, which is confusing. 'Existing West London Overground line and station' includes some parts of the LO network but misses others off (e.g. the route south of Willesden Junction to Richmond via South Acton is not shown). Clearly identifying all London Overground infrastructure would help show there would be more good connections from Church End with WLO. The location for the HS2 station is marked a considerable distance west of its actual location. <p>Also, in Figure 33 the proposed WLO station is located in the wrong place: it should be shown immediately west of where the railway crosses Neasden Lane.</p>		<p>Figure 5 to be replaced for the one used on NSGA Masterplan SPD (adopted) sourced from the Mayr's Transport Strategy 2018.</p> <p>Figure 33 to have WLO location corrected.</p>
E07-3	Transport for London (TfL)	Neasden Station	It is noted that in Figure 30 the document makes references to a public realm intervention at Neasden Station. Clarity should be provided on the expectations for the public realm intervention, and whether this is a separate scheme or considered to be part of the station project.	It is agreed further detail can be included to clarify the expectations for the improvements and relation of this to the public realm improvements around the existing station project.	<p>Section 5.2 Movement and Connectivity, Proposed Intervention, <u>Text added:</u></p> <p>1.7 Neasden Station Public Realm (<u>project part of NSGA, design and funding subject to confirmation and approval from TfL</u>)</p>
E07-4	Transport for London (TfL)	Bus Stands	In line with Policy T3 this stand, as well as other bus stands and stops located within the Church End masterplan area, should be protected. Any relocation of stands and stops must be discussed with TfL in advance of any application being submitted, to ensure that any alternative location offered is suitable and adheres to TfL's standards.	It is agreed that further clarification should be provided regarding bus stops.	<p><u>Text added</u> on Section 5.2 Movement and Connectivity, Development Principles:</p> <p><u>Active Sustainable Travel</u> <u>ST5 Bus stops: Any relocation of stands and stops must be discussed with TfL in advance of any application being submitted, to ensure that any alternative</u></p>

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
Page 205 E07-5			We support the commitment to provide continued bus access along Church Road which is mentioned in option 1. We seek an assurance that continued bus access would also be provided under option 2. In either option we would want to have early engagement to discuss any proposed relocation of bus stops. They should be located and designed to optimise access for passengers and ensure safety for passengers and other users of the street space in line with TfL guidance.		<u>location offered is suitable and adheres to TfL's standards.</u> Text added 5.2 Proposed interventions Option 2 – <u>Building upon option 1</u> , recreate the historic alignment of Church Road: The two green spaces would be joined to form a public square whilst businesses at the western end of the high street would retain access to servicing and loading facilities. <u>In this option, London buses would continue to circulate throughout. The section between Ilex Road and Roundwood would continue to have restricted traffic for private vehicles, but movement throughout the two roads would remain as it is.</u>
	Transport for London (TfL)	5.0 Urban Design Framework 5.2 Movement and Connectivity – Proposed Framework	The movement hierarchy is a useful tool, but some caution needs to be applied to the widths, which are provided as minima. The guidance in all cases should be in line with national and London-wide guidance, but at present there is some risk of contradiction with other guidance. It is considered that this information would be better presented as graphic street sections rather than in text only as currently presented in the draft SPD.	Figure 21 provided a high-level summary of road typologies in the masterplan area. Their applicability for the proposed interventions on the Proposed Framework section would be considered in detail at application stage. Any significant interventions which impact upon TfL operations will be subject to consultation with TfL. In all cases this will take into consideration national and regional best practice guidance.	Key priorities will be indicated for each typology as per below.
	Transport for London (TfL)	5.0 Urban Design Framework 5.2 Movement and Connectivity – Proposed Framework	It is also noted that each type has a long list of components that 'should' be provided. It would be helpful to have some prioritisation of these i.e. could these requirements more usefully be divided into 'must' 'should' and 'may'?	Using 'should' allows for greater flexibility given the varying capacity of different areas to accommodate each required intervention. The appropriateness of each intervention will be considered in detail at application stage, where the absence of interventions will be noted and need to be justified.	No change.

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E07-7	Transport for London (TfL)	5.0 Urban Design Framework 5.2 Movement and Connectivity – Proposed Framework	It should also be noted that the preferred minimum lane width for roads which supports bus movement is 3.25 metres.	Comment noted. Text will be added to reflect suggestion.	Text added 5.2 Movement and Connectivity / Street Hierarchy as per below.
E07-8	Transport for London (TfL)	5.0 Urban Design Framework 5.2 Movement and Connectivity – Proposed Framework	Dual Carriageway - This would benefit from a stronger steer towards providing SUDS and planting, which is implied through the choice of image, but not supported in the list of minimum widths. Instead of using the term 'buffer', this could explicitly say 'planted strip' or similar. For a footway on a wide street, it is recommended that a minimum of 2 metres clear width is provided, making it clear that this space is not to be used to accommodate all signage and street furniture. It is recommended that 'cycle paths' is referred to as 'cycle tracks'. In line with LCDS standards, for reasonable cycle flows, these ought to be a minimum of 2.2m if one-way or 3.0m if two-way.	Dual carriageway – The list for this street typology includes rain gardens and SuDS as being required. Agreed that buffer could more explicitly indicate a green buffer, see proposed change.. It is unlikely to be possible in all instances to make this 'clear width', and that pedestrian flows will easily work around any well planned street signage/furniture. It is considered that cycle paths are accepted and well understood terminology and does not require amendment to tracks.	Removed text and proposed changes below: Addition diagrammatic section. <i>Ideal widths:</i> Footway min 2m clear width// Cycle Path min <u>2.2 m</u> if one-way or 3.0m if two-way // Carriageway min. <u>3.5m</u> per lane // <u>Vegetated Buffer</u> min 1m // It should prioritise <i>as a minimum</i> : Street lighting facing both footway and carriageway; Formal wayfinding towards stations, nearby parks and key destinations; Green buffer between carriageways between carriageway and footways; Potential for reduction of carriageway lanes, additional trees, cycle parking, seating & play, rain gardens and Sustainable Urban Drainage (SuDs); Cycle lanes on both sides.
E07-9	Transport for London (TfL)	5.0 Urban Design Framework 5.2 Movement and Connectivity – Proposed Framework	Strategic connector – As above, for a footway on a wide street, it is recommended that a minimum of 2 metres clear width is provided, making it clear that this space is not to be used to accommodate all signage and street furniture. It is recommended that 'cycle paths' is referred to as 'cycle tracks'. In line with LCDS standards, for reasonable cycle flows, these out to be a minimum of 2.2m if one-way or 3.0m if two-way. It has been identified that a strategic connector should have a building-to-building width of 12-15m, which appears to be a little low for a strategic route. For example, it	Strategic connector - Paths are noted as requiring a minimum width of 2m. It is unlikely to be possible in all instances to make this 'clear width', and that pedestrian flows will easily work around any well-planned street signage/furniture. It is considered that cycle paths is an accepted and well understood terminology and does not require amendment to tracks.	Removed text and proposed changes below: Addition diagrammatic section. <i>Ideal widths:</i> Footway min 2m clear width// <i>Should provide: Street lighting facing both footway and carriageway; Junctions and crossings designed to</i>

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			would be challenging to get dedicated cycle infrastructure into a street of 12-13m. It is recommended that the guidance look at more efficient use of carriageway space, which enhanced crossing facilities, rather than widths which are that may not be workable in practice. For example, at Dudden Hill Lane the width taken up by the third lane, refuge islands and hatching could be relocated to provide cycle infrastructure. This guidance, as it currently reads, would not promote this approach.		<i>facilitate safe, convenient active travel; Formal wayfinding towards stations, nearby parks, key destinations and Town Centres; Safe and overlooked cycle parking; Opportunities for greening vertical surfaces.</i>
E07-10	Transport for London (TfL)	5.0 Urban Design Framework 5.2 Movement and Connectivity – Proposed Framework	Local Streets – As above, it is recommended that a minimum of 2 metres clear width is provided, making it clear that this space is not used to accommodate all signage and street furniture. A clear distinction needs to be made between one-way and two-way streets, particularly because the image shown is of a one-way street. 3m would be acceptable for a one-way street but unworkable for two-way. Most if not all of the streets shown as local streets in figure 20 are two-way. It may be more helpful to give a steer on what to do with parking in these streets, i.e. kept to one side, in short stretches of allocated bays, on-footway / at footway level where the footway is at least 5m wide. Reference to ease of crossing for pedestrians would also be helpful	Local streets - Paths are noted as requiring a minimum width of 2m. It is unlikely to be possible in all instances to make this 'clear width', and that pedestrian flows will easily work around any well-planned street signage/furniture. The 3m width is referenced as a minimum and would relate to a single lane road. The detail and feasibility of any proposed amendments to the road network would be worked up in detail at application stage. The typologies were used in reference to figure 21 and how each should be treated. As such, for this purpose, it is considered sufficient. The requirement to improve pedestrian crossings is addressed throughout the document, identifying where crossings should be, and how they should be improved to ensure desire lines can be followed.	Removed text and proposed changes below: Addition diagrammatic section. <u>Ideal widths:</u> Footway min 2m clear width// <u>Should provide: Lighting to prioritise footways; Clear sightlines to landmarks and informal wayfinding; Potential for small-scale community interventions and opportunities for growing; Junctions and crossings designed to facilitate safe, convenient active travel (particularly with strategic connector / dual carriageway).</u>
E07-11	Transport for London (TfL)	5.0 Urban Design Framework 5.2 Movement and Connectivity – Proposed Framework	Industrial/residential – it is unclear what the buffer refers to, and clarity would be beneficial i.e. it is between the cycle track and the carriageway only. Due to the way that they function, it can be argued that Colin Road and Dalmeyer Road do not belong in the same category. Having a residential frontage is a key difference. It does not appear possible to achieve a 7m-wide carriageway on Dalmeyer Road or Chapel Close. Parking is a key factor – to achieve the minimum widths,	Industrial/residential – The buffer is noted as being 'between servicing routes and pedestrian cycle infrastructure' which provides sufficient clarification. Colin Road is not identified as an industrial/residential road, it is assumed you instead mean 'Chapel Close' which is the only other industrial/residential road. The designations are proposed designations as it relates to the proposed future development. As such, the roads will likely be transformed to accommodate the proposed co-location of industrial and residential as appropriate.	Following previous comments, wording will be amended: <u>Ideal widths:</u> Footway min 2m clear width// <u>Should provide: Street lighting facing both footway and carriageway; Clear formal signage for the industrial estates; Clear wayfinding for pedestrians and cycle connections; Green buffer between</u>

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			much if not all of the parking would need to be removed.		<u>servicing routes and pedestrian/cycle infrastructure, trees.</u>
E07-12	Transport for London (TfL)	5.0 Urban Design Framework 5.2 Movement and Connectivity – Proposed Framework	City hub/boulevard - buffer could be wider as a stronger push towards providing greening and street trees, as well as usable threshold space to support ground floor uses. Different cycle track minima should be expressed for one-way (on both sides) and two-way (on one side) scenarios.	City Hub/Boulevard – The buffer is in reference to the required vegetated spacing between the footpath and the cycle paths. This does not include threshold space to support ground floor uses which will be considered in detail at application stage.	Proposed changes below: Addition diagrammatic section. <u>Ideal widths: Footway min 2m clear width// Cycle Path min 2.2 m if one-way or 3.0m if two-way // Carriageway min. 3.5m per lane // Vegetated Buffer min 1-1.5m //</u> <u>Feature street trees as buffer and green landmarks; Street lighting facing both footway and carriageway and potential downlighters for trees; Formal wayfinding towards stations, nearby parks, key destinations and Town Centres; Seating and spill out from adjacent ground floor uses; Safe and overlooked cycle parking.; Junctions and crossings designed to facilitate safe, convenient active travel</u>
E07-13	Transport for London (TfL)	5.0 Urban Design Framework 5.2 Movement and Connectivity – Proposed Framework	City Place – It is recommended that the intent is backed up by text – ‘shared space’ and ‘lanes are not compatible.	Comment noted. Changes will be made to reflect the suggestion provided.	<u>Text updated:</u> <u>Ideal widths: Footway min 2m clear width//Min. 8m. Footway min 2m // Pedestrian priority/shared surface</u> <u>Should provide: Street trees and low level planting; Formal wayfinding; Lighting to prioritise footways; Benches Seating and spill out from adjacent ground floor uses; Safe and overlooked cycle parking.</u>
E07-14	Transport for London (TfL)	AT1 – AT4 Active Travel	We welcome the prioritisation of active travel, adoption of a Healthy Streets Approach, improved wayfinding and better facilities for cycling including cycle parking. Attention should be paid to addressing the barriers to	We welcome the support. The requirement to improve pedestrian crossings and associated severance is addressed throughout the document, identifying where crossings should be, and how they	No change.

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			movement by active travel including severance caused by heavily parked or trafficked routes and issues of personal safety and security.	should be improved to ensure desire lines can be followed. This is in addition to enhancing the public realm and pedestrian environment more generally.	
E07-15	Transport for London (TfL)	TM2 – Car Ownership and Parking	All residential development in areas of PTAL 5 or 6 must be car free to comply with London Plan Policy T6 and car free development should be encouraged elsewhere. Where general car parking is provided it should be minimised consistent with targets for mode share. Encouragement should be provided to the conversion of public, private and on street car parking spaces to other uses. Car clubs are only appropriate where they are substituting for car ownership because car club vehicles contribute to traffic congestion and road danger and take up valuable space i.e. they should only be promoted in locations where car parking is permitted but has been reduced below the maximum.	Development principle TM2, Section 5.2 highlights that <u>developments should be</u> car-free or car-lite development supported by provision for shared mobility including car clubs. Given only a small portion of the growth area achieves a PTAL of 5+, it is considered that this reflects Policy T6 of the London Plan. The majority of the growth area achieves a PTAL of 3+, which the Council would most definitely seek to minimise below the maximums set out in policy T6, in accordance with the aspirations of principle TM2. The Council recognises that car club spaces contribute towards overall parking provision in accordance with paragraph 10.6.15 of the London Plan and should be used as a measure to further reduce parking provision. Reference to green buffers and SUDS to be introduced are made throughout this section which likely will result in some reduction of on street parking provision.	No change.
E07-16	Transport for London (TfL)	TM3 – Logistics	Delivery and Servicing Plans should also aim to reduce the impact on the road network and positive encouragement should be given to use of non-motorised freight transport including cargo bikes.	Development principle TM3, Section 5.2 states that developments should be informed by Delivery and Servicing Plans which should provide balanced access and service arrangements whilst protecting residential amenities. More could be added to encourage use of non-motorised freight transport.	<u>Text added:</u> TM3 Logistics: Development should be informed by Delivery and Service Plans. These should balance providing adequate access and servicing arrangements for industrial/commercial uses and residents, whilst protecting amenity. Technical innovation to consolidate delivery and construction transport is , <u>as well as the use of non-motorised freight transport is supported and</u> encouraged, including the provision for electric vehicles. (Local Plan policy BT3).
E07-17	Transport for London (TfL)	BSSA4 Chapman's and Sapcote Estate	Regarding the withdrawn application, concerns were raised regarding the quantum of car parking. It must be ensured that the parking provision is provided in line	The applicant is no longer going ahead with the previously withdrawn application which included a supermarket. The supermarket has since been	<u>Text added:</u> Section 6.4, BSSA4, Design Principles:

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			with London Plan standards for all uses proposed at this site. Furthermore, the bus infrastructure in proximity to the site is protected, with any new development improving the waiting environment of the bus stop located on the High Road.	omitted, which was the use referred to as exceeding the London Plan standards. The Council always seeks to reduce parking as far as is practicable in line with policy T6 of the London Plan. See proposed changes as it relates to the adjacent bus stop.	<u>'Improve the waiting environment for adjacent bus stops DG and DK in consultation with TfL.'</u>
E07-18	Transport for London (TfL)	BSSA5 – Willesden Bus Depot	<p>The site description should be amended to reflect the fact that the site is in private ownership.</p> <p>Any proposals would need to be consistent with London Plan Policy T3 and London Plan Guidance (LPG) on Sustainable Transport, Walking and Cycling.</p> <p>The Agent of Change principle would need to be applied to any redevelopment to ensure that adequate protection for residents or occupiers was provided taking into account the 24/7 nature of bus garage operations.</p>	<p>It is agreed that the SPD should be amended to provide greater clarity on the site's ownership.. Reference to the agent of change reflecting the 24/7 operation is also appropriate.</p> <p>Section 6.5 BSSA5 – Industrial Spaces and Affordable Workspace identifies the need to retain the existing bus garage function, identifying opportunities for increased stabling provision and considering the spatial requirements arising from electrification. Relocation of existing offices can release more space for parking to serve the bus depot.</p>	<p><u>Added text:</u></p> <p>About the site, Section 6.5 BSSA5: <u>The Bus garage is privately owned by Metroline and operating TfL services. The garage operates over 100 buses and employs around 300 people including drivers, engineering and admin staff. It is an important site for the bus network and is currently protected from redevelopment that does not maintain its use as an operational bus garage with equivalent or increased capacity.</u></p> <p><u>Text added:</u> <u>Planning considerations:</u> Air Quality Management Area, Contamination Risk, impact on setting of heritage assets. <u>Any proposals would need to be consistent with London Plan Policy T3 and London Plan Guidance (LPG) on Sustainable Transport, Walking and Cycling. The Agent of Change principle would be applied to any redevelopment to ensure adequate protection for residents or occupiers, taking into account the 24/7 nature of bus garage operations.</u></p>
E08-1	Resident 3	General	Please share the number of the following facilities anticipated when the growth area completes, per 1,000 people within the Roundwood ward. I'd like two sets of data: the existing number of the following facilities per 1,000 people currently in Roundwood (now), and the number of facilities per 1,000 people in Roundwood	<p>Comment noted.</p> <p>Population: Latest Greater London Authority borough preferred population projections for the Roundwood ward, which take into account births, deaths, net migration, and the local housing</p>	No change.

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			<p>once the Church End growth plan & subsequent development completes, per 1,000 people in Roundwood & factoring in the additional number of people who are anticipated to live in the area due to the development:</p> <ul style="list-style-type: none"> • Medical facilities • Education facilities • Childcare facilities • Employment opportunities • Supermarkets (not local, corner shops) • Community centres such as youth clubs • Transport links: buses, trains • Open and green public space: m squared • 3 bedroom plus sized homes 	<p>development trajectory, estimate a 16,975 person population this year 2022, and a 23,120 person population at the end of the Local Plan and CEGA SPD period year 2041. For reference, the Local Plan and CEGA SPD plan for a minimum 1,300 new homes to 2041, which if delivered would be expected to accommodate approximately 3,250 people.</p> <p>Health provision: The North West London Integrated Care System (ICS) was consulted as officers developed the draft CEGA Masterplan SPD. The ICS stated by May 2021 that there is no need for an additional health hub/facility within the CEGA boundary. The draft CEGA Masterplan SPD also designates Site Allocation BSSA2 (B&M Home Store & Cobbold Industrial Estate) for redevelopment and provision of a health facility (approximately 1,855m²) should local needs and demand change, and subject to agreement with the ICS. A review of local health needs with the ICS is expected to take place every 5 years.</p> <p>Schools: Brent's latest School Place Planning Strategy 2019-2023 (November 2022 refresh) indicates that Brent will continue to have a high number of spare places across the primary system at a borough level. Brent 2022 school planning forecasts also confirm sufficient secondary school places to meet demand up to 2028/29 in all year groups. North Brent Secondary School is under construction in Neasden Lane. Further details on Brent's School Place Planning Strategy.</p> <p>Employment opportunities: Brent Local Plan policy is to deliver economic growth and employment opportunities for all. Church End contains Locally Significant Industrial Sites (LSIS) and Local Employment Sites (LES) designated to intensify industrial uses through co-location with residential uses. The CEGA Masterplan SPD articulates how redevelopment can deliver these principles, with the</p>	

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Page 212				<p>total amount of employment floorspace across the main Local Plan CEGA Site Allocations as follows:</p> <ul style="list-style-type: none"> - BSSA1 (Asiatic Carpets) (LES/LSIS): 17,673sqm - BSSA2 (B&M Home Store & Cobbold Industrial Estate) (LSIS): 16,727sqm - BSSA3 (Church End Local Centre): 3,995sqm - BSSA4 (Chapman's and Sapcote Estate) (LSIS): 23,343sqm - BSSA5 (Willesden Bus Depot): 6,479sqm - BSSA8 (McGovern's Yard): 1,760sqm <p>Redevelopment will be expected to improve the quality of industrial stock in then area, with the provision of modern light industrial facilities. The draft CEGA Masterplan SPD shows how all Site Allocations can increase the amount of employment floorspace, except BSSA1 (Asiatic Carpets) where the LES part of the Site Allocation designated for mixed use redevelopment since 2010 retains industrial floorspace, but at a lower amount.</p> <p>Supermarket: The SPD identifies a number of opportunities for new redevelopment and new retail floorspace, but makes no specific recommendations for a new supermarket. Proposals for any new supermarket in the CEGA would be considered within the context of any impacts on the vitality and viability of nearby town centres. Lidl has previously expressed interest in providing a new supermarket as part of redevelopment in the CEGA but no proposals are confirmed.</p> <p>Community Centres: The draft CEGA Masterplan SPD details Site Allocation policy requirements for new development to provide three (3) new community spaces and re-provide one (1) new public house as follows:</p> <p>BSSA1 (Asiatic Carpets)</p> <ul style="list-style-type: none"> - 1x community space recommended to be linked to the existing arts and film production, for training and employment for young people, approx. 900sqm. 	

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				<p>BSSA2 (B&M Home Store & Cobbold Industrial Estate)</p> <ul style="list-style-type: none"> - 1x health facility - subject to local demand and agreement with the ICS - approx. 1,855m2 - 1x Brent Enterprise Hub: approx. 900sqm <p>BSSA5 (Willesden Bus Depot)</p> <ul style="list-style-type: none"> - 1x Public House re-provision. approx. 480sqm <p>Transport links: TfL is responsible for London bus routes and services, as well as London Underground stations and services. Officers are not aware off any planned improvements to bus routes and services within the CEGA boundary, however new development is normally expected to provide financial contributions to TfL for buses. Officers are not aware of any planned improvements to Neasden Underground Station or Dollis Hill Underground Station. The Mayor's Transport Strategy identifies Neasden as a location for a new Overground Station on the proposed West London Orbital line, which subject to funding and approvals could see services start late 2020s. The draft CEGA Masterplan SPD has identified improvements for pedestrians and cyclists within the CEGA boundary, including connections to public transport, and new development is expected to contribute to:</p> <ul style="list-style-type: none"> - 9 roads for streetscape improvements - 11 crossing improvements - 4 cycle infrastructure interventions <p>Green spaces: The CEGA Masterplan SPD details Site Allocation policy requirements for new development to provide six (6) new green spaces, plus, two (2) pocket parks, totalling approximately 9,500m2 of additional green space as follows:</p> <ul style="list-style-type: none"> - BSSA1 (Asiatic Carpets): Residential Garden: 2000sqm - BSSA1 (Asiatic Carpets): Creative Square: 2000sqm - BSSA2 (B&M Home Store & Cobbold Industrial Estate): Linear Open Space: approx. 1000sqm 	

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Page 214				<ul style="list-style-type: none"> - BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Sport: approx. 1000sqm - BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Amenity: approx. 500sqm - BSSA3 (Church End Local Centre): Market Square: approx. 2000sqm - Denzil Road Pocket Park: approx. 500sqm - Conley Road Pocket Park: approx. 500sqm <p>The draft CEGA Masterplan SPD also identifies the need for improvements to existing open spaces.</p> <p>3 Bedroom sized homes: Brent's Local Plan and draft CEGA Masterplan SPD set the target that a minimum of 25% new homes are family sized dwellings (3 bedroom plus sized homes).</p>	
	E07-1 Resident 4	West London Orbital	Does the West London Orbital station name "Dudding Hill station" instead of "Neasden" have any significance, please? Did you just decide it yourselves as a 'place-holder', or has the West London Alliance or TfL had any hand in it? Is there any known current TfL policy on having the same name or different names for nearby stations on different lines? (e.g. Shepherds Bush, Hammersmith, Edgware Road, Shadwell, er...)	As per TfL's feedback, naming and clarifications are being added to ensure consistency with TfL's terminology.	Please see E07-2.
	E010-1 Natural England	General	Natural England have no comments to make on this consultation.	No comments.	No change.
	E011-1 Historic England	General	The draft SPD strikes a good balance, covers a range of interrelated spatial planning issues and represents heritage considerations well throughout. We welcome the emphasis upon a design-led approach to development which makes the link between heritage conservation and local distinctiveness. We recommend that the SPD draws out the importance of setting of heritage assets more, however, and that to makes reference to non-designated assets.	We welcome the support. The document has a dedicated section highlighting the importance of key historic sites as well as a map of where they are located on Section 5.4, Existing Framework.	No change.
	E012-1 Ministry of Defence (MOD)		The MOD have no concerns with the London Borough of Brent Draft Church End Growth Area SPD but would	Comment noted.	No change.

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			wish to be consulted of any potential development within the statutory height safeguarding zone that surround RAF Northolt, which consists of structures or buildings exceeding statutory safeguarding height criteria, or any development within the Birdstrike Safeguarding Zone surrounding RAF Northolt which includes schemes that may result in the creation of attractant environments for large and flocking bird species hazardous to aviation.		
E013-1	Simply Planning on behalf of Kelaty Properties LLP	Vision, Values & Objectives	Supportive of the vision, values and objectives of the plan. Asiatic Carpets have medium-long term ambitions to vacate their business from the land and to make the land available for a residential-led mixed-use development, which ties in fully to the allocation for the land within Policy BSSA1 of the Local Plan.	We welcome the support.	No changes.
E013-2	Simply Planning on behalf of Kelaty Properties LLP	Challenges	<p>Broadly in agreement with the key challenges, but we consider that two additional ones are required to be added, which is the need for the provision of additional housing and climate change.</p> <p>The Brent Local Plan identifies that the CEGA is required to deliver 1,300 new homes over the plan period to 2041, so delivering this level of housing in an area consisting of predominately brownfield and occupied sites must be one of the key challenges for the masterplan.</p> <p>In addition, in July 2019 the London Borough of Brent declared a climate and ecological emergency, which is Borough wide. Therefore, combating climate change must also be a key challenge of the CEGA SPD.</p>	The two points are considered relevant and the challenges section of the SPD can be amended to reflect them.	<p><u>Text added:</u> Section 3.2 Challenges</p> <p><u>3.2.7: Brownfield and occupied sites: CEGA is a well occupied area, with new growth and development primarily planned to be delivered on low density, but mainly occupied, industrial sites.</u></p> <p><u>3.2.8: Climate Change: Brent Council is committed to target carbon neutrality by 2030. Church End is one of the most deprived areas of the borough and could be more vulnerable to climate change impacts. Residents in more deprived areas are more likely to live in poorly ventilated homes with less access to green space and lack financial capacity to prepare for floods and heatwaves. Children, elderly people, and people with disabilities or existing health conditions are also more vulnerable from a public health perspective.</u></p>

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E013-3	Simply Planning on behalf of Kelaty Properties LLP	Opportunities	<p>Supportive of the majority of opportunities outlined in paragraphs 3.3.2 to 3.3.8 for the growth area.</p> <p>Consider that the ‘<i>appetite for change</i>’ is most relevant, given their willingness to see the regeneration of their land in the medium to long term.</p> <p>One opportunity we consider as a potential issue is the use of co-location and intensification for the delivery of new housing. Some areas of the plan are over ambitious as to the potential use of co-location and we consider better use could made of Asiatic Carpet’s land to deliver the vision and objectives of the masterplan.</p>	Individual schemes will be evaluated on their own merit and how they bring the comprehensive development of the area when they come forward for planning. Future proposals are expected to adhere to the principles and urban design framework set within the masterplan SPD and work in partnership with adjacent landowners to deliver new homes, jobs and infrastructure, and avoid compromising the potential wider development of the area.	No change.
E013-4 Page 216	Simply Planning on behalf of Kelaty Properties LLP	BSSA1 Asiatic Carpets	<p>Key concern is that the masterplan does not align with the designated industrial allocations contained within the Local Plan or London Plan.</p> <p>It was reassuring that the Council has already acknowledged an error in this matter during our discussions and that the masterplan would be revised accordingly ahead of adoption. However, the Town and Country Planning (Local Planning) (England) Regulations 2012 only requires the Council to outline how a consultation response received in relation to the SPD has been addressed, if the issue is raised during the formal public consultation period.</p> <p>Therefore, to ensure the concern is made during the formal public consultation period, and for the sake of completeness, we outline the issue again below. On page 70 of the draft CEGA SPD under the ‘<i>Industrial Spaces and Affordable Workspaces</i>’ section, it states as follows: “<i>LSIS Site: On the Asiatic Carpets site maximise industrial floorspace and affordable workspace. The retention of the film and production function around Neasden Studios is strongly encouraged. On the Cygnus Business Centre site retain existing businesses where possible, ensuring industrial floorspace is intensified and</i></p>	Agreed, the SPD needs to be amended to reflect the correct designation with LES indicating redevelopment to achieve the maximum viable employment space.	<p><u>Text revised:</u></p> <p>6.1 BSSA1: Asiatic Carpets – Industrial Spaces and Affordable Workspaces:</p> <p>LSIS-LES Site: On the Asiatic Carpets site <u>to achieve the maximum viable replacement of the existing employment floorspace.</u> maximise industrial floorspace and affordable workspace. The retention of the film and production function around Neasden Studios is strongly encouraged.</p> <p><u>LSIS Site:</u> On the Cygnus Business Centre site retain existing businesses where possible, ensuring industrial floorspace is intensified and access to a consolidated shared service yard is retained. 10% of new industrial floorspace is to be affordable.</p>

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Page 217			<p>access to a consolidated shared service yard is retained. 10% of new industrial floorspace is to be affordable. This appears to mis-identify our client's land as part of the LSIS, when in fact the 'Asiatic Carpets site' (i.e. the land west of Dalmeyer Road in our client's ownership) is not designated as LSIS. The requirements listed under this section are therefore also not in accordance with Policy BSSA1 of the newly adopted Local Plan. This states the following requirements for the allocation <i>"The premises west of Dalmeyer Road are a local employment site, and the east is designated as a Locally Significant Industrial Site (LSIS). Redevelopment will be consistent with London Plan policy E7 and Brent Local Plan policy BE2 and BE3. It will be subject to a masterplan-led approach, demonstrating comprehensive development will result in overall industrial floorspace totalling the maximum viable that can be achieved from the existing local employment site, and from the LSIS a minimum 0.65 plot ratio or the existing industrial floorspace total, whichever is the greater."</i> (our emphasis added)</p> <p>Therefore, the requirements of the local plan are as follows:</p> <ul style="list-style-type: none"> - Local Employment Site (i.e. west of Dalmeyer Road) – Overall industrial floorspace is the maximum viable that can be achieved; - LSIS (i.e. east of Dalmeyer Road) – Minimum plot ratio 0.65 or the existing industrial floorspace total <p>The above approaches are consistent with Policies BE2 & BE3 of the Local Plan. However, the wording of the SPD does not currently mirror this, as for our client's land the stated aim is to <i>'maximise industrial floorspace and affordable workspace'</i>, as opposed to the policy requirement to retain the maximum viable. The requirement for the floor space in the LSIS should also mirror the requirements of Policy BE2.</p>		

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			We welcome that the above misalignment between the Local Plan Policy and the masterplan will be addressed as part of the CEGA SPD ahead of adoption and we consider that the wording on this issue provided on page 70 should match that contained within Policy BSSA1 of the Local Plan.		
E013-5	Simply Planning on behalf of Kelaty Properties LLP	BSSA1 Asiatic Carpets Proposed Massing/Land Use Plans	<p>Concerns raised about the proposed massing and land use plan which is provided on page 71 of the draft CEGA SPD, reservations about the clarity of this approach as the SPD does not make it clear at any point this is how these plans should be used or perceived. We believe that inclusion of such a plan without explanation as to its purpose, will be misleading to all stakeholders involved with the growth area.</p> <p>Therefore, we consider a revision to the masterplan is required which undertakes one of the following:</p> <ul style="list-style-type: none"> ▪ Removal of the proposed massing / land use plans for all allocations within the document; or ▪ A very clear and detailed explanation as to the purpose of these plans, that they are not intended to show the final design or layout for the site allocations and that these will rather be formulated through pre-application discussions with the Council and a public consultation process as developments are brought forward within the allocations. <p>Failure to include this explanation is going to result in significant confusion as it would be understandable that members of the public would expect development to be delivered in line with these plans, unless it is made clear that this isn't the purpose of these plans within the adopted CEGA SPD. To ensure our concerns about the proposed massing / land use plans on page 71</p>	<p>Land use and massing plans for the site allocations articulate an acceptable form of redevelopment and an indication of the site's potential uses and development capacity. Detailed scheme proposals will however be evaluated on their own merit and their contribution to the comprehensive redevelopment of the area when they come forward at application stage. Future proposals are expected to adhere to the principles and urban design framework set within the SPD and work in partnership with adjacent landowners to avoid compromising the potential wider redevelopment of the site.</p> <p>Clarification of this will be provided by amending the SPD in relation to the purpose of the land use and massing plans.</p>	<p>Text added Section 4.2:</p> <p><u>4.2.2 Land use and massing plans articulate an acceptable form of redevelopment and an indication of the sites potential uses and development capacity. Detailed scheme proposals will however be evaluated on their own merit and how they contribute to the comprehensive redevelopment of the area when they come forward at application stage.</u> Future proposals are expected to adhere to the principles and urban design framework set within the draft SPD and work in partnership with adjacent landowners to avoid compromising the potential wider redevelopment of the site.</p>
E013-6	Simply Planning on behalf of Kelaty Properties LLP	Urban Design	The proposed massing and land use plan shows a primarily one storey industrial building within the heart of the allocation, which is set between public open space and residential-led buildings of 10 and 7 storeys.	The film studio has been placed in closer proximity to the High Road to reduce the need for large service vehicles to access the residential areas. Taller buildings have been allocated closer to the High Road as it is an intensification corridor.	No change.

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E013-7 Page 219			<p>This cannot be considered a good placemaking approach to development, as in land use and building heights. The central building will appear an alien and incongruous development in the streetscene. The service yard will also require enclosure, which will mean that the allocation will lose any sense of openness and will likely have unattractive metal fencing adjoining the public open space.</p> <p>We consider this building should be located to the north of the allocation, then a more composite mixed-use development could be provided using the central and southern area of our client's land.</p>	<p>Designs for the site allocation are illustrative and provide developers an indication of an acceptable urban planning and design approach to the potential site development. Individual schemes will be evaluated on their own merit and how they contribute to the comprehensive development of the area when they come forward for planning. Future proposals are expected to adhere to the principles and urban design framework set within the draft SPD and work in partnership with adjacent landowners to avoid compromising the potential wider development of the site.</p> <p>We suggest submitting a formal pre-application advice to discuss potential proposals further.</p>	
	Simply Planning on behalf of Kelaty Properties LLP	Affordable Workspace	The site layout shows the provision of four storeys of affordable workspace within our client's land. Policies BE3 and BSSA1 of the Local Plan only require our client's land to deliver the maximum viable replacement industrial floor space. It is therefore quite feasible that the scheme will result in a net loss of industrial floor space, meaning no affordable workspace is required to be provided under Policy BE1.	<p>The location of affordable workspace provision is illustrative. Clarification will be provided on that.</p> <p>As noted, if it is viable to replace more than 3,000sq.m. of employment floorspace, then in accordance with policy BE1, 10% of that floorspace should be affordable. This is considered to be quite possible on the Asiatic carpets site, especially given current values being achieved on industrial floorspace and demand for large scale indoor filming studios within the wider London area. It is accepted that the diagram as currently depicted is incorrect as the distribution of affordable workspace is unlikely to be so concentrated and the SPD will be amended to reflect this.</p>	Massing diagrams on Section 6 will be updated to indicate that affordable workspaces will be considered on the scheme's entirety.
	Simply Planning on behalf of Kelaty Properties LLP	Co-location within the LSIS	The land to the east of Dalmeyer Road is designated as Local Significant Employment Site (LSIS). Policy BE2 of the Local Plan identifies criteria a) to g) which are required to be met for co-location of residential uses within an LSIS to be accepted.	Designs for the site allocation are illustrative and provide developers an indication of an acceptable urban planning and design approach to the potential site development. Individual schemes will be evaluated on their own merit and how they contribute to the comprehensive development of the area when they come forward for planning.	Please see change E013-5.

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			<p>The proposed massing and land use plan shows no affordable workspace within the LSIS land and so accordingly does not meet the criteria of Policy BE2 for co-location to be acceptable.</p> <p>In addition, we do not believe the layout would provide a high standard of amenity or that the conflicts between land uses could be mitigated, given that all the land around the building is service yards for the retained industrial units.</p>	<p>Future proposals are expected to adhere to the principles and urban design framework set within the draft SPD doc and work in partnership with adjacent landowners to avoid compromising the potential wider development of the site.</p> <p>Clarification will be provided regarding the purpose of the massing/illustrations.</p>	
E013-8	Simply Planning on behalf of Kelaty Properties LLP	Deliverability	<p>Appendix F shows that 41 units would be delivered within the Cygnus Business Park (which is designated as LSIS) during the latter years of the SPD period. We consider that there is not a realistic route to the delivery of this housing. The SPD acknowledges that 35 freehold and leasehold occupiers are within Cygnus land, meaning that it will not be possible to mobilise this as a private development.</p>	<p>The masterplan SPD will support development up to 2041. Physical, social and economic conditions in the area will change over this time, and we support the opportunity for landowners to work together to redevelop the site.</p>	No changes.
E014-9	Simply Planning on behalf of Kelaty Properties LLP	Viability	<p>The appraisal shows the BSSA1 allocation option 1 (which is that with no major retail scheme and which closest resembles the masterplan scheme) as having a £448,465 surplus with 35% affordable housing. The testing shows this drops to a £186 deficit at 36% affordable housing. As such, a 1% increase in affordable housing results in an approximate £450k reduction in the viability of the scheme. The Policies of the Local Plan and London Plan, require 50% affordable housing and this is reflected on page 70 of the draft CEGA SPD. Therefore, a policy compliant affordable housing scheme will result in an approximate £6.3m deficit;</p> <p>The appraisal is based on August 2021 base rate building costs, which have significantly increased since this time due to increased in energy and building material costs. In addition, these costs do not account for the developments being required to be carbon zero, which will add a further substantial cost;</p>	<p>Brent Local Plan Policy BE3 requires the maximum viable replacement of existing employment floorspace on LES allocated for development. London Plan policy H5, criterion B3 requires mixed use development on non-designated industrial sites to provide 50% affordable housing only when redevelopment results in a net loss of industrial capacity. As such, providing the applicant reprovides existing industrial capacity, 35% affordable housing would be considered sufficient to meet policy H5 requirements. Given current values being achieved for industrial floorspace it is considered likely that this will be possible and that the viable 35% affordable housing provision can be achieved.</p> <p>Please refer BNPP response dated 6/2/23 at the bottom of this document – Annex A.</p> <p>Any financial viability issues will need to be tested at the planning application stage and a detailed assessment submitted with the planning application.</p>	No change.

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Page 221			<p>c. The two options assessed for the Asiatic Carpets site allocations do not reflect the schemes shown within the draft CEGA SPD;</p> <p>d. The benchmark land values vary between the two assessed options, whereas benchmark land values for the same sites should be consistent;</p> <p>e. The levels of affordable workspace are also not consistent with the massing and land use plans shown within the draft CEGA SPD; and</p> <p>f. The developer profit levels adopted in the options (these being 17% for private housing, 15% for commercial floor space and 6% for affordable housing) are unduly conservative for a complex development site such this, which includes multiple assets classes which would be largely speculative in nature and many potentially unknown development abnormalities.</p> <p>There will be a financial viability issues when our client progresses their site to planning application stage. Policy BE3 of the Local Plan requires the development of our client’s land to achieve the retention of the maximum viable levels of industrial floor space. The affordable housing policies of the Local Plan and London Plan require the provision of 50% of affordable housing to be acceptable. Therefore, if this is to be achieved, using the viability evidence which underpins the draft CEGA SPD, it will require a significant reduction in industrial floor space, as the maximum viable provision will be significantly depressed by the need to address the shortfall between the tested 35% affordable housing against the Policy requirement of 50%.</p>	<p>This will then need to be independently tested on the Council’s behalf and the conclusion of this assessment will inform the need for any amendment to affordable housing provision.</p>	
	E014-1	Environment Agency	Flood Risk	<p>We are pleased to see the SPD includes a Development Principle on FW1 Flood Risk Assessment, and that reference is given to all forms of flooding and the importance of considering climate change. All development within the growth area should be in accordance with the National Planning Policy</p>	<p>The principles within the SPD are there to address the specific issues faced by the Growth Area. In all cases applications will be assessed against the local Development Plan, including consideration of flooding.</p>

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			Framework (Chapter 14), London Plan Policy SI 12 Flood risk management, and Brent Local Plan Policy BSUI3 Managing Flood Risk.		
E014-2	Environment Agency	Sustainable Drainage System (SuDs)	We support Development Principle FW2 Sustainable Drainage and welcome the commitment that development proposals including a Sustainable Drainage Strategy. To strengthen this, we recommend that a stronger focus is specifically given to the use of sustainable urban drainage systems (SuDs). We would expect the SPD to more clearly demonstrate how development in this area can embed SuDs, in line with Brent Local Plan Policy BSUI4 which requires all major development to use appropriate sustainable drainage. This is also supported by London Plan Policy SI 13 <i>Sustainable Drainage</i> and Policy SI 5 <i>Water Infrastructure</i> (including the retrofitting of water efficiency measures). Therefore, we recommend that consideration is given to specific opportunities and the types of SuDs which can be incorporated across the Church End Growth Area.	This is agreed and the SPD will be amended to reflect the priority that should be placed on SUDs.	<u>Text Added</u> on Section 5.5 Climate Change and Sustainability Principle FW2 Sustainable Drainage: Reduce impact on the current drainage regime through a Sustainable Drainage Strategy, to manage the flow and rate of surface water entering drains and sewers through infiltration methods. <u>Methods used should prioritise naturalised Sustainable Urban Drainage Systems (SUDS) and should be incorporated into public realm buffer strips within developments sites as well as integrated in the public highway space where possible.'</u>
E014-3	Environment Agency	Air Quality	In reference to the Development Principles on Air Quality and Pollution on page 63, the policies in this SPD should follow Brent's Local Plan Policy BSUI2 <i>Air Quality</i> which states: "Major developments within Growth Areas and Air Quality Focus Areas will be required to be Air Quality Positive and elsewhere Air Quality Neutral. Where on site delivery of these standards cannot be met, off-site mitigation measures will be required". We note this policy does not fully reflect London Plan Policy SI 1 <i>Improving air quality</i> , which requires all major development requiring an Environmental Impact Assessment (EIA) to be air quality positive (AQ+ve) and all development (with some very minor exceptions) to be air quality neutral. Having said this, we also note that London SPDs on air quality positive and air quality neutral have not yet been published. Therefore, we	Development principle AQP1 reflects policy BSUI2. This states that all major development is required to be air quality positive. As noted, Brent Local Plan policy BSUI2 requires all major developments within growth areas to be air quality positive, which although different to London Plan policy, is adopted policy. To reflect this elevated policy status and the fact air quality positive development is required SPD principle AQP1 will be amended.	Text revised, Section 5.5 Development Principles: AQP1 Air quality positive: All major development should be air quality positive. <u>within Growth Areas and Air Quality Focus Areas will be required to be Air Quality Positive. Where on site delivery of these standards cannot be met, off-site mitigation measures will be required.</u> Design should be informed by a preliminary Air Quality Assessment and Air Quality Positive Statement to ensure air quality is considered from the outset. (Local Plan policy BSUI2)

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			recommend revisiting this policy when they are available.		
E014-4	Environment Agency	Green and Open Spaces	To strengthen Development Principle UBH2 Biodiversity gains, we recommend that this policy specifically references a minimum net gain in biodiversity. In line with the Environment Act 2021, this should be a minimum of 10% net gain. However, a higher gain in biodiversity in this area of the borough would help to promote the improved social behaviours and health benefits for this more deprived area, in line with the SPD's vision. It is also important to note that if the baseline of biodiversity is already low in this area, then higher gains can be made more easily and so should not be avoided.	The sites currently lack biodiversity. As such it is considered that the Urban Greening Factor requirement of UBH1 is likely to far exceed a 10% net gain in biodiversity. Nevertheless, for clarity the SPD development principle can be updated to strengthen biodiversity gains.	<u>Text added:</u> UBH1 Urban Greening factor: Aim to meet the Urban Greening Factor (UGF) of 0.4 for developments that are predominantly residential and 0.3 for those predominantly commercial (excluding B2 and B8 uses). <u>The minimum net gain in biodiversity should be 10% in line with the Environment Act 2021.</u> (London Plan policy G5)
E014-5	Environment Agency	McGovern's Yard	In reference to site allocation BSSA8: McGoverns Yard, the 'Green, Open and Play Spaces' noted on page 90 does not suggest on site improvements. Green infrastructure such as green roofs, green walls and tree planting could still be considered despite a lack of space. There is also the potential for the use of bee bricks, bat bricks or bird nest boxes throughout the new buildings. These should all still be implemented in addition to any offsite green spaces. Therefore, we recommend further consideration is given to the biodiversity improvements that can be delivered on this site.	SPD principles UBH1 and UBH2 require the provision of on-site greening enhancements. The green, open and play space references are explicitly in reference to dedicated public open spaces, which cannot realistically be delivered on this site. Therefore, contributions for off-site local provision within the growth area are being sought. This will facilitate delivery in a more appropriate location. Nevertheless, clarification can be provided on the provision of other green infrastructure in relation to Policy BSSA8 in the SPD.	<u>Text added</u> , BSSA8, Policy Requirements Green, Open and Play Spaces: Due to the nature of the site there is limited scope for introducing new green spaces. <u>Green roofs, green walls, tree planting and elements that support biodiversity are encouraged.</u> Financial contributions will be required towards off-site open space and play provision.
E014-6	Environment Agency	Waste	Regarding waste management, we would expect the SPD to support London Plan Policies SI 7 <i>Reducing waste and supporting the circular economy</i> , and Policy SI 8 <i>Waste capacity and net waste self-sufficiency</i> . This would include ensuring that there is sufficient space within developments for refuse collection vehicles; the separation of waste collections (household and recycling); and ensuring that demolition waste produced during construction is re-used on site to the greatest extent possible.	Waste management plans will ensure sufficient space is provided in accordance with standard requirements, and that these are well located and serviceable, and provide for the various wastes produced in a mixed-use development. Principles W1 and W2 require the consideration of the circular economy which addresses reductions in demolition/construction waste. The Growth Area does not include a dedicated waste facility. As noted above, the removal and storage of waste from individual developments will be outlined	<u>Text added</u> , Section 5.5, Development Principles: W3 Storage: Carefully consider refuse storage and collection systems that support recycling, in the context of a mixed-use industrial and residential development. Development should be supported by a Site Waste Management Plan and Operation Waste Management Plan. (London Plan policy D6, and SI7 <u>and Policy SI 8</u>).

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			As a general comment when planning development in growth areas, we strongly recommend that waste sites and operations are kept separate to residential development areas, to minimise the possible conflict between regulated industry and residents regarding issues such as pollution (noise, dust, odour etc).	in waste management plans, ensuring the various conflicts between residential and industrial uses are addressed in accordance with principle W3. Reference within the SPD related to principle W3 to policy SI 8 is however considered appropriate.	
E014-7	Environment Agency	Contamination	<p>The sensitivity of this area in respect to groundwater vulnerability is low, however we have the following comments to make regarding contamination and land quality.</p> <p>In reference to Development Principle AC4 Contamination, it should be ensured that any preliminary risk assessment and subsequent site investigation and remediation strategies at sites with land affected by contamination should be undertaken by a competent person. The National Planning Policy Framework (NPPF) paragraph 183c) defines a competent person (to prepare site investigation): “A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation”.</p> <p>Please also see the following generic advice with respect to contaminated land issues:</p> <ul style="list-style-type: none"> - Specific National Planning Policy Framework (NPPF) paragraphs 174 and 183 should be considered - Relevant guidance such the Environment Agency’s Approach to Groundwater Protection and Land Contamination Risk Management (LCRM) should be promoted - The Approach to Groundwater Protection should be considered with regard to development proposals that we would object to in principle. - Policies should require developers to submit a Preliminary Risk Assessment (PRA) 	The Council will only recognise associated risk assessments which have been prepared by professionals. This is a detail which is already included in the NPPF as you note and does not require duplication here. The same is true of the rest of the guidance, which although welcomed, is not required for inclusion within the SPD itself. The SPD’s principle AC4 would however benefit from additional reference to the stages post any preliminary contamination risk assessment.	<p>Text added, Section 5.5, Development Principles, Agent of Change and Contamination:</p> <p>AC4 Contamination: Ensure development does not increase exposure to contamination. A preliminary contamination risk assessment <u>and subsequent site investigation and remediation strategies</u> will be required, and any necessary remediation measures followed before construction commences. (Local Plan policy DMP1)</p>

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			<p>together with a planning application where land is potentially contaminated.</p> <ul style="list-style-type: none"> - Policies should require developers to ensure sites are suitable or made suitable for intended use. - Policies should require developers to prevent discharges to ground through land affected by contamination. 		
E014-8	Environment Agency	Site Allocations	<p>In consideration of the six site allocations detailed in Chapter 6, site specific geology will need to be considered for developments where deep piled foundations are proposed. Should deep foundations penetrate through the London Clay to deeper, more sensitive aquifers, then it is likely that a Foundation Works Risk Assessment (FWRA) would be required to ensure that the risks to groundwater are minimised.</p> <p>Certain industrial activities (such as an installation or waste activity) will require an Environmental Permit. Operators of any sites allocated for industrial use should use the guidance for specific permitting requirements for their site, and if further guidance is required then contact the Environment Agency.</p>	<p>Permits may be required but these will not be a planning consideration, and therefore, will not require inclusion within a planning decision. Nevertheless, reference to considering the impact of foundations on ground water within the SPD for site allocations more likely to accommodate taller buildings is considered appropriate.</p>	<p><u>Text added:</u></p> <p>Policy requirements – Planning Considerations BSSA1, BSSA2, BSSA4, BSSA5:</p> <p><u>Site specific geology will need to be considered for developments where deep piled foundations are proposed. Potential need for a Foundation Works Risk Assessment (FWRA) could be required to ensure that the risks to groundwater are minimised.</u></p>
E015-1	Greater London Authority (GLA)	General	<p>In relation to the Mayor’s opinion on general conformity with the London Plan, it is considered the SPD is in general conformity with the London Plan subject to collaboration in relation to London Plan Policy E7. However, further work is needed to address and clarify matters. For example, on building heights, industrial capacity and mix of uses.</p> <p>While we welcome the work done to date, in particular the prior engagement programme and involvement of local businesses, landowners and the wider community, it is unclear whether the preparation of this Masterplan aligns with guidance set out in the ‘Industrial intensification and co-location through plan-led and masterplan approaches’ Practice Note in regard to Stage 1 and Stage 2 outputs. In particular, collaboration</p>	<p>We welcome the Mayor’s consideration that the SPD is in general conformity with the London Plan.</p> <p>On London Plan policy E7, criteria B states the following regarding co-location on LSIS: ‘This approach should only be considered as part of a plan-led process of SIL or LSIS intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications.’ This makes it clear that co-location through masterplanning can take place on LSIS land providing it is either plan-led (i.e. designated for such uses in an adopted Local Plan), <u>or</u> it is masterplanned in</p>	No change.

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Page 226			with the Mayor and his representatives in exercising his planning functions is at a relatively early stage.	<p>collaboration with the Mayor. Note that if it is planned, collaboration with the Mayor is not explicitly required, and therefore cannot be a consideration when determining if its delivery is in general conformity with the London Plan. Brent's Local Plan identifies the LSIS sites included within the Church End Growth Area Masterplan for masterplan-led co-location through Local Plan site allocation policies BSSA1, BSSA2, and BSSA4. Nevertheless, the LB Brent appreciate the GLA's reasonable input, and wish to work with them to meet the strategic needs of the Greater London Area.</p> <p>Brent Council has consulted the GLA throughout the development of the masterplan. The initial discussion in February 2021 took place prior to masterplan design development to ensure we followed the correct process for the masterplan adoption. Once the first draft designs were developed, they were shared on October 1st 2021 with the GLA for feedback but we received no responses. Also, the project was match funded under the GLA Homebuilder Capacity Fund. In this situation it is reasonable of the Council to expect the GLA to be aligned in considering compliance with relevant policies.</p> <p>The team also met with the GLA on the 1st November 2022. At the meeting, the process for developing the masterplan was highlighted, including all engagement activities listed by the end of this document. Changes have been incorporated as part of the new version of the document to emphasize more clearly the approach for employment spaces on LSIS and LES.</p> <p>The masterplan SPD follows the 'Industrial intensification and co-location through plan-led and masterplan approaches' by looking at LSIS sites; drawing on evidence of industrial supply and demand and identifying spatial context and non-</p>	

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				<p>standard uses. Once options had been appraised, it proposed areas for intensification and co-location and a quantum of industrial capacity that needs to be delivered, balancing specific local needs which have been addressed by the local community, i.e. lack of green spaces, need for community spaces and affordable homes to help tackle deprivation, housing overcrowding and health related issues.</p> <p>The review post statutory consultation has presented a final opportunity to review and amend the document, so it complies with GLA standards.</p>	
E015-2 <div>Page 227</div>	Greater London Authority (GLA)	General	Clarification and transparency which makes clear commitments to prioritising industrial re-provision, intensification and increased capacity for a range of industrial uses identified in London Plan policy E4.	A primary overarching principle of the document is Development Principle IE1. This requires industrial floorspace to be maximised on LSIS land, and for developments to achieve a minimum plot ratio of 0.65. Development Principle IE4 makes clear the need for a range of industrial uses to meet need, specialisms for which are noted against each individual site allocation. This is in accordance with Local Plan policy BE2, and London Plan policies E4-E7. Nevertheless, it is accepted that there is potential to strengthen these principles to better reflect development plan policies and aspirations by amending the SPD Principle IE1 and IE4.	<p><u>Text added</u>, Section 5.1 Land Use,</p> <p>Development Principle IE1: ‘Maximise industrial floorspace through intensification. On Locally Significant Industrial Sites (LSIS), increase industrial floorspace with a target of achieving a minimum 0.65 plot ratio <u>or existing, whichever is greater. Development on LSIS must not result in a net loss of industrial floorspace</u> (Local Plan policy BE2).’</p> <p>Development principle IE4 ‘Provide a range of high quality industrial floorspace which is fit for purpose and reflective of borough needs, having regard to the site specific clusters and potential for specialisms as identified in the site allocations. <u>For LSIS only those uses listed under criterion A of London Plan policy E4 are acceptable</u> (Local Plan policy BE2).’</p>
E015-3	Greater London Authority (GLA)	General	Clarity and transparency on the amount of industrial land to be lost, industrial capacity to be retained and reprovided and a breakdown of floorspace by use existing and proposed.	The SPD provides the amount of floorspace that needs to be re-provided on sites, this is either 0.65 plot ratio on LSIS or existing industrial floorspace, whichever is the higher. This is likely to result in greater industrial floorspace provision than currently	Appendix F included to clarify quantum of employment space re-provided on LSIS.

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				exists. This is in part because not all LSIS is used for Policy E4 compliant uses currently. It will be for the developer to propose the appropriate floorspace at the application stage. On LES it will be the maximum viable re-provision. Limiting the scope of what can be provided in terms of size and use of individual units is unlikely to be robust in terms of its flexibility to deliver an enduring masterplan. It is best that the market reflects needs as and when they arrive rather than the SPD being overly prescriptive.	
E015-4	Greater London Authority (GLA)	General	Amendment in the opening sentence of Paragraph 2.4.2 of the draft Masterplan SPD to delete reference to SIL. London Plan Policy E7 does not support co-location of industrial and residential use on SIL.	The London Plan does allow for intensification of SIL for industrial purposes, to potentially release parts for non-industrial uses including residential. Nevertheless, as Church End does not contain SIL, the reference to SIL shall be removed.	Text removed: Paragraph 2.4.2 'To meet these competing land pressures, London Plan Policy E7 allows for the intensification of Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) through the co-location of industrial and residential uses.
E015-5	Greater London Authority (GLA)	General	A commitment to maintaining and securing a variety of industrial uses on LSISs including prioritising B2 and B8 floorspace, not just E class uses to ensure the full range of industrial uses as set out in London Plan policy E4 (as suitable for LSIS) and the Local Plan Policy BE2 is provided for. While the masterplan makes clear that much existing industrial land will remain, the amount of new/reprovision is unclear.	The SPD makes clear that all potential industrial uses are appropriate, including B2 and B8 uses. Explicit reference to B2 and B8 uses is made under a number of figures, suggesting future land use potential. The document does not seek to prescribe specific industrial uses. This would not be appropriate. Uses will be determined by a range of variables, including existing on-site uses and their desire to be worked into any redevelopment, and market demand which will change over time. See proposed change for E015-2 with regards to Development Principle IE4 making explicit the range of uses appropriate within LSIS referencing policy E4. For Local Employment Sites, policy BE3 makes clear the range of appropriate uses.	Proposed change to include table (Appendix F) setting out existing and new provision of employment floorspace across site allocations. Appendix B and Appendix F LSIS sites allocation proposals are for workshops/light industrial uses and floorspace in line with relevant planning policy, with references to supermarket uses removed.
E015-6	Greater London Authority (GLA)	General	A commitment to phasing to ensure that the intensified industrial development is delivered and completed in advance of the residential component as per policy E7 and the Practice Note.	The London Plan refers to only the intensified industrial being completed before residential occupation, not re-provided industrial space in a mixed-use LSIS scheme. Nevertheless, it is agreed that in principle industrial elements of co-located	Added principle Industrial & Employment: <i><u>IE7 Phasing: 'On LSIS sites where residential is co-located with industrial, the industrial elements must be completed</u></i>

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				schemes, or schemes which intensify on one site to make space available for non-industrial use should be completed prior to occupation of that other use. The SPD IE7 principle can be amended to reflect this.	<i>in advance of any residential element being occupied, in accordance with criterion D2 of London Plan policy E4. This should be conditioned to ensure compliance.'</i>
E015-7	Greater London Authority (GLA)	General	Amendment of text and design principles to accurately reflect the London Plan Agent of Change (Policy D13). This requires noise sensitive uses to be designed and located to ensure there is no detrimental impact on existing industrial uses and to enable industrial areas to continue to operate successfully.	It is considered that the wording of Development Principle ACC1 in addition to paragraph 5.5.7 is sufficient, particularly given it references London Plan policies D13 and E7 directly, making explicit that the wider development plan requirements will be required. It is not considered necessary to further replicate this material.	No change.
E015-8	Greater London Authority (GLA)	General	Clarity on the status of the three LSISs going forward. We request the boundaries of the LSIS be indicated within the masterplan.	Accepted and the SPD will be amended to reflect the clear delineation of the LSIS boundaries.	Clear delineation of the LSIS boundaries to be indicated on figure 10.
E015-9	Greater London Authority (GLA)	General	Assurance that the approach is consistent with London Plan Policy E1 Offices which seeks to focus new office provision within town centres.	The SPD makes clear the range of uses which are appropriate for LSIS and LES sites, in accordance with policies E4 and BE2, and BE3 respectively. As such, unless existing offices are redeveloped, no further non-ancillary office space will be acceptable. Given the existing emphasis on industrial floorspace delivery, it is not considered necessary to include explicit reference to office uses and policy E1.	No change.
E015-10	Greater London Authority (GLA)	General	<p>Clarification that sufficient yard space has been provided to meet the operational needs of the majority of existing and future industrial users. It should be ensured that the proposed development is designed to minimise conflict between movements, in particular access, servicing and delivery arrangements. Interfaces between existing and proposed uses should be appropriately managed through public realm interventions to ensure safety of occupiers and residents.</p> <p>A low quantum of public realm is proposed which is not proportionate with the forthcoming density. We query</p>	It is considered that Development Principle TM3 makes clear the need to consider logistics and servicing arrangements, and along with Principles IE3 and H5, will ensure conflict between various uses will be minimised. The various measures to ensure this is achieved and amenity protected are included under the road typologies on page 37, and includes explicit reference under industrial yard for the need to have a green buffer between industrial and residential. Yard space arguably falls within the parameters of servicing however, explicit reference to it is made in E7, so on this basis for clarity reference can be made to it in the SPG.	<p>Text added, Section 5.2, Development Principles, Traffic Management:</p> <p>Development Principle TM3: 'Development should be informed by Delivery and Servicing Plans. These should balance providing adequate access, <u>yard space</u> and servicing arrangements for industrial/commercial uses and residents whilst protecting amenity.' Technical innovation to consolidate delivery and construction transport as well as the use of non-motorised freight transport is supported and encouraged, including</p>

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			the quality of the residential environment as a result of this.	The masterplan provides a balance of competitive uses. The sites, due to their intensity of use have comparatively high land values. This together with policy requirements such as maximising re-provision of industrial floorspace limit space to be freed up for non-built form. Public realm is provided to ensure connectivity is maximised but is reflective of the higher densities that are relatively characteristic of the wider area.	provision for electric vehicles. Consideration should be given to imposing safety standards for delivery and servicing vehicles at the site: minimum of FORS Silver, preferred of FORS Gold for all HGVs). (Local Plan policy BT3)
E015-11	Greater London Authority (GLA))	General	Clarification in the massing diagrams within Section 6 (Site Allocations) where indicative heights range from 6-10 storeys. This should be expressed in metres to align with the Local Plan's 18m threshold for tall buildings and the Brent Tall Buildings Strategy.	Diversity of uses will vary building heights. It is considered the masterplan is more flexible if it indicates building heights in storeys rather than meters. Clarity will be provided as part of the image's subtitle.	Heights in m have been added within massing diagrams subtitle.
E015-12	Greater London Authority (GLA))	General	Clarification/evidence that Local Plan Policy BE2 Strategic Industrial Locations and Locally Significant Industrial Sites is complied with, in particular net increase (b), figures are needed to demonstrate this, c) mix of uses especially storage, distribution and general industrial and potential conflict between uses (g): some wording changes are needed to better reflect the Agent of Change principle.	This has been dealt with in responses to previous points.	See proposed changes against E015-2 & E015-3. See comments against E015-07.
E015-13	Greater London Authority (GLA)	4.2 The Masterplan P28	A masterplan is required for Industrial co-location proposals in compliance with Policy E7B & D – It is unclear what iterative process Brent has been through with the Mayor and the GLA to distinguish an appropriate masterplan under Policy E7 in line with the industrial intensification practice note. Officers would welcome further engagement with the GLA to explore design principles to ensure high quality residential development is established alongside effectively operating Industrial uses. Masterplan should include Local Strategic Industrial Site boundaries.	The GLA's reasonable input, and the opportunity to work together to meet the strategic needs of the Greater London Area, and improve on the SPD and its outcomes is welcomed. Brent Council has consulted the GLA throughout the development of the masterplan. The initial discussion in February 2021 took place prior to masterplan design development to ensure the correct process for the masterplan adoption was followed. Once the first draft designs were developed, they were shared on October 1 st 2021 with the GLA for feedback but also no responses were received. The project was match funded under the GLA Homebuilder Capacity Fund with the GLA so	Clear delineation of the LSIS boundaries to be indicated on figure 10.

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Page 231				<p>it not unreasonable of the Council to assume that as was the case with the Neasden Stations masterplan work that the GLA has been similarly aligned in considering compliance with relevant policies.</p> <p>The team also met with the GLA on the 1st November 2022. At the meeting, the process for developing the masterplan, including all engagement activities listed by the end of this document was shared with those GLA officers. GLA officers clarified the need for demonstrating more clearly in the document the approach for employment spaces on LSIS and LES. These are changes that have been incorporated into the revised document to be adopted.</p> <p>The masterplan follows the 'Industrial intensification and co-location through plan-led and masterplan approaches' by looking at LSIS sites; drawing on evidence of industrial supply and demand and identifying spatial context and non-standard uses. Once options had been appraised, it proposed areas for intensification and co-location and a high quantum of industrial capacity that needs to be delivered, balancing specific local needs which have been addressed by the local community, i.e. lack of green spaces, need for community spaces and affordable homes to help tackle deprivation, housing overcrowding and health related issues. The post statutory consultation a final review and amendments to the document have occurred so it complies with GLA standards.</p>	
	E015-14 Greater London Authority (GLA)	5.1 Land Use Development Principles Industrial & Employment P32	<p>IE1 Query the rationale for calculating the plot ratio. What does it accommodate space for? Does it include Amenity space for workers etc?</p> <p>IE1 Could provide more advice on how to intensify sites? Refer to policy E7 / relate to industrial design principles provided later in the document.</p>	<p>The 0.65 plot ratio reflects requirements of Local Plan policy BE2. It only includes the internal industrial floorspace, including any ancillary and supporting internal floorspace. The 0.65 plot ratio was previously included in the London Plan, and was evidenced as both deliverable, and having the potential to result in a general increase in industrial floorspace. This was evidenced by the GLA through the 'Analysis of plot ratios in industrial development</p>	<p>References to the GLA Industrial Intensification and Co-Location study to be added in the references section, Appendix G.</p>

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Page 232				<p>in London' evidence base document. The 0.65 has been shown to be generally deliverable in a number of industrial only, and co-located schemes within the borough.</p> <p>The SPD includes potential design solutions and principles on Section 5.4 Proposed Framework and includes explicit design principles under the same section. Contemporary approaches to industrial co-location are few, but given increased demand, developer appetite and understanding and GLA policy, as a concept it is likely to advance rapidly in the coming years. As such, these are considered sufficient for the purposes of the SPD.</p> <p>It is considered that Development Principle TM3 makes clear the need to consider logistics and servicing arrangements, and along with Principles ACC1 on the Agent of Change, IE3 and H5, will ensure conflict between various uses will be minimised. The various measures to ensure this is achieved and amenity protected are included under the road typologies on page 37. This includes explicit reference under industrial yard for the need to have a green buffer between industrial and residential.</p>	
	E015-15 Greater London Authority (GLA)	5.1 Land Use Development Principles Housing P33	IE3 Residential Co-location: Design mitigations should be applied to new resi units to allow for continued optimal use of existing industrial units. In line with Policy E7, it should be ensured that the proposed development is designed to minimise conflict between movements, in particular access, servicing and delivery arrangements. Interfaces between existing and proposed uses should be appropriately managed though public realm interventions to ensure safety of occupiers and residents. A low quantum of public realm is proposed which is not proportionate with the forthcoming density, officers query the quality of the residential environment as a result of this. Visual imagery or diagrammatic sections to support	<p>Section 5.4 Design principles identify key principles to support mixed use developments.</p> <p>The masterplan SPD seeks to strike a balance between green spaces and building heights. CEGA is within an open space deficiency area and so provision of green spaces are one of the area's top priorities. Nevertheless, in order to provide the needed green space provision, enough development is needed to help fund the spaces. Building heights are within the limit as the area sits outside Brent's Building Strategy.</p> <p>Development Principle TM3 makes clear the need to consider logistics and servicing arrangements, and</p>	No change.

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			development principles that relate to the local context would help to provide clarity on this.	along with Principles IE3 and H5, will ensure conflict between various uses will be minimised. The various measures to ensure this is achieved and amenity protected are included under the road typologies on Section 5.2 Proposed Framework. This includes explicit reference under industrial yard for the need to have a green buffer between industrial and residential. It is however agreed that there needs to be explicit reference to the requirement for sufficient yard space which has been addressed in TM3.	
E015-16 Page 233	Greater London Authority (GLA)	5.1 Land Use Development Principles Housing P33	<p>Housing policy headers could be confused with similarities to London Plan Housing policy references.</p> <p>H5 Residential Co-location: Currently refers to London Plan policy D13. Should also refer to Policy E7.</p> <p>H6 Accessible and Adaptable housing: refers to London Plan policy D7 should also refer to D5.</p>	Agreed, the titles for section 5.1 of the SPD will be simplified where possible.	<p><u>Text revised, Section 5.1 Development Principles:</u></p> <p>Housing Residential R1 Housing Target R2 Housing Mix and tenure R3 Specialist accommodation R4 Quality R5 Residential-Co-location R6 Accessible and adaptable housing</p> <p><u>Text added:</u> R5 Co-location: London Plan policy D13 & E7.</p> <p>R6 Accessible and adaptable: London Plan policy D7 & D5.</p>
E015-17	Greater London Authority (GLA)	5.1 Land Use P32-33	Repetition of development principles IE3 & H5. Officers advise that H5 focuses on the proposed design mitigations for new residential uses to ensure that existing industrial units can operate to optimal use. IE3 could focus on ensuring an appropriate mix of industrial uses alongside industrial are chosen.	Agreed, IE3 should be amended within the SPD to focus on appropriate mix of uses operating at optimal use. IE4 already addresses the required mix of uses.	<p>Text revised:</p> <p>IE3 Residential Co-location: <u>Deliver new industrial that provides an appropriate mix of uses that can operate to optimal use.</u> housing that can sit comfortably alongside new industrial spaces. Mitigate any potential conflicts between uses and provide high quality environment for both residents and businesses.</p>

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E015-18	Greater London Authority (GLA)	5.2 Movement and Connectivity Proposed Framework P36	The movement hierarchy is a useful tool however could provide more detail to ensure clarity on the management of movement conflicts that could occur.	Comment noted. In addition to following Healthy Streets design principles and associated guidance low speeds across the masterplan area will further improve cycle and pedestrian amenity as well as reduce risk of collision and injury in general and to the more vulnerable road users in particular. This is highlighted on section 5.2 Proposed Framework.	Text added para 5.2.3: <u><i>“An area wide 20mph speed limit is proposed with the aim to further support measures designed to enhance facilities and spaces for active and sustainable travel. In addition to following Healthy Streets design principles and associated guidance and calming measures such as improvements at junctions, speed humps, raised tables, introduction of trees in build outs or green buffer strips/SUDs, low speeds across the masterplan area will further improve cycle and pedestrian amenity as well as reduce risk of collision and injury in general and to the more vulnerable road users in particular.”</i></u>
E015-19	Greater London Authority (GLA)	5.2 Movement and Connectivity Development Principles Traffic Management P42	TM3 logistics – residential access should be separate to industrial uses. – existing industrial uses should have continued effective operation.	Development Principle TM3 makes clear the need to consider logistics and servicing arrangements, and along with Principles IE3 and H5, will ensure conflict between various uses will be minimised. The various measures to ensure this is achieved and amenity protected are included under the road typologies on Section 5.2 Proposed Framework. This includes explicit reference under industrial yard for the need to have a green buffer between industrial and residential. It is however agreed that there needs to be explicit reference to the requirement for sufficient yard space which has been addressed in response to rep E07-11.	Please see rep E07-11.
E015-20	Greater London Authority (GLA)	5.3 Green and Open Spaces Open and Green Spaces P45	Whilst site constraints are recognised, the provision of increased residential capacity should be supported by public realm improvements and open space contributions. Potential to include roof gardens, pocket parks, greening boundaries between uses to provide mitigations to industrial uses. In order to establish a high-quality residential environment.	It is considered that this is achieved through a combination of Development Principles OGS1, OGS2, and OGS5. OGS1 seeks the delivery of new dedicated open spaces, as specified in the site allocations; OGS2 requires their connectivity with each other and the wider green grid; and OGS5 requires the general enhancement of the public realm through greater greening. This theme is recurrent throughout the	No change.

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				document which seeks to improve the public realm for occupants, and biodiversity potential for wildlife.	
E015-21	Greater London Authority (GLA)	5.3 Green and Open Spaces Public Realm P50	Open spaces and public realm should be inclusive and accessible for all. London Plan policy D8 should be included in development principles, with the current study reflecting poor accessibility to existing open spaces.	PL3 Inclusiveness addresses the point made.	No change.
E015-22	Greater London Authority (GLA)	5.3 Green and Open Spaces Play and Recreation P46	<p>PLR2 Co-location of uses: unsure of wording – does it mean the provision of a variety of play opportunities for all ages? The terminology of the header could be altered to avoid confusion.</p> <p>PLR3 Inclusiveness – refers to London Plan Policy S4 (play and informal recreation) – officers suggest renaming as point does not acknowledge inclusive principles. Officers welcome inclusive play.</p>	Wording in PLR2 can be amendment to provide clarification.	<p>Wording revised:</p> <p>5.3 Green and Open Spaces/ Development Principles</p> <p>PLR2 Co-location of uses: Co-locate formal play areas, informal play spaces and informal recreation spaces with places to dwell. Spaces should be designed to encourage social interaction <i>and a variety of play opportunities for all ages</i> between all age groups in the community. (London Plan policy S4)</p> <p>PLR3 Inclusiveness <i>Inclusive Play</i>:</p>
E015-23	Greater London Authority (GLA)	5.3 Green and Open Spaces Public Realm P50	PR5 Trees: repeats UBH4 Trees, is this intentional/necessary.	Agreed, repeated reference as set out in UBH4 in the SPD should be removed.	Removed UBH4 trees.
E015-24	Greater London Authority (GLA)	5.4 Building Design and Architecture Design Principles P54	<p>Industrial design principles reflect good urban design principles. Suggest re-wording to encourage the provision of successful active frontages. I.e, Most active uses or operational making areas should be positioned at ground floor level along the street. Ensure high levels of visual permeability of ground floor uses adjacent to the street.</p> <p>The provision of green roofs / open spaces to provide amenity space for workers and residents creating better places. (Refer to the Industrial intensification and co-location study)</p>	<p>Agreed, an additional emphasis on active frontages in the SPD will ensure better place-making and vitality outcomes.</p> <p>It is agreed that green infrastructure can assist in improving amenity outcomes for employees in Church End and the SPD should reflect this.</p>	<p><u>Text updated</u> Section 5.4 Building Design and Architecture Design principles:</p> <p>Provide positive <u>active</u> frontages and support place-making. Improving the setting of existing heritage assets, creating positive street frontages and addressing open spaces can do this. It also ensures a positive relationship with adjacent neighbours. <u>Active uses or operational making areas should be positioned at ground floor level along the</u></p>

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Page 236 E015-25					<u>street. Ensure high levels of visual permeability of ground floor uses adjacent to the street.</u>
					Provide positive frontages and support placemaking. Improving the setting of existing heritage assets, creating positive street frontages addressing open spaces can do this. It also ensures a positive relationship with adjacent neighbours. Provide quality urban environment and amenities for workers making better use of open spaces. Ensure there is a positive relationship with neighbours.
	Greater London Authority (GLA)	5.4 Building Design and Architecture Development Principles P55	SCT2 Intensification and Co-location: As well as referring to design principles mentioned earlier in the document, consideration should be given to the existing local context for each site allocation, to influence the proposed development.	SCT2, in combination with the design principles identified on P54, are in specific reference to the complicated design considerations surrounding co-locating residential with industrial. In all cases, as with all planning applications, the immediate and wider local context will be a key consideration. As such, the suggested change is not considered necessary.	No change.
E015-26	Greater London Authority (GLA)	5.4 Building Design and Architecture Building Heights P60	<p>Massing diagrams included on site allocations contradict the building heights statement. 'None of the proposals exceed 6 storeys (approx. 18m) With heights up to 10 storeys represented in the site allocation. – this would mean the provision of tall buildings by definition of the London Plan- This is not an allocated area for tall buildings in the Brent tall buildings strategy, as such would not be in compliance with Policy D9 of the LP2021. Clarification on proposed density should be provided.</p> <p>It would be helpful to distinguish between principles through an amendment of terminology. With the use of 'Must', 'Should' and 'Could' to provide a helpful prioritisation of requirements.</p>	<p>Paragraph 5.4.15 is discussing the existing heights, particularly in relation to Hornby Court to the end of Church Road, and not future proposals. The text can be amended to provide further clarity. Agree this is not in Brent's Tall Building Strategy. London Plan policy D9 for tall buildings in terms of heights applies where Boroughs have not adopted their own locally specific policy. Brent's Local Plan includes policy BD2 which identifies tall buildings as being those which are greater than 30m in height. The masterplan does not propose buildings in excess of 30m (~10 storeys) in height and is therefore compliant with D9 and BD2.</p> <p>Whilst the suggested categorisation appears reasonable, after further analysis it is considered</p>	<p><u>Text revised</u> on Section 5.4, Existing Framework, Building Heights:</p> <p>5.4.15 <u>More recent</u> New proposed developments at the end of Church Road demonstrate a gradual increase in height, though none of the proposals exceed 6 storeys (approx 18m).</p>

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				that it would be difficult to implement and would likely undermine outcomes. This is because a number of the principles do not easily fit within the proposed categories. In addition the principles could lose flexibility of application even though otherwise overall acceptable outcomes would be delivered. What's essential for one scheme may not be for another etc. They are there to provide guidance for applicants as to the Council's expectations. The Council will judge whether or not they have correctly applied each of the principles as appropriate.	
E015-27	Greater London Authority (GLA)	5.4 Building Design and Architecture Building Heights P60	Further information should be provided on which existing industrial units will be retained as existing or renovated, if so ensure an appropriate business relocation strategy is provided.	The proposed business relocation strategy was developed based on the feedback received from landowners, developers and businesses. A great proportion of land in BSSA2 and BSSA4 have not been allocated for redevelopment due to the age of the buildings, their good performance, as well as land ownership complexities. The detailed business relocation strategy can be found in section 7.4.	No change.
E015-28	Greater London Authority (GLA)	BSSA1	BSSA1 Asiatic Carpets: Design mitigations should be applied to new residential units. Consideration should be given to renovation of retained existing industrial B2/B8/E uses ie, provision of a biodiverse green roof. How will separation in movement be managed to ensure pedestrian safety. Particularly where the new East / West pedestrian route is adjacent to a dedicated industrial servicing route.	Development Principles throughout the SPD support and provide details on how to address the aspects mentioned. Site specific guidance is provided as part of the Site Allocations. More detailed comments will be provided at planning application stage. However, it is agreed that further detail can be incorporated in the SPD to secure pedestrian safety.	Add text Section 6.2 BSSA1 Design Principles: <u>Conflict of movements to be managed carefully. Pedestrian safety needs to be prioritized while ensuring a high quality and welcoming public realm.</u>
E015-29	Greater London Authority (GLA)	BSSA2	BSSA2 B&M Home Store and Cobbold Industrial Estate: Clarify how access to southern community use and workshops will be managed to ensure pedestrian safety through public realm interventions. Provision of pedestrian crossings etc. Concerns with blank frontages along public realm. Activation is key to creating better places. (architecturally rich blank frontages proposed)	Development Principles throughout the SPD support and provide details on how to address the aspects mentioned. Site specific guidance is provided as part of the Site Allocations. More detailed comments will be provided at planning application stage. However, it is agreed that further detail can be incorporated in the SPD to ensure development on the ground floor is active as well as to ensure movement conflicts can be addressed accordingly prioritising pedestrians' safety.	Text revised, Section 6.2 BSSA2, Design Principle ' Create dynamic and architecturally rich blank <u>active frontages along all pedestrian routes to maximise pedestrian's safety. When blank facades are Cobbold Road and wherever else these are unavoidable, development should drawing on</u> characterful exemplars, <u>demonstrating how safety will be upheld.</u> '

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E015-30	Greater London Authority (GLA)	BSSA4	<p>BSSA4 Chapman's and Sapcote Estate: Residential development and workspace directed towards Colin Rd and High Rd – The industrial function of Sapcote Trading Centre and Chapman's Park Industrial Estate will be protected and intensified. Consideration should be given to the provision of green open spaces to provide high quality, welcoming residential spaces. Whilst constraints are understood, a high quantum of residential development should be supported by sufficient open space. Consider the provision of pocket parks sheltered from industrial uses, roof gardens with appropriate mitigations to noise and air pollution.</p> <p>How will light industrial uses correspond to existing high street uses, considering alternative floor to ceiling heights required for these uses. Relationship to existing frontage should be considered. The massing diagram should indicate where proposed service routes and pedestrian public realm and movement will occur, including residential entrances to ensure that there will be no conflict in movement. This is key to the understanding and success of the combined uses.</p>	<p>The site is unlikely to see the delivery of public open space due to its numerous constraints. As such, general enhancements to the public realm and the provision of financial contributions for off-site provision are set out in the SPD. Private communal amenity for residents will also be provided at roof level. However, if constraints can be overcome, the Council would be supportive, and encourage the delivery of on-site open space. This can be reflected in revised wording with this part of the SPD. The frontages along Dudden Hill Lane and the High Road to be occupied by industrial uses are not adjacent to any existing commercial frontages. If this were to occur the Council would consider its cohesion with the existing context on a case by case basis.</p>	<p>Text added BSSA4 Policy Requirements:</p> <p>Green, Open and Play Spaces Due to the nature of the site, there is limited scope for introducing new green spaces. Landscaping improvements should be focussed on the adjacent stretch of High Road and tree planting and greening maximised throughout the site. <u>We will support schemes that provide pocket parks and other creative green interventions i.e. roof gardens if those can be sheltered from industrial uses and appropriate mitigations to noise and air pollution are in place.</u> Financial contributions will be required towards open space off-site and play provision.</p>
			<p>BSSA5 Willesden Bus Depot: Presume retention of existing bus depot? The Agent of Change principle would need to be applied to any redevelopment to ensure adequate protection for residents or occupiers was provided, taking into account the 24/7 nature of bus garage operations. If so, is there possible opportunity for improvements to the existing condition of the depot? ie, Inclusion of a biodiverse green roof, to improve outlook of new residents and contribute to the urban greening factor.</p> <p>Massing diagram should identify servicing routes and proposed public realm like earlier site allocations, to ensure there will be no conflicts between movement (bus and residential uses). Should liaise with TFL for any proposed changes to the bus stand.</p>		
E015-31	Greater London Authority (GLA)	BSSA5	<p>BSSA5 Willesden Bus Depot: Presume retention of existing bus depot? The Agent of Change principle would need to be applied to any redevelopment to ensure adequate protection for residents or occupiers was provided, taking into account the 24/7 nature of bus garage operations. If so, is there possible opportunity for improvements to the existing condition of the depot? ie, Inclusion of a biodiverse green roof, to improve outlook of new residents and contribute to the urban greening factor.</p> <p>Massing diagram should identify servicing routes and proposed public realm like earlier site allocations, to ensure there will be no conflicts between movement (bus and residential uses). Should liaise with TFL for any proposed changes to the bus stand.</p>	<p>The bus depot function will remain and there are no plans for this role to change. Opportunities for improvements have been considered, hence the option shows consolidation of the bus depot's offices to the new development facing the High Road. The proposed scheme has received support from the landowners and engagement with them will continue to occur to keep proposals and views on potential development up to date. The agent of change requirement is covered by principle ACC1 in accordance with policies D13 and E7.</p> <p>For now, there are no opportunities to increase greening or public realm routes throughout the site due to its operational needs.</p>	No change.

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E015-32	Greater London Authority (GLA)	BSSA8	BSSA8 McGovern's Yard: Should create active frontages along the High Rd and proposed public realm. The co-location of uses should respond to historical assets and existing residential terraces, providing appropriate yard space for servicing needs, welcoming residential entrances and high-quality residential units.	Design principles on p91 already addressed the points noted.	No change.
E015-33	Greater London Authority (GLA)	Appendices	Suggested additional London Plan guidance to add to Appendix D –Industrial Intensification and Co-location Study. Characterisation and Growth Strategy LPF, Optimising Site Capacity: A Design Led Approach LPG and Housing LPG.	Agreed, these references within Appendix G of the SPD would be helpful.	Add guidance suggested to Appendix G Additional Guidance.
E016-1	The Coal Authority	General	As you are aware, Brent Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on this consultation.	Comment noted.	No change.
E017-1	Canal River Trust	General	I can confirm that the Canal & River Trust have no comments to make as the area is well away from the Grand Union Canal or Welsh Harp/Brent Reservoir and Brent Feeder. Please feel free to contact me if you have any further queries.	Comment noted.	No change.
E018-1	Thames Water	General	We support the flooding and water management policies set out in Section 5.5 and welcome the reference to engagement with the water utility provider at an early stage to discuss water and wastewater capacity.	We welcome the support.	No change.
E018-2	Thames Water	General	In relation to the water efficiency requirements set out in FW3, it should be noted that planning conditions are required to be attached to any planning approval requiring the 105l/p/d optional water efficiency standard to be required through Building Regulations. If it is intended to rely on the Building Regulations to deliver the water efficiency standard in line with Policy S15 of the London Plan, then planning conditions requiring the optional requirement to be delivered will need to be attached to any planning permissions for new residential development.	It is accepted that the SPD would benefit from amendment to FW3 to refer to implementation being secured via condition.	<u>Text added</u> , Section 5.5 Development Principles: FW3 Consumption: Achieve the target for mains water consumption of 105 litres or less per person per day and be supported by a Water Efficiency Assessment. <u>This is required to be secured via condition. To achieve this, developments</u> should incorporate water management methods such as smart metering, water-saving and greywater recycling.

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					(Local Plan policy BSUI4).
E019-1	Brent Cycling Campaign	Vision	The vision is promising as demonstrated by the illustration on page 5, which was also used when this plan was presented to the cabinet in a meeting on the 12th of September 2022. But we fear the lack of details may not lead the Master Plan to achieve this vision.	The SPD can be amended to provide the details requested to support the delivery of the vision.	Please see updates following TfL comment E07 onwards.
E019-2	Brent Cycling Campaign	5.2 Movement and Connectivity	The Key transport section is 5.2: Movement and Connectivity, from page 36 (in the document, as opposed to PDF page numbering). We welcome the ambition and active travel principles as detailed in this section. It is also encouraging to read that the barriers to cycling have been accurately acknowledged (i.e, severance lines, mostly non-existing provision and below-standard existing provision). However, we regret that this document does not include one single mention of Disabled cyclists.	Comment noted. We acknowledge the importance of designing the cycle infrastructure to support inclusive cycling.	Development Principle added within Section 5.2 Movement and Connectivity: <i>ST 6 <u>Inclusive cycling: Cycle infrastructure needs to support people with physical or mental disabilities, new cyclists, the elderly, injury rehabilitation referrals and those lacking the confidence to take a bicycle out on the road.</u></i> Amendments to the section were made to ensure the text is concise and fits within the allocated section.
E019-3	Brent Cycling Campaign		On page 37, in the hierarchy “Local Street” there’s a picture of a low-traffic neighbourhood (LTN) but there is no mention in the text. On page 37, in the street hierarchy “Cycle Path min 2m” is mentioned in the ‘Strategic Connectors’, but it is not clear whether this is single, or bi-directional.	Comment noted. Images on Section 5.2 Movement and Connectivity, Proposed framework are for illustrative purposes.	Please see updates following TfL comment E07-5 onwards. Observation has been added to highlight images and sections are for illustrative purposes.
E019-4	Brent Cycling Campaign		On page 39, in “Proposed interventions” we have “protected cycle facilities” and “cycle lane and facilities” listed separately. Details are needed, or more specific wording. The level of protection should be determined by the speed of motor vehicles and vehicles per hour as well as the nature of that particular street/road. Paint does not count, nor does an Advanced Stop Line. On the same page, there doesn’t seem to be an overlap	More clarity will be provided through amendments to the SPD on proposed interventions as well as in the indication of the LTNs in a diagram on Section 5.2 Proposed Interventions.	Figure 30 to indicate location of LTNs. Key and text revised to ensure numbering corresponds with key. Private roads have been removed from Figure 30 as improvements will take place as part of site allocations redevelopment.

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			<p>between junction improvement and cycleway improvements. Junctions are crucial to enable cycling and to deliver on the active travel principles listed on page 41. We need clarifications as to what treatment on junctions will be proposed.</p> <p>On page 39 “Low Traffic Neighbourhood Cells” are indicated, but neither marked on the map nor is the infrastructure proposed (restrictions) to achieve this.</p>		
E019-5	Brent Cycling Campaign		<p>On page 40, Option 1 suggests a low-traffic neighbourhood (LTN) or bus gate type of intervention without stipulating that cycles will be allowed. Option 2 is very unclear, as it implies that this will close Church Road to through motor traffic completely. Throughout this document, there is no mention of the current national walking and cycling guidance (LTN 1/20) or LCDS. It is neither in the body of the plan or listed in the additional guidance, and this is rather worrying.</p>	<p>This is accepted. The SPD can be amended to provide greater clarity on the proposed interventions for cyclists in Option 1, which Option 2 will reflect. In addition AT4 can make appropriate reference to cycling provision as set out in Local Transport Notes and London Cycling Design Standards.</p>	<p>Text added:</p> <p>Option 1 - Create a low-traffic environment on Church Road: The proposal would restrict through traffic along Church Road between Ilex Road and Roundwood Road. Only London buses <u>and cyclists</u> could travel through this section. Daytime servicing and loading for local businesses would be restricted to early morning and from early evening. Bus stops would be relocated to each end of Church Road.</p> <p>Option 2 – <u>Building upon option 1, R</u> <u>recreate</u> the historic alignment of Church Road: The two green spaces would be joined to form a public square whilst businesses at the western end of the high street would retain access to servicing and loading facilities.</p> <p>ST4 Cycling: Developers should support the creation of new east-west and north-south cycle routes across CEGA. High quality cycle parking and storage to be provided on the routes as well as within buildings. (Local Plan policy BT1, <u>Local Transport Note (LTN) and London Cycling Design Standards (LCDS)</u>)</p>

REP #	CONSULTEE	DRAFT SPD CHAPTER, SECTION OR PARAGRAPH	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
F01	Not identified	General	Replace Citizens Advice. B+M Bargains caters to people on low incomes. Retain small scale retail.	Citizens Advice is an independent organisation. The Council has no influence in the activities provided or the location where they take place.	No changes.
				We acknowledge the importance of B+M Bargains locally. However, the site is under private ownership. The masterplan SPD provides guidance on future developments and support existing businesses to stay local while redevelopment takes place but it cannot be prescriptive regarding which businesses should remain on site.	
				The masterplan identifies a number of opportunities for new retail to take place supporting an active and thriving area.	
F02	Not identified	Parking	More consideration for parking for religious institutions. Parking for elderly and disabled.	<p>Reducing traffic congestion and CO2 emissions is a key priority. So new developments within the CEGA are proposed to be car-free or car-lite, supported by provision for share mobility which could include car clubs.</p> <p>3% parking provision for disabled residents required, and need to demonstrate capacity for 10% total future provision - policy T6</p> <p>Nevertheless, we understand the need for new development to provide parking to access communities facilities and for people with disabilities, to ensure we create an inclusive community and the plan will address that. Therefore the SPD will be amended with an additional objective TM4: Inclusive Parking.</p>	Section 5.2 Traffic Management Development Principles: add <u>TM4 Inclusive parking: Disabled parking needs to be secured in new developments and to access community facilities. Please also refer to London Plan parking standards.</u>
F03	Not identified	General	Supportive of the plan.	We welcome the support.	No change.
		Crime	Supportive of the Challenges but asked for more recognition on the crime aspect.	Crime is recognised and highlighted on page 24 of the draft masterplan SPD as one of the area's key challenges.	
		Affordable Workspaces	Supportive of the opportunities but asked for more affordable workspaces, spaces for crafts	Affordable workspaces are highlighted as a result of the early consultation activities and they have been incorporated	

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			and arts, spaces that reflect the cultural ethnicity of the area. No betting shops.	throughout the plan, supporting planning police BE1, BE2 and BE3. Affordable workspaces secured via S106 agreements are required to comply with management plans. These can help ensure the spaces are supporting the local ethnicity and needs of the area.	
F04	Resident 5	Green Spaces Design Quality Safety	<p>Not enough green spaces, buildings are too tall, not enough affordable housing.</p> <p>Representation enquiry whether there are enough lighting/windows new developments and how many jobs will be delivered.</p> <p>Safety is a big issue near Neasden and Dollis Hill station.</p>	<p>The masterplan SPD seeks to strike a balance between green spaces and building heights. CEGA is within an open space deficiency area and so provision of green spaces are one of the area's top priorities. Nevertheless, in order to provide the needed green space provision, enough development is needed to help fund the spaces. Building heights are within the limit as the area sits outside Brent's Building Strategy.</p> <p>Affordable housing follows London Plan guidance with a strategic target of 50% and minimum target of 35% affordable housing.</p> <p>All new developments need to comply with Brent's Design Guide SPD and ensure a good level of daylight, sunlight and outlook across all windows.</p> <p>The masterplan SPD indicates improvements within the route connecting Dollis Hill Station to Dudden Hill Lane.P40.</p>	No change.
F05	Not identified	Crime and Safety Infrastructure Safety CNWL Supermarket Libraries	<p>Supportive of the vision, values and objectives.</p> <p>Supportive of the Challenges but asked for more emphasis on crime and safety and community cohesion.</p> <p>Have raised queries about the infrastructure: can it cope? Comment emphasized parking issues and questioned the relationship between parking, cycling. It also queried what is the infrastructure for electric cars.</p> <p>Street lighting by Dollis Hill is a priority for safety reasons.</p> <p>Requested an update on the CNWL situation.</p>	<p>We welcome the support.</p> <p>Crime and community cohesion are both recognised and highlighted in the masterplan SPD as one of the area's key challenges. The proposed plan was developed to help tackle that by supporting developments that bring positive contributions to the area, such as green spaces, active frontages and new businesses and job opportunities.</p> <p>A number of improvements are planned for the area to ensure the infrastructure can cope with the growing population. This includes improvements to existing streets, increased provision of cycle infrastructure, new green and community spaces.</p> <p>The masterplan SPD indicates improvements within the route connecting Dollis Hill Station to Dudden Hill Lane.P40.</p>	No changes.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
Page 245			<p>Question about what is being offered for entertainment?</p> <p>Highlighted the need for a supermarket.</p> <p>Libraries should be used more for learning and educational purposes.</p>	<p>The Council is working with the College and their partners with a view to redeveloping the existing campuses predominantly for residential whilst a new campus is built at Wembley Park. All these sites are subject to site allocations in the Local Plan, whilst the Dollis Hill campus is addressed in the Neasden Stations Growth Area SPD.</p> <p>The SPD area is located between Church End and Willesden Green town centres, and in proximity to Neasden and Harlesden town centres. Entertainment type uses are to be directed towards town centres in the first instance. This will support their on-going vitality and vibrance. If such uses are spread too thinly throughout an area, then they generally lack viability. As such the SPD prioritises the provision of new jobs and homes, community space and open space, as opposed to entertainment type uses which already exist in town centre areas. The masterplan SPD acknowledges locations for music development, building on the existing local background. By doing this we plan to create an environment where creativity and entertainment can be developed locally.</p> <p>The masterplan SPD identifies a number of opportunities for new redevelopment and new retail floorspace but makes no specific recommendations for a new supermarket. Proposals for any new supermarket in the CEGA would be considered within the context of any impacts on the vitality and viability of nearby town centres. Lidl has previously expressed interest in providing a new supermarket as part of redevelopment in the CEGA but no proposals are confirmed.</p> <p>There are no libraries located within the CEGA boundary. The closest is located by Willesden Green.</p>	
	F06	Cleanliness	Requested challenges to emphasise cleanliness and on-going spitting issues.	This is accepted and the masterplan SPD challenges will add reference to the appearance of the area.	<p><u>Add text</u> Section 3.2 Challenges:</p> <p><u>3.2.8 Overall state of the area: Church End has suffered from lack of investment for decades. Cleanliness is a recurrent issue of the area.</u></p>

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
F07	Resident 7	High Streets and Active Frontages	Supportive of the proposed plan. Raised questions about how the Council is planning to support active frontages and local highstreets to be more inclusive and diverse.	We welcome the support. In all site allocations, design principles support developments with active frontages which overlook public spaces to ensure we can maximise the area's safety. Although the composition of the town centres uses/occupiers are largely outside of the Council's control, we can ensure that proposals for new retail floorspace are inclusive and accessible in design terms, allowing for disabled access. We do however try and limit the quantity of potentially harmful uses, such as take-aways, betting shops, amusement centres, and payday loan shops which will allow for other, more desirable uses to proliferate.	No change.
F08	Resident 8	Anti-social Behaviour Community Centres	Supportive of the plan. Asked to include as part of the challenges more emphasis on anti-social behaviour and drugs. Questioned where the community centres and activities for local people are. Comment also supportive of the improvements in Church Road and the Street Market.	We welcome the support. Crime and deprivation have been highlighted as part of section 3.2 Community Centres: The masterplan SPD details Site Allocation policy requirements for new development to provide three (3) new community spaces and re-provide one (1) new public house as follows: BSSA1 (Asiatic Carpets) - 1x community space recommended to be linked to the existing arts and film production, for training and employment for young people, approx. 900sqm. BSSA2 (B&M Home Store & Cobbold Industrial Estate) - 1x health facility - subject to local demand and agreement with the ICS- approx. 1,855m2 - 1x Brent Enterprise Hub: approx. 900sqm BSSA5 (Willesden Bus Depot) - 1x Public House re-provision. approx. 480sqm Activities for those spaces will be developed via further engagement with the community.	No change.
F09	Resident 9	Housing Green spaces	Supportive of the plan. Agreed with the challenges that are faced and believe it will help bring wealth to the area. Would like to see more housing and green areas.	We welcome the support. The masterplan SPD seeks to strike a balance between green spaces and building heights. CEGA is within an open space deficiency area and so provision of green spaces are one of the area's top priorities. Nevertheless, in order to provide the needed	No change.

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				green space provision, enough development is needed to help fund the spaces.	
F010	Resident 10	Heritage	Supportive of the plans but enquired the Heritage section. More emphasis could be given to this section. Different communities are/will be moving here, and it is important to keep history of the area alive.	The masterplan has a dedicated section discussing heritage within the area on p 57.58. Development Principle H1 Heritage identifies the need for prioritise restoration and retention of architectural features in case of redevelopment.	No change.
F011	Resident 11	Spaces and Activities for Young People Cleaning Green Spaces	Enquiry about infrastructure and activities for young people. Highlighted the need for cleaner roads and more green spaces.	Engagement with young people has helped to inform the infrastructure proposed for the area. This process identified and highlighted the need for investing in space training and providing opportunities for young people. The masterplan SPD indicates development options for key sites in Church End. To accommodate the feedback received from young people the masterplan SPD supports the delivery of following: BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people. BSSA2 B&M Home Store and Cobbold Industrial Estate: 1x rooftop sports pitch focused on young people. BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment. Finally, on Section 7.1. Community Involvement it is stated that developers should seek to co-design new developments with young people.	No change.
F012	Resident 12	Re-using Buildings	Supportive of the plan. Enquired about the approach for re-using existing buildings rather than building new ones.	The masterplan SPD aims to support the delivery of a characterful place that celebrates local landmarks and heritage. A dedicated section under Building Design and Architecture can be found on section 5.4 providing an overview of the area's current heritage features.	No change.

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				<p>Development Principle H1 Heritage states that we seek to restore and retain architectural features of merit and to seek influence from the positive aspects of existing heritage assets. A map of the existing heritage assets is stated on Figure 52.</p> <p>Heritage features within development sites have been considered for retention. However, some heritage features within site allocations couldn't be retained due to pre-identified issues i.e. asbestos.</p>	
F013	Resident 13	Safety Housing Green Spaces	<p>Supportive of the plan.</p> <p>Highlighted the need for having spaces for walking as well allowing to cross roads safely.</p> <p>Requested more housing and green spaces.</p>	<p>We welcome the support.</p> <p>Crossings: On section 5.2 Movement and Connectivity, a number of proposed interventions are demonstrated on figure 30. There are 11 interventions proposed that focus on improving and creating crossings to ensure the area safer to walk.</p> <p>Housing: The masterplan SPD supports the delivery of at least 1,300 new high-quality homes co-located with industrial uses, by meeting or exceeding the identified site specific indicative residential capacity set out in Figure 11.</p> <p>Green Spaces: The masterplan SPD details Site Allocation policy requirements for new development to provide six new green spaces, plus, two pocket parks, totalling approximately 9,500m² of additional green space as follows:</p> <p>BSSA1 (Asiatic Carpets): Residential Garden: 2000sqm BSSA1 (Asiatic Carpets): Creative Square: 2000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Linear Open Space: approx. 1000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Rooftop Sport: approx. 1000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Rooftop Amenity: approx. 500sqm BSSA3 (Church End Local Centre): Market Square: approx. 2000sqm Denzil Road Pocket Park: approx. 500sqm Conley Road Pocket Park: approx. 500sqm</p>	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				The masterplan SPD also identifies the need for improvements to existing open spaces.	
F014	Resident 14	Play	Supportive of the plan. Enquired about play spaces provision.	Figure 45 provides an overview of the local open space network within a 5, 15 and 25 minute walk from the centre of CEGA. Within CEGA's inner boundary, the cemetery and church yard offer limited opportunities for recreation such as sports and play. On Section 5.3 Green and Open Spaces, Development Principle PLR1- PLR5 support the provision of high-quality, inclusive save play interventions across all CEGA boundary. An indication of where future play facilities will take place can be found on figure 34.	No change.
F015	Resident 15	Community Spaces Spaces for Young People Green Spaces	Supportive of the plan as long as it is environmentally sustainable. Highlighted the lack of sports/community spaces, spaces for youth. Asked for more opportunity for youth, more facilities for young people youth clubs. Supportive that green spaces are being created.	A dedicated section for Climate Change and Sustainability (Section 5.5) reinforces the Council's commitment to ensure new developments can comply with the highest sustainability standards. The section includes further and detailed development principles on Resilient, Efficient and Healthy developments, Air quality and Pollution, Agent of Change and Contamination, Waste, Flooding and Water Management.	No change.
F016	Resident 16	General	Supportive of the plan. No further comments.	We welcome the support.	No change.
F017	Resident 17	Re-using buildings Parking	Supportive of the plan. Suggested more consideration for older buildings in this area. Enquired about how the Council will be managing parking.	We welcome the support. The masterplan SPD aims to support the delivery of a characterful place that celebrates local landmarks and heritage. A dedicated section under Building Design and Architecture can be found on section 5.4 providing an overview of the area's current heritage features. Development Principle H1 Heritage states that we seek to restore and retain architectural features of merit and to seek influence from the positive aspects of existing heritage assets. A map of the existing heritage assets is stated on Figure 52.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				<p>Heritage features within development sites have been considered for retention. However, some heritage features within site allocations couldn't be retained due to pre-identified issues i.e. asbestos.</p> <p>Parking standards for developments will follow the standards set out in the London Plan. On street parking provision will need to support relevant mayoral and Brent policy including Long Term Transport Strategy, Air Quality Management Plan and Climate & Ecological Emergency Strategy and associated guidance. Management of on-street parking will be undertaken according to Brent's Parking Policy.</p>	
F018 Page 250	Resident 18	Housing Green Spaces Cultural and Community Spaces	<p>Commented that the plan seems to have more housing than community and green spaces.</p> <p>Highlighted the lack of cultural and community spaces as well as music venues.</p> <p>Asked for the proposed changes to support the cultural makeup of Willesden and Harlesden.</p>	<p>Housing: The masterplan SPD supports the delivery of at least 1,300 new high quality homes co-located with industrial uses, by meeting or exceeding the identified site specific indicative residential capacity set out in Figure 11.</p> <p>Green Spaces: The masterplan SPD details Site Allocation policy requirements for new development to provide six new green spaces, plus, two pocket parks, totalling approximately 9,500m² of additional green space as follows:</p> <p>BSSA1 (Asiatic Carpets): Residential Garden: 2000sqm BSSA1 (Asiatic Carpets): Creative Square: 2000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Linear Open Space: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Sport: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Amenity: approx. 500sqm BSSA3 (Church End Local Centre): Market Square: approx. 2000sqm Denzil Road Pocket Park: approx. 500sqm Conley Road Pocket Park: approx. 500sqm</p> <p>The masterplan SPD also identifies the need for improvements to existing open spaces.</p>	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
Page 251				<p>Cultural and Community Spaces: The masterplan SPD indicates development options for key sites in Church End. And to accommodate the feedback we have received from young people the masterplan SPD supports the delivery of following:</p> <p>BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people.</p> <p>BSSA2 B&M Home Store and Cobbold Industrial Estate: 1x rooftop sports pitch focused on young people.</p> <p>BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment.</p> <p>Apart from that, the masterplan SPD details Site Allocation policy requirements for new development to provide:</p> <p>BSSA2 (B&M Home Store & Cobbold Industrial Estate)</p> <ul style="list-style-type: none"> - 1x health facility - subject to local demand and agreement with the ICS - approx. 1,855m2 - 1x Brent Enterprise Hub: approx. 900sqm <p>BSSA5 (Willesden Bus Depot)</p> <ul style="list-style-type: none"> - 1x Public House re-provision. approx. 480sqm 	
	F019 Resident 19	<p>Play Spaces</p> <p>Community Events</p>	<p>Supportive of the plan.</p> <p>Asked for more spaces for children and community events.</p>	<p>We welcome the support.</p> <p>Figure 45 provides an overview of the local open space network within a 5, 15 and 25 minute walk from the centre of CEGA. Within CEGA's inner boundary, the cemetery and church yard offer limited opportunities for recreation such as sports and play.</p> <p>On Section 5.3 Green and Open Spaces, Development Principle PLR1- PLR5 support the provision of high-quality, inclusive save play interventions across all CEGA boundary. An indication of where future play facilities will take place can be found on figure 34.</p>	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				The masterplan SPD a number of new open spaces, which are also demonstrated on figure 34. However, it is not within the masterplan SPD's scope to plan or deliver community events.	
F020	Resident 20	General	Supportive of the plan.	We welcome the support.	No change.
F021	Resident 21	General	Supportive of the plan.	We welcome the support.	No change.
F022	Resident 22	General	Supportive of the plan.	We welcome the support.	No change.
F023	Resident 23	General	Supportive of the plan.	We welcome the support.	No change.
F024	Resident 24	Cleaning Young People Support	Supportive of the plan. Asked for cleaner streets and more training opportunities for young people.	We welcome the support. The masterplan SPD development principles have been developed to ensure the higher standards of public realm are delivered throughout CEGA. Development principle OGS4 outlines maintenance plans for long-term management and maintenance to ensure spaces are well-used and remain high quality over time. Developers should engage the community in the design of spaces to promote a sense of ownership, respect and responsibility. (Local Plan policy BG11). However, cleaning regimes for the area are beyond the remit of this SPD. The masterplan SPD indicates development options for key sites in Church End. And to accommodate the feedback we have received from young people the masterplan SPD supports the delivery of following: BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people. BSSA2 B&M Home Store and Cobbold Industrial Estate: 1x rooftop sports pitch focused on young people. BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				On Section 5.3 Green and Open Spaces, Development Principle PLR1- PLR5 support the provision of high-quality, inclusive save play interventions across all CEGA boundary. An indication of where future play facilities will take place can be found on figure 34.	
F025	Resident 25	General	Supportive of the plan.	We welcome the support.	No change.
F026	Resident 26	General	Supportive of the plan.	We welcome the support.	No change.
F027	Resident 27	General	Supportive of the plan.	We welcome the support.	No change.
F028	Resident 28	General	Supportive of the plan.	We welcome the support.	No change.
F029	Resident 29	New Homes	Supportive of the plan.	We welcome the support.	No change.
		Cleanliness	Asked for new homes to benefit local people first.	The masterplan SPD supports the need for housing by supporting the delivery of 1300 new homes. The target is for a minimum of 35%, and when viable 50%, of new homes to be new affordable homes.	
		Greening	Also highlighted more bins, cleaning, less street noise, more trees and play facilities.	New green and play provision are highlighted on p. 40.	
		Supermarket	Supermarket is needed.	Development principle OGS4 outlines maintenance plans for long-term management and maintenance to ensure spaces are well-used and remain high quality over time. Developers should engage the community in the design of spaces to promote a sense of ownership, respect and responsibility. (Local Plan policy BG11). However, cleaning regimes for the area are beyond the remit of this SPD. The masterplan SPD identifies a number of opportunities for new redevelopment and new retail floorspace, but makes no specific recommendations for a new supermarket. Proposals for any new supermarket in the CEGA would be considered within the context of any impacts on the vitality and viability of nearby town centres. Lidl has previously expressed interest in providing a new supermarket as part of redevelopment in the CEGA but no proposals are confirmed.	

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
F030	Resident 30	General	Supportive of the plan.	We welcome the support.	No change.
F031	Resident 31	General	Supportive of the plan.	We welcome the support.	No change.
F032	Resident 32	Employment Activities for Children	Supportive of the plan. Asked for more employment, children's activities.	We welcome the support. Brent Local Plan policy is to deliver economic growth and employment opportunities for all. Church End contains Locally Significant Industrial Sites (LSIS) and Local Employment Sites (LES) designated to intensify industrial uses through co-location with residential uses. Redevelopment will be expected to improve the quality of industrial stock in the area, with the provision of modern light industrial facilities. The draft CEGA Masterplan SPD shows how all Site Allocations can increase the amount of employment floorspace, except BSSA1 (Asiatic Carpets) where the LES part of the Site Allocation designated for mixed use redevelopment since 2010 retains industrial floorspace, but at a lower amount. The masterplan SPD development principles have been developed to ensure the higher standards of public realm are delivered throughout CEGA and new play facilities are highlighted on p.40.	No change.
F033	Resident 33	Health and Wellbeing Public Toilets	Emphasised the need for supporting local people health and wellbeing. Public toilets are needed. Issues with safety, drugs, waste management, bad smell need to be addressed.	The North West London Integrated Care System (ICS) was consulted in the development of the draft CEGA Masterplan SPD. The ICS stated by May 2021 that there is no current predicted need for an additional health hub/facility within the CEGA boundary. Still, the masterplan SPD also designates Site Allocation BSSA2 (B&M Home Store & Cobbold Industrial Estate) for redevelopment and provision of a health facility (approximately 1,855m ²) should local needs and demand change, and subject to agreement with the ICS. A review of local health needs with the ICS is expected to take place every 5 years. The masterplan SPD vision's is to create a an attractive, prosperous and resilient neighbourhood that values and respects existing communities, whilst proactively planning for and welcoming a growing population and future business and employment needs.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				<p>Development proposals have been developed to ensure the area is well lit, overlooked, safe and with high quality places for local people.</p> <p>Community Spaces across CEGA will provide an opportunity for providing accessible public for the community.</p>	
F034	Resident 34	Waste	Rubbish and cleaning need to be addressed.	The masterplan SPD provides the framework for creating an attractive and welcoming neighbourhood. Specific issues with rubbish and cleaning fall outside the Masterplan SPD's scope. Comments on the area's cleanliness have been shared with the cleansing services part of the Council.	No change.
F035	Resident 35	Quality of the Environment High Street Uses Housing Tenure	<p>Church Road has gone down in the past 25 years. Uses not benefiting the community are compromising the area's quality. The area is dirty and needs improvement.</p> <p>Brent Council needs to have more control on the high street uses approved, too much of the same: betting shops, food etc.</p> <p>There area has no family homes, and many houses are being tuned into HMOs which compromises the infrastructure.</p>	<p>The masterplan SPD supports the delivery of an attractive, prosperous and resilient neighbourhood that values and respects existing communities, whilst proactively planning for and welcoming a growing population and future business and employment needs. This holistic plan seeks to attract investment and the revival of the Church End area.</p> <p>The existing high street offer contributes to the sense of belonging of many communities, but it could also better meet wider local need. The masterplan SPD suggests that spaces for young people art and local enterprise are encouraged as part of high street redevelopment.</p> <p>The Council seeks to guard against the over-proliferation of potential harmful uses such as betting shops, and takeaways. This is managed through policy BES of the local plan and considers their representation within the centre as a whole, and their location in relation to existing similar uses, and schools among other things. It is not necessary to include this explicitly within the SPD itself.</p>	No change.
F036	Resident 36	Community Cohesion Green Spaces Safety and ASB	<p>Comment would like to see Church End with a nice community with more green spaces.</p> <p>Drug issues can make the area unsafe.</p>	Figure 45 provides an overview of the local open space network within a 5, 15 and 25 minute walk from the centre of CEGA. Within CEGA's inner boundary, the cemetery and church yard offer limited opportunities for recreation such as sports and play.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
Page 256		Activities for Children and the Community	Ask for more activities for children and the community.	<p>On Section 5.3 Green and Open Spaces, Development Principle PLR1- PLR5 support the provision of high-quality, inclusive save play interventions across all CEGA boundary. An indication of where future play facilities will take place can be found on figure 34.</p> <p>The masterplan SPD a number of new open spaces, which are also demonstrated on figure 34. However it is not within the masterplan SPD's scope to plan or deliver community events.</p> <p>Development principle OGS3 Safety states that new developments will create safe spaces and secure access by designing out crime, and by providing well-lit and overlooked spaces, adjacent uses that provide activation. (Local Plan policy BG11)</p> <p>On Section 5.3 Green and Open Spaces, Development Principle PLR1- PLR5 support the provision of high-quality, inclusive save play interventions across all CEGA boundary. An indication of where future play facilities will take place can be found on figure 34.</p> <p>The masterplan SPD a number of new play spaces, which are also demonstrated on figure 34.</p>	
	F037 Resident 37	Health and Wellbeing	<p>Supportive of the plan.</p> <p>Health and wellbeing are priorities.</p>	<p>We welcome the support.</p> <p>The North West London Integrated Care System (ICS) was consulted as officers developed the draft CEGA Masterplan SPD. The ICS stated by May 2021 that current predictions indicate there is no need for an additional health hub/facility within the CEGA boundary. Still, the masterplan SPD also designates Site Allocation BSSA2 (B&M Home Store & Cobbold Industrial Estate) for redevelopment and provision of a health facility (approximately 1,855m²) should local needs and demand change, and subject to agreement with the ICS. A review of local health needs with the ICS is expected to take place every 5 years.</p> <p>The masterplan SPD also designates Site Allocation BSSA2 (B&M Home Store & Cobbold Industrial Estate) for redevelopment and provision of a health facility (approximately 1,855m²) should local needs and demand change, and subject to agreement with the</p>	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				ICS. A review of local health needs with the ICS is expected to take place every 5 years.	
F038	Resident 38	Play Spaces	Supportive of the plan. Asked for more play areas for children and more events for the community.	We welcome the review. On Section 5.3 Green and Open Spaces, Development Principle PLR1- PLR5 support the provision of high-quality, inclusive save play interventions across all CEGA boundary. An indication of where future play facilities will take place can be found on figure 34. The masterplan SPD a number of new play spaces, which are also demonstrated on figure 34.	No change.
F039	Resident 39	General	Supportive of the plan.	We welcome the support.	No change.
F040	Resident 40	General	Supportive of the plan.	We welcome the support.	No change.
F041	Resident 41	Schools	Supportive of the plan. Highlighted the need for more schools.	We welcome the support. Schools: Brent's latest School Place Planning Strategy 2019-2023 (November 2022 refresh) indicates that Brent will continue to have a high number of spare places across the primary system at a borough level. Brent 2022 school planning forecasts also confirm sufficient secondary school places to meet demand up to 2028/29 in all year groups. North Brent Secondary School is under construction in Neasden Lane. Further details on Brent's School Place Planning Strategy .	No change.
F042	Resident 42	Spaces and Support for Young People	Supportive of the plan. Highlighted the need for having more spaces dedicated to support young people.	We welcome the support. The masterplan SPD indicates development options for key sites in Church End. And to accommodate the feedback we have received from young people the masterplan SPD supports the delivery of following:	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				<p>BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people.</p> <p>BSSA2 B&M Home Store and Cobbold Industrial Estate: 1x rooftop sports pitch focused on young people.</p> <p>BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment.</p>	
F043	Resident 43	Housing Shopping Offer	<p>Supportive of the plan.</p> <p>Highlighted the need for more homes and better-quality shops as well as a supermarket.</p>	<p>We welcome the support.</p> <p>By 2041 CEGA will deliver at least 1,300 new homes co-located alongside new and refurbished industrial premises. The masterplan will facilitate the delivery of high-quality homes, more business opportunities and jobs, all supported by new infrastructure. Business growth will develop the area's emerging sectors, which includes film and music production, and support the transition to a net zero carbon circular economy.</p> <p>Where retail floorspace is provided it will be of a high quality meeting modern standards. Outside of controlling the appropriate uses of the shops, the Council does not have any control over which private business occupies the new units.</p>	No change.
F044	Resident 44	Housing Homelessness	Highlighted the need for new council homes to help address homelessness challenges.	The masterplan SPD supports the need for housing by supporting the delivery of 1300 new homes. The target is for a minimum of 35%, and when viable 50%, of new homes to be new affordable homes.	No change.
F045	Resident 45	General	Supportive of the plan.	We welcome the support.	No change.
F046	Liberty to British People	Shopping Offer	The area is not a good place to live and shop. There is a need for a quality shopping area and better food offer.	Noted. The masterplan includes within its boundary Church End town centre, and is adjacent to the nearby centres of Neasden and Willesden Green. The SPD seeks to provide conditions which will help to improve these town centres, but does not seek to replace them. This will be through increasing the number of local residents, helping to increase footfall in the existing centres, as well as bringing investment to the area to improve the public	No change.

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				realm which will make the centres a more enticing place to spend time and shop, in turn increasing the vitality and viability of the local centres.	
F047	Resident 46	General	Supportive of the plan.	We welcome the support.	No change.
F048	Resident 47	Waste	Rubbish collection needs improvement and green streets need to be prioritised.	<p>Waste collection: Development principle W3 Storage indicates that new developments need to adhere to a Site Waste Management Plan and Operation Waste Management Plan. (London Plan policy D6 and SI7). This ensures that on-site waste is effectively managed. Development Plan policies also require that both construction and household waste is reduced. The Council, through partnership with neighbouring boroughs, has produced the West London Waste Plan. This seeks to ensure the future capacity of waste sites is sufficient to meet future demand given population growth and changing trends. This includes the safeguard of existing waste sites, and their increased capacity. This is in an effort to ensure that London is self-sufficient, and can meet all of its waste needs in accordance with London Plan policy SI8.</p> <p>The masterplan SPD does not have any influence on current waste collection processes.</p>	No change.
F049	Resident 48	General	Supportive of the plan.	We welcome the support.	No change.
F050	Resident 49	General	Supportive of the plan.	We welcome the support.	No change.
F051	Resident 50	Safety	Highlighted the need for more police patrols on Church Road after 6pm and the need for more local shops and green groceries as well as safer open spaces.	<p>Comment noted. Whilst the SPD seeks to improve the area in terms of safety, crime prevention, fly-tipping and public realm improvements, by setting out principles that will help to better the area, it alone cannot resolve cleanliness and social behavioural issues.</p> <p>London Plan policy D11, in addition to other design-related policies, seeks to design out crime. This includes reference to the Secured by Design scheme published by the police. This includes design measures which reduce the likelihood of crime, such as ensuring passive surveillance and street lighting which help guard against anti-social behaviour.</p>	No change.

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				To bring extra consideration to the topics mentioned, further text will be added. Please see E05-3.	
F052	Resident 51	Support for Young People	Supportive of the plan. Highlighted the need for facilities to support young people.	We welcome the support. The masterplan SPD indicates development options for key sites in Church End. And to accommodate the feedback we have received from young people the masterplan SPD supports the delivery of following: BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people. BSSA2 B&M Home Store and Cobbold Industrial Estate: 1x rooftop sports pitch focused on young people. BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment.	No change.
F053	Resident 52	General	Supportive of the plan.	We welcome the support.	No change.
F054	Resident 53	Supermarket	Supportive of the plan. Supportive of the local market.	We welcome the support. Where retail floorspace is provided it will be of a high quality meeting modern standards. Outside of controlling the appropriate uses of the shops, the Council does not have any control over which private business occupies the new units.	No change.
F055	Resident 54	Schools Play and Activities for Children and Adults	Supportive of the plan. Indicated need for high schools, parks, facilities for young children, sports for adult and children.	We welcome the support. Brent Council has a statutory duty to ensure there are sufficient school places for Brent children. Brent's latest School Place Planning Strategy 2019-2023 (November 2022 refresh) indicates Brent will continue to have a high number of spare places across the primary system at a borough level. CEGA is located within Primary Planning Area 4 which is forecast to have high levels of spare places to 2027. Brent 2022 school planning forecasts also confirm sufficient secondary school places to meet demand up to 2028/29 in all year	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				<p>groups. North Brent Secondary School is under construction on Local Plan CEGA Site Allocation BSSA19 Chancel House, Neasden Lane, which will provide 900 secondary schools places when completed in 2023.</p> <p>Growth Areas, including CEGA, where there are a number of new housing developments are kept under close review. Further details on Brent's School Place Planning Strategy are available here: https://democracy.brent.gov.uk/documents/s127138/12a.%20Appendix%201%20-%20School%20Place%20Planning%20Strategy%20Refresh.pdf</p> <p>The masterplan SPD details Site Allocation policy requirements for new development to provide six (6) new green spaces, plus, two (2) pocket parks, totalling approximately 9,500m² of additional green space as follows:</p> <p>BSSA1 (Asiatic Carpets): Residential Garden: 2000sqm BSSA1 (Asiatic Carpets): Creative Square: 2000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Linear Open Space: approx. 1000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Rooftop Sport: approx. 1000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Rooftop Amenity: approx. 500sqm BSSA3 (Church End Local Centre): Market Square: approx. 2000sqm Denzil Road Pocket Park: approx. 500sqm Conley Road Pocket Park: approx. 500sqm</p> <p>The masterplan SPD also identifies the need for improvements to existing open spaces.</p> <p>On Section 5.3 Green and Open Spaces, Development Principle PLR1- PLR5 support the provision of high-quality, inclusive save play interventions across all CEGA boundary. An indication of where future play facilities will take place can be found on figure 34.</p> <p>The masterplan SPD a number of new play spaces, which are also demonstrated on Figure 34.</p>	

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F056	Resident 55	Support for Young People Employment	<p>Supportive of the plan.</p> <p>Indicated need for jobs for young people, help for self-employed, help with jobs for adults and a community centre.</p>	<p>We welcome the support.</p> <p>The masterplan SPD indicates development options for key sites in Church End. And to accommodate the feedback we have received from young people the masterplan SPD supports the delivery of following:</p> <p>BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people.</p> <p>BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment.</p> <p>Brent Local Plan policy is to deliver economic growth and employment opportunities for all. Church End contains Locally Significant Industrial Sites (LSIS) and Local Employment Sites (LES) designated to intensify industrial uses through co-location with residential uses.</p> <p>The draft CEGA Masterplan SPD articulates how redevelopment can deliver these principles, with the total amount of employment floorspace across the main Local Plan CEGA Site Allocations as follows:</p> <p>BSSA1 (Asiatic Carpets) (LES/LSIS): 17,673sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate) (LSIS): 16,727sqm BSSA3 (Church End Local Centre): 3,995sqm BSSA4 (Chapman's and Sapcote Estate) (LSIS): 23,343sqm BSSA5 (Willesden Bus Depot): 6,479sqm BSSA8 (McGovern's Yard): 1,760sqm Total: 69,978sqm</p> <p>Redevelopment will be expected to improve the quality of industrial stock in the area, with the provision of modern light industrial facilities. The draft CEGA Masterplan SPD shows how all Site Allocations can increase the amount of employment floorspace, except BSSA1 (Asiatic Carpets) where the LES part of</p>	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				the Site Allocation designated for mixed use redevelopment since 2010 retains industrial floorspace, but at a lower amount.	
F057	Resident 56	General	Not supportive of the vision but supportive of the challenges and opportunities presented. Key issues indicated were: housing cost, drugs, unsafe environment, discrimination.	Comment noted. The masterplan SPD addresses in the vision the issues highlighted regarding safety, anti-social behaviour and discrimination. The masterplan SPD also states that affordability should be prioritised achieving when viable 50% of the units.	No change.
F058	Resident 57	Play Spaces Green Spaces	Supportive of the plan. Indicated the need for spaces for children to play, open green spaces and community facilities.	We welcome the support. The masterplan SPD indicates development options for key sites in Church End. And to accommodate the feedback we have received from young people the masterplan SPD supports the delivery of following: BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people. BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment. The draft CEGA Masterplan SPD details Site Allocation policy requirements for new development to provide three (3) new community spaces and re-provide one (1) new public house as follows: BSSA1 (Asiatic Carpets) 1x community space recommended to be linked to the existing arts and film production, for training and employment for young people, approx. 900sqm. BSSA2 (B&M Home Store & Cobbold Industrial Estate) 1x health facility - subject to local demand and agreement with the ICS - approx. 1,855m2 1x Brent Enterprise Hub: approx. 900sqm	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				BSSA5 (Willesden Bus Depot) 1x Public House re-provision. approx. 480sqm	
F059	Resident 58	Housing	Supportive of the plan. Highlighted the need for more housing.	We welcome the support. The masterplan supports the need for housing by supporting the delivery of 1300 new homes.	No change.
F060	Resident 59	General	Supportive of the plan.	We welcome the support	No change.
F061	Resident 60	Housing	Supportive of the plan. Highlighted housing shortage as one of the challenges and the need for more a more diverse range of shops included a supermarket.	We welcome the support. The masterplan supports the need for housing by supporting the delivery of 1300 new homes. The target is for a minimum of 35%, and when viable 50%, of new homes to be new affordable homes. The masterplan SPD identifies a number of opportunities for new redevelopment and new retail floorspace, but makes no specific recommendations for a new supermarket. Proposals for any new supermarket in the CEGA would be considered within the context of any impacts on the vitality and viability of nearby town centres. Lidl has previously expressed interest in providing a new supermarket as part of redevelopment in the CEGA but no proposals are confirmed.	No change.
F062	Resident 61	General	Supportive of the plan. Considered challenging creating new green spaces in such constraint environment. One of the key challenges is that the area is a nucleon for drugs in the area. How will the plan tackle that? A priority is preservation of the Church Road market. Since the development of Hornby Court onwards has always been skipping the establishment of a secure and consistent home for the market. We have been informed of a huge school being built on Neasden Ln. We hope the surrounding	We welcome the support. The masterplan SPD details Site Allocation policy requirements for new development to provide six (6) new green spaces, plus, two (2) pocket parks, totalling approximately 9,500m2 of additional green space as follows: BSSA1 (Asiatic Carpets): Residential Garden: 2000sqm BSSA1 (Asiatic Carpets): Creative Square: 2000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Linear Open Space: approx. 1000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Rooftop Sport: approx. 1000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Rooftop Amenity: approx. 500sqm BSSA3 (Church End Local Centre): Market	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
Page 265			roads will be able to cope with the influx of traffic. I have a very positive view of the future and I am confident no matter what Brent Council will be able to achieve or not.	<p>Square: approx. 2000sqm Denzil Road Pocket Park: approx. 500sqm Conley Road Pocket Park: approx. 500sqm</p> <p>The masterplan SPD also identifies the need for improvements to existing open spaces.</p> <p>Consultation with the local community indicated support for the market to stay local while redevelopment takes place, and measures for it to happen had taken place. The new council scheme will provide a newly designed market square to support the local economy and the footfall in Church End local town centre.</p> <p>Brent Council has a statutory duty to ensure there are sufficient school places for Brent children. Brent's latest School Place Planning Strategy 2019-2023 (November 2022 refresh) indicates Brent will continue to have a high number of spare places across the primary system at a borough level. CEGA is located within Primary Planning Area 4 which is forecast to have high levels of spare places to 2027.</p> <p>Brent 2022 school planning forecasts also confirm sufficient secondary school places to meet demand up to 2028/29 in all year groups. North Brent Secondary School is under construction on Local Plan CEGA Site Allocation BSSA19 Chancel House, Neasden Lane, which will provide 900 secondary schools places when completed in 2023.</p> <p>Growth Areas, including CEGA, where there are a number of new housing developments are kept under close review. Further details on Brent's School Place Planning Strategy are available here: https://democracy.brent.gov.uk/documents/s127138/12a.%20Appendix%201%20-%20School%20Place%20Planning%20Strategy%20Refresh.pdf</p>	
	F063 RG – Member Conservative Party	General	<p>Not supportive of the plan.</p> <p>Plan seems to be centred around housing. Unsupportive of taller buildings as these are undesirable to most families.</p>	<p>Comment noted.</p> <p>The masterplan SPD provides reprovision of the current employment floorspace as well as additional green and open spaces and housing to support local needs.</p>	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
Page 266			<p>Upskilling the local community that work on basic jobs needs immediate action.</p> <p>Church Road needs very urgent attention and local shopping needs to be prioritised.</p> <p>The Asiatic Carpet site could feature a range of small scale production units.</p> <p>Assessing needs and possibilities 10-15 years ahead is impossible and might make the plan irrelevant.</p> <p>On design, it is vital that the horrors of Wembley and the A5 corridor do not repeat.</p>	<p>The masterplan proposes mid-rise redevelopment to meet the identified need for housing within the borough in accordance with the London Plan and NPPF. The development is of a modest scale but achieves densities which are conducive to sustainable development and help ensure that people can meet their needs locally without the need to travel by car.</p> <p>Major developments require 20% of jobs to be secured locally, for both construction, and where they include non-residential floorspace, for the operational phase also. This includes financial contributions towards the Brent Works initiative which helps upskill local residents and get them back into meaningful employment such as local apprenticeships. This is in accordance with Local Plan policy BE1, and the Planning Obligations SPD.</p> <p>The proposal for BSSA1 Asiatic Carpets will focus on retaining existing businesses within the Cygnus Business Centre while intensifying floorspace and consolidating shared service yards and access points. It will also focus on providing community space linked to the existing arts and film production supporting training and employment for young people delivering a mixed use neighbourhood focussed around a film and media production hub (building upon the existing Neasden Studios), supported by affordable workspace, complementary light industrial, community spaces, open space and play space</p> <p>It is recommended the masterplan will be kept under review to ensure it keeps up with the demand and needs of the local population. Whilst there are always uncertainties, local authorities have a responsibility to plan for the needs of a growing population, and Brent's Local Plan does so on the basis of available evidence and data.</p>	

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HYS1	Peabody/Catalyst	General	<p>Supportive of the plan.</p> <p>We own a significant number of homes along Church Road, and would welcome discussions to level up the area and deliver affordable homes.</p> <p>We are supportive of site allocations. We believe affordable housing should be maximised across all tenures.</p> <p>Peabody/Catalyst would welcome any opportunity to work with the council towards bringing forward new affordable homes and provide necessary upgrades to the area.</p>	<p>We welcome the support.</p> <p>The masterplan SPD provides as one of the appendices further design guidance on how future developments can be expected to take place within Church Road high street.</p> <p>The Council welcomes any suggestions or initiatives to work collaboratively to improve area's environment and to delivery genuine affordable homes.</p>	No change.
HYS2	Resident 62	Religion Workspaces Building Design	<p>Not supportive of the plan.</p> <p>There is no mention of the faith and how it can help with the challenges faced by the community.</p> <p>Highlighted the need for work and operating spaces for businesses.</p> <p>Suggested the choice of brickwork to continue with the already standing buildings.</p> <p>Does not consider there was enough focus on reviving the Christian faith within the area nor has there been any understanding of the challenge to win souls for Christ.</p>	<p>Comment noted. Church End has a rich cultural history, with a diverse community. All developments proposed aim to celebrate the area's heritage and the cultural diversity of its existing communities, whilst continuing to welcome new residents and businesses. The masterplan SPD should be inclusive of all types of religion, without prioritizations.</p> <p>The masterplan aims to ensure quality employment floorspace is reprovided in case of any site allocation's redevelopment, to ensure the local economy can continue to thrive.</p> <p>Section 5.4 Building Design and Architecture provides a number of high-quality design references as well as development principles to ensure the highest design quality is achieved through new developments.</p>	No changes
HYS3	Resident 63	Building Heights	Not supportive of the plan.	Comment noted.	Propose change: Add additional page on Section 5.1 explaining the

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			Highlighted the environment lacks harmony and that buildings are far too tall.	<p>The development proposal seeks to provide sufficient housing, green spaces and employment facilities to support local needs and demand. Due to the limited land availability within the borough, the demanding housing targets, and the cost of land, the Council must ensure that existing brownfield land is developed effectively through a design-led approach to ensure targets are met, and development is deliverable.</p> <p>The approach for developing building heights considered a gradual increase of storeys. Building heights just increase towards the middle of the site, attempting to limit their impact to the existing residential urban grain. Further text can be added to the SPD to describe the rationale used for the proposal.</p>	approach for building heights and consideration with adjacent properties.
Page 268	Brent Cycling Campaign	Safe Travel	<p>Supportive of the plan.</p> <p>Additional significant challenge of safe travel through the Church End area, which is dominated by fast, busy roads with poor or disconnected active travel options.</p> <p>There is clear need to safe cycle routes to the local tube stations which must be facilitated by a combination of on road protected cycle infrastructure (on Neasden Lane and High Road) and traffic reduction (on Dalymeyer Road, Chapter Road, and Colin Road). "Cycle Lanes" are insufficient, any infrastructure on main roads must be protected.</p> <p>Refer to response publish via https://www.brentcyclists.org.uk/2022/09/28/church-end-growth-area-master-plan/ and shared via email.</p>	<p>We welcome the support.</p> <p>Brent being committed to seeking progressive ways to improve provision, safety and amenity for active travel modes including cycle infrastructure in line with contemporary standards and guidance. Parts of CEGA fall within the Church End/Roundwood Green Neighbourhood area as part of which a number of traffic free and traffic reduced green routes for walking and cycling are proposed.</p> <p>Section 5.2 is solely dedicated on Movement and Connectivity and it demonstrates improvements planned in the local area when redevelopment takes place (figure 30).</p> <p>The section also includes detail on the cycle routes towards key locations. Where possible, protected cycle lanes are planned. However, some routes are not possible to accommodate protected cycle lane infrastructure due to constraint widths. Therefore, adequate signage and speed limits can help ensure a safer environment for cyclists.</p>	Please see E019-1 / E019-5
	Resident 64	Young People	<p>Agreed with challenges and opportunities presented.</p> <p>Asked for more environmental and youth services.</p>	The masterplan SPD indicates development options for key sites in Church End. And to accommodate the feedback we have received from young people the masterplan SPD supports the delivery of following:	No changes

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				<p>BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people.</p> <p>BSSA2 B&M Home Store and Cobbold Industrial Estate: 1x rooftop sports pitch focused on young people.</p> <p>BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment.</p>	
HYS6	Resident 65	Cycle Infrastructure	There is a lack of cycling infrastructure, both pathways and parking.	<p>Safe travel is a key component for a successful and thriving neighbourhood.</p> <p>Section 5.2 is solely dedicated on Movement and Connectivity and it demonstrates improvements planned in the local area when redevelopment takes place (figure 30).</p> <p>The section also includes detail on the cycle routes towards key locations. Where possible, protected cycle lanes are planned. However, some routes are not possible to accommodate protected cycle lane infrastructure due to constraint widths. Therefore, adequate signage and speed limits can help ensure a safer environment for cyclists.</p>	No change.
HYS7	Resident 66	Workspaces Infrastructure	<p>Highlighted the need for more non-residential land use.</p> <p>Too much traffic and people.</p> <p>Brent has a high population density that is stressing us all out. Need more space for small business, workshops, light industrial, NOT more houses and flats without the supporting infrastructure. The area is becoming impossible to live in.</p>	<p>The masterplan SPD was developed considering local needs for housing, green and open spaces, as well as employment spaces. Mixed use redevelopment provides both new housing and employment space to accommodate a growing population. A number of infrastructure improvements and interventions are planned to support growth, such as:</p> <ul style="list-style-type: none"> - A new secondary school - New community facilities - A potential new health hub – if need identified by the ICS - Location for optimised employment floorspace - New and improved parks and open spaces - Roads and cycle lanes 	No change.
HYS8	Resident 67	General	Supportive of the plan.	We welcome the support.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
HYS9	Resident 68	General	Supportive of the plan.	We welcome the support.	No change.
HYS10	Resident 69	General	<p>Shop fronts need to be clean tidy and presentable, new retail shops needed h&m , river island, Nike can be outlets so it is cheaper, JD.</p> <p>Challenges are you can change the appearance but if you don't help and educate the community it will not be productive,</p> <p>English classes should be available free of charge, activities for young people boxing help get them off the streets, football could put a goals in there , coffee shops.</p> <p>Needs to be shops, the whole area is depressing and people throw litter on the street because there is no respect for the area. Ensure all shops have a minimum standard. More retail shops branded names are welcoming.</p> <p>Overall, presentation of the area needs to be improved. More bins, lighting so young people feel safe, store fronts need to be transformed, education is important, this can be through boxing, and other activities to keep children and young adults off the streets. Community worker patrolling at night so my young daughter feels safe when walking back from work.</p> <ul style="list-style-type: none"> - more bins - better lighting - more plants and flowers - better shops and shop fronts more retails and branded companies - community boxing centre to keep kids and young adults off the streets. 	<p>Comment noted.</p> <p>The masterplan SPD promotes a number of local improvements to help Church End to become a thriving welcoming neighbourhood. The Council has a dedicated Town Centre Manager for Church End and a number of initiatives taking place to promote a safer and more attractive high street. All new shops will be of a high modern standard, although the Council cannot enforce these standards on existing shops where they are not proposing changes requiring planning permission. Neither can the council dictate which shops occupy new or existing retail floorspace. The SPD seeks to improve the public realm which in turn, and through local investment from developers, will help make the town centres more attractive to visitors and occupiers.</p> <p>The SPD aims to promote a clear a cohesive vision for the area supporting the community to work together towards a common goal. Proposed Framework on Section 5.2 provide details of the elements needed to provide a more quality and welcoming environment.</p>	No change.
HYS11	Resident 70	Young People	I think it is imperative to offer young children in the area and young adults' activities to do after	We welcome the support.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
Page 271		<p>Retail Offer</p> <p>Quality of the Environment</p>	<p>work / school, community boxing, dancing to keep them off the streets and productive</p> <p>Priory: shop fronts are falling apart there has to be a standard set , more clothing stores Zara, H&M, Next, boots, Superdrug, Starbucks these places will attract different crowds and help integrate people better</p> <p>Near Franklyn Road where I live, shops round corner are unsafe and dirty. remove and put clothing and chain shops that help attract diversity so we feel safe.</p> <p>Walking around most young girls do not feel safe, there should be better lights on streets, flowers, more trees and bins provide.</p> <p>Shop fronts are falling apart, dirty and look very bad. We want this area to attract a diverse range of people so everyone can mix and learn off one another.</p> <p>To help this area grow it is imperative that we provide housing not just for council but also private rentals and buyers. this will ensure a better mix.</p> <p>Littering and flytipping is a major concern, provide more bins.</p> <p>Children and young adults are lost in this area. Some are uneducated or do not have family support or can not afford to do activities are school/ work.</p> <p>Boxing clubs are an amazing way to bring young boys and girls off the streets, teach them discipline and show them people care and there is a better life out there. sometimes all these young people need is someone to look up to and guide them.</p>	<p>A number of initiatives focusing on young people are expected to take place in the area. As part of the masterplan SPD development we have:</p> <p>BSSA1 Asiatic Carpets: Approximately 900sqm of community space linked to the existing arts and film production to support training and employment for young people.</p> <p>BSSA2 B&M Home Store and Cobbold Industrial Estate: 1x rooftop sports pitch focused on young people.</p> <p>BSSA3 Church End Local Town Centre: spaces for young people art and local enterprise are encouraged as part of high street redevelopment.</p> <p>Other than that, the masterplan indicates a number of locations for new shops as well as new open and green spaces and improvement to existing ones.</p> <p>The draft CEGA Masterplan SPD identifies a number of opportunities for new redevelopment and new retail floorspace, but makes no specific recommendations for a new supermarket. Proposals for any new supermarket in the CEGA would be considered within the context of any impacts on the vitality and viability of nearby town centres. Lidl has previously expressed interest in providing a new supermarket as part of redevelopment in the CEGA but no proposals are confirmed.</p> <p>The masterplan SPD was developed to ensure a safe and welcoming neighbourhood is delivered for the community. The Council will continue to engage with local police services to ensure the safety of the area is a top priority for all.</p> <p>The masterplan proposes mid-rise redevelopment to meet the identified need for housing within the borough in accordance with the London Plan and NPPF. The development is of a modest scale but achieves densities which are conducive to sustainable development and help ensure that people can meet their needs locally without the need to travel by car.</p>	

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			<p>Overall, more bins, flowers, better shops retail, coffee shops, Italian, bistros. More activities for young adults and children boxing community, dancing etc. payment needs to be improved hazard for elderly and disabled.</p> <p>Clean all graffiti off walls. Sainsburys or a Tesco. No high rise flats. Police patrol or community workers at night.</p>		
HYS12	Resident 71	Safety ASB Housing	<p>Bring back policing, get rid of the drugs, crime and gangs. They are so prolific, if we the residents know of drug dealing and taking happening so openly why dont the police? Because there are none, Zero about.</p> <p>Crime, drugs and hose breaking are rife. Street crime and muggings will increase as the area becomes more affluent, Policing must increase.</p> <p>Housing should be made a priority for those who work in Hospitals, Schools, Police and Fire services to ensure their longevity to the area. My partner works in a local school, all the kids know her and have respect for her, she can talk to them and help them. This is the thing communities are made of.</p>	<p>A number of initiatives are being developed to tackle crime and anti-social behaviour.</p> <p>The masterplan SPD provides a cohesive and clear framework for new developments. Investment in the area will support the creation of a safe and welcoming environment which is part of the vision outlined for the area.</p> <p>Housing that can accommodate key workers is accessible through either shared ownership for those on qualifying incomes, an increasing number of build for rent schemes that have to provide London Living Rent accommodation or the Council's I4B programmer of letting dwellings below market rents. Schemes that have a 100% focus on key workers have historically created issues for funders which now makes them reluctant to lend on these types of schemes. They are concerned about long rental voids where there is no interest in them from key workers and lets to alternative occupants are not easily possible.</p>	No change.
HYS13	Resident 72	Housing PTAL	<p>Supportive the plan.</p> <p>Preference for C3 residential, rather than other types e.g. PBSA or coliving. Recognise the aspiration for industrial alongside resi (beds and sheds) but feel there are few exemplars of this in London- will need very careful design here given the history of high car traffic for the existing industrial uses.</p> <p>Density and massing feel appropriate for local context. Shame that more of the bus depot can't</p>	<p>We welcome the support.</p> <p>Plan on Section 5.4 Building Design/Proposed Framework indicates C3 use across the CEGA. Examples of good precedents are provided to ensure high quality designs are delivered.</p> <p>Metroline owns the site and it is proposed for the Bus depot to remain in the locality as it stands due to its operational requirements. Minor redevelopment is proposed on the side facing the high street as a way to optimise Metroline's operations and to activate the high street for more local businesses.</p>	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
Page 213 HYS14			be utilised for new homes but presume operational needs prevent this. Would be interested to understand the PTAL ratings of the developments furthest from Dollis Hill, particularly as the new West London Orbital must be in doubt due to TFL's funding woes. Would have liked to see stronger aspirations for a new cycle network- Brent is very poorly provisioned already and the road maintenance is shocking. Any new cycle routes will need to be mindful of existing cycle connections outside of the CEGA- do you have transport studies showing where the primary directions of travel are to provide a focused scope? Is it to Wembley, tube stations, into central London?	<p>Safe travel is a key component for a successful and thriving neighbourhood. Section 5.2 is solely dedicated on Movement and Connectivity and it demonstrates improvements planned in the local area when redevelopment takes place (figure 30). The section also includes detail on the cycle routes towards key locations. Where possible, protected cycle lanes are planned. However, some routes are not possible to accommodate protected cycle lane infrastructure due to constraint widths. Therefore, adequate signage and speed limits can help ensure a safer environment for cyclists.</p> <p>Weekdays am/morning cycle movements from the south of the borough are generally predominately southbound, towards central London. The Council is working on a new Active Travel Implementation Plan which will serve as a review and update to both Brent's Cycling Strategy and Brent's Walking Strategy. This will also include a review of the borough's aims and objectives regarding improvements and expansions to the existing cycle infrastructure.</p>	
	Metroline Travel	BSSA5	<p>Regeneration is needed but will clearly affect businesses in the area.</p> <p>The bus garage is privately owned and employs circa 500 people, the operations/ engineering and management team need to be on the same site. We agree regeneration is required, but the bus garage function is both very important to the area and essential for local travel. operationally it is very difficult to make adjustments as it operates 24 hrs per day.</p>	<p>We acknowledge Metroline own the site and it is proposed for the Bus depot to remain in the locality as it stands. Minor redevelopment is proposed on the side facing the high street as a way to optimise Metroline's operations and to activate the high street for more local businesses.</p> <p>We understand the importance of the Bus Depot for the locality and we are keen to engage and work closely to develop proposals that support both the bus operations as well as local needs.</p>	See above at E07-10.
	Resident 73	General	<p>Supportive of the plan.</p> <p>The masterplan SPD identifies all deficiencies and has correct priorities. If even half of the plan is delivered in 10-15 years, it will be a major improvement to the area.</p>	We welcome the support.	No change.
	Resident 74	Site Allocations	Supportive of the plan.	We welcome the support.	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
Page 274			<p>I think you should reconsider where you intend to place Dudden Hill station. It would be better placed at the intersection of the Dudden Hill line and the Jubilee line. This could enable TfL to reposition Neasden station (or at the very least more easily create a walkable route) which would make this an interchange station between the Jubilee and Dudden Hill Overground lines. This would result in more people travelling through the area.</p> <p>The movement of Neasden station to the other side of Neasden Lane to interchange with the Dudden Hill line would also give you the opportunity to reposition Neasden Lane - if it was a straight road (running through the current industrial yards, instead of having a bend in it) it would run closer to the rail line connection loop - which would give you a larger parcel of land to the east (closer to Severn Way) - and this parcel of land would be much more appropriate for residential development: right next to an existing residential area, and away from a dirty and noisy rail line which also overlook an aggregates yard.</p> <p>Cycling provision is very important so I will be keenly watching how this is developed and implemented in these plans. There is a significant opportunity to make a positive difference if cycling infrastructure is included in the plans for the area - and it would have huge benefits beyond just this development area too - with forethought and good design your proposed cycling accommodations could link up with the Church Path cycle track and provide safe journeys and Quietways from Neasden through Church End to Harlesden, Kensal Green and Shepherd's Bush.</p>	<p>The location of the Proposed WLO Station will be a TfL's decision based on what works best for the infrastructure. Brent can provide steer and guidance, but the ultimate decision will be TfL.</p> <p>We will pass this suggestion to TfL.</p> <p>Cycling provision is key to promote active travel. Where possible, protected cycle lanes are planned. However, some routes are not possible to accommodate protected cycle lane infrastructure due to constraint widths. Therefore, adequate signage and speed limits can help ensure a safer environment for cyclists.</p>	
	HYS17 Resident 75	Heritage	There is insufficient consideration of the significant historic sites on the edge of the CEGA (ie the church) but there is a vital opportunity to	Comment noted. The Masterplan has a dedicated section discussing heritage within the area on p 56.57. Development	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
			<p>open up access to one of London's hidden historic sites with potentially huge significance for the growth of Church End (the church).</p> <p>I am broadly supportive of the regeneration plan, which is long overdue. There needs to be parallel investment in crime prevention, public safety, and civic pride.</p>	Principle H1 Heritage identifies the need for prioritise restoration and retention of architectural features in case of redevelopment.	
HYS18	Resident 76	Parking Building Heights	<p>Supportive of the plan.</p> <p>Did not agreed with the challenges. Key issue is parking availability.</p> <p>Church end should remain a green area. Enough tall buildings but not enough parking.</p>	<p>We welcome the support.</p> <p>Reducing travel by private car through car-free or car-lite development supported by provision for shared mobility including car clubs are part of development principle TM2 Car ownership and parking.</p>	No change.
HYS19	Not identified	Building Heights Green Spaces	<p>Not supportive of the plan.</p> <p>It is no good just building high tower flats etc, Green spaces are needed and good quality shops. The residents there are not rich and from ethnic minority groups. We need community assets also and places to do keep fit etc, Certainly no pubs or betting shops.</p> <p>Brent is not very good at doing things. They purchased the Picture Palace and it has very opened for the whole community. It is designated a black heritage place. Why do we need that? We need something with classes etc for all races and groups. Are you not being discriminating in calling it these and even racist?</p>	<p>Comment noted.</p> <p>The masterplan SPD proposes a balance of different elements that aim to support local needs. High quality housing, green and open spaces as well as improvements in roads and existing spaces are key for the community.</p> <p>Building an inclusive space is part of the values and objectives for the plans and development principles aim to achieve that as part of new developments.</p> <p>Public houses are considered to provide a community role. As a result, they are supported in town centre locations, and their loss is resisted. Betting offices are restricted in accordance with Local Plan policy BE5.</p> <p>The composition of the town centres uses/occupiers are largely outside of the Councils control, we can ensure that proposals for new retail floorspace are inclusive and accessible in design terms, allowing for disabled access. We do however try and limit the quantity of potentially harmful uses, such as take-aways, betting shops, amusement centres, and payday loan shops which will allow for other, more desirable uses to proliferate.</p>	No change.

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HYS20	Not identified	General	Supportive of the plan.	We welcome the support.	No change.
HYS21	Not identified	Cycle Infrastructure	Supportive of the plan. Needs more thought about pedestrians and cyclists.	We welcome the support. Safe travel is a key component for a successful and thriving neighbourhood. Section 5.2 is solely dedicated on Movement and Connectivity and it demonstrates improvements planned in the local area when redevelopment takes place (figure 30). The section also includes detail on the cycle routes towards key locations. Where possible, protected cycle lanes are planned. However, some routes are not possible to accommodate protected cycle lane infrastructure due to constraint widths. Therefore, adequate signage and speed limits can help ensure a safer environment for cyclists.	No change.
HYS22	Not identified	Housing	Not supportive of the plan. Housing for people that have been in temporary accommodation for years	Comment noted. The masterplan supports the need for housing by supporting the delivery of 1300 new homes. A minimum of 35%, and when viable 50%, of new homes are to be affordable. This will assist in moving some people out of temporary accommodation. However, it is accepted that without significant wider investment in affordable housing supported by central government, that the ability to make significant headway in reducing the length of time of those in temporary accommodation will probably be limited compared to the rising list.	No change.
HYS23	Not identified	General	Supportive of the plan.	We welcome the support.	No change.
HYS24	Not identified	Green Spaces Safety	Supportive of the plan. Green space for children. Make the area safer for children and young people.	We welcome the support. The masterplan SPD details Site Allocation policy requirements for new development to provide six new green spaces, plus, two pocket parks, totalling approximately 9,500m2 of additional green space as follows:	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
Page 277				<p>BSSA1 (Asiatic Carpets): Residential Garden: 2000sqm BSSA1 (Asiatic Carpets): Creative Square: 2000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Linear Open Space: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Sport: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Amenity: approx. 500sqm BSSA3 (Church End Local Centre): Market Square: approx. 2000sqm Denzil Road Pocket Park: approx. 500sqm Conley Road Pocket Park: approx. 500sqm</p> <p>The masterplan SPD also identifies the need for improvements to existing open spaces.</p> <p>Figure 45 also provides an overview of the local open space network within a 5, 15 and 25 minute walk from the centre of CEGA. Within CEGA's inner boundary, the cemetery and church yard offer limited opportunities for recreation such as sports and play.</p>	
	HYS25	Not identified	<p>Green Spaces</p> <p>Supportive of the plan.</p> <p>Building Density</p> <p>I think a couple less buildings and a big green space in their place would make the area much better.</p> <p>There's a lack of a big green space to balance all the contamination that so many new flats will generate over the next decades considering their energy consumption.</p> <p>There could be more green spaces.</p>	<p>We welcome the support.</p> <p>The proposed developments aim to support local needs for housing as well as for open and green spaces.</p> <p>The masterplan SPD details Site Allocation policy requirements for new development to provide six new green spaces, plus, two pocket parks, totalling approximately 9,500m2 of additional green space as follows:</p> <p>BSSA1 (Asiatic Carpets): Residential Garden: 2000sqm BSSA1 (Asiatic Carpets): Creative Square: 2000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Linear Open Space: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Sport: approx. 1000sqm BSSA2 B&M Home Store & Cobbold Industrial Estate): Rooftop Amenity: approx. 500sqm</p>	No change.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				<p>BSSA3 (Church End Local Centre): Market Square: approx. 2000sqm Denzil Road Pocket Park: approx. 500sqm Conley Road Pocket Park: approx. 500sqm The masterplan SPD also identifies the need for improvements to existing open spaces.</p>	
HYS26	Not identified	<p>Health Infrastructure</p> <p>Safe Travel</p> <p>ASB</p> <p>Housing Tenure</p> <p>Play Spaces</p> <p>Safety</p>	<p>Supportive of the plan.</p> <p>I am concerned about the lack of health care being planned. I am also surprised by how often it says that there is no opportunity for green spaces and I think you need to be more creative. Green spaces need to be a priority at this end of the high road!</p> <p>Generally I think this could be good but we need shops and services as well as homes! This need to be thought about more</p>	<p>We welcome the support.</p> <p>The North West London Integrated Care System (ICS) was consulted as officers developed the draft CEGA Masterplan SPD. The ICS stated by May 2021 that based on current predicted needs there is no need for an additional health hub/facility within the CEGA boundary. Yet, the masterplan SPD also designates Site Allocation BSSA2 (B&M Home Store & Cobbold Industrial Estate) for redevelopment and provision of a health facility (approximately 1,855m2) should local needs and demand change, and subject to agreement with the ICS. A review of local health needs with the ICS is expected to take place every 5 years. .</p> <p>The masterplan SPD also designates Site Allocation BSSA2 (B&M Home Store & Cobbold Industrial Estate) for redevelopment and provision of a health facility (approximately 1,855m2) should local needs and demand change, and subject to agreement with the ICS.</p> <p>A review of local health needs with the ICS is expected to take place every 5 years.</p> <p>The masterplan SPD details Site Allocation policy requirements for new development to provide six (6) new green spaces, plus, two (2) pocket parks, totalling approximately 9,500m2 of additional green space as follows:</p> <p>BSSA1 (Asiatic Carpets): Residential Garden: 2000sqm BSSA1 (Asiatic Carpets): Creative Square: 2000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Linear Open Space: approx. 1000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Rooftop Sport: approx. 1000sqm BSSA2 (B&M Home Store & Cobbold Industrial Estate): Rooftop</p>	No change.

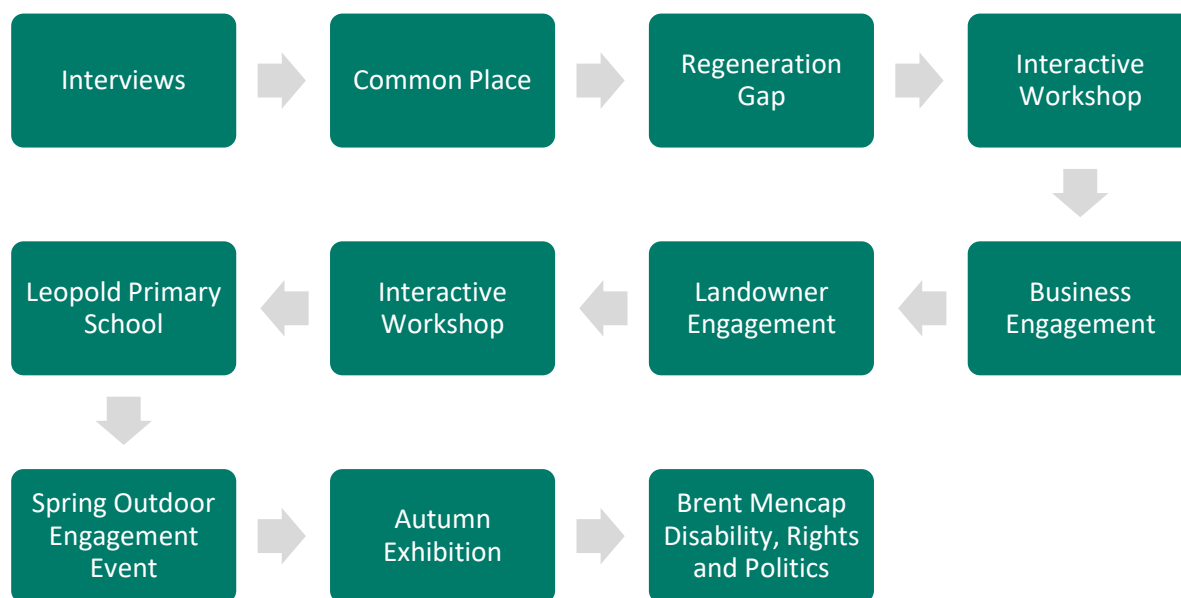
REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
				<p>Amenity: approx. 500sqm BSSA3 (Church End Local Centre): Market Square: approx. 2000sqm Denzil Road Pocket Park: approx. 500sqm Conley Road Pocket Park: approx. 500sqm</p> <p>The masterplan SPD also identifies the need for improvements to existing open spaces.</p>	
HYS27	Not identified	General	<p>Needs to be safer on the street. People. keep cycling fast and I and my child have been almost hit several times while walking on the pavement. Also people play really loud music all through the night. I think its important to consider all types of households including disabled people and people with children.</p> <p>I think its important the playgrounds are safe. It's not just building them because we already have parks and playgrounds, but they are all full of rubbish, broken glass and sometimes medicine bottles.</p> <p>I think we need safe places to go which don't have loud music. Nowadays it is hard to walk down the street without hearing very loud music and this is hard for someone in my family with sensory issues.</p>	<p>Safe travel is a key component for a successful and thriving neighbourhood.</p> <p>Section 5.2 is solely dedicated on Movement and Connectivity and it demonstrates improvements planned in the local area when redevelopment takes place (figure 30).</p> <p>The section also includes detail on the cycle routes towards key locations. Where possible, protected cycle lanes are planned. However, some routes are not possible to accommodate protected cycle lane infrastructure due to constraint widths. Therefore, adequate signage and speed limits can help ensure a safer environment for cyclists.</p> <p>Development principle H6 Accessible and adaptable housing: states that new developments should provide at least 10% of dwellings to meet Building Regulations requirement M4(3) 'wheelchair accessible standard' and the remainder to meet M4(2) 'accessible and adaptable dwellings.' (London Plan policy D7).</p> <p>25% of new homes as family-sized dwellings (3 bed+).</p> <p>The Council's environment team deal with issues associated with noise complaints. The SPD seeks to address the potential issues generated as a result of new development, such as the interaction between the industrial and residential uses. It cannot legislate for individual behaviour which can only be addressed through the Council's complaints system and other statutory enforcement regimes.</p>	<p>Further detail on the cycle infrastructure is being added to Section 5.2 Movement and Connectivity. Please see reps E07-11 onwards as well as paragraph 5.2 3 adding details on speed limits.</p>
HYS28	Not identified	General	Supportive of the plan.	We welcome the support.	No changes.

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
HYS29	Not identified	General.	Supportive of the plan. Did not agree with the challenges but did not provided comments with the reason.	We welcome the support.	No changes.
HYS30	Not identified	Building Heights	Not supportive of the plan. Very high buildings close to each other.	Comment noted. The development proposal seeks to provide sufficient housing, green spaces and employment facilities to support local needs and demand. The approach for developing building heights considered a gradual increase of storeys. Buildings adjacent to existing residential areas are no bigger than 3 storeys high. Building heights just increase towards the middle of the site, providing no impact to the existing residential urban grain. Further text can be added to describe the rationale used for the proposal.	No changes.
HYS31	Not identified	Traffic Flow Cycle Infrastructure Safety	Supportive of the plan. In order to make considerable improvements issue of traffic flow, specifically large commercial vehicles using residential streets as a cut through must be addressed. Alongside width restrictions, and timed road closures, proper bike lanes safe for family use need to be created. In addition, all pavement parking should be removed as it is unsafe and unjust for wheelchair users and buggy users to not have access to safe pavements. Currently the area is unsafe for women and young families to move freely in. The lack of proper transport, safe bike lanes, useable footpaths, and clean walkways is huge problem in the area. Fly tipping is also a major issue on all local roads. Whilst this report is very encouraging, changes to transport safety and pollution need to be made far more swiftly.	We welcome the support. Development principle OGS3 Safety states that new developments will create safe spaces and secure access by designing out crime, and by providing well-lit and overlooked spaces, adjacent uses that provide activation. (Local Plan policy BG11) Safe travel is a key component for a successful and thriving neighbourhood. Section 5.2 is solely dedicated on Movement and Connectivity and it demonstrates improvements planned in the local area when redevelopment takes place (figure 30). Removal of pavement parking is one of the considerations as part of the Green Neighbourhood proposals. Word addition to demonstrate clear commitment to avoid any further introduction of footway parking and phasing out of existing footway parking.	<u>Text added:</u> Movement and Connectivity/ Development Principles / TM2 Car ownership and parking: TM2 Car ownership and parking: Reduce travel by private car through car-free or car-lite development supported by provision for shared mobility including car clubs. Provision must be made for charging electric or Ultra Low Emission vehicles. (Local Plan policy BT2) <u>Footway parking should be avoided.</u>

REP #	RESPONDENT NAME / ORGANISATION	DRAFT SPD CHAPTER/SECTION/PARA	SUMMARY OF RESPONSE	OFFICER CONSIDERATION	PROPOSED CHANGES
HYS32	Not identified	Street Greening Gentrification	Supportive of the plan. Plant trees everywhere possible, plant hedges/climbers along edges of pavements on busy roads to cut down on traffic fumes for pedestrians, prioritise pedestrians over cars (at the moment cars get parking spaces on pavements!) So glad this is happening, I hope it doesn't lead to massive gentrification.	We welcome the support. The potential for street trees is set out within the movement framework/ street typology. Additional trees will be provided in developments to address the need to attain the relevant urban greening factor scores for residential and commercial developments.	No change.
HYS33	Not identified	General	Supportive of the plan. Did not agree with the challenges but did not provide comments with the reason.	We welcome the support. Challenges were identified through a number of different engagement activities undertaken throughout the year of 2021.	No change.
HYS34	Not identified	Infrastructure Allotments Links between sites Green Spaces Maintenance	Supportive of the plan. Distances for disabled foot traffic from doctor/dentists/supermarket. There is an opportunity for allotments at Roundwood Park (see Kilburn) Ensure that the links between the sites are fully accessible on foot for all foot traffic; think about water sinks along hard paving; and the possibility of restoring water features/streams etc into the green spaces. Overall a good plan but often plans and actuality do not match. In particular green space maintenance responsibility is forgotten - see green walls on flats by West Hampstead Overground station. And the failure to provide the planned greening around Willesden Library when it proved expensive. Think about how very small areas can be greened by the community such as on roundabouts or edges of roads.	We welcome the support. Section 5.2 Proposed Framework indicates a number of improvements to ensure CEGA is accessible and green. We hope to work with developers to maximise opportunities for greening and accessibility within the area.	No change.

Pre-Statutory Consultation Events

Please see below a summary of the events undertaken between March 2021 – December 2021 that have informed the CEGA masterplan SPD designs:



Interviews

We conducted 13 interviews with local stakeholders and community groups to build a picture of the qualities of social infrastructure, including the relationships that make the town centre function as well as learning in greater detail how existing buildings and spaces are used. Leaders of existing community and faith groups participate of the meetings as means of tapping into existing social networks, alongside high street businesses and a major local provider of social housing. As the conversations occurred through a national lockdown, all were held online. We spoke to:

- voluntary community groups
- local charities
- local housing association, as well as HA-run community centre
- 2 faith groups
- local market
- 2 high street businesses
- management of Willesden Market

The findings of the meetings above were the following:

The Growth Area spans between multiple neighbourhoods: “Kids from Church Road would not dare walk to Neasden Studios, as they will not feel safe”. While the western end of the Growth Area relates strongly to Harlesden, the east is more strongly bound to Willesden. Connections between the two ends are poor and there are safety concerns associated with gang territories.

The Growth Area's high streets are still an important reference point and meeting place for local residents: While the retail environment on Church Road and High Road is challenging, with high numbers of vacant units, the Town Centre and its marketplace remain crucial spaces where many local residential communities come together and encounter one another. However, some 'communities don't feel welcome in the Town Centre.

There is limited 'neutral' community spaces: To the west, the Unity Centre, and the east, the Learie Constantine and the Dudden Hill Community Centres provide much-needed community spaces. The outdoor market is an important space where informal social encounters between residents can happen.

Existing community spaces are struggling to meet local needs. *"There are lots of good small things going, but there are bigger problems to address."* Local charities and voluntary groups report a lack of suitable spaces to meet and reach out to service users, while those who run community spaces find that some users struggle to access their spaces due to crime, antisocial behaviour, and poor pedestrian routes and lighting within the area.

Local people are stepping in to fill voids in social provision, and to link existing residents to public services. *"You can't just sit back and not do anything"*. Many of the organisations we have spoken with were set up by local people in direct response to urgent community needs which they experienced first-hand. In several cases, organisations have emerged to bridge the gap between residents and other public services, and their embedment in the local community is central to their purpose.

Social infrastructure networks are still developing: *"Church End could become more connected to the rest of the borough and even the world."* Existing social infrastructure is linked by individuals, functional relationships and by necessity. Links between existing groups were actively fostered during planning for an outdoor festival in Church Road as part of Brent's Borough of Culture festivities, which could not go ahead at the time due to the pandemic. This seems to mark a point in the dialogue between faith and ethnic groups that is still in its early stages.

Working age and older residents of Church End are still getting to know one another: *"We live together, but not together"*. Church End's diversity is a source of local pride, but, while young people mix well within the area, social cohesion among older generations is reportedly low. Language barriers are a significant contributing factor, as is a high rate of resident turnover.

Existing green spaces and public spaces are under pressure: *"If you need a green space to go to with your child, there is nothing within walking distance."* In the absence of larger public spaces within the Growth Area, the green spaces around St. Mary's Church and the pavements in the Town Centre are important social and amenity spaces. However, the pavements in the Town Centre can feel narrow and compromised, while the green space can feel dark and unsafe at night. Other, larger green spaces and play facilities are not available within easy walking distance from the Growth Area.

The Growth Area urgently needs to provide more, and safer, opportunities for young people: *"These are kids that are from the area and we have watched grow up. We need to help them set their minds for a better future"*. The need to provide opportunities for youth, particularly around skills, training and employment, was voiced consistently across the interviews. To work well in Church End, a successful offer needs to meet young people where they are, be attractive, and offer consistency, agency and ownership to participants.

Residents feel that there are inadequate training and employment opportunities to support a growing population: Interviewees and consultees agree on the central importance of training and

employment opportunities to improving life for everyone in the Growth Area. The pandemic has brought increased awareness of poor mental health and general well-being in the Growth Area. While this is likely linked in part to overcrowded housing, and exacerbated through the pandemic by multi-generational households, anxiety and lost income through reduced employment, it can also be attributed to challenges in accessing services and getting accurate diagnoses.

Residents in the Growth Area are cautiously receptive to change: *“There are wounds that are yet to heal”*. There is widespread disappointment in the failure of previous regeneration in the area to improve the lot of existing residents. There is a sense that the area is overdue for significant renewal, but also strong conviction that any future development must be accompanied by tangible improvements to the shared environment.

Common Place

The [Common Place](#) provides a user-friendly platform to engage and consult with communities and stakeholders, helping to maximise participation, broaden engagement demographics, build trust through transparency, and facilitate collaboration to inform better designs. By the end of March 2021 the platform had gathered:

- 754 visitors
- 453 contributions
- 97 respondents and
- 50 news subscribers

The majority of respondents were local residents (over 60%) and there was also a significant number of people who shop in the town centre (over 20%). Most respondents were aged between 25-54, with very few over 55 + overall, comments and agreements were mostly negative (65% and 85% respectively).

Overall, many themes from the interview series were echoed in contributions to the map. There is a general sense that residents are receptive and even eager for change and development in the area, provided that it brings improvements to social infrastructure, and an over-riding sense that intervention of some kind is required to support a neighbourhood in crisis.

Concerns regarding personal safety and the impact of crime, particularly on young people, were very frequently voiced, together with a number of comments pointing to low levels of social cohesion.

Responses added additional detailed observations on public realm, with many holding concerns around the dominance of motor traffic, poorly tended and maintained public realm along the High Road, Church Road, Neasden Lane and the marketplace. Some spirited debate was in evidence around the existing retail offer, and the general environment of the high street on Church Road. Although it provides a dwell space in an area, it is heavily compromised by traffic. Ships could appeal to wider residents to contribute to a wider sense of belonging.

Regeneration Gap

The Regeneration Gap was a video developed by United Borders where young people highlight their concerns for the future. The film titled, [‘Regeneration Gap’](#) featured both young people from Church End and some adults who had grown up in the area and witnessed it change. Together they

discussed how the area has changed, the current issues faced by local youth, the challenges and potential of regeneration and also the innate strengths of the local community:

“Give people more opportunities, give the kids more opportunity so that they can turn to somebody and look up to somebody...”

“There needs to be more social events to bring people together. Once people are together through social events, it builds a rapport and builds up a strong community that are willing to talk together.”

“We’ve always been creative around here... Even before the lights and the cameras, the whole world wanted to know what Church Road was saying if you knew about us, you knew you wanted to hear what we had to say.”

Interactive Workshops

To test and develop the social infrastructure of the area and gain an in-depth understanding of local skills, training and employment, we conducted two interactive online workshops with local stakeholders. The two workshops covered the topics of ‘skills, training and employment’ and ‘social infrastructure’.

As the workshops occurred during a national lockdown, they were both held online. They were formatted as a digital presentation over Zoom, followed by group discussions within breakout rooms with interactive exercises on digital worksheets uploaded on Miro. The workshops included representatives from the local community, education & training specialists, workspace operators and Brent council, and the outcomes are set below:

Skills, Training and Employment

The area is in need of a new local ‘hub’ and potentially a well-known anchor tenant to attract new businesses to Church End. The growth of new businesses in the area would require new attractive public realm, green spaces and lunch time offerings to encourage people to want to work in the area. The area is in need of new large-scale supermarket that offers affordable, essential and everyday needs. Not only could this provide the community with a much-needed retail offering, but could also provide local employment opportunities.

The provision of affordable workspace is essential to encourage the growth of local creative and entrepreneurial industries. Prominent needs specific to Church End are requirements for training opportunities in media and film, as well as language skills. Establishing links between existing training organisations and non-English speaking communities is a persistent challenge. Training provision should be responsive, flexible, and cannot wait for the full masterplan period to respond to existing needs. It was suggested that training opportunities should be mobile and embedded within existing social infrastructure. There remains a challenge in encouraging Church End residents to be mobile and access opportunities.

The process of development should present training opportunities, both through apprenticeships in construction sector jobs and by incorporating ‘meanwhile’ developments in delivery phasing. ‘Meanwhile’ uses have the potential to respond quickly to shifting local needs. Training opportunities need to be delivered through the development process. This may be best achieved by bringing training opportunities into close proximity with communities, e.g. in town centre and high street locations, in and around existing community spaces, rather than on new sites.

Social Infrastructure

It is important that new spaces are community centric to allow people to comfortably come together and socialise as a community. The town centre was pinpointed as an ideal location.

Independent play was highlighted as important to local youth and the idea of passive supervision was discussed as a method of facilitating this. Nearby shops spilling into, and overlooking, these spaces could offer this. A community focus, use or even programme within these spaces could potentially achieve this too.

Ownership was raised as a very important consideration for any new public spaces in the area. Any new successful open space needs to imbue the community with a sense of ownership over it. Existing residents consider safety and security as essential characteristics for new public spaces. They should be comfortable, clean, well-kept and secure. The area is home to vulnerable people who are struggling with addiction and homelessness, and it is important that the masterplan does not turn its back on them. Youth should remain a key focus to the provision of new community spaces, however, the elderly and people with disabilities must be considered.

Trust, integrity, long-term commitment and local roots were identified as key prerequisites for the creation of successful community space. Music is of great importance to the cultural identity of Church End and has the potential to engage young people. There is a need to support the development of enterprise skills and opportunities for physical activity.

The vacant high street properties in the town centre, together with un- or underused first floor storerooms, potential sites for community space, together with ground floor spaces to new development on the market site. Due to their distance from existing residences, the industrial sites could play an important role in supporting music/film activity.

Spaces associated with faith groups (i.e. churches) have the potential to play an expanded community role.

Spring Outdoor Engagement Event

We conducted a public street-side consultation event at Willesden market on Wednesday 12th May 2021, in order to consult the public on the masterplan so far and also some preliminary design propositions. We presented 6 A1 consultation boards, titled: introduction, stakeholder engagement, movement and streets, employment and community uses, massing and open space and how it will work.

Overall +/- 45 people attended the event.

All of those who engaged in detailed conversation were positive and supportive of the aims of the Masterplan. However a number of key issues were reinforced as being essential, this included- affordability of housing and workspace, crime and anti-social behaviour, community ownership over open spaces, the need of retail and supermarket for all community groups and the local importance of Willesden market.

Affordable housing and workspace remained an important issue that was raised by many attendees. It is generally understood as being critical to future cohesion between the existing communities and new developments. "I hope that spatial change will bring along with it social change" "I hope that it (new development) won't cause greater division".

School Engagement

We attended Year 6 classes at both the Hawkshead and Gwenneth Rickus campuses, gave a presentation explaining the Church End Masterplan, the role of different professions within the regeneration process, and also introduced a ‘homework task’.

The homework task was devised to help the Masterplan team to understand Church End through the eyes of younger children, as well as raising local awareness of the Masterplan among parents. Students were asked to draw their journey to school and then layer that journey with illustrations of Church End through their individual perspectives, desires and opinions.

Drawings received suggest that, even for younger people, the Town Centre shops are central to their understanding of Church End as a place. Trees and greenery feature prominently in their drawings, but they also note the presence of heavy vehicle traffic which they encounter on their way to school, and in one case make reference to anti-social behaviour and a lack of perceived safety.

Proposal elements of the students’ drawings focus primarily on the provision of new open and play spaces, which appear adventurous in nature and supporting wildlife, but also cafés and small grocery shops. This may suggest that they perceive the social value of these amenities to their parents and see the need for multi-generational social spaces.

Landowner Engagement

We had dedicated meetings with the major landowners of the following sites: BSSA1, BSSA2, BSSA3, BSSA4 and BSSA5. Discussions were useful to understand the phasing and the timing for future redevelopment. Proposals in the masterplan were then developed so sites could come forward independently in different periods. Individual particularities about the sites were taken into consideration when developing the proposals to support its deliverability.

Businesses Survey – Industrial Sites

To develop a masterplan that can maximise opportunities for local and new businesses to grow and develop, Brent’s Regeneration Team developed a Business Survey to reach out to those businesses based within the industrial sites. It aimed to understand the following:

- Character, size and operational requirements
- Growth expectations
- Positive and negative aspects about being located in Church End
- Opportunities for local improvement
- Suitability and affordability of the premises used

The Survey was shared via post to more than 300 businesses. The Council also shared this via email to more than 50 businesses currently within the masterplan stakeholder’s list, including industrial and high street businesses. In parallel to that, the team also visited 20 businesses located within the CEGA Site Allocations, between 8th and 13th April 2021, where 12 surveys were completed in a short face-to-face interview. Two additional surveys were sent via email. Findings are set below:

- Businesses consider Church End good for its location and business network – some highlighted having complementary uses/retailers as a positive aspect. i.e. plumbers, construction material, kitchens, etc.
- Staff are based locally (staff and/or business owners).
- Consider Church End bad in terms of crime, asb, frequent road works, parking and logistics/access to their premises.
- Welcome of improvements in infrastructure (better linking East/West/North/South links , support to young people, more police and an anchor to bring more interest to the area.

Overall businesses are happy with their premises and consider it affordable (potentially because many were freeholders). The ones which are leaseholders don't seem to have issues in terms of flexibility for change – seem to have a good relationship with freeholders.

Autumn Exhibition

We conducted a second round of on-site events in Church End. The first one taking place at Willesden market on Wednesday 13th October and the second one on Saturday 16th October 2021, in order to consult the public on the 1st drafted designs. We presented 6 A1 consultation boards, titled: About the masterplan, our response to what you said, What future could look like, Proposed ground floor designs and Next steps.

Overall, +/- 67 people attended the event.

All of those who engaged in detailed conversation were again positive and supportive of the aims of the Masterplan. However, recurrent issues such as lack of affordable housing and workspace, crime and anti-social behaviour, remained key topics.

Brent Mencap Disability, Rights and Politics Group

Brent council attended one of the meetings of Brent Mencap's Disability, Rights and Politics Group. The dynamic involved presenting the work developed up until the date of the activity and asking the following questions:

- What do you like or dislike about Church End?
- What do you visit in the area beyond Brent Mencap?
- What do you think about the proposals and what do you think its missing?

The findings of this activity are set below:

- The sense of community: For many this is the only time in the week they can meet and socialise with other people
- Bus service is good
- The market seems interesting – but very few people still go there as the area is unsafe
- Crime and how drugs are managed locally support a feeling of unsafety
- Neasden Lane is very busy and doesn't feel safe to cross or walk nearby
- There are not enough green spaces and wayfinding can be challenging.
- Traveling to Church End is expensive for some who are not local to the area which stops them from visiting

The majority of people do not visit Church End itself apart from Brent Mencap due to its bad reputation:

- The group supports the proposal but would like to see more:
- More affordable housing
- More green spaces
- Better street lighting and signposting/wayfinding to identify roads
- More accessible crossings and separation of cyclists/pedestrian/cars
- An environment that looks cleaner and more inviting
- Places for people to meet and socialise
- More publicly accessible toilets

ANNEX A



**BNP PARIBAS
REAL ESTATE**

BNP PARIBAS REAL ESTATE

CHURCH END GROWTH AREA DRAFT MASTERPLAN REVIEW OF REPRESENTATIONS IN RESPONSE TO CONSULTATION

Simply Planning on behalf of Kelaty Properties LLP (Asiatic Carpets)

- a. **The appraisal shows the BSSA1 allocation option 1 (which is that with no major retail scheme and which closest resembles the masterplan scheme) as having a £448,465 surplus with 35% affordable housing. The testing shows this drops to a £186 deficit at 36% affordable housing. As such, a 1% increase in affordable housing results in an approximate £450k reduction in the viability of the scheme. The Policies of the Local Plan and London Plan, require 50% affordable housing and this is reflected on page 70 of the draft CEGA SPD. Therefore, a policy compliant affordable housing scheme will result in an approximate £6.3m deficit;**

As noted below, sales values and commercial values have increased at a faster rate than costs since the viability study was undertaken. Furthermore, the representation mischaracterises the Local Plan and London Plan policies, both of which make provision for a 'viability tested' route for schemes that cannot achieve the relevant policy targets. The London Plan does not apply the 50% target as a quota.

- b. **The appraisal is based on August 2021 base rate building costs, which have significantly increased since this time due to increased in energy and building material costs. In addition, these costs do not account for the developments being required to be carbon zero, which will add a further substantial cost;**

Current policy does not require net zero carbon; London Plan policies require a 30% reduction below Part L 2021 which is reflected in the assessment. At present the costs of delivering net zero carbon are estimated at around 5% of construction costs, but this cost is likely to reduce over time as technologies adapt.

Build costs have increased since August 2021, but residential sales values and commercial rents have increased and yields have moved sharpened (even allowing for the post-September 2022 correction). Land Registry data for LB Brent indicates that sales values have increased from an average of £518,527 in August 2021 to £580,215 in October 2022 (11.9%). Over the same period, the BCIS Tender Price Index has increased from 339 (Qtr 2 2021) to 368 (Q1 2023), or 8.6%. As scheme GDV is a much higher relative to construction costs, the 11.9% increase in sales values has a much more significant impact on residual land value than the 8.6% increase in costs, resulting in a significant improvement in viability.

Clearly markets are cyclical and the Borough's Local Plan and the London Plan both make provision for a 'viability tested' route for schemes that cannot achieve the relevant affordable housing targets alongside other policy requirements. This will be tested (if necessary) when planning applications are submitted.

c. The two options assessed for the Asiatic Carpets site allocations do not reflect the schemes shown within the draft CEGA SPD;

The schemes in the CEGA SPD are indicative, as are those tested in the viability study. Detailed planning applications will need to be submitted in due course.

d. The benchmark land values vary between the two assessed options, whereas benchmark land values for the same sites should be consistent;

This is incorrect – the two options require different land areas and Option B assumes that 4,417 square metres of existing floorspace are retained and not required for development. This floor area will either be retained by the landowner, or sold to a third party for ongoing use.

e. The levels of affordable workspace are also not consistent with the massing and land use plans shown within the draft CEGA SPD; and

The viability assessment applies a level of workspace which is consistent with the Local Plan policy requirement.

f. The developer profit levels adopted in the options (these being 17% for private housing, 15% for commercial floor space and 6% for affordable housing) are unduly conservative for a complex development site such this, which includes multiple assets classes which would be largely speculative in nature and many potentially unknown development abnormals.

The levels of profit applied in the appraisal reflect the profit levels applied by developers on live planning applications submitted over the past 12 months (we assessed around 250 developments over that period, many of which were more complex than the subject site). We do not agree that the profit margins are conservative. When bidding for land, developers have frequently taken on a view on their profit margins and it is unlikely that those assuming higher profits would be selected as purchaser.

For the reasons outlined above, we consider that there will be a financial viability issue when our client progresses their site to planning application stage. Policy BE3 of the Local Plan requires the development of our client's land to achieve the retention of the maximum viable levels of industrial floor space. The affordable housing policies of the Local Plan and London Plan require the provision of 50% of affordable housing to be acceptable. Therefore, if this is to be achieved, using the viability evidence which underpins the draft CEGA SPD, it will require a significant reduction in industrial floor space, as the maximum viable provision will be significantly depressed by the need to address the shortfall between the tested 35% affordable housing against the Policy requirement of 50%.

As noted above, any financial viability issues will need to be tested at the planning application stage and a detailed assessment submitted with the planning application. This will then need to be independently tested on the Council's behalf and the conclusion of this assessment will inform the need for any amendment to affordable housing provision.

The London Plan and Local Plan only require 50% affordable housing for sites to qualify for the 'fast track' route; policies are expressly drafted so that sites that cannot meet this target are not sterilised. The 'viability tested' route in the London Plan (reflected also by the Local Plan) make provision for a reduced level of affordable housing on the basis of a proven viability case.

NDB and MNM representation (29-31 Cygnus Business Centre)

No specific comments on viability, although the representations alludes to concerns regarding the balance to be struck between different policy objectives. If a scheme that is submitted for planning is unable to viably deliver all the policy objectives in the plan, the application can be progressed through the London Plan 'viability tested' route (also reflected in the Local Plan). Any assertions regarding scheme viability will need to be tested and supported by a financial viability assessment submitted with the planning application. This will need to be independently reviewed on the Council's behalf to identify the maximum viable level of policy outputs.

BNP Paribas Real Estate

6 February 2023



Church Road BSSA3 Residential design guide

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This design guide has been produced to provide specific guidance for increasing residential accommodation in BSSA3 Church End Town Centre, and supplements the recommendations of the Church End Growth Area Masterplan.

The Masterplan document identifies that, while BSSA3 has been targeted in Brent’s emerging Local Plan for the delivery of 96 new homes (in addition to existing planning applications for the marketplace site), ownership is highly fractured. As well as making recommendations for improvements to the existing public realm and social infrastructure, the Masterplan posits a ‘site by site’ approach to redevelopment. This entails enabling existing landowners to either extend or redevelop high street properties.

This design guide will aim to provide individual landowners with a clear set of design parameters to comply with key planning policy constraints, respect the character of the historic high street, and highlight approaches to achieving Building Regulations compliance.



Church End town centre housing typologies

- Church End Town Centre housing typologies**
- Type 1 (1893-1915)
 - Type 2 (1874-1893)
 - Type 3 (1893-1915)
 - Type 4 (1920-1937)
 - Type 5 (1893-1915)
 - Other, 1 storey (1920-1937)
 - Other, 2-4 storey (1893-1915)

As noted in the Church End Growth Area Masterplan, BSSA3 is characterised by its high street, much of which dates from the Victorian era. Although many buildings are in poor condition, many of the structures and the overall rhythm of the high street remain largely intact.

Three principal typologies predominate. At the northeast of the high road, terraces of ornate three storey red brick buildings face one another across the street. While these idiosyncratic façades do much to establish the unique character of Church Road, the northwest side of the street is sadly gapped, with remaining structures in very poor condition.

Further to the southwest, as the high street opens out towards the dual carriageway, an older Victorian terrace of three storey buildings in yellow stock brick form a continuous terrace with upper façades generally in good condition.

At the southwest end of the site allocation, a more modest terrace of two storey red brick structures leads onto the dual carriageway.

While these three typologies are most prevalent, the town centre also includes some other isolated but characterful historic buildings, together with instances of contemporary infill across multiple plots.

The northwest side of the high street also includes terraces of a two storey Victorian typology that has unfortunately been rendered illegible by unsympathetic extensions and alterations.

In light of the poor condition of properties to the northwest of the high street, the Masterplan proposes site-by-site redevelopment here. As existing properties on the southeast side of the high street are to be retained within the masterplan, guidance included below is for suitable extension to these properties to increase residential accommodation.

(with gable front)

(without gable front)



This typology comprises ornate three-storey shopping parades built between 1893 and 1915. These include a shop front which protrudes slightly to contain bowed windows to the second and first floors, set within a brick and stucco arch feature. Roof pitches run from back to front. Historic photos indicate that three out of every four façades would have included a pronounced brick gable with an ox-eye window above eaves level. The centre of each sequence of three would also have included a pedestal and ball atop.

On the southeast side of the street, the majority of original façade features remain intact, although many brick gables are missing. Only one property on this terrace includes a front dormer extension, although there are several rear dormers and evidence of many loft conversions.

At low level, there is widespread evidence of disrepair, poor quality glazing, fascias and shop fronts.





These structures form a highly contiguous three storey Victorian shopping parade in yellow stock brick, constructed between 1874 and 1893. Upper façades remain in moderate condition. Shop fronts and fascias are largely poor quality, with many original features (corbels, pilasters) missing.

Roofs are flat at the front, with a pitch to the rear, set behind a high stuccowork cornice. With the exception of a hotel development above The Burrell Pub, properties do not feature roof extensions.





This two-storey shopping parade in red brick was constructed between 1893 and 1915. Its scale is modest, in particular relative to the dual carriageway which it curves to meet at the southwest of the town centre.

Many upper façades have been painted, and original features (pilasters, corbels) are missing at low level. Roofs are pitched steeply from front to back. No roof extensions are evident. Many units do not include separate residential street doors, and appear to be accessed via a narrow rear alley from Conley Road.





Sitting directly adjacent to typology 1, three single storey units feature an exuberant decorative balustrade at roof level. These units include successive rear extensions housing commercial units, but no roof extensions or residential accommodation.



Just two instances of this red brick typology are extant on the southeast side of the high street. Featuring a stepped elevation and a prominent hipped gable, the complex roof arrangement makes this typology less well suited to extension.



Roof extensions

Like many of London’s neighbourhoods, the historic patterns of the traditional Victorian high street form an important source of local character. The success of the high street relies on a balance between residential, commercial and community activities.

Roof extensions will have the potential to provide a valuable increase in residential accommodation, can improve the quality of existing homes on the high street, and expand the local customer base for existing high street businesses. However, in order to do so, extensions and alterations to existing high street properties should respect the following principles:

Roof extensions should preserve the proportion and character of existing street façades.

In practice, this will mean that roof extensions should be clearly differentiated in material treatment from the existing façade, and in many cases should sit back from the front of the building.

Roof extensions should be scaled appropriately.

In many cases, two storey roof extensions are likely to overbear the character of the existing building. It is also important to consider how a roof extension may impact on neighbours’ rights to light. BRE ‘Site Layout Planning for Daylight and Sunlight’ guidance should be used to assess impact. The diagram below set out the general 25° and 45° guidelines on when a detailed daylight and sunlight study may be required.

Maintain clear and legible access to flats directly from the high street.

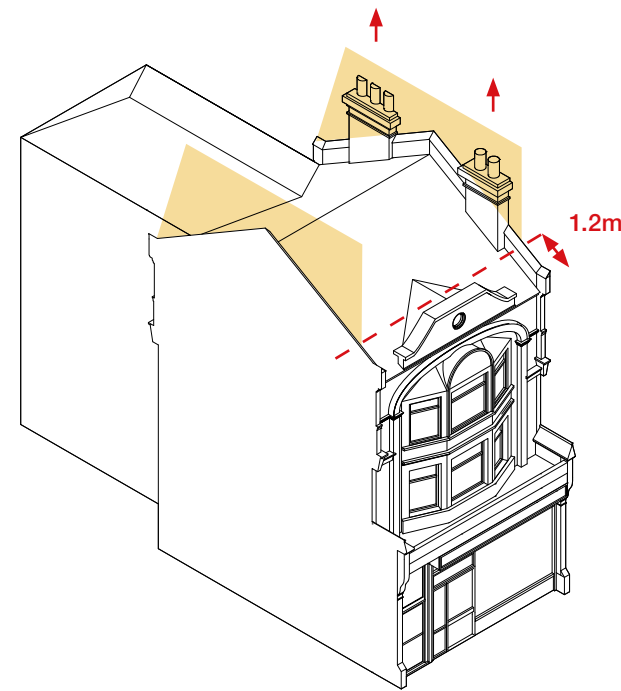
Keep residential entrances in a consistent position at the front of the building line, i.e. not recessed. Clearly differentiate residential entrances from shop fronts e.g. by using solid panel, unglazed doors in a different colour from the adjacent shop front.

Reinforce the rhythms of the high street at pavement level.

Where modifications to the property will affect the high street frontage at ground level, restore fascia signage and shop fronts to their original proportions. Where necessary, restore or replace original features such as pilasters and corbels.

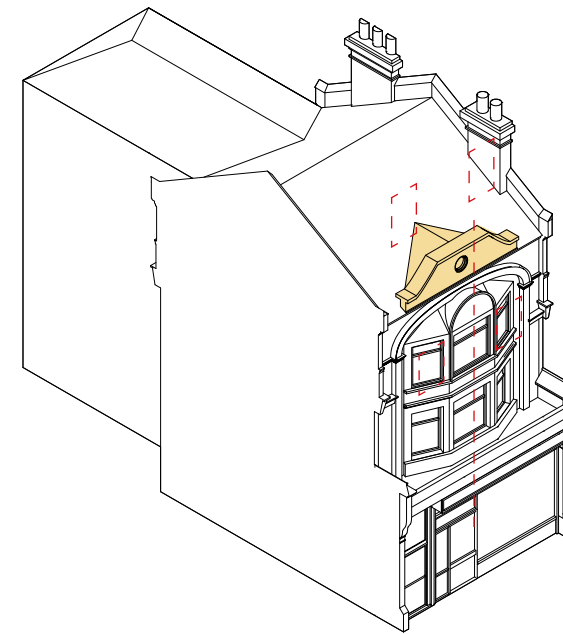
3.0 Roof extensions

3.1 Type 1



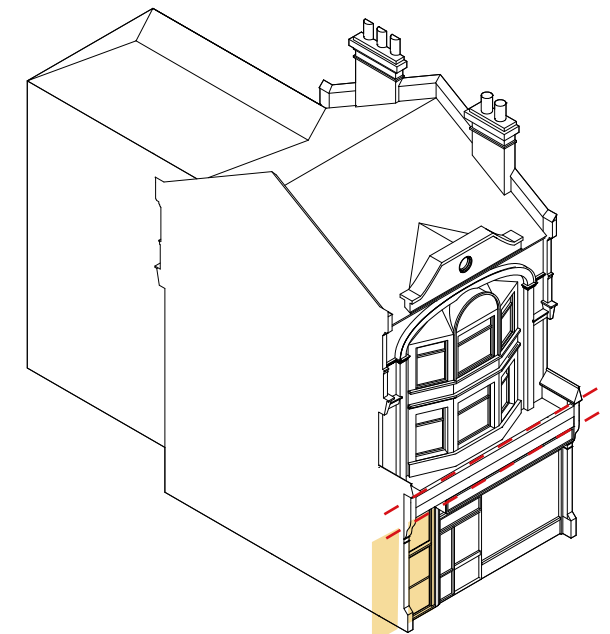
Preserve prominence of ornate gable ends.

- All roof extensions should sit min. 1.2 metres behind the front elevation and present a continuous, straight roof line.
- Front dormer extensions will not be acceptable, while rear dormers should preserve a min. 500mm separation from the party walls and 300mm below the roof ridge.
- Full width extensions should raise the party walls and chimney stacks in reclaimed brick to match the existing.



Respect the proportions and symmetry of existing façades.

- Align new glazing to second and first floor windows.
- Use visually contrasting, darker materials to recede visually from façade.
- Consider reinstatement of gable end detail where it can be clearly established from historic photography that this would have originally featured. Use reclaimed bricks, together with pre-cast details made to match the existing by an architectural moulding specialist.



Create entrances that are clearly legible and reinforce the patterns of the high street at pavement level.

- Most residential entrances are currently paired either side of the party wall. This arrangement should be preserved, with doors brought to the front of the building line wherever these are currently recessed.
- Shop front fascia signs should be aligned consistently across the terrace. The top of the fascia should sit below the top of the adjacent corbel heads. The underside of the fascia sign should sit above the base of the pilaster capital.
- Where necessary, a recessed 'sub-fascia' panel can be used to make up the difference in height between the principal fascia and the top of the shop front.
- Refer to Brent's Shopfronts SPD for further detail if the shop frontage will be significantly affected by the works.

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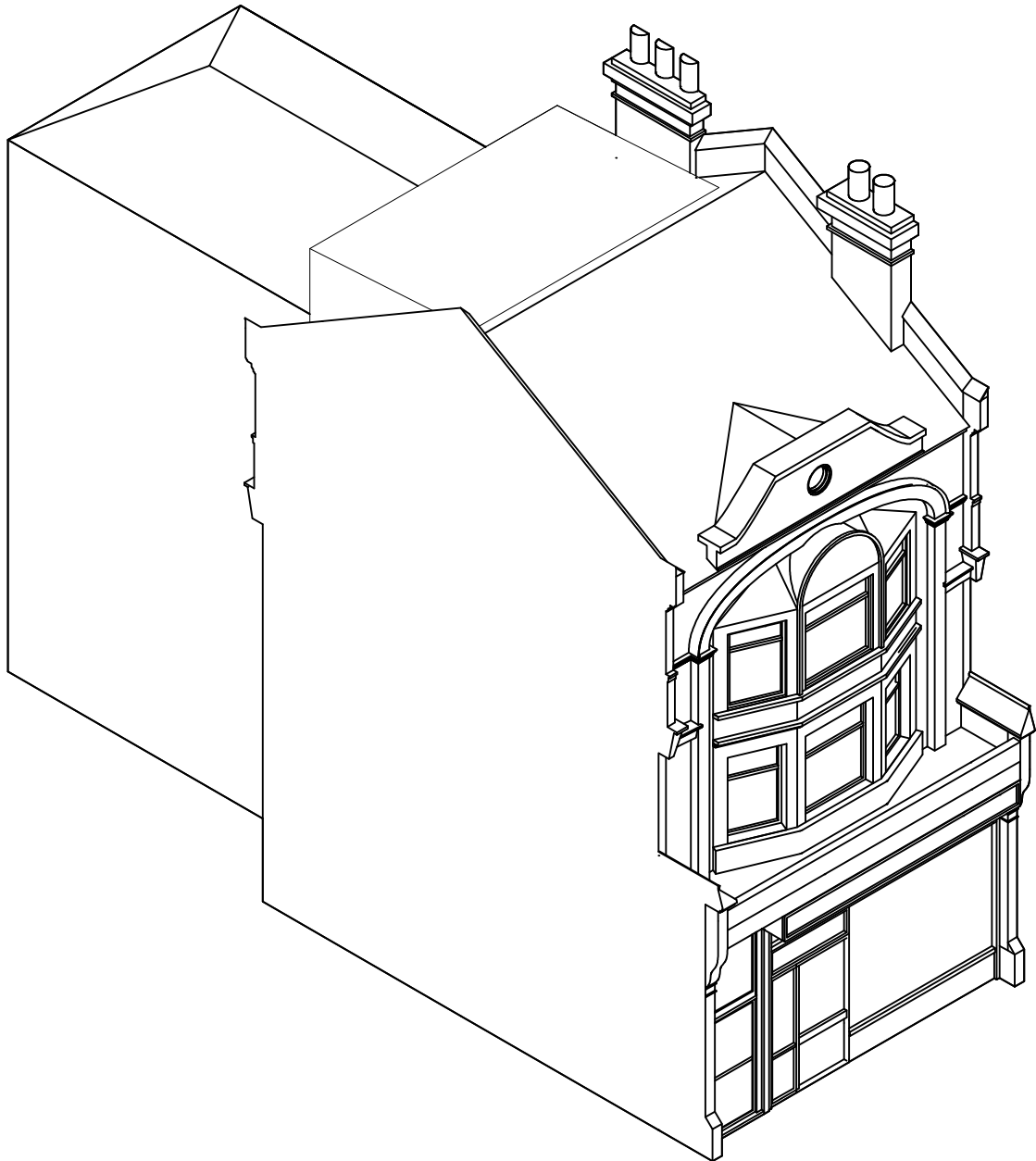
Option 1 – rear dormer

Outside of conservation areas, rear dormers are supported by SPD2 Residential Extensions and Alterations, which contains detailed guidance for their design. While this type of extension can only offer limited additional living space, depending on the existing internal arrangement, this could be sufficient to create, for example, an additional bedroom.

Rear dormers should not extend over the existing rear outrigger extensions. They should finish 300mm below the roof ridge so that they are not apparent from Church Road, and should be set off min. 500mm from the party walls.

As front dormers are not appropriate with this typology, new residential accommodation, generous glazing to the rear dormer will be required. Alternatively, rooflights to the front roof slope could be used to provide adequate daylighting and ventilation.

A contemporary material treatment can be used to contrast with the existing building fabric and avoid distorting the proportions of the original structure. Appropriate materials could include standing seam metal, well-detailed timber shingles or battens.



Example: 30 Lampmead Road, N4. Dormer extension sits behind the existing building line, does not follow the outrigger, and uses well-detailed standing seam metal with generous glazing.

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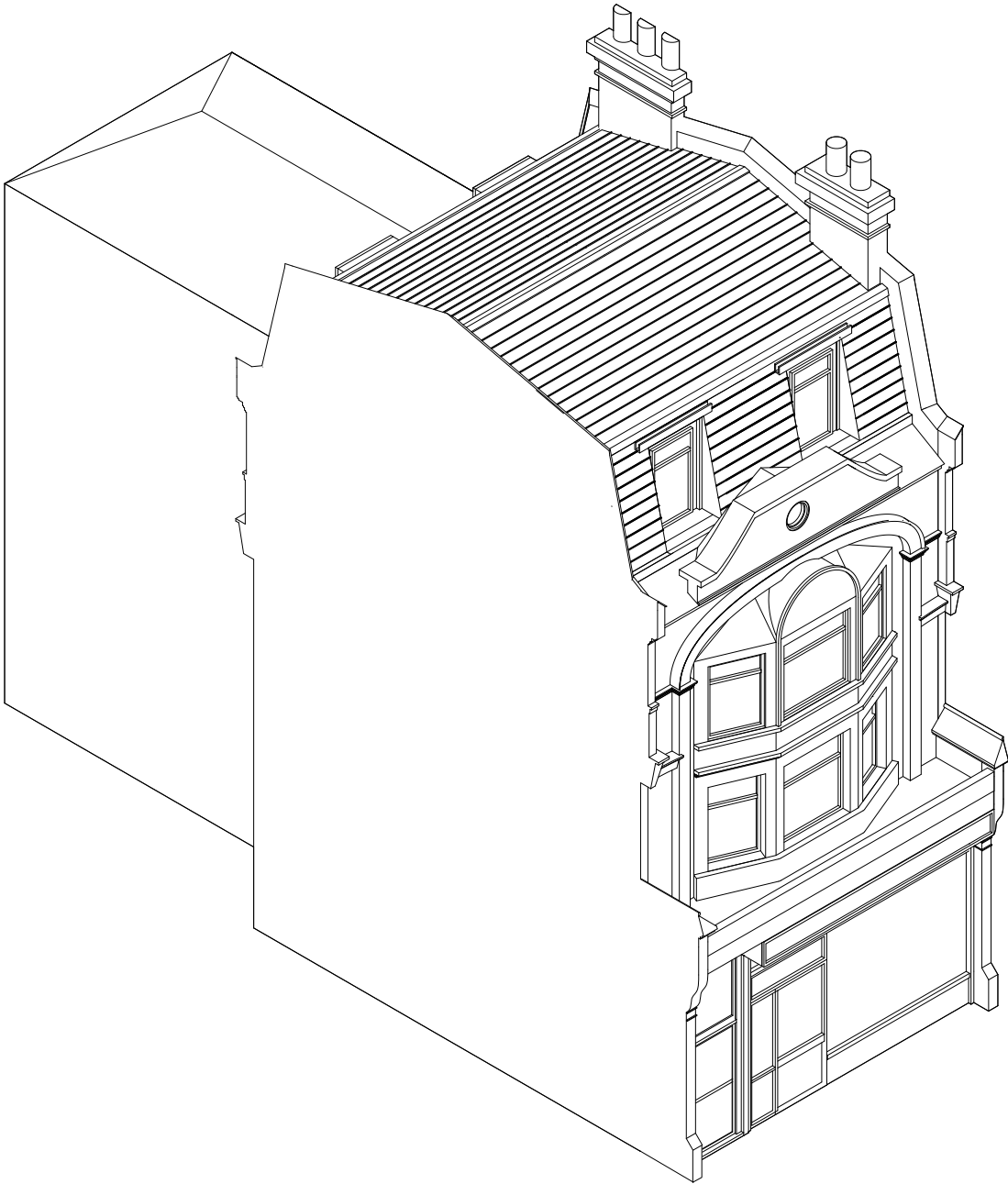
Option 2 – full mansard

Full width mansard-style extensions will create a simple, horizontal roof line which does not detract from the terrace’s gable end features. However, they will need to be set well back from the front elevation (min. 1.2 metres) to preserve the prominence of the gable detail.

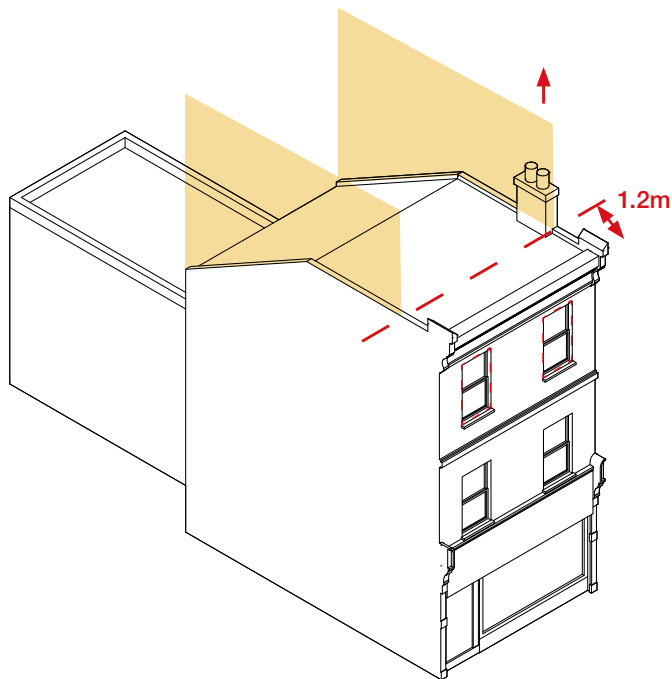
Mansard extensions should retain the position and height of the existing roof ridge. Party walls could be build up in red stock brick with precast twice weathered coping stones a minimum of 150mm above the new mansard roof level. Chimney stacks should be raised to match the existing material and detail.

Minimal contemporary detailing using a dark material, such as standing seam metal or good quality slates, will help the mansard recede visually. Windows to the front elevation should be recessed rather than protruding from the roof slope, and should align with the symmetry of the lower elevation.

Historic photos suggest that nos. 186, 194, 200, 202, 204 and 210 Church Road would have originally featured gable details, while nos. 184, 196 and 212 are missing significant portions of these. The restoration of these features should be included together with any proposed roof extension to these properties.

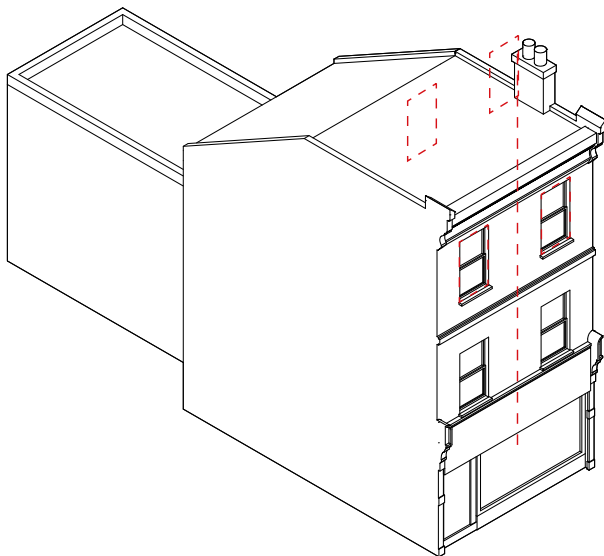


Example: Apartment building in Lyon by Fabien Perret Architectes. Mansard extension sits behind the elevation of the existing building. Recessed windows within a dark standing seam metal recede visually from the lower elevations.



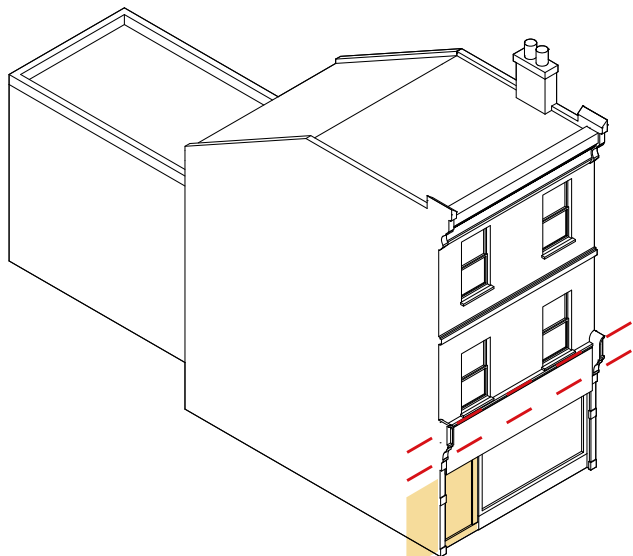
Respect the strong horizontal established by the cornice frieze

- As the front section of the roof is flat, dormer and mansard typologies will not be possible.
- The rear roof pitch allows for dormer extensions, which should preserve a min. 500mm separation from the roof ridge and the party walls.
- Full width roof extensions can help to preserve the strong horizontal composition of the façade, but should sit min. 1.2 metres behind the front elevation and present a continuous, straight roof line.
- Full width roof extensions should raise the party walls and chimney stacks in reclaimed brick to match the existing.



Continue the bold, simple symmetry of existing façades.

- Align new glazing to second and first floor windows.
- Use visually contrasting, darker materials to recede visually from façade.



Create entrances that are clearly legible and reinforce the patterns of the high street at pavement level.

- Residential entrances should be paired either side of the party wall to establish a clear rhythm.
- Where flats are currently accessed from the rear, proposals for roof extension should include reinstatement of entrances from Church Road.
- Shop front fascia signs should be aligned consistently across the terrace. The top of the fascia should sit below the top of the adjacent corbel heads. The underside of the fascia sign should sit above the base of the pilaster capital.
- Where necessary, a recessed 'sub-fascia' panel can be used to make up the difference in height between the principal fascia and the top of the shop front.
- Refer to Brent's Shopfronts SPD for further detail if the shop frontage will be significantly affected by the works.

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Full width roof extension

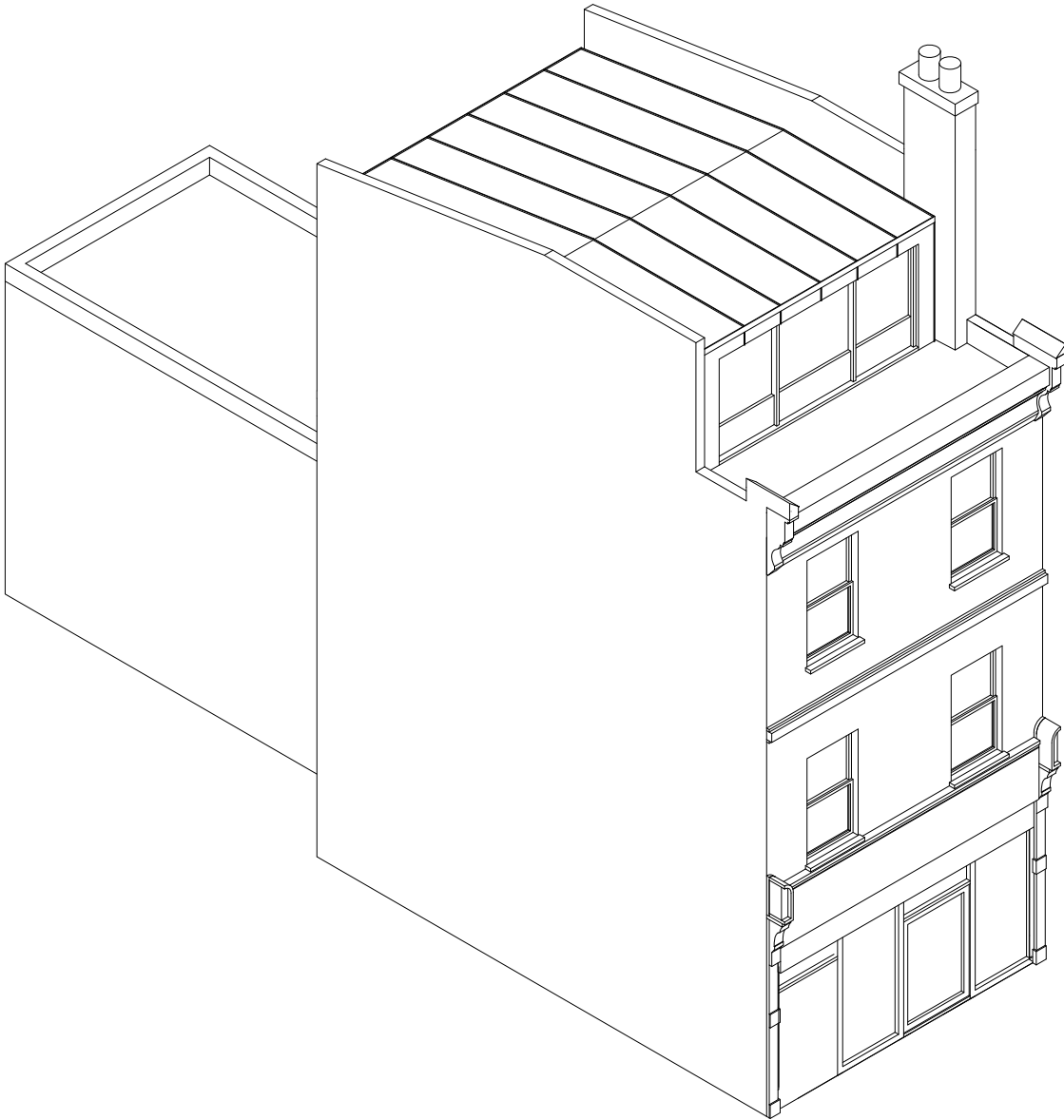
In order to achieve a significant quantity of additional living space, a single storey roof extension should extend across the full width of the existing structure. As the existing roof to the rear is currently pitched, this will add significant height at the rear. As a result, it may be necessary to assess the impact on any neighbouring dormer windows which site back from the roof edge.

Full width roof extensions should sit back from the existing façade by a minimum of 1 metre. A gently sloping or flat roof, rather than a pitch, will maximise internal headroom without undue impact on the street.

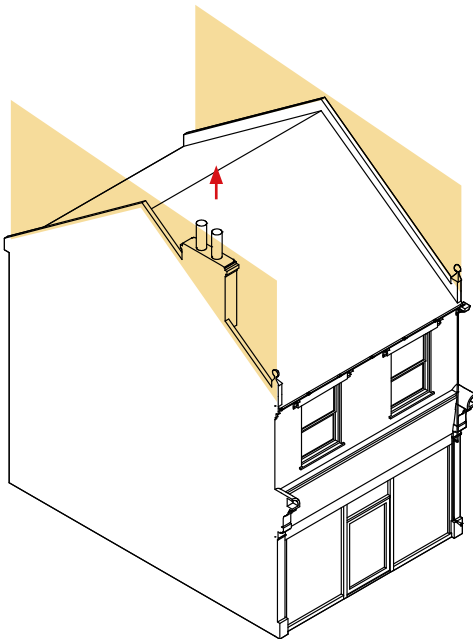
Roof extensions should span the entire width of the property and raise party walls in yellow stock brick to match the existing. This will ensure that the ability of neighbouring owners to extend upward is not prejudiced.

Many existing chimney stacks are missing. Where they remain, it will be necessary to raise the chimney in material and detail to match the existing.

In order to avoid distortion of the existing typology, extensions should strike a sympathetic contrast with the existing façade by using carefully detailed contemporary materials. This could include standing seam metal or timber cladding.

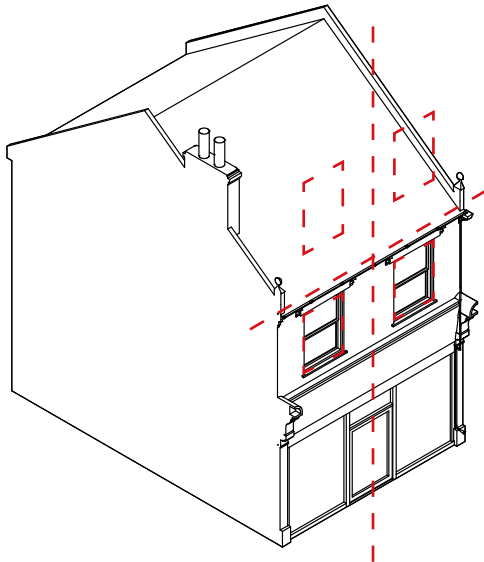


Example: Roof extension in Dartmouth Park. Contemporary extension with low profile sits well behind parapet of existing building with distinct contemporary material treatment.



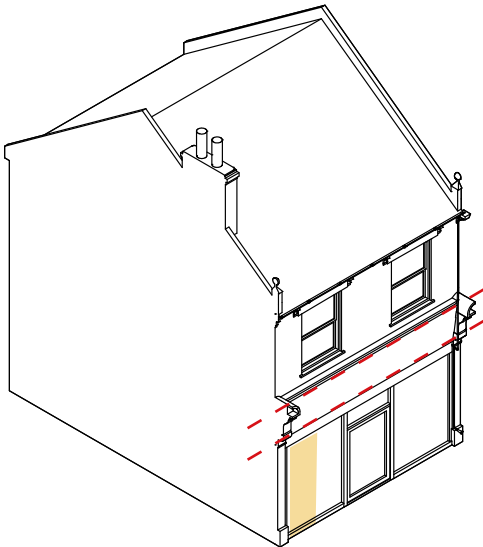
Avoid overwhelming the scale of the existing terrace

- The existing terrace is low in height relative to the street width, but forms an important gateway into the town centre from the south.
- Roof extensions should use materials that contrast with the lower façade to avoid distorting the proportions of the existing building.
- Where full width extensions are proposed, party walls should be raised to make it simple for adjoining owners to extend upward.
- Single storey extensions should remain within the height of the existing roof ridge where possible.



Continue the simple symmetry of existing façades.

- Align new glazing with first floor windows.
- Preserve the line of the existing eaves by varying the material treatment and/or setting back from the front elevation above this point.
- Use a simple, symmetrical volume.



Create entrances that are clearly legible and reinforce the patterns of the high street at pavement level.

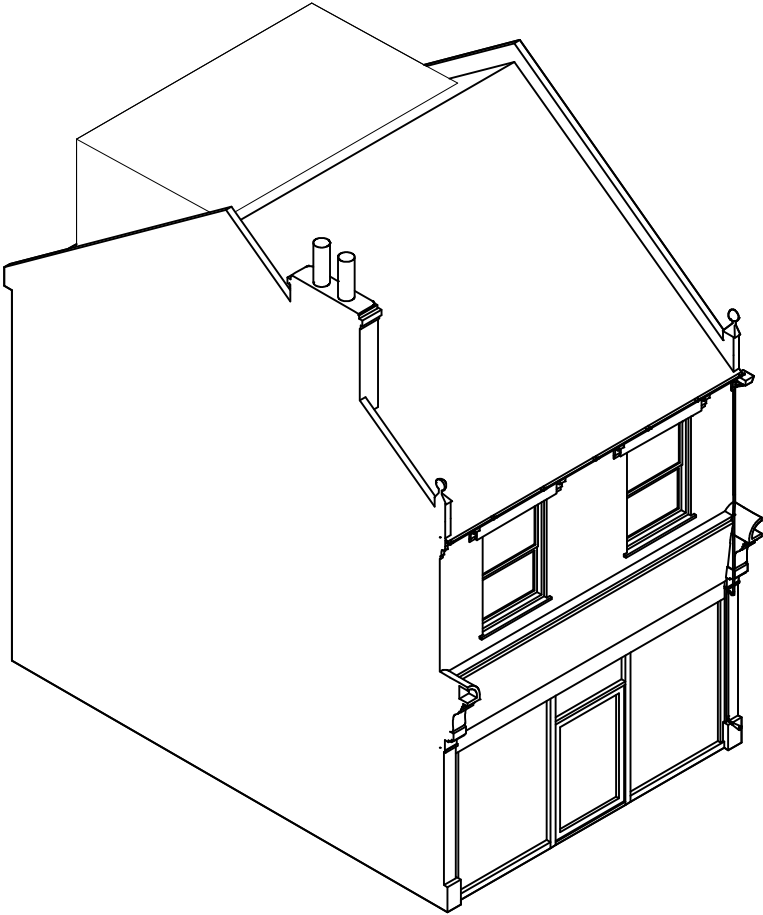
- In most cases, flats are currently accessed from the rear. Proposals for roof extension should include the creation of entrances from Church Road.
- Residential entrances should be paired either side of the party wall to establish a clear rhythm. They should not be recessed.
- Shop front fascia signs should be aligned consistently across the terrace. The top of the fascia should sit below the top of the adjacent corbel heads. The underside of the fascia sign should sit above the base of the pilaster capital.
- Where necessary, a recessed 'sub-fascia' panel can be used to make up the difference in height between the principal fascia and the top of the shop front.
- Refer to Brent's Shopfronts SPD for further detail if the shop frontage will be significantly affected by the works.



Option 1 – rear dormer

As elsewhere, rear dormer extensions are likely to be supported by SPD 2 – Residential extensions and alterations. Rear dormers should come in no less than 300mm below the existing roof ridge, and should be spaced a minimum of 500mm from the party walls.

A material treatment which establishes a clear contrast to the existing brickwork, e.g. standing seam metal or timber cladding, will ensure that the dormer does not distort the existing building's proportions.



Example: Roof extension in Edinburgh by Konishi Gaffney Architects. Bold, simple volume using standing seam metal establishes a sympathetic contrast with the existing building.

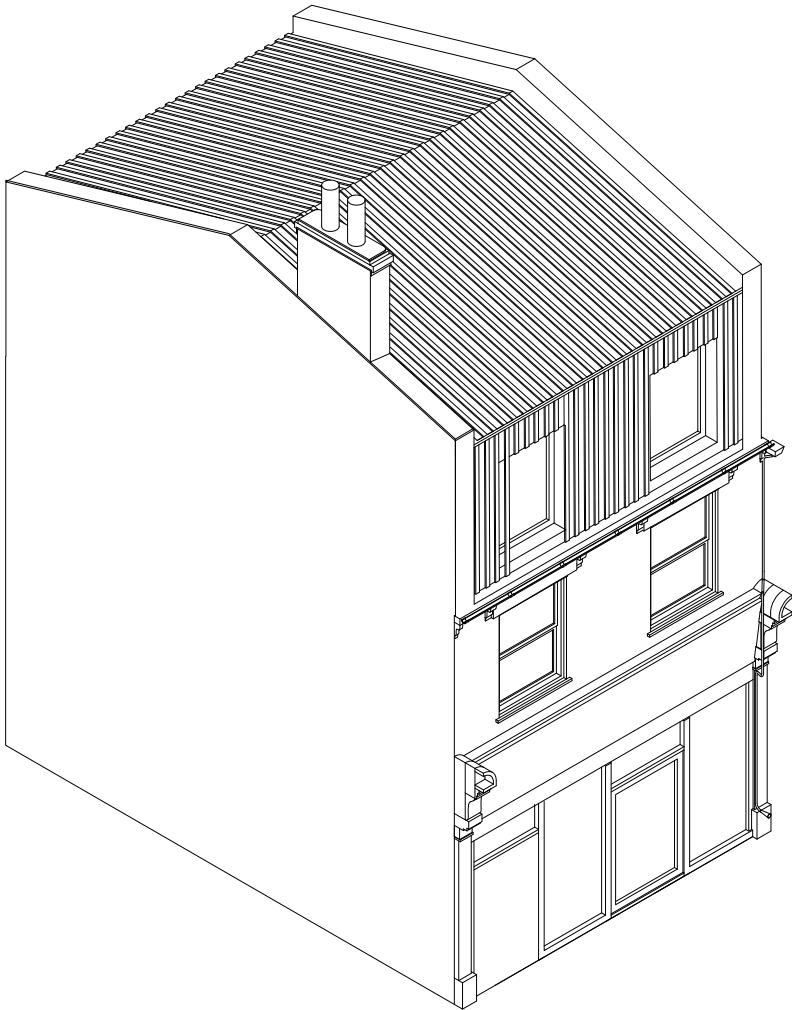


Option 2 – full width extension

In many cases a full roof extension is likely to be the best means of achieving a significant increase in residential accommodation. While the existing façades are not heavily ornamented, and there is no existing parapet at the front eaves, the existing datum should be preserved by using a contrasting material with a contemporary treatment to the roof extension.

Extensions should terminate at the principal rear building line, and not follow the rear outrigger to avoid impacting on daylight to neighbouring windows. The height of the extension should be minimised by using a flat or gently pitched roof. Party walls and existing chimney stacks should be raised in red stock brick with precast coping to match the existing to avoid compromising the potential for neighbouring extensions.

Composition of the roof extension should favour simple volumes which respect the symmetry of the lower elevations. Where new or increased residential accommodation is proposed, it is essential that direct access from the high street is provided adjacent to but clearly distinguished from the shop frontage.



Example: Development in Dalston by Marta Nowicka. Simple, low profile volume in timber shingle contrasts gently with the brick wall below. Openings align between floors for an ordered composition.



Example: Windsor Road house by Russell Jones Architects. Low profile volume in contemporary vertical timber cladding does not distort proportions of existing wall to street.

3.0

Roof extensions

3.4

Type 4



Within the Church End Growth Area Masterplan, the properties which make up type 4, together with the grand former bank and free house on the corner with Ilex Road, are identified as opportunities for significant residential intensification (up to 3 storeys). This is because, as single storey structures, they are significantly lower than the adjacent buildings, and they occupy a prominent position on the high street.

The scale and specificity of the development opportunity here mean that generic design guidance cannot be given. In general, however, new development should seek to retain existing historic façade features at low level. This is best complemented by a contemporary approach at high level that will allow for a clear reading of the original historic building fabric.

Development to upper stories should follow the building line of the adjacent Victorian terrace (type 1), which sits back from the projecting shop frontages. This could allow for retention and restoration of the existing parapet balustrade.



Example: Alex Monroe Studio, Southwark, by DSDHA. Extension to single storey retail unit picks up on eaves and window heights of adjoining terrace, uses contemporary material treatment to achieve clear distinction from host building.

Redevelopment options

Alongside opportunities for immediate improvements to public realm and ‘meanwhile’ activation opportunities, the Church End Growth Area Masterplan sets out an approach to development in the town centre on a ‘site-by-site’ basis. As illustrated (right), development of each plot in the town centre by individual landowners could result in a number of new homes approaching the targets for the site allocation set in Brent’s emerging Local Plan.

This approach, as well as avoiding any requirement for complex land assembly, aims to preserve the historic rhythm and pattern of the high street by retaining a fine grain of commercial frontages at ground level. In addition, sympathetic development in this location could help knit large development on the market site into the high street context.

This document sets out approaches to achieving a design which is compliant with planning policy and building regulations, while giving an indication of potential capacity for residential capacity on each site.

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4.3 BSSA3: Church End Local Centre

4.36 Preferred Option (BSSA3-B) - Site-by-site redevelopment

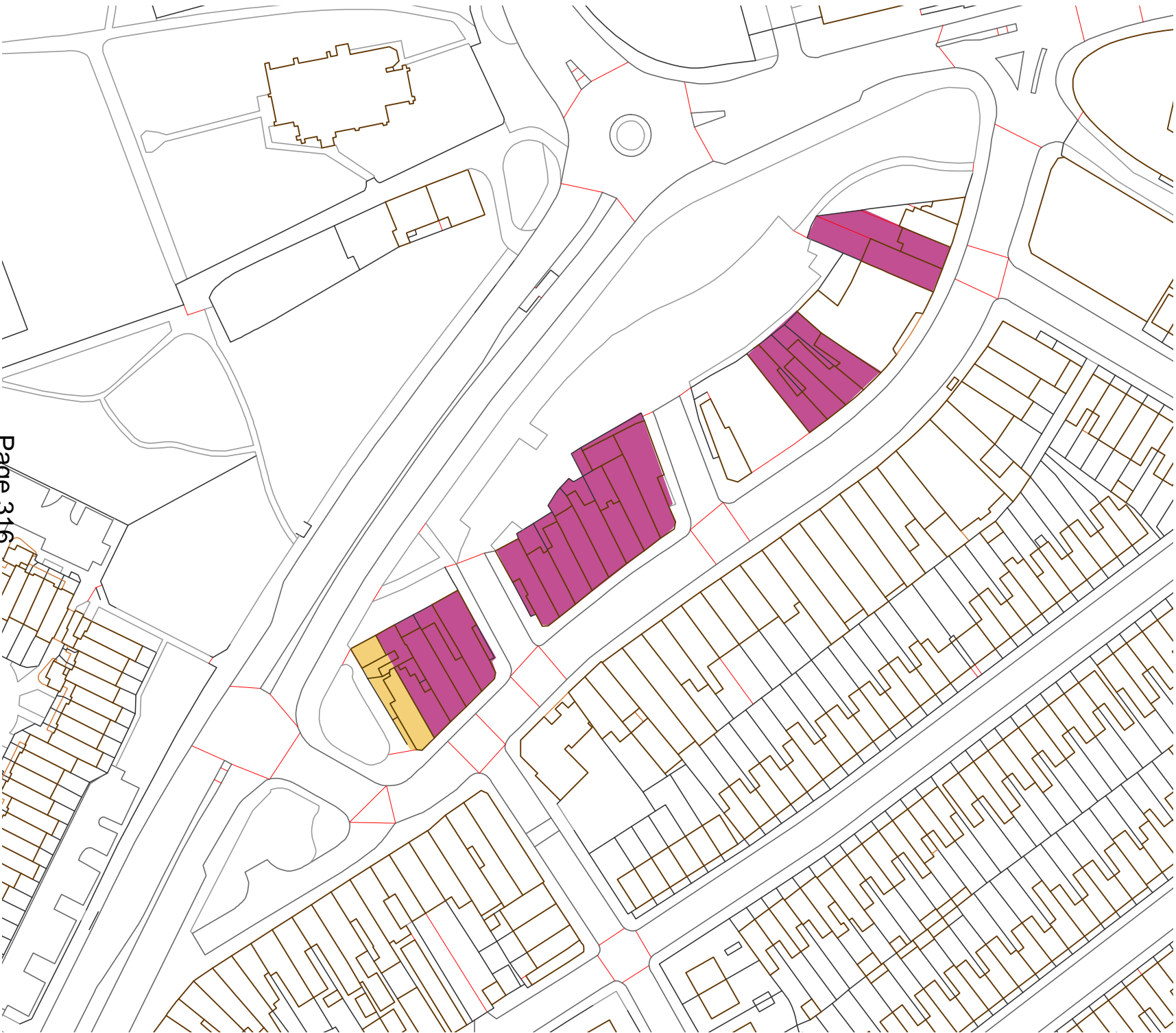


In addition to the 99+ homes delivered as part of preceding planning application around the new Market Square, this option sets out the scenario where new housing and other town centres are delivered through a site-by-site approach to development and intensification.

This reflects the fragmented ownership across the town centre and requires an incentive-based approach that encourages individual landowners to extend their properties to provide additional housing.

Please see Design Guidance for town centre for further explorations on how site-by-site development can occur in strategic and cohesive manner.

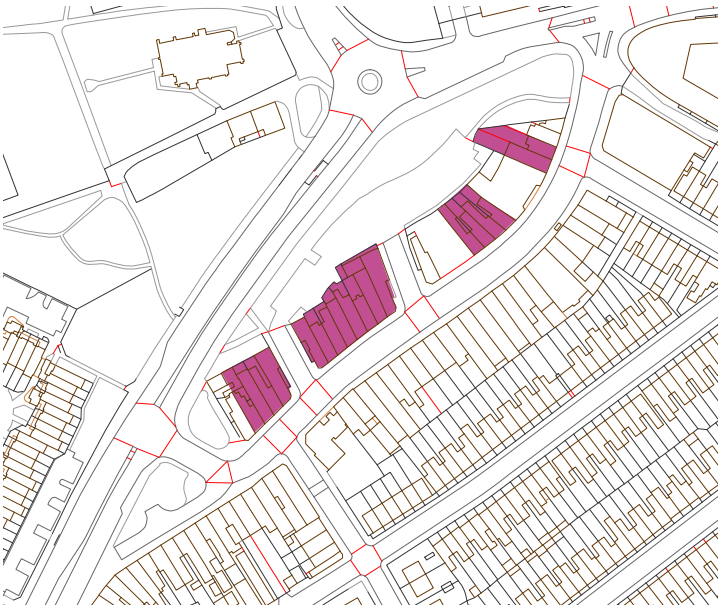
Proposed:
Total floorspace (developed sites + Catalyst offices): 9,429 m²



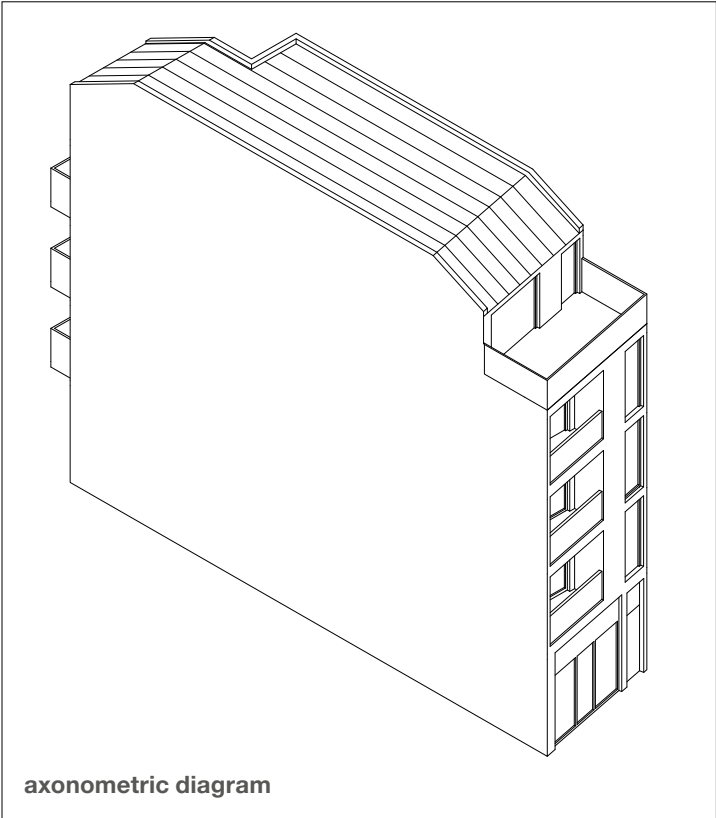
The fabric of the northwest side of the high street is formed largely by examples of type 1 (see above), i.e. ornate three-storey shopping parades at the northeast, with heavily modified examples of a two-storey yellow stock brick typology to the southwest. Many are in poor condition.

The majority of plots are around 5.2 meters wide and, following development of the market place site, will be accessible only from Church Road (i.e. no direct rear access). These plots constitute a typical high street plot typology (type 1).

At the southwest end of the high street, plots are slightly wider, on average somewhat deeper, and will retain access from the rear (north) following development of the market place site. The furthest southwest plot presents an extensive flank onto existing public space, and is considered here as a distinct typology.



Context plan



The Church End Growth Area Masterplan identifies that five storey development may be considered appropriate in this location.

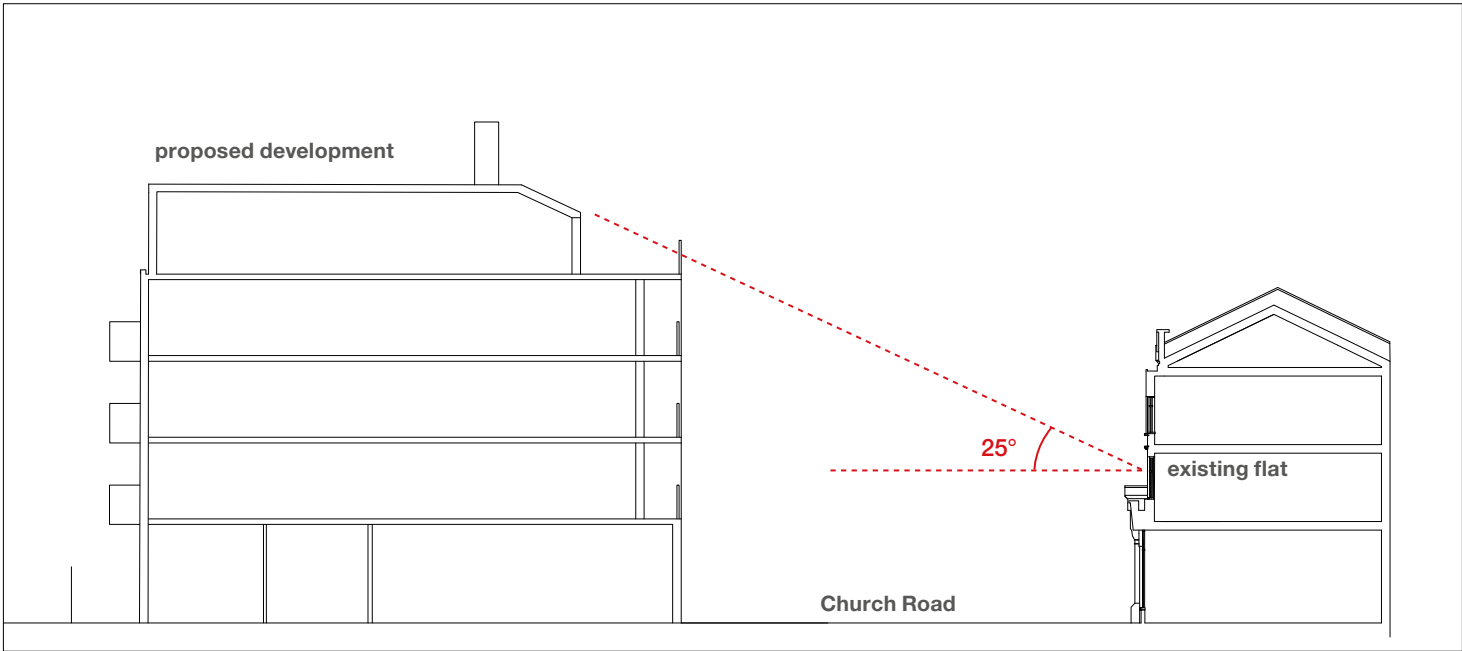
A small commercial unit (E or F) will create an active frontage at street level. Access to residential units should be directly from Church Road via a clearly legible dedicated entrance that is subservient to the shop front.

Storey and eaves heights should relate to the existing where possible (i.e. where neighbouring type 1 units) while glazing should follow a simple, repeated alignment between floors. At lower level, shop frontage and fascia heights should relate to the original proportions of the adjacent Victorian typologies.

While detailed daylight studies have not been carried out as part of this study, the diagram (below left) illustrates that a set back fifth storey and a carefully detailed roof terrace balustrade can be incorporated without unacceptably impacting daylight to flats across the high street. However, as rear extensions and outriggers vary widely across the terraces, detailed assessment of the impact of new development on neighbouring rear windows in accordance may be required.



▲ Example: Redchurch Townhouse in Shoreditch by 31 44 Architects. Commercial unit at ground floor is carefully aligned to neighbouring existing buildings, while upper storeys and glazing relate closely to adjacent buildings. Contemporary material treatment is distinct from historic neighbours.



typical section across high street demonstrating approach to compliance with BRE guidance on daylight



◀ Example: Blackfriars Road by De Matos Ryan. Eaves height relates closely to original structures, while upper storeys are set back to minimise impact at street level.



At ground floor, a modestly scaled commercial unit should retain an active frontage with extensive glazing onto Church Road. Residential entrances should be paired across party walls to match the existing arrangement.

Flats are accessed via a single shared stairwell. Compliance with the Building Regulations Part B (Fire) is likely to require the provision of protected lobbies to each floor, ventilated via a smoke shaft rising above roof level. Developers are advised to seek the input of a specialist fire safety designer. It should be noted that four storey development may benefit from consideration as a small, single stair building under the Regulations, enabling a simplified arrangement.

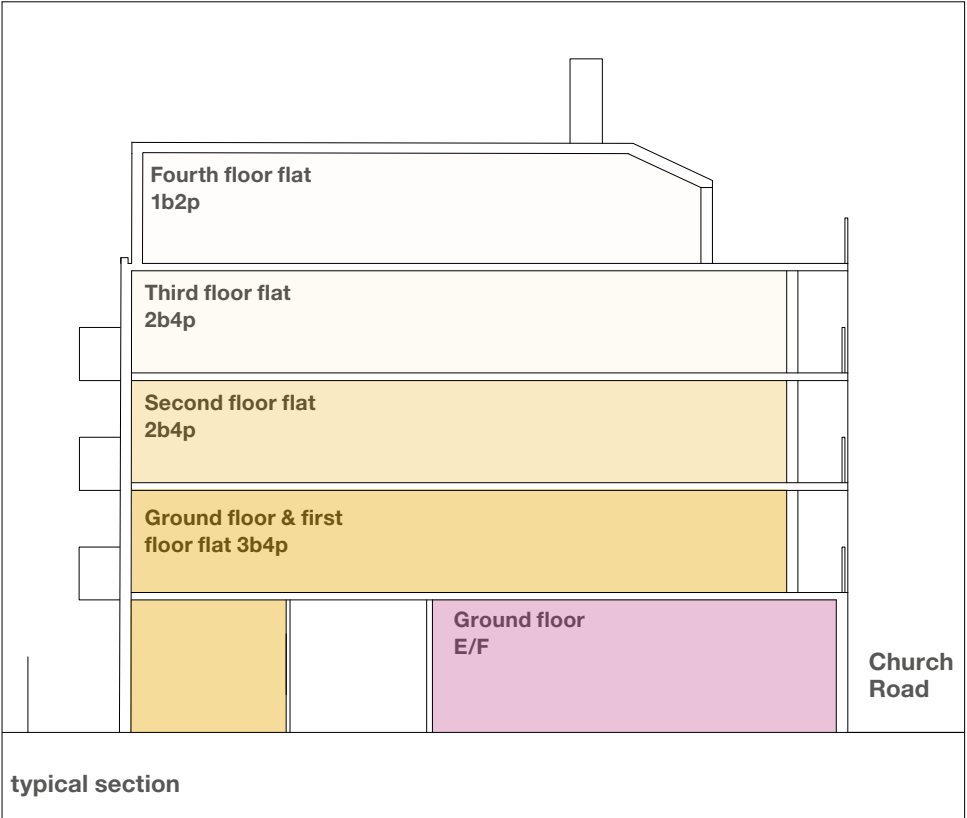
Cycle storage is accommodated to the rear of the stairwell via a fire protected lobby. If site arrangement allows, e.g. end of terrace plots, it may be desirable to seek an arrangement where cycle storage is accessed externally.

Refuse collection follows Brent’s standard method for flats above shops, with recycling and general waste sacks placed directly outside on the high street pavement within strict hours for collection.

At first floor, each flat is accessed via a protected fire lobby. Flats to upper storeys are dual aspect, and achieve private amenity space to minimum GLA standards through balconies. Living/kitchen/dining areas are placed to the front of the property, benefiting from southern exposure, while bedrooms are positioned to the rear furthest from street noise.

The drawn arrangement seeks to maximise residential accommodation by including an additional bedroom to the first floor flat at ground level, together with a private garden. An approach with a full commercial ground floor could also be appropriate.

Daylight is brought into the deep floor plans via an inset to the north elevation. To maximise the effectiveness of this strategy, the typology should be mirrored across the party wall.

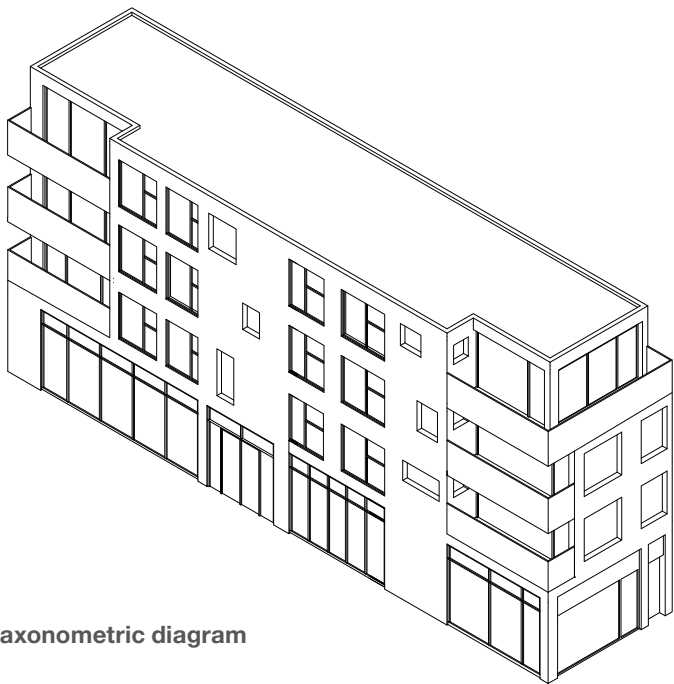


Type of flat	Total	Bedroom 1	Bedroom 2	Bedroom 3	Living/ kitchen/ dining	Storage	External amenity space
Ground floor E/F	36m ²	-	-	-	-	-	-
Ground floor & first floor flat 3b4p	82m ²	12m ²	11m ²	11m ²	29m ²	2.5m ²	18m ²
Second floor flat 2b4p	71m ²	13m ²	12m ²	-	29m ²	2m ²	7m ²
Third floor flat 2b4p	71m ²	13m ²	12m ²	-	29m ²	2m ²	7m ²
Fourth floor flat 1b2p	60m ²	14m ²	-	-	31m ²	1.5m ²	13m ²

schedule of accommodation



context plan



axonometric diagram

At the southwest end of the high street, two larger plots will retain access from the north following development of the marketplace site. Here, a typology which addresses both the high street and the dual carriageway is possible.

At the ground floor, commercial (E or F) uses bring active frontages to the high street and onto the dual carriageway, where ground floor residential accommodation is likely to feel unpleasantly exposed.

Above, three storeys of dual aspect two bedroom flats are accessed from the high street via a shared stair core. The top storey is set back from the high street to avoid impacting daylight to first floor flats across Church Road. Note that the drawn arrangement has not been subject to a full daylight study.

The plot occupies an important strategic location adjacent to open space which is identified for public realm improvements by the Masterplan. Ground floor units should positively address open space through this side elevation, and will be particularly well suited to community and cultural uses which can establish a strong relationship with the open space.





ground floor

first floor

second floor

third floor

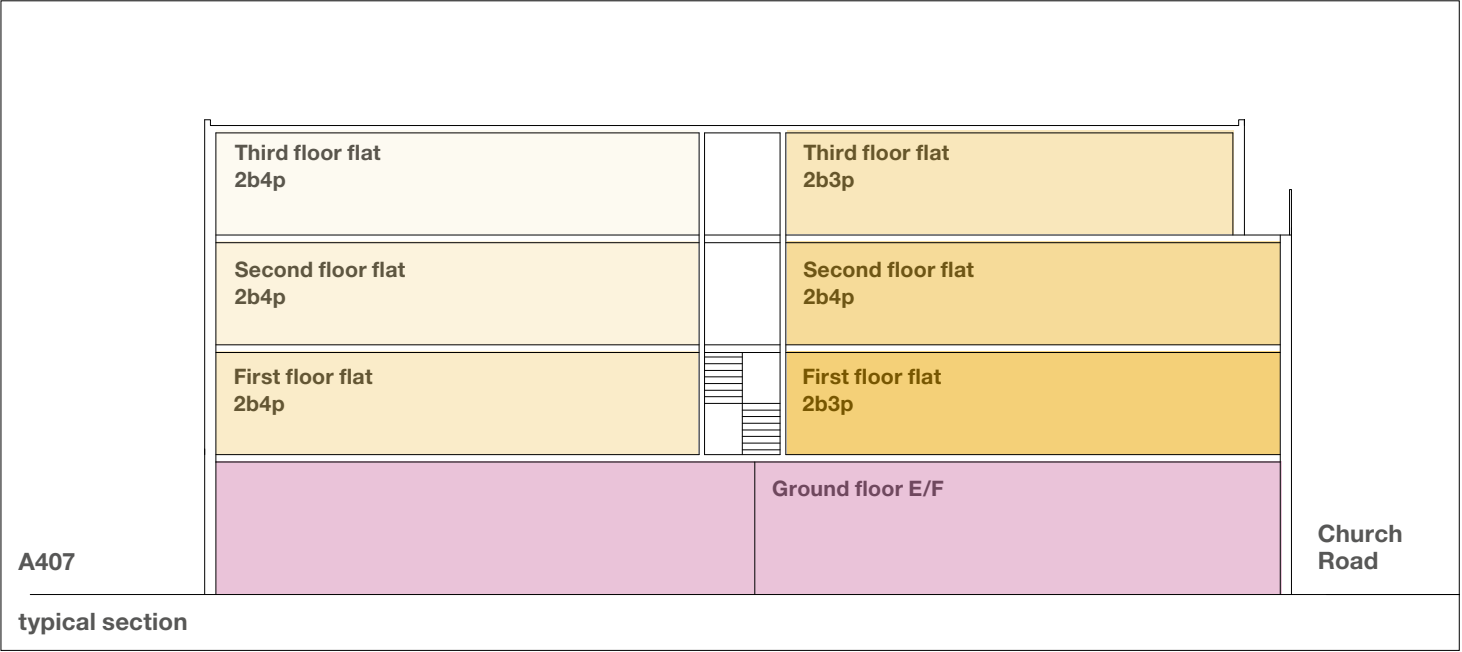
At ground floor level, a large commercial unit extends the full depth of the plot. If considered more appropriate to local demand, this can be subdivided into two separate units, one facing the high street and the other toward the dual carriageway.

Flats are accessed from the high street via a door adjacent to the shop front into a shared stairwell. Doors should be clearly demarcated and paired around the party wall to continue the rhythm of the high street. Cycle storage is accessed via a fire protected lobby.

Refuse collection follows Brent’s standard method for flats above shops, with recycling and general waste sacks placed directly outside on the high street pavement within strict hours for collection.

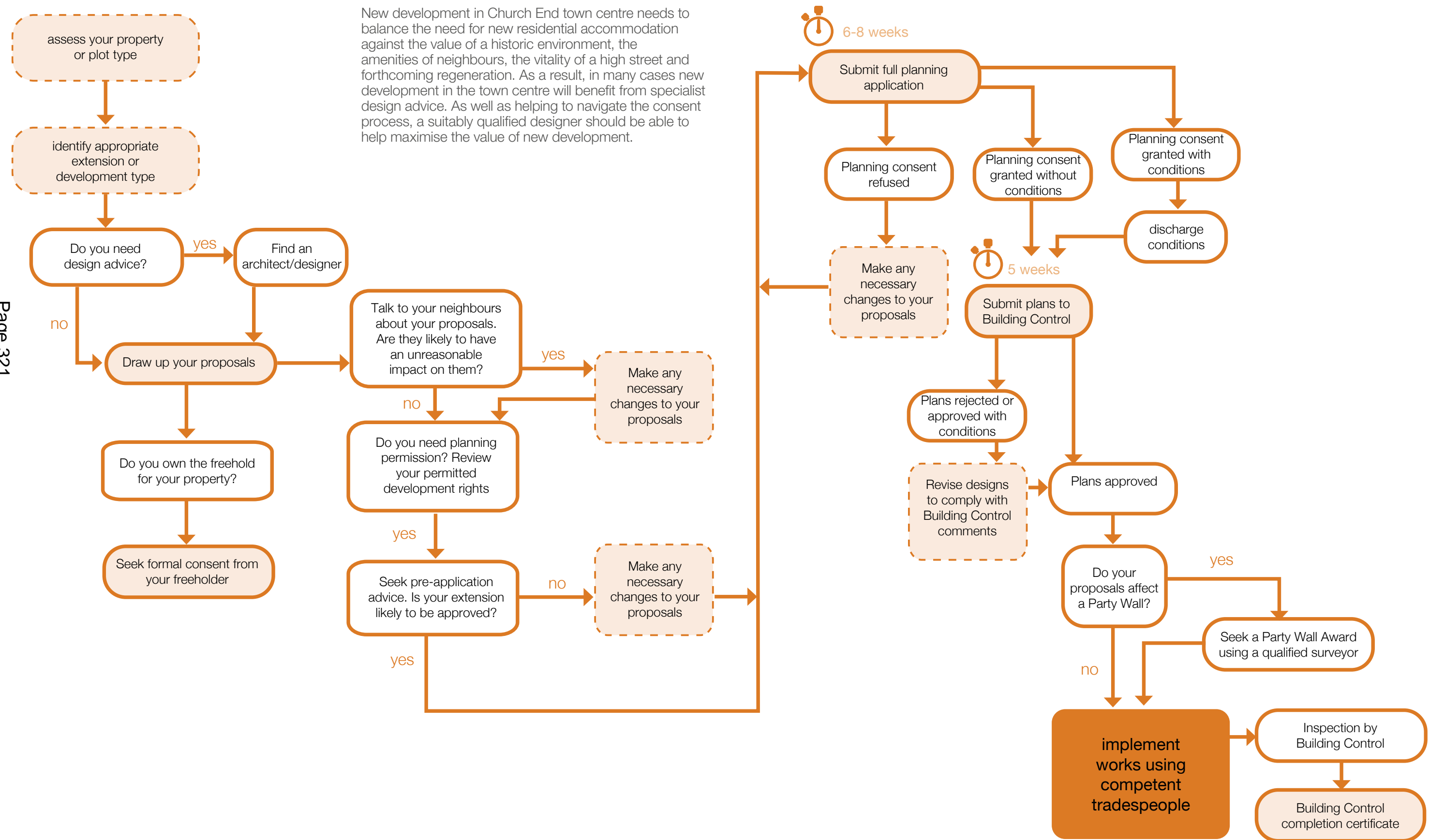
Flats at upper level are accessed via a fire protected entranceway. The shared stair must be ventilated at the head via an openable vent of at least 1m².

- 2 no. flats per floor, with dual aspect living/kitchen/ dining spaces
- amenity space provided via balconies, which are oriented towards potential new public realm at the west of the town centre
- detailed daylight assessment is likely to be required to evaluate impact on rear windows to neighbouring flats, particularly if mid-terrace plots have not been re-developed



Type of flat	Total	Bedroom 1	Bedroom 2	Living/ kitchen/ dining	Storage	External amenity space
Ground floor E/F	140m²	-	-	-	-	-
First floor flat 2b3p	67m²	12m²	10m²	30m²	2m²	7m²
First floor flat 2b4p	71m²	12m²	12m²	31m²	2m²	7m²
Second floor flat 2b4p	72m²	12m²	12m²	30m²	2m²	7m²
Second floor flat 2b4p	71m²	12m²	12m²	31m²	2m²	7m²
Third floor flat 2b3p	67m²	12m²	10m²	30m²	2m²	14m²
Third floor flat 2b4p	71m²	12m²	12m²	31m²	2m²	7m²

schedule of accommodation



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EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Church End Growth Area (CEGA) Masterplan and Supplementary Planning Document (SPD)
DEPARTMENT:	Regeneration & Environment
TEAM:	Regeneration
LEAD OFFICER:	Bruna Varante, Principal Regeneration Officer
DATE:	27/03/2023

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.

Brent adopted Local Plan (2019-2041) identifies Church End as a Growth Area. It requires a Masterplan to facilitate and unlock its regeneration due to its many complex challenges. The Church End Growth Area (CEGA) Masterplan is proposed to:

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

Intensification of industrial sites and co-location with residential uses is proposed to deliver:

- Fit for the future industrial space for local businesses and emerging sectors including film, music, media and food production;
- Opportunities for employment, skills and training for local people;
- A minimum of 1,300 new high quality homes, including affordable homes, family-sized dwellings, and specialist accommodation for older people;
- A revitalised town centre and outdoor market with a diverse offer;
- A range of new community and creative spaces that support interaction and community cohesion;
- New open spaces, incorporating play for a range of ages including young people and teenagers, alongside opportunities for food growing and access to nature;
- A high quality environment that is safe and accessible to everyone;
- Streets that encourage walking and cycling over private vehicle use, and better connect Church End to the surrounding area;
- A place that achieves the highest standards of sustainability and supports a low carbon circular economy.

The Masterplan will be a Supplementary Planning Document (SPD) to Local Plan policy BSGA1. To ensure the SPD remains relevant over the Local Plan period, the Council will be expected to review the document every 5 years.

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

The CEGA Masterplan SPD will affect various groups of people who live and work in Church End, including existing and future residents, community groups, businesses, landowners, developers, ward members and providers of social infrastructure. Further details are set out below:

About Church End Residents

According to the 2011 census, the Church End community is composed of 66% BAME groups, mainly Somali and African Caribbean communities. Latest 2022 census data shows the local ward population has increased 5% over the past 10 years and is now composed of 69% BAME groups. The area also has an average income lower than Brent and London averages, with Universal Credit Claims higher than in Brent and in London (Department for Work & Pensions).

The CEGA Masterplan SPD is proposed to facilitate and promote the delivery of new housing including new affordable housing, workspaces, green spaces, as well as community facilities, and to ensure disadvantage groups can access more homes, employment & training and high quality and inclusive public spaces.

Young People

The CEGA Masterplan SPD highlights the importance of supporting local young people's growth and development as well as identifying the potential to capitalise on the creative talent by securing dedicated spaces for creative development.

Elderly People

The CEGA Masterplan SPD identifies the local need for specialist housing dedicated to older people and sets out a number of improvements to ensure accessibility and mobility are enhanced and maximised within the area.

Businesses

Whilst redevelopment takes place, some businesses might need to be relocated to alternative premises. A *Decant and Business Relocation Strategy* identifies the more and less actively used employment sites within the area, and sets out phasing and measures to help to ensure that businesses are protected and supported while redevelopment takes place.

Service providers of social infrastructure and their service users

CEGA Masterplan SPD identifies locations for social infrastructure, including a Secondary School, a potential location for a Health Facility (subject to agreement with the Clinical Commissioning Group (CCG)); and a number of community spaces, pocket parks and areas of play, as well as improvements to the existing provision.

Users, developers and registered providers of social/intermediate/affordable housing

The CEGA Masterplan SPD provides planning and development guidance to facilitate the delivery of at least 1300 new homes across Church End, highlighting the percentage of affordable homes that should be provided within the different site allocations, and which will later be managed by housing associations and others.

London Borough of Brent departments

Including staff from Planning, Housing, Property, Highways, Public Health, Customer & Digital Services (including Revenue and Debt), Environment Services, Regeneration, Growth & Employment.

External and Statutory Agencies

Environment Agency, Greater London Authority, Natural England, Historic England, Thames Water, Transport for London.

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

Yes, there is relevance to the council's public sector equality duty, and due regard to such is paid in drawing up this equality analysis.

The proposed CEGA Masterplan SPD will guide substantial regeneration and growth planned to be delivered in the borough over the next 20 years, and therefore should aim to remove or minimise disadvantages which are connected to characteristics of protected groups. Consistent with the three aims of the general equality duty, the CEGA Masterplan SPD aims to eliminate unlawful discrimination, advance equality of opportunity, and foster good relations between different groups.

Affordable Housing

The CEGA Masterplan SPD plans to meet some of the affordable housing needs of the borough, including the needs of protected groups, through for example wheelchair accessible and adaptable housing and supported older persons housing provision. It has a minimum target of 35% affordable housing and when viable 50% affordable housing, with a 70:30 social to intermediate split.

Industrial Space & Affordable Workspaces

The intensification of industrial uses and provision of employment spaces/affordable workspaces is expected to advance equality of opportunity, by giving those with less financial security the opportunity to access employment in the CEGA.

Employment Opportunities

By securing new modern and fit for purpose employment spaces, we seek to attract higher value jobs to the area for local people, as well as training and apprenticeship opportunities.

Public and Green Spaces

Public consultation identified a lack of space where all groups in the community comes together, and the SPD seeks to secure new community space and ensure public spaces are inclusive and designed to promote social interaction between different groups.

Active Travel

The CEGA Masterplan SPD also aims to secure enhanced, safe, accessible and connected public realm and green open spaces for all user groups and further provisions for safe walking/cycling routes that will have positive impacts on all groups.

Partnership Development

To bring about comprehensive redevelopment in the area, partnerships are required between landowners and developers, the Council, and the existing and future communities. These partnerships also have the potential to facilitate collaboration between different communities, and in realising the objectives of the CEGA Masterplan SPD foster good relations and create a sustainable and inclusive neighbourhood.

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

Characteristic	IMPACT		
	Positive	Neutral/None	Negative

Age	X		
Sex	X		
Race	X		X
Disability	X		
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

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

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

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

Brent's adopted Local Plan (2019-2041) identifies the CEGA as one of 8 growth areas, viewed as the most sustainable spatial expression for growth, exploiting brownfield land, good access to public transport and higher densities to deliver the majority of the future housing and employment needs of the borough, and was extensively consulted upon and subject to its own equality impact assessment.

The CEGA Masterplan SPD is an opportunity for Brent Council to bring about the physical and socio-economic regeneration of not only CEGA, but also build positive relationships with surrounding neighbourhoods such as Neasden, Harlesden and Willesden Green. The CEGA Masterplan SPD conforms to both the adopted Brent Local Plan (2019-2041) and the new London Plan.

External Stakeholder Engagement – Prior to Statutory Consultation

The CEGA Masterplan SPD has been developed based on robust analysis and extensive stakeholder engagement undertaken during 2021, including:

- Interviews with community groups, local charities, housing associations, faith groups and businesses;
- An online platform reaching out to a greater number of stakeholders, residents, businesses, community groups, etc;
- A short documentary developed by a local youth-led charity;
- Interactive workshops with community groups;
- Interactive workshops with employment and affordable workspace stakeholders;
- Spring outdoor event;
- Activity with a local primary school;
- Targeted discussions with major landowners;
- Autumn exhibition;
- Online survey;
- Meeting with targeted groups.

Overall, almost 1.000 people participated in the process.

Internal Stakeholder Engagement

The development of the Masterplan was also advised by the following Council's teams: Planning; Transport Planning; Partnerships; Property; Capital Programme; Early Years; Employment, Skills and Enterprise; Libraries; Culture; Parks; Highways and Environmental Services.

Statutory Consultation

The CEGA Masterplan SPD was subject to 7 weeks of formal consultation from 22 September 2022 to 10 November 2022. This was in accordance with the Regulations and the Council's Statement of Community Consultation (SCI). Statutory public consultation provided further opportunities for engagement with partners, stakeholders, local residents, businesses and communities.

Information about the CEGA consultation has reached over 16,000 people via the Council's social media. There were 1802 hits to the dedicated CEGA website. 627 people in total, including residents, statutory consultees, and other stakeholders attended the four consultation events. 192 people have engaged in dedicated one-to-one discussions with officers about the plans. 97 people completed the surveys available in our events and online via our consultation portal. 19 people/organisations issued formal consultation responses.

In total, 116 responses have been received on the draft Masterplan SPD during the 7-week consultation period. Responses are broadly positive and supportive of the overarching vision for regeneration set out in the draft CEGA Masterplan SPD.

Baseline information

The following sources have informed the CEGA Masterplan SPD and this equality analysis:

Population & Equality

- Adopted Brent Local Plan (2019-2041) and evidence base, London Borough of Brent
- Demographics analysis London Borough of Brent Research & Intelligence Team
- Census 2011 and Census 2022, Office National Statistics

Housing

- Strategic Housing Market Assessment (SHMA), 2018, ORS
- Adopted Brent Local Plan (2019-2041) and evidence base, London Borough of Brent
- Brent Inclusive Growth Strategy (2019-2040), London Borough of Brent
- CEGA Masterplan Viability Assessment (2021), BNP Paribas

Health & Well-Being

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

Local Economy

- Brent Employment Land Demand Study, 2015, ORS
- Brent Affordable Workspace Strategy, 2020
- Brent Employment, Skill and Enterprise Strategy 2015-2020

Education

- Joint Strategic Needs Assessment (JSNA), 2019/2020, London Borough of Brent
- Brent School Place Planning Strategy (June 2017 refresh), 2019-2024, London Borough of Brent

Land use

- Brent Borough Plan (2022)
- Brent Meanwhile Use Strategy (2021)
- Brent Affordable Workspace Strategy (2020)
- Brent Poverty Commission Report (2020)
- Brent Black Community Action Plan (2020)
- Brent Inclusive Growth Strategy (2019-2040)
- Brent Infrastructure Delivery Plan (2019)
- West London Employment Land Evidence (2019)
- Brent Indoor Sports & Leisure Facilities Needs Assessment (2018)
- Brent Strategic Housing Market Assessment (2018)
- GLA Industrial Intensification and Co-location Study (2018)

Movement and Connectivity

- Brent Long Term Transport Strategy (2015-2035) (2021 Review)
- TfL Mayor's Transport Strategy (2018)
- TfL Vision Zero Action Plan (2018)

Green and Open Spaces

- Brent Health and Wellbeing Strategy (2022-2027)
- Brent Food Growing and Allotment Strategy
- Brent Open Space, Sports and Recreation Study (2019)
- Brent Council Indoor Sports and Leisure Facilities Needs Assessment (2018)
- The London Food Strategy (2018) (GLA) GLA Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
- GLA Urban Greening Factor LPG (draft) (2021)
- Sport England's Design Guidance
- Natural England Biodiversity Metric, Small Sites Metric (SSM) and Environmental Benefits from Nature Tool (EBNT)
- Fields In Trust Guidance for Outdoor Sport and Play (2020)

Building Design and Architecture

- Brent Design Guide SPD1 (2018)
- Brent Tall Buildings Strategy (2019)
- Characterisation and Growth Strategy LP (2022)
- Optimising Site Capacity: A Design Led Approach LPG and Housing LPG (2022)

Climate Change and Sustainability

- Brent Climate & Ecological Emergency Strategy (2021-2030)
- West London Strategic Flood Risk Assessment
- West London Waste Plan (2015)
- GLA Air Quality Positive LPG (2022) (draft)
- GLA Air Quality Neutral LPG (2022) (draft)
- GLA Be Seen energy monitoring LPG (2021)
- GLA Circular Economy statements LPG (2021) (draft)

- GLA Circular economy statements LPG (2020)
- GLA Using Green Infrastructure to protect people from Air Pollution (2019)
- GLA London Environment Strategy (2018)
- GLA London Sustainable Drainage Action Plan (2016)
- GLA The Control of Dust and Emissions During Construction and Demolition SPG (2014)
- Transport for London SUDS in London: A Guide (2016)
- Urban Design for London Designing Rain Gardens: A Practical Guide (2018)
- Homes England Building for a Healthy Life (2020)
- CIRIA The SUDS Manual (2015)

Statutory Consultation

The CEGA Masterplan SPD will be subject to statutory public consultation for 6 weeks in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement. This will provide developers and local businesses, residents and communities with the opportunity to provide input into the Masterplan SPD, with the council considering and responding to all representations received.

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

AGE	
Details of impacts identified	<ul style="list-style-type: none"> • Affordable Housing/Workspace: Meeting some of the borough's affordable housing and local employment needs is considered likely to have positive impacts on all community groups and ages, especially those with socio-economic disadvantaged background as Church End is known for overcrowding issues. • Employment Opportunities: By securing new modern and fit for purpose employment spaces, we seek to attract higher value jobs to the area for local people, as well as training and apprenticeship opportunities. • Specialist Housing: Older people's accommodation is sought across the CEGA to meet local needs for such identified in the Strategic Housing Market Assessment (SHMA). • Housing Unit Size: Larger family accommodation is sought across the CEGA to meet the need for such identified in the SHMA and address the current known issues of overcrowding in the borough. • Health, mobility and wellbeing: Brent is the 4th most inactive borough in London, and nearly 1 in 5 adults in Brent are obese, with this trend set to increase. Provision for enhanced public realm and 'Healthy Streets', publicly accessed green open spaces and an improved movement and green spaces network will have a positive impact on all groups and ages.
DISABILITY	
Details of impacts identified	<ul style="list-style-type: none"> • Accessible Housing: Provisions for accessible housing which are DDA friendly and provide blue badge parking will be beneficial for Disability groups. 10% of homes are also proposed to be accessible. • Infrastructure: Disabled people might also expect to benefit from investment within the movement infrastructure as a number of crossings, junctions and public/green spaces have been identified for improvement and for development.

	<ul style="list-style-type: none"> • Parking; the plan recognises the need to secure parking in new development for people with disabilities
RACE	
Details of impacts identified	<ul style="list-style-type: none"> • BAME Communities: Given Church End's demographics, with BAME communities (69.6%), mainly Somali and African Caribbean, regeneration and investment into the area is likely to benefit ethnically diverse residents, community groups and businesses. • Business Relocation: In the short term, there is a potential for the CEGA Masterplan SPD to disproportionately affect Somali and African Caribbean residents, as businesses within the industrial sites are relocated during redevelopment. To mitigate that, the Council undertook pre-statutory consultation with the business community and developed a Decant and Business Relocation Strategy to minimise impacts. In the longer term the Masterplan SPD proposes improved spaces for businesses and more opportunities for commerce and enterprise. After businesses and residents' feedback regarding the Church End outdoor market, original plans to relocate to Neasden Lane during the car park (BSSA3) redevelopment have been amended to allow a more localised relocation on Church Road. We will continue to monitor and engage with businesses and residents to migrate potential negative impacts. • Safety: Increased surveillance and high quality public realm is likely to provide increased safety, an issue which particularly impacts BAME communities.
SEX	
Details of impacts identified	<ul style="list-style-type: none"> • Safety: Increased surveillance and high quality public realm is likely to provide increased safety, an issue which particularly impacts women.
SEXUAL ORIENTATION	
Details of impacts identified	<ul style="list-style-type: none"> • No identified impacts upon groups with the protected characteristics of Sexual Orientation is identified in this equality analysis.
PREGANCY AND MATERNITY	
Details of impacts identified	<ul style="list-style-type: none"> • Community Spaces: Increased community spaces will offer more opportunities for accessing services and support. • Public/Green Spaces: Connected network of safe and accessible public, green and play spaces will also provide more opportunities and support for women in pregnancy and/or with children.
RELIGION OR BELIEF	
Details of impacts identified	<ul style="list-style-type: none"> • Religious Institutions: highlight demand for parking, including disabled parking, to access and attend religions premises and events. The Masterplan emphasises the need for new development to provide sufficient inclusive parking to access community facilities and disabled parking. The Masterplan also identified options for potential future lower traffic environments in the Church End areas and any future such proposals and consultations would need to consider potential impacts on religious premises in the areas.

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

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

No.

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

The CEGA Masterplan SPD has been developed over 2021 through ongoing consultation with a wide range of key stakeholders, with representatives of those who will be affected by the proposal, including BAME, young people and people with disabilities. Public participation was, at times, limited by the coronavirus pandemic, however, the Council mitigated these circumstances by making use of a hybrid approach for engagement which included online and physical participation events, over a 10 month period, almost 1,000 participated of the process. The Council is committed to re-engaging the local community throughout the statutory public consultation process by summer 2022. This equality analysis will be updated following further consultation.



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

N/A

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

N/A

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

To ensure the CEGA Masterplan SPD remains relevant over the Local Plan period, the Council will consider review of the document after 5 years. Notwithstanding this potential for review, the guidance must be sufficiently flexible and capable of responding to changes in market demands and commercial and economic circumstances. These are factors that can change in a short space of time.

The CEGA Masterplan SPD also provides information on measures that can be taken for future-proofing design in a changing climate and the vital transitioning to net-zero carbon. New development must embody the principles of sustainability and adapt to future changes, and this is particularly relevant as the CEGA is planned to be delivered over a period of approximately 15-20 years.

SECTION C - CONCLUSIONS

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

The strategic objectives of the CEGA Masterplan SPD are to deliver new homes, jobs and infrastructure and in so doing support good growth, deliver high quality placemaking, and ensure social, economic and physical regeneration brings forward transformational changes, contributing to a vibrant and inclusive neighbourhood.

The CEGA Masterplan SPD will facilitate these objectives and help realise their ambitions for the benefit of the borough's residents, businesses and diverse communities.

The CEGA Masterplan SPD will have positive impacts on existing and new communities alike, including different groups, as it identifies a range of placemaking, environment and sustainability principles which should apply to and guide comprehensive redevelopment of the area, as well as specific positive impacts for people of different age groups and people with disabilities.

Some businesses might need to be relocated to alternative premises whilst redevelopment takes place. The Masterplan proposed a phased redevelopment approach aligned with a *Decant and Business Relocation Strategy* to support and protect businesses, including more intensively used sites for on-going industrial use.

Reducing traffic congestion and CO2 emissions is a priority for CEGA and new developments are proposed car-free or car-lite, supported by share mobility provision such as car clubs. The CEGA Masterplan however recognises the need for new development to provide inclusive car parking for people with disabilities and to access community facilities.

SECTION D – RESULT

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

D	STOP OR ABANDON THE POLICY/PROPOSAL	
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SECTION E - ACTION PLAN

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


Action	Expected outcome	Officer	Completion Date
Statutory public consultation for a minimum of 6 weeks	Review of all comments received through consultation process	BV	Sep-Nov 2022
Modification made following consultation and Equality Analysis updated	Integrate relevant comments and feedback	BV/JK	March 2023
Adoption of the CEGA Masterplan SPD	The Affordable Workspace SPD will now apply; any development proposals must take into account and adhere to the principles set out and guidance provided.	BV	May 2023
Review periodically (every 5 years)	Monitor and review equalities impacts	BV	n/a

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Bruna Varante, Principal Regeneration Officer
REVIEWING OFFICER:	Jessica Harrison, Senior Policy and Equalities Officer
HEAD OF SERVICE:	Jonathan Kay, Head of Regeneration – 27/03/2023

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 Brent	Cabinet 22 May 2023
	Report from the Corporate Director of Residents Services
Community Led Housing in Brent	

Wards Affected:	Stonebridge
Key or Non-Key Decision:	Key
Part Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
No. of Appendices:	One: Appendix 1 – Site plan of Brentfield Road
Background Papers¹:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Emily- Rae Baines - Head of Affordable Housing & Partnerships 020 8937 1131 Emily-Rae.Maxwell@brent.gov.uk Hakeem Osinaike – Director, Housing 020 8937 2023 Hakeem.Osinaike@brent.gov.uk

1. Purpose of the Report

- 1.1. Delivering affordable housing remains a high priority for the Council. With growing housing demand and the impact of the cost of living increasing pressure on Brent Residents, it is imperative the Council considers all possible avenues for the delivery of affordable housing. In 2018, a Scrutiny Report on affordable housing was produced by members and made a recommendation that the Council explore Community Led Housing (CLH) as an avenue of delivery, specifically as it favoured co-production with residents.

- 1.2. The purpose of this report is to update Cabinet with progress achieved since the Scrutiny recommendation and seeks approval to ring-fence a site on Brentfield Road for the purpose of CLH through established group, Brent Community Land Trust (BCLT).

2. Recommendations

- 2.1. That Cabinet agree to ring-fence the Brentfield Road site set out in Appendix 1 for Brent Community Land Trust for the purpose of Community Led Housing and commit to issuing a letter of intent confirming this arrangement.
- 2.2. That Cabinet agree to the principal of the Council entering into a lease agreement for nil value for the land at the Brentfield Road Site outlined in Appendix 1 subject to the following criteria being met;
- That Brent Community Land Trust have been granted planning permission for the proposed development on the site
 - That Brent Community Land Trust have secured funding for the proposed development
 - That Brent Community Land Trust can evidence the scheme's financial viability
 - That Brent Community Land Trust produce and deliver a plan for Co-production with residents living on the existing estate and ensure residents are represented throughout their decision making process, including presence on their Board.

Cabinet approval will be sought ahead of the lease being entered into.

- 2.3. That Cabinet agree the Brentfield Road Site will be ring-fenced for 12-months only from the date of the letter of intent being issued to allow the Brent Community Land Trust to seek planning and carry out a viability assessment and if the above criteria in point 2.2 have not been achieved a follow up report will be brought to Cabinet to determine whether the site will continue to be ring-fenced for CLH with Brent Community Land Trust.

3. Background

- 3.1. In 2016, the Government launched a Community Housing Fund which set out to enable communities to organise themselves and form the required structures to unlock their capacity to deliver CLH. Brent received £53K in grant funding and the Harlesden Neighbourhood Forum, in partnership with Crisis committed to utilising the grant and went on to form the BCLT. As a group, the BCLT communicated a clear ambition to unlock and deliver a CLH project within Brent. It should be noted that whilst this group was formed from Harlesden Neighbourhood Forum, the commitment is for the group to deliver CLH for Brent residents not just residents in Harlesden.
- 3.2. In 2018, a member led scrutiny of affordable housing in Brent was undertaken, this scrutiny included CLH. The report made the following recommendations:

- Brent should investigate and promote opportunities for community led housing projects, such as “Community Land Trusts” and “Self-Build” projects, which will protect homes and assets at affordable levels in line with local incomes for future generations.
- Brent should explore setting up of a CLT model on publically owned land and encourage developers to do the same.

As the BCLT had already formed and expressed a commitment to the Council to deliver this form of housing, the Council took the opportunity to progress exploration of CLH. BCLT at this point and remain today the only group within the borough set up to deliver CLH.

- 3.3. In 2019, the Greater London Authority (GLA) launched a £38m fund to enable CLH so that Londoners including Brent residents could play a leading role in delivering genuinely affordable homes in their community. The group successfully secured a further £40k from the GLA’s fund and this was match funded by the Council. The purpose of this money was to increase the BCLT’s capacity to specifically deliver CLH including scoping potential sites and carry out the initial community engagement required to understand the local housing need. Alongside the match funding, the Council committed to reviewing sites that were undesirable under the New Council Homes programme (likely due to size) but could be utilised for the purpose of CLH. BCLT’s membership at the time included an experienced development consultant, who worked with the Council to review all options and identify the best possible opportunity. Out of the sites reviewed, the site at Brentfield Road Appendix 1) was agreed as the most appropriate for BCLT to take forward.
- 3.4. Once the site at Brentfield Road was identified as an indicative opportunity, BCLT hosted a series of workshops with their Board Members and the community to consider the type of housing they wished to build and any other objectives they wanted to achieve through the development. Development viability and technical design were also considered. These workshops were held in May and June 2021.

4. The proposed site and arrangement

- 4.1. The site at Brentfield Road (two parcels edged in red in Appendix 1) includes a small area of parking on the forecourt of 8 disused garages, which have fallen out of use and now require significant major works. The adjacent parcel is behind hoardings and contains a smaller number of garages.
- 4.2. The size and shape of the site lends itself to a block of flats being developed, mostly smaller homes e.g. 1 and 2 bedroom properties. Currently, an indicative scheme of 20 one-bedroom flats comprising a mix of one-bedroom 1 person and 1 bedroom 2 person’s properties has been designed. It is proposed that these flats will be a mixture of 40sqm and 50sqm which will meet the current minimum space standard of 37sqm for one-bedroom one person and 50sqm for a one-bedroom two person. This will be subject to feasibility, daylight, sunlight and other reports that will inform height, bulk and

massing.

- 4.3. Due to the time that has lapsed since the workshops with the community and Board Members were held, a review meeting of the CLH proposal was held in March 2023. In this meeting it was acknowledged the economic environment has changed considerably and so next steps would be for BCLT to review the type of affordable housing the housing they wished to develop, the rent levels and how these homes would be allocated.
- 4.4. As the current rent level is not defined it is not yet confirmed if a viable scheme can be delivered. Viability assessments however will be based on the assumption that the land will be available at nil consideration and borrowing from social and ethical lenders is used to finance the scheme. No further direct Council funding is being sought at present but there is potential for future funding requirements. The GLA's Community Housing Fund can provide revenue funding to take forward detailed designs and submitting a planning application and other legal costs. It is however a requirement that the BCLT can evidence the Council's commitment to supplying the land to the GLA in order to access capital funding and progress the project.
- 4.5. The proposal therefore is that the Council agrees to ring-fence the site on Brentfield Road outlined in Appendix 1 and issue BCLT with a letter of intent outlining this commitment. It is proposed, this commitment is for 12 months, at which point the progress and viability of the scheme will be reviewed by the Council and BCLT and a further recommendation made to the Council on whether to continue holding the site should planning permission for a proposed scheme have not been granted by this point.
- 4.6. During this period, BCLT will be seeking to design and submit a scheme to planning as well as obtain Capital funding from the GLA. If achieved the three criteria; of planning permission, capital funding and a viable scheme will act as the threshold for the Council to then enter into a 250 year lease with BCLT for the Brentfield site. This contract structure can allow the Council to retain a proportionate degree of control through restrictive use covenants and step-in to the project if required.

5. Resident Engagement and Community Led Housing

- 5.1. CLH is defined by the London Housing Strategy and London Local Plan using the following principles:
 - Meaningful community engagement and consent occurs throughout the development process;
 - There is a presumption that the community group or organisation will take a long-term formal role in the ownership, stewardship, or management of the homes; and
 - The benefits of the scheme to the local area and/or specified community group are clearly defined and legally protected in perpetuity.

- 5.2. To ensure that these principles are not only upheld but improved upon, the Council will require BCLT to produce an engagement plan which specifically sets out how BCLT will co-produce the design of the homes with the local community and those living on the estate.
- 5.3. This plan will be monitored by the Affordable Housing and Partnerships service at monthly progress meetings.
- 5.4. The BCLT operate as a Board which is where decisions on progressing the development and the design are made. To ensure this Board is representative, a condition of this arrangement is for the Board to proactively recruit residents from the estate surrounding the site to ensure the local communities' voices are represented. It is also essential the journey to delivery CLH represents the views of all communities, particularly those in the Stonebridge ward. The Affordable Housing and Partnerships service will support the BCLT to make reasonable efforts to ensure any engagement associated with this scheme is accessible and encouraging to all residents.
- 5.5. In supporting this pilot, the Council is demonstrating its ambition for communities to play a leading role in addressing the housing crisis. There are many routes into CLH and whilst BCLT is currently the only group that has approached the Council with this ambition, it creates an opportunity to inspire other community groups within the borough. Any future proposals received by the Council will be considered for the same opportunities and support provided to the BCLT.

6. Financial Implications

- 6.1. The leasing of the land at £1 consideration amounts to a subsidy by the Council. A more detailed review will be required in line with the new Subsidy Control Act 2022 (section 7.5 below refers) to confirm the impact on this scheme. The proposed award of a long lease to BCLT to the value of £1 will be made conditional upon planning approval and appropriate project financing of which the Council will review.

7. Legal Implications

- 7.1. A Local Authority must dispose of Housing Land at market value The General Housing Consent 2013 applies to land held under Part II of the Housing Act 1985 (HA 85) i.e. housing accommodation held within the housing revenue account (HRA). If the Council holds any such land then it can only be disposed under section 32, HA 85 which requires Secretary of State consent. A number of general consents have been issued that can potentially be relied on by the Council. One of the consents commonly used allows the transfer of vacant land at less than market value if certain conditions are met.
- 7.2. If property is to be provided at below market value and to be used for the purposes of privately let housing then restrictions contained in s.24 and s.25 Local Government Act 1988 (88 Act) would need to be considered for both

HRA and general fund land. These provisions provide that whilst an authority has the power to provide a financial assistance or a gratuitous benefit to any person, which includes the transfer of land at an undervalue, it must first have Secretary of State consent to do either. 13 Consent would therefore be needed to transfer land at an undervalue or provide a loan or equity finance if the Vehicle will provide privately let accommodation.

7.3. There are two documents in which the Secretary of State has granted general consents under section 25, Local Government Act 1988: 2010 and 2014 (2014 Consent). Consent AA1 of the 2014 Consent allows an authority to give to any person financial assistance or a gratuitous benefit consisting of the disposal of HRA land for development as housing accommodation (including facilities to benefit the occupiers). This is subject to conditions:

- any housing accommodation already on the land must be vacant;
- there must be freehold transfer, assignment of a lease with an unexpired term of at least
- 99 years or the grant of a lease of at least 99 years;
- the disposal must require the development to take place within three years;
- the accommodation must be let privately as housing accommodation;
- the authority cannot manage or maintain any of the housing accommodation after the disposal.

7.4. The last condition may be a problem where the Council is forced to exercise any step in rights and deliver the scheme itself and in view of this the Council should consider obtaining SOS consent to the scheme rather than relying on the 2014 Consent.

7.5. The Council must also consider Subsidy Control:

The new rules on Subsidy Control are contained in the UK-EU Trade and Cooperation Agreement (TCA), which require public authorities to consider on a case-by-case basis whether financial support could fall within the definition of “*subsidy*” and if so whether it would comply with six key principles. Support may be considered lawful if it satisfies the principles and does not fall within a prohibited category. Unlawful subsidy can be challenged in the courts by judicial review,

7.6. The TCA² defines “subsidy” as financial assistance which meets the following conditions:

- arises from the resources of the Parties [i.e. the UK and EU], including:

7.6.1 a direct or contingent transfer of funds such as direct grants, loans or loan guarantees;

7.6.2 the forgoing of revenue that is otherwise due; or

- 7.6.3 the provision of goods or services, or the purchase of goods or services (Condition 1);
- 7.6.4 confers an economic advantage on one or more economic actors (Condition 2);
- 7.6.5 is specific insofar as it benefits, as a matter of law or fact, certain economic actors over others in relation to the production of certain goods or services (Condition 3); and
- 7.6.6 has, or could have, an effect on trade or investment between the Parties [the UK and EU] (Condition 4)

- the government published a new subsidy control bill on 30 June 2021, which is intended to come into force this year and accordingly further specialist advice will be needed in relation to how the provisions of the new Bill will impact this scheme.

7.7. A Development Agreement/Agreement for Lease will need to be entered into conditional upon planning. Various provisions and warranties will need to be entered into with various contractors direct with the Council to ensure that the Council is able to proceed with the development should the BCLT fail to deliver. The Development Agreement would need to cover standard of construction and a prohibition against assignment.

8. Equality Implications

8.1. The Council will ensure BCLT carry out an Equality Impact Assessment to support engagement activity within the community for the design of the scheme. Additionally, allocations of the housing will be in keeping with relevant legislation and policy including the Council's Allocations scheme to ensure decisions are compliant.

9. Consultation with Ward Members

- 9.1. Ward members have expressed the need for Stonebridge residents, specifically those who live close to the site to have a direct input and benefit from the site being developed.
- 9.2. The BCLT will be required to formally engage and co-produce plans with local residents for this scheme. Additionally the Council's Allocation's Scheme means any residents who have an existing housing need will be prioritised for properties subject to confirmation of their tenure type.

Related Documents:

[Scrutiny report – Affordable Housing in Brent](#)

Report sign off:


Peter Gadsdon

Corporate Director Resident
Services

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	Cabinet 22 May 2023
	Report from the Corporate Director, Resident Services
Award of Contracts for Enforcement and Collection Agent Services	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Part Exempt - Appendix 2 of the report 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 1: Equality Assessment Appendix 2: Names of Tenderers (exempt) Appendix 3: Scores of Tenderers
Background Papers:	None
Contact Officer(s):	<p>Thomas Cattermole Director of Customer Access 020 8937 5446 Email: Thomas.Cattermole@brent.gov.uk</p> <p>Peter Cosgrove Head of Revenue and Debt, 020 897 3453 Email: peter.cosgrove@brent.gov.uk</p> <p>Sandor Fazekas Head of Healthy Streets and Parking 020 8937 5113 Email: Sandor.Fazekas@brent.gov.uk</p>

1.0 Purpose of the Report

- 1.1 This report concerns the award of contracts for the provision of the Debt Resolution Service following approval of the Director of Customer Access on 24 March 2023 to procure the provision of the Debt Resolution Service.

- 1.2 This report sets out the approvals required from Cabinet to award contracts for:
- i. the provision of Debt Resolution Services for the collection of unpaid debts in relation to parking and traffic Penalty Charge Notices, Council Tax, Sundry, Adult Social Care client contribution, housing benefit overpayments and other debts that may require use of an enforcement agent or collection agent (“Debt Resolution Services”).
 - ii. the provision of debt collection services for debts owing to the council where enforcement is not an option, such as former tenant arrears and sundry debts.
- 1.3 This report summarises the procurement approach followed, the decision process and added value commitments of the selected enforcement agents and the ongoing commitment to the Council’s Ethical Debt Recovery Policy.

2.0 Recommendation(s)

That Cabinet:

- 2.1 Approves the award of the concession contracts for the provision of the Debt Resolution Services to the following three Enforcement Agent companies for a period of four (4) years:
- i. Newlyn PLC,
 - ii. Marston (Holdings) Ltd, and
 - iii. CDER Group Ltd.
- 2.2 Approves an exemption pursuant to Contract Standing Order 84(a) of the requirement to tender a contract for Debt Resolution Services with Newham LBC’s oneSource service for the reasons set out in paragraphs 3.10 - 3.12.
- 2.3 Approves the award of a concession contract for the provision of Debt Resolution Services with Newham LBC’s oneSource service for a period of four (4) years.

3.0 Detail

Parking and Road Traffic

- 3.1 The council issues Penalty Charge Notices (PCNs) for a variety of parking and traffic infringements. There are four main categories of PCNs:
- i. Civil Enforcement Officer (CEO) issued PCNs: PCNs fixed to the windscreen of a vehicle or handed to the driver for parking contraventions;
 - ii. CCTV Parking PCNs, PCNs served by post for parking contraventions, where the contravention has been captured by a CCTV camera;

- iii. CCTV Moving Traffic PCNs: PCNs served by post for moving traffic contraventions (e.g., stopping in a yellow box junction, or turning left or right where the manoeuvre is prohibited); and
 - iv. CCTV Bus Lane PCNs: PCNs served by post for Bus Lane infringements,
- 3.2 The relevant statutes prescribe different timescales for increasing Penalty Charges should prompt payment not be received, for serving subsequent notices, and for permitting challenges, representations, and appeals. Ultimately, non-payment of a PCN will result in the council formally registering the PCN as a debt at Northampton County Court Traffic Enforcement Centre (TEC), which covers all PCNs for England, as a precursor to issuing an Enforcement Agent ('bailiff') with a warrant to collect the outstanding debt on the Council's behalf.

Council Tax

- 3.3 Non-payment of Council Tax once a process of reminders is complete may result in the application by the Council to the Magistrates' Court for a Liability Order by the Council. The Liability Order may be enforced in a number of ways. This can include:
- i. ordering an employer to make deductions direct from the debtor's salary or wages;
 - ii. applying to the Department for Work and Pensions to make deductions from benefits;
 - iii. a request to the court to place a charge on a property owned by the debtor;
 - iv. apply to the court for a bankruptcy order;
 - v. issue a warrant of arrest for a committal hearing;
 - vi. passing the debt to Enforcement Agents to enforce. This is the most common option as the Council often lacks other information that is required by the other options and it is this option that is relevant to the procurement of Debt Resolution Services.

Parking and Council Tax Enforcement charges

- 3.4 For warrant and liability orders the same regulations apply. These are The Taking Control of Goods Regulations 2013 ("Regulations") that were introduced nationally in 2014 to standardise Enforcement Agent fees and practices.
- 3.5 The fees added by the Enforcement Agents are set by these Regulations, with the debt element remitted to the Council. These additional fees charged to the debtor are as follows:
- i. Compliance fee: £75
 - ii. Enforcement fee: £235
 - iii. Sale/Disposal fee: £110

- 3.6 In addition to enforcement work, the providers will also work as a debt collection agent on behalf of the Council. The debts in these cases will be where the Council does not have a legal instrument to enforce such as with sundry debt, overpaid HB and former tenant arrears where no county action has been taken.

Evaluation Criteria and Appointment of Three Providers

- 3.7 As set out in Section 4, the procurement of Enforcement Agents has been through a framework set up by Crown Commercial Services. As the enforcement fees are set by regulation, the price element is not particularly relevant when evaluating the prospective Enforcement Agents tenders.
- 3.8 Tenders were therefore scored with a weighting of 90% for quality of service (including social value) and 10% for pricing.
- 3.9 Three Enforcement Agent companies will be appointed under contracts, with the specification drafted to ensure that a higher proportion of warrants, County Court Judgements and liability orders will be passed to the best performing provider.
- 3.10 All agents are required to work in accordance with the Council's Ethical Debt Recovery Policy and appropriate professional standards, ensuring that residents of Brent are supported as required.

Appointment of Newham LBC's oneSource

- 3.11 It is recommended that in addition to the appointment of three Enforcement Agents under the CCS framework, there is also the appointment of Newham LBC's oneSource.
- 3.12 Newham LBC's oneSource is very focused on ethical collection and support for residents. It is felt that having oneSource as an Enforcement Agent will complement the services provided by the other Enforcement Agents in that it:
- is a direct local authority service,
 - has a clear commitment to values, similar to those of Brent,
 - does not operate for profit,
 - will provide a share of its fee income,
 - has a very strong commitment to ethical collection and
 - provides one-to-one support for residents that shall be particularly useful in dealing with debt in Brent.
- 3.13 In order to directly appoint Newham LBC oneSource, it is recommended to approve an exemption pursuant to Contract Standing Order 84(a) of the requirement to tender a contract for Debt Resolution Services.

4.0 Procurement

The Tender Process for the three Providers

- 4.1 The process involved a mini competition via Lot 5 of the Crown Commercial Service (CCS) RM6226 framework agreement. Under Lot 5 there are 13 suppliers appointed.
- 4.2 A mini competition was published on 24th March 2023, using the Council's Electronic Tendering Facility. All 13 suppliers were offered the opportunity to bid for the proposed contract.
- 4.3 Evaluation was carried out based on the contractor's quality, social value and price.
- 4.4 The tendering instruction stated that three highest scoring contractors would be selected for contract award based on the most economically advantageous offer to the Council and that all compliant Tender responses would have regard to the following evaluation award criteria:

Award Criteria	Weighting (%)
Quality 1. Service Delivery 2. Quality of Service 3. Debt Recovery Process 4. Added Value	30% 20% 20% 10%
5. Social Value	10%
6. Pricing Schedule	10%
Total	100%

The Evaluation Process

- 4.5 The tender evaluation was carried out by a panel of officers from Parking Services and Revenue and Debt.
- 4.6 All tenders had to be submitted electronically no later than 18th April 2023, 13:00. Tenders were opened on 18th April 2023 after 13:00 and 5 valid tenders 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 response documents.

- 4.7 The evaluation panel met on 20th April 2023 for a moderation meeting and each submission was marked by the whole panel against the award criteria. The pricing, social value and quality scores were then combined to give a total score for each tenderer.
- 4.8 The names of the tenderers are included in Appendix 2. The scores received by the tenderers are included in Appendix 3. It will be noted that Supplier 1, 2, 3 are the top 3 highest scoring tenderers. Officers therefore recommend the award of the contract to Supplier 1, namely Newlyn Plc; Supplier 2, namely Marston (Holdings) Ltd; and Supplier 3, namely CDER Group Ltd.

5.0 Financial Implications

- 5.1 All income due to the Council is recognised in the Council's General Fund revenue account, Housing Revenue Account or Collection Fund in the year it is due for collection.
- 5.2 The Council also makes a provision for a proportion of debt being uncollectable. The methodology applied is specific to the expected collectable amount for each type of debt. However, for all types of debt, the General Fund, Housing Revenue Account or Collection Fund incur a cost equivalent to the increase in the provision.
- 5.3 Reducing the amount of uncollectable debt through this service may subsequently lead to a reduction in the provision for uncollectable debt. This would result in a release of funds back to Council's General Fund revenue account, Housing Revenue Account or Collection Fund.
- 5.4 The cost to the Council of the use of enforcement agents to the Council is nil. This is because enforcement agents make their revenue by collecting the statutory fees from debtors, and these fees that are paid first by the debtor. Where the agents are given other debts to collect as a collection agent, no fees are charged to the debtor. In these cases the agents will make revenue by keeping a proportion of the debt they collect, the proportion they keep will be agreed with the Council and is dependent on how hard it may be to collect, all debts offered to agents in this way will already be covered by the Council's bad debt provision, so all monies collected are in addition to expectation.

6.0 Legal Implications

- 6.1 Officers are proposing that concession contracts are awarded to three Enforcement Agent companies following the procurement process set out in Section 4 and the direct award of a contract to the London Borough of Newham oneSource for a period of up to four years.
- 6.2 The appointment of the Enforcement Agents will be classed as Concession Contracts and are therefore subject to the Concession Contracts Regulations 2016. The threshold for concession contracts is £5,336,937.00. The combined value of the three proposed contracts with Enforcement Agents procured under the CCS framework is £1,500,000.00, which would fall below this threshold.

Each individual concession contract will be in the region of up to £375k, with the London Borough of Newham's oneSource contract being of a similar value to that of the other enforcement agent companies.

- 6.3 For the purposes of the Council's Standing Orders and the Financial Regulations, the estimated individual value of the Enforcement Agent contracts will be classed as Medium Value Contracts. Contract Standing Orders provide that Medium Value Contract should be procured by way of a tender process or via a competitive process under a framework. The three enforcement agent companies have been procured under the CCS framework. However, Officers consider that direct award of the contract with the London Borough of Newham's oneSource is appropriate and an exemption is sought pursuant to Contract Standing Order 84(a) of the requirement to tender a contract. Given that the value of the proposed contract is considerably less than the threshold for application of the Concession Contracts Regulations 2016, it is legally permissible to grant such waiver.
- 6.4 As the procurement of the Debt Recovery Service is from a framework, there is no requirement for the Council to observe a 10-day standstill period under the PCR 2015, although the award of the contracts will be subject to the council's usual call-in process.

7.0 Equality Implications

- 7.1 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
- 7.2 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.
- 7.3 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.
- 7.4 The requirement to appoint enforcement agent suppliers is considered necessary to recover debts from customers who wilfully neglect their obligation to meet liabilities owed to the Council. This procurement of suppliers for enforcement agent services will assist the Council in meeting its statutory obligations to recover former tenants Housing Rent arrears, Parking, Council Tax, National Non-Domestic Rates, Adult Social Care client contributions,

Housing Benefit Overpayments and Sundry debts that are owed to the Council. The enforcement agents being mindful of how debt collection is recovered where people are vulnerable, through age, disability etc. The successful suppliers will take on the public sector equality duty on the Council's behalf.

- 7.5 The Council is under statutory obligation to recover current and historic debt. An equality assessment has been undertaken and the assessment is attached as Appendix 1. It is necessary to have regard to the assessment when considering the Recommendations.

8.0 Consultation with Ward Members and Stakeholders

- 8.1 The Council has consulted Councillor Fleur Donnelly-Jackson, Cabinet Member for Customers, Communities & Culture.

9.0 Human Resources/Property Implications (if appropriate)

- 9.1 None

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 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 a services contract. Nevertheless, Officers have had regard to considerations contained in the Social Value Act in relation to the procurement.
- 9.2 As detailed at paragraph 4.4, Social Value was assigned a weighting of 10% of the evaluation score.

Report sign off:

Peter Gadsdon

Corporate Director, Resident Services

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Enforcement and Collection Agent Procurement
DEPARTMENT:	Resident Services
TEAM:	Revenue and Debt Recovery
LEAD OFFICER:	Ryan Stephenson
DATE:	17 April 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.

The procurement of suppliers for enforcement agent and debt collection agency services will assist the Council in meeting its statutory obligations to recover former tenants Housing Rent arrears, Parking, Council Tax, National Non-Domestic Rates, Adult Social Care client contributions, Housing Benefit Overpayments and Sundry debts that are owed to the Council. The Council is under statutory obligation to recover current and historic debt.

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

Affected parties include residents, organisations or any individual who are in arrears with the Council which remain unpaid following request for payment by issue of demand notices or dialogue with recovery teams.

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

There is relevance to equality and public sector equality duty as the nature of enforcement and debt collection services are directed to targeted groups of customers who have debts with the Council, potentially across multiple services. Additional disadvantages may also be experienced due to socio-economic inequalities such as poverty, social or technological isolation and economic deprivation. We have consulted with lead members and intend to publish on the Council's forward plan for Cabinet approval in May 2023.

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

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

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

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

SECTION B – IMPACTS ANALYSIS

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

There is an acknowledgment that not all amounts will be owed by the residents of Brent as there is the potential for a wider impact nationally. However, by using the CCS Framework the Council's objective is to appoint reputable, professional enforcement agents with a proven history of good customer service, customer engagement and relationships with voluntary sector organisations who have specialised teams to deal with customers. There is also a requirement for service providers to comply with the Council's Ethical Debt Recovery Policy.

No external engagement has been undertaken; however internal stakeholders have been engaged with to ensure this procurement exercise creates a joined-up approach to recovery of debts across Council services. Engagement with internal stakeholders will continue on a monthly basis with updates to the relevant Cabinet lead member.

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	<p>Consideration to exclude individuals or groups from referral to enforcement agents can be derived from records held on financial assessments and revenues systems.</p> <p>The age of customers can be identified through from for example, groups in receipt of pension payments, customers residing in care homes or care leavers. As part of existing contractual arrangements, the Council would not encourage enforcement agent visits to residences where vulnerability may be a factor.</p>
DISABILITY	
Details of impacts identified	<p>The Council will seek to identify any customers who may be disabled from exemption and discount records. Currently, where an exemption is applied from liability due to severe mental impairment, the Council are able to exclude identified groups from enforcement agent referral. Arrangements are in place to provide services relating to sight, hearing and language.</p>
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

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?

No

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?

N/A

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

Regular meetings with suppliers and internal legal department stakeholders. Commitment to attend community events for engagement with potential or newly identified affected groups.

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 Council will ensure appointed suppliers abide by the public sector equality duty.

The specification requires suppliers to outline their training programmes for staff inclusive of procedures and processes for review of performance and continuous learning.

In reference to any complaints received the appointed supplier is required to address instances of poor standards/behaviours, reporting in regular meetings actions taken to mitigate and avoid recurrence.

Suppliers will be required to carry out duties on behalf of the Council in accordance with the Council's Ethical debt recovery policy

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

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	<i>Ryan Stephenson - 17 April 2023</i>
REVIEWING OFFICER:	Angela Chaudhry
HEAD OF SERVICE:	Peter Cosgrove 20 April 2023

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

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Appendix 3

Scores of Tenderers

AUTHORITY TO AWARD CONTRACT FOR Enforcement Service a Framework Agreement


Quality	Weighting	Supplier 1 Score	Supplier 1 Result	Supplier 2 Score	Supplier 2 Result	Supplier 3 Score	Supplier 3 Result	Supplier 4 Score	Supplier 4 Result	Supplier 5 Score	Supplier 5 Result
1. Service Delivery	30%	4	24.0%	4	24.0%	3	18.0%	4	24.0%	3	18.0%
2. Quality of Service	20%	5	20.0%	4	16.0%	4	16.0%	3	12.0%	3	12.0%
3. Debt Recovery Process	20%	4	16.0%	4	16.0%	4	16.0%	3	12.0%	4	16.0%
4. Added Value	10%	5	10.0%	4	8.0%	4	8.0%	4	8.0%	3	6.0%
Total Quality	80%	18	70.0%	16	64.0%	15	58.0%	14	56.0%	13	52.0%

Social Value	Weighting	Supplier 1 Score	Supplier 1 Result	Supplier 2 score	Supplier 2 Result	Supplier 3 score	Supplier 3 Result	Supplier 4 score	Supplier 4 Result	Supplier 5 5score	Supplier 5 Result
1.6 Stronger Foundation	5%	3	3.0%	3	3.0%	4	4.0%	3	3.0%	3	3.0%
2.3 Every Opportunity to Succeed.	3%	5	3.0%	3	1.8%	4	2.4%	3	1.8%	3	1.0%
4.1 A Cleaner Considerate Brent	2%	4	1.6%	2	0.8%	3	1.2%	2	0.8%	2	0.8%
Total Quality	10%	12	7.6%	8	5.6%	11	7.6%	8	5.6%	8	5.6%

Price		
Name of Tenderers:	Total Price	Overall Weighted Score (Price)
Supplier	£00.00	10%
Supplier	£00.00	10%
Supplier	£00.00	10%
Supplier	£00.00	10%
Supplier	£00.00	10%

Total Scores				
Name of Tenderers:	Overall Weighted Score (Price)	Overall Weighted Score (Quality)	Total Quality and Price	Rank
Supplier 1	10%	77.6%	87.6%	1st
Supplier 2	10%	69.6%	79.6%	2nd
Supplier 3	10%	65.6%	75.6%	3 rd
Supplier 4	10%	61.6%	71.6%	4 th
Supplier 4	10%	57.6%	67.6%	5 th

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 Brent	Cabinet 22 May 2023
	Report from the Corporate Director of Finance and Resources
Authority to Tender Contract to Design, Build, Operate and Maintain the South Kilburn District Heat Network	

Wards Affected:	Kilburn
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:	None
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Catherine Arotsky, Senior Energy & Sustainability Manager 020 8937 2942 catherine.arotsky@brent.gov.uk Oliver Myers, Head of Environmental Strategy, Commissioning and Climate Change 020 8937 5323 Oliver.myers@brent.gov.uk

1.0 Purpose of the Report

- 1.1 This report concerns the district heat network in South Kilburn which will provide low carbon heat to the South Kilburn regeneration programme. This report requests approval to invite tenders in respect of a contract for a Design, Build, Operate and Maintain contractor, through a competitive dialogue procedure, as required by Contract Standing Orders 88 and 89.
- 1.2 This report highlights the offer of £4.7m of grant from the Green Heat Network Fund (GHNF) towards the costs of constructing the district heat network and

£0.45m towards the council's costs to procure the network including internal and external costs.

2.0 Recommendation(s)

That Cabinet:

- 2.1 Approves inviting tenders to Design, Build, Operate and Maintain the South Kilburn Heat Network on the basis of the pre - tender considerations set out in paragraph 3.11 of the report.
- 2.2 Approves Officers evaluating the tenders referred to in 2.1 above on the basis of the evaluation criteria set out in paragraph 3.11 of the report.
- 2.3 Notes the award of a grant of £4.7m from the Green Heat Network Fund is to be applied towards the costs of constructing the district heat network and £0.45m towards the council's costs to procure the network.
- 2.4 Notes that the project utilises S106 funds specifically allocated as set out in paragraph 5.4.
- 2.5 Approves the allocation of an estimated £5.3m from prudential borrowing, to fund the remainder of the scheme.

3.0 Detail

- 3.1 The South Kilburn District Heat Network will be a network of pipes feeding heat to the buildings in South Kilburn.
- 3.2 The use of a district heat network is in-line with GLA policy and Brent's Local Plan. For South Kilburn, the heat network aims to initially provide low carbon heat but ultimately to provide zero carbon heat to developments in South Kilburn which form part of the South Kilburn Regeneration Programme along with additional connections where appropriate and practicable.
- 3.3 The Critical Success Factors for this project are:
 - Ensures affordable low carbon heat to all residents in South Kilburn buildings which are connected to the network;
 - Provides low carbon heat to developments in South Kilburn in order to help enable them to comply with the energy requirements of the London Plan;
 - Provides a service which residents believe is satisfactory and value for money;
 - Provides CO₂ savings contributing to the Council's aspiration to be net zero carbon by 2030;
 - Delivers an employment and training programme to enable local residents to work on the installation and management of the project.

- 3.4 Having sought and reviewed external consultancy advice on a range of delivery options, Officers' preferred way to deliver the area wide network of pipes supplying the buildings within the South Kilburn Regeneration Programme (the "Estate") with heat and hot water is that Brent Council will directly contract and client a single contractor who will design, build, operate and maintain the generating system and its distribution pipes to connected buildings on the Estate.
- 3.5 By the Council managing the system, it will be able to control the system including setting the heat tariff for the network. Brent will bill the residents in Brent Housing managed buildings based on consumption and supply heat in bulk to the buildings that are managed by others such as the Housing Associations, building management organisations, schools, affordable workspaces, retail and medical facilities. Users, including residents, will have full control over their systems in terms of time and temperature control.
- 3.6 One of the Critical Success Factors is to provide affordable heat to residents in South Kilburn. This will be achieved as Brent will manage the heat tariff. One of the key components of the heat tariff is the cost of fuel. As Brent will manage the system, Brent will procure the fuel for the network through its favourably priced public sector buying process. This process has resulted in competitive prices throughout the current volatile energy markets.
- 3.7 The preferred technology solution is to use air source heat pumps either with gas boilers to provide back-up or electric boilers. These are coupled with thermal stores to manage peak heat demands. The final technological solution will emerge through the proposed competitive dialogue process for procuring a Design, Build, Operate and Maintain Contractor.
- 3.8 Officers have reviewed the procurement and delivery options for a heat network in the context of the project's critical success factors and the project risks. Officers have also considered commercial implications to ensure that the network will offer best value to the council and the network customers. The proposal to procure a Design, Build, Operate and Maintain Contractor ensures that the contractor is responsible for the quality of the construction and that the contractor will ensure that the network will operate efficiently. This type of contract also offers the opportunity for the local community to engage with the contractor to ensure that their priorities can be met.
- 3.9 Officers have undertaken soft market engagement to understand the market position with regard to procuring a heat network. This engagement considered the market position with regard to the proposed procurement through Competitive Dialogue, the appetite of the market for this project, contract length, mitigation for the volatility of the construction market and other project specific considerations.
- 3.10 The responses to the soft market engagement were generally positive and contractors were keen to engage in the project. Ten contractors participated in

focused sessions supporting the Council to ensure procurement offers the most favourable opportunities for the market whilst ensuring best value and good quality for the Council. In summary:

- All contractors were engaged and interested in the potential for the South Kilburn Heat Network.
- Overall, the response to the quality/price split was quite balanced, but with a slight favouring towards a higher score for quality.
- Overall, the respondents welcomed the use of Competitive Dialogue but noted the requirement to be clear on what was open for Dialogue.
- Overall, the respondents agreed that a term of 15 years was appropriate as long as this included provision for extending the contract.
- Respondents highlighted the risks of the heat demand and distribution in the buildings not being optimised with the design of the heat network and discussed solutions to mitigate for that risk.
- Several other risks were highlighted based on contractor experience. In particular, the requirements of Highways need to be clear as part of the procurement documents to avoid later delays and price increases and provision of information by the council on ground risk.
- Respondents highlighted some likely changes to the law which could impact any heat network however, the decarbonisation of the network is a key mitigation. A number of respondents highlighted that the use of gas boilers is a risk due to changes in legislation and they proposed alternatives.
- Planning risk was also highlighted which can be mitigated by applying for planning permission prior to signing contracts.

3.11 In accordance with Contract Standing Orders 88 and 89, pre-tender considerations have been set out below for the approval of the Cabinet.

Ref.	Requirement	Response	
(i)	The nature of the works and services.	Design, build, operate and maintain the South Kilburn District Heat Network.	
(ii)	The estimated value.	Works £17.5m (15 years initial term) £19m (25 years extended term) Services £9m (15 years initial term) £17m (25 years extended term)	
(iii)	The contract term.	Initial period of 15 years with a potential to extend for up to an additional 10 years.	
(iv)	The tender procedure to be adopted.	The Competitive Dialogue Procedure (CD). The grounds for use of CD are set out the Legal Implications section of this report.	
v)	The procurement timetable.	Indicative dates are:	
		Adverts placed	12/06/2023

Ref.	Requirement	Response	
		Selection Questionnaire returned	21/07/2023
		Shortlist drawn up in accordance with the Council's approved criteria	04/08/2023
		Invite to Participate in Dialogue	18/08/2023
		Invitation to Submit Final Tenders	10/03/2024
		Deadline for tender submissions	30/03/2024
		Panel evaluation	April 2024
		Contract decision	May 2024
		Report recommending Contract award circulated internally for comment	May 2024
		Cabinet approval	June 2024
		A minimum 10 calendar day standstill period – notification issued to all tenderers and additional debriefing of unsuccessful tenderers	10 day call in
		Contract Mobilisation	July 2024
		Contract start date	August 2024
(vi)	The evaluation criteria and process.	<p>1. At selection stage shortlists are to be drawn up in accordance with the Council's Contract Procurement and Management Guidelines by the use of a selection questionnaire to identify organisations meeting the Council's financial standing requirements, technical capacity and technical expertise. The selection stage will include scoring to ensure the quality of the bidders to be taken forward for dialogue.</p>	

Ref.	Requirement	Response
		<p>2. At tender evaluation stage, the panel will evaluate the tenders against the following criteria:</p> <ul style="list-style-type: none"> • <i>Quality</i> - 50% • <i>Price</i> - 35% • <i>Social Value</i> - 10% • <i>Commercial/Risk*</i> - 5% <p>These criteria support the goal of enhanced quality of service provision, given the long term nature of the contract and the services to residents, at a competitive price.</p> <p>*The full Tier 1 criteria for Commercial and Risk is: acceptability of the contractual and risk position based on bidder commentary on and/or mark-up of the Contract, including both the Conditions of Contract and the Schedules.</p>
(vii)	Any business risks associated with entering the contract.	The business risks considered to be associated with entering into the proposed contract are included in paragraph 3.13 below. Financial Services and Legal Services have been consulted concerning this contract and have identified the risks associated with entering into this contract set out in sections 5.0 and 6.0 of the report.
(viii)	The Council's Best Value duties.	The council will undertake a competitive tender process to ensure best value.
(ix)	Consideration of Public Services (Social Value) Act 2012	10% of the evaluation is included for Social Value
(x)	Any staffing implications, including TUPE and pensions.	See section 9.0 below.
(xi)	The relevant financial, legal and other considerations.	See sections 4.0, 6.0 and 9.0 below.
(xii)	Sustainability	This project supports the Council's Climate & Ecological Emergency Strategy (2021-2030) in reducing carbon emissions for a large number of dwellings in South Kilburn. Procurement will take

Ref.	Requirement	Response
		into account specific objectives in-line with the Council's Sustainable Procurement policies reducing carbon both in operation and in construction and minimising the generation of other harmful gases and impacts.
(xiii)	Key Performance Indicators / Outcomes	Appropriate Key Performance Indicators / Outcomes will be included in the contract.
(xiv)	London Living Wage	The Contract will require the payment of the London Living Wage.
(xv)	Contract Management	A contract manager will be appointed and appropriate contract management provisions will be included in the contract.

3.12 Cabinet is asked to support these proposals as set out in the recommendations and in accordance with Standing Order 89.

3.13 The key risks associated with this district heating network procurement are described in the table below.

Risk	Likelihood	Severity	Rationale and Mitigation
Little competition during procurement because no bidders or too few respond - cost higher and potentially project delays	Medium	High	<ul style="list-style-type: none"> Proposing a structure based on detailed analysis of the project financial performance and low carbon technical concept design. Presenting the project to the market with clear risk allocation and clear decision-making within Brent. There are a number of contractors whose business model is to deliver this project delivery approach and strategy. The proposed one stage Competitive Dialogue procedure is favoured by the market.

Risk	Likelihood	Severity	Rationale and Mitigation
Significant increase in gas/electricity prices resulting in negative impact on Opex	High	High	<ul style="list-style-type: none"> Considering different purchasing strategies for gas, fixed price has cushioned the network over the winter 2021/22 price hikes. Liaising closely with energy broker. Cost passed on appropriately to customers.
Failure to agree metering, billing, tariff setting across development	Medium	Medium	<ul style="list-style-type: none"> Implement and continue to develop and refine MBT policy throughout project development.
Brent owned district heating network fails to make a surplus and accumulates debt due to a misalignment between assumptions and critical success factors behind the recommendation and business as usual.	Low	High	<ul style="list-style-type: none"> A robust forecasting system and decision-making escalation process will be put in place to foresight difficulties and to timely address them. A tariff review will be done every six months instead of annually.
Certainty of costs: cost impact of technical risks; un/under-estimated capital costs; changes in capital cost due to events including inflation; market response to procurement puts project viability at risk	High	High	<ul style="list-style-type: none"> Quality commercial and technical advice; Customer sales pricing reflect change in costs - no promises until certainty Cost management within contracts can reduce risk Soft market testing

4.0 Alternative Options Considered

- 4.1 Alternative heating strategies have been considered. The alternative to the use of a heat network is that each building within South Kilburn will have its own communal system in-line with the GLA policy and the low heat demands of new buildings.
- 4.2 These systems would have been procured and managed by private organisations which would likely result in higher costs to Brent's residents. In addition, each building would require roof mounted systems, which increases construction costs, to facilitate the extra weight on the roof, increased internal plant space which would result in a reduction in the dwelling provision and the over provision of equipment.
- 4.3 Heat networks offer significant economies of scale by centralising heating plant and reducing the overall equipment required in an area. The proposed strategy also ensures that buildings connected to the network are supplied with low carbon heat with a strategy to achieve zero carbon in-line with the Council's Climate & Ecological Emergency Strategy (2021-2030).

5.0 Financial Implications

- 5.1 The estimated value of the Capital Expenditure works is £17.5m in relation to the 15-year lifespan of the network initially planned. This increases to £19m if the lifespan of the network is extended to 25 years. The cost of operating and providing the heat network services is estimated at £9m under a 15-year lifespan, or £17m if the lifespan is extended to 25 years.
- 5.2 It is anticipated that the cost of this contract for the initial term will be funded from the following sources:

Source	Amount
S106 – specific amounts collected against new developments in South Kilburn	£7.5m
Green Heat Network Fund Grant	£4.7m
Prudential Borrowing	£5.3m

- 5.3 The Green Heat Network fund is providing a further £0.45m of funding towards the procurement costs. This is in addition to the £4.7m grant funding towards the development of the heat network.
- 5.4 The South Kilburn District Heat Network project utilises S106 funds specifically allocated. The amount collected to date is ~£4m. All new developments in the Estate are required to contribute towards the network. The current contribution is £4,000 per dwelling. This is based on the offset cost by not needing to install air source heat pumps in each building. The total expected in relation to this procurement is £7.5m over the next 5-10 years dependent on the South Kilburn construction programme.

- 5.5 Costs of the project will be met from income generated through charging for heat in accordance with the Heat Metering and Billing Regulations and the Heat Trust Guidelines or subsequent regulatory requirements.

6.0 Legal Implications

- 6.1 As detailed in paragraphs 3.4 and 3.5, Officers recommend a Council owned, managed and delivered district heat network having sought external legal and consultant advice and having considered a range of alternative options.
- 6.2 In establishing a district heat network, the Council can rely on powers under section 111 (1) of the Local Government Act 1972 given that the supply of energy to Council tenants, RTB leaseholders, schools and the medical centre are reasonably incidental to the Council's housing function and duties, its LEA duties and its public health and shared social and health care duties.
- 6.3 Where the Council is relying on its subsidiary powers under section 111 (1) of the Local Government Act 1972 to authorise the provision of a service to facilitate the discharge of a specific function, the Council is permitted to charge for services and supplies provided by the district heat network under section 93(1) of the Local Government Act 2003 ("2003 Act") for that function related service by virtue of section 93(7)(a) of the 2003 Act. Section 93 of the 2003 Act only permits a local authority to recover the cost of supply but does not permit the generation of additional income. The local authority does however have some discretion in assessing what is covered by cost recovery and this may include the costs for provision of replacement equipment.
- 6.4 Whilst the Council will own the assets, it would intend procuring and managing a single contractor that will design, build, operate and maintain the district heat network and therefore seeks authority to procure such contractor as set out in Recommendations 2.1 and 2.2. The estimated value of such contract is such that it will be above the Public Procurement Regulations 2015 (the "PCR 2015") threshold. Section (iv) of the table at paragraph 3.11 indicates an intention to use a Competitive Dialogue Procedure to procure the contractor. Such procedure is permitted in accordance with Regulation 26 (4)(a)(iii) of the PCR 2015 on the basis that "the contract cannot be awarded without prior negotiation because of specific circumstances related to the nature, the complexity or the legal and financial make-up or because of risks attaching to them". The services in scope of the contract are sufficiently technically, commercially (in terms of cost and risk allocation) and legally complex to justify its use.
- 6.5 The procurement would be subject to the Council's own Standing Orders and Financial Regulations in respect of High Value Contracts given the estimated value of the procurement. For High Value Contracts, Cabinet approval must be sought to agree the pre-tender considerations and inviting of tenders.

- 6.6 As set out in Recommendation 2.3, Officers have been awarded funding from the Green Heat Network Fund. The Corporate Director or Director has delegated authority pursuant to paragraph 9.5 and 9.7 of Part 3 of the Constitution and Financial Regulation 8.2.2 of Part 2 of the Constitution to enter into such grant funding arrangements. Once the Council has entered into the grant agreement, it must act in accordance with its grant conditions.

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 This project has potential equality impact implications in terms of ability of residents to pay for heat and to ensure that dwellings are affordable to heat.
- 7.6 The Council’s Metering and Billing policy reviewed these equality implications and noted that the proposal to use credit billing managed by the Council ensured that any equality implications are mitigated within that process.
- 7.7 The procurement of the district heat network itself has no adverse equality implications.

8.0 Consultation with Ward Members and Stakeholders

- 8.1 Engagement with the management of existing blocks and developers delivering blocks in the masterplan is ongoing.
- 8.2 Consultation with Kilburn Ward Councillors is also ongoing.

9.0 Human Resources/Property Implications (if appropriate)

- 9.1 The proposal is to manage the network in house. This will require additional staff including a contract manager and officer to support residents. This will be funded through the heat income from the project. Any additional resource would result in additional costs which could increase the heat tariff.
- 9.2 For blocks managed by Brent, there is an aspiration that the Design, Build, Operate and Maintain contractor would take over the maintenance responsibility of automated meter readings, the heat interface units (HIUs) within dwellings and the heating distribution within the blocks from Brent Housing Property Maintenance. Brent Property will also have legal agreement for the Energy Centre (either license or lease) and the DBOM will maintain and operate the centralised heating generating plant/s.


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 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 a services contract. Nevertheless, Officers have had regard to considerations contained in the Social Value Act in relation to the procurement.
- 10.2 Officers recommend that social value comprises 10% of the evaluation score as detailed in section (vi) of the table at paragraph 3.11.

Report sign off:

Minesh Patel

Corporate Director, Finance and
Resources

	Cabinet 22 May 2023
	Report from the Corporate Director of Children and Young People & Corporate Director, Finance and Resources
Brent Residential Children's Care Home Outline Project Business Case	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
No. of Appendices:	None
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Shazia Akram, Head of Forward Planning, Performance and Partnerships shazia.akram@brent.gov.uk Neil Martin, Head of Capital Programmes (Schools) 020 8937 4203 neil.martin@brent.gov.uk

1.0 Purpose of the Report

- 1.1 This report sets out the intention to provide a Residential Children's Care Home in Brent following the successful application for capital funding from the Department for Education (DfE) Children's Home Capital Programme. The report requests Cabinet approval of the outline project business case to allow for officers to identify a suitable property and any required building works and the proposed operating model of the care home.

2.0 Recommendation(s)

That Cabinet:

- 2.1 Approves the Brent Residential Children's Care Home outline project business case.
- 2.2 Approves the delegation of authority to approve the final capital project budget,

project objectives and proposed savings and the operation of the care home to the Corporate Director, Children and Young People in consultation with the Corporate Director, Finance and Resources and the Lead Member for Children, Young People and Schools.

3.0 Detail

- 3.1 In June 2022, the DfE opened applications for its Children's Home Capital Programme Wave 2. This provided an opportunity for local authorities to apply for matched capital funding to create additional provision in residential children's homes for children and young people in their own local area, with capital made available between Autumn 2022 and March 2025.
- 3.2 The Council's bid to the DfE's Children's Home Capital Programme was submitted on 9 September 2022. On 17 November 2022, the Council received a letter which confirmed the bid was successful. This notified Brent that it would be awarded a budget of £1.1m for the development of a residential children's care home in Brent subject to 50% match funding from the local authority.
- 3.3 The Council faces a number of challenges in securing local residential placements for children and young people. At the time of submitting the funding bid the average distance from the young person's home address to their residential home was 24.4 miles. The average weekly cost of a residential placement was £4,700 per week in August 2022, which was above the national average of £4,500 and the highest residential placement at the time was £10,597.
- 3.4 The current highest weekly residential placement cost is £17,122 per week for a young person placed 130 miles away from Brent. The next two highest cost placements both with the same provider are 300 miles away and cost £13,906 and £13,726 respectively. There are six fewer young people placed in a residential home currently than in August 2022, but the average weekly cost is £3,039 higher at £7,739 per week (06 March 2023). This demonstrates the need for a residential children's home in Brent. It is to be noted that in light of rising inflation, providers are very likely to seek inflationary uplifts in the coming financial year. This will increase pressure on the placements budget.

Project Proposal

- 3.5 The project will deliver a four-bed residential step-down home within Brent for looked after adolescents with social, emotional and behavioural needs. The home will provide three bedrooms for a step-down provision to prepare young people who are in residential settings away from the borough for a move into a local fostering placement, supported accommodation (if 16+) or to return home. The remaining one bedroom will be allocated for emergency placements to enable a short-term response for children in crisis.
- 3.6 The home will focus on young people who need support to successfully re-integrate into their home community, providing access to local services and helping the transition towards independence whilst being closer to their family

and friend networks. It will follow Brent's practice framework, enabling greater connection with social work services within the Children and Young People department. The home will enable improvements in employment, education, and training outcomes for young people, reduce the number of young people living outside of the borough and the distance at which they were placed, and reduce the average cost of placements.

- 3.7 The Council will seek to purchase an existing 5/6 bedroom residential property within the borough which will be re-modelled. Four of these bedrooms will be for young people and the extra one or two bedrooms will provide a staff bedroom and staff facilities/office. At the time of drafting this report there are no suitable Council owned properties surplus to requirements.
- 3.8 The proposed residential home would generate an estimated annual cost avoidance saving of at least £169k and up to £461k a year against the children's placement budget. This amount would be directed towards the cost of managing the proposed residential home. Brent would be able to shape the use of the provision according to demand and need to support children and young people's complex needs. The proposed residential home would be focused on enabling young people to exit residential care in a quicker timescale than currently, through transition to lower cost fostering or supported accommodation. Currently it is 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.

Project Objectives

- 3.9 The capital project is estimated to cost up to £2.2m. The DfE required 50%/50% match funding from the LA as part of the bid submission. Therefore, the Council's contribution will be up to £1.1m for the purchase and remodelling of a residential home to create a four-bed residential home in Brent.
- 3.10 The revenue project is estimated to cost £0.9m for staff resources and a further £0.2m for running costs. The running costs include the repayment cost of borrowing £1.1m over 40 years. This will be funded from the existing placements budget for residential care.
- 3.11 By delivering this project the Council will achieve savings by using the residential children's care home as a step-down provision to enable young people to move into fostering or supported accommodation (if aged over 16) sooner than would otherwise be the case, and at a lower weekly cost than the current average cost of a residential placement.

Project Benefits

Social benefits

- 3.12 The main social benefit is that young people will continue to receive care and support in their local community. This will promote their sense of well-being and provide continuity at a critical time in their lives and means that they will not

lose their social, peer and familial connections. Their access to education, employment and training opportunities will not be disrupted and therefore the likelihood of young people becoming NEET (not in education, employment, or training) will reduce. Additionally, young people will be able to participate in local events and youth projects with their peers. This will also benefit social workers and reduce their workload because they will not be traveling long distances. They are more likely to support a greater proportion of young people as their work will keep them in the local area.

Financial benefits

- 3.13 Based on the scenario of a four-bedroom children's home, savings are estimated to be £0.169m against the highest cost emergency placements (currently £10,597 for 1 x emergency placement) and £0.292m for the other residential placements (currently £7,739 based on average costs for 3 x residential placements), totalling £0.461m. It is assumed that the saving against emergency placements is the most achievable in the first year of operation. Assumptions for cost avoidance are set out in Table 1.

Table 1 Cost avoidance based on 4 bedrooms			
Indicative average weekly residential cost for individuals requiring an emergency bed	Indicative weekly cost of proposed Brent's children's home placement	Weekly saving	Cost Avoidance - Saving costs against 2 x 16-week placements
£10,597	£5,309	£5,288	£169,216 (expected year 1 saving only)
Indicative average weekly residential cost for individuals requiring a residential bed	Indicative weekly cost of proposed Brent's children's home placement	Weekly saving	Cost Avoidance based on 3 beds over 1 year at 77% occupancy
£7,739	£5,309	£2,430	£291,892
Estimated Yearly Cost Avoidance			£461,108

Project Assumptions

- 3.14 Table 1 above shows indicative cost avoidance/savings calculations that are based on the following updated assumptions as of 6 March 2023:
- 19 children and young people are currently placed in a residential home and the average cost of these placements is £7,739 per week
 - The expected weekly cost for a Brent run residential home with 4 bedrooms is £5,309 per week per placement
 - The residential children's home would support individuals for an average of 16 weeks. This would enable up to nine young people to be supported each year, with the fourth bed kept as an emergency placement bed. Savings

estimates are, however, based on seven young people (77% occupancy rate to reflect likely matching issues). The indicative cost avoidance for the emergency bed equates to £169,216 per annum and £14,101 per month and it is expected that this can be achieved in the first year

- The indicative cost avoidance of placing a child in the proposed Brent residential home costing an estimated £5,309 versus a private provider at £7,739 is estimated as £2,430 a week. However, to build in an occupancy rate that assumes the home may not be running at 100% capacity, it is estimated that the cost avoidance could be £1,871.10 per week (i.e. £2,430 multiplied by 77%), £8,108.10 per month per child and £97,297.20 per annum per child. For 3 placements, this represents a total cost avoidance of £291,892 annually.

- 3.15 The Council will base the design of the property on the current Ofsted inspectorate guidance. The Council's Capital Team has and will take guidance from colleagues in the Children and Young People's Department as to what does and does not work for residential home design. The property is proposed to include the following areas subject to final decision making:

- Children's bedrooms x three (Stepdown)
- Children's bedroom x one (Crisis/emergency)
- Staff bedroom
- Bathroom facilities
- WC's
- Staff office/welfare area
- Therapy/intervention space
- Communal kitchen and communal living area
- Landscaping

- 3.16 The preferred operating model for a Residential Children's Home in Brent is yet to be determined. The options are for Brent Council to run the home directly or for Brent to commission an external provider to provide services on its behalf. Proposals for the operating model will be developed and taken through necessary governance channels for approval in a timely way in 2023 to enable time for a provider to be commissioned (if this is the preferred operating model) or for staff to be recruited and trained (if in-house is the preferred operating model).

Project Management

- 3.17 In managing the project, the Council will provide the following services either internally or procured externally:

- Project management including:
 - Budget and cost management
 - Programme management
 - Stakeholder engagement including with Members
 - Risk and issue management
 - Procurement activities

- Contract administration
 - Governance over the project to enable oversight and direction
 - Legal advice
 - Procurement advice
 - Technical expertise from a full design team
- 3.18 The Council will be responsible for obtaining all necessary approvals to undertake the capital project including planning approval and building control approval.

Options Appraisal

Option 1: To purchase a 5/6-bedroom property of circa 200m² within Brent

- 3.19 The standard residential care home model is a family home that offers four or five placements. Option 1 would involve purchasing a residential property to convert to a home for up to four young people, alongside accommodation for care workers. This would also make the residential home feel more homely to young people as it would look and feel more like a residential property. The capital cost would be lower than identifying a site and building a bespoke home. **This is the recommended option.**

Option 2: Refurbish an existing council building

- 3.20 This has already been explored with colleagues in Property and there are no current residential properties surplus to requirements. One vacant commercial property called Grove Park Pavilion is being investigated. This option is likely to involve a lower capital cost overall than purchasing a property but has the potential to incur greater costs to convert the property into a residential care home for children. Converting an existing Council building may not provide the homely feeling we want to provide our young people with.

Option 3: Join other London authorities as part of a consortium

- 3.21 Officers explored opportunities for jointly bidding with another LA prior to any bid being submitted. This option was not viable within the timeframe required to submit a bid to the DfE.

Option 4: Do nothing or reject the funding

- 3.22 The DfE has indicated there will not be any future capital funding, so the Council would not have another chance to subsidise the costs of delivering the children's residential home. Also doing nothing will not provide the opportunity to place young people in a Brent provision and will not help to lower the average weekly cost of a residential placement.
- 3.23 Option 1 to purchase and refurbish a property is the **recommended option**. Option 2 (refurbish an existing council building) will continue to be considered until it is deemed unviable, either because it is not available, it cannot provide

the required number of bedrooms following conversion or costs outweigh the conversion of a purchased residential property. Ward councillors will be informed and provided an update as soon as a suitable property is confirmed.

Alignment with Strategic Objectives

- 3.24 The project aligns with 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. The Council has statutory responsibilities in relation to support children and young people.
- 3.25 The development of a residential home in Brent will help towards the Children and Young People departmental priorities:
- Narrow the gap for vulnerable children and young people in Brent
 - Develop and deliver local responses to national policy direction and be agile to effectively look ahead to plan for future changes
- 3.26 The project also aligns with the Brent Borough Plan 2023-2027 outcomes:
1. Prosperity, Pride and Belonging in Brent
 - Easing the cost-of-living Crisis
 2. A Cleaner, Greener Future
 - A cleaner, safer borough
 3. The Best Start in Life:
 - Raised Aspirations, Achievement and Attainment
 - Young People are Seen and Heard
- 3.27 Enabling more children and young people to stay in the borough means they will have greater opportunities to participate in and contribute to the Brent community. They will receive local services to ensure wrap around support is provided to enable them to be fully equipped to succeed in adulthood as they become care leavers

Indicative Capital Programme

- 3.28 Table 2 below sets out the timescale to obtain necessary capital approvals, purchase and develop a property, and an expected opening date. For the funding application, Brent would need to demonstrate both the capital project milestones through the RIBA stages as well as the operational set-up of the home. These are detailed in table 2 below.

Table 2	
Milestone	Date
Internal Project Approval	October 2022 – May 2023
Procure Consultants	May 2023 – July 2023
Purchase Property	May 2023 – August 2023
Design refurbishment (RIBA 1 – 4)	July 2023 – December 2023
Contractor Procurement	January 2024 – March 2024
Construction Works (RIBA 5)	April 2024 – December 2024
Practical Completion / handover (RIBA 6)	December 2024
Home opens and in operation (RIBA 7)	January 2025

- 3.29 The project plan will be reviewed and updated as the project progresses and will be monitored through the Council's capital project governance processes to ensure the project meets required benefits and allocated budget.
- 3.30 The project plan includes a twin track approach to take into account the two potential operating models of the residential home. This includes the recruitment and registration of staff and managers for a local authority run residential home, and/or the commissioning of an external provider. Both options are scheduled to be completed prior to the funding deadline of March 2025 and the project plan will be updated when a decision about the operating model is made.

Procurement

- 3.31 The Council will appoint a Multidisciplinary Technical Advisory Organisation. They will provide project management services, design services, cost consultancy and Principal Designer services. This organisation will be procured using a quotation process and will deliver stages RIBA 1-7.
- 3.32 It is likely that further one-off appointments will be made throughout the project for specialist services such as surveys to ensure full details of any renovation works are completed sufficiently to obtain fixed prices from contractors.
- 3.33 The Contractor is proposed to be appointed using a Framework or a quotation process (value dependent). The contractor will be appointed using a JCT Contract and will commence works/services from RIBA 5 onwards.
- 3.34 Before invitations to tenders are sought from the contractors on the framework, an initial period of time is provided to the contractors to confirm their interest and whether the project can be delivered in the proposed timeline and budget. This gives both parties the opportunity to review in order to ensure expectations are measured before committing to tendering.
- 3.35 The above will consist of very low value, low value and medium value contracts. Proposals for tender opportunities will be issued via separate reports requiring approval.

Risks

- 3.35 A detailed risk register will be created for this project. However, the main risks to this project are:
1. Cannot identify a suitable home to purchase and convert in Brent within the capital funds available
 2. Unable to meet the DfE timescales for completion of the project
 3. Business case for 50% match funding is not approved by Cabinet
 4. Site identified for other Council requirements, causing the project to stop or be revised after development work has begun
 5. Local residents do not support the project resulting in delays during consultation which then impacts on construction
 6. Lack of interested contractors during procurement
 7. Increased demand within the construction industry meaning price increases above inflation leading to unaffordable projects and calls on additional financial contributions
 8. Planning approval not being granted

Assumptions

- 3.36 The following assumptions for this programme have been made:
- The Council grants the 50% match funding
 - The Council is able to procure necessary technical expertise at the timescales required to develop the project
 - The Council is able to recruit staff if it is decided in-house delivery is the preferred operation model
 - The Council is able to register the care home if it is decided in-house delivery is the preferred operation model
 - Or the Council can attract an external supplier to operate the care home if a commissioned service is the preferred operating model
 - Planning approval can be achieved

4.0 Financial Implications

Capital Cost Implications

- 4.1 The purchase and refurbishment costs of a Brent residential property in Table 3 below are based on current market prices. It should be noted that the property acquisition costs are indicative, and a cheaper property could be purchased, depending on the location and current condition. It is proposed these are maximum levels for the purposes of this outline business case and that the final required costs are confirmed as part of the full project business case once a suitable property is found.

Table 3	
Cost to be incurred	Estimated cost
Cost of 5 / 6 bed property	£1m to £1.5m
Fit out costs at £3000/m ²	£600,000
<i>Total cost</i>	<i>£2,000,000</i>
10% contingency	£200,000
Total cost	£2,200,000
DfE Capital sum	£1,100,000
Funding required from the Council	£1,100,000

- 4.2 Council officers successfully bid for capital funding of £1.1m from the DfE. This was under the assumption that the Council would fund 50% of the total project costs. This means the Council would need to fund £1.1m of the projected costs. There is no available capital funding and so the Council would need to borrow £1.1m. The borrowing costs for this are included in the running costs for the care home below.
- 4.3 It should be noted that the £1.1m is the maximum funding available from the DfE. If the project costs were to be lower than proposed in table 3, then the DfE funding will be 50% of these costs.

Revenue Cost Implications

- 4.4 The overall indicative annual cost of running the home is estimated to be £1.1m, with an average weekly running cost of £5,309 per placement assuming a four-bed home. The annual cost includes £0.9m for staffing costs for the home (registered manager, deputy manager, care staff, catering and business support staff) and £0.2m for maintenance and running costs, including payments towards the annual cost of borrowing. The weekly placement cost remains lower than the current average weekly residential costs paid to private providers by Brent.
- 4.5 The revenue budget modelling is built on the assumption that of the £7m current budget available to fund residential placements for children and young people, £1.1m will be diverted to cover the revenue cost of the Brent residential children's home. In summary, if a decision is taken to manage the residential care home in-house, the current placement budget will cover the estimated annual revenue cost.
- 4.6 The modelling assumes that the children and young people to be placed in the Brent residential home are those currently identified as living within high-cost placements. At a later stage, if a decision is taken to attract an external supplier to manage the home, there could be an additional cost for a management fee, which has not currently been factored into the revenue figures as this cost is not known.

Cost avoidance

- 4.7 The placements budget over the past few years has been under significant pressure because of factors such as inflationary increases, increased

complexity of children and young people's needs and competition within the market for places and emergency placements costing significantly more than the average. The decision to set up an in-house provision could enable the local authority to begin to manage down these pressures.

- 4.8 The projected estimated cost of running the home is estimated to be £5,309 per week at current prices. In 2022/23, the average weekly cost spent on placing a child in a residential private provision with complex needs was £7,739 while the average weekly cost of an emergency placement was £10,597 per week. If a child was placed in a Brent Council run home, the cost difference is estimated to be around £2,430 for a complex case and £5,288 for an emergency placement.
- 4.9 The modelling assumes that the residential children's home would support individuals for an average of 16 weeks. There will be options for children to have longer-term placements where this in line with their agreed care plan. The modelling assumption of 16-week placements would enable up to nine young people to be supported each year, with the fourth bed kept as an emergency placement bed. It is assumed that the in-house provision may not be fully occupied all year round so a 77% occupancy rate has been applied to the estimated cost avoidance figure.

5.0 Legal Implications

- 5.1 A children's residential care home run by Brent Council either 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.
- 5.2 Following submission of the bid to the DfE's Children's Home Capital Programme, the Council secured endorsement from individual Cabinet Members in relation to their portfolio area in consultation with the Leader in accordance with paragraph 13 of Part 3 of the Constitution, for the submission of bids for additional resources from government.
- 5.3 The Corporate Director of Children and Young People has delegated authority pursuant to paragraph 9.5 of Part 3 of the Constitution and Financial Regulation 8.2.2 of Part 2 of the Constitution to enter into a grant funding arrangement. In doing so, the Corporate Director must ensure that the objectives of the grant agreement are consistent with the Council objectives and priorities in accordance with Financial Regulation 9.1.2.
- 5.4 As the Council will be an accountable body in respect of grant funding and in accordance with Financial Regulation 9.1.1, the Corporate Director must only exercise delegated powers to enter into grant funding arrangements where the Corporate Director, Finance and Resources approves entry into such arrangement.
- 5.5 The DfE funding must be match funded on 50%/o50% basis as a minimum. As detailed at paragraph 6.2 approval would need to be sought through the

Council's governance process for the capital required to match fund, to include seeking Cabinet approval.

- 5.6 The development of a children's residential care home in accordance with this project business case would require the procurement of a range of construction and consultancy services contracts, all to be procured in compliance with the Council's Constitution and the Public Contracts Regulations 2015. If the intention is to outsource delivery of residential children's services, this would similarly be subject to such procurement requirements.

6.0 Equality Implications

- 6.1 The Council must, in the exercise of its functions, have due regard to the need to:
- a. eliminate discrimination, harassment and victimisation
 - b. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - c. foster good relations between persons who share a relevant protected characteristic and persons who do not share it

pursuant to s149 Equality Act 2010. This is known as the Public Sector Equality Duty.

- 6.2 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.
- 6.3 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.
- 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. The proposals set out in this report aim to ensure that there are sufficient and suitable residential care home placements for all Brent children and that their diverse and special educational needs are met.

7.0 Consultation with Ward Members and Stakeholders

- 7.1 The Cabinet Member for Children, Young People and Schools has been informed of these proposals.

- 7.2 Once the property has been identified and purchased, Ward Members will be kept up to date on the project progress including planning application submissions, works starting on site, etc.

8.0 Human Resources/Property Implications (if appropriate)

- 8.1 The operating model of the provision has not yet been determined. One option is for Brent is to run the residential home directly as is the case for the Ade Adepitan Short Break Centre. This is run under the Children's Homes (England) Regulations 2015 and the residential home would be run under the same regulations.
- 8.2 The property would be purchased from the open market (should any suitable existing Council property not be available). The Council would be the freeholder of the property. Should the provision be operated by a third party, a lease would be entered into with the provider for the maintenance and upkeep of the property.

Report sign off:

Nigel Chapman


Corporate Director of Children and Young People

Report sign off:

Minesh Patel

Corporate Director of Finance and Resources

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	Cabinet 22 May 2023
	Report from Corporate Director, Children and Young People
Post-16 Skills Resource Centre	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
No. of Appendices:	None
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Sharon Buckby Head of Inclusion and Virtual School Headteacher Sharon.buckby@brent.gov.uk Shirley Parks Director, Education, Performance and Strategy 020 8937 4259 shirley.parks@brent.gov.uk

1.0 Purpose of the Report

- 1.1 This report presents a proposal to develop a Post-16 Skills Resource Centre for young people and young adults with special educational needs. The proposed Post-16 Skills Resource Centre is outlined in the School Place Planning Strategy 2019-23 refresh, approved by Cabinet in November 2021, and is included within the local partnership SEND Strategy 2021-25.
- 1.2 A Post-16 Skills Resource Centre will support the Brent partnership to meet the preparation for adulthood duties as laid out in the SEND Code of Practice 2015, the SEND Review 2022 and as detailed in the Brent SEND Strategy 2021-2025. The Centre would support an improvement in outcomes for young people and young adults in Brent, in terms of education, employment or training, healthy lifestyles, community participation and independent living.
- 1.3 The intended approach is a Post-16 Skills Resource Centre that would operate from two sites. The Welsh Harp Centre would be developed to provide a horticultural facility with work experience and volunteering opportunities. The second site would be based in new facilities on the Airco Close site in Kingsbury. The intention is to develop facilities for a Post-16 Skills Resource

Centre alongside an expansion of special school provision, as agreed in the SEND Capital Programme, building on the synergies between the two developments.

2.0 Recommendations

That Cabinet

- 2.1 approves the development of the Welsh Harp Centre for a Post-16 Skills Centre as detailed in this report, on the basis of the funding model to meet the Welsh Harp Centre revenue costs as detailed in Section 4, recognising the invest to save benefits of the proposal.
- 2.2 agrees that £3m capital cost for the Welsh Harp project is funded from the High Needs Capital Grant.
- 2.3 agrees to delegate authority to the Corporate Director, Children and Young People, in consultation with the Lead Member for Children, Young People and Schools to approve the Capital Project Business Case.
- 2.4 agrees in principle to the proposal to develop the Airco Close site for both special school provision and the Post-16 Skills Resource Centre. This is subject to discussions with the Compass Learning Partnership and the London Regional Director for Education regarding satellite special school provision on the Airco Close site.
- 2.5 Notes that officers will return to Cabinet with a detailed business case for the Airco Close development proposal based on the outcome of feasibility work for the Post-16 Skills Resource Centre and special school provision.

3.0 Detail

- 3.1 Cabinet committed to supporting a Post-16 Skills Resource Centre in 2019 as part of the School Place Planning Strategy 2019-23, in recognition of the lack of in-borough provision for young people with complex learning difficulties. Developing a centre for young people aged 16-25 is reflective of related key national documents such as the SEND Code of Practice (2015), National Autism Strategy (2021), the National Disability Strategy (2021) and NHS Long Term Plan. The SEND highlights a need to focus on improving outcomes for older children and young people against preparation for later life and adulthood indicators.
- 3.2 At a local level the case for the development of a Post-16 Skills Resource Centre:
 - Responds to a lack of in-borough provision for young people with complex learning difficulties as set out in 2019-2023 School Place Planning Strategy November 2021 refresh
 - Aligns with local priorities consistent with the 2023-2027 Brent Borough Plan, the Brent SEND Strategy 2021-2025, the Brent Youth Strategy 2021-2023, the Brent Health and Wellbeing Strategy 2022-26 and priorities identified by the Integrated Care Partnership.

- Responds to the demographic context of increasing rates of young people with SEND in the borough as well as the high levels of these young people who are Not in Education Employment or Training (NEET) compared to the general population.
- 3.3 The proposed approach has been co-produced with young people and parents and carers. Themes that arose in the consultation were:
- young people's desire to be successful, to work and live independently.
 - the lack of opportunities for young people and young adults to fully participate in the opportunities that Brent gives them.
 - a wish for all young people to be active members of their communities.
- 3.4 A recurring theme during the consultation was that young adults with either SEND support needs or an ECHP did not have many options to access appropriate Preparation for Adulthood (PFA) support. Whilst all consulted wanted an inclusive society, it was felt that this age group had been overlooked. Very often the only option for young people or young adults when they leave school or college is to attend an adult social care day centre. Whilst this offers effective support for some, for many this means that they no longer have access to friends of their own age, access to specialist support and information for young adults that would prepare them for adulthood and a successful transition into meaningful employment. Young people confirmed the need for more inclusive/supported apprenticeships and paid employment opportunities specifically for young adults with disabilities.
- 3.5 There are increasing numbers of young people with SEND in Brent. In January 2023, 3223 children and young people had ECHPs compared to 2938 the previous year (an increase of 9.7%). Between 2022 and 2023 the number of EHCPs in the 11 - 15 age group increased by 11.7% and those in the 20 - 25 age group increased by 30.73%. The current cohort of 11-15 year-olds is 1038 compared to 931 in 2022. There are 567 16–19 year-olds and 285 20-25 year olds. The cohort of 16-25 year olds with SEND in Brent is expected to increase year on year, meaning that the offer for pathways into employment also needs to increase.
- 3.6 The proposed Post-16 Skills Resource Centre would complement the offer of the John Billam Resource Centre and the New Millennium Centre by providing a dedicated young adults' provision. The John Billam Resource and New Millennium Centres do not have the facilities or resources to support the needs of 16-25 year olds with SEND who need access to targeted activities and support to achieve PFA outcomes (currently 852 young people). Young people who reach the adult social care threshold by the age of 19, are usually connected to adult day centres (approximately 150 Adult Social Care service users are aged 17-30 and there are 200 disabled Children and Young People's Service users aged 16-25).
- 3.7 The proposed Post-16 Skills Resource Centre would provide access to the following:

- a) a one stop shop for enterprise, employment, education and training advice and guidance, volunteering, career pathway mapping, employability and enterprise training and support into work
- b) training and advice and guidance in relation to healthy living, keeping safe and healthy relationships and travel training
- c) testing out enablement equipment and clinical space for annual health checks, therapy, drugs and alcohol support, emotional wellbeing and mental health support
- d) a creative and cultural skills and independent living centre at the Airco Close site in Kingsbury, for example a digital media studio to develop skills and confidence in digital media, upskilling opportunities to progress into employment and self-employment in the digital economy and access to therapeutic and creative design development to support self-employment in the creative industries
- e) a horticultural centre based at Welsh Harp, with the horticultural land developed for operation in September 2023 using the existing accommodation and a new build programme completed by March 2024.

3.8 The Post-16 Skills Resource Centre would:

- Provide more residents within the community the opportunity to succeed in line with borough plan priorities.
- Improve economic activity for people with disabilities
- Improve health and wellbeing outcomes for young people and young adults
- Contributing towards the Council's goals of promoting social cohesion and inclusion
- Provide employers with opportunities to improve the diversity of their workforce and encourage inward grant funding opportunities.
- Achieve social value through economic investment in the local community.
- Increase participation rates of employment, education and training and greater take up and longevity of supported housing arrangements.

3.9 It is proposed that the Post-16 Skills Resource Centre operates from two sites. The Welsh Harp Centre would be developed to provide a horticultural facility with work experience and volunteering opportunities. The second site would be based in new facilities on the Airco Close site in Kingsbury, alongside an expansion of the special school provision that is delivered by the Compass Learning Trust. An expansion of special school places had previously been planned at The Village and Woodfield Schools. Use of the Airco Close site would facilitate the Compass Learning Trust developing 14+ pathways to employment for children with SEND. The intention is that the Compass Learning Trust also operates the Horticultural Facility at Welsh Harp to bring cohesion to the offer across the two sites. However, the lease would remain with the Council which would oversee the use of the site by third sector and community organisations, including the Scouts who have shown interest in operating from the site in partnership with the Council.

3.10 Delivery of the Post-16 Skills Resource Centre would be a partnership between the Council's Children and Young People's Department, the Compass Learning Trust, the Integrated Care Partnership and the third sector who will deliver the

range of skills identified in paragraph 3.8 and community organisations. To oversee the commissioning of activity and use of both sites for the Post-16 Skills Resource Centre, a Strategic Partnership Board would be established.

Proposed sites

Welsh Harp

- 3.11 The proposed Welsh Harp Horticultural Facility would provide training in horticulture, work experience, periods of volunteering and employment and enterprise development. This facility responds directly to the Borough Plan objectives 'The Best Start in Life' and 'A Healthier Brent'. The proposed facility would also respond to the Council's Climate Emergency Strategy 2021-2030, as it would provide opportunity for residents to be better connected to nature and enhance green spaces and biodiversity.
- 3.12 The Welsh Harp Facility would re-provide with input from the third sector the existing Environmental Education Centre that works with schools and volunteers, operating in tandem with the Welsh Harp Joint Consultative Committee and supporting development of a biodiversity centre. The facility would also support pupils from across Brent schools to engage in environmental science. It would also be able to support Brent in Bloom and the delivery of commercial contracts, again increasing the economic activity and visibility of younger residents with disabilities.
- 3.13 The Welsh Harp Centre could operate as a training centre for 5 days per week and at weekends and the evenings would open to the public for wider programme of activities including supporting residents to grow their own food and learn about healthy meals alongside wider environmentally based activities.
- 3.14 The current building is in poor quality and at the end of its lifespan and requires significant capital investment to replace. This proposal would enable the Environmental Education programme to schools to continue to be delivered as part of the wider building use alongside the Post-16 horticultural use. The capital project to replace the building is estimated to cost £3m. This would be funded from the SEND Capital Grant (see below).
- 3.15 Table 1 below proposes the high-level milestones to deliver the Welsh Harp new building. More detail will be included in the capital project business case for the project.

Table 1 – Capital Project Milestones

Milestone	Start	Finish
Welsh Harp Feasibility Study	July 2022	October 2022
Cabinet Approval of Post-16 Provision	November 2022	May 2023
Technical Consultancy Procurement and appointment	March 2023	May 2023
Design Work	May 2023	January 2024
Planning Application	November 2023	January 2024
Secure vacant possession of site	December 2023	February 2024
Contractor Procurement	January 2024	March 2024
Construction works	April 2024	December 2024
Building in operation	January 2025	January 2025
Overall Project Closure	December 2025	December 2025

3.16 As a revenue invest to save proposal, the Welsh Harp Centre would provide activities focused on contributing towards the following objectives, with funding allocated to activities that would directly impact on outcomes for Brent residents that can be tracked and reported on annually:

- a) Independent life and work skills training and support for the post-16 SEND population resulting in a reduction in HNB expenditure through, for example, a reduction in the number of EHCPs that are maintained as young people receive training that helps them to secure employment.
- b) the Public Health Outcomes Framework, and in particular indicators that improve the wider determinants of health / health inequalities, for example increasing employment opportunities for young adults with learning disabilities, addressing social isolation and loneliness and supporting the wider public to make healthy lifestyle choices. These indicators would be measured for young people and adults accessing the Centre.
- c) Adult Social Care measures, specifically the proportion of adults with a learning disability in paid employment, the proportion of people with a learning disability living in their own home or with family and the proportion of people who use services who have control over their daily life.
- d) NHSE outcomes including the employment of people with long-term conditions or who feel supported to manage their condition and the NHS Learning Disability and ASD long term plan.

Airco Close site

3.17 The proposal to develop a linked facility for secondary pupils with SEND (aged 14+) with a Post-16 Skills Resource Centre for those 16-25 would:

- a) Enable the expansion of special school places in the Compass Learning Partnership Trust, across The Village School and Woodfield School. Expanding the number on roll could provide the opportunity for students on roll in provision out of the authority to return to Brent to engage in a tailored curriculum rooted in preparation for adulthood. This would reduce HNB spend through cost avoidance on expensive out-of-borough placements.

- b) Pupils would be able to access a state of the art creative and cultural and independent living skills centre as part of their curriculum programme delivered in partnership with the third sector.
 - c) A 19+ curriculum offer could be developed drawing on funding from the DWP, HNB and the adult learning fund particularly for those young people unable to access Further Education provision and to expand the offer to young adults for supported employment.
- 3.18 The facility would be open from 2pm daily, over the weekend and through the holidays via third sector partners. The building would be designed to deliver safeguarding assurance. Third sector organisations would focus on developing skills for young people across a range of cultural and creative environments, employability skills and entrepreneurial skills to meet the objectives of the Post-16 sector as set out above. A mock studio and training kitchen would support training in independent living skills. A small area would be allocated for timetabled drop-in advice sessions from across education, health and care, alongside a youth meeting space. The Brent Parent/Carer Forum would be able to access office space. The intention would be to support third sector providers to deliver the offer utilising NCIL grant funding or through external funding bids.
- 3.19 The Post-16 Skills Resource Centre would maintain a central objective of developing the confidence and skills of young people and young adults to become visibly active members of society and to be economically active, meeting Adult Social Care, Public Health and NHSE outcomes.
- 3.20 Expansions of The Village School and Woodfield School form part of the SEND Capital Programme approved by Cabinet in January 2022. Officers are liaising with the Compass Learning Partnership, including the two schools, and the DfE Regional Director to confirm if the Airco Close site proposal is workable in place of the school expansions of the Village School and Woodfield School that were agreed as part of the SEND Capital Expansion Programme by Cabinet in January 2023 (120 places).
- 3.21 Upon conclusion of the liaison with the stakeholders listed in paragraph 3.20 and feasibility work on the capital project proposal, it is expected a detailed business case proposal will be drafted and presented to Cabinet for consideration. If the proposal is viable, it is expected that the capital costs will be funded via the allocated SEND Capital Programme funding for the Village School and Woodfield School expansions and Strategic Community Infrastructure Levy (SCIL).

4.0 Financial Implications

Capital Implications

- 4.1 Table 2 details the expected capital costs for the Welsh Harp site. It is proposed that this is funded by the High Needs Capital Grant. Brent Council has been allocated £7.4m High Needs Capital Allocation. The proposal is to use £3m from the Capital allocation, leaving £4.4m for future SEND requirements, such

as the expansion of places on the Airco Close site or further expansions of additionally resourced provisions in mainstream schools.

Table 2 Capital Project Costs

Element	Cost (£m)
Construction	2.00
Fees/Professional Services	0.24
Surveys	0.05
Statutory Costs	0.01
FF&E and ICT	0.40
Sub-Total	2.70
Contingency	0.30
Total	3.00

- 4.2 The indicative costs above include for the horticultural elements and the proposed new building. Current costs include for demolition of the current Environmental Centre and this area can be returned to open space once the new centre is complete.

Revenue Implications

- 4.3 Table 3 details the projected revenue costs for the Welsh Harp development and the staffing to oversee both the sites. While Table 3 details the additional cost for the High Needs Block from the project, this is expected to be offset by increased opportunities for employment leading to a higher number of Education Health and Care Plans (EHCP) being ceased. This is the main cost driver within the High Needs Block. Increased employability would also positively impact on wider public sector funding by reducing health inequalities for young adults with disabilities. This is effectively an invest to save project.
- 4.4 There will be additional costs for the delivery of the accredited provision that is expected to be delivered through the provider income stream and from the High Needs Block, Direct Payments, Adult Learning Fund and external grant income.
- 4.5 The High Needs Block will meet the revenue costs of the Post-16 Centre as an invest to save project. However, as the design develops and the outcome measures are confirmed, opportunities for a grant contribution from Adults Social Care and Public Health will be explored.

Table 3: Revenue costs

Brent Council Estimated Costs	2023/24	2024/25	2025/26	2026/27	2027/28
	£	£	£	£	£
Senior Capital Project Manager (funding secured through Covid Recovery Initiative)	82,848	0	0	0	0
Supported Employment Development Manager across both sites	85,934	88,512	91,167	93,902	96,719
Caretaker across both sites	47,872	49,253	50,731	52,253	53,820
Security (eve, weekend, holiday)	47,872	49,253	50,731	52,253	53,820
Existing project officer - no additional cost					
TOTAL Staffing costs excluding Senior Capital Project Manager	181,678	187,018	192,628	198,407	204,360
Welsh Harp	2023/24	2024/25	2025/26	2026/27	2027/28
	£	£	£	£	£
Maintenance Costs (based on 3% increase pa from 2024/5)	30,000	77,250	79,568	81,955	84,413
Income - Horticultural Centre Revenue	-32,000	-66,000	-66,000	-66,000	-66,000
Subtotal	43,000	11,250	13,568	15,955	18,413
Education centre activity costs	20,000	20,000	20,000	20,000	20,000
Income - revenue for activity costs via grants and direct payments	-15,000	-80,000	-75,000	-75,000	-75,000
Subtotal	-15,000	-30,000	-55,000	-55,000	-55,000
Horticultural/Welsh Harp net	48,000	-18,750	-41,433	-39,045	-36,587
TOTAL REVENUE COSTS	229,678	168,268	151,196	159,362	167,773
Direct Grants	2023/24	2024/25	2025/26	2026/27	2027/28
	£	£	£	£	£
Grant income from DFE - supported employment officer	-20,000	-20,000	0	0	0
TOTAL GRANT INCOME*	-20,000	-20,000	0	0	0
Total Costs to the HNB	209,678	148,268	151,196	159,362	167,773

*Opportunities for a contribution from ASC and PH will be explored as the project develops.

- 4.6 There will be maintenance costs for the Airco Close site. However as this will be primarily a school facility with shared use for 16-25 year olds, an agreement will need to be established with the Compass Learning Trust to minimise any additional costs to the local authority or to the voluntary sector delivering provision for the older age group. It is envisaged that access will be through a peppercorn lease arrangement with the Trust.

5.0 Legal Implications

- 5.1 The Children and Families Act 2014 introduced a new legislative framework for children and young people aged 0-25 with SEND. It brought in a single system of integrated Education, Health and Care Plans (EHC plans) to cover all students from 0-25 years of age. The reforms aimed to increase protection for young people with SEND and to promote a greater focus on outcomes and

preparing for adulthood. The Code of Practice 2015 (COP) provides statutory guidance on duties, policies and procedures.

- 5.2 As detailed within this report, the Council will be responsible for obtaining all necessary approvals to undertake the capital projects including planning approval.
- 5.3 The project will require the procurement of very low, low and medium value services and works contracts. All procurement will be conducted in accordance with Contract Standing Orders and Public Contract Regulations 2015 (PCR). Corporate Directors have delegated authority under the Constitution to procure and award contracts for Services and Supplies under £2M and for Works under £5M.

6.0 Diversity Implications

- 6.1 Pursuant to s149 of the Equality Act 2010 (otherwise known as 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
 - 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 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.
- 6.3 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.
- 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. The proposals set out in this report aim to ensure that there are sufficient and suitable school places and training activities for all Brent children and that their diverse and special educational needs are met.
- 6.5 The equality implications associated with the School Place Planning Strategy 2019-2023 were set out in the report to Cabinet to approve the same (November 2018). This report considers more specifically the needs of young people and young adults with a disability post-16.

7.0 Consultation with Ward Members and Stakeholders

- 7.1 The Cabinet Member for Children, Young People and Schools has been informed of these proposals.
- 7.2 Officers met with Ward members for Welsh Harp in September 2022 following a request from the Ward Members to discuss the long-term future of the Welsh Harp Environmental Education Centre. The current situation and risks to the centre were discussed as well as the above proposal as a potential way to continue the centre, subject to Cabinet approval. A further meeting was held in March 2023 to discuss plans for the site and community and voluntary sector access.
- 7.3 The proposals have been co-produced with Brent residents as part of the SEND Strategy, with detailed planning with the Brent Parent Carer Forum, young people advisors and Children's Trust partners. A steering group comprising Brent Parent/Carer Forum, young people and representatives from Brent Children's Trust led a consultation process with parents and carers and young people to explore their experiences of the provision currently available for young people aged 16-25.
- 7.4 Meetings have been held with Brent Scouts and other interested community and voluntary sector organisations who are interested in operating from the Welsh Harp site alongside the Post-16 Skills Resource Centre, for example in evenings and weekends. Further consultation will be undertaken as the proposals develop, including with third party organisations that would like to deliver services from the Welsh Harp site to support the wider community.

8.0 Human Resources/Property Implications

- 8.1 A Development Manager would be in post from 2023/24 and would be responsible for developing the offer at Welsh Harp, the wider partnership and third sector offer. From the point of project approval, a senior project manager would be appointed to deliver the project working to the Head of Inclusion. Job roles and grades will be subject to job evaluation.
- 8.2 From a Property Perspective, there are two commercial tenants occupying the Environmental Education Centre and an adjacent building, Planet House.
- 8.3 Thames21 occupy the Environmental Education Centre on a 7 year lease which expires in December 2023. This lease covers the area of the proposed Horticultural Centre as well as occupation of a room for office use in Planet House. The Council's intention is to secure vacant possession from Thames21 upon lease expiry in order to handover the site to the contractor to commence the construction of the horticultural centre and replacement environmental education centre.
- 8.4 O.C. Building Services occupy Planet House under a lease that expires in July 2029. Officers are currently in discussions with O.C. Building Services about their long-term plans for the use of this building.

- 8.5 The Airco Close site was subject to a Cabinet report in February 2023. Cabinet approved the transfer of a 999 year lease to the Council from the developer as part of a S106 agreement to provide a primary school on the wider former Oriental City development. Any development that differs from the s106 agreement would require landlord approval although the terms of the lease allows for consent to not be unreasonably withheld.

Report sign off:

Nigel Chapman

Corporate Director of Children and
Young People