



# Brent

## Cabinet

**Tuesday 28 May 2024 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 (Vice-Chair)

Donnelly-Jackson

Farah

Grahl

Knight

Nerva

Rubin

Krupa Sheth

Tatler

Leader of the Council

Deputy Leader and Cabinet Member for Finance & Resources

Cabinet Member for Resident Support & Culture

Cabinet Member for Public Safety & Partnerships

Cabinet Member for Children, Young People & Schools

Cabinet Member for Housing

Cabinet Member for Community Health & Wellbeing

Cabinet Member for Employment, Innovation and Climate Action

Cabinet Member for Environment & Enforcement

Cabinet Member for Regeneration, Planning & Growth

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

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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**

**1 Apologies for Absence**

**2 Declarations of Interest**

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

**3 Minutes of the Previous Meeting** 1 - 10

To approve the minutes of the previous Cabinet meeting held on Monday 8 April 2024 as a correct record.

**4 Matters Arising (if any)**

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

**5 Petitions (if any)**

To consider any petitions for which notice has been received, in accordance with Standing Order 66.

Members are asked to note that the following petition is due to be presented at the meeting:

- (a) Calling on Cabinet (as part of the decision due to be made on the award of contract for the Bobby Moore Bridge Advertising Lease) to only award a lease for advertising on the parapets of the bridge, and not on the walls of the subway, so that the heritage tile murals on those walls can be put back on public display.

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

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

**Partnerships, Housing & Resident Services reports**

**7 Authority to Award Contract for Bobby Moore Bridge Advertising Lease** 11 - 26

This report seeks approval for award of a contract relating to renewal of

the advertising lease for the Bobby Moore Bridge, which expires at the end of August 2024.

**Ward Affected:** Preston;  
Wembley Park

**Lead Member:** Leader (Councillor Muhammed Butt)

**Contact Officer:** Rob Mansfield  
Head of Communications, Conference and Events  
020 8937 4229  
[rob.mansfield@brent.gov.uk](mailto:rob.mansfield@brent.gov.uk)

**8 Brent Household Support Fund 2024** 27 - 74

This report seeks approval for the allocation and the distribution of the Household Support Fund extension funding, which runs from 1 April 2024 to 30 September 2024.

**Ward Affected:** All Wards

**Lead Member:** Cabinet Member for Resident Support & Culture (Councillor Fleur Donnelly-Jackson)

**Contact Officer:** Thomas Cattermole, Director - Residents Services  
Tel: 020 8937 5446  
[thomas.cattermole@brent.gov.uk](mailto:thomas.cattermole@brent.gov.uk)

**Neighbourhood & Regeneration reports**

**9 Review of Brent's Conservation Areas** 75 - 134

This report details the representations received on a consultation relating to a series of proposed changes to Brent's Conservation Areas and, following consideration of the outcome of the consultation process, seeks approval to the changes outlined including de-designation, extension to boundaries and designation and associated making of and removing Article 4 Directions.

**Ward Affected:** Brondesbury Park;  
Cricklewood & Mapesbury;  
Harlesden & Kensal Green;  
Kenton;  
Kingsbury;  
Northwick Park;  
Queens Park;  
Willesden Green

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

**Contact Officer:** Mark Price, Principal Heritage Officer  
020 8937 5236  
[mark.price@brent.gov.uk](mailto:mark.price@brent.gov.uk)



This report provides an update on the development of the Brent Active Travel Implementation Plan 2024-2029 (ATIP), including details of the feedback received from the recent public consultation and stakeholder engagement exercises on the draft plan and makes recommendations for minor additions/changes to be made to strengthen the plan, prior to adoption.

**Ward Affected:** All Wards  
**Lead Member:** Cabinet Member for Environment & Enforcement (Councillor Krupa Sheth)  
**Contact Officer:** Tim Martin, Transportation Planning Manager, Spatial Planning  
 020 8937 6134  
[Tim.Martin@brent.gov.uk](mailto:Tim.Martin@brent.gov.uk)

## 11 Draft Staples Corner Growth Area Masterplan and Design Code Supplementary Planning Document 269 - 290

This report presents the draft Staples Corner Growth Area Masterplan and Design Code Supplementary Planning Document (SCGA Masterplan SPD) for approval prior to publication and statutory consultation.

**Ward Affected:** Dollis Hill  
**Lead Member:** Cabinet Member for Regeneration, Planning & Growth (Councillor Shama Tatler)  
**Contact Officer:** Jonathan Kay, Head of Regeneration  
 020 8937 2348  
[Jonathan.Kay@brent.gov.uk](mailto:Jonathan.Kay@brent.gov.uk)

### Children and Young People reports

## 12 Outcome of Formal Consultation on School Organisation Proposals for Leopold Primary School in Primary Planning Area 4 291 - 320

This report provides a summary of the formal consultation undertaken between 29 February 2024 and 28 March 2024 on the proposal to implement a phased closure of the Gwenneth Rickus site of Leopold Primary School.

**Ward Affected:** Roundwood, Stonebridge  
**Lead Member:** Cabinet Member for Children, Young People & Schools (Councillor Gwen Grahl)  
**Contact Officer:** Shirley Parks, Director - Safeguarding, Partnerships and Strategy  
 Tel: 020 8937 4529  
[Shirley.Parks@brent.gov.uk](mailto:Shirley.Parks@brent.gov.uk)

### 13 Exclusion of Press and Public

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

Agenda Item 7: Authority to award contract for Bobby Moore Bridge Advertising lease – Appendix 1: Advertising lease bid evaluation

This appendix has been classified as exempt under Paragraph 3 of Part 1 Schedule 12A of the Local Government Act 1972, namely: "Information relating to the financial or business affairs of 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 Deputy Director Democratic Services or their representative before the meeting in accordance with Standing Order 60.

**Date of the next meeting: Monday 17 June 2024**



- 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 8 April 2024 at  
10.00 am

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

Also present: Councillors Hirani & Maurice

#### 1. **Apologies for Absence**

Apologies for absence were received from Councillor Krupa Sheth (Cabinet Member for Environment, Infrastructure & Climate Action) and Rachel Crossley (Corporate Director Care Health & Wellbeing) with Claudia Brown (Director Adult Social Care) attending as her representative.

#### 2. **Declarations of Interest**

No declarations of interest were made during the meeting.

#### 3. **Minutes of the Previous Meeting**

Cabinet **RESOLVED** that the minutes of the previous meeting held on Monday 11 March 2024 be approved as a correct record.

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

None.

#### 5. **Petitions (if any)**

##### **5.1 Traffic Calming Measures and Traffic Restrictions on Chamberlayne Road, Kensal Green, NW10**

Councillor Muhammed Butt (as Leader of the Council) welcomed Fiona Mulaisho (as Chair of the Kensal Rise Residents Association) to the meeting, who had been invited to speak in support of a petition containing over 250 signatures highlighting a number of safety concerns relating to the volume and speed of traffic along Chamberlayne Road, Kensal Green, NW10 and seeking additional traffic calming measures designed to improve pedestrian safety and reduce overall volumes of traffic. In welcoming the opportunity to speak on behalf of local residents, Fiona Mulaisho, began by drawing attention to the number of personal injury accidents recorded along the road between 2020 – 2023. Whilst welcoming the measures introduced to enhance traffic flow and road signage in the area, in support of the Kensal Rise Corridor Scheme, she advised the petition was calling on the Council to conduct a more detailed local traffic review and implement additional traffic

calming and safety measures along Chamberlayne Road, particularly given the proximity of local schools in the area and in support of proposals formulated by local residents designed to provide a practical solution to the concerns identified.

Councillor Nerva (Cabinet Member for Public Health and Adult Social Care and local ward councillor for Queens Park) also spoke in support of the petition and action being sought by residents to address the concerns identified. As part of the approach outlined, Councillor Nerva highlighted the need to encourage enhanced police enforcement of the existing 20mph zone in the area and also expressed support for the potential establishment of a community road watch scheme by local residents working in partnership with the police, along with enhance signage as additional speed management initiatives. Whilst recognising that part of the area had already been included within the wider Queens Park Neighbourhood Traffic Study, Councillor Nerva advised he would also be keen to encourage the involvement of Transport for London (TfL) in a wider review of traffic and transport issues focussed on the southern part of the borough as part of a package of measures designed to address the concerns highlighted, including air quality.

In response, Councillor Muhammed Butt (responding as Leader of the Council on behalf of Councillor Krupa Sheth - Cabinet Member for Environment, Infrastructure and Climate Action) firstly thanked Fiona Mulaisho for attending Cabinet and all those who had signed the petition for taking the time to ensure their views were represented and assured residents that the safety concerns raised had been acknowledged with the Council committed, working within available resources, to the enhancement and improvement of road safety across the borough. Given the reference to speed management and enforcement issues he also advised that the concerns relating to Chamberlayne Road would be raised with the local police Safer Neighbourhood Team for further review and consideration. Whilst recognising the concerns highlighted, and specific measures being sought by local residents including the installation of speed cameras, Councillor Muhammed Butt felt it important to highlight the limited funding available to the Council to prioritise these measures given the significant reduction in funding TfL were now able to provide under their annual Local Implementation Plan (LIP) programme along with the role of TfL in prioritising and managing the installation of speed cameras, the programme for which had currently been paused. Notwithstanding this position, Councillor Muhammed Butt advised that the Council would continue to work with TfL to highlight the concerns identified and encourage consideration of the area as a priority once the programme resumed, including roll out of an e-bus fleet. Alongside this, the Leader advised that the Council would also continue investigating a number of improvements in the area including the introduction of new road markings and signage to improve visibility of pedestrian crossing points and make drivers aware of the need to slow down and observe the 20mph restrictions, with a further assessment of accident data in considering options for funding as part of the 2025-26 programme of traffic safety works also proposed.

## **5.2 Installation of Pelican Crossing between Kenton Road, Kenton Lane & Woodcock Hill**

Councillor Muhammed Butt (as Leader of the Council) then moved on to welcome Gail Hovey (Science College Project Manager at St Gregory's Catholic Science College, Kenton & Secretary Kenton Area Traders' Association) who had been invited to speak in support of a petition containing 657 signatures highlighting a

number of concerns relating to road and pedestrian safety and supporting the installation of additional safety measures, including a pedestrian crossing at the junction of Woodcock Hill, Kenton Lane and Kenton Road. In addressing Cabinet, Gail Hovey began by pointing out that the petition was also supported by Councillors Hirani & Maurice (as local ward councillors) and a number of schools and members of the local community in the surrounding area and advised of her school's active involvement in the TfL Travel for Life scheme, for which they were due to achieve Gold Accreditation by the end of the academic year. Reference was also made to an extract from a letter written by Year 11 pupils to the local MP detailing concerns relating to the safety and confidence of pupils and pedestrians having to cross roads in the immediate vicinity of the school and supporting the installation of a pedestrian crossing at all four of the crossroads at the Kenton Road, Kenton Lane and Woodcock Hill junction. Highlighting recent accident data, members were advised that the petitioners did not feel the current pedestrian crossing, which only served one side of the junction, was sufficient due to its placement and confusing road markings.

Referring to the outcome of a recent study conducted by the Council's Healthy Streets and Parking Team, which had concluded that whilst it may be possible to install enhanced pedestrian facilities in the area these would require additional funding and further consultation with TfL and Harrow Council (given the potential impact on the current road network and buses) Gail Hovey advised the petitioners were seeking a more detailed local study to understand the impact on all road users, including pedestrians. Whilst welcoming the proposed installation of an additional pedestrian crossing on Woodcock Hill the petitioners felt that this would only address part of their concerns with members advised of the significant number of pupils (24%) attending St Gregory's Catholic Science College who still travelled by car given concerns about the safety of them using public transport, cycling or walking to school and number of additional pupils (17%) who had advised cycling would be their preferred mode of transport if it was felt safer for them to do so.

In concluding, Gail Hovey advised the petitioners were seeking further consideration of the way in which pedestrian safety could be improved in the area by implementing additional traffic calming and reduction measures whilst also encouraging the use of more active modes of travel including the introduction of cycle lanes on the wide pavements along Kenton Road and installation of a controlled pedestrian crossing facility to all sections of the Woodcock Hill, Kenton Lane and Kenton Road junction. Confirmation was also sought on the allocation of funding within the Local Implementation Programme (LIP) for pedestrian safety improvements on Kenton Road and whether this was the funding allocated for the pedestrian crossing on Woodcock Hill.

In response, Councillor Muhammed Butt (again responding as Leader of the Council on behalf of Councillor Krupa Sheth - Cabinet Member for Environment, Infrastructure and Climate Action) thanked Gail Hovey for attending Cabinet and all those who had signed and were supporting the petition for highlighting the concerns expressed in relation to the safety of pedestrians crossing the junction of Kenton Road with Woodcock Hill and Kenton Lane. Whilst recognising the concerns highlighted and specific measures being sought by local residents, Councillor Muhammed Butt felt it important to once again highlight the limited funding available to the Council to prioritise these type of measures, given the significant reduction in funding TfL were now able to provide under their annual Local Implementation Plan

(LIP) programme and number of requests being received. The role of TfL in the management and maintenance of traffic signals across London was also outlined which, whilst focussed on the impact and benefits in relation to accident reduction at specific locations, would also need to include consideration of the impact on the surrounding road and traffic network and bus journey times.

In response to concerns raised relating to road safety and the absence of controlled pedestrian crossing facilities for all sections of the junction the Council had secured funding, as part of its 2023/24 LIP programme, to commission a feasibility study for the introduction of new pedestrian facilities at the junction which had included pedestrian and traffic surveys as well as modelling to identify potential impacts on network performance. Whilst the study had identified that it may be possible to introduce pedestrian facilities on the three arms of the junction where they were currently absent this would be likely to involve significant utility works on Kenton Lane that could increase delays to traffic and buses on Kenton Road and lead to traffic displacement on residential streets. As a result, a further assessment had been undertaken to investigate the option of providing a single additional pedestrian facility at the junction over Woodcock Hill, which had been identified as possible. Further detail would, however, need to be provided following the meeting on the specific use of the LIP funding identified for pedestrian safety improvements on Kenton Road referred to by Gail Hovey during her presentation.

Whilst confirming that the Council would continue to work with TfL in order to highlight the funding priorities and needs across the borough, including the possibility of securing the additional pedestrian crossing facilities at the requested sections of the Woodcock Hill, Kenton Lane and Kenton Road junction it was pointed out that the process could take between 12-18 months to complete, based on a potential public consultation held towards the end of the year meaning any subsequent improvements would be unlikely to be programmed until Autumn 2025. In the meantime, however, he ended by highlighting that the Council would continue to explore the possibility of making further improvements to the road markings and signage at the junction along with the phasing of the existing traffic signals designed to improve the visibility of the pedestrian crossing points and provide advanced warning for motorists of pupils travelling to and from school. Support would also continue to be provided for the school in developing their active travel plan and enhancing active travel measures in the area.

### **5.3 Objection to the Academisation of Byron Court Primary School**

As the final petition to be presented at the meeting, Councillor Muhammed Butt (as Leader of the Council) then moved on to welcome Matt Paul, who joined the meeting as an online participant (representing the Support Byron Court Campaign Group a coalition of parents and staff from Byron Court Primary School) and been invited to speak in support of a petition with over 1300 signatures seeking to oppose and stop the academisation of Byron Court Primary School in response to the school having been inspected by Ofsted in November 2023 and judged by them to be inadequate. In addressing Cabinet, Matt Paul highlighted a number of concerns relating to the inspection process, pointing out that the final judgement was not felt to reflect the experiences of many parents or a majority of staff at the school with no consideration also given to the context in which the inspection had occurred given the major changes in school leadership, disruption caused by the pandemic and forthcoming changes to the Ofsted inspection process itself.

Of greater concern to the petitioners, however, was the automatic process of academisation introduced by the Government for any local authority school rated as inadequate, which had now commenced at Byron Court and was opposed by almost two-thirds of parents and the majority of staff. In highlighting the lack of any formal influence by parents and staff in relation to this process, concerns were also raised in relation to the Multi Academy Trust (Harris Federation) selected by the Department for Education (DfE) to take over the running of the school due to their limited local presence and connection to Brent, approach towards pupil behaviour management and industrial relations. As a result, it was felt the approach adopted would risk the loss of what was felt to be an inclusive and happy learning environment and school community alongside the loss of many staff and ultimately the current identity of the school. Referring to the fact Ofsted had affirmed their commitment, as part of their Big Listen public consultation, to prioritise the interests of children and learners in addition to considering the long-term impact of inspections, Matt Paul advised the petition was calling for a reinspection of Byron Court School under any revised inspection framework, recognising the new leadership structure now established within the school and improvements implemented since the previous inspection alongside new Ofsted guidance (published shortly after the last inspection).

To conclude, Matt Paul thanked Councillor Grahl (as Cabinet Member for Children, Young People and Schools) for her support of their campaign which he pointed out had also been backed by the local MP with the petition calling on the Education Secretary to provide the school with sufficient time to make any further necessary improvements. Whilst recognising the legal obligations on the Council, the petition was also seeking support from the Council, as part of their commitment towards promoting and protecting community schools, to support the efforts being made to save Byron Court School based on the following specific actions:

- (1) To provide or support the recruitment of additional members of school leadership staff, recognising the immediate lack of capacity and significant pressures faced by existing staff.
- (2) To ensure that joint work via the Rapid Improvement Group was both succeeding and also being monitored.
- (3) To lobby the DfE and Ofsted to reinspect the school to reflect recent improvements and delay the Academy Order being implemented (which had also been supported by both Barry Gardiner as local MP and the NEU General Secretary) for which there had been previous precedents set involving a number of schools having their Orders withdrawn.

In response, Councillor Grahl (as Cabinet Member for Children, Young People and Schools) thanked everyone involved in support of the petition and recognised the level of concern highlighted in relation to the Ofsted inspection and accompanying process. As a local authority, Councillor Grahl assured the petitioners of the Council's commitment to seeing all schools excel and the provision of outstanding education for all children across the borough recognising the level of concern and anxiety arising from the outcome of the recent Ofsted inspection and rating of the Byron Court Primary School as inadequate. As a result, an assurance was provided of the support being provided to staff and parents at the school in order to

clarify the process and deliver the improvements identified. The work being undertaken to support these improvements was also highlighted in terms of the Rapid Improvement Group which had been established in September 2022 and had been providing structured support to the school across many areas including Early Years, Safeguarding, SEND, leadership and pupil progress. This had also been supported by the recruitment of new governors and building of additional leadership capacity that would be in place following the Easter holiday period with the Council also continuing to meet regularly with the school's senior leadership team in order to advise and monitor the implementation of improvement measures. Whilst the aim of these measures had been to support the school in moving forward, the outcome and timing of the Ofsted inspection had unfortunately resulted in the automatic imposition of an Academy Order by the Secretary of State for Education.

In pointing out this had not been a local authority decision, members were reminded of the legal obligation placed on the Council to take all reasonable measures to facilitate and not seek to oppose or delay the academisation process with little input available over the timing for this or any future inspection. Nevertheless, in acknowledging the injustice felt by many parents and staff, Councillor Grahl advised that she had written to the London Advisory Board, urging them to consider delaying academisation in order to allow time for the school to embed improvements and be re-examined, with disappointment expressed at the lack of response and decision of the Board to proceed despite the widespread opposition to the academy order.

Furthermore, Councillor Grahl expressed her concern at the way in which this process had highlighted what she felt to be the undemocratic and counteractive nature of current education policy and lack of trust in the current way the Ofsted process, both in terms of pressure on staff and the use of single word judgements to assess the running of schools, which was no longer felt to be fit for purpose. As a result, she highlighted her support for the abolition of these single word judgements and complete overhaul of the inspection regime including the forced academisation of schools, on which she would continue to lobby for a change in legislation and approach.

Whilst recognising the role played by academies in delivering education across Brent and excellent relationship with those academies already operating in the borough, Councillor Grahl advised the Council was also aware of the legitimate concerns about how the process affecting Byron Court would affect the ethos, character and inclusive nature of the school. As a result, she advised assurance would continue to be sought from the new academy trust on how these concerns would be addressed with the Council continuing to be a strong advocate for both inclusivity and good terms and conditions for staff moving forward.

In concluding her response, Councillor Grahl assured the petitioners and campaign group of the Council's full commitment, despite the current academisation proposals, to support the work relating to the ongoing improvement of Byron Court School recognising its unique character as a community school in offering a safe, happy and fulfilling education for its pupils.

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



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

## 7. **EDI Strategy 2024 - 2028**

Councillor Donnelly-Jackson (Cabinet Member for Customers, Communities & Culture) introduced a report presenting the Council's new Equity Diversity and Inclusion (EDI) Strategy for the next four years 2024-28 and supporting components including the engagement findings report, Corporate Anti-Racism Action Plan, the UNISON Anti-Racism Charter and London Local Government Anti-Racism Statement. The report also outlined next steps in relation to driving the Council's ambitions through a new Equity, Diversity & Inclusion (EDI) Board and establishing an EDI dashboard of performance indicators to monitor progress.

In considering the report Cabinet noted the commitment within the strategy to tackle inequalities and support individuals and families and Council's workforce in reaching their full potential recognising the need to celebrate, engage and empower the diverse range of local communities represented across the borough to work together in terms of delivering the overarching focus of the strategy around "inclusivity". In outlining the extent and comprehensive nature of consultation and engagement in development of the strategy, members were advised that the core objectives identified as a result had been as follows:

- Inclusion: Accessibility & Cohesion
- Narrowing the Gap: Tackling Inequalities
- Establishing an Inclusive Workforce - which members were advised moved beyond diversity representation and was focussed in fostering an inclusive work environment.

In commending the strategy to Cabinet, Councillor Donnelly-Jackson ended by thanking all those involved in the engagement process and development of the strategy given the focus in seeking to further advance equality of opportunity, foster good community relationships and ensure Brent remained an inclusive borough on which the outcomes being delivered as a result would be monitored on a regular basis.

Members welcomed development of the EDI strategy alongside the Corporate Anti-Racism Action Plan, which it was noted formed a key component in terms of the overall framework and delivery of the ambitions and objectives outlined. Support was also expressed for the work being undertaken to establish a formal monitoring process and range of Performance Indicators that would be used to monitor progress through the newly established EDI Board, with members keen to ensure the associated work linked to delivery of the strategy was supported through the provision of necessary funding support.

In commending the comprehensive nature of the strategy, members further welcomed the specific inclusion of a focus around health inequalities (in partnership with health providers and recognising the work of Brent Health Matters) and also the activity proposed to address disproportionality in relation to attainment levels for vulnerable groups including looked after children, children and young people with

special educational needs and children of specific ethnicities in partnership with schools, as part of the objective relating to Narrowing the Gap: Tackling Inequalities. Support was also expressed for the activity outlined in seeking to sign up to both the UNISON Anti-Racism Charter and also London Local Government Anti-Racism Statement.

In thanking all those involved for their work in development of the EDI Strategy Cabinet **RESOLVED**:

- (1) To endorse the EDI Strategy 2024-28 and Corporate Anti-Racism Action Plan (as detailed within Appendices A and B of the report).
- (2) To endorse signing up to the UNISON Anti-Racism Charter and London Council Anti-Racism Statement (as detailed within paragraph 3.2.15 of the report) as tools that would further complement the Council's ambitions and commitment around anti-racism.

## 8. **Sudbury Town Neighbourhood Forum Application for Neighbourhood Forum Status**

Councillor Tatler (Cabinet Member for Regeneration, Planning & Growth) introduced a report detailing the responses received to a consultation undertaken on an application for Sudbury Town Neighbourhood Forum status and seeking a decision on the subsequent designation of the Sudbury Town Neighbourhood Forum.

In presenting the report, Councillor Tatler reminded members of the original background behind the introduction of neighbourhood planning which had been to provide residents and businesses in a specific area with the opportunity to engage in the identification of localised planning policies designed to assist in shaping development outcomes across the relevant area. Where local communities wanted to take up these opportunities there was a requirement to establish a Neighbourhood Forum as the relevant "qualifying body" with a requirement for Forum status to be renewed every five years. In reminding members of the background and history to establishment of the original Forum and decision taken in November 2023 to refuse an application from Sudbury Town Residents Association (STRA) for renewal of their Forum status, Cabinet were advised of the progress which it had subsequently been possible to make in taking forward an alternative application for Sudbury Neighbourhood Area Forum status received from "Sudbury Matters" with support from independent consultants (Urban Vision). As an outcome of that process a revised application had been submitted under the amended title of Sudbury Town Neighbourhood Forum applying to the same geographical area as the original Sudbury Neighbourhood Area.

As required, the current application had been subject to a statutory consultation process which had run from January – February 2024 with a summary of the responses detailed within Appendix A of the report. On the basis of the outcome of the consultation process and time which had passed since the decision to refuse renewal of STRAs application, members were now being asked to consider designation of Sudbury Town Neighbourhood Forum for Neighbourhood Forum status.

Members were supportive of the approach outlined, having noted the constructive nature of engagement with the Sudbury Town Neighbourhood Forum in seeking to progress their application, way in which the application had met the relevant criteria for consideration and positive nature of the responses received as part of the consultation process indicating strong support for the Forum to represent the area.

Officers were thanked for their work in seeking to progress the Neighbourhood Forum application and in welcoming the collaborative and constructive nature of the relationship with the prospective Forum along with their openness and willingness to represent the whole community in seeking to improve the locality it was **RESOLVED** having considered the responses received to the consultation undertaken on designation of the Sudbury Town Neighbourhood Forum and associated officer responses, as set out in Appendix A of the report.

(1) To approve, having taken into account the material submitted in support of the application (as set out in Appendices B, C, D and E of the report) the designation of the Sudbury Town Neighbourhood Forum.

9. **SCIL request for a new Publicly Accessible Courtyard and new Community Centre in Wembley**

Councillor Tatler (Cabinet Member for Regeneration, Planning & Growth) introduced a report seeking approval for use of Strategic Community Infrastructure Levy (SCIL) funding to support the delivery of a new publicly accessible courtyard garden and new fully fitted out community centre, including a contribution towards lifetime maintenance costs, as part of the Council's Wembley Housing Zone regeneration.

In considering the report, Cabinet noted the wider regeneration as well as housing benefits identified in relation to delivery of the Wembley Housing Zone and the potential to drive further opportunities to revitalise that stretch of Wembley High Road and Town Centre including not only new housing, but also business workspace, employment opportunities, highway and public realm improvements. As part of these proposals, use of SCIL was being sought to deliver a new public courtyard garden within the development in order to increase access to open space with the added benefit of supporting community wellbeing and quality of life as well as to provide new play spaces for children and a new community centre providing valuable social infrastructure. In terms of funding, Members were advised that £5.267m was due to be generated as Brent Community Infrastructure Levy receipts from the scheme with the net CIL request for delivery of the infrastructure outlined in the report therefore being £5.96m, which would include a contribution towards lifetime maintenance costs designed to assist in unlocking growth in the area for the benefit of local residents, business and communities.

Members were also keen to recognise the positive impact being created through the use of SCIL as part of the wider programme of regeneration activity and its associated benefits for local communities across the borough, with thanks expressed for the work being undertaken to deliver the ongoing programme of growth and regeneration across the borough given the benefits identified for both current and future residents.

In support of the benefits identified and ongoing commitment to create long lasting and positive change for local communities across the borough supported by associated infrastructure, Cabinet **RESOLVED** to approve up to £11.23m Strategic Community Infrastructure Levy to deliver a new publicly accessible courtyard garden and new fully fitted out community centre, including a contribution towards lifetime maintenance costs, as part of the Council's Wembley Housing Zone regeneration.

10. **Award of 0-19 Public Health Contract (Health Visiting and School Nursing)**

Councillor Nerva (Cabinet Member for Public Health & Social Care) introduced a report seeking approval to the direct award of a contract in respect of Children's Public Health 0-19 years (Health Visiting and School Nursing) with Central London Community Health Care NHS Trust pursuant to the Provider Selection Regime.

In considering the report, members noted the outline provided in relation to the procurement options available for reprovision of the service following introduction of the new Provider Selection Regime (PSR) and wider changes introduced to commissioning arrangements across the health and social care sector as a result of the Health & Care Act 2022. In recognising the importance of the public health services provided under the contract in relation to the role of health visiting and school nursing and their value as part of an integrated offer of early intervention and prevention for families linked to expanded use of the Family Wellbeing Centres and wider links with delivery of the Health & Wellbeing Strategy, Members advised they were supportive of the approach outlined within the report involving a direct award of contract.

As a result, Cabinet **RESOLVED**:

- (1) To approve the pre-tender considerations set out in paragraph 3.5 of the report.
- (2) To approve the direct award a contract in respect of Children's Public Health Services 0-19 Years (Health Visiting and School Nursing) to the provider Central London Community Health Care NHS Trust for 2 years.

11. **Exclusion of Press and Public**


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

12. **Any other urgent business**

There were no items of urgent business.

The meeting ended at 10.50 am

COUNCILLOR MUHAMMED BUTT  
Chair

 <b>Brent</b>	<b>Cabinet Decision</b> 28 May 2024
	<b>Report from the Corporate Director, Partnerships, Housing and Resident Services</b>
	<b>Leader of the Council</b>
<b>Authority to Award a Contract for Bobby Moore Bridge Advertising</b>	
<b>Wards Affected:</b>	Wembley Park and Preston
<b>Key or Non-Key Decision:</b>	Non-Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Part Exempt - Appendix 1 is exempt as it contains the following category of exempt information as specified in Paragraph 3, Schedule 12A of the Local Government Act 1972, namely: "Information relating to the financial or business affairs of any particular person (including the authority holding that information)"
<b>List of Appendices:</b>	Appendix 1: (Exempt) Advertising Lease Bid Evaluation Appendix 2: Bobby Moore Bridge Tiles Report by Principal Heritage Officer Appendix 3: Location of Bobby Moore Bridge
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Rob Mansfield Head of Communications, Conference and Events 020 8937 4229 <a href="mailto:rob.mansfield@brent.gov.uk">rob.mansfield@brent.gov.uk</a>  Saida Ladha Filming and Advertising Officer 020 8937 1097 <a href="mailto:saida.ladha@brent.gov.uk">saida.ladha@brent.gov.uk</a>

## 1.0 Executive Summary

- 1.1 The contract for Bobby Moore Bridge advertising expires at the end of August 2024. The procurement for the new contract commenced in February 2024, with bids to be received at the end of March 2024.
- 1.2 Bobby Moore Bridge in Wembley Park has two areas available for advertising and dressing including digital screens on the two parapet walls of the bridge

and light boxes on both sides of the underpass walls of the bridge, excluding the mural with plaque dedicated to the England World Cup winning Captain Bobby Moore. Appendix 3 provides location and images of the site. It was agreed by the Chief Executive that the final award decision should be made by Cabinet. This report explains the outcome of procurement for Bobby Moore Bridge Advertising and requests a decision between the two options below:

Option A - Advertising on the parapet walls of the bridge only where the existing digital screens are located. This will not affect any of the tiled areas.

Option B - Advertising on the parapet walls of the bridge, plus the underpass walls excluding the mural with plaque.

## **2.0 Recommendation(s)**

That Cabinet:

- 2.1 Note that it is required to decide whether to award a contract for Bobby More Bridge Advertising on the basis of the following options:

Option A - Advertising on the parapet walls of the bridge only where the existing digital screens are located. This will not affect any of the tiled areas.

Option B - Advertising on the parapet walls of the bridge, plus the underpass walls excluding the mural with plaque.

- 2.2 Note that Officers recommend the award of contract on the basis of Option B as set out in Recommendation 2.1, namely advertising on the parapet walls of the bridge, plus the underpass walls excluding the mural with plaque for the reasons detailed in paragraph 3.2.6
- 2.3 Note the minimum guaranteed amount in respect of Option B will generate additional financial return above the required guarantee over the four-year contract period compared with Option A.
- 2.4 Note in respect of Option B the tiled mural with plaque in honour of Bobby Moore will remain on permanent display inside the underpass and will be framed by the lightboxes.
- 2.5 Approve the award of a contract for Bobby More Bridge Advertising on the basis of Option B to Quintain Ltd.

## **3.0 Detail**

### **3.1. Leader Foreword**

- 3.1.1 The Bobby Moore Bridge, at the bottom of the main steps to Wembley Park Station, is one of the most important arrival points to Wembley Park for the millions of visitors who attend the iconic venues in the area as well as for thousands of local residents and students living in the area. This valuable

council asset has helped support the priorities in the Borough Plan by successfully generating much needed commercial income over several years and this should continue, especially given the increasing pressure on the council's budget.

3.1.2 This site is a major gateway to Wembley Park creating a sense of arrival while providing a safe and secure welcome to the area , which is in keeping with the aims in the Borough Plan. Walking through a well-lit space during the evenings and after dark provides confidence and a feeling of safety for the community and many visitors to the many venues and amenities of Wembley Park. The social value benefits provided by the supplier include an environmentally friendly approach to their operations and opportunities for the local community to meet and build their skills. This is fully funded by the supplier and helps the council's aim to create a thriving community. The supplier also demonstrates a commitment to equality and diversity by building an inclusive workforce.

## **3.2 Background**

3.2.1 The council requires the provision of full management of Bobby Moore Bridge advertising. It has been determined that the most appropriate means of providing the full management of Bobby Moore Bridge advertising is through the procurement of a contractor by way of a tender process. Officers obtained authority to tender by submitting a Recordable Decision Report for Bobby Moore Bridge Advertising Authority to Tender Report that was agreed on 4 January 2024.

3.2.2 Officers have considered whether the council can provide the full management of Bobby Moore Bridge advertising itself but have concluded that a contractor best provides full management of Bobby Moore Bridge advertising.

3.2.3 The underpass and retaining walls at Bobby Moore Bridge are decorated with ceramic tile murals. Appendix 2 contains a report from the Principal Heritage Officer regarding the tiles. Wembley History Society have a keen interest in the tiled area inside and outside the bridge and were advised by the Chief Executive that a decision to award a contract for advertising on one of two options would be made by members at Cabinet. The two options are:

- Option A - Advertising on the parapet walls of the bridge only where the existing digital screens are located. This will not affect any of the tiled areas.
- Option B - Advertising on the parapet walls of the bridge, plus the underpass walls excluding the mural with plaque.

3.2.4 Officers sought bids for a contract over a four-year term with no extension period on the basis of both Option A and Option B. Officers sought a minimum guaranteed income from the contractor to the council of £360,000 plus revenue share for Option A and £400,000 plus revenue share for Option B for the full contract duration. It was indicated that an annual CPI inflationary increase would be applied in years two, three and four of the contract period.

- 3.2.5 Tenders were invited on 15 February 2024 using the council's Electronic Tendering Facility. Contractors were provided with an outline specification and details of the quotation approach. 18 organisations initially expressed an interest. The results of the tender bid are listed in Appendix 1 (containing exempt information).
- 3.2.6 On receipt of bids for Option A and B, Officers considered the merits of the bids. Bids for both Options A and B exceeded the minimum guaranteed sums detailed in the tender documents. Whilst it is clear that it is for Cabinet to award the contract for advertising on either Option A or B, officers recommend award on the basis of Option B. This is due in part to the fact that Option B provides greater financial benefits for the council over Option A through the generation of additional external income. Further, Bobby Moore Bridge underpass is one of the main gateways to Wembley Stadium, and officers consider the light boxes inside the underpass as proposed in Option B create a welcoming, well-lit safe space both day and night for residents and visitors. Lighting provided by the light boxes on either side of the mural make viewing of the mural area, especially after dark, more accessible compared to only minimal overhead lights.
- 3.2.7 With Option B not all the underpass tiles will be visible, however the mural with plaque will be on permanent display as has been the practice recently under the current contract. The Heritage Officer Report (Appendix 2) mentions the plaque is of significance due to the association with Bobby Moore.

#### **4.0 Stakeholder and ward member consultation and engagement**

- 4.1 The Chief Executive agreed that Cabinet should make the decision as to whether to proceed with Option A or Option B, with further information from the Heritage Officer regarding the tiles in the underpass to be included in the award report to inform the decision at Appendix 2.
- 4.2 The ward members for Wembley Park and Preston were advised of the tender and consulted regarding the tender process. They were advised the decision would be made by Cabinet.
- 4.3 The Head of Healthy Streets and Parking and the Head of Highways Management were also consulted about the continuing use of Bobby Moore Bridge for advertising, the following comments were noted:
- 4.3.1 Any advertising displays or changes should get approval in advance and should not interfere with the structure of the bridge. The tiled areas should be protected if they are to be covered with light boxes or advertising and returned to their original condition with no damage at the end of the contract period. The council should request the use of the bridge digital display screens for safety messages or crowd control during an emergency situation. This can be used if the correct sized artwork is available, new artwork will be created by the council's Design Team in conjunction with Highways for public safety messages in the case of an emergency situation.



- 4.3.2 There are planned works for the railings to be made higher above the digital panel that will not affect the display.
- 4.4 Wembley History Society had discussions with the council over the last few years regarding the display of the tiled area and were informed about the two options for tender.
- 4.5 A member of the public initiated a petition lobbying the Cabinet to 'allow the heritage tile murals in the Bobby Moore Bridge subway at Wembley Park to be put back on permanent public display, by only granting a new advertising lease for the parapets of the bridge'. This petition went live on 6 March 2024 at [Petitions \(brent.gov.uk\)](https://www.brent.gov.uk/petitions) and closed on 10 May 2024 with 114 signatures in support of this petition.
- 4.6 Transport for London confirmed through their Area Manager for Wembley Park Station they have no planned works that affect Bobby Moore Bridge during the contract period.

## **5.0 Financial Considerations**

- 5.1 The financial proposals sought as part of the invitation to tender was as follows:

Option A - Minimum guaranteed income to be achieved over the whole contract period of four years at a minimum of £90,000 per annum plus revenue share. Revenue share means 50% of the amount by which the net revenue exceeds £135,000 per annum.

Option B - Minimum guaranteed income to be achieved over the whole contract period of four years at a minimum of £100,000 per annum plus revenue share. Revenue share means 50% of the amount by which the net revenue exceeds £150,000 per annum.

- 5.2 Option B income is currently in the existing budget.
- 5.3 Both options will cover maintenance of the underpass walls as the existing contractor manages this area and there is no council budget available to manage this area in the future. The management of the overall structure of the bridge will continue to be the responsibility of the council.
- 5.4 An annual CPI inflationary increase will be applied to the minimum guaranteed payment in year two, three and four for the option selected.
- 5.5 This is income to the London Borough of Brent for using council assets that include Bobby Moore Bridge for advertising and dressing.
- 5.6 As detailed in paragraph 3.2.6 and Appendix 1, bids for both Options A and B exceeded the minimum guaranteed sums detailed in the tender documents.

## **6.0 Legal Considerations**

- 6.1 The value of this agreement over its lifetime falls below the threshold for concessions under the Concession Contracts Regulations 2016 (the “Concession Regulations”) and the procurement is not therefore subject to full application of the Concession Regulations.
- 6.2 The award is subject to the Council’s own Standing Orders and Financial Regulations in respect of Medium Value Contracts given the procurement is valued at more than £214,904. Whilst Medium Value Contracts would not ordinarily require Cabinet approval for the award, as detailed in paragraph 4.1, the Chief Executive agreed that Cabinet should make the decision as to whether to award contracts on the basis of either Option A or Option B.
- 6.3 It will be noted in the Heritage Officer’s report regarding the tiles in the underpass at Appendix 2, the tiles in the underpass are considered a non-designated heritage asset within the meaning in the National Planning Policy Framework but they have no legal protection. As a result, Cabinet are not precluded from awarding on the basis of Option B as detailed in Recommendation 2.5.
- 6.4 As the procurement is not subject to the full application of the Concession Regulations, the council is not required to observe the requirements of a mandatory minimum standstill period imposed by the Concession Regulations before the agreement can be entered into. However, the decision to award is subject to the council’s usual call-in period.

## **7.0 Equity, Diversity & Inclusion (EDI) Considerations**

- 7.1 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.
- 7.2 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.
- 7.3 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.

- 7.4 The proposals in this report have been subject to screening and Officers believe that there are no adverse equality implications. Indeed, the supplier will provide space for council messages and supports equal opportunities and services for the community.

## **8.0 Climate Change and Environmental Considerations**

- 8.1 The digital screens will use LED lighting and intelligent lighting control to save energy.
- 8.2 The light boxes will use individually controlled multi-LED pixels with intelligent lighting control to save energy.

## **9.0 Human Resources/Property Considerations**

- 9.1 This service is currently provided by an external contractor and there are no implications for Council staff arising from retendering the contract.
- 9.2 The main bridge structure will continue to be maintained by the council.
- 9.3 The Lightboxes and any other fixings to the bridge will not prevent access to repairs or emergency and planned works.

## **10.0 Communication Considerations**

- 10.1 The digital screens will be used by the council for 21 days per annum for campaigns and messages in line with the council's corporate communication priorities. The digital screens may also be used in the case of an emergency message.

**Report sign off:**

***Peter Gadsdon***

Corporate Director, Partnerships, Housing & Resident Services

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

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## **Appendix 2**

### **Bobby Moore Bridge Tiles Report by Principal Heritage Officer**

#### **History**

The pedestrianisation project was conceived in 1988 and was an early example of public/private sector working. Brent Council, Wembley Stadium Ltd and the Department of Transport worked together on the scheme to pedestrianise Olympic Way. As part of the plans to improve pedestrian access to the stadium from Wembley Park underground station, a wide pedestrian underpass was constructed underneath Bridge Road between 1991 and 1993.

The road bridge was named 'Bobby Moore Bridge', in honour of one of football's legends. It was opened on 8 September 1993 by Stephanie, his widow. Roger Freeman, MP, Minister for Public Transport cut the ribbon at the ceremony. The goalkeeper, Gordon Banks, who held Moore above his shoulders at Wembley was among the guests. Banks paid tribute to Bobby at the opening of the £6m structure. The idea of naming it after Moore was the invention of Councillor Chuni Chavda.

The underpass, and the retaining walls of Olympic Way to the north and south of the subway, were decorated with ceramic tile murals. They featured scenes from famous sporting events held at Wembley as well as entertainment stars to have appeared at the Wembley Stadium and Arena. The murals were made by the Architectural Art Service of the Langley London firm, and the artist was Kathryn Digby.

The project was half funded by Wembley Stadium Limited, in conjunction with the Football Trust, and half by public funds from the Department of Transport and Brent Council. John Mowlem Construction were the major contractors.

Some of the murals were destroyed due to works by Transport for London in 2016. This includes the north splay under Bridge Road which featured Bobby Moore holding up the cup surrounded by his team-mates. Also, part of the mural scene celebrating pop music concerts at Wembley Stadium (left side) on the south splay.

#### **Significance**

Such murals made of coloured ceramic tiles were a feature of post-war architectural design to enliven such subways. Origins are firmly from the London Underground which used tiles on the walls for hygiene purposes and to help form a corporate and orderly image of the transport system. They are seen elsewhere in Brent, including the Neasden underpass, where murals focus on the River Brent and on the bridge over the railway at Harlesden LUL station.

The colourful tiled murals at Wembley Park depict various scenes of sports and entertainment events centred around Wembley and the stadium. The opening plaque and the association with Bobby Moore is special.

The tiles have historic and artistic merit and are considered a non-designated heritage asset within the meaning in the National Planning Policy Framework. They were submitted for statutory listing in May 2023 and did not meet the initial requirements that fall into any of the three categories used by the Department for Digital, Culture, Media and Sport to prioritise designation resources on those sites that are most in need of protection. Therefore, they have no legal protection.

11 April 2024

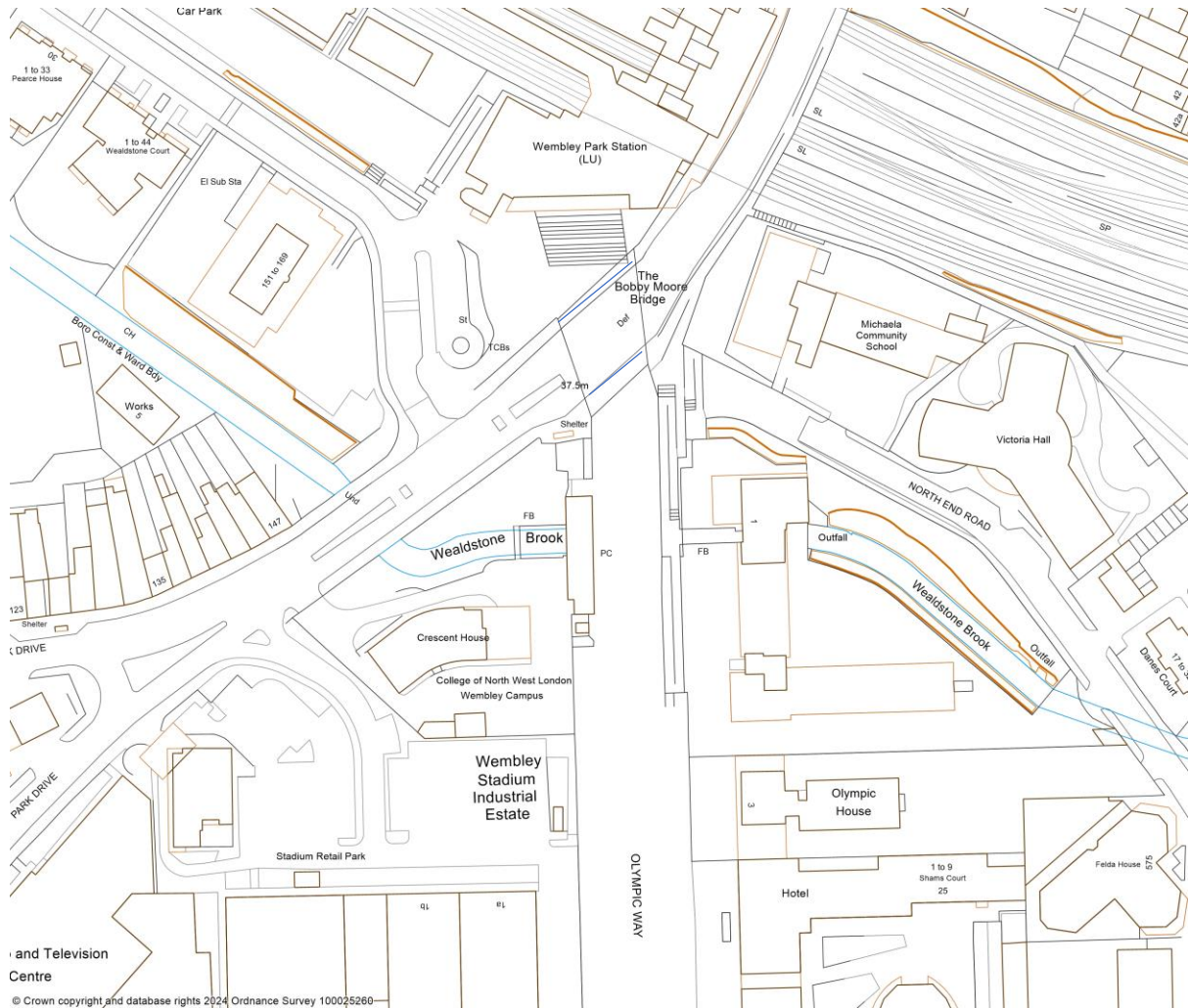
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# Appendix 3. Location of Bobby Moore Bridge, Digital Screen Specification, Tiles and Light Boxes

## Bobby Moore Bridge, Olympic Way, Wembley HA9 0NP

Location of two digital advertising panels on The Bobby Moore Bridge marked as blue lines.



14 February 2024 1:1000



The site occupies a prominent location at the opposite end of Olympic Way adjacent to Wembley Park Station and facing Wembley Stadium. The site is not located within a conservation area and there are no listed buildings in the vicinity however the tiles in the underpass walls and splay walls are considered a non-designated heritage asset within the meaning in the National Planning Policy Framework

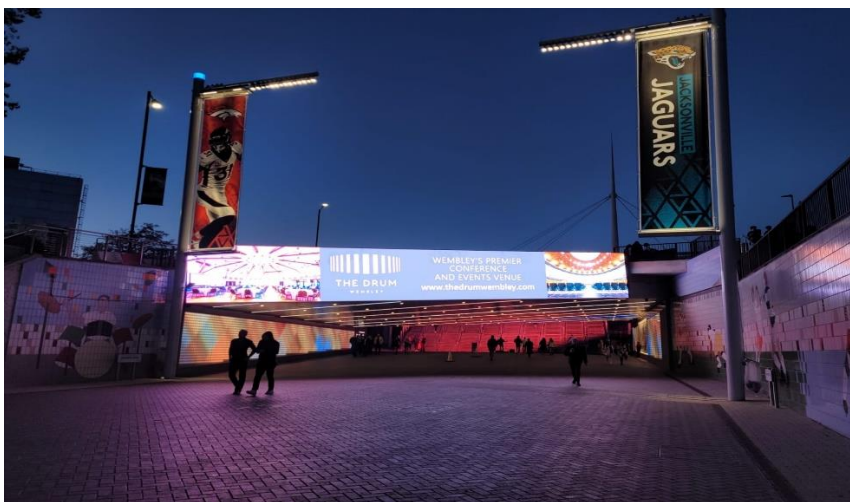
## Rectangular Digital Advertising Screen 1

Screen 1 is located on the parapet (outside top) of the bridge on the side facing Wembley Park Station northern parapet. Screen Size: 26,313 x 2607mm 3,888 x 384 & 2,736 x 384 pixels



## Rectangular Digital Advertising Screen 2

Screen 2 is located on the parapet (outside top) of the bridge on the side facing Wembley Stadium/Olympic Way southern parapet. Screen Size: 20,912 x 2443mm 3,888 x 384 & 2,736 x 384 pixels



Screens 1 and 2 Approved under planning consent 19/1474

\* To avoid the potential adverse impacts of light spill, light pollution and glare, the luminance levels associated with the illuminated images and advertising would be within the industry levels set out in the following lighting guideline documents:

Institution of Lighting Professionals, GN01:2011 Guidance Notes for the Reduction of Obtrusive Light

Institution of Lighting Professionals, PLG05:2015 The Brightness of Illuminated Advertisements

\* Each sign would have the ability to dim up and down automatically throughout the day to consider ambient daylight conditions. The dimming patterns of each screen and respective percentages of emitting light intensity may differ as the location, orientation, structure and capacity of each digital screen may vary however the luminance levels work to the following parameters:

Maximum dusk/nighttime screen luminance–300cd/m<sup>2</sup> Maximum daytime screen luminance–5000cd/m<sup>2</sup>

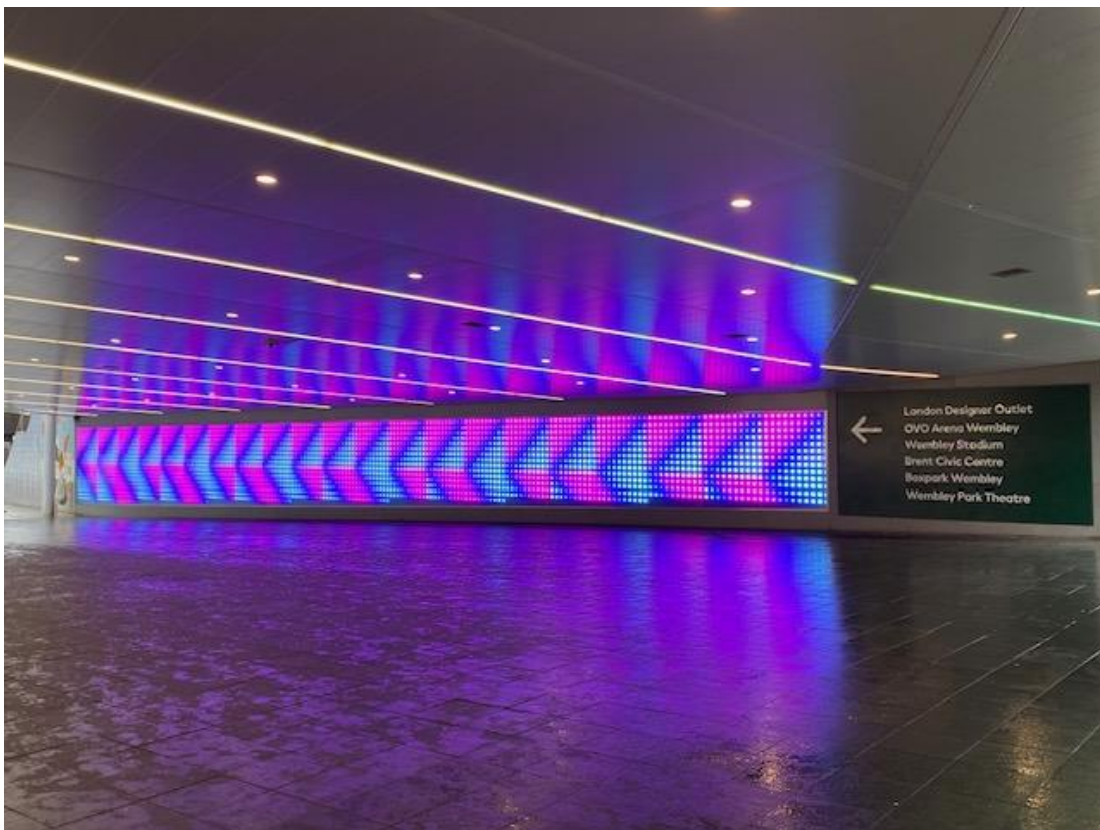


## Underpass Tiles and Light Boxes Location

Lightboxes in underpass on eastern wall with plaque including tiled mural.



Lightboxes in underpass on western wall




Tiles in underpass on eastern wall prior to installation of light boxes on either side of the plaque mural



Tiles in underpass on western wall prior to installation of light boxes



 <p><b>Brent</b></p>	<p><b>Cabinet</b> 28 May 2024</p>
	<p><b>Report from the Corporate Director, Partnerships, Housing and Residents Services</b></p>
	<p><b>Lead Member – Cabinet Member for Resident Services &amp; Culture (Councillor Fleur Donnelly- Jackson)</b></p>
<p><b>Household Support Fund extension (from 1 April 2024 until 30 September 2024)</b></p>	
<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>List of Appendices:</b>	<p>Three</p> <p>Appendix 1: Launch letter for the Household Support Fund extension including allocations and grant determination criteria.</p> <p>Appendix 2: Household Support Fund Grant determination letter</p> <p>Appendix 3: Household Support Fund guidance</p>
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	<p>Thomas Cattermole, Director of Resident Services 020 8937 5446 <a href="mailto:Thomas.Cattermole@brent.gov.uk">Thomas.Cattermole@brent.gov.uk</a></p> <p>Asha Vyas, Head of Customer Services and Assessments 020 8937 2705 <a href="mailto:Asha.Vyas@brent.gov.uk">Asha.Vyas@brent.gov.uk</a></p>

## 1.0 Executive Summary

- 1.1. This report seeks approval for the allocation and the distribution of the Household Support Fund extension funding, which runs from 1 April 2024 to 30 September 2024.

## 2.0 Recommendation(s)

That Cabinet:

- 2.1 Notes that Brent's allocation for the Household Support Fund (HSF) for the period 1 April 2024 to 30 September 2024 is £2,781,222.28.
- 2.2 Approves the proposed approach for allocating and distributing the HSF as set out in paragraphs 3.10 to 4.14 of this report.
- 2.3 Approves the proposed approach whereby the Corporate Director, Partnerships, Housing and Residents Services in consultation with the Lead Member for Customers, Communities & Culture will exercise authority to establish and modify detailed eligibility criteria regarding the Household Support Fund grant scheme as may be necessary to enable appropriate allocation of funding in accordance with Recommendation 2.2 above.
- 2.4 Approves the proposed approach whereby the Corporate Director, Partnerships, Housing and Residents Services in consultation with the Lead Member for Customers, Communities & Culture has the authority to amend the Council's eligibility criteria during the lifetime of this Household Support Fund extension period if necessary for the reasons detailed in paragraph 3.6, subject to the parameters set by the Department for Work and Pensions in its Determination and Guidance.

### **3.0 Background**

#### **3.1 Cabinet Member Foreword**

- 3.1.1 In the Spring Budget the Government announced it is providing an additional £500 million to enable the extension of the Household Support Fund. This means that Local Authorities in England have received £421 million to support those in need locally through the Household Support Fund. The funding is available to Local Authorities in England from 1 April 2024 and will run until 30 September 2024.
- 3.1.2 In Brent, the Household Support Fund will continue to help our most vulnerable households. The funding provided to the local authority will cover the period of 1 April 2024 to 30 September 2024. Brent's allocation for the Household Support Fund (HSF) for this period is £2,781,222.28.
- 3.1.3 Councils need to make part of the funding available to residents on an application basis. In Brent this will continue to be available through our vital Resident Support Fund. In addition to this, funding will be available in the form of vouchers for children in receipt of Free School Meals, an allocation of funding to support the work of the Credit Union, and finally supporting community projects with additional funding (details to be found in paragraph 4).

#### **3.2 Detail**

- 3.2.1 On 26 March 2024, the DWP confirmed that a further allocation of Household Support Fund (HSF) for £2,781,222.28. This grant will run from the 1 April 2024 – 30 September 2024. The Council cannot carry over the HSF grant fund provided by the DWP beyond 30 September 2024.
- 3.2.2 The HSF is being extended from 1 April 2024 to 30 September 2024, with £421 million available to Local Authorities in England for that period.
- 3.2.3 The aim is to support those most in need to help with rising living costs by providing extra funds to alleviate food poverty and to support them with their energy, water bills and other essentials.
- 3.2.4 There is no limit or proportionality of which groups the Fund should support. The guidance emphasises on supporting households with food, energy bills and wider support.
- 3.2.5 Local Authorities have been given flexibility to identify those at need and have been asked to use the data and information at their disposal in order to do this. There must be a clear rationale or documented policy/framework outlining our approach including how we are defining eligibility and how households access the scheme. Furthermore, Authorities have access to DWP's Searchlight portal and can use information relating to Universal Credit claims to aid the identification of households at need. The eligibility criteria are outlined in Section 4 of this report as part of the proposed approach for Brent.
- 3.2.6 Local Authorities are also encouraged to work with partners such as voluntary organisations to ensure that the needs of vulnerable families are being met.
- 3.2.7 The funds must be used or committed to by 30 September 2024. The DWP has advised that the scheme can be delivered through a variety of routes such as providing vouchers, bank transfers, making direct provision of food or issuing grants to third parties.
- 3.2.8 In accordance the DWP provide guidance 202425, the scheme should be used to primarily fund food provision and direct assistance with energy bills. The Council has discretion to assess what is reasonable to assist those in genuine need. Examples of other eligible spends include:

Essentials linked to energy and water (including sanitary products, warm clothing, soap, blankets, boiler service/repair, purchase of equipment including fridges, freezers, ovens, etc.), in recognition that a range of costs may arise which directly affect a household's ability to afford or access food, energy and water.

- Wider essentials (including, but not limited to, support with other bills including broadband or phone bills and clothing).
- Housing costs where existing housing discretionary schemes do not meet this exceptional need. Importantly, the fund should not be used to provide housing support on an ongoing basis or to support unsustainable

tenancies. The Fund cannot be used to provide mortgage support, though homeowners could still qualify for the other elements of the Fund.

3.2.9 There is no requirement for the Council to undertake a means test or conduct benefit checks unless this specifically forms part of the Authority's local eligibility criteria.

3.2.10 Authorities can also provide support to an individual regardless of their immigration status, if there is a genuine care need that does not arise solely from destitution e.g., health problems.

3.2.11 £421m has been made available to County Councils and Unitary Authorities in England to support those most in need with the cost of essentials via the Household Support Fund. This funding covers the period 1 April 2024 to 30 September 2024 inclusive. There is no indication currently from the Department for Work and Pensions (DWP) if the funding for local authorities will continue beyond September 2024. The Brent Resident Support Fund, in its current form, will continue until March 31, 2025, however without the DWP HSF funding element.

#### **4.0 Proposed approach for Brent.**

4.1 Since October 2021, the HSF grant has supported 35,837 households in Brent with £13.7m of support funding.

4.2 The majority of the spend consisted of proactive support given to households with children on FSM during holidays, disabled households, Housing Benefits only households. Reactive support was provided through the application process via the Council's own Resident Support Fund.

4.3 It is proposed that 6500 Disabled households will be allocated £25 to support with household costs, such as food and fuel. This will be paid directly to them through vouchers, as previously. The total allocation for this cohort is £162,500.

4.4 It is proposed that the Council provides support to families who receive free school meals during half term and six weeks summer holiday. It is proposed £15 per child per week for a total of seven weeks. The total cost for 10,476 children would be £1,100,000.

4.5 It is proposed the HSF fund will also be utilised to support the Council's 440 care leavers with £50.00 vouchers to support them with additional costs in household bills which would be £22,000.

The Council will use the same mechanisms used for the previous allocation of the HSF to distribute the funds:

- The Edenred platform for children in receipt of benefits related free school meals and other vulnerable families identified by the schools.
- Vouchers to Care leavers and Disabled households.



## **Resident Support Fund proposal**

- 4.6 It is proposed that £1,206,722.28 of the grant will be allocated to the Council's Resident Support Fund for residents to proactively apply for support with food, energy and water, or wider essentials e.g., white goods. Existing mechanisms and eligibility criteria will be utilised to distribute the funds.
- 4.7 The RSF applications will be made by customers directly or through support from Brent Community Hubs, Family Well-Being Centres and any third-party organisations. Criteria has been amended with Cabinet on 5 February 2024. The maximum award is now £500 with one application per rolling 12 months.

## **Credit Union Support proposal**

- 4.8 £200,000 of the grant will be allocated to the Credit Union to support households with multiple debts with interest free loans provided they meet the affordability criteria.
- 4.9 Since August 2020 to 31 March 2024, 306 households have been supported with £1,104,700 financial support with interest free loan. Of this £390,535 has been repaid in instalments by households. Only two households have defaulted payments.

## **Supporting Community Projects**

- 4.10 It is proposed £40,000 be allocated to support the Community Well-being Project-Sufra to support residents with a holistic approach with health, wellbeing, maximisation of welfare support and support with budgeting and debt.
- 4.11 It is proposed £50,000 be allocated to support Advice For Renters to support residents with rent arrears, sustainment of tenancies and debt.
- 4.12 Table 1 provides a breakdown of the proposed spend for each of the proposals outlined in paragraphs 4.1 to 4.11.

**Table 1**

<b>Description of Spend</b>	<b>Grant allocation £</b>
<b>Families with Children -10,476 children</b>	£ 1,100,000
<b>Care Leavers- 440 care leavers</b>	£22,000

<b>Disabled households – one off payment to pensioner housing benefit households-6500 households</b>	£162,500
<b>Credit Union</b>	£200,000
<b>All households – top up the Resident Support Fund and provide ongoing reactive support through the application process</b>	£1,206,722.28
<b>Community Projects-Sufra and Advice for Renters</b>	£90,000.00
<b>Total</b>	<b>£2,781,222.28</b>

4.13 This report refocuses our approach towards addressing key community needs through strategic funding and partnerships, ensuring impactful and sustainable support for our residents.

4.14 In addition, we are proposing that the Household Support Fund is utilised to support residents with reactive support due to high demand. Any allocation not spent in the table, is reallocated to elements of the Resident Support Fund (RSF) under DWP’s guidance for supporting residents with the cost of living.

## **5.0 Stakeholder and ward member consultation and engagement**

5.1 It is not considered in the circumstances and timescale that non-statutory public consultation is a viable or reasonable option for the Council in taking the decisions which are the subject of this report, on account of the very short period which the government has given local authorities regarding the extension of the Household Support Fund grant scheme even if at other times it would have considered consultation with the public and / or stakeholders affected by the decision.

## **6.0 Financial Considerations**

6.1 The Council’s indicative allocation from the fund is £2,781,222.28, which has to be used between 1 April and 30 September 2024. The aim of this funding is to give vulnerable households peace of mind this spring and summer by providing extra funds to alleviate food poverty and to support them with their energy, water bills and other essentials.

6.2 The planned spend shown in Table 1 at paragraph 5 above is within the grant allocation, so there is no risk to the Council. It is a requirement of the grant conditions to submit regular claims of any costs incurred which will be reimbursed provided they are within the permitted spend in the guidance. Any

unspent funds from this allocation will not be claimed, so there will no requirement to refund any monies to the DWP.

## **7.0 Legal Considerations**

- 7.1 The funding provided under the HSF is required to be distributed by 30 September 2024 to support those most in need with the cost of food, energy, water bills and other essentials. The HSF funding must only be used to provide support as defined within the grant conditions as set out by the Department for Work and Pensions. Officers have set out a proposed approach in section 4 of the report and will seek authority from the Corporate Director, Partnerships, Housing and Residents Services in consultation with the Lead Member for Customers, Communities & Culture establish such detailed criteria as may be necessary to enable appropriate allocation of funding.
- 7.2 The new allocation of HSF funding runs from the 1 April 2024 to 30 September 2024 and funds must be used or committed by 30 September 2024. Given the value of the HSF allocation to Brent (in the sum of £2,781,222.28) for 2024, decisions by the Corporate Director, Partnerships, Housing and Residents Services regarding its distribution and the establishment of eligibility criteria for its distribution will be classed as a key decision.
- 7.3 Officers will need to have regard to the Subsidy Control regime in relation to any arrangements entered into for the distribution of the HSF.

## **8.0 Equity, Diversity & Inclusion (EDI) Considerations**

- 8.1 The public sector equality duty, as set out in section 149 of the Equality Act 2010, requires the Council, when exercising its functions, to have “due regard” to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a “protected characteristic” and those who do not share that protected characteristic. The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 8.2 Having due regard involves the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.
- 8.3 There is a requirement to consider how the Household Support Fund impacts those with characteristics protected under the Equality Act 2010. 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.
- 8.4 Due to the urgency of the situation, formal assessments have not been

undertaken in respect of the decisions which are the subject of this report. Such formal assessments are not a requirement of the duty. An underlying purpose of the recommended decisions is to have regard to the protection of those with protected characteristics e.g., children eligible for free school meals and families with pre-school children eligible for benefits. The proposed approach for allocating and distributing the funding recommended for adoption, however, seeks to provide funding to a wide range of vulnerable households. In the circumstances, Officers do not consider that there are any adverse equalities impacts but Officers will keep the equalities impact of the decisions under review.

## **9.0 Climate Change and Environmental Considerations**

9.1 No impact on the Council's environmental objectives and climate emergency strategy.

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

10.1 It is not considered at this time that there are any Human Resources Implications arising from decisions which are the subject of this report.

## **11.0 Communication Considerations**

11.1 It is proposed that the website and communication with internal and external stakeholders will be developed to the refreshed allocation of HSF funds.

**Report sign off:**

**Peter Gadsdon**

*Corporate Director, Partnerships, Housing and Resident Services*



Department  
for Work &  
Pensions

My address: Rebecca Bryning, Head of the  
LA Grants Team, Local  
Authority Partnership,  
Engagement and Delivery (LA-  
PED) division

Date: 26 March 2024

By email

Chief Executive Officers  
Chief Finance Officers  
LA Single Points of Contact

Dear colleagues

## **Household Support Fund Extension (from 1 April 2024 until 30 September 2024)**

On 6 March 2024 in the Spring Budget the Chancellor announced that the Household Support Fund (HSF) would be extended for a further six months, from 1 April 2024 to 30 September 2024, with a further £421m of funding. As has been done for previous schemes, the fund will be made available to County Councils and Unitary Authorities in England to support those most in need.

As part of the support package, the Devolved Administrations have also been allocated funding in parallel as a result of the Barnett Formula to spend at their discretion.

Included in the guidance for this extension are a number of changes from previous versions, so it is strongly recommended that even those familiar with previous iterations of the HSF familiarise themselves with this new guidance. We bring to your attention some key differences:

- Funding for evaluation activities, including data collection (for example, quantitative surveying and/or qualitative interviewing with recipients of the fund) and analysis and report writing, will now be considered eligible spend as an administrative cost.
- It is mandatory that in any publicity material for the scheme, including via online channels and media releases, Authorities make clear that this funding is being provided by the UK Government. This requirement extends to other public bodies (for example, District Councils) delivering the scheme on behalf of the Authority.
- Delivery plans must be signed off by your Section 151 Officer and include the information of the Section 151 Officer and responsible Cabinet Member before submission to DWP.

The fund can be used to provide support with food, energy and water, essentials linked to energy and water, and wider essentials. Authorities can also use funding to support households with housing costs where existing housing support does not meet this need, and to supplement support with signposting and advice.

As with previous iterations of the HSF, Authorities are unable to carry forward any underspends from previous schemes. This is because this is a new grant with different conditions.

This HSF scheme will be distributed as usual by County Councils and Unitary Authorities in England. Shire Councils must work closely with District Councils and other local partners to identify a broad range of vulnerable households across their local area. The scheme runs from 1 April 2024 to 30 September 2024 and Authorities should aim to have arrangements in place as quickly as possible to support vulnerable households throughout the grant period.

Authorities will be required to provide two management information (MI) returns outlining their grant spend and the volume of awards:

- an interim MI return for the period 1 April 2024 to 30 June 2024 will be due by 19 July 2024
- a FINAL MI return and delivery record for the period 1 April 2024 to 30 September 2024 will be due by 25 October 2024.

Grant payments will be made to Authorities in arrears on receipt of a fully completed, compliant and verified MI return.

The funding for this grant has been allocated to Authorities using the population of each Authority weighted by a function of the English Index of Multiple Deprivation. Authority allocations are shown in **Annex B**.

Authorities are asked to provide the Department for Work and Pensions (DWP) with a summary of how you are planning to spend the additional funding during the period 1 April 2024 to 30 September 2024.

The delivery plan template has been issued with this letter asking authorities to outline their spending plans. Please complete and return to [lawelfare.pdt@dwp.gov.uk](mailto:lawelfare.pdt@dwp.gov.uk). **Do not amend the delivery plan template format or add lines as this causes issues with its uploading.** Any questionnaire that has had its format changed will need to be returned to the Authority to recomplete.

Authorities are required to complete an Interim and Final MI reporting template. The MI template has been updated and any changes are covered in the new guidance document. Additionally, MI must be returned on the MI template provided and copied to your Section 151 Officer/CFO. **No local versions or PDF copies are acceptable, and any received will be returned to the Authority.**

DWP will continue to share the Universal Credit, Pension Credit and Employment and Support Allowance (Income Related) customer data to Authorities on a monthly basis. DWP will also continue to provide additional data for customers who are in receipt of Housing Benefit only and are not in receipt of a means tested benefit. Authorities may find this useful in targeting support to vulnerable households.

Authorities must ensure that they have signed the Memorandum of Understanding (April 2023) and sign the revised version when it is issued later this year in order to receive the data.

Following the success of the Knowledge-Share events and 'Drop In' sessions we held over the last 12 months, we have decided to hold further sessions throughout this scheme where you are encouraged to attend to raise any questions you may have or to share good practice. Full details of these will be made available in due course.

## Urgent next steps for Authorities

The grant period runs from 1 April 2024 and Authorities are asked to start making immediate preparations to administer the Fund and deliver the support to vulnerable households as soon as possible. Following feedback from Authorities and due to the length of the scheme and the number of Bank Holidays in the planning period the deadline for the return of the Delivery plan has been extended.

**Please complete and return your planning questionnaire to [lawelfare.pdt@dwp.gov.uk](mailto:lawelfare.pdt@dwp.gov.uk) by 10 May 2024.**

You or your nominated single point of contact should dial into a County Councils and Unitary Authorities all-LA MS Teams call on 18 April 2024 at 11:00-12:00. The purpose of this call is to discuss the grant arrangements and give Authority representatives the opportunity to ask any questions or raise any points of clarification. Dial-in details are attached in **Annex A**.

If you have any additional questions, contact [LA-PED.lagrantsprojectteam@dwp.gov.uk](mailto:LA-PED.lagrantsprojectteam@dwp.gov.uk)

Yours faithfully



Rebecca Bryning

Head of the LA Grants Team, LA-PED

## County Councils and Unitary Authorities all LA MS Teams call on 18 April 2024

<b>Title</b>	County Councils and Unitary Authority Household Support Fund 5 information event
<b>Speaker(s)</b>	Rebecca Bryning, Will Walker-Lane, Lorraine Pearson
<b>Event call time</b>	18 April 2024 at 11:00am – 12:00pm (60 minutes) (Dublin, Edinburgh, Lisbon, London)

### Link and dial in details

## Microsoft Teams meeting

Join on your computer, mobile app, or room device

[Click here to join the meeting](#)

Meeting ID: 331 903 436 192

Passcode: rLBtVS

[Download Teams](#) | [Join on the web](#)

[Learn More](#) | [Meeting options](#) | [Legal](#)



## Household Support Fund 1 April 2024 to 30 September 2024 allocations.

County Councils and Unitary Authorities	DWP allocation of £421 million
Barking and Dagenham	£2,162,051.52
Barnet	£2,455,182.90
Barnsley	£2,351,263.96
Bath and North East Somerset	£966,860.28
Bedford	£1,201,485.00
Bexley	£1,542,309.65
Birmingham	£12,791,135.04
Blackburn with Darwen	£1,618,526.59
Blackpool	£1,745,857.53
Bolton	£2,780,316.57
Bournemouth, Christchurch and Poole Council	£2,653,367.04
Bracknell Forest	£555,468.03
Bradford	£5,694,487.83
Brent	£2,781,222.28
Brighton and Hove	£2,140,360.89
Bristol, City of	£4,039,965.11
Bromley	£1,867,882.58
Buckinghamshire	£2,399,190.54
Bury	£1,534,200.05
Calderdale	£1,833,003.46
Cambridgeshire	£3,581,424.56
Camden	£2,006,931.89
Central Bedfordshire	£1,483,073.82
Cheshire East	£2,203,892.10
Cheshire West and Chester	£2,290,047.45
City of London	£63,080.28
Cornwall	£4,528,569.87
Coventry	£3,224,222.30
Croydon	£3,013,689.49
Cumberland	£2,167,439.16
Darlington	£913,853.75
Derby	£2,224,711.41
Derbyshire	£5,404,080.90
Devon	£5,064,876.12
Doncaster	£2,989,273.08
Dorset	£2,294,941.45
Dudley	£2,625,519.07
Durham	£4,676,099.65
Ealing	£2,658,804.97
East Riding of Yorkshire	£2,061,832.61
East Sussex	£3,896,783.88
Enfield	£2,847,994.64

Essex	£9,436,542.83
Gateshead	£1,836,629.95
Gloucestershire	£3,692,483.14
Greenwich	£2,378,692.91
Hackney	£2,822,258.58
Halton	£1,297,880.42
Hammersmith and Fulham	£1,414,374.97
Hampshire	£7,124,127.25
Haringey	£2,406,671.72
Harrow	£1,476,707.18
Hartlepool	£993,021.25
Havering	£1,648,150.98
Herefordshire	£1,329,601.78
Hertfordshire	£6,172,064.84
Hillingdon	£2,069,342.07
Hounslow	£2,042,396.17
Isle of Wight	£1,131,576.08
Isles of Scilly	£11,130.10
Islington	£2,218,159.62
Kensington and Chelsea	£1,180,369.12
Kent	£11,065,380.80
Kingston upon Hull, City of	£3,038,293.68
Kingston upon Thames	£862,867.15
Kirklees	£3,702,823.27
Knowsley	£1,862,188.67
Lambeth	£2,720,637.01
Lancashire	£9,678,235.22
Leeds	£7,098,648.16
Leicester	£3,429,353.16
Leicestershire	£3,620,038.89
Lewisham	£2,668,537.62
Lincolnshire	£5,464,685.20
Liverpool	£6,054,020.20
Luton	£1,829,274.04
Manchester	£6,453,163.20
Medway	£2,262,463.11
Merton	£1,186,607.26
Middlesbrough	£1,653,614.95
Milton Keynes	£1,792,516.52
Newcastle upon Tyne	£2,898,403.85
Newham	£3,339,194.75
Norfolk	£6,696,806.23
North East Lincolnshire	£1,559,664.65
North Lincolnshire	£1,323,892.77
North Northamptonshire	£2,599,628.73
North Somerset	£1,307,847.79
North Tyneside	£1,609,998.05
North Yorkshire	£3,537,549.92
Northumberland	£2,480,330.00

Nottingham	£3,556,933.83
Nottinghamshire	£5,646,450.03
Oldham	£2,419,369.23
Oxfordshire	£3,361,256.14
Peterborough	£1,824,636.27
Plymouth	£2,294,796.82
Portsmouth	£1,888,214.70
Reading	£1,130,648.94
Redbridge	£1,965,979.20
Redcar and Cleveland	£1,296,381.17
Richmond upon Thames	£836,356.66
Rochdale	£2,337,383.85
Rotherham	£2,489,029.87
Rutland	£157,371.07
Salford	£2,733,899.11
Sandwell	£3,471,442.28
Sefton	£2,435,111.24
Sheffield	£5,203,825.56
Shropshire	£2,088,795.13
Slough	£1,177,691.53
Solihull	£1,408,359.07
Somerset	£3,820,415.56
South Gloucestershire	£1,410,016.31
South Tyneside	£1,484,854.01
Southampton	£2,222,676.23
Southend-on-Sea	£1,413,078.83
Southwark	£2,734,366.02
St. Helens	£1,779,580.89
Staffordshire	£5,506,547.99
Stockport	£2,163,129.71
Stockton-on-Tees	£1,685,873.97
Stoke-on-Trent	£2,686,721.90
Suffolk	£5,106,030.02
Sunderland	£2,673,561.91
Surrey	£5,290,829.72
Sutton	£1,155,788.99
Swindon	£1,515,345.60
Tameside	£2,224,686.33
Telford and Wrekin	£1,514,547.04
Thurrock	£1,295,040.81
Torbay	£1,235,356.81
Tower Hamlets	£2,996,279.40
Trafford	£1,458,074.48
Wakefield	£3,124,926.90
Walsall	£2,819,810.19
Waltham Forest	£2,327,527.60
Wandsworth	£2,069,485.13
Warrington	£1,440,750.42
Warwickshire	£3,472,997.02

West Berkshire	£694,849.63
West Northamptonshire	£2,465,491.77
West Sussex	£4,870,362.11
Westminster	£1,951,507.12
Westmorland and Furness	£1,522,795.52
Wigan	£2,818,234.30
Wiltshire	£2,728,656.41
Windsor and Maidenhead	£587,905.21
Wirral	£3,049,345.09
Wokingham	£525,573.35
Wolverhampton	£2,631,877.25
Worcestershire	£3,949,139.19
York	£1,037,906.47
<b>Total</b>	<b>£421,000,000</b>



## Household Support Fund Grant Determination 2024 No 31/7199

The Secretary of State for Work and Pensions (“the Secretary of State”), in exercise of the powers conferred by section 31 of the Local Government Act 2003, makes the following Determination:

### Citation

1) This Determination may be cited as the Household Support Fund Grant Determination 2024 No 31/7199.

### Purpose of the grant

2) The purpose of the grant is to provide support to certain local authorities in England for expenditure lawfully incurred or to be incurred by them in accordance with the Grant Conditions to provide support to households, who would otherwise struggle to buy food or pay essential utility bills or meet other essential living costs or housing costs (in exceptional cases of genuine emergency) to help them with living costs.

### Determination

3) The Secretary of State determines as set out in **Annex A**, the authorities to which grant is to be paid and the amount of grant to be paid.

### Grant conditions

4) Pursuant to section 31(3) and 31(4) of the Local Government Act 2003, the Secretary of State determines that the grant will be paid in respect of the period 1<sup>st</sup> April 2024 to 30<sup>th</sup> September 2024 and subject to the conditions in **Annex B**.

### Treasury consent

5) Before making this Determination in relation to the upper tier local authorities in England, the Secretary of State obtained the consent of the Treasury.

Signed by authority of the Secretary of State for Work and Pensions

*James Wolfe*

A senior civil servant within the Department for Work and Pensions

26<sup>th</sup> March 2024

**Household Support Fund 2024 Grant FINAL Funding Allocations  
per County Councils/Unitary Authorities for the period 1<sup>st</sup> April  
2024 to 30<sup>th</sup> September 2024**

<b>County Councils and Unitary Authorities</b>	<b>Total Funding Allocation</b>
Barking and Dagenham	£2,162,051.52
Barnet	£2,455,182.90
Barnsley	£2,351,263.96
Bath and North East Somerset	£966,860.28
Bedford	£1,201,485.00
Bexley	£1,542,309.65
Birmingham	£12,791,135.04
Blackburn with Darwen	£1,618,526.59
Blackpool	£1,745,857.53
Bolton	£2,780,316.57
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Doncaster	£2,989,273.08
Dorset	£2,294,941.45
Dudley	£2,625,519.07
Durham	£4,676,099.65

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East Sussex	£3,896,783.88
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Essex	£9,436,542.83
Gateshead	£1,836,629.95
Gloucestershire	£3,692,483.14
Greenwich	£2,378,692.91
Hackney	£2,822,258.58
Halton	£1,297,880.42
Hammersmith and Fulham	£1,414,374.97
Hampshire	£7,124,127.25
Haringey	£2,406,671.72
Harrow	£1,476,707.18
Hartlepool	£993,021.25
Havering	£1,648,150.98
Herefordshire	£1,329,601.78
Hertfordshire	£6,172,064.84
Hillingdon	£2,069,342.07
Hounslow	£2,042,396.17
Isle of Wight	£1,131,576.08
Isles of Scilly	£11,130.10
Islington	£2,218,159.62
Kensington and Chelsea	£1,180,369.12
Kent	£11,065,380.80
Kingston upon Hull, City of	£3,038,293.68
Kingston upon Thames	£862,867.15
Kirklees	£3,702,823.27
Knowsley	£1,862,188.67
Lambeth	£2,720,637.01
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Rotherham	£2,489,029.87
Rutland	£157,371.07
Salford	£2,733,899.11
Sandwell	£3,471,442.28
Sefton	£2,435,111.24
Sheffield	£5,203,825.56
Shropshire	£2,088,795.13
Slough	£1,177,691.53
Solihull	£1,408,359.07
Somerset	£3,820,415.56
South Gloucestershire	£1,410,016.31
South Tyneside	£1,484,854.01
Southampton	£2,222,676.23
Southend-on-Sea	£1,413,078.83
Southwark	£2,734,366.02
St. Helens	£1,779,580.89
Staffordshire	£5,506,547.99
Stockport	£2,163,129.71
Stockton-on-Tees	£1,685,873.97
Stoke-on-Trent	£2,686,721.90
Suffolk	£5,106,030.02
Sunderland	£2,673,561.91
Surrey	£5,290,829.72
Sutton	£1,155,788.99
Swindon	£1,515,345.60



Tameside	£2,224,686.33
Telford and Wrekin	£1,514,547.04
Thurrock	£1,295,040.81
Torbay	£1,235,356.81
Tower Hamlets	£2,996,279.40
Trafford	£1,458,074.48
Wakefield	£3,124,926.90
Walsall	£2,819,810.19
Waltham Forest	£2,327,527.60
Wandsworth	£2,069,485.13
Warrington	£1,440,750.42
Warwickshire	£3,472,997.02
West Berkshire	£694,849.63
West Northamptonshire	£2,465,491.77
West Sussex	£4,870,362.11
Westminster	£1,951,507.12
Westmorland and Furness	£1,522,795.52
Wigan	£2,818,234.30
Wiltshire	£2,728,656.41
Windsor and Maidenhead	£587,905.21
Wirral	£3,049,345.09
Wokingham	£525,573.35
Wolverhampton	£2,631,877.25
Worcestershire	£3,949,139.19
York	£1,037,906.47
Total	£421,000,000.00

## Grant Conditions

1. In this Annex:

“the Scheme” means the use by the Authority of as much of the grant money identified in Annex A as it deems necessary to provide support to households who would otherwise struggle to buy food or pay essential utility bills or meet other essential living costs or housing costs (in exceptional circumstances of genuine emergency);

“the Department” means the Department for Work and Pensions;

“the Authority” means any local authority listed in **Annex A**;

“the Secretary of State” means the Secretary of State for Work and Pensions;

“the Grant Period” means the period of time set out in paragraph 4 of this Grant Determination;

“the Branding Manual” means the HM Government of the United Kingdom of Great Britain and Northern Ireland Branding Manual Funded by UK Government first published by the Cabinet Office in November 2022, and available at <https://gcs.civilservice.gov.uk/guidance/marketing/branding-guidelines/>, including any subsequent updates from time to time.

2. The grant is paid to the Authority to support eligible expenditure only (see paragraphs 4 to 7 below); and on the basis overall that the provision of grant funding remains subject to the Secretary of State’s ongoing satisfaction that all grant usage by the Authority complies fully with the relevant conditions.

3. The Authority must have regard to any guidance issued by the Department or sources of information and data available to it that may assist in the decision-making regarding the Scheme.

### Eligible expenditure

4. Eligible expenditure means payments made, or committed to, by the Authority or any person acting lawfully on behalf of the Authority, during the Grant Period, under the Scheme.

5. Unless the Secretary of State decides otherwise (for all Authorities or any one Authority), the Authority must determine individual eligibility in its area for assistance under the Scheme and the means by which assistance will be provided (whether

directly by the Authority or through a third party) and use the grant monies as follows:

- a) the Authority is to ensure that the grant is primarily allocated to support with the costs of energy (for heating, lighting and cooking), food, water (for household purposes, including sewerage) and other essential living needs in accordance with the Scheme guidance;
- b) by exception and where existing housing support has been exhausted, the Authority may allocate grant funds to support with housing costs as set out in the Scheme guidance;
- c) the Authority, during the Grant Period, is to facilitate applications for assistance under the Scheme from individuals who are eligible for assistance in its area;
- d) the Authority may, in accordance with the Scheme guidance, allocate a limited portion of the grant to fund the provision of advice to individuals that is likely to assist those individuals in meeting their essential living needs in the longer term and complements other assistance provided to those individuals under the Scheme.

6. If the Authority or any third party incurs any of the following costs, they must be excluded from eligible expenditure:

- a) contributions in kind,
- b) payments for activities of a political or exclusively religious nature,
- c) depreciation, amortisation or impairment of fixed assets,
- d) input VAT reclaimable from HM Revenue & Customs,
- e) interest payments or service charge payments for finance leases,
- f) gifts, other than promotional items with a value of no more than £10 in a year to any one person,
- g) entertaining (entertaining for this purpose means anything that would be a taxable benefit to the person being entertained, according to current UK tax regulations), or
- h) statutory fines, criminal fines or penalties,

and, for the avoidance of doubt, the exclusions at a) and f) above do not apply to the provision of direct assistance, including food, to the intended eligible beneficiaries of the Scheme.

7. The Authority must not deliberately incur liabilities for eligible expenditure before there is an operational need for it to do so.

## **Payment arrangements**

8. The grant will be paid in arrears following receipt by the Department of the Statement of Grant Usage described in paragraph 10.
9. If at any time the Authority becomes aware that the payment in arrears will affect the delivery of the Scheme, the Authority must inform the Department as soon as possible. The Secretary of State reserves the right to alter the timing or amount of grant payments accordingly.

## **Statement of Grant Usage**

10. The Authority must prepare a Statement of Grant Usage to be submitted to the Department at a time and in a form directed by the Secretary of State. The Statement of Grant Usage must provide details of eligible expenditure in the Grant Period. The Statement of Grant Usage must be certified by the Authority's Section 151 officer that, to the best of the officer's knowledge, the amounts shown on the Statement are all eligible expenditure and that the grant has been used for the purposes intended.
11. If the Statement of Grant Usage identifies any overpayment of grant, the Authority must, unless offset by the Department in accordance with paragraph 20, repay this amount within 30 days of being asked by the Secretary of State.
12. The Secretary of State may at any time require a validation or audit to be carried out by officers of the Department or an appropriately qualified independent accountant or auditor, on the use of the grant.

## **Progress Report and Management Information Return**

13. The Authority must provide a Progress Report and Management Information Return with the Statement of Grant Usage in a form directed, and subject to any guidance issued by, the Secretary of State.

## **Financial management**

14. The Authority must maintain a sound system of internal governance and financial controls in relation to the grant.
15. If the Authority has any grounds for suspecting financial irregularity in the use of any grant paid under this Determination, it must notify the Department immediately, explain what steps are being taken to investigate the suspicion and keep the Department informed about the progress of the investigation. For these purposes "financial irregularity" includes fraud or other impropriety, mismanagement, and the use of grant for purposes other than those for which it was provided.

## **Records to be kept**

16. The Authority must maintain reliable, accessible and up to date accounting records with an adequate audit trail for all expenditure funded by grant monies under this Determination.

17. The Authority and any person acting on behalf of the Authority must allow:

- a) the Comptroller and Auditor General or appointed representatives, or
- b) the Secretary of State or appointed representatives,

free access at all reasonable times to all documents (including computerised documents and data) and other information as are connected to the grant, or to the purposes for which grant was used, subject to the provisions in paragraph 18.

18. The documents, data and information referred to in paragraph 17 include such which the Secretary of State or the Comptroller and Auditor General may reasonably require for the purposes of 'spot checking' administrative costs or significant amounts paid under the Scheme or a financial audit of any department or other public body or for carrying out examinations into the economy, efficiency and effectiveness with which any department or other public body has used its resources. The Authority must provide such further explanations as are reasonably required for these purposes.

19. Paragraphs 17 and 18 do not constitute a requirement for the examination, certification or inspection of the accounts of the Authority by the Comptroller and Auditor General under section 6(3) of the National Audit Act 1983. The Secretary of State and Comptroller and Auditor General will seek access in a measured manner to minimise any burden on the Authority and will avoid duplication of effort by seeking and sharing information with local auditors.

## **Breach of Conditions and Recovery of Grant**

20. If the Authority fails to comply with any of these conditions, or if any overpayment or underpayment is made in relation to this grant or any amount is paid in error, or if any of the events set out in paragraph 21 occurs, the Secretary of State may reduce, suspend or withhold grant payments or require the repayment of the whole or any part of the grant monies paid, as may be determined by the Secretary of State and notified in writing to the Authority. Such sum as has been notified will immediately become repayable to the Secretary of State who may set off the sum against any future amount due to the Authority from central government.

21. The events referred to in paragraph 20 are:

- a) the Authority purports to transfer or assign any rights, interests or obligations arising under this Determination without the prior agreement of the Secretary of State,
- b) any information provided in any application for grant monies payable under this Determination, or in any subsequent supporting correspondence is found to be significantly incorrect or incomplete in the opinion of the Secretary of State,
- c) it appears to the Secretary of State that other circumstances have arisen or events have occurred that are likely to significantly affect the Authority's ability to deliver the Scheme,
- d) the Authority's Section 151 officer is unable to provide reasonable assurance that the Statement of Grant Usage, in all material respects, fairly presents the eligible expenditure in the Grant Period in accordance with the definitions and conditions in this Determination, or
- e) the Authority fails to provide the Statement of Grant Usage and a Progress Report and Management Information Return in accordance with the Grant Conditions.

## **Communications**

22. The Authority shall at all times during and following the end of the Grant Period:

- a) comply with requirements of the [Funded by UK Government Branding Manual](#) in relation to activity under the Scheme; and
- b) cease use of the Funded by UK Government logo on demand if directed to do so by the Department.

23. The Authority must publish on their website, and by any other appropriate means, such information as it considers sufficient to enable the general public to understand the Scheme (including the Authority's eligibility criteria and how the Scheme can be accessed) in accordance with the Scheme guidance.

# Household Support Fund: Guidance for County Councils and Unitary Authorities in England (1 April 2024 to 30 September 2024)

## Contents

Introduction .....	2
Objective and key principles.....	2
Types of support and eligible spend.....	3
Administrative Costs and Scheme Evaluation .....	5
Establishing eligibility .....	7
Individuals with No Recourse to Public Funds .....	8
Routes of support .....	9
Public Sector Equality Duty .....	9
Communication .....	10
Working with other organisations .....	10
Delivery Plans.....	11
Reporting and Management Information .....	11
Access to data.....	11
DWP Searchlight .....	12
Monthly data share .....	12
Unused funding returned from a TPO .....	13
Funding overlap .....	13
DWP engagement.....	14
DWP funding arrangements .....	14
Managing the risk of fraud .....	16
Complying with Subsidy (previously State Aid) rules .....	17
Contact.....	17

## Introduction

1. £421m has been made available to County Councils and Unitary Authorities in England to support those most in need with the cost of essentials via the Household Support Fund (“The Fund”). This funding covers the period 1 April 2024 to 30 September 2024 inclusive (“The Fund Period”).
2. This guidance sets out the required collaboration between the Department for Work and Pensions (DWP), County Councils and Unitary Authorities, including their delivery partners (such as District Councils as well as any charitable or third-party organisations (TPOs)) to successfully meet the policy intent within the agreed framework. It also provides the framework that County Councils and Unitary Authorities need to work within and the arrangements for distribution of funding and reporting.
3. DWP is providing funding to County Councils and Unitary Authorities (including Metropolitan Councils and London Boroughs – hereafter referred to as “Authorities”), under section 31 of the Local Government Act 2003, to administer The Fund and provide assistance to households most in need.
4. Authorities have discretion on exactly how this funding is used within the scope set out in this guidance and the accompanying Grant Determination.
5. Although this is informally considered an extension to the previous four Household Support Fund schemes, it is a new grant subject to its own grant conditions as is set out in the Grant Determination letter. Any underspends from the previous scheme cannot be carried forward.
6. This guidance sets out the objectives and framework within which The Fund should be used, and requirements for reporting to ensure The Fund successfully meets its policy intent.
7. This guidance applies to Authorities in England only and should be read in conjunction with the Household Support Fund Grant Determination issued alongside it.

## Objective and key principles

8. The objective of The Fund is to provide crisis support to vulnerable households in most need with the cost of essentials. Authorities are expected to offer support throughout the duration of The Fund Period and must develop delivery plans to reflect this.
9. When administering The Fund, Authorities are encouraged to adopt the following principles:
  - use the funding from 1 April 2024 to 30 September 2024 to meet immediate needs and help those who are struggling to afford household essentials including energy and water bills, food, and wider essentials. Authorities can also use funding to support households with housing costs where existing housing support does not meet this need, and to supplement support with signposting and advice.

- **Note:** this includes payments made, or committed to, by the Authority or any person acting on behalf of the Authority, from 1 April 2024 to 30 September 2024.



- use discretion on how to identify and support those most in need, taking into account a wide range of information.
  - work together with District Councils and TPOs including, where necessary and appropriate, other local services. This may include local charities. This may also incorporate intelligence and data from wider children's social care systems to help identify and support individuals, families and households within the scope of The Fund. It may also include receiving referrals for support and applications made on behalf of an individual from professionals working with vulnerable individuals such as: social workers; keyworkers delivering early help and family support; housing officers; health visitors; and housing support officers.
10. Whilst immediate needs should be prioritised, Authorities are encouraged to use The Fund to provide support that has a long-term sustainable impact, for example household items which would reduce bills in the long-term. Subject to the considerations around advice services, this can include support with income maximisation through advice and signposting to benefit, debt and employment services.
11. Funds should be spent or committed before 30 September 2024 and cannot be carried over for future usage. All Authorities are encouraged to ensure, wherever possible, that any vouchers issued are redeemed before the end of The Fund, or shortly thereafter, or consider recycling unused vouchers. It is acceptable for vouchers that have been purchased and delivered to households before the end of The Fund to be spent shortly thereafter (see paragraphs 87 to 91 on committed spend).
- **Note:** this includes payments made, or committed to, by the Authority or any person acting on behalf of the Authority, from 1 April 2024 to 30 September 2024.

## Types of support and eligible spend

12. The Fund is expected to support vulnerable households with energy and water bills, food, and wider essentials, and Authorities should prioritise support which offers an immediate impact to those in need. Support can be delivered through cash, vouchers or in kind. There is no prescriptive list which provides a comprehensive definition of eligible spend, but it may include spend on:
- **Energy and Water.** This may include support with energy bills for any form of fuel that is used for the purpose of domestic heating, cooking, or lighting, including oil or portable gas cylinders. It can also be used to support water bills including for drinking, washing, cooking, as well as for sanitary purposes and sewerage.
  - **Food.** This may include through vouchers, cash or in kind.
  - **Essentials linked to energy, water and food.** The Fund can be used to provide support with essentials linked to energy, water and food (for example insulation or energy efficient items which reduce bills, the purchase of equipment such as fridges, freezers, ovens, slow cookers or costs associated with obtaining these essentials such as delivery and installation). We encourage Authorities to consider

supporting households on low incomes to repair or replace white goods and appliances with more energy efficient ones, or to invest in simple energy efficiency measures which will pay back quickly, such as insulating a hot water tank, fitting draft excluders to a front door, or replacing energy inefficient lightbulbs or white goods. The intention of this is to provide sustainable support which results in immediate and potentially long-lasting savings for the household.

- **Wider essentials.** The Fund can be used to support wider essential needs not linked to energy, water or food should Authorities consider this appropriate in their area. These may include, but are not limited to, support with other bills including broadband or phone bills, clothing, period and hygiene products, essential transport-related costs such as repairing a car, buying a bicycle, or paying for fuel. This list is not exhaustive. It can also include one-off payments to prevent a crisis.
- **Advice services.** The Fund may be used to provide supplementary advice services to award recipients, including debt, benefit and/or employment advice, where Authorities consider this appropriate. Authorities are reminded that the primary intention of The Fund is to provide support for those households most in need, and we would expect any advice services to complement this. We would not expect a large portion of funding to be spent on advice services. We would expect to see a connection between the funding provided for advice services and the practical support provided through The Fund. We anticipate that a significant proportion of this will be through signposting to existing advice services funded through other routes, such as the Help to Claim scheme which supports those making a claim to Universal Credit (UC).
- **Housing costs.** The Fund can be used to provide support with housing costs to those in need. However, where eligible, ongoing housing support for rent must be provided through the Housing cost element of UC and Housing Benefit (HB) rather than The Fund. In addition, eligibility for Discretionary Housing Payments (DHPs) must first be considered before housing support is offered through The Fund. The Authority must also first consider whether the claimant is at statutory risk of homelessness and therefore owed a duty of support through the Homelessness Prevention Grant (HPG). It is expected that the focus of support should be on bills and that support for housing costs should only be given where existing housing support schemes do not meet need. Beyond this, Authorities have discretion to determine the most appropriate use of The Fund for their area, based on their understanding of local need and with due regard to equality considerations.
  - Households in receipt of HB, UC, or DHPs can still receive housing cost support through The Fund if it is deemed necessary by their Authority. However, The Fund should not be used to provide housing support on an ongoing basis or to support unsustainable tenancies. Individuals in receipt of some other form of housing support could still qualify for the other elements of The Fund, such as food, energy, water, essentials linked to energy and water and wider essentials.
  - The Fund cannot be used to provide mortgage support, though homeowners could still qualify for the other elements of The Fund (such as energy, food, water, essentials linked to energy and water and wider essentials). Where a homeowner is having difficulty with their mortgage payments, they should contact their lender as soon as possible to discuss their circumstances as lenders will have a set procedure to assist. Those who are in receipt of or

treated as receiving a qualifying benefit could be entitled to [Support for Mortgage Interest](#).

- The Fund can exceptionally and in genuine emergency be used to provide support for historic rent arrears built up prior to an existing benefit claim for households already in receipt of UC and HB. This is because these arrears are excluded from the criteria for DHPs. However, support with rent arrears is not the primary intent of The Fund and should not be the focus of spend.

13. Individual awards can be whatever type and amount is deemed appropriate by Authorities for the receiving household, bearing in mind the overall spend eligibility priorities listed above, the intention that The Fund provides support throughout The Fund Period, and the risk of fraud and error. Awards to any given household can cover several or only one of the spend eligibility categories listed above.

## **Administrative Costs and Scheme Evaluation**

14. Authority allocations also include reasonable administrative costs incurred administering The Fund. In all cases, Authorities should keep administrative costs to a reasonable level. In previous iterations of The Fund, average administrative spend was around 5% of the total allocation. We expect some variation in administrative costs between Authorities but spend should reflect the intention of the scheme to support those most in need.

15. Administration costs for each Authority will be published on [www.gov.uk](http://www.gov.uk) alongside detail of all spend and volumes related to The Fund.

16. Authorities should deduct their administration costs from the total allocation to determine the amount remaining. These include:

- staff costs
- advertising and publicity to raise awareness of The Fund (this includes costs to make material more accessible, such as translation costs, providing diverse formats, etc.)
- web page design
- printing application forms
- small IT changes, for example, to facilitate MI production.
- reasonable costs for evaluating the impact of the scheme at a local level, should Authorities wish to do so.

17. Authorities will be able to use a limited proportion of their allocations to conduct (and either fully or partially fund) local evaluation of their scheme. This will be considered as an administration cost. We would not expect there to be any significant increase in overall administrative costs because of this activity.

18. It is at the discretion of Authorities whether they choose to conduct such evaluation activity. Authorities are encouraged to consider conducting local evaluations of their schemes to provide evidence of impact and inform the best use of funding within the local area.

19. Some Authorities may deem that conducting evaluation is not proportionate given the resource and cost required relative to the size of their allocation, or if existing local evaluation evidence is already available.
20. The main focus of an evaluation funded in this way should aim to understand the characteristics and experiences of those who are and/or have been in receipt of support from The Fund and the impact this has had on them. To support this, Authorities could also consider the effectiveness of the different ways in which funding is administered and used.
21. Local evaluation activities may include: data collection (for example, quantitative surveying and/or qualitative interviewing with recipients, recipient representatives and/or delivery partners of The Fund) and analysis and report writing.
22. All DWP-funded evaluation activity (where this is either fully or partially funded from the Authority's allocation) must:
  - Be undertaken robustly, with regard to the Social Research Association guidance for conducting high-quality research ([What is high-quality social research.pdf \(the-sra.org.uk\)](https://www.sra.org.uk)) to ensure meaningful and usable insights can be drawn from the findings, which are representative of the local area as far as possible.
  - Be carried out with regard to the Government Social Research ethical assurance for Social and Behavioural research: [GSR Ethical Assurance for Social and Behavioural Research - GOV.UK \(www.gov.uk\)](https://www.gov.uk) to ensure appropriate ethical standards and compliance with GDPR for anyone involved in the research process.
  - Be based on voluntary participation via informed consent. Receipt of support from The Fund must in no way be dependent on individuals participating in evaluation research.
23. To enable evaluation activities, Authorities may wish to consider informing HSF recipients that they may be contacted in future for evaluation activities to enable collection of relevant contact details for follow-up research.
24. Subject to interest, DWP can provide further analytical advice and support on evaluations to Authorities.
25. If the Authority will be spending, in accordance with this guidance, any of the Fund on evaluation activity, this must be reflected in their delivery plan. This spend should be captured within total administrative costs in the MI returns, and also reported there separately so that the dedicated amount spent on evaluation can be determined.
26. If allocation funds are used to carry out evaluation activities, aggregated and anonymised findings must be shared with DWP, and DWP/the Authority may also choose to share these with other Authorities to collate learning.
27. Completed findings from any evaluation activity (fully or partially funded from Authorities' allocations) must be shared with DWP by the deadline of submitting the final MI return in October 2024.

28. Authorities are still able to independently conduct their own self-funded evaluation activities on The Fund. In that case, they may still wish to adhere to the above guidance as a matter of good practice.

## **Establishing eligibility**

29. The Fund is intended to support a wide range of low-income households and is not limited to those in receipt of benefits. Authorities have the flexibility within The Fund to identify which vulnerable households are in most need of support and apply their own discretion when identifying eligibility.

30. Authorities are encouraged to work together with neighbouring Authorities to help prevent double provision and/or no provision, especially where the allocation of provision may take place in one area but the award recipient has a residential address in another area.

31. In accordance with their general legal duties, Authorities must have a clear rationale or documented policy/framework outlining their approach, including how they are defining eligibility and how households access The Fund. We expect Authorities to review any existing approach and to have a strong rationale for their targeting so that funding is available to the households who most need it.

32. As part of this, Authorities should make clear in an accessible format who is eligible for support and how those seeking support can access The Fund. This should align with The Fund's communication requirements outlined in paragraphs 49-51.

33. Rather than focus on one specific vulnerable group, Authorities should use the wide range of data and sources of information at their disposal, including through engagement with relevant TPOs, to identify and provide support to a broad cross section of vulnerable households to prevent an escalation of problems. It is important to stress that The Fund is intended to cover a wide range of low-income households in need, including families with children of all ages, pensioners, unpaid carers, care leavers and disabled people, larger families, single-person households, and those struggling with one-off financial shocks or unforeseen events.

34. Disabled people in particular may be facing acute challenges to meet additional needs in order to manage their conditions, remain independent and avoid becoming socially isolated. For example, some disabled people may have increased utility bills due to the usage of equipment, aids or adaptations associated with their disability. They may also have additional heating, water or transport costs. Authorities are therefore strongly encouraged to explore ways in which this group may be supported and must record the total value of awards granted to disabled people in their Management Information (MI) returns for this grant.

35. Authorities should also consider providing support to care leavers in their area. Care leavers can face particular barriers as they leave the care system and begin to live independently. For example, care leavers may not have access to the same familial networks as others in their cohort and subsequently will not have the same financial, emotional or social support systems that enable them to live independently, respond to crisis or avoid becoming socially isolated.

36. Authorities should also consider providing support to people with caring responsibilities in their area. People with caring responsibilities may be facing acute challenges incurred through their fulfilling these responsibilities for vulnerable citizens. For example, they may have additional heating, water or transport costs. Authorities are therefore encouraged to explore ways in which this group may be supported.

37. DWP is providing data and information to Authorities to support them to identify those in need in their area as follows:

- information relating to UC claims with limited capability for work or earnings below the Free School Meals and free prescription thresholds;
- data on people receiving the Guarantee Credit and/or Savings Credit elements of Pension Credit;
- data on people on income-related (IR) Employment and Support Allowance (ESA IR);
- data on people who are in receipt of HB only.

38. However, support is not restricted only to vulnerable households in receipt of benefits. Therefore, Authorities should also use other sources of information to identify vulnerable households, including by taking advice or application referrals from professionals who come into contact with vulnerable households such as: social workers; keyworkers delivering early help and family support; health visitors; and housing support officers.

39. Where Authorities proactively identify households who may benefit from support, they should consider how they can ensure that they are focusing on those in the most need to prevent an escalation of problems. There is no requirement for Authorities to undertake a means test or conduct a benefit check unless this specifically forms part of the Authority's local eligibility criteria. However, in relation to housing costs, Authorities must establish whether other forms of support are available to the household, such as DHPs.

40. Authorities should not make eligibility conditional on being employed or self-employed, or directly linked to a loss of earnings from employment or self-employment. This will ensure that there is no National Insurance contribution liability payable on any payments by either the citizen, the Authority or the employer.

## **Individuals with No Recourse to Public Funds**

41. Authorities can provide a basic safety net support to an individual, regardless of their immigration status, if there is a genuine care need that does not arise solely from destitution, for example if:

- there are community care needs
- they have serious health problems
- there is a risk to a child's wellbeing

42. The rules around immigration status have not changed. Authorities must use their judgement to decide what legal powers and funding can be used to support

individuals who are ineligible for public funds or statutory housing assistance. The Fund does not create new, or restrict existing, Authority powers or duties to support people with No Recourse to Public Funds but provides additional funds which Authorities can use on a case-by-case basis for expenditure on their existing powers and duties (where the support also falls within the scope of The Fund).

## **Routes of support**

43. Authorities have the ability to deliver the scheme through a variety of routes including: proactive support by identifying households in need; application-based support where individuals approach the Authority for support; or issuing grants to TPOs to provide support on behalf of the Authority.
  
44. As part of their offer, every Authority must operate at least part of their scheme on an application basis – in other words, people should have the opportunity to come forward to ask for support. There is flexibility on exactly how this can be run, including through TPOs rather than directly by the Authority. We expect Authorities to offer application-based support throughout the duration of The Fund, either continuously over the majority of The Fund Period, or at regular intervals throughout the scheme. If delivering application-based support through TPOs, the Authority remains accountable for the eligibility criteria of these partners and must work with them to establish these (please see *Working with Organisations* for further information). Authorities can make the entirety of their scheme application-based if they so wish. Authorities must make sure that this support is clearly advertised and is inclusive and accessible.
  
45. When deciding how to help people, Authorities should consider how they plan to provide support to vulnerable households, such as by paying into bank accounts, use of cash and vouchers, provision of goods. When determining the most appropriate mechanism of providing support for households, Authorities should consider:
  - any potential risks to vulnerable individuals, for example the risk of holding cash;
  - any fraud risks associated with these payment methods (see section 'Managing the risk of fraud' at paragraphs 93 -104 for further information).

## **Public Sector Equality Duty**

46. In accordance with the Public Sector Equality Duty, DWP has had due regard to the potential equalities impacts of this grant.
  
47. Under the Equality Act 2010, all public authorities must comply with the Public Sector Equality Duty. For the purposes of this grant, you should consider how any support that helps people facing severe financial hardship impacts those with characteristics protected under the Equality Act.
  
48. When developing your local delivery frameworks, you should ensure people are not disadvantaged or treated unfairly by The Fund. For example, any application process should be easy to access and to navigate.



## Communication

49. It is mandatory for Authorities to reference that the grant is funded by the UK Government in any publicity material, including online channels and media releases. This includes use of logos as per the [Funded by UK Government Branding Manual](#) provided to all Authorities. This requirement extends to other public bodies (such as District Councils) delivering the scheme on behalf of the Authority, and the Authority is responsible for ensuring that this responsibility is met.
50. It is mandatory for Authorities to make public their plans for The Fund, including how and when they intend to deliver the application-based portion of their scheme. This should be through a website page dedicated to The Fund headed with 'Household Support Fund' on their Authority website. This webpage must be easily accessible and outline the Authority's plans for funding, including with details of who is eligible in the area, as well as how and when people might be able to apply for the application-based element of the scheme. It should include a specific reference that the grant is funded by the UK Government as per the Funded by UK Government Branding Manual.
51. Authorities should consider inclusive and accessible ways in which they might advertise the availability of The Fund to local people for example in local family or community hubs and GP surgeries. We expect Authorities to advertise the scheme – and in particular the application-based element of their provision – through various channels and not just online.

## Working with other organisations

52. Authorities should work collaboratively with District Councils and organisations to meet the objectives of identifying and supporting those most in need. This includes working closely with the third sector and other partner organisations who may come into contact with people in need.
53. Authorities that do not have the mechanisms in place to administer this grant should consider whether District Councils are better placed to do so on their behalf. Authorities are encouraged to engage with District Councils as quickly as possible to ensure roles, responsibilities and effective arrangements are put in place to deliver The Fund promptly and efficiently.
54. TPOs may include but are not limited to:
- registered charities and voluntary organisations
  - schools
  - food banks
  - general practitioners
  - organisations providing support in particular circumstances (such as but not limited to "baby banks")
55. Where Authorities are working with TPOs, this should be done on an objectively fair, transparent and non-discriminatory basis whilst having regard to the time available to deliver The Fund. As with District Councils, Authorities should make arrangements with any TPOs as quickly as possible.



56. Where Authorities are delivering their application-based support through a TPO, transparent eligibility criteria should be agreed with the TPO. Where organisations are acting only as a referral partner, Authorities should ensure the referral partners and the individual applicants are made aware that Authorities remain the ultimate decision maker on the provision of any support from The Fund.

## **Delivery Plans**

57. Authorities are required to complete a delivery plan to outline their intentions for The Fund, clearly setting out their priorities and approach for use of the Fund, and to demonstrate the ways in which they intend to allocate their funding.

58. Authorities are required to send the delivery plan to DWP by 10 May. At the end of The Fund Period we will also ask for a summary of spend against the final delivery plan with this due at the same time as the final MI in October 2024. Delivery plans must be signed off by the Authority's Section 151 Officer. Delivery plans must include the contact information of the Section 151 Officer/Chief Finance Officer (CFO) and responsible Cabinet Member before submission to DWP. Authorities are responsible for informing DWP of changes to Section 151 Officer/CFO or responsible Cabinet Member.

59. Authorities are required to appoint an appropriate Senior Responsible Officer who will be accountable for ensuring a strong delivery plan is developed and agreed through necessary decision-making mechanisms including engagement with the relevant Cabinet Member and ensuring compliance with and progress against their commitments in the delivery plan. Responsible Cabinet Members in each Authority are obligated to have read and agreed to their local delivery plan before its submission to DWP.

60. We understand that local priorities for The Fund may change over the course of The Fund Period, including in response to local feedback such as from professionals working with households. Authorities should engage with DWP if they wish to revisit their delivery plan during The Fund Period.

## **Reporting and Management Information**

61. Authorities are required to comply with DWP's reporting and MI requirements. For full details of MI and reporting requirements, see Household Support Fund (April 2024 – September 2024) MI Reporting Requirements.

## **Access to data**

62. The Household Support Fund is being classified as Local Welfare Provision (LWP). The provision of DWP data to Authorities is under the terms of the Memorandum of Understanding (MoU) between the 'Department for Work and Pensions and LAs (Access, handling, exchange and protection of DWPs' and HM Revenue and Customs' data)'.

63. Authorities who have signed and returned the relevant section (Annex C) of the current DWP/LA MoU have legal permission to access DWP's Searchlight portal and specific UC, Pension Credit, ESA (IR) and HB only data through a monthly data share for the purpose of The Fund.
64. Authorities will need to ensure they sign future iterations of the MoU and the appropriate Annex to continue to have the legal permission to access the data sources for LWP.
65. Staff accessing Searchlight will need to be registered with the Employee Authentication System. Further information on Searchlight can be found in the Local Authority Searchlight Training Pack available in the Searchlight folder on Glasscubes (the LA/DWP online collaboration tool). If your Authority needs to discuss access to Glasscubes, contact DWP at [lawelfare.lasupport@dwp.gov.uk](mailto:lawelfare.lasupport@dwp.gov.uk)

## DWP Searchlight

66. This portal provides information on individual citizens' entitlement to (and confirms receipt of) DWP welfare benefits. Therefore, this data can be used to help Authorities identify and target those families and individuals to support. Authorities may also wish to establish if other forms of support are available to the household. In relation to housing costs this must include checking whether the household could receive DHPs. The Authority must also first consider if the claimant is at statutory risk of homelessness and, therefore, owed a duty of support through the HPG.
67. Searchlight can only be used to verify a specific individual's DWP benefit information. Therefore, if an Authority identified a group of potential claimants who may be eligible for The Fund from their own records, they can access Searchlight to verify each claimant's DWP benefit entitlement (although benefit entitlement is not a condition of support).

## Monthly data share

68. The UC, Pension Credit, ESA (IR) and HB only data will be provided monthly via Transfer Your File.
69. Authorities will receive two data shares on a monthly basis:
- **File one** - contains individual data of the National Insurance number, names and addresses (where available) of UC claimants within the Authority area and:
    - income below the thresholds of £7,400 per year for FSMs and income below the free prescription threshold of £935 per month as identified in their last UC assessment period
    - those with a Limited Capability for Work indicator within the last assessment period
    - the number of children in the household.
    - those whose award is subject to the benefit cap
    - those with a deduction for Removal of the Spare Room Subsidy and who receive Local Housing Allowance

- the National Insurance number, names, addresses and contact telephone numbers of those in receipt of Guarantee Credit and/or Savings Credit element of Pension Credit and their appointees if appropriate, as well as for all claimants on ESA (IR).
- the National Insurance number, names, addresses and contact telephone numbers of customers who are in receipt of HB but not in receipt of a means tested benefit (for example: UC, Income based Jobseekers Allowance, ESA (IR), Income Support and Pension Credit) or Tax Credits.

**File two** - contains aggregate data showing those UC claimants that are:

- at or below the FSM income threshold
- at or below the free prescription income threshold, and
- in the Limited Capability for Work group.

70. For a full breakdown of the file contents see Local Welfare Provision monthly data share field definitions at Annex A.

71. Authorities also have access to their own non-DWP data to help identify vulnerable households who may be eligible for support under The Fund.

## **Unused funding returned from a TPO**

72. Where a TPO returns unused funding before the end of The Fund Period, the Authority is free to spend that funding in any eligible category for the duration of The Fund Period.

73. Where a TPO returns unused funding after The Fund Period has ended the Authority can re-issue any returned funding within a reasonable timeframe, but only under the same category that the spend was originally reported against. Authorities are able to distribute this funding themselves and do not have to go back through the original TPO.

74. For audit purposes, where an Authority re-issues returned TPO funding after The Fund Period has ended, they must confirm the following by email to **lawelfare.pdt@dwp.gov.uk** (copying in their Section 151 Officer/CFO):

- the amount that has been returned;
- reason for the return (for example TPO underspend);
- what the original spend was reported against in their **final** MI return;
- the intention to spend the total unspent amount against the same category of spend for the same group.

## **Funding overlap**

75. Authorities should consider household circumstances when making a decision on how to spend The Fund. Households could be receiving other forms of support, and this should be taken into account to avoid duplicating provision where possible. However, households receiving other forms of assistance are not excluded from receiving support through The Fund.

## **DWP engagement**

76. LA Performance Relationship Mangers (PRMs) from DWP's LA Partnership, Engagement and Delivery (LA-PED) division will contact Authorities to provide support and gather information throughout The Fund. LA-PED will contact Authorities for initial compliance (where necessary) including where:

- the MI templates have not been copied to the Authority's Section 151 Officer or Chief Finance Officer.
- an incorrect template has been used – MI should only be returned on the MI template provided. No local versions or PDF copies are acceptable.

77. They will also contact Authorities where further clarification is needed in respect of the information provided on the MI reporting template, if for example:

- Critical data is missing, or the data looks odd.
- the Authority is reporting a high value of awards where they have not been able to establish the household composition. We may need the Authority to explain why that is the case and provide supporting evidence.
- the Authority is reporting a high value of administration costs. We may need the Authority to explain why that is the case and provide supporting evidence.
- there is a significant gap between actual and allocated spend. We may need the Authority to explain why spend was so low.

78. They will look to identify good practice and identify case studies where appropriate.

79. DWP will continue to respond to questions we receive via the designated inbox as quickly as possible. DWP will also continue to engage with Authorities throughout the course of The Fund Period and will provide opportunities to engage with the department and other Authorities to share good practice and work collaboratively. DWP may host Ministerial engagement roundtable events as required. Where Authorities are invited to these events, an appropriate representative will be expected to attend.

80. Where Authorities work with District Councils and TPOs it is the responsibility of Authorities to collect and collate MI and complete one collated MI return and submit to DWP.

## **DWP funding arrangements**

81. The Fund is ring-fenced to be spent as detailed in this guidance and the accompanying Grant Determination. To ensure that the objectives of The Fund are being met during the course of the grant and reduce administration costs for all concerned, including the need for DWP to recover underspend, grant payment will be made in arrears upon DWP being satisfied with the MI returns. This will enable DWP to adjust the amount of the payment based on the MI returns.

82. Payment of The Fund from DWP to Authorities will be made in arrears after the interim MI returns in July 2024 and the final MI return at the end of The Fund Period in September 2024 after DWP has verified the MI. If an Authority feels that the payment arrangements will create significant cash flow problems, please notify DWP as soon as possible with supporting evidence. One interim return and a final MI return will be required, and grant payments will be made in respect of the periods 1 April 2024 to 30 June 2024 and 1 April 2024 to 30 September 2024.
83. MI returns must be endorsed by the Section 151 Officer/CFO in accordance with their statutory assurance responsibility in order for the grant payment to be made.
84. Authorities must copy their Section 151 Officer/CFO into the email.
85. The guidance for completion is provided within the Household Support Fund (April 2024 – September 2024) MI Reporting Requirements document.
86. For MI purposes, the definition of spend is grant funding that has been provided to vulnerable households, within the scope of the eligibility criteria, and within The Fund Period of 1 April 2024 to 30 September 2024.
87. Spend also includes 'committed spend'. For the purpose of The Fund committed spend relates to grant funding that has been spent and delivered to vulnerable households even though the vulnerable household may not have used their grant funding. An example would be the award of a food voucher on 30 September 2024 to a vulnerable household. It would be unreasonable to expect the household to be restricted to redeem the voucher on the day of receipt. In this example, spend has been committed by the Authority, support has been provided to a vulnerable household and, therefore, should be included as eligible grant spend. It would be reasonable to expect the vulnerable household to redeem the food voucher during the month following the end of The Fund.
88. However, committed spend does not include large volumes of food vouchers, procured quite late in The Fund, which cannot be distributed to vulnerable households within The Fund Period.
89. Authorities that plan to order vouchers in bulk should attempt to be realistic in the volumes ordered to avoid holding large stocks of unused vouchers at the end of The Fund. Alternatively, Authorities may want to consider:
- purchasing vouchers on a sale or return basis, so that they can return any unused vouchers; or
  - recycling and re-issuing expired vouchers returned to an Authority after The Fund has ended, provided this is done within a reasonable timeframe, under the same categories of spend as originally reported, and under the same terms as The Fund they were issued under.
90. For audit purposes where an Authority recycles and reuses expired vouchers the Authority must confirm by email to [lawelfare.pdt@dw.gov.uk](mailto:lawelfare.pdt@dw.gov.uk), copying in the Section 151 Officer/CFO:
- the amount that has been returned
  - reason for the return (for example, expired voucher)
  - what the original spend was reported against in their **FINAL MI** return

- confirm they intend to spend the total unspent amount against the same category of spend for the same group.

91. The definition of committed spend for the purpose of The Fund does not affect its accounting treatment in accordance with normal rules.

92. The timetable for provision of funding is as follows:

**Funding:**

<b>Payment</b>	<b>Amount</b>	<b>Date</b>	<b>Notes</b>
Interim	Actual grant spend of up to 100% of allocation*	September/October 2024	Payment made in arrears
Final	Actual grant spend up to 100% of grant allocation* less any previous interim payment	December 2024/January 2025	Payment made in arrears

\*Subject to eligible spend criteria

**Managing the risk of fraud**

93. Fraudsters can target funds of this type.

94. As with any welfare payment to vulnerable recipients there is a risk of fraud, as recipients might appear to be eligible when they are not.

95. To help mitigate this risk, Authorities should involve District Councils and other organisations chosen to administer The Fund to help identify vulnerable families, households and individuals.

96. Authorities wishing to work with TPOs to deliver The Fund must carry out suitable due diligence checks to ensure they are viable and able to deliver the support. So, for example, ensuring all charities are registered and taking extra caution if they are new organisations.

97. Authorities are also encouraged to ensure checks are in place to verify the identity of those eligible.

98. It is for Authorities to decide how payments are made to recipients. However, when making decisions, Authorities should consider the risks involved. Although they still carry fraud risks, vouchers should be used instead of cash where possible as this helps to mitigate the risk of the money being spent by the recipient on things outside of the policy intent.

99. Authorities should ensure that they consider and put in place suitable controls when making use of vouchers as part of The Fund. Authorities may wish to consider restricting access to these vouchers; and also consider restricting usage to ensure that they cannot be spent outside the intended scope of The Fund.
100. It is important to be vigilant to fraud and error risks in relation to housing costs, and to assure yourself that the appropriate checks are in place. Authorities should take appropriate steps, which may be requested and reviewed as set out in the Grant Determination, to ensure they take into consideration household income and rent liability. We expect Authorities to work with district councils to ensure support is going to those with genuine need and to help minimise the risk of fraud on housing support.
101. Where possible, any payments made into a bank account should be in the same name of the person that is eligible for that payment. Authorities have access to a range of data sources, and checks can be carried out against this data to verify the identity of the recipient. Authorities are also encouraged to use existing tools at their disposal to verify personal bank accounts.
102. If the Authority has any grounds for suspecting financial irregularity in the use of any grant paid under the determination, it must notify DWP immediately, explain what steps are being taken to investigate the suspicion and keep DWP informed about the progress of the investigation. For these purposes 'financial irregularity' includes fraud or other impropriety, mismanagement, and the use of grant for purposes other than those for which it was provided.
103. If you suspect fraud, you should notify DWP of the:
- number of instances;
  - total amount lost.
104. This will help DWP identify any emerging threats and share them with other Authorities, so they can take steps to prevent and detect any fraud in their Fund.

## **Complying with Subsidy (previously State Aid) rules**

105. The funding is intended to benefit households most in need of support with energy bills, food, related essentials, wider essentials and (in limited circumstances where existing housing support does not meet need) housing costs. This is in order to help provide targeted support to those who need it with the cost of household essentials. The funds should not be used for any economic undertaking.
106. Whichever way you use the funding, including where you work in partnership with others, you should consider all Subsidy rules (previously State Aid) issues. Check whether the 'de minimis' regulation exception applies. You should also follow government procurement procedures where relevant.

## **Contact**

107. If you have any queries about the content of this guidance or use of the funding, you can contact [lawelfare.pdt@dwp.gov.uk](mailto:lawelfare.pdt@dwp.gov.uk)

## Local Welfare Provision monthly data share field definitions

The definitions will be updated to include information regarding the additional data share of those who are in receipt of HB only when the details are confirmed.

### File 1 – The list of Individuals:

Field Name	Description
claimant1_nino	The national insurance number (NINO) of the lead UC claimant
claimant1_surname	The surname of the lead UC claimant in the Household
claimant1_forename1	The forename of the lead UC claimant in the Household
claimant2_nino	If applicable the NINO of the UC partner in the household. In some cases this may be the same as the UC claimant NINO, usually where the partner NINO data is not available.
claimant2_surname	The surname of the UC partner if Claimant 2 NINO provided
claimant2_forename_1	The forename of the UC partner if Claimant 2 NINO provided
ap_start_date	The start date of the household's UC assessment period (AP)
ap_end_month	This will always be the month of the extract.
has_children_latest_ap	Set to 1 if the UC Household is recorded to have children in the AP used for the extract 1= children 0 = no children
total_children	The number of children recorded in the UC Household for the AP used in the extract, null = no children, the field HAS_CHILDREN_LATEST_AP will also be 0 if there are no children
has_lcw_latest_ap	Set to 1 if a member of the UC Household is in the UC limited capability for work group
eligible_prescription_latest_ap	Set to 1 if the UC Household is below the Free Prescription threshold
earnings_below_fsm_threshold	Set to 1 if the UC Household is below the Free School Meal threshold
country_name	England Scotland



	Wales
local_authority_name	Your LA name
local_authority_code	the standard lookup code for your authority
tyf_la_id_code	the LA ID code as registered on Transfer Your File for your authority
postcode_outward_code	Postcode sector in the ward
ward_name	Name of the ward
ward_code	Code of the ward
cap_applied	True, False or Null
spare_room_subsidy_removal	True, False or Null
local_housing_allowance_applied	True, False or Null
BENEFIT_TYPE	Will show one of the following: UC PC GC SC SC/GC ESA-IR HB
PC/ESA-IR/HB_NINO	The NINO of the PC/ESA-IR/HB customer
PC/ESA-IR/HB_SURNAME	The surname of the PC/ESA-IR/HB customer
PC/ESA-IR/HB_FORENAME_1	The first name of the PC/ESA-IR/HB customer
UC/PC/ESA-IR/HB_ADDRESS_LINE_1	The UC/PC/ESA-IR/HB customer address as recorded on the PC/ESA-IR/HB claim
UC/PC/ESA-IR/HB_ADDRESS_LINE_2	The UC/PC/ESA-IR/HB customer address as recorded on the PC/ESA-IR/HB claim
UC/PC/ESA-IR/HB_ADDRESS_LINE_3	The UC/PC/ESA-IR/HB customer address as recorded on the PC/ESA-IR/HB claim
UC/PC/ESA-IR/HB_ADDRESS_LINE_4	The UC/PC/ESA-IR/HB customer address as recorded on the PC/ESA-IR/HB claim
UC/PC/ESA-IR/HB_POSTCODE	The postcode as recorded on the UC/PC/ESA-IR/HB customer claim
PC/ESA-IR/HB_TELEPHONE_NO1	The telephone number of the PC/ESA-IR/HB customer as reported on the PC/ESA-IR/HB claim
PC/ESA-IR/HB_TELEPHONE_NO2	The second telephone number (if applicable) of the PC/ESA-IR/HB customer as reported on the PC/ESA-IR/HB claim
PC_APPOINTEE_SURNAME	If appropriate the surname of the Personal/Corporate Acting Body as reported on the PC claim
PC_APPOINTEE_FORENAME_1	If appropriate the forename of the Personal/Corporate Acting Body as reported on the PC claim
PC_APPOINTEE_ADDRESS_LINE_1	If appropriate the address of the Personal/Corporate Acting Body as reported on the PC claim

PC_APPOINTEE_ADDRESS_LINE_2	If appropriate the address of the Personal/Corporate Acting Body as reported on the PC claim
PC_APPOINTEE_ADDRESS_LINE_3	If appropriate the address of the Personal/Corporate Acting Body as reported on the PC claim
PC_APPOINTEE_ADDRESS_LINE_4	If appropriate the address of the Personal/Corporate Acting Body as reported on the PC claim
PC_APPOINTEE_POSTCODE	If appropriate the address of the Personal/Corporate Acting Body as reported on the PC claim
PC_APPOINTEE_TELEPHONE_NO1	If appropriate the telephone number of the Personal/Corporate Acting Body as reported on the PC claim
PC_APPOINTEE_TELEPHONE_NO2	If appropriate the second telephone number of the Personal/Corporate Acting Body as reported on the PC claim

## File 2 – The Aggregate file

This shows for your Authority:

Country (England, Scotland or Wales)

Local Authority (the name of your Authority)

LOCAL\_AUTHORITY\_CODE (the standard lookup code for your authority)

TYF\_LA\_ID\_CODE (the Transfer Your File code for your authority)

For each postcode sector (POSTCODE\_OUTWARD\_CODE) in a ward (WARD\_NAME), (WARD\_CODE)

Number of Households in the ward with UC Limited Capability to Work group (HAS\_LCW\_LATEST\_AP)

Number of UC households in the Authority without children (HHS\_NO\_CHILDREN\_IN\_LA)

Number of UC households in the Authority with children (HHS\_WITH\_CHILDREN\_IN\_LA)

Number of children in the Authority in UC households with children (NO\_OF\_CHILDREN\_IN\_LA)

Number of UC households without children in the postcode sector that are below the Free School Meal income threshold and free prescription threshold (HHS\_NO\_CHILDREN\_PRESC\_OR\_FSM)

Number of UC households without children in the postcode sector that are below the Free Prescription income threshold (HHS\_NO\_CHILDREN\_PRESC)

Number of UC households without children in the postcode sector that are below the Free School meal income threshold (HHS\_NO\_CHILDREN\_FSM)

Number of UC households with children in the postcode sector that are below the Free School Meal income threshold and free prescription threshold (HHS\_WITH\_CHILDREN\_PRESC\_OR\_FSM)

Number of UC households with children in the postcode sector that are below the Free Prescription income threshold (HHS\_WITH\_CHILDREN\_PRESC)


Number of UC households with children in the postcode sector that are below the Free School meal income threshold (HHS\_WITH\_CHILDREN\_FSM)

Number of children in UC households in the postcode sector that are below the Free School Meal income threshold and free prescription threshold (CHILDREN\_PRESCRIPTIONS\_OR\_FSM)

Number of children in UC households in the postcode sector that are below the Free Prescription income threshold (CHILDREN\_PRESCRIPTION)

Number of children in UC households in the postcode sector that are below the Free School meal income threshold (CHILDREN\_FSM)

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 <p><b>Brent</b></p>	<p><b>Cabinet Decision</b> 28 May 2024</p>
	<p><b>Report from the Corporate Director, Neighbourhoods &amp; Regeneration</b></p>
	<p><b>Lead Member - Cabinet Member for Regeneration, Planning &amp; Growth (Councillor Shama Tatler)</b></p>
<p><b>Review of Brent’s Conservation Areas</b></p>	

<b>Wards Affected:</b>	Brondesbury Park, Cricklewood & Mapesbury, Harlesden & Kensal Green, Kenton, Kingsbury, Northwick Park, Queen’s Park and Willesden Green.
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>List of Appendices:</b>	<p>Appendix A: Proposed Kensal Rise Conservation Area map.</p> <p>Appendix B: Proposed boundary extension maps to Brondesbury, Harlesden, Mapesbury, Queen’s Park and Willesden Conservation Areas and the Reduction to boundary for Buck Lane.</p> <p>Appendix C: De-designation of Sudbury Cottages maps.</p> <p>Appendix D: Northwick Circle removal of Article 4 map.</p> <p>Appendix E: Immediate and non-immediate Article 4 maps</p> <p>Appendix F: Character Appraisals</p> <p>Appendix G: Summary of representations</p>
<b>Background Papers:</b>	<p><a href="#">Review of Brent’s Conservation Areas</a></p> <p><a href="#">Brent’s Historic Environment Placemaking Strategy, May 2019</a></p>
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	<p>Mark Price, Principal Heritage Officer 020 8937 5236 <a href="mailto:mark.price@brent.gov.uk">mark.price@brent.gov.uk</a></p>

## **1.0 Executive Summary**

- 1.1. To consider representations received to a consultation upon, and approve changes to, Brent's conservation areas including de-designation, extension to boundaries and designation (noting results of consultation) and associated making of and removing Article 4 Directions.

## **2.0 Recommendation(s)**

### **2.1 That Cabinet Approve:**

- a) the designation of the Kensal Rise Conservation Area (as shown on the boundary map Appendix A).
- b) the extension of the boundary to the Brondesbury Conservation Area, the Harlesden Conservation Area, the Mapesbury Conservation Area, the Queen's Park Conservation Area and the Willesden Green Conservation Area (as shown on the boundary maps in Appendix B).
- c) the reduction to the boundary of the Buck Lane Conservation Area and the de-designation of the Sudbury Cottages Conservation Area (as shown in Appendix C).
- d) the removal of Article 4 Directions from the Northwick Circle Conservation Area and the Sudbury Cottages Conservation Area (as shown in Appendix D).
- e) the making of immediate or non-immediate Article 4 Directions (as required) as shown in Appendix E.
- f) the accompanying character appraisals for each area replacing the existing appraisals as required (Appendix F) subject to any necessary minor changes, such as grammatical errors being addressed.
- g) consultation on an extension to the Willesden Green Conservation Area boundary to include 126 to 148 Brondesbury Park and delegate the decision on whether to confirm to the Corporate Director of Neighbourhoods and Regeneration.

## **3.0 Detail**

### **Cabinet Member Foreword**

- 3.1 Historic buildings and conservation areas are important to the environmental sustainability and the quality of life. They play a pivotal role in safeguarding the assets and landmarks that represent the richness of Brent's unique identity and charm. Preserving existing buildings is a practical solution, and retrofitting offers a viable and advantageous alternative to new construction. Residents are therefore generally in favour of retention and enhancement of local character

and distinctiveness. Such areas are also often the best in conserving ecosystems, biodiversity and halting climate change.

- 3.2 Local planning authorities have a duty under the Planning (Listed Buildings and Conservation Areas) Act 1990, to determine and review which parts of their area are of special architectural or historical interest, the character or appearance of which it is desirable to preserve or enhance, and to designate such areas as conservation areas. Such management of our conservation areas is essential if we are to provide efficiency of resources and make positive changes to our local communities on many of the issues that matter such as where they live.
- 3.3 The designation of a conservation area creates a precautionary approach to the demolition or alteration of buildings (and the felling & pruning of trees) which is managed through the planning application process. It also comes with the additional, potential benefit of creating a unique sense of place-based and place-making identity, encouraging community cohesion, good design and promoting regeneration. It ensures sustainability is central to the growth of our borough and local economy. The consultation on the conservation area review has involved local residents, consultees and residents' associations. The new boundaries will come with further guidance on planning matters to help residents. The proposals also advocate the better management of resources by recommending de-designation and relaxation of Article 4 Directions.
- 3.4 Conservation areas also make people feel part of the community helping our streets to be cleaner and healthier. It is widely recognised that in most cases total demolition uses more carbon than the retention, renovation and retrofitting. Trees of course are the ultimate carbon capture and storage machines. This is supported by Brent's Climate Emergency Strategy 2021-2030 which advocates the need to reduce emissions from building and construction both the operational emissions and the embodied carbon. This is important if Brent is to meet its target of being net zero carbon by 2030. A number of the proposals include town centres where good design will create stronger partnerships to ensure our high streets, businesses and local organisations are able to thrive.

## **Background**

- 3.5 A survey of Brent's existing conservation areas was last undertaken in 2004. This led to the de-designation of 10 conservation areas. However, the survey did not consider or review the boundaries of the existing conservation areas, nor was there a full survey of the borough to consider if other areas merit designation. A review is therefore required to reappraise existing boundaries, de-designate areas if necessary, and assess the merits of potential new areas which may have been overlooked.
- 3.6 Such reviews are a statutory requirement under Section 69(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990, which directs local planning authorities to review their conservation areas from time to time. A review was also recommended by Brent's Historic Environment Placemaking Strategy (2019) which was prepared to support the Brent Local Plan.

- 3.7 The following conservation areas were identified in the Historic Environment Placemaking Strategy as priority for a boundary review.

Conservation area	Date designated	Ward	Action
Brondesbury	1990	Brondesbury Park	Addition to boundary
Buck Lane	1979	Kingsbury	Reduction to boundary
Harlesden	1994	Harlesden & Kensal Green	Addition to boundary
Kensal Rise (Proposed)		Queen's Park	New Conservation Area
Mapesbury	1982	Cricklewood & Mapesbury	Addition to boundary
Northwick Circle	1989	Kenton	Reduction to boundary
Queen's Park	1986 & 1995	Queen's Park	Addition to boundary
Sudbury Cottages	1993	Northwick Park	De-designate
Willesden	1993	Willesden Green	Addition to boundary

- 3.8 On 8<sup>th</sup> January 2024, the Cabinet Member for Regeneration, Planning and Growth approved consultation on the review and the proposed changes to Brent's conservation areas.
- 3.9 The assessment and identification of conservation areas is informed by the use of detailed character appraisals. Conservation area character appraisals identify and describe which buildings and features contribute to the special architectural or historic interest of the designated area. They form background documents setting out the history and character, as well as the significance of the conservation area. Ultimately, they distinguish what makes an area 'special', meriting designation. They can also be used to determine if an area still justifies conservation status and thus if it should be rationalised or de-designated.
- 3.10 The character appraisals for the conservation areas under review (listed in the table at 3.7 of this report) can be viewed via weblinks in Appendix F. In addition to the assessment and significance of the conservation area and its boundary, these documents also contain the proposed boundary map. Furthermore, they explain what a conservation area is, what it means if your property is within a conservation area as well as an explanation and the use of Article 4 Directions. With the exception of the Harlesden Conservation Area, they will replace the existing conservation area appraisals.

### **Consultation and representations**

- 3.11 Consultation on the individual conservation area appraisals and their proposed boundaries was for six-weeks and involved 'drop-in' sessions at local Hubs/libraries.
- 3.12 The consultation responses, public engagement and representations received for each conservation area has informed the final recommendations for de-designation, extension to boundaries and designation. An overall summary of the results of the consultation survey can be seen at section 3.13 of this report. A full summary of the representations made on the consultation as well as an officer response may be viewed in Appendix G. Where appropriate,



representations related to each of the conservation areas are also set out in this report.

- 3.13 A total of 194 representations were received from local residents, residents' groups and statutory consultees. This was made up of 36 email and written responses, and 158 survey responses (approximately 80% of which came via the online survey).
- 3.14 The online survey disclosed that residents in Buck Lane and Northwick Circle areas for de-designation, that 26% were in favour and 36% against. For the new Kensal Rise and extensions to boundaries, 48% were in favour and 31% were against. For the de-designation of Sudbury Cottages, 10% were in favour and 9% against.

### **Summary of review of consultation results and recommendations for each conservation area**

- 3.15 The results of the consultation and representations received in relation to each area as well as advice from Historic England (a statutory consultee) together with a discussion follows. It ends with a recommendation for each conservation area.

#### **Brondesbury Conservation Area: extension to boundary**

- 3.16 A map in Appendix B shows the existing Brondesbury Conservation Area boundary, the proposed extension and the bordering areas which have been considered but have been dismissed.

#### *Discussion and results of consultation*

- 3.17 The results of the online survey, conversations at the drop-in sessions and the consultation reveal that residents in the proposed areas who commented on the proposals and statutory consultees are in full support of the extensions as recommended in the Brondesbury Conservation Area Character Appraisal, and any related efforts to preserve and protect the original architecture and character of these streets.
- 3.18 Historic England is content for the Council to designate the area as proposed. It agrees that the proposed extensions predominantly encompass decorative Victorian Villas which are of similar quality to those included within the existing conservation area boundary and as such are of similar heritage significance.

#### *Recommendation*

- 3.19 It is therefore recommended to extend the Brondesbury Conservation Area to include properties in Cavendish Road and Chatsworth Road as shown on the boundary map in Appendix B. This will also require an associated non-immediate Article 4 direction addressing the same permitted development rights as the current conservation area.

### **Buck Lane Conservation Area: reduction to boundary**

- 3.20 A map in Appendix C shows the existing Buck Lane Conservation Area boundary and the areas proposed to be removed from the current designation.

#### *Discussion and results of consultation*

- 3.21 The results of the online survey, conversations at the drop-in sessions and the consultation have determined that residents in Pear Close supported the reduction in the conservation area boundary. They felt that the houses on Pear Close have no significant architectural features and do not align to the original architect's quirky designs.
- 3.22 However, residents in Buck Lane and Hay Lane were opposed to the de-designation of their roads. Residents recognised that the houses were not as architecturally significant as the Trobridge properties, nevertheless, they felt that the ones in Buck Lane had attractive quoining detailing and provided a good grouping/backdrop to the conservation area. On Hay Lane they believed that the deep verdant front and back gardens contribute to the hillside setting of the conservation area.
- 3.23 Historic England supported the removal of buildings not attributed to the Trobridge and of noticeably less architectural merit. The approach is consistent with the NPPF requirement to ensure that conservation areas have sufficient merit to warrant designation.
- 3.24 Although the properties on Buck Lane and Hay Lane are not designed by Trobridge, they do provide a charismatic and sensible backdrop to the conservation area. It is also true that the potential loss of the verdant character and hillside setting provided by the gardens in Hay Lane could devalue the conservation area.

#### *Recommendation*

- 3.25 Given the resident feedback, it is only recommended to de-designate Pear Close as shown on the boundary map in Appendix C. The Council's Tree Officer will assess whether any of existing trees in Pear Close warrant a Tree Preservation Order (TPO) following de-designation. The current Article 4 Direction for the area will need to be removed.

### **Harlesden: extension to boundary**

- 3.26 A map in Appendix B shows the existing Harlesden Conservation Area boundary, the proposed extension and the areas which have been considered but have been dismissed.

#### *Discussion and results of consultation*

- 3.27 The results of the online survey, conversations at the drop-in sessions and the consultation have determined that property owners and residents who

commented on the consultation do not object to the proposed extensions to the Harlesden Conservation Area. The designation of this part of Harlesden will help bring improvements to the area and preserve local shops and business that make up the unique character of the area.

- 3.28 The Harlesden Neighbourhood Forum supports the extensions. It noted that the document was clear and provided useful summaries of the existing conservation area as well as details of the proposed extension.
- 3.29 Historic England supports the extensions because they reflect the scope of the recent High Street Heritage Action Zone, which recognised the historic interest and townscape quality of the wider area. It considers that the proposed extensions to the boundary will help safeguard the heritage significance of Harlesden town centre.

#### *Recommendation*

- 3.30 It is therefore recommended to extend the Harlesden Conservation Area to include the properties proposed in Craven Park Road, Manor Park Road and Park Parade as shown on the boundary map in Appendix B.

#### **Kensal Rise: proposed new conservation area**

- 3.31 A map in Appendix A shows the extent of the proposed Kensal Rise Conservation Area as well as other areas considered but dismissed as lacking in the same architectural and historic interest.

#### *Discussion and results of consultation*

- 3.32 The results of the online survey, conversations at the drop-in sessions and the consultation have determined that property owners and residents who commented on the proposals are generally in support of the proposed Kensal Rise Conservation Area. There was overall agreement that the late Victorian properties along Chamberlayne Road were the most attractive and unique for this area. Most pointed out that the area was worth preserving including Station Terrace, Clifford Gardens and the Church.
- 3.33 There was concern over restrictions and management particularly over roof extensions and renewable or low carbon installations. Although conservation area designation means some extra planning controls and considerations, these exist to protect the historic and architectural elements which make a place special and unique. Many alterations in a conservation area are permitted development such as PV panels and heat pumps or acceptable in planning terms if installed/extended in a certain way.
- 3.34 The Kensal Rise Residents' Association (KRRRA) supports the proposals. It argued that the buildings in question were not merely structures; they are important historical assets that contribute significantly to the cultural fabric of the Kensal Rise area and the wider Brent. It considers their preservation is vital in maintaining the heritage and character that defines the neighbourhood.

- 3.35 In addition to offering its support to the proposals, KRRA proposed that since these important assets are located within the Queen's Park Ward, which comprises Kensal Rise and Queen's Park, it would be fitting to house the Ward's conservation areas under one umbrella and rename it the Kensal Rise and Queen's Park Conservation Area', abbreviated 'KRQP Conservation Area'.
- 3.36 However, for several reasons, it is not recommended to amalgamate the two areas and rename them as the 'Kensal Rise and Queen's Park Conservation Area'. Kensal Rise is a distinct town centre which is predominantly commercial and retail in character with a distinctly different architectural style to the residential terraces and character of Queen's Park. It would become quite a large conservation area to manage with different planning management policy.
- 3.37 Historic England supports the new Kensal Rise Conservation Area. It considers that there is clear justification for the proposed designation of the conservation area, pointing out that the townscape is a surprisingly complete collection of Victorian/Edwardian buildings and the summary report sets out a strong case for designation as a conservation area.

*Recommendation*

- 3.38 It is recommended to designate the Kensal Rise Conservation Area to include the properties proposed on the boundary map in Appendix A. This will also require an associated Article 4 direction addressing the same permitted development rights as applies in the Queen's Park conservation area.

**Mapesbury: extension to boundary**

- 3.39 The map in Appendix B shows the existing Mapesbury Conservation Area boundary, the proposed extension and the areas which have been considered but have been dismissed.

*Discussion and results of consultation*

- 3.40 The results of the online survey, conversations at the drop-in sessions and the consultation reveal that the residents in the proposed new areas who commented on the proposals and statutory consultees are in full support of the extensions as recommended in the Mapesbury Conservation Area Character Appraisal.
- 3.41 Residents were generally in support agreeing that the façades of the commercial blocks and the trees outside are important to the character of the area and should be protected.
- 3.42 Historic England supported the proposals as they would incorporate properties of similar scale and appearance to the existing conservation area.

*Recommendation*

- 3.43 It is recommended to extend the conservation area to include properties in Chichele Road, Sheldon Road and Cricklewood Broadway as shown on the boundary map in Appendix B. This will also require an associated Article 4 direction for the properties not on Cricklewood Broadway (which are commercial) addressing the same residential permitted development rights as the current conservation area.

#### **Northwick Circle: reduction to boundary**

- 3.44 A map in Appendix D shows the existing Northwick Circle Conservation Area boundary and the areas which under the consultation, were proposed to be de-designated.

#### *Discussion and results of consultation*

- 3.45 The results of the online survey, conversations at the drop-in sessions and the consultation reveal that most residents who commented on the proposals were not in favour of the reduction. Many felt that even with unsympathetic modifications, there remains a core of architecturally coherent streets. Some of the houses still have much character and together with the trees in the conservation area provide coherent whole worthy of protection from demolition, large extensions and redevelopment.
- 3.46 First suggested at the drop-in sessions, an alternative solution could be reached whereby certain Article 4 Directions (for windows, doors and works to front gardens) be removed for those parts of the conservation area that were proposed to be taken out, but the conservation area boundary (as designated) remains. This suggestion was followed up by individual requests on the online survey and a petition signed by 56 residents from Briar Road, Draycott Avenue, Greystone Gardens, Lapstone Gardens and Winchfield Close.
- 3.47 The Northwick Park Residents Association endorsed the alternative which it considered would maintain the thematic integrity of the area while allowing for some relaxation in certain Article 4 Directions to facilitate easier management and garner resident co-operation.
- 3.48 Historic England supported the de-designation noting that some of the properties are relatively common 1930s suburban designs better illustrated in other conservation areas. It also noted that the erosion of historic features illustrates the need for positive management and clear policies in respect of conservation areas.

#### *Recommendation*

- 3.49 After careful consideration, it is recommended to retain the existing Northwick Circle Conservation Area (as designated) and as shown on the boundary map in Appendix D but remove the Article 4 Directions for front doors, windows and works to front gardens for parts of the conservation area that were previously considered would be appropriate for removal in the Draft Character Appraisal.

### **Queen's Park: extension to boundary**

- 3.50 The map in Appendix B shows the existing Queen's Park Conservation Area boundary, the proposed extension and the areas which have been considered but have been dismissed.

#### *Discussion and results of consultation*

- 3.51 The results of the online survey, conversations at the drop-in sessions and the consultation reveal that most residents who commented on the proposals were in favour of the extension. They particularly welcomed the inclusion of Lonsdale and Salusbury Roads.
- 3.52 In addition, there was much support for an extension to the Queen's Park Conservation Area to cover Wrentham Avenue, Dundonald Road, Crediton Road and Okehampton Road. However, as argued in the Character Appraisal, the properties have been found to be too altered for extension to the Queen's Park Conservation Area and there would be concern that this would weaken its special interest. For example, over half the properties on Dundonald Road have full-width rear dormers (some of which extend onto the outrigger). Crediton Road is much the same. Wrentham Avenue fairs better for rear dormers but over half the front gardens have been lost for the parking of cars.
- 3.53 Queen's Park Area Residents' Association (QPARA) overwhelmingly support the revised boundaries set out in the consultation document. There was general appreciation of the work presented in the consultation document and the general thrust of the proposals. It also supported the relocation of Honiton and Lynton Roads from the Kilburn Conservation Area to the Queen's Park Conservation Area. QPARA agreed that Hartland Road, the western end of Victoria Road and Brondesbury Road should not be included.
- 3.54 Historic England supports the proposals. It agreed with the inclusion of Salusbury Road and commercial high street because they include attractive terraces, commercial and institutional buildings which contribute positively to the character and appearance and enhance the significance of the existing conservation area. There was full support for Lonsdale Road given the unusual survival of smaller scale terraces and workshops.

#### *Recommendation*

- 3.55 It is recommended to extend the conservation area to include properties in Chevening Road, Lonsdale Road, Salusbury Road and Winchester Road as shown on the boundary map in Appendix B. It is also recommended to include the properties in Honiton Road, Lynton Road and Donaldson Road as shown on the boundary map in Appendix B. This will also require an associated Article 4 direction addressing the same permitted development rights as the current conservation area (excluding the parts transferred from Kilburn where the existing Article 4 will remain effective).

### **Sudbury Cottages: de-designate**

- 3.56 The boundary map in Appendix C shows the extent of the Sudbury Cottages Conservation Area which it is proposed to de-designate.

*Discussion and results of consultation*

- 3.57 The results of the online survey, conversations at the drop-in sessions and the consultation reveal that most residents who commented on the proposals were in favour of de-designating the Sudbury Cottages Conservation Area. They were also in support of ensuring that the old cottages were protected from demolition and that trees were maintained in the area. However, it should be noted that all the important trees are already protected by Tree Preservation Orders (TPOs).
- 3.58 Historic England supported the de-designation. It pointed out that Character Appraisal illustrates that there is little rural character remaining in the area (the extent to which this could be considered to be identifiable at the time of designation is in itself noted as questionable). In its view, the remaining interest of the area is best illustrated by local designations and the Tier 2 Archaeological Priority Area.

*Recommendation*

- 3.59 De-designation is recommended for the Sudbury Cottages Conservation Area as shown on the boundary map in Appendix C. Protection over demolition and alteration on the architecturally and historically significant cottages (which are locally listed) will remain by the use of immediate Article 4 Directions. The Article 4 direction that is no longer relevant will also need to be removed.

**Willesden Green: extension to boundary**

- 3.60 The map in Appendix B shows the existing Willesden Green Conservation Area boundary, the proposed extension and the areas which have been considered but have been dismissed.

*Discussion and results of consultation*

- 3.61 The results of the online survey, conversations at the drop-in sessions and the consultation reveal a divided response from residents who commented on the proposals for the proposed extensions to the conservation area. There was much support, mainly from residents within Dean Road, who felt the area had a rich heritage with many buildings of architectural interest. However, others, mainly from Brondesbury Park, suggest that the designation will make no difference as many of the properties have not preserved the original Victorian appearance. They were concerned that this will create further issues for residents and landlords. They were also concerned about the additional cost burdens that a conservation area imposes, for example, the requirement for planning permission to change windows or to construct an outbuilding. Nevertheless, at a drop-in session, there was discussion around the inclusion of 126 to 148 Brondesbury Park because these properties were similar in

architectural style to those recommended for inclusion alongside and just as well preserved.

- 3.62 The character appraisal which informed the proposed extensions to Willesden Green looked at the surrounding streets and has only recommended inclusion of those properties which clearly demonstrate that they have special architectural and/or historic interest. It is clear that the properties in Brondesbury Park have architectural significance, the character and appearance of which it is desirable to preserve or enhance. Furthermore, the properties identified at the drop-in session are obviously as architecturally important and significant but were missed in the initial assessments.
- 3.63 Whilst it is acknowledged that conservation area status will lead to additional restrictions for properties within the area, this does not preclude development in-principle (particularly where it can be demonstrated that it will not cause harm). It will give heightened protection to the identified architectural and/or historic interest of these areas and will allow careful improvements to be made. It will also attract investment into the historic housing stock.
- 3.64 Historic England supports the conservation area extensions. It agreed that the proposed extensions encompass attractive, decorative, late Victorian housing and mansion blocks of similar quality to those already identified within Willesden and its neighbouring conservation areas. As such, the proposals appear justified and will enhance the existing character and appearance of the conservation area.

#### *Recommendation*

- 3.65 Designation is recommended for the extensions to the Willesden Green Conservation Area, particularly for Dean Road, Brondesbury Park, Staverton Road and Rutland Park and as shown on the boundary map in Appendix B. Consultation is also recommended on a further extension to the Willesden Green Conservation Area boundary to include 126 to 148 Brondesbury Park and delegate the decision on whether to confirm to the Corporate Director of Neighbourhoods and Regeneration.

#### **Conclusion**

- 3.66 The conservation area review has been subject to extensive consultation and representations received have been fully considered. Consultation and engagement is an integral part of the process of managing conservation areas.
- 3.67 The consultation exercise showed significant support for the designation of the Kensal Rise Conservation Area. It also showed support for extensions to the Brondesbury, Harlesden, Mapesbury, and Queen's Park Conservation Areas. In Willesden Green there was less support for the properties in Brondesbury Park to be included.
- 3.68 Furthermore, the consultation exercise showed significant support for the de-designation of the Sudbury Cottages Conservation Area and a reduction in the



boundary for the Buck Lane Conservation Area (Pear Close). Residents wished to keep the status for the Northwick Circle Conservation Area but relax a number of Article 4 restrictions to the front of the properties in the roads surrounding the circle.

### **Areas of Distinctive Residential Character - amendments**

- 3.69 The adopted Brent Local Plan Policies Map currently includes a number of Areas of Distinctive Residential Character. These cover parts of the borough that were identified in Brent's Historic Environment Placemaking Strategy, May 2019 as having the potential for conservation area status, prior to a fuller formal analysis and consultation consistent with statutory requirements. This was to afford them some potential additional protection in advance of review of that potential. As a result of the review of conservation areas set out in this report for some parts of the borough these now need to be removed from the policies map as a factual update. Some parts will be replaced by conservation area status, others which have been considered as part of the conservation area appraisals, but discounted will need to be removed. This will provide clarity on their status, retaining areas considered not worthy of conservation area status could create unrealistically high levels of protection that the Council could afford them, and also divert heritage officer time from assets of a greater significance.

### **Next steps**

- 3.70 Following designation and de-designation of the conservation areas, and as required by the Planning (Listed Buildings and Conservation Areas) Act 1990, a notice will be placed in the London Gazette for each conservation area and in two local newspapers. The Secretary of State and Historic England will need to be informed of the designation and de-designations. The Council has also to register the designations as a land charge.
- 3.71 There is no formal duty under the Act to notify current owners or occupiers individually, but letters will be sent to all those that were subject of the consultation. Further consultation will be required on the Article 4 Directions (minimum of 6 weeks) and as appropriate. Consideration of responses and whether to confirm the Article 4s if uncontroversial can be delegated decision by the Corporate Director, Neighbourhoods and Regeneration.
- 3.72 The new character appraisals will replace the existing character appraisals apart from Harlesden where it will be necessary for two to be retained. The Council's website will be updated to explain the results of the consultation and the new boundaries. It will also be updated with further planning guidance.

### **Options**

- 3.73 There are various options open to the Council:
- a) Commence the amendments to the conservation areas with associated changes to the related Article 4 Directions, taking account of consultation, as recommended in this report.

- b) Do not make the amendments to the conservation areas with associated changes to the related Article 4 Directions, taking account of the consultation.
- c) Amend the conservation area boundaries, but do not undertake the Article 4 Directions.
- d) Amend the conservation area boundaries, with associated changes to the related Article 4 Directions, but do not take into account the owner's views on the Northwick Circle Conservation Area and those relating to Buck Lane.

3.74 The Council is duty-bound to review existing conservation area boundaries and the potential for new conservation areas. Where such areas are identified that meet the criteria to be within a conservation area, it is a statutory requirement under Section 69(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which directs local planning authorities to review their conservation areas from time to time.

3.75 The Council assessed the new conservation area in Kensal Rise and the extensions to the boundaries as well as the recommended de-designations against selection criteria that were recommended by Historic England. This was following recommendations in the Historic Environment Placemaking Strategy 2019. The proposals have the support of Historic England and the boundaries drawn-up in consultation with local residents' associations.

3.76 Not designating the Kensal Rise Conservation Area and extending the other boundaries will mean the Council will be neglecting its statutory duty. There is also a risk that currently well preserved areas of the Borough could be compromised through development that does not require planning permission. Likewise, not placing the appropriate Article 4 Directions in these areas will likely mean a dilution of architectural significance as well as the reason for designation.

3.77 In consulting owners and residents on new designations, and when appraising and reviewing conservation area boundaries, consideration can be given to relevant information that either might present, helping to ensure decisions are robust. Owners and residents are also helpful in providing proactive assistance in identifying the general areas that merit conservation area status (or not) and defining the boundaries. They can therefore add depth and a new perspective to the local authority view.

#### **4.0 Stakeholder and ward member consultation and engagement**

4.1 Consultation and engagement is an integral part of the process of managing conservation areas. It is a statutory duty under Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to publish proposals for the preservation and enhancement of conservation areas and consult the public in the area in question.

- 4.2 Consultation was undertaken in accordance with the Council's Statement of Community Involvement (SCI) and included a minimum six-week period; placing notices in prominent locations within the areas (at least one on each affected street); writing to each property in the area notifying them of the consultation, how to make representations and the deadline for these and undertaking 'drop-in' sessions at the relevant local Hub/library.
- 4.3 The consultation was also advertised on the Council's website and notifications sent to relevant Residents' Association's, statutory consultees and those on the Local Plan consultation list. The documents were made available in Brent Council libraries.
- 4.4 Ward members were notified directly of the proposals and notified via the Members' Information Bulletin. Some ward Councillors have been directly involved in discussions with residents and resident's associations.

## **5.0 Financial Considerations**

- 5.1 The designation of the new and amended conservation areas will be undertaken using existing budget and resources within the Service.

## **6.0 Legal Considerations**

- 6.1 The Council has the legal powers for this course of action. Section 69(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on local planning authorities from time to time to determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and to designate those areas as conservation areas.
- 6.2 Section 69(2) places a duty on local planning authorities from time to time to review the past exercise of functions under this section and to determine whether any parts or further parts of their area should be designated as conservation areas, and if they so determine, to designate those parts accordingly. The present proposals arise out of this duty.
- 6.3 Whilst the Council's decision to carry out the review in accordance with Section 69(2) is unlikely to be challenged, should the Cabinet approve amendments to the respective conservation areas with associated Article 4 directions, those aggrieved could decide to challenge the decision(s) to amend the conservation areas by way of judicial review within 6 weeks of the respective decisions.

## **7.0 Equity, Diversity & Inclusion (EDI) Considerations**

- 7.1 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.

7.2 There are no detrimental impact to groups with protected characteristics under the Equality Act 2010. There are no health equalities implications.

## **8.0 Climate Change and Environmental Considerations**

8.1 Conservation area designation does not prevent property owners from improving the energy efficiency of their homes or contributing towards net zero. The energy and carbon performance of most historic buildings can be improved, which will help them remain sustainable in the future. Successful retrofitting takes into account the construction of the building and ensures the aesthetic character is maintained. There is no reason why historic buildings in conservation areas cannot be powered by renewable sources and be resilient to future adverse weather events caused by climate change.

8.2 Conservation area policy within Brent's Local Plan promotes reuse, adaption and sustainability as well as protecting the natural environment, and as a result, reduces emissions from building and construction. Heritage policies prevent significant buildings from being demolished and the felling of trees, but it is widely recognised that total demolition uses more carbon than the retention, renovation and retrofitting. This is supported by Brent's Climate Emergency Strategy 2021-2030 which advocates the need to reduce emissions from building and construction both the operational emissions and the embodied carbon. It is important if Brent is to meet its target of being net zero carbon by 2030. It is also worth remembering that many works of retrofitting to improve energy efficiency and reducing carbon emissions are permitted development in conservation areas and therefore do not require planning permission.

## **9.0 Communication Considerations**

9.1 People generally like conservation areas and are supportive of their designation. However, there are a minority of residents who do not support the proposed extensions and new designations. It must be remembered that the Council has a duty under the Planning (Listed Buildings and Conservation Areas) Act 1990, to determine and review which parts of their area are of special architectural or historical interest, the character or appearance of which it is desirable to preserve or enhance, and to designate such areas as conservation areas. The proposed designations have been assessed through character appraisals and are supported and advocated by the local resident associations as well as being endorsed by Historic England.

9.2 The designation of a conservation area does not mean every building will be preserved and no changes allowed. Many alterations are permitted

development such as PV panels and heat pumps or acceptable in planning terms if installed/extended in a certain way. It is a key element of enhancing the overall quality of the built environment in Brent. As with design review, it helps raise standards in new developments and placemaking which often make reference to the existing when setting the rationale for the design of their developments. Designation helps ensure changes respect the area's character and appearance. Such areas are also often the best in conserving ecosystems, biodiversity and halting climate change.

- 9.3 There are residents who want other areas designated. While there are lots of streets that display some level of architectural or historic interest, we must be mindful of paragraph 197 of the NPPF which states that 'local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest'.

**Report sign off:**

**Alice Lester**

Corporate Director of Neighbourhoods and  
Regeneration

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# Conservation area map appendices

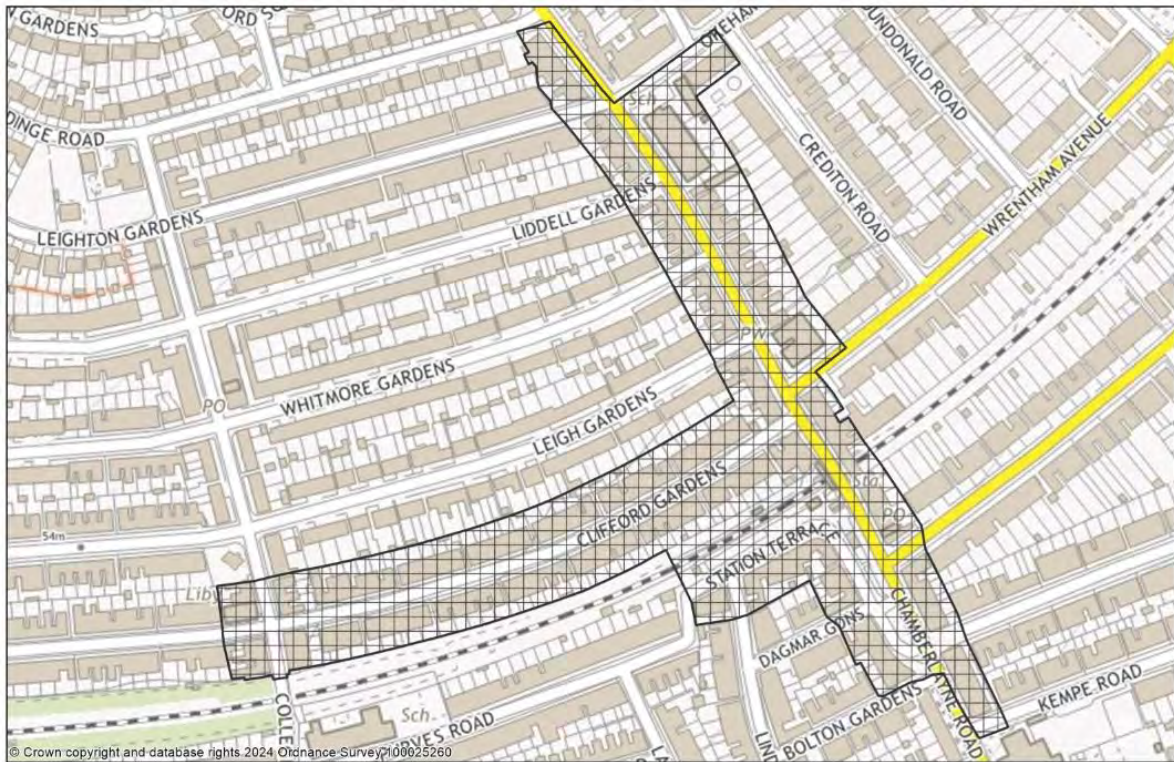
## Contents

<b>Appendix A: New Conservation Area</b> .....	2
Kensal Rise: new conservation area map .....	2
Kensal Rise proposed conservation area: areas considered for modification .....	2
<b>Appendix B: Conservation Area Extensions</b> .....	3
Mapesbury Conservation Area: new boundary map .....	3
Mapesbury Conservation Area: areas considered for modification .....	3
Brondesbury Conservation Area: new boundary map.....	4
Brondesbury Conservation Area: areas considered for modification .....	4
Willesden Green Conservation Area: new boundary map.....	5
Willesden Green Conservation Area: areas considered for modification .....	5
Harlesden Conservation Area: proposed new boundary map.....	6
Harlesden Conservation Area: areas of extension .....	7
Queen’s Park Conservation Area: new boundary map .....	8
Queen’s Park Conservation Area: areas considered for modification.....	8
<b>Appendix C: Conservation Area reductions</b> .....	9
Buck Lane Conservation Area: proposed boundary map.....	9
Buck Lane Conservation Area: areas considered for modification .....	10
Buck Lane areas being taken forward for removal from conservation area .....	11
Sudbury Cottages Conservation Area: de-designation map .....	12
.....	12
<b>Appendix D: Article 4 Direction Removals</b> .....	13
Northwick Circle Conservation Area: areas where the Article 4 Direction will be relaxed .....	13
Sudbury Cottages Conservation Area: properties to be removed from existing article 4 direction and where new Article 4 Directions will be made .....	14
<b>Appendix E: New areas to be covered by Article 4 Directions</b> .....	15
Mapesbury Conservation Area: proposed Article 4 Directions.....	15
Brondesbury Conservation Area: proposed Article 4 Directions .....	16
Willesden Green Conservation Area: proposed Article 4 Directions .....	17
Queen’s Park Conservation Area: proposed Article 4 Directions.....	18
Kensal Rise Conservation Area: proposed Article 4 Directions .....	19



# Appendix A: New Conservation Area

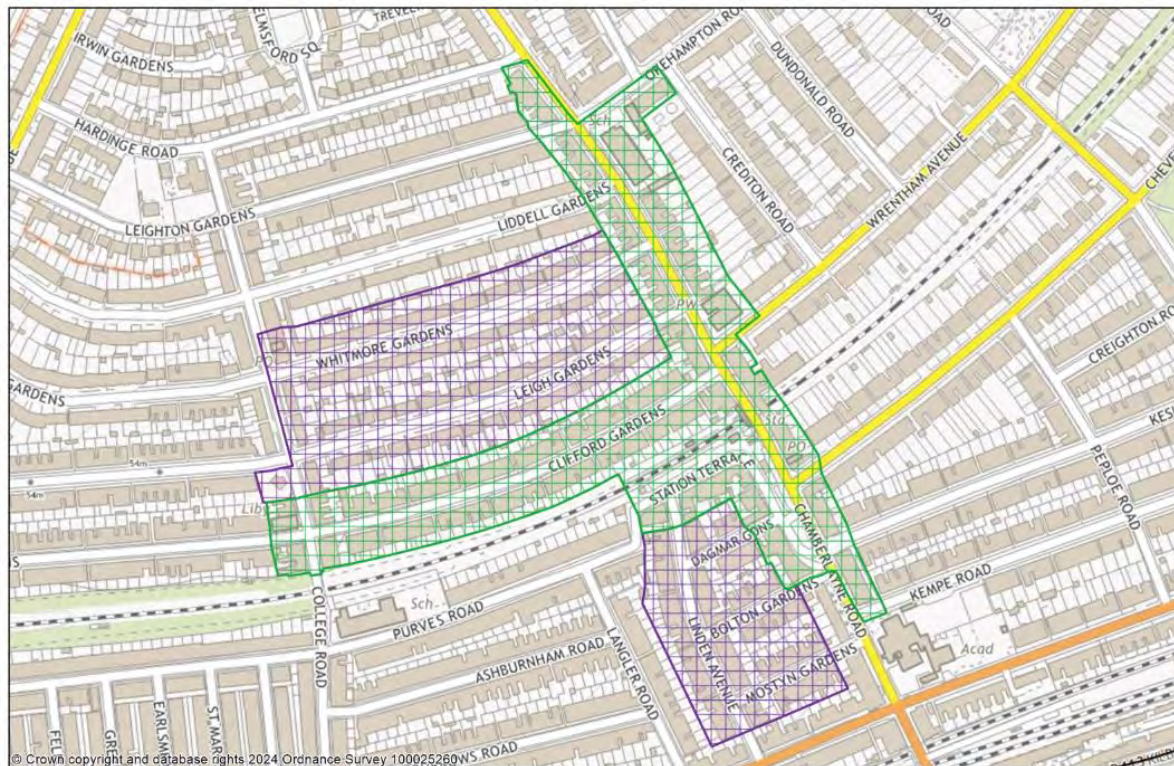
## Kensal Rise: new conservation area map



1:3500 26 April 2024 0 0.05 0.1 kilometres © Crown copyright and database rights 2024 Ordnance Survey 100025260

## Kensal Rise proposed conservation area: areas considered for modification

(key: green=proposed conservation area; purple=area considered but dismissed)

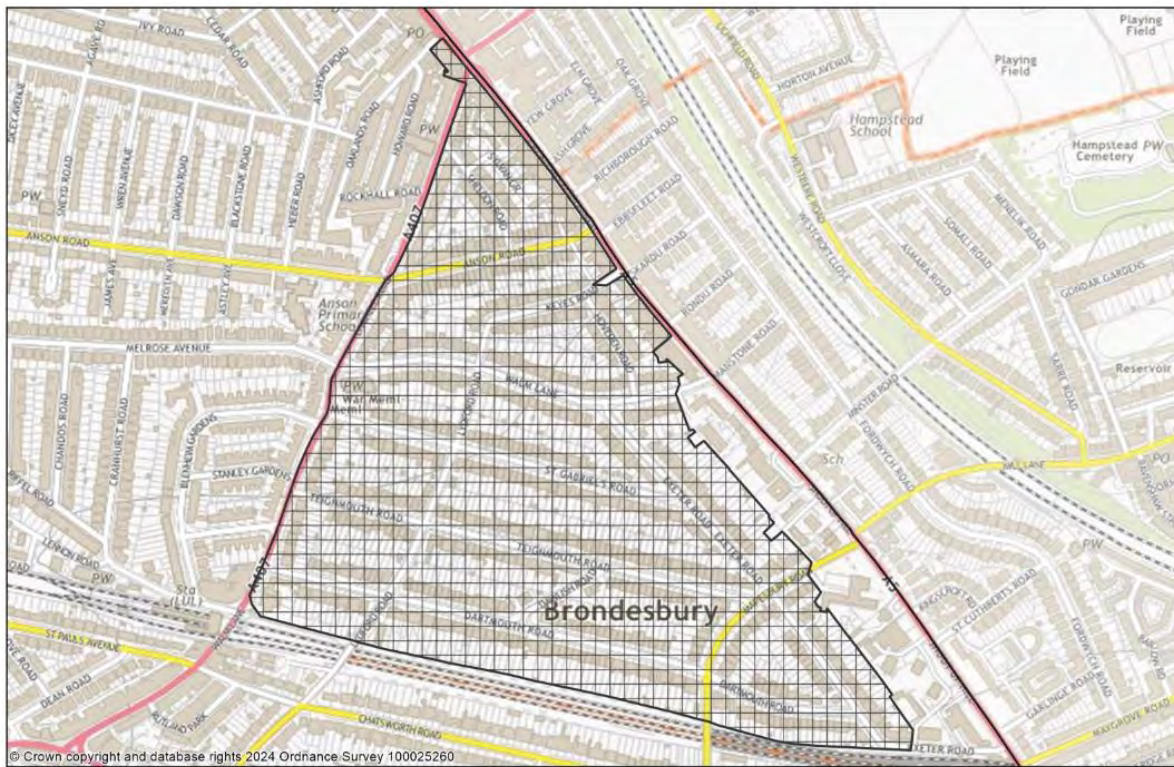


1:4500 07 May 2024 0 0.05 0.1 kilometres © Crown copyright and database rights 2024 Ordnance Survey 100025260



# Appendix B: Conservation Area Extensions

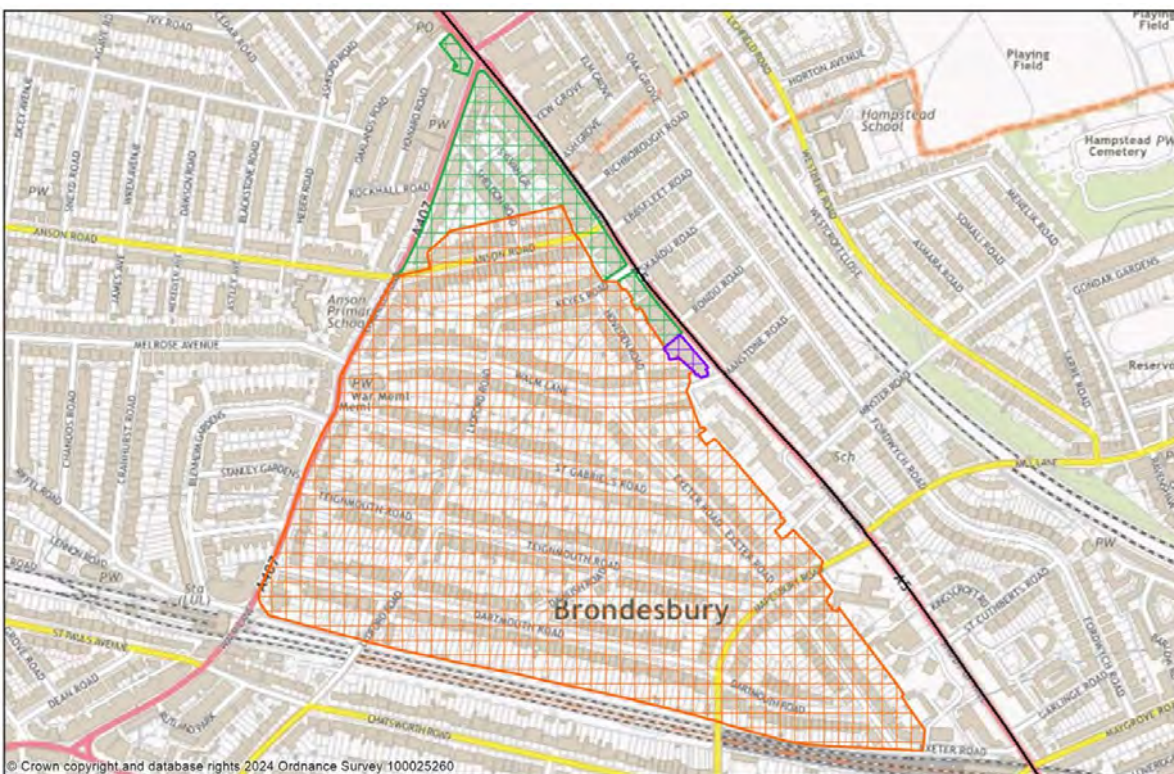
## Mapesbury Conservation Area: new boundary map



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## Mapesbury Conservation Area: areas considered for modification

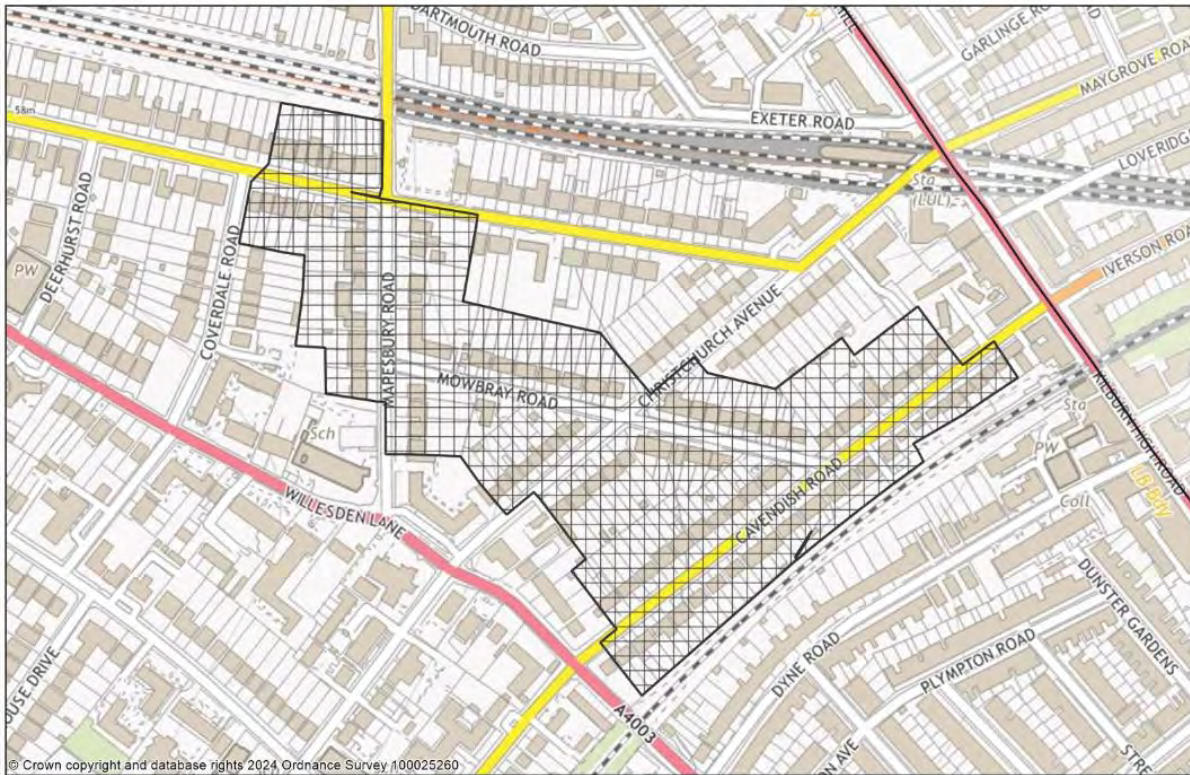
(key: orange=existing; green=proposed extension; purple=area considered but dismissed)



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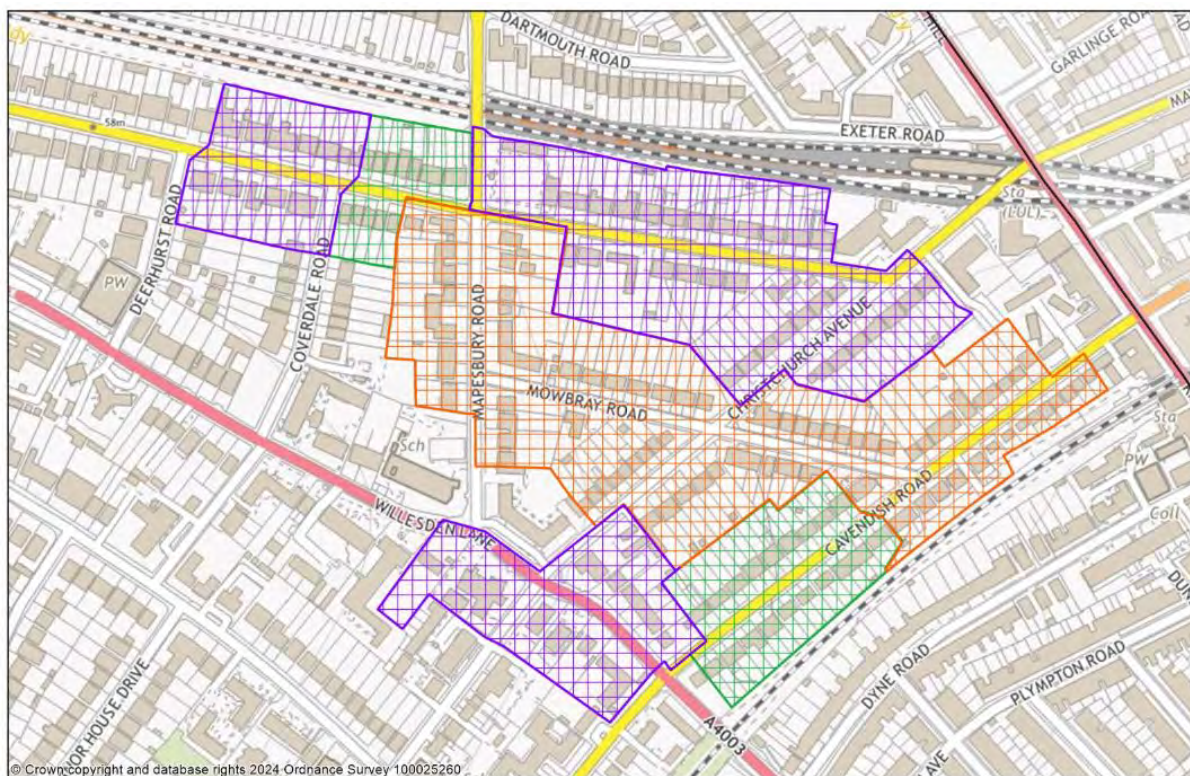
# Brondesbury Conservation Area: new boundary map



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# Brondesbury Conservation Area: areas considered for modification

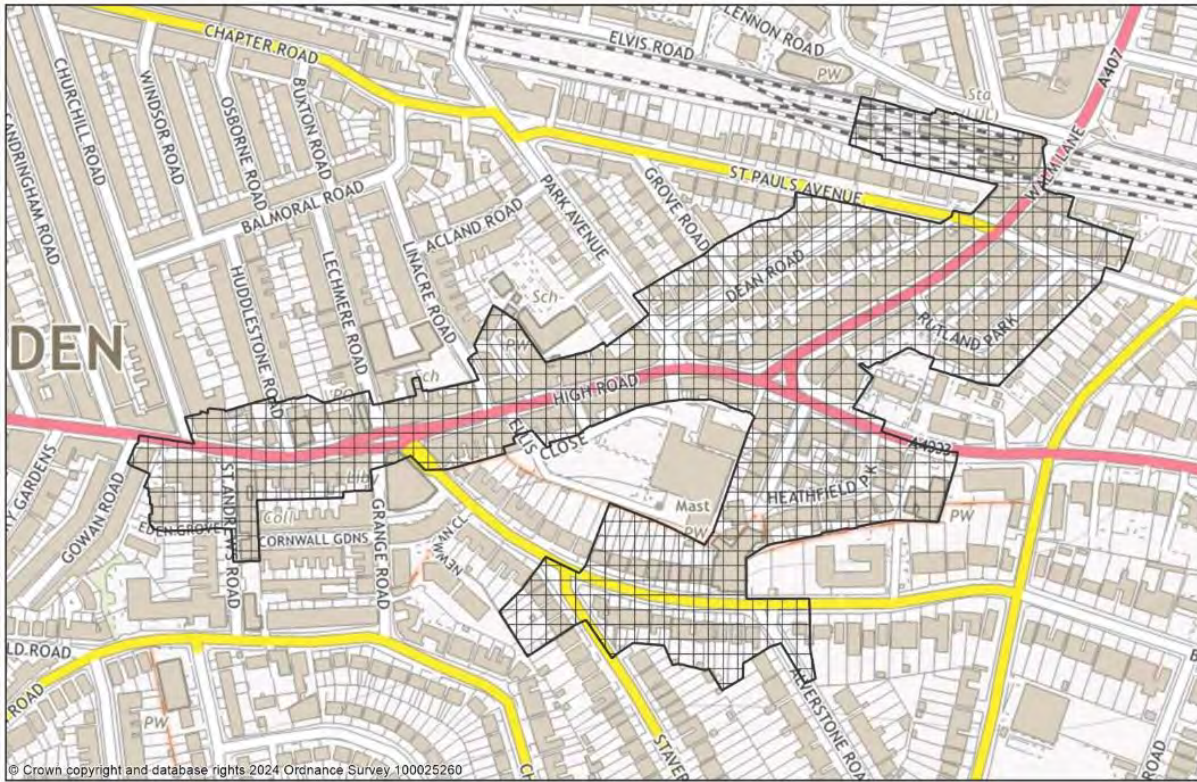
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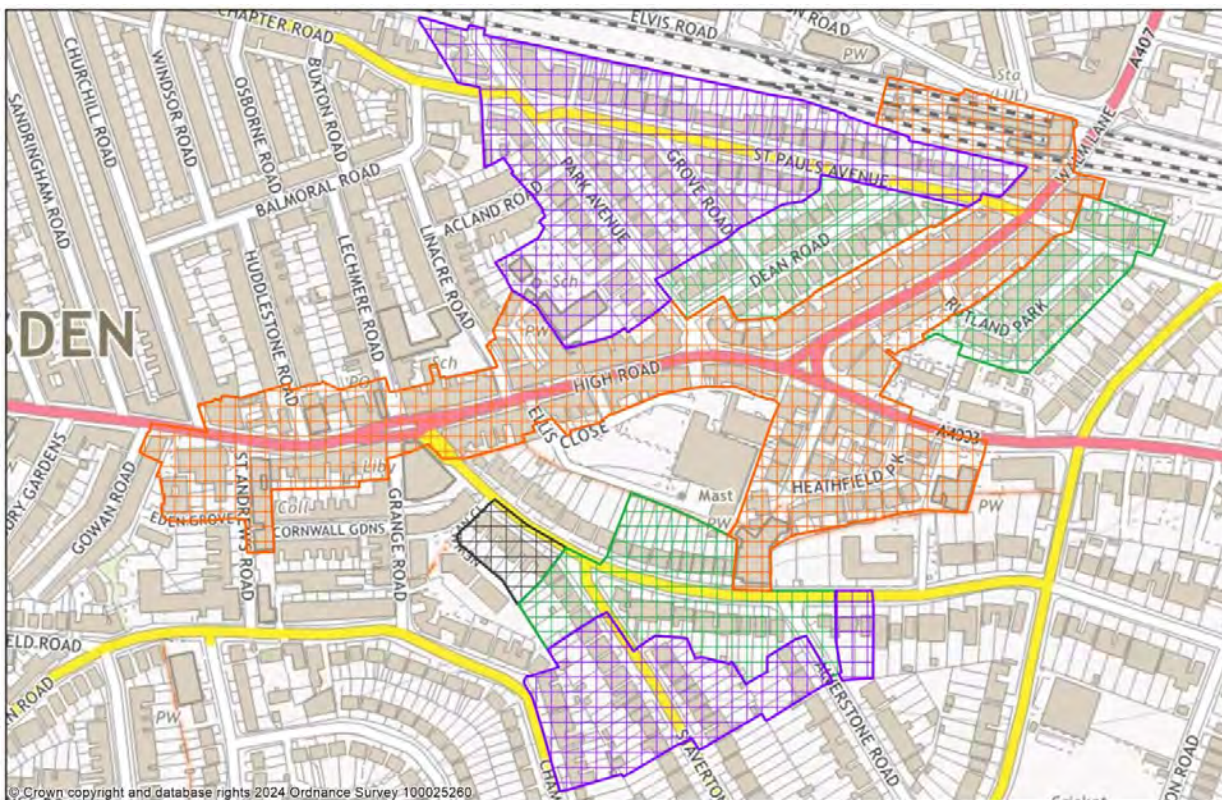
## Willesden Green Conservation Area: new boundary map



1:4000 26 April 2024 0 0.05 0.1 kilometres 

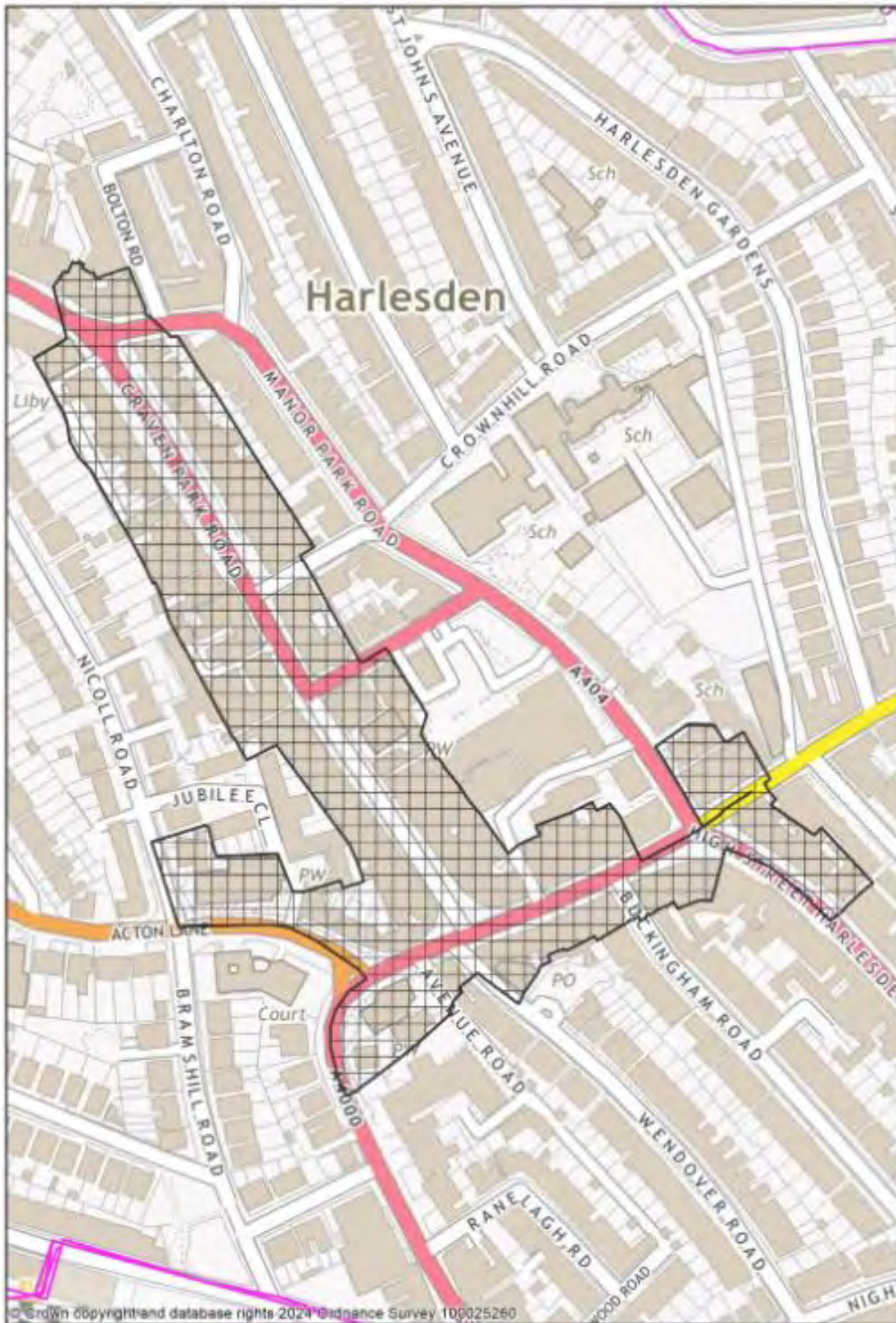
## Willesden Green Conservation Area: areas considered for modification

(key: orange=existing; green=proposed extension; purple=area considered but dismissed; black=subject to additional consultation)



1:4000 08 May 2024 0 0.05 0.1 kilometres 

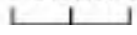




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1:3000

0 0.025 0.05 kilometres





Harlesden Conservation Area: areas of extension

(key: orange=existing; green=proposed extension)



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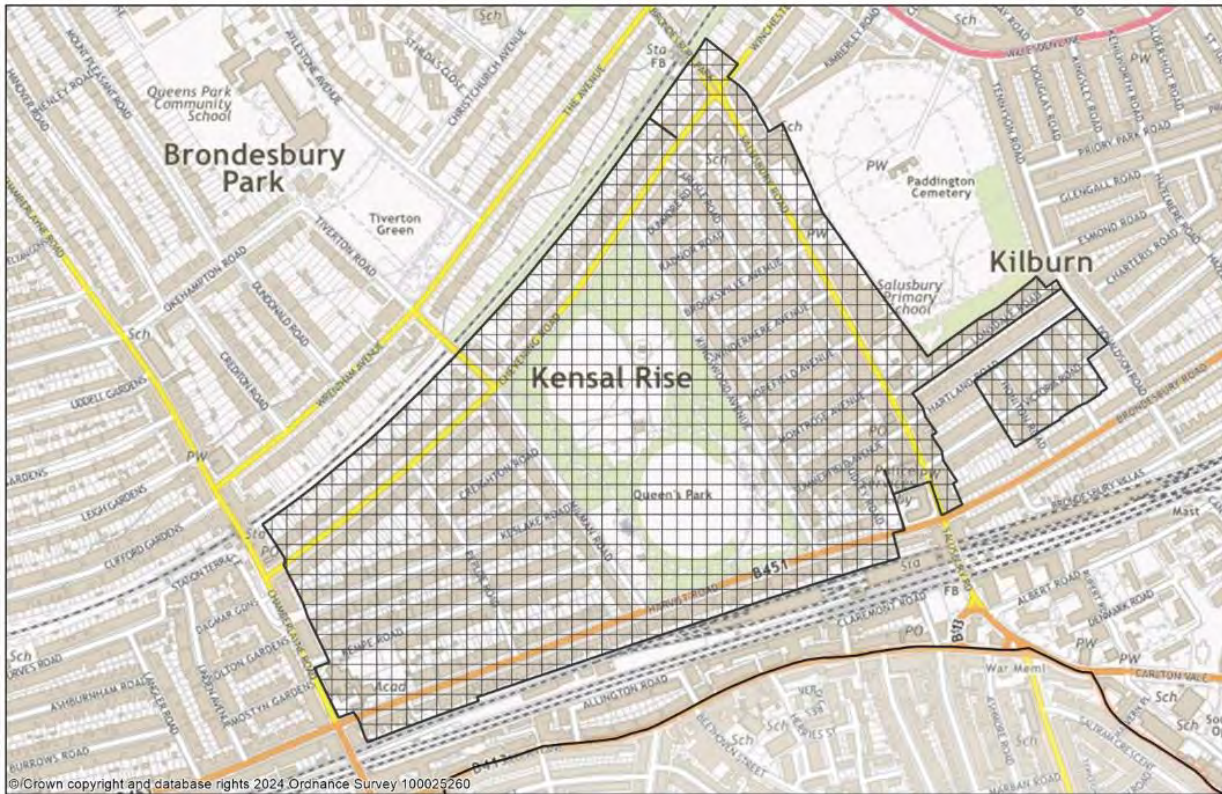
1:3000

0 0.025 0.05 kilometres





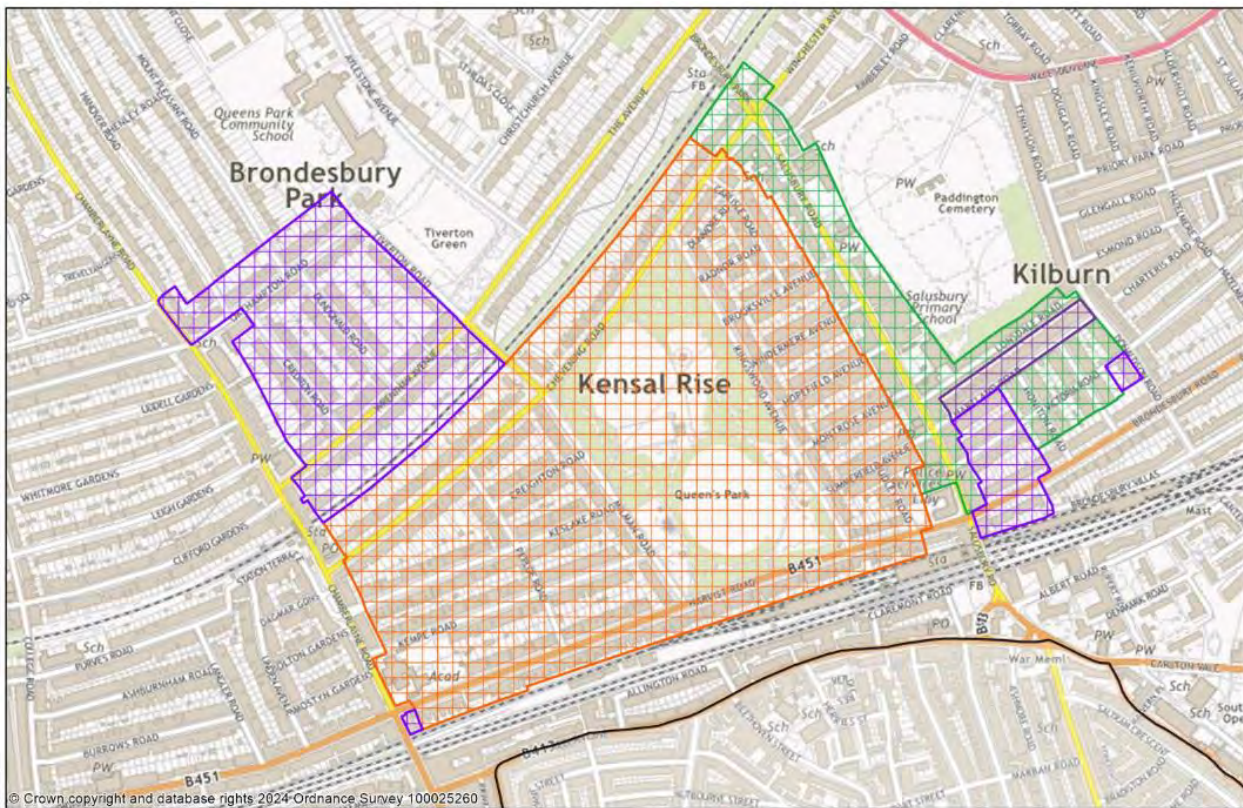
Queen's Park Conservation Area: new boundary map



1:7000 26 April 2024 0 0.1 0.2 kilometres

Queen's Park Conservation Area: areas considered for modification

(key: orange=existing; green=proposed extension; purple=area considered but dismissed)

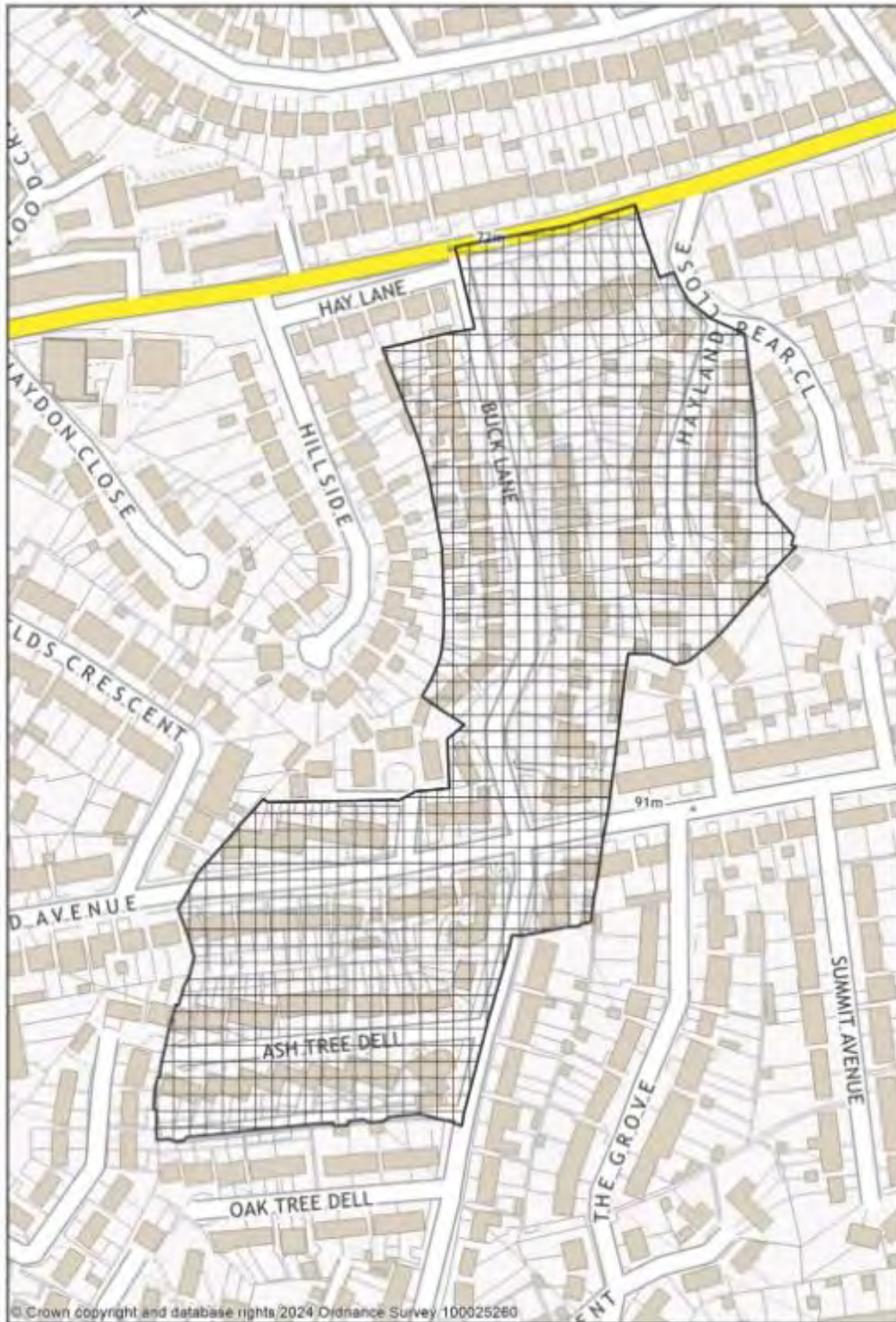


1:7500 07 May 2024 0 0.1 0.2 kilometres



# Appendix C: Conservation Area reductions

Buck Lane Conservation Area: proposed boundary map



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1:2500

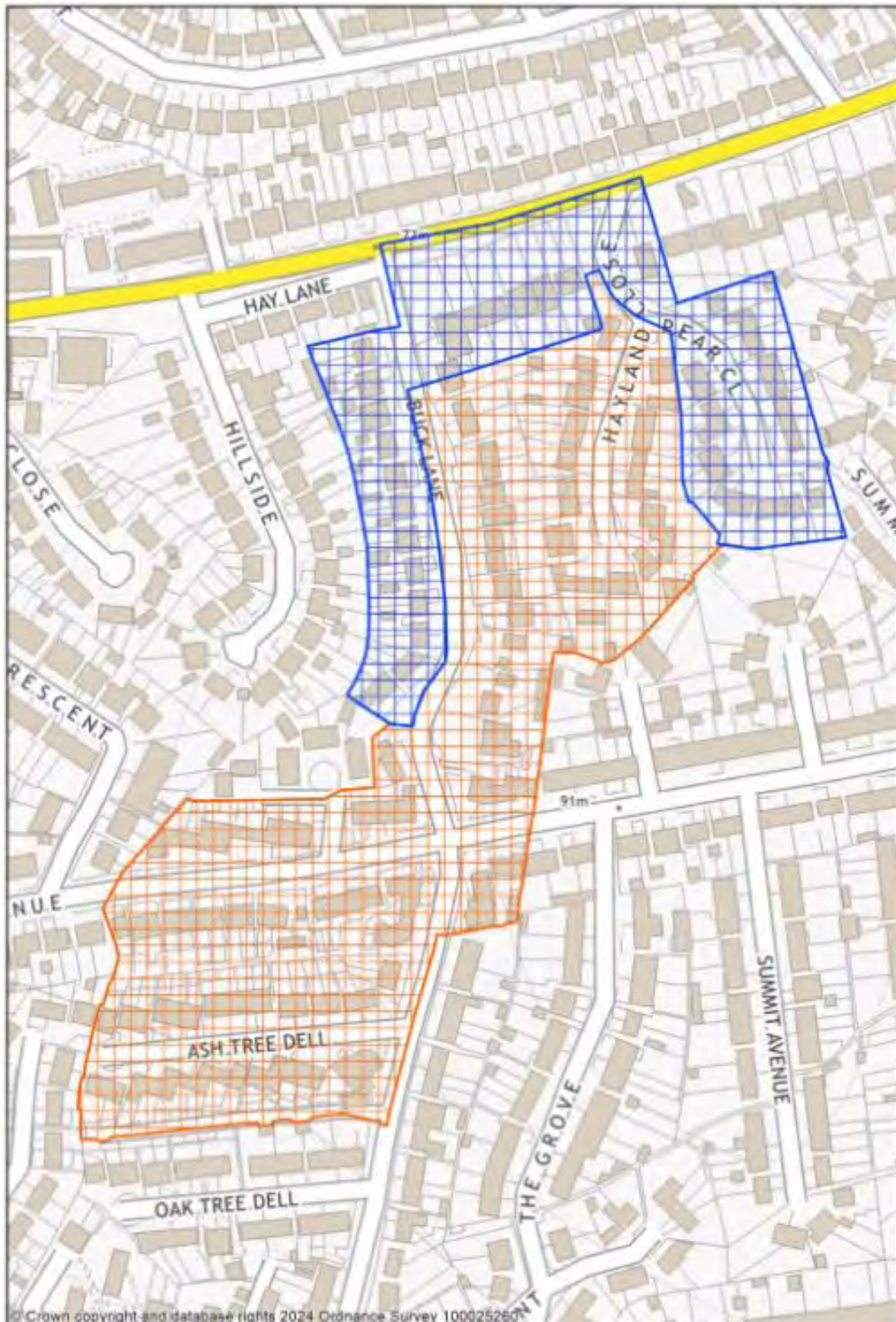
0 0.025 0.05 kilometres





Buck Lane Conservation Area: areas considered for modification

(key: orange=existing; blue=considered for removal)



1:2500

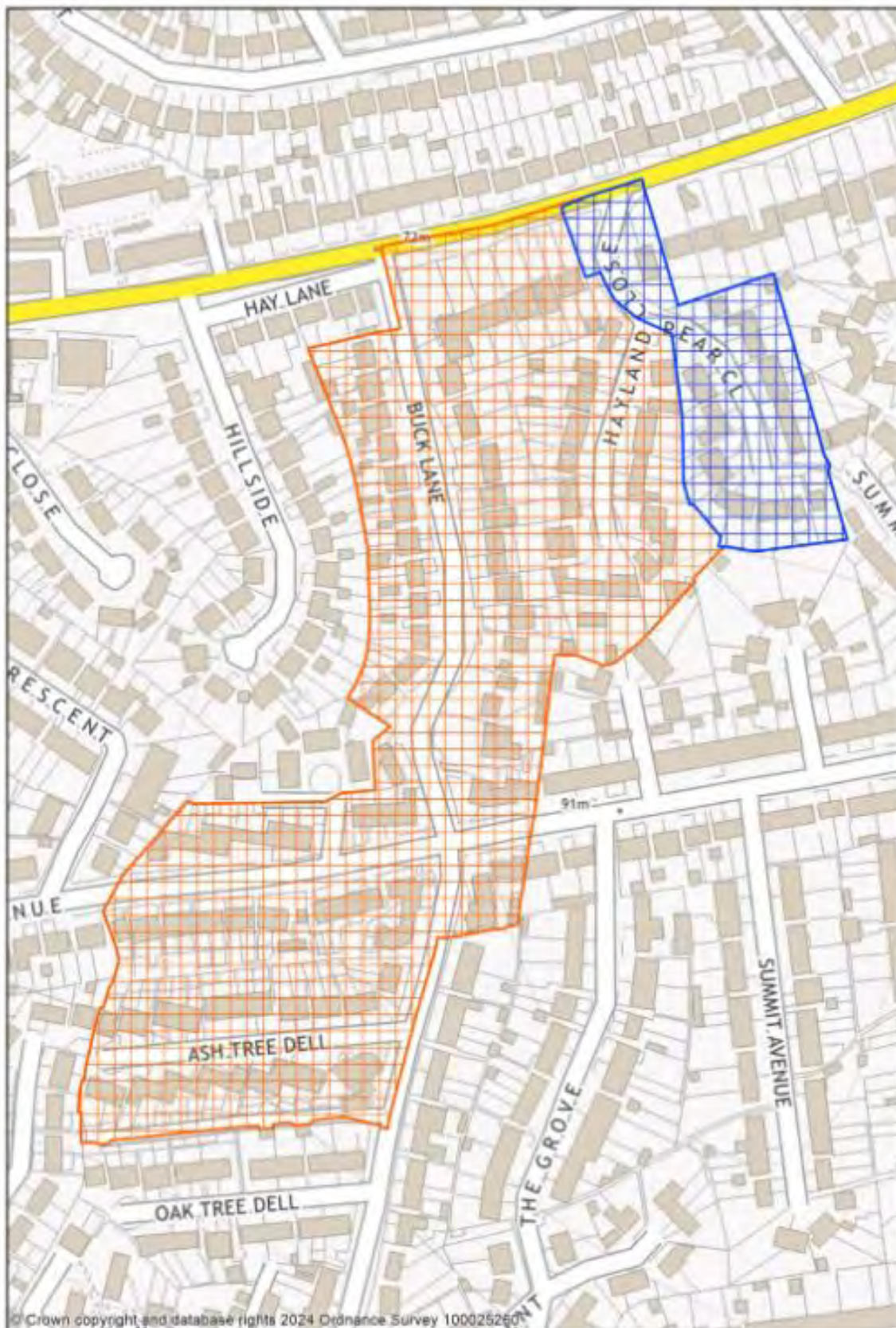
0 0.025 0.05 kilometres





Buck Lane areas being taken forward for removal from conservation area

(key: orange=existing; blue=area to be removed)

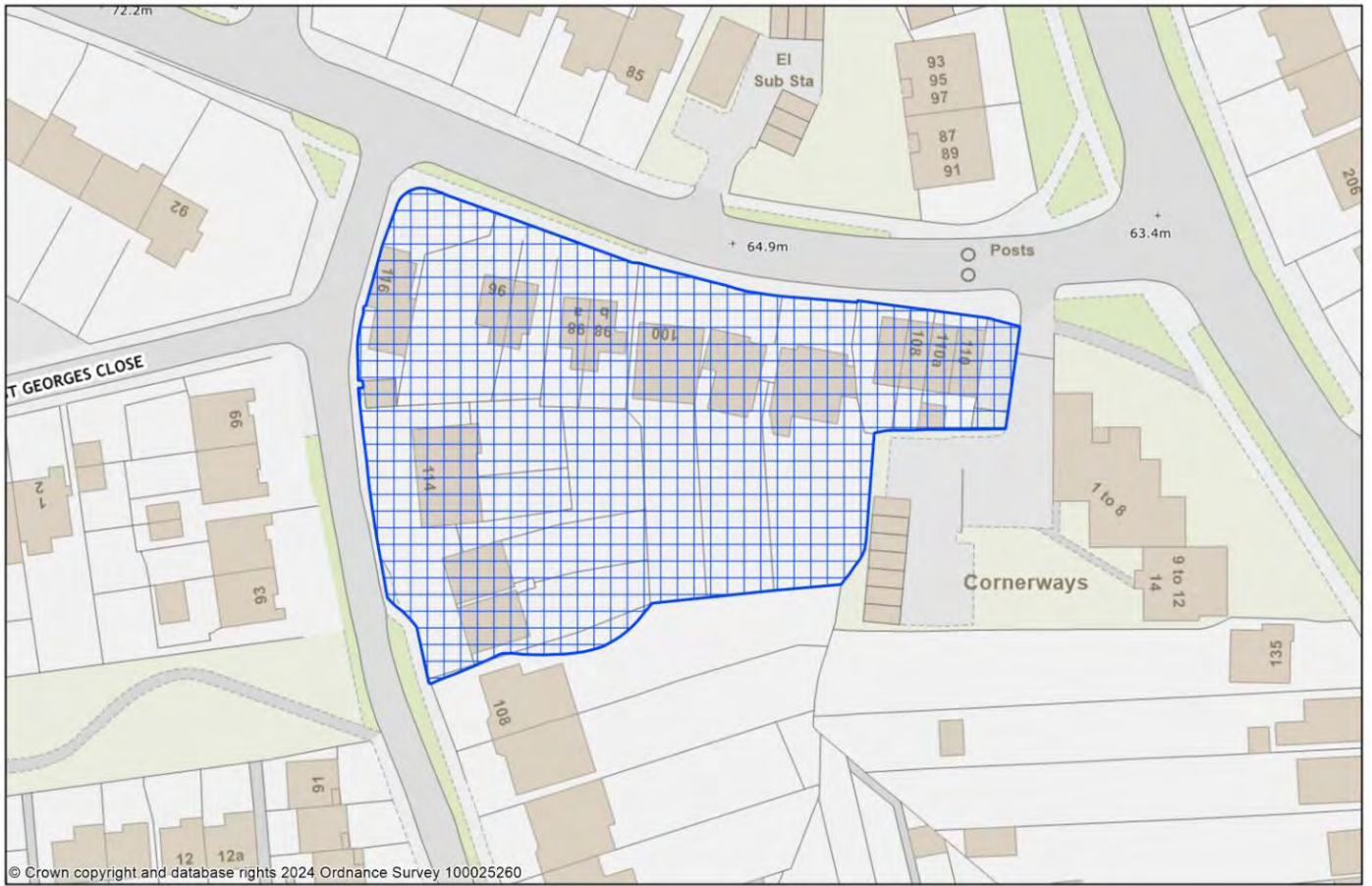


1:2500

0 0.025 0.05 kilometres



# Sudbury Cottages Conservation Area: de-designation map



1:750

02 May  
2024

0 0.01 0.02 kilometres

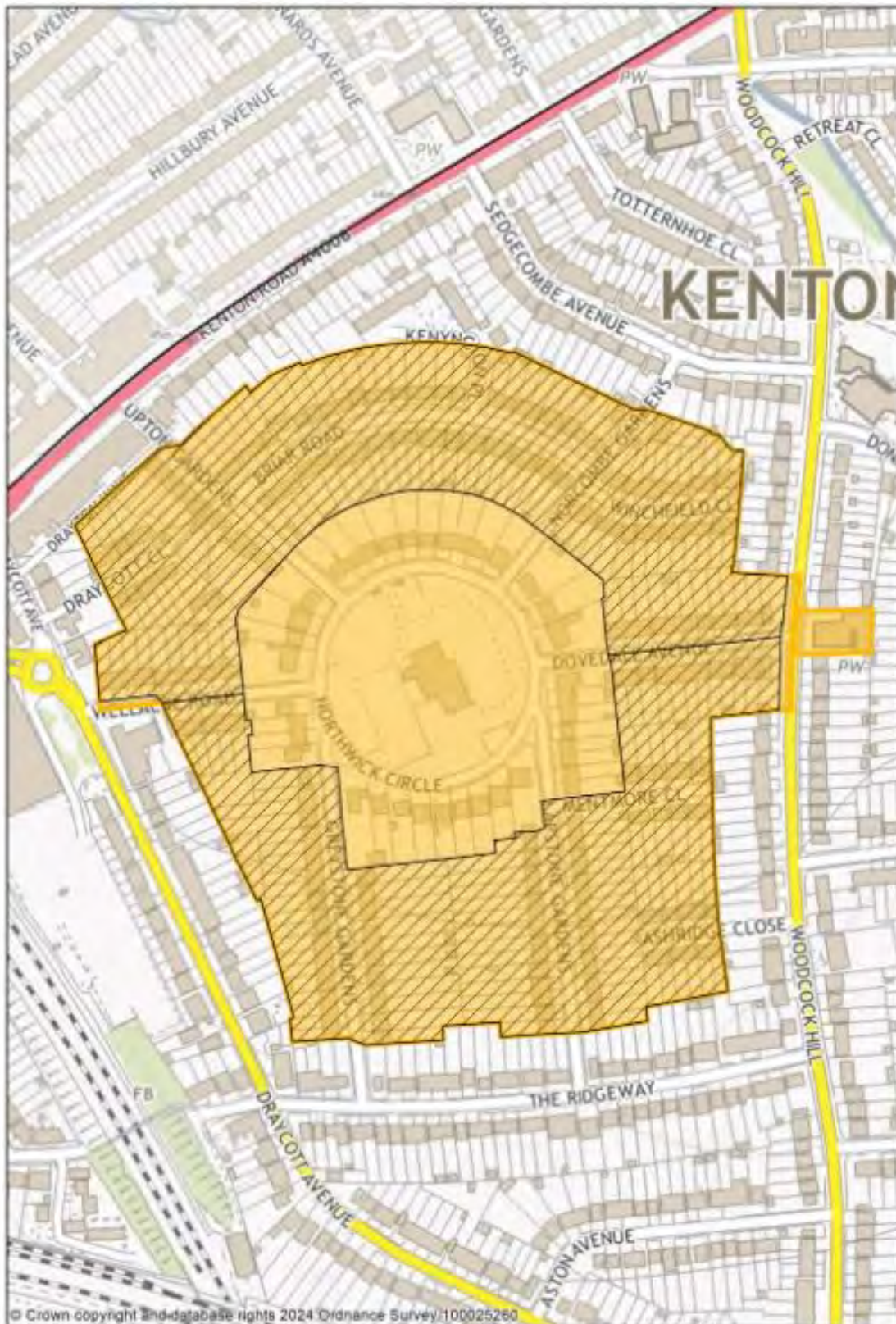




## Appendix D: Article 4 Direction Removals

Northwick Circle Conservation Area: areas where the Article 4 Direction will be relaxed  
(key: orange=retained conservation area; black diagonals=area where the Article 4 Direction will be relaxed)

(NB: Black diagonals= is also the area that was subject to the consultation for de-designation)



1:4000

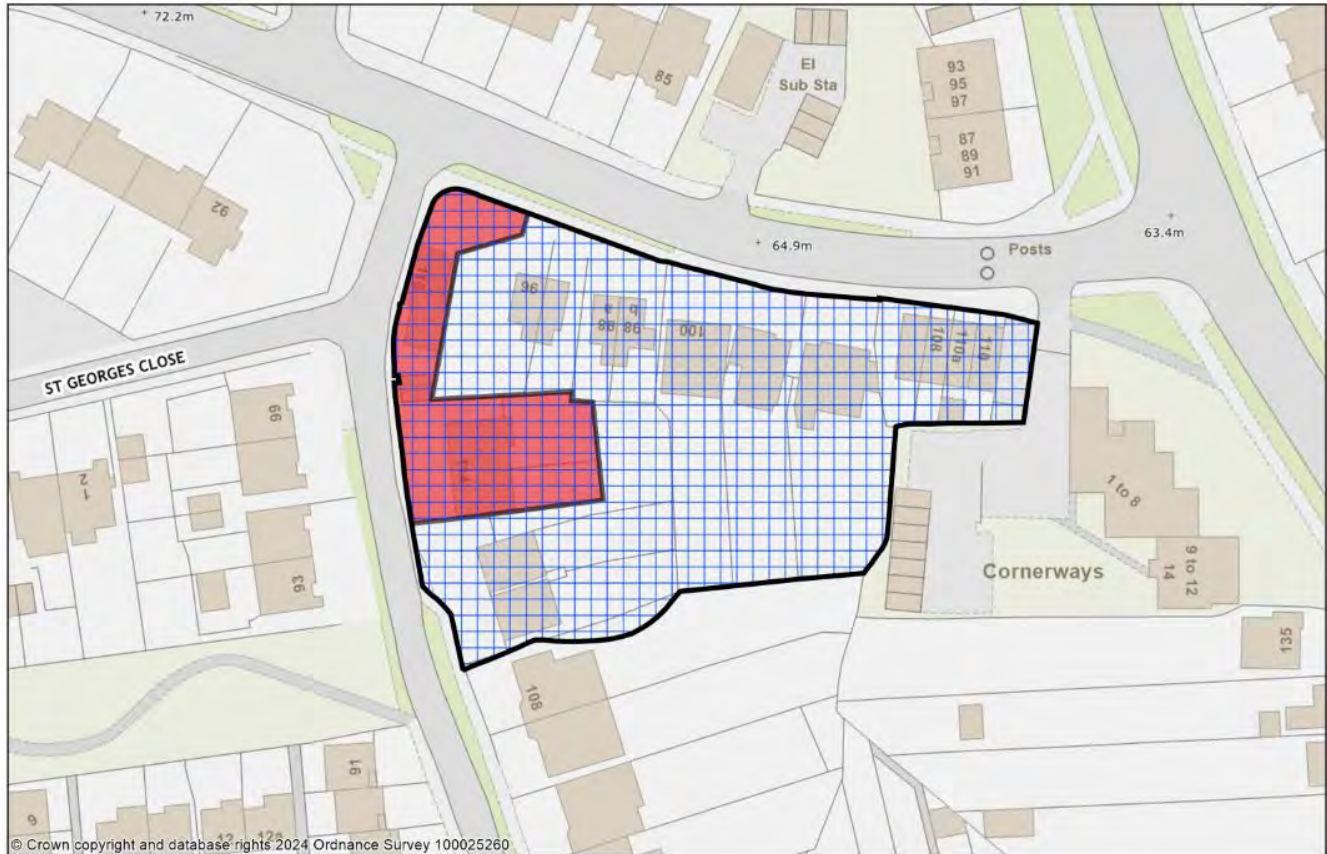
0 0.05 0.1 kilometres



Brent

Sudbury Cottages Conservation Area: properties to be removed from existing article 4 direction and where new Article 4 Directions will be made

(key: orange = locally listed properties where the Article 4 Direction will be remade; blue=area to be removed)



1:750

07 May  
2024

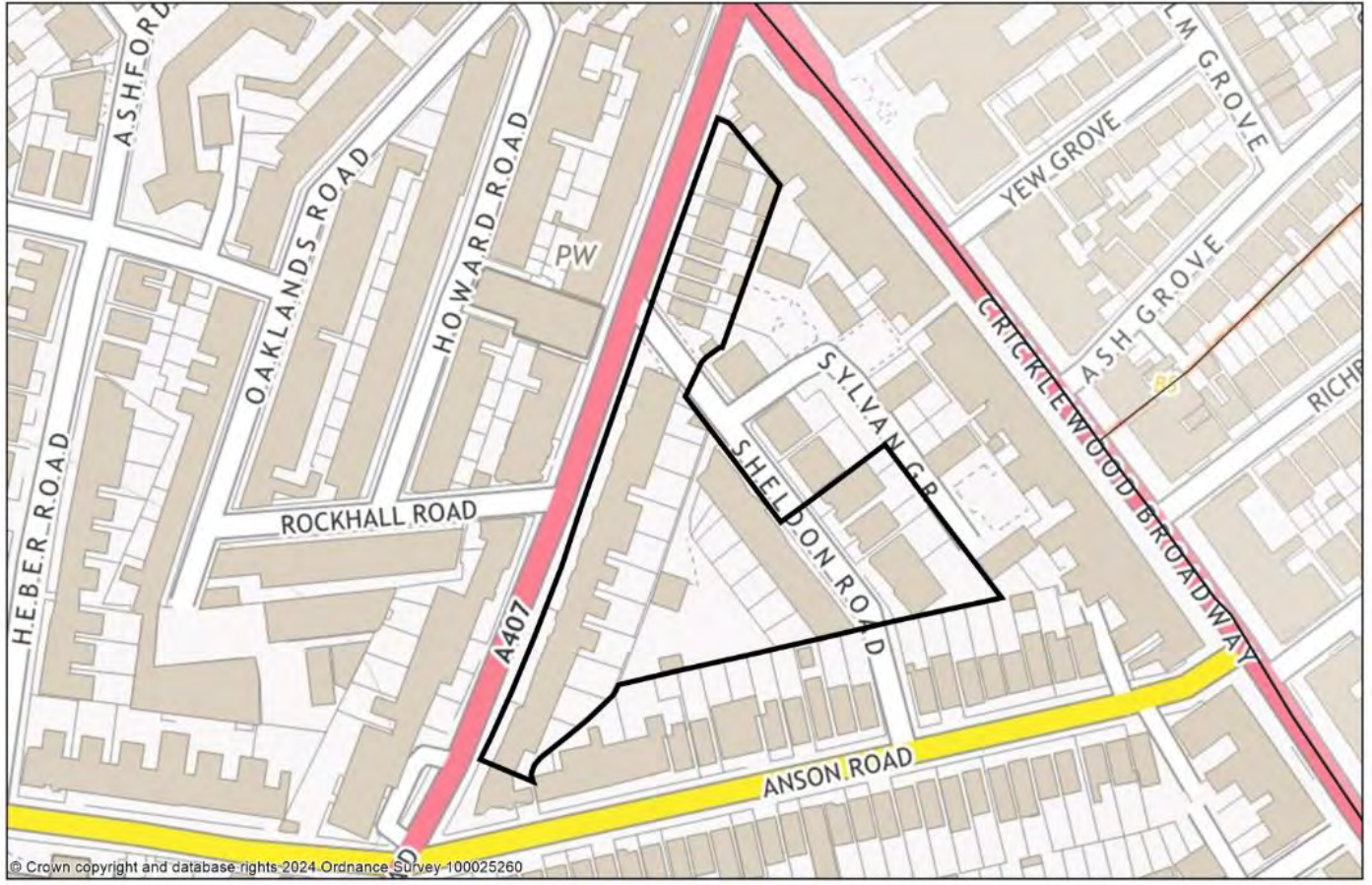
0 0.01 0.02 kilometres





# Appendix E: New areas to be covered by Article 4 Directions

## Mapesbury Conservation Area: proposed Article 4 Directions

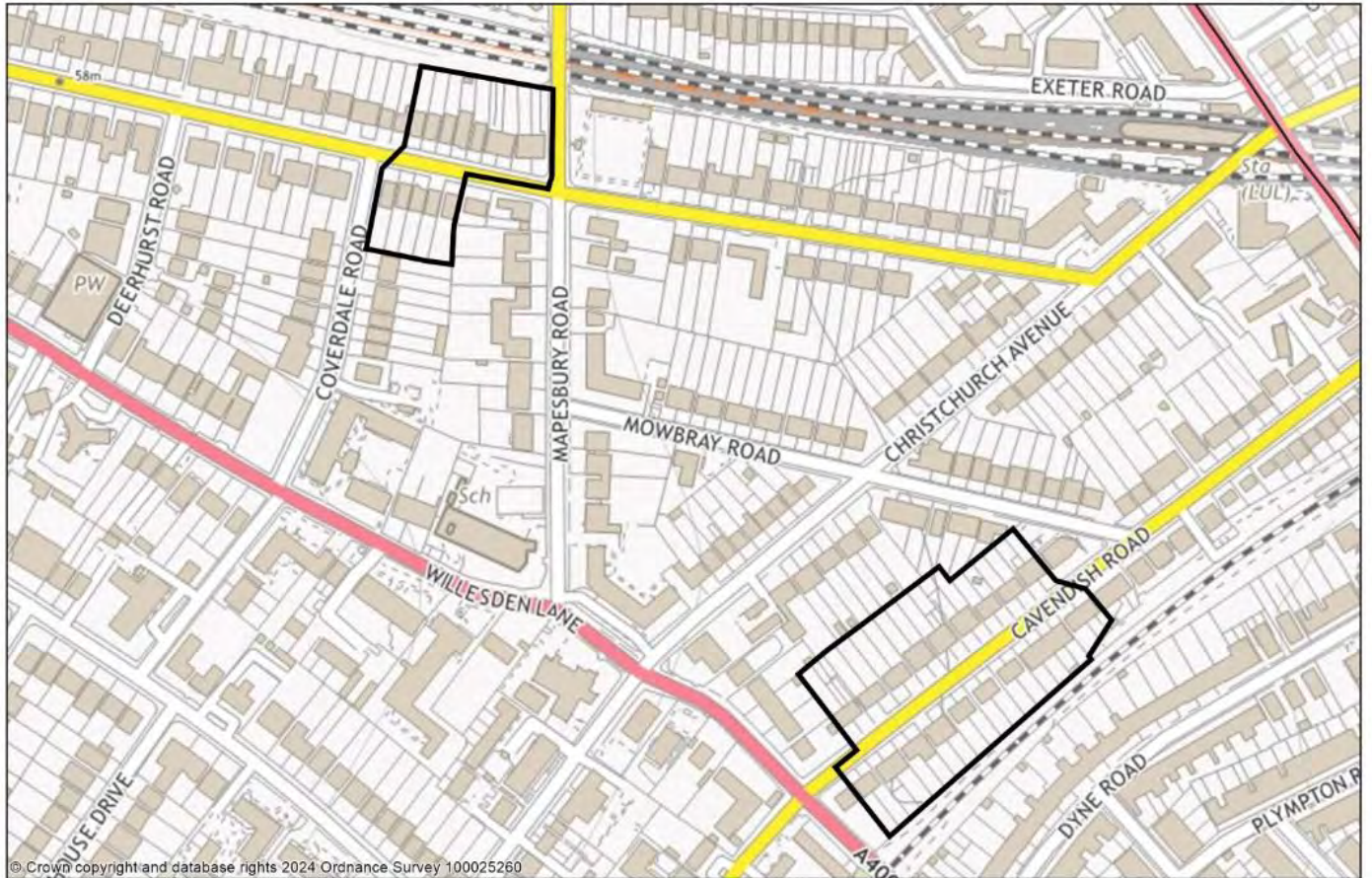


1:2000

26 April  
2024

0 0.025 0.05 kilometres





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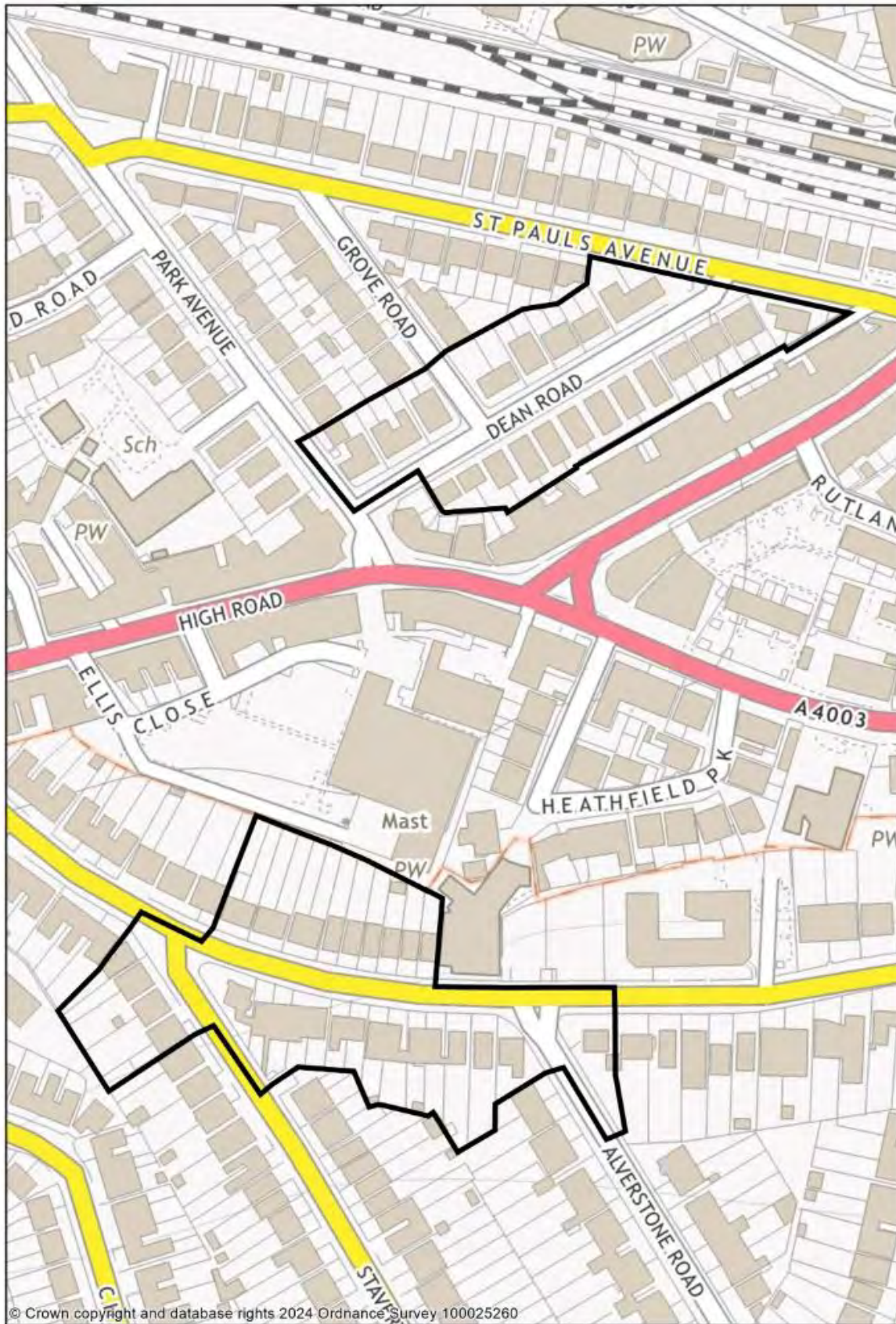
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26 April  
2024

0 0.05 0.1 kilometres





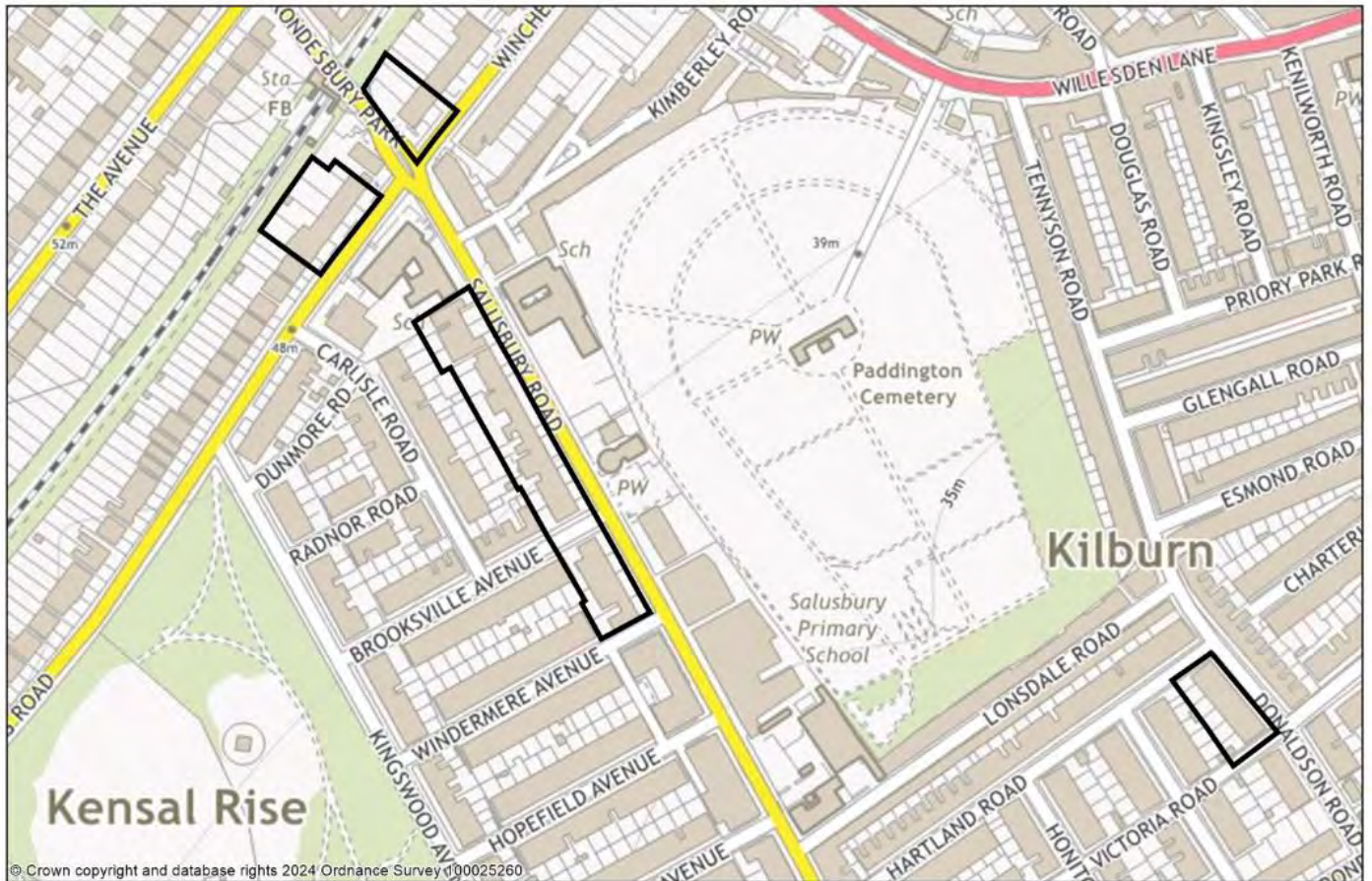


1:2500

0 0.0250.05 kilometres







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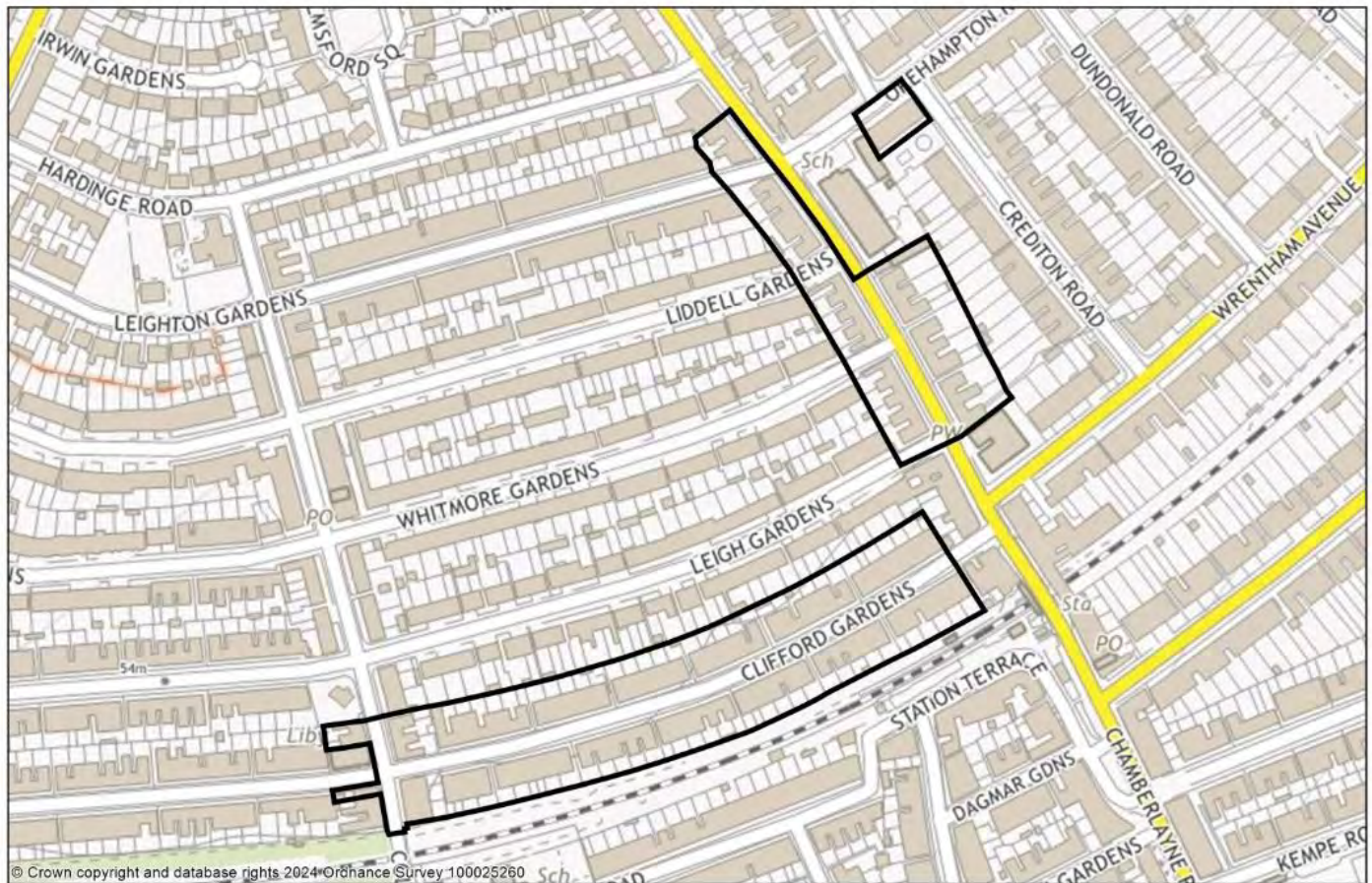
1:3500

26 April 2024

0 0.05 0.1 kilometres







1:3500

26 April  
2024

0 0.05 0.1 kilometres



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## Appendix F Character Appraisals for Conservation Areas Under Review

### Proposed boundary extension

- [Brondesbury](#)
- [Harlesden](#)
- [Mapesbury](#)
- [Queen's Park](#)
- [Willesden Green](#)

### Proposed new conservation area

- [Kensal Rise](#)

### Proposed boundary reduction

- [Buck Lane](#)
- [Northwick Circle](#)

### Proposed de-designation

- [Sudbury Cottages](#)

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Appendix G: summary of representations received and Officer response.

Response	Summary of comments	Officer response
<b>General comments</b>		
Resident	The council does not uphold the conditions of Article 4 and does not oversee/review the work post-completion. Their lackadaisical attitude is causing a deterioration in the value of the properties in the conservation areas mentioned. This needs to change, and accountability needs to be restored.	The Council takes enforcement action where it is considered expedient to do so in line with planning enforcement policy. If planning permission is required, and has not been obtained, then we apply an expediency test before pursuing enforcement action. Brent takes more enforcement action than most other Planning Departments.
Resident	Preservation of our heritage enhances the entire community and borough. Implementing changes that disregard this principle renders the planning process futile.	Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) states: 'It shall be the duty of a local planning authority from time to time'. The exercise to investigate potential conservation areas has been undertaken as part of fulfilling this duty on an ongoing basis. Good practice guidance issued by Historic England (Advice Note 1) recommends that conservation areas are reassessed to establish whether their boundaries are still appropriate. In such cases, boundary revisions will be needed to exclude them or, in exceptional circumstances, reconsideration of the overall conservation area designation.
Resident	I am concerned about the impact that the proposed conservation areas could have on property values.	Impact on property value is not a relevant consideration to be taken into account when determining whether to designate a conservation area.
Resident	I do not support the proposed new conservation area/boundary extensions	15 households do not support the proposed new conservation area/boundary extensions.
Residents	I support the proposed new conservation area/boundary extensions	4 households support the proposed new conservation area/boundary extensions.
Resident	In May 2019 four possible new conservation areas were proposed by Brent, where formal public consultation on these four proposed new conservation areas was pledged as both necessary and to be undertaken. This consultation only includes Kensal Rise and not Dudden Hill, Kilburn Lane and Malvern Road. Please can you detail the Brent internal process 2019 to 2024 which agreed this reduction of 4 possible new conservation areas down to 1 for the public consultation finally now starting?	The Brent Historic Environment Place-making Strategy 2019 recommended that 4 new areas be looked at for possible designation. However, a further survey revealed that Dudden Hill, Kilburn Lane and Malvern Road were not currently regarded as being of sufficient architectural or historic interest or a priority location for a new conservation area in this round of consultation. The law defines conservation areas as 'areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'.
Hillcroft Crescent Residents' Association	We should not be de-designating or reducing any conservation areas. In fact we should be increasing them.	General objection to the de-designations noted.

Historic England (Statutory Consultee)	The documents are clear and provide useful summaries of the existing conservation areas as well as details of the proposed changes. In the event of a fuller appraisal, we would expect to see greater emphasis on strategic views, setting, condition, open space and issues etc. as set out in our published guidance. We would also recommend that they are accompanied by area specific management guidelines at set out in our published guidance. We therefore assume for the purposes of this response that the documents are intended to be read alongside existing appraisals and management guidance as summary updates rather than as replacements and our comments based on this understanding.	It is noted that fuller, more comprehensive character appraisal and management guidelines are recommended. The existing character appraisals are out of date and the historical information and character analysis of the areas has been reproduced and updated in the new appraisals (except Harlesden which will be retained). Most of the conservation areas have Conservation Area Design Guides which will be used in those areas where the boundaries are to be extended. Further Design Guides are to be drafted for those areas which currently do not have one. Shopfront guidance is maintained through SPD 3.
Natural England (Statutory Consultee)	Natural England does not have any specific comments on this Conservation Area Amendments.	No comment on the proposals.
National Highways (Statutory Consultee)	We note that none of the areas concerned share a common boundary with the SRN. The mere designation/de-designation of conservation areas as well as changes of boundaries does not appear to generate material impact on the SRN. As such, we raise no comments on the proposals. However, we would appreciate future opportunities to review development proposals at these areas in order to safeguard the interest of the SRN and to provide informed advice to the local planning authority.	No comment on the proposals.
<b>Brondesbury Conservation Area: extension to boundary</b>		
Resident	Support proposed extension to Brondesbury Conservation Area.	Support for the Brondesbury Conservation Area.
Resident	I am in agreement with the principle and the extensions within Christchurch and Cavendish Road. I do not think that it should extend to Chatsworth Road beyond the Bowling Green as after this the rhythmic layout' ceases. There is no consistency and the redbrick style ceases. Some of the buildings between Mapesbury Road and Lydford Road are hideous and in no way should be preserved in their current form. They are not of any architectural significance.	The draft Brondesbury Character Appraisal recommends an extension to the boundary along Cavendish Road and a small section of Chatsworth Road. The properties to the northeast of Christchurch Road were considered to altered to be included. On Chatsworth Road, it is only 40-48 and 57-73 Chatsworth Road (between Mapesbury and Coverdale Road) that are recommended for inclusion in the conservation area. They are considered to be of superb architectural interest as they were designed by G. A. Sexton who worked on the Mapesbury estate. The large detached houses are generally well preserved and date from 1900.
Resident	As a resident and homeowner in Cavendish Road for over 23 years I could not be more in agreement with the proposal to extend the conservation area to include	The draft Brondesbury Character Appraisal recommends an extension to the boundary along Cavendish Road and a small section of Chatsworth Road. The

	Cavendish and Christchurch Road and any related efforts to preserve and protect the original architecture and character of these streets.	properties to the northeast of Christchurch Road were considered too altered to be included.
Resident	The documents are really interesting, but there is nothing setting out in ordinary language which developments will require planning permission if the conservation area is extended.	There are illustrations on page 8 and page 9 which set out what is likely to require planning permission. A Design Guide is planned for the area.
Historic England (Statutory Consultee)	The proposed extensions predominantly encompass decorative Victorian Villas which are of similar quality to those included within the existing conservation area boundary and as such are of similar heritage significance and we have no specific observations and are content for the LPA to designate the area as proposed.	In support of the proposals.
<b>Buck Lane Conservation Area: reduction to boundary</b>		
2 households in Hay Lane	I support the findings of the Buck Lane Conservation Area Boundary Review. I support the de designation of Hay Lane properties Nos. 56-68 within the Buck Lane Conservation Area. The properties on Hay Lane within the conservation area do not contribute to the character of the conservation area. The properties on Hay Lane have been eroded by piecemeal developments, changes to boundary treatments, green features, cladding, roof extensions and gardens. The properties are of similar ordinary character to the other properties outside the conservation boundary on Hay Lane."	The Character Appraisal for Buck Lane does include the removal of Hay Lane. However, some residents in Hay Lane were opposed to the de-designation of their road. Residents recognised that the houses were not as architecturally significant as the Trobridge properties, nevertheless, they felt that the deep verdant front and back gardens contribute to the hillside setting of the conservation area.
3 households in Pear Close	The reduction of the conversation area is well overdue. As per the consultation document the houses on Pear Close have no significant architectural features and do not align to the original architect's quirky designs.	The Character Appraisal for the Buck Lane Conservation Area recommends a reduction to the boundary, removing Pear Close.
Resident	The Council should not give up the responsibility for managing the conservation area. It has put no resources into managing the zone. I believe that there is another agenda and that it wants to do something in the road that it can't currently do, perhaps introducing some kind of parking scheme.	The Council is committed to managing the Buck Lane Conservation Area. It is a statutory duty of a local planning authority to review conservation areas from time to time'. Historic England recommends every 10 years. It also advises that boundaries should be reassessed to establish whether their boundaries are still appropriate. In such cases, boundary revisions will be needed to exclude them.
Resident	I live on Pear Close (Buck Lane Conservation Area) and I do not think it should be a conservation area. I support the reduction in the conservation area. All the houses are different to each other.	The character appraisal for the Buck Lane Conservation Area recommends a reduction to the boundary, removing Pear Close.



Historic England (Statutory Consultee)	The proposal sets out a reduction in the boundary of the existing conservation area. Designated in order to capture the special interest of the Trowbridge designed estate, the proposal would remove buildings not attributed to the architect and of noticeably less architectural merit. The approach is consistent with the NPPF requirement to ensure that conservation areas have sufficient merit to warrant designation and as such Historic England has no objections to the proposal.	No objection to the reduction in size of the boundary.
<b>Harlesden Conservation Area: extension to boundary</b>		
Resident	I support the Harlesden extension. I have no opinion on the other extensions.	Support for the Harlesden Conservation Area extension.
Resident	I live in the Harlesden CA. Support proposed extensions and/or new conservation areas.	Support for the Harlesden Conservation Area extension.
Historic England (Statutory Consultee)	The proposed changes are supported by a detailed analysis from Donald Insall Associates and set potential for an extension to include the former cinema at 26 Manor Rd and the adjacent terrace, and an extension incorporating properties along Craven Hill Road. These proposals reflect the scope of the recent High Street Heritage Action Zone which recognised the historic interest and townscape quality of the wider area. Historic England therefore considers the proposed extensions appropriate and considers the proposal will help safeguard the heritage significance of Harlesden town centre.	In support of the proposals.
<b>Kensal Rise: new conservation area</b>		
Resident	I strongly support the Kensal Rise area conservation area.	18 households support the Kensal Rise Conservation Area.
Resident	It would be great if Kensal Rise could be a conservation area as it would preserve the historic nature of the Victorian houses in the proposed area and stop them losing all of their charm and character.	Support for the Kensal Rise Conservation Area.
Resident	Designate Kensal Rise: Chamberlayne road, Station terrace and surrounding areas to bring in line with improvements around Queen's Park. Area is very family oriented.	Support for the Kensal Rise Conservation Area.
Resident	Please designate Kensal Rise (Manor School, Church of the Transfiguration, Station Terrace, Clifford Gardens and residential properties and shops along Chamberlayne Road)	Support for the Kensal Rise Conservation Area.



Resident	The late Victorian properties along Chamberlayne Road, are most attractive unique for this area and are worth preserving and that goes for Station Terrace, Clifford Gardens and the Church etc.	Support for the Kensal Rise Conservation Area.
Resident	I live in Kensal Rise. I do not support new conservation area/boundary area extensions.	2 objections to the Kensal Rise Conservation Area.
Resident	I disagree with the proposed Kensal Rise conservation area. Specifically, Clifford gardens. Why should residents have more controls put upon what they can do to our homes.	The new conservation area designation is considered to be justified as set out in this report. Although conservation area designation means some extra planning controls and considerations, these exist to protect the historic and architectural elements which make a place special and unique. Many alterations in a conservation area are permitted development or acceptable in principle if designed in a specific way.
Resident	Despite all the lyrical descriptions of the area in the consultation document, in fact the area is made up of Victorian terraced houses you find all over London. Chamberlayne Road is a traffic funnel and undistinguished. Furthermore the council was happy enough to asphalt the footway and not use more aesthetically pleasing paving stones because it was cheaper. I think it is wrong when there is a housing and cost of living crisis to make it more difficult to for people to install solar panels or extend into the loft. Also, it offends against natural justice for people to be forbidden to make standard home improvements. It's true the gables are pretty but that does not overcome the general grottness of the area and actually the configuration of Clifford Gardens is such that the velux windows are barely noticeable.	The reason for including Clifford Gardens in a conservation area is because of its special architectural and historic interest and its intactness. Local planning authorities have a duty under the Planning (Listed Buildings and Conservation Areas) Act 1990, to determine and review which parts of their area are of special architectural or historical interest, the character or appearance of which it is desirable to preserve or enhance, and to designate such areas as conservation areas. Only 12 properties out of 134 have roof extensions that are constructed on the outrigger meaning that the character of the roofscape remains preserved. The Council has yet to consider the management of this conservation area and it may be that it will be less restrictive than other conservation areas. In any case, many retrofitting proposals such as triple glazing, rooflights, PV panels and heat pumps are likely to be permitted development or acceptable on a case by case basis.
	This street is unique among all the Langler & Pinkham streets in the area. The pediments are to be found nowhere else and the terracotta friezes (those which remain) between the ground and first floors are also quite rare. There has been a great deal of development on the street, mostly with new residents restoring the distinctive tripartite bay windows and stripping paint off the original brickwork. Many (but by no means all) have also faithfully copied the original front doors. I am concerned that these elements will not be preserved. Sadly, some houses have already enclosed the original	The architectural features mentioned are those that make the area special. The reason for including Clifford Gardens in a conservation area is because of its special architectural and historic interest and its intactness. Local planning authorities have a duty under the Planning (Listed Buildings and Conservation Areas) Act 1990, to determine and review which parts of their area are of special architectural or historical interest, the character or appearance of which it is desirable to preserve or enhance, and to designate such areas as conservation areas. The designation will allow control over alteration and demolition of these special architectural features and encourage improvements over elements that have been altered.

	porches, replaced the original windows with aluminium and painted the brickwork.	
Resident	The proposal for Chamberlayne Road is a good proposal. The frontage of most building especially those above the shops have wonderful architecture. Preserving the church, cinema and pub in their period is also sensible. With the work completed at station terrace, mainly with reference to Tesco, the buses still get stuck going into Dagmar terrace from cars parking on double yellow lines. A sensible and easy solution is to turn the double yellow lines on station terrace and going into Dagmar into red lines. Cars and vans loading and unloading, blocking traffic, noise, broken pavements. It may be time to move them to a more industrial spot and not a residential spot. This could give way to more trees and green spaces for the area.	Regarding the comment around vehicles parking on double yellow lines in Station Terrace, changing the colour of the lines to red would not be possible in this location. Red lines are only used on major roads or routes of strategic importance. Unfortunately, Station Terrace does not fall under this category.
Resident Page 120	Having lived in this area for over 30 years, we saw an extreme increase in overdeveloped kitchen extensions, which sometimes dramatically adversely affected neighbouring quiet enjoyment, the properties, the style and amenity space. The overall results drastically changed the local area. Our neighbour got away with building his extension to high and caused cracks in our property. This was due to inspections not being carried out, and no scrutiny on the final build.	In a conservation area, permission is needed for a single storey extension that extend more than 3 metres beyond the back wall of a terraced house. Once an area has been designated as a conservation area, any works which require planning permission within a conservation area become subject to local conservation policies set out in the Local Plan and national policies outlined in the National Planning Policy Framework (NPPF). The overarching duty, as set out in the Act, is to preserve or enhance the historic or architectural character or appearance of the conservation area. Works of a structural nature would be the subject of building control.
Resident	There is a scrap yard in full operation that is not approved. There are constant Lorrie's with scrap that drive down station terrace into the yard Loading and unloading. Brent have never stopped the scrap yard or people living there.	The Council has issued an Enforcement Notice for the site, which the owners have appealed. Part of the Council's defence is that this is a proposed conservation area.
Resident	Agreement that this should be a conservation area given the many houses (Chamberlayne Road and Clifford Gardens), institutions (Church of the Transfiguration, Manor School etc) and Station Terrace historical significance!	Resident supports the extension to the conservation area.
Resident	The proposed conservation area for Malvern Road has not been taken forward as part of this review. Malvern Road, a Victorian local centre village shops, mews, terraces and villa houses face 51 metre tall building zone. Malvern Road is clearly at massive risk from tall buildings.	The Brent Historic Environment Place-making Strategy 2019 indicated that these areas would be considered further in their appropriateness for conservation area status. However, some of Malvern Road is not currently regarded as being of sufficient architectural or historic interest or a priority location for a new conservation areas in this round of consultation. The law defines conservation

		areas as 'areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'.
Resident	I support the proposed Kensal Rise Conservation Area. The old buildings/architecture and mansion block as well as the old style cafes must be maintained in their best standard in the period of their design. I feel Brent have done a great job adding new trees, benches and much better paving to the area and I feel the community would benefit from this area going into conservation area. What does not make sense is the green containers on Station Terrace.	Part of the land that contains the shipping containers is being included as it provides a logical boundary to the conservation area. Inclusion will also mean that Enforcement can be undertaken on the containers and their use.
Resident	I would suggest that Hardinge Road (and parallel streets) be included in the proposed Kensal Rise Conservation zone. This would help stop the continual erosion of front gardens, hedges and removal of old but healthy trees. 1930s architecture is definitely worth conservation.	The Brent Historic Environment Place-making Strategy 2019 recommended that some of the roads and streets on the boundary of the proposed Kensal Rise Conservation Area should be considered further in their appropriateness for conservation area status. However, Hardinge Road (and parallel streets) are not currently regarded as being of sufficient architectural or historic interest or a priority location for a new conservation area in this round of consultation. The law defines conservation areas as 'areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'.
Resident	I would suggest extending the Kensal Rise conservation area to include all the southern streets - Mortimer Road all the way north and including all the roads (N-S & E-W). It will be easier for people to accept that the entire area is concerned rather than just bits and pieces here and there. One fell swoop and everyone has to get on board and respect the planning rules and regs.	Mortimer Road and the surrounding streets are not currently regarded as being of sufficient architectural or historic interest or a priority location for a new conservation areas in this round of consultation. The law defines conservation areas as 'areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'.
6 Householders	I am generally in favour of keeping the frontage of Clifford Gardens as much as possible as it was when it was built. There are some things however that I do not think should be restricted, namely: Velux windows (to front roof slopes) as there are many in the street and Rear L-shaped/full width dormers, as these cannot be seen from the street. Properties in London are expensive and to put restrictions on those properties that have not yet used their loft space will make no difference to the character of the street but maybe well be detrimental to residents living well, their mental health and to their property prices. Sensible ways of harnessing double and triple glazing, wind power, solar power, heat pumps etc	The reason for including Clifford Gardens in a conservation area is because of its special architectural and historic interest and its intactness. Local planning authorities have a duty under the Planning (Listed Buildings and Conservation Areas) Act 1990, to determine and review which parts of their area are of special architectural or historical interest, the character or appearance of which it is desirable to preserve or enhance, and to designate such areas as conservation areas. Only 12 properties out of 134 have roof extensions that are constructed on the outrigger meaning that the character of the roofscape remains preserved. The Council has yet to consider the management of this conservation area and it may be that it will be less restrictive than other conservation areas. In any case, many retrofitting proposals such as triple glazing, rooflights, PV panels and heat pumps are likely to be permitted development or acceptable on a case by case basis.

	should all be allowed. Our pavements were tarmacked recently despite opposition.	
Kensal Rise Residents' Association (KRRRA)	<p>Established in 2011, the KRRRA enjoys the support of local residents and is the recognised voice for the Kensal Rise area. Our association and its members wholeheartedly support the proposals to designate all properties shown in the map below with conservation status and commend Brent Council's efforts to preserve the historical integrity of our community. The buildings in question are not merely structures; they are important historical assets that contribute significantly to the cultural fabric of the Kensal Rise area and the wider Brent Borough. Their preservation is vital in maintaining the heritage and character that defines our neighbourhood.</p> <p>In light of these considerations, we propose that since these important assets are located within the Queen's Park Ward, which comprises Kensal Rise and Queen's Park, it would be fitting to house the Ward's conservation areas under one umbrella and rename it the 'Kensal Rise and Queen's Park Conservation Area', abbreviated 'KRQP Conservation Area'. Such a renaming would align with the ethos of unity within the Queen's Park Ward and acknowledge the shared heritage of our communities. We express our sincere gratitude to you and team for your hard work and commitment to recognising and preserving the important historical heritage buildings in the Queen's Park Ward. Your dedication to this cause is invaluable and greatly appreciated by all residents. We hope you will favourably consider our renaming proposal."</p>	<p>Kensal Rise Residents' Association (KRRRA) supports the proposals.</p> <p>However, it is not recommended to amalgamate the two areas and rename them as the 'Kensal Rise and Queen's Park Conservation Area'. Kensal Rise is a distinct town centre which is predominantly commercial and retail in character with a distinctly different architectural style to the residential terraces and character of Queen's Park. It would become quite a large conservation area to manage with different planning management policy.</p>
Historic England (Statutory Consultee)	The Conservation Area Character Appraisal which accompanies the consultation sets out a clear case for Kilburn Rise as a characterful local Victorian town centre which despite general loss of historic shopfronts and architectural features, retains an attractive historic townscape. The area contains a number of buildings of notable local interest including the prominent landmark of the Catholic Church of the Transfiguration, the Constitutional Club, and local schools. The townscape is a surprisingly complete collection of Victorian/Edwardian	In support of the proposals. It is noted that fuller, more comprehensive character appraisal and management guidelines are recommended. It is proposed to undertake a Design Guide for the area as well as updated guidance on the website. Shopfront guidance is maintained through SPD 3.

	<p>buildings and the summary report sets out a strong case for designation as a conservation area. The proposed boundary appears tightly drawn and appears to exclude any areas which might be considered to detract from the local character and appearance and is therefore considered to be in conformity to NPPF Policy 197</p> <p>In the event of adoption, we would recommend the summary report, which provides a detailed spatial analysis of the character, should be expanded to include additional considerations as set out in our published guidance on the appraisal and management of conservation areas. This could usefully cover issues such as the setting of the conservation area, key views and current condition. Given the nature of the area, providing additional advice in respect of shopfront design guidance and advertising and the planning policy requirements which will apply would be helpful to managing future change.</p>	
<p>Page 123</p> <p>Transport for London (statutory consultee)</p>	<p>We note the inclusion of Kensal Rise station within the proposed new conservation area for Kensal Rise and raise no objections. We enclose the newly revised London Overground Station Heritage Register entry for this station to provide you with some additional historical information.</p>	<p>Supports the inclusion of Kensal Rise station.</p>
<p><b>Mapesbury Conservation Area: extension to boundary</b></p>		
<p>Resident</p>	<p>I support the proposed extension to the Mapesbury Conservation area which includes what was Barclay's Bank in Cricklewood Broadway.</p>	<p>Support for the Mapesbury Conservation Area extension.</p>
<p>Resident</p>	<p>I would like to see Melrose Avenue NW2 included in the Mapesbury Conservation Area. I feel it is worth as it shows a style of the period of detached homes for middle income owners at the time True there are unauthorised and poor alterations but overall the street has a character of the period and a mixed style which is consistent"</p>	<p>The Brent Historic Environment Place-making Strategy 2019 recommended that some of the roads and streets on the boundary of the proposed Mapesbury Conservation Area should be considered further in their appropriateness for conservation area status. However, Melrose Avenue is not currently regarded as being of sufficient architectural or historic interest or a priority location for a new conservation area in this round of consultation. The law defines conservation areas as 'areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'.</p>
<p>Resident</p>	<p>I have serious concerns that Brent cannot handle the extra workload and obvious enforcement action needed. If you extend/add so much more areas designated as</p>	<p>The vast majority of property owners within conservation areas take their responsibilities seriously and respect the designation. Whilst the Council is designating some additional areas, it is also removing others, thus the additional</p>

	<p>conservation areas, whilst I am sure a lot of residents/homeowners will be in favour, it is the ones that won't abide by the conditions that conservation area status involves. I query has Brent the budgeted for the extra enforcement officer properly trained planning officers who understand design and design details.</p> <p>I support the extension to the blocks along the High Road. These are exceptional in their detail and skyline.</p> <p>What about the block between Chichele and Oaklands Road these blocks are just as good. I own property in St Pauls Ave area I support but again concerned at the number of non-resident landlords that already fail to abide by planning law. Why is Stanley Gardens and Blenheim Gardens not included? Likewise, Station Parade.</p>	<p>potential for resource required for enforcement is considered small, and in any case will be balanced against other enforcement priorities at the time. The Brent Historic Environment Place-making Strategy 2019 recommended that some of the roads and streets on the boundary of the proposed Mapesbury Conservation Area should be considered further in their appropriateness for conservation area status.</p> <p>However, St Paul's Avenue, Stanley Gardens, Blenheim Gardens are not currently regarded as being of sufficient architectural or historic interest or a priority location for a new conservation area in this round of consultation. The law defines conservation areas as 'areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'. 173-191 Cricklewood Broadway (the block between Chichele and Oaklands Road) is proposed to be included.</p>
Resident	I live in the proposed extension of the Mapesbury conservation area, and I wanted to write to say I am supportive of the extension. The facades of the flat block I am in and the trees outside are important to the character of the area and should be protected.	Resident supports the extension of the conservation area.
Historic England (Statutory Consultee)	The proposals would incorporate properties of similar scale and appearance to the existing conservation area and as such we have no specific observations and are content for the LPA to designate the area as proposed.	In support of the proposals.
<b>Northwick Circle Conservation Area: reduction to boundary</b>		
Resident	Article 4 should be removed as it's costly for residents already in a time of difficulties to make changes.	It is proposed to remove the Article 4 Directions for front gardens, windows and front doors.
Resident	As stated in the document to remove the conservation area, this is clearly noticeable on more than all houses on Greystone and Lapstone Gardens where houses are not consistent with designs and no actual case to keep these in the conservation area.	29 households support the de-designation of the Northwick Circle Conservation Area.
Resident	If restrictions are removed, then the buffer zone to Northwick Circle will be removed. It will mean that large extensions etc would be visible from Northwick Circle, etc. Even though a few houses on Winchfield do not follow the rules, there have not been vast changes as you	42 households object to the de-designation of the Northwick Circle Conservation Area.

	see in other areas. On the whole, the rules keep unsightly changes from occurring.	
Resident	<p>The houses in the roads that are proposed to be removed, being built by Costin, are far more consistent with the overall design and character of the area. Although there are properties that have been altered unsympathetically, the same might be said of some houses in Northwick Circle whose front gardens have been turned into large parking spaces. As a resident of the conservation area, I am proud, as are my neighbours, to have the designation and would like it preserved in its current scope. The shared heritage enhances our sense of identity.</p> <p>If the council is determined to make a change, perhaps it could consider retaining the existing conservation area but with a loosening of the Article 4 Direction for windows, front doors and front gardens. This would maintain the distinctiveness of the area while allowing residents to make certain improvements to their properties but prevent the type of egregious overdevelopment that would be detrimental.</p>	61 households support the relaxation of certain Article 4 Directions within the Northwick Circle Conservation Area (rather than de-designating the conservation area). Article 4 Directions would remain as existing for those properties surrounding the Circle but be relaxed in the remaining streets.
Resident	I am writing to express my deep concern and opposition regarding the recent decision to remove Upton Gardens from conservation. As a member of the community deeply invested in the preservation of our natural environment, I strongly urge you to reconsider this decision and maintain the road within the conservation area. The conservation of Northwick Circle and surrounding roads plays a vital role in preserving our local ecosystem and natural heritage. By removing it from conservation, we risk irreversible damage to the delicate balance of our environment. I understand that there may be reasons driving this decision, such as development or infrastructure needs. However, I implore the council to explore alternative solutions. In conclusion, I urge the council to reconsider its decision and take proactive steps to protect and preserve Upton Gardens within the conservation area. Our collective actions today will determine the legacy we leave for generations to come.	It is recommended to retain the existing Northwick Circle Conservation Area (as designated) but remove a number of Article 4 Directions for front doors, windows and works to front gardens for parts of the conservation area that were Character Appraisal has suggested would be appropriate for removal.

	<p>Thank you for considering my concerns. I look forward to a positive resolution that prioritizes the preservation of our environment.</p>	
Resident	<p>We have consulted via our WhatsApp group over the last month or so and within that group everyone who has expressed an opinion opposes the reduction of the boundary. Some, but not a majority, have expressed a view that all Article 4 Directions should be removed with regard to Directions concerning frontages. I am aware that you have received a petition in this regard supporting this on behalf of 12 properties in Briar Road. Despite claiming to be representing the whole community, this group has no status and has only contacted a minority of residents in our road. That petition refers to 56 signatories rather than the number of properties represented. I do not believe this is a majority view in our road nor of the Northwick Park Residents Association.</p> <p>There does appear to be a consensus that there should be some relaxation of the Article 4 Directions but with different opinions as to the detail of how the relaxations should work. Removing all the Article 4 Directions concerning frontages will undermine the Conservation Areas principles. However, mindful of the difficulties facing the Council in managing the Directions in their current form, its task can be ameliorated with some pragmatic relaxations and/or clarifications of some of the Directions which can still retain their more essential elements whilst taking account of the availability of suitable and sympathetic modern materials and allowing minor changes.</p> <p>If there is more flexibility on certain of the Directions, the Council will achieve more buy-in from residents, making the Council's management task easier. Indeed, it will actually be a positive factor which would encourage residents to acknowledge the positive benefits of a workable regime, rather than feeling that the Council is being inflexible.</p>	<p>First suggested at the drop-in sessions, an alternative solution could be reached whereby certain Article 4 Directions (for windows, doors and works to front gardens) be removed for those parts of the conservation area that were proposed to be taken out, but the conservation area boundary (as designated) remains.</p> <p>This suggestion was followed up by individual requests on the online survey and a petition signed by 56 residents from Briar Road, Draycott Avenue, Greystone Gardens, Lapstone Gardens and Winchfield Close.</p> <p>The Northwick Park Residents Association endorsed the alternative which it considered would maintain the thematic integrity of the area while allowing for some relaxation in certain Article 4 Directions to facilitate easier management and garner resident co-operation.</p> <p>It is recommended to retain the existing Northwick Circle Conservation Area (as designated) but remove a number of Article 4 Directions for front doors, windows and works to front gardens for parts of the conservation area that were Character Appraisal has suggested would be appropriate for removal.</p>



	Directions to be retained: windows, roofs; chimneys; and facing materials (e.g. pebbledash or the 'Tudor' look where applicable). Rear extensions and outbuildings (especially as these can easily be exploited for inappropriate uses). Directions to be relaxed: doors and porches.	
Friends of Woodcock Park	With regard to the proposed reduction of the conservation area boundary for the Northwick Circle Conservation Area, the Friends of Woodcock Park are opposed to any reduction in size to this Conservation Area. We wish to retain the character of the properties within the existing conservation area whilst permitting the use of energy saving materials. We also wish to preserve the green character of the area and especially the street trees. Flooding is an issue in Kenton, with surface water run off contributing to the localised flooding and the Wealdstone Brook is known to flood when there is heavy rainfall. It is essential that the tree protection status of the conservation area remains in force.	it is recommended to retain the existing Northwick Circle Conservation Area (as designated) but remove a number of Article 4 Directions for front doors, windows and works to front gardens for parts of the conservation area that were Character Appraisal has suggested would be appropriate for removal.
Historic England (Statutory Consultee)	The proposal sets out a sizeable reduction to the existing conservation area, primarily due to the erosion of the character and appearance through unsympathetic alterations, including the loss of front boundaries and gardens, traditional windows, doors and other key architectural features. We also note that the properties are relatively common 1930's suburban designs better illustrated in other conservation areas. On the basis of the evidence presented, we would consider the proposed reduction justified. However, de-designation due to the erosion of historic features illustrates the need for positive management and clear policies in respect of conservation areas. To avoid further erosion of character clear policies and a positive management plan would be beneficial.	Support for the reduction. The additional comments are about management of the conservation area which are addressed by the proposal to relax the Article 4 Direction.
<b>Queen's Park Conservation Area: extension to boundary</b>		
Resident	I should like to support the proposed extension to the Queen's Park conservation area to include Salusbury Road.	16 households support the extensions to Queen's Park Conservation Area.

Resident	In my opinion the case for the extension of the Queen's Park Conservation Area set out in the appraisal document is well made and on its basis I strongly support the recommended boundary extension.	Resident supports the extension of the conservation area.
Resident	There has been damage done to the character of the area in the last couple of years and very poor follow-up from the Council. I am in favour of some protection before it is too late.	The Character Appraisal for the Queen's Park Conservation Area recommends an extension to the boundary.
Resident	I live in the Queen's Park CA. I do not support new conservation area/boundary area extensions.	3 objections to the extension to the Queen's Park Conservation Area.
Resident	There are enough restrictions and planning regulations already. More rules make it more expensive to modernise Victorian houses which already suffer from poor insulation and build quality, and do not comply with any modern building standards.	The new conservation area designation is considered to be justified as set out in this report. Although conservation area designation means some extra planning controls and considerations, these exist to protect the historic and architectural elements which make a place special and unique. It is not true that Victorian houses suffer from poor build quality. Retrofitting buildings to make them more sustainable in conservation areas usually costs the same as those living outside conservation areas. Most work of retrofitting remains permitted development. This means that people can still be comfortable in their homes which remain historically significant and energy efficient.
Page 28 Islamia Girls School and the Islamia Primary School.	<p>We are a registered charity and the owners of the school site at 129 Salusbury Road, London NW6 6PE, which houses the Islamia Girls School and the Islamia Primary School, the latter of which was the first government-funded, Muslim-faith school in England. We also own the first floor apartment at 131b Salusbury Road, London NW6 6RG, and are flagging our interest in this consultation as both of these properties would come into the Queen's Park Conservation Area should the existing boundary be extended as proposed in the consultation document.</p> <p>As the relevant Council officers will be aware, our Foundation has, for some time now, been considering plans for the development of our school site. Indeed, we are presently progressing a feasibility study to develop all or part of our Salusbury Road site, by way of potential refurbishment and the addition of new buildings and facilities on this site, for the enhancement of our students' educational experience and attainment, and also the benefit of the local community. It should be</p>	<p>There has been no formal planning application or pre-application submitted for this site.</p> <p>An application for planning permission or development made in a conservation area will go through a more thorough process than a normal planning application. Thus, pre-application advice is advised as early as possible.</p> <p>However, the conservation area status does not mean that new designs cannot be contemporary; developments should aim to preserve the area.</p> <p>In determining a planning application, the Council must consider the contribution made by the current buildings to the character of the area and whether their demolition would alter this. Similarly, any proposed redevelopment or new building must actively preserve or enhance the character or appearance of the conservation area. Notwithstanding this, the use of the site would provide public benefits which could be weighed against any heritage harm presented by the development.</p>

	<p>noted that our initial plans for the development of the school site pre-date the current consultation by some years.</p> <p>It is our understanding that the purpose of designating or extending any conservation area is to preserve local areas that have specific architectural or historic interest and not, for example, where such designation or extension is motivated to impact any lawful developments. As custodians of the schools on the site, we are therefore quite interested in the outcome of this consultation. We are of course keen to see that any extension does not seek to prevent our future developments and look forward to working with the local authority in this regard.</p>	
<p>Resident</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 129</p>	<p>Hartland Road, Donaldson Road and the east end of Victoria Road were also built by Solomon Barnett but are considered too altered with full width large roof extensions to be included in the Queen's Park Conservation Area. The character appraisal states that 'These properties are more modest than the imposing villas in the Kilburn Conservation Area. They share the same architect of Queen's Park properties and thus their character. It is therefore proposed to relocate these properties (together with 18-38 Donaldson Road, which retain their architectural features) into the Queen's Park Conservation Area.' I assume Donaldson is Donaldson and therefore my house would be included in the revised Queen's Park Conservation Area.</p> <p>Extending this protection to side and back extensions and garden sheds does not protect the style of the area at all. Why would anyone care about garden sheds other than the need for them to be safe? No addition or shed will be of a Victorian or Edwardian design. Brent already has a planning permission process in place regarding safety and abiding by the building code rules. If every side/back exterior change (back extensions, garden sheds, etc.) will require extra planning permission this will add to Council costs as well as homeowner costs with no discernible benefit to the character of Queen's Park.</p>	<p>18-38 Donaldson Road is proposed to be included with the Queen's Park Conservation Area.</p> <p>Conservation areas are places that are deemed to be of special architectural or historic interest, and they require management to protect their specific character. This includes extensions to the rear and works within the rear garden.</p> <p>Garden rooms have soared in popularity in recent years with plenty of people setting up home gyms or offices. A garden room can be up to half the size of the rear garden under permitted development. This will harm the Queen's Park Conservation Area and is why an Article 4 Direction is proposed to cover the new areas.</p> <p>Basic 3 metre single storey rear extensions tend to be allowed under permitted development. Larger extensions can be more difficult but are sometimes permitted following advice in the Queen's Park Design Guide.</p> <p>Where planning permission is required, the Council will obtain the appropriate planning fee to process the application.</p>

	Therefore, I urge the Council to reduce the scope of building changes that require conservation planning permission and be more concerned with providing basic services.	
12 households	<p>I would like to suggest that the proposed Queen's Park Conservation Area extension should cover Crediton Road, Dundonald Road, Okehampton Road and Wrentham Avenue. Please note the Character Appraisal states that the roads above were assessed but 'although the front façades were found to be remarkably well preserved, the majority of the properties had very large dormers which extend onto the outriggers.</p> <p>As far as I am aware there is only one house on Dundonald Road that has a front dormer and none on Crediton Road.</p>	<p>The Brent Historic Environment Place-making Strategy 2019 recommended that some of the roads and streets on the boundary of the proposed Queen's Park Conservation Area should be considered further in their appropriateness for conservation area status. However, Crediton Road, Dundonald Road, Okehampton Road and Wrentham Avenue are not currently regarded as being of sufficient architectural or historic interest or a priority location for a new conservation area in this round of consultation. The law defines conservation areas as 'areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'. However, over half the properties on Dundonald Road have full-width rear dormers (some of which extend onto the outrigger). Crediton Road is much the same. Wrentham Avenue fairs better for rear dormers but over half the front gardens have been lost for the parking of cars.</p>
Queen's Park Area Residents' Association (QPARA)	<p>QPARA voted by an overwhelming majority to support in principle the revised boundaries set out in the consultation document. There was general appreciation of the work presented in the consultation document and the general thrust of the proposals. It was noted that Lonsdale Road and both frontages of Salusbury Road were to be included, which should include the properties between the railway line and Brondesbury Road/Harvist Road junction north of the railway line. This could be the subject of a more detailed discussion as there are some properties on both sides of Salusbury Road which could be included excluding the police station. Similarly the short terraces on the east side of Chamberlayne between Kempe and the railway line could be included since they fall within QPARAs boundary along the centre of Chamberlayne Road, thus adding consistency. It was hoped that some further discussion could take place over the reasoning for inclusion or otherwise of some individual 'short' terraces and properties which are within the QPARA boundary but the proposed revised CA boundary aligns better with our area.</p> <p>It was also agreed by the meeting to reject the proposal to include some areas outside the QPARA boundary as it</p>	<p>In support of the proposals. Some roads suggested for inclusion: 'between the railway line and Brondesbury Road/Harvist Road junction north of the railway line and some properties on both sides of Salusbury Road' are included in the Kensal Rise Conservation Area because they better relate to the character of that area.</p>

	<p>was felt that while those areas were worthy of the protection afforded by a CA and Art 4 Direction, these would be best kept separate and should be requested by resident groups from those areas rather than part of an enlarged QPCA. This applies particularly to the north section of Chamberlayne Road beyond the railway line and Tiverton Green and its surrounding streets.</p> <p>We agreed and supported the relocation of Honiton and Lynton from the Kilburn CA to the QPCA and agreed that because of existing over-development that Hartland, the western end of Victoria and Brondesbury Roads should not be included. There were some individual concerns about the criteria applied to some roads here, but acknowledgment that the properties have already been altered too much for inclusion.</p>	
<p>Historic England (Statutory Consultee)</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 131</p>	<p>The inclusion of Salusbury Road and commercial high street for the wider area will include attractive terraces and commercial and institutional buildings which contribute positively to the character and appearance and enhance the significance of the existing conservation area. Lonsdale Rd is an unusual survival of smaller scale terraces and workshops and a worthy inclusion to the conservation area which will clearly add to the interest and amenity of the area. We would however recommend that, in the event of designation, those buildings which do not contribute positively to the character and appearance, such as St Anne's Court, are identified as such in the event of any full update of the appraisal.</p>	<p>In support of the proposals. Its comments are noted about the buildings that do not contribute positively to the character and appearance of the conservation area. This, at a later stage, may be included in additional guidance.</p>
<b>Sudbury Cottages Conservation Area: de-designate</b>		
Resident	I support the de-designation of the Sudbury Cottages Conservation Area and the proposed reductions.	Supports the de-designation of Sudbury Cottages Conservation Area.
Resident	Support proposed extensions and/or new conservation areas, and the de-designation of the Sudbury Cottages Conservation Area.	Supports the de-designation of Sudbury Cottages Conservation Area.
Historic England (Statutory Consultee)	The proposal is to de-designate what is Brent's smallest conservation area. Designated to protect the special rural character of the historic core of Sudbury the report illustrates that there remains little rural character remaining in the area (the extent to which this could be	Supports the de-designation of Sudbury Cottages Conservation Area.

	considered to be identifiable at the time of designation is in itself noted as questionable). In our view, the remaining interest of the area is best illustrated by the existing national and local designations and the Tier 2 Archaeological Priority Area which now encompasses the wider area associated with Sudbury Court Manor. As such, have no objections to the proposal to de-designate this conservation area.	
<b>Willesden Green Conservation Area: extension to boundary</b>		
Resident	I live in the Willesden Green CA. Support all proposed amendments.	4 households support the extensions to the Willesden Green Conservation Area.
Resident	As the owner/resident in Dean Road for over 30 years I wish to convey my support of the proposals to make Dean Road and Brondesbury Park part of the conservation area. Having read the information on your website I feel the extension of the conservation area into the surrounding roads, rather than just the main road will very much enhance the area. Hopefully a larger conservation area will protect the character and history of this lovely area.	Resident supports the proposals to extend the Willesden Green Conservation Area.
Resident	I would like to express my concern about the proposal to include Dean Rad Willesden as a conservation area. I am opposed to this because there is no reason to include this road in a conservation area when it has historically not been included. It will make no difference as many of the properties have not preserved the original Victorian structure so far. This is completely unlawful what Brent is doing and I condemn the Brent Council for putting forward this proposal. This is simply a route for Brent to control the residents and it is entirely unnecessary. I do not believe that Brent truly has the interest of preserving the buildings but want to create further issues for residents and landlords. This will affect housing by creating a decline by inflicting unrequired red tape.	The best preserved of the streets, running parallel to Walm Lane (to the east), is Dean Road. The area was developed as part of the Willesden Park Estate. Although St. Pauls Avenue, Grove Road and Park Avenue have grand and substantial properties, it is Dean Road that survives very much intact and would be worthy of adding to the existing conservation area. Its tree lined street and attractive properties of high architectural quality are desirable for protection.
Resident	Willesden Green Conservation Area boundary review: I'm delighted the Willesden Green Conservation Area is going to be extended to include the named roads. This area has a rich heritage with many buildings of architectural interest, created in a characteristic style with building	Resident supports the proposals to extend the Willesden Green Conservation Area.

	<p>materials, windows, doors, roofing etc which are well-proportioned and of a unity. Sadly, there have been several alterations/extensions/demolitions &amp; rebuilds in this area which destroy the architectural quality and unity of the houses and debase the distinctive character of the area. Often these alterations are carried out by builders who appear to have no skills or training so the work is badly carried out, resulting in an ugly, ill-conceived dwelling bearing little resemblance to its original conception. The house on the corner of Brondesbury Park/Staverton Road once belonged to the Guinness family. It is a noble building but has been badly compromised by inappropriate extensions. The conservation area boundary should continue down the road to the library.</p>	
<p>Resident</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 133</p>	<p>I object to the extension to the Willesden Green Conservation Area along Brondesbury Park. Nothing has changed in the 22 years since I moved into the area. The current conservation area is clearly defined and makes sense. Right now, at a time when families are really struggling with the cost of living the additional cost burdens that living within a conservation area imposes eg the requirement for planning permission to change windows or to build an outbuilding. Most of the houses on the opposite side of the road from me are converted into flats and I expect that those people's financial circumstances have been even more affected by the current cost of living crisis.</p>	<p>Suburban residential development in Willesden Green continued north and south of the High Road. By 1914, town houses had also been constructed on the fields (south of Heathfield Park) belonging to Mount Pleasant Farm. The roads, Brondesbury Park and Staverton Road, had already been established and became lined with substantial town houses. The best preserved of these merit inclusion in the current conservation area. Conservation areas are designated for their distinctive character which can be one of the main draws for potential buyers.</p> <p>The planning controls placed over the area can help to preserve and manage the area's integrity and what makes it unique. This means there may be resistance to change that may damage the attractive qualities. Whilst the extra restrictions may seem limiting, they do not mean that change is prohibited within a conservation area. Restrictions are used to promote the local character and what's important about a place, resulting in better designed alterations, renovations and new development. Whilst not for everyone, living in a conservation area allows homeowners to be immersed in the distinctive character of a place and feel part of our nations heritage.</p>
<p>Historic England (Statutory Consultee)</p>	<p>As set out in the proposal document the proposed extensions encompass attractive, decorative, late Victorian housing and mansion blocks of similar quality to those already identified within Willesden and its neighbouring conservation areas. As such, the proposals appear justified and will enhance the existing character and appearance of the conservation area.</p>	<p>Supports the proposals.</p>

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 <b>Brent</b>	<b>Cabinet Decision</b> 28 May 2024
	<b>Report from the Corporate Director, Neighbourhoods &amp; Regeneration</b>
	<b>Lead Member - Cabinet Member for Environment &amp; Enforcement (Councillor Krupa Sheth)</b>
<b>Brent Active Travel Implementation Plan 2024-2029 – Final Version</b>	
<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>List of Appendices:</b>	Appendix A: Brent Active Travel Implementation Plan 2024 – 2029 – Final Version – April 2024 Appendix B: Brent Active Travel Implementation Plan 2024-2029 – Community Consultation Report – February 2024 Appendix C: Brent Active Travel Implementation Plan 2024-2029 - Equality Analysis – March 2024
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Tim Martin, Transportation Planning Manager Spatial Planning 020 8937 6134 <a href="mailto:Tim.Martin@brent.gov.uk">Tim.Martin@brent.gov.uk</a>

## 1.0 Executive Summary

1.1 This report provides an update on the development of the Brent Active Travel Implementation Plan 2024-2029 (ATIP), including details of the feedback received from the recent public consultation and stakeholder engagement exercises on the draft plan. It makes recommendations for a few minor additions/changes to be made to strengthen the plan prior to adoption.

## 2.0 Recommendation(s)

2.1 For Cabinet to agree:

- (i) to minor amendments to be made to strengthen the plan following consultation feedback. Details of the recommended plan additions/changes are set out in paragraph 3.4 of this report.

(ii) to adopt a final version of the Active Travel Implementation Plan incorporating these amendments (Appendix A to this report).

2.2 For Cabinet to note the feedback received and suggestions made by the public and various stakeholders as part of the recent public consultation and stakeholder engagement exercises on the draft plan, as set out in the Community Consultation Report attached at Appendix B to this report.

### **3.0 Detail**

#### **3.1 Cabinet Member Foreword**

3.1.1 The Brent Active Travel Implementation Plan 2024 – 2029 identifies the measures and interventions that will be prioritised by the Council and its partners to improve conditions for active travel in the borough and to enable more people to walk, wheel or cycle.

3.1.2 The plan responds to the challenges that many of our residents have told us they face by seeking to make active travel a meaningful and crucial element of people's daily journeys. It aims to address the barriers to active travel by making our streets safer and more inclusive for walking, wheeling and cycling; improving the quality and visibility of our pedestrian and cycle infrastructure; and equipping our communities with the confidence and means to walk, wheel and cycle. This, in turn, will enable us to create more sustainable, healthier and better-connected places where people aspire to live and work.

3.1.3 Over 650 people, from a wide range of locations, backgrounds and different age groups responded to a recent consultation on the plan, sharing their views and providing valuable feedback. We have listened carefully and some changes to the plan have been made as a result.

3.1.4 The Active Travel Implementation Plan aligns with the following Borough Plan priorities:

- Making the borough cleaner and greener,
- Establishing thriving communities, and
- Creating a healthier Brent.

3.1.5 The Borough Plan includes a commitment to removing the barriers people face to becoming physically active. This includes making our green spaces and walking and cycling routes more accessible, friendly, inclusive, and well-maintained; delivering enhanced active travel infrastructure; and designing out crime and anti-social behaviour.

3.1.6 The Active Travel Implementation Plan responds to the challenges that many of our residents have told us they face by seeking to make active travel a meaningful and crucial element of people's daily journeys. It aims to address the barriers to active travel by making our streets safer and more inclusive for walking and cycling; improving the quality and visibility of our walking and cycling infrastructure; and equipping our communities with the skills and means to walk and cycle. This, in turn, will enable us to create more sustainable, healthier and better-connected places where people aspire to live and work.

3.1.7 The plan also links to and aligns with the priorities and ambitions of several key Council plans and policies including:

- **Inclusive Growth Strategy:** Identifies the need for a range of important infrastructure improvements and supporting measures to be made including an improved public realm; the provision of secure and dry cycle parking; cycle lanes and pathways segregated from cars; loans for bicycle purchase and bicycle hire schemes; and travel strategies for schools and local workplaces.
- **Joint Health and Wellbeing Strategy:** Outlines how the creation of healthy places (including having safe, clean places in which to exercise) and helping people to stay healthy (including encouraging more physically activity) is key to addressing long-standing health inequalities in the borough and improving the health and wellbeing of Brent's residents. Increasing useable green spaces (e.g. through the creation of 'pocket parks') and improving access for people with a disability to places, parks and events are key strategy commitments.
- **Brent Local Plan:** With a focus on achieving 'good growth', the Plan requires new development to have good access to public transport and to reduce reliance on private cars; and new/improved walking and cycling routes to encourage more trips by active modes of travel. Policy BT1 (Sustainable Travel Choice) in particular sets out how the Council will prioritise active and sustainable travel over private motor vehicles.

## 3.2 Background

3.2.1 The Brent Active Travel Implementation Plan 2024 – 2029 (ATIP) outlines the measures and interventions that the Council and its partners are proposing to deliver over the next five years with the overarching aim of improving conditions for active travel in the borough and to enable more people to walk or cycle. The plan sits alongside the Brent Long Term Transport Strategy (LTTS) and supersedes the Brent Cycling Strategy 2016 and the Brent Walking Strategy 2017.

3.2.2 The Active Travel Implementation Plan comprises four main sections:

- Section 1 sets out what the plan is and why we need one - highlighting some of the main transport and related issues facing the borough and outlining how active travel can help address these. It also outlines how the plan has been developed and sets out the overarching vision for active travel in Brent.
- Section 2 provides an overview of the latest trends for walking and cycling in Brent, sets out our achievements to date and outlines the potential for and barriers to increasing levels of active travel in the borough. It concludes by setting out the overarching priorities for active travel going forward.
- Section 3 sets out the active travel delivery programme - the measures and actions required to address the various issues and challenges and to achieve the plan aims. It outlines how these could be funded and highlights the important role of a range of partners - including Brent's communities - in ensuring their successful delivery.

- The final section (Section 4) details the targets and indicators to be used to measure progress in delivering the plan and how it will be monitored and reviewed.

3.2.3 Permission to consult on a draft version of the plan was approved by the Cabinet Member for Environment, Infrastructure and Climate Action on 16<sup>th</sup> October 2023. An eight-week period of public consultation and wider stakeholder engagement was subsequently undertaken between 20<sup>th</sup> November 2023 and 14<sup>th</sup> January 2024. Details of the various public consultation and stakeholder engagement exercises undertaken, and the comments/feedback received from these, are set out below.

### **3.3 Draft Plan Public Consultation and Stakeholder Engagement Exercises**

3.3.1 The public consultation and stakeholder engagement on the draft plan comprised several strands, including an online questionnaire via Citizen Lab; face-to-face community outreach engagement undertaken by Kaizen Partnership; and conversations with a range of stakeholder organisations, including statutory stakeholders, partner organisations, community and interest groups.

3.3.2 A key aim of the various consultation exercises was to better understand what people thought of the plan and to hear what they considered to be the key issues and priorities going forward. Further details of the various consultation strands and the key findings from these are provided below.

#### ***Online Survey:***

3.3.3 An online survey was published on Citizen Lab, the Council's main consultation portal, with people invited to share their views on different aspects of the draft plan. The survey was widely publicised on the Council's website and social media, with details also circulated via Brent's various resident and stakeholder networks. 1,000 printed flyers were also distributed to various public facing Council offices and libraries with details of how to access the survey.

3.3.4 A total of 459 responses to the online survey were received, the majority from borough residents. In addition, a further four written responses from members of the public were submitted via email.

#### ***Outreach Engagement:***

3.3.5 Face-to-face public engagement was carried out by the specialist engagement company Kaizen over a two-week period in December 2023. This was carried out at seven separate locations across the borough and at different times of the day and on different days of the week (weekdays and weekends) to capture the views of as broad a range of people as possible. A total of 194 people gave their views via a series of one-to-one conversations.

3.3.6 A summary of the key findings to both the online and outreach engagement is set out below. Full details and analysis are set out in the Community Consultation Report at Appendix B to this report.

Survey/Outreach Questions	Headline Statistics
Who shared their views?	<ul style="list-style-type: none"> <li>• 657 people gave their views: <ul style="list-style-type: none"> <li>○ 194 people shared views in one-on-one conversations in the community</li> <li>○ 459 people gave their views by completing the online survey</li> <li>○ 4 people shared views via email</li> </ul> </li> <li>• 90% of people engaged via outreach said that their views had never been consulted before (76%) or not much before (15%).</li> <li>• 3 external stakeholder responses were received.</li> </ul>
Walking and cycling in Brent	<ul style="list-style-type: none"> <li>• 73% of respondents said they walk or cycle in the borough at least four times a week, with over half (55%) of those questioned stating that they walk or cycle in the borough every day.</li> <li>• Just under half of people (46%) consider Brent to be unfriendly or very unfriendly for walking and cycling as opposed to 40% who think it is friendly or very friendly. 28% of males consider the borough very unfriendly for active travel, compared to just 24% of females.</li> </ul>
Barriers to walking and cycling in Brent	<ul style="list-style-type: none"> <li>• Amongst the barriers to active travel that respondents feel should be given the highest priority by the Council to address include: <ul style="list-style-type: none"> <li>○ Poor-quality infrastructure for pedestrians (59%)</li> <li>○ Personal security concerns (54%)</li> <li>○ Lack of/poor quality cycling infrastructure (48%)</li> </ul> </li> <li>• Conversely, addressing lack of access to a cycle is viewed as a low priority or not a priority by over half (52%) of respondents.</li> </ul>
The vision and priorities for active travel	<ul style="list-style-type: none"> <li>• There is strong support for the overarching plan vision. Nearly three-quarters of respondents (73%) either agree or strongly agree with it, with people aged 25-44 being the most supportive.</li> <li>• There is also strong support for all three plan priorities. 75% of respondents either agree or strongly agree with Priority 1 (Make our streets safer and more inclusive for walking and cycling); whilst 73% either agree or strongly agree with Priority 2 (Improve the quality and visibility of our walking and cycle infrastructure). Priority 3 (Equip our communities with the confidence and means to walk and cycle), is marginally less popular, although 70% of respondents still either agree or strongly agree with it. Again, people aged 25-44 were the most supportive.</li> </ul>

Delivering improvements	<ul style="list-style-type: none"> <li>• There is a varying level of support for the interventions and actions proposed in the plan. The five highest priorities are: <ul style="list-style-type: none"> <li>○ Identify and prioritise for delivery new walking and cycling routes (52%)</li> <li>○ Work with school communities across Brent to trial new and innovative behaviour change initiatives (49%)</li> <li>○ Identify &amp; prioritise improvements to existing walking &amp; cycling network (47%)</li> <li>○ Develop a pipeline of road crossings and junction improvement schemes (46%)</li> <li>○ Expand active travel training to all secondary schools and other education establishments in Brent (46%)</li> </ul> </li> <li>• Amongst the interventions and actions that are seen as either a low priority or not a priority include: <ul style="list-style-type: none"> <li>○ Producing a business case for the introduction of more 20mph speed zones (44%)</li> <li>○ Working with TfL to secure the extension of the Santander Cycles scheme to Brent (43%)</li> <li>○ Establishing a borough-wide communications campaign highlighting the benefits of, and opportunities for, taking up walking and cycling (41%)</li> </ul> </li> </ul>
Priority areas for improvements	<ul style="list-style-type: none"> <li>• Around two-thirds of respondents (67%) agree that the Council should focus delivering active travel improvements in those priority locations identified in the plan. These include the borough's growth areas and major employment centres; key trip generators such as local health, shopping and leisure facilities; schools and other education facilities; public transport interchanges; local neighbourhoods; and Air Quality Focus Areas.</li> </ul>

**Stakeholder Conversations:**

3.3.7 Three external stakeholder groups responded to the consultation. They were:

- Transport for London
- Brent Cycling Campaign
- Sudbury Court Residents Association

3.3.8 All three groups provided a range of comments on different aspects of the ATIP. However, all were broadly supportive of the plan. A summary of the key issues raised is set out in the table below, with more detailed responses provided in the Community Consultation Report at Appendix B.

Stakeholder	Summary of Issues Raised/Key Priorities
Sudbury Court Residents Association	<ul style="list-style-type: none"> <li>• Have concerns around the design of the new footway crossovers - would like these to be flat to facilitate comfortable walking and wheeling.</li> <li>• Would like the Council to ban/enforce the trailing of EV charging cables across pavements.</li> </ul>
Brent Cycling Campaign	<ul style="list-style-type: none"> <li>• Supportive of the plan - identifies the many benefits of and barriers to active travel, whilst showing ambition for significantly increasing levels of active travel.</li> <li>• Would like to see reference to the following in the final version of the plan – wheeling; better representation of disabled people; use of parking revenue as a funding source for active travel; consideration of the impact of noise pollution; publication of regular updates on progress towards the targets; reference to the latest TfL Transport in London report and other sources.</li> </ul>
Transport for London	<ul style="list-style-type: none"> <li>• Suggest further reference be made to ensuring that walking/cycling infrastructure is safe at all times of day and that high-quality cycle parking is provided in new developments.</li> <li>• Consideration to be given to inclusion of a gender inclusive objective or mention of gender within interventions and to consult with women and girls on barriers to active travel.</li> <li>• Would like to see as much of the borough's roads made 20mph as possible and would welcome more engagement on this as a priority.</li> <li>• Support proposals for traffic signal improvements where these would result in journey time savings for sustainable modes.</li> <li>• Would welcome close collaboration on schemes to improve road crossings and junctions on the SRN/TLRN.</li> </ul>

### 3.4 Recommended Plan Additions and Changes

3.4.1 Feedback received from the various consultation and engagement exercises revealed a high level of support for the Active Travel Implementation Plan, including the overarching plan vision and priorities; and the range of measures, interventions and actions proposed in the delivery plan. As such, no major changes to the plan are proposed. However, to strengthen certain areas of the plan and to provide further clarity on some of our proposals; and to acknowledge those issues and priorities that are most important to our residents, it is recommended that a few minor additions/changes to the draft plan are made. These include:

- Providing a summary of the consultation results and how these have helped shape the final version of the plan.
- Highlighting the barriers to active travel faced by disabled people and how these can be addressed. Specific reference has been made around the

need to close the transport accessibility gap by making walking, wheeling and cycling accessible, safe and attractive for disabled people.

- Acknowledging the importance of having a safe environment for walking, wheeling and cycling at all times of day and night and making travel by these modes safer for women and girls. Specific reference has been made to undertaking women's safety audits when developing future transport and public realm improvement schemes in the borough.
- Outlining the need to create better walking, wheeling and cycling connections to and from our parks and open spaces as a means of helping tackle a deficiency in levels of access to these and to increase levels of active travel.
- Emphasising the need for safe, secure cycle parking to be provided in locations that are visible and close to cyclists' destinations and for high-quality cycle parking to be provided in new developments.
- Updating several graphs/charts to take account of latest available data from TfL and other organisations.

3.4.2 A final version of the Active Travel Implementation Plan incorporating these changes is attached at Appendix A to this report.

#### **4.0 Stakeholder and ward member consultation and engagement**

4.1 The eight-week consultation period included consultation and engagement with a range of stakeholder groups and the wider public as detailed in section 3.3, above.

4.2 Details of the consultation were provided via the Members Bulletin and several Members responded to the online consultation.

#### **5.0 Financial Considerations**

5.1 There are no direct financial implications arising from this report.

5.2 Details of the range of funding sources available to the Council for the delivery of the proposed measures and interventions in the Active Travel Implementation Plan is set out in Figure 3.8 in section 3 of the plan.

5.3 Costs associated with the development, publication and ongoing monitoring of the ATIP will be met through existing staff budgets.

#### **6.0 Legal Considerations**

6.1 There are no direct legal implications arising from this report.

6.2 As outlined in section 3.4, above, feedback received from the various consultation and engagement exercises has helped inform the development of the final version of the plan.

#### **7.0 Equity, Diversity & Inclusion (EDI) Considerations**



- 7.1 The public sector equality duty set out in Section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have due regard to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, and to advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not share that protected characteristic. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 7.2 An equalities assessment of the ATIP has been undertaken and is attached at Appendix C to this report. Overall, the plan is expected to have a positive impact on residents from various backgrounds. In particular, by promoting active travel options such as walking, wheeling, and cycling, the plan encourages a healthier lifestyle for local residents. Additionally, it fosters a sense of community by providing opportunities for people to interact and engage with their surroundings.
- 7.3 The plan may have some negative impacts on particular groups of users in specific areas. For example, measures aimed at reducing car dominance could adversely affect those with disabilities or elderly residents who rely on cars due to mobility issues. Where negative impacts have been identified, these will need to be addressed, or mitigated, where possible.

## **8.0 Climate Change and Environmental Considerations**

- 8.1 Supporting and encouraging active travel – in particular increased uptake of cycling and walking, is seen as key to helping resolve the climate emergency and addressing poor air quality. Amongst the key actions identified in the Brent Climate and Ecological Emergency Strategy and the Brent Air Quality Action Plan include plans for the introduction of Healthy (Low Traffic) Neighbourhoods; the creation of new school streets schemes; the delivery of bike hangars; and working with schools to develop sustainable travel plans. These and other similar interventions figure prominently in the Delivery Programme as set out in section 3 of the Active Travel Implementation Plan.

## **9.0 Human Resources/Property Considerations (if appropriate)**

- 9.1 None.

## **10.0 Communication Considerations**

- 10.1 None.

### **Related document(s) for reference**

[Brent Active Travel Implementation Plan 2024-29 - Draft Consultation Cabinet Member decision Report 16 October 23](#)

**Report sign off:**

***Alice Lester***

Corporate Director Neighbourhoods and Regeneration



# Brent Active Travel Implementation Plan 2024-2029

FINAL  
VERSION



April 2024

Page 145



<b>Foreword</b>	<b>3</b>
<b>Summary</b>	<b>4</b>
<hr/>	
<b>1: Introduction and Overview</b>	<b>7</b>
<b>What is the Brent Active Travel Implementation Plan 2024 - 2029?</b>	<b>7</b>
<b>Why do we need a plan?</b>	<b>8</b>
<b>What are the benefits of active travel?</b>	<b>9</b>
<b>How has the plan been developed?</b>	<b>11</b>
<b>What is the vision for active travel in Brent?</b>	<b>14</b>
<hr/>	
<b>2: Active Travel in Brent</b>	<b>15</b>
<b>What do we know about active travel in Brent?</b>	<b>15</b>
<b>What has been achieved so far?</b>	<b>23</b>
<b>What is the potential for increasing levels of active travel in Brent?</b>	<b>24</b>
<b>What are the main challenges we need to address?</b>	<b>25</b>
<b>What are the priorities for active travel in Brent?</b>	<b>26</b>
<hr/>	
<b>3: Delivering Improvements</b>	<b>28</b>
<b>Active travel delivery programme</b>	<b>28</b>
<b>Geographical priorities for delivery</b>	<b>50</b>
<b>Funding the delivery programme and prioritising spending</b>	<b>52</b>
<b>Implementing the delivery programme - involving Brent's communities and other partners</b>	<b>54</b>
<hr/>	
<b>4: Assessing Progress</b>	<b>55</b>
<b>Performance indicators and targets</b>	<b>55</b>
<b>Monitoring and review</b>	<b>56</b>
<hr/>	
<b>Appendix A: Summary table of key actions</b>	<b>57</b>

# Foreword

Brent should be well suited to walking, wheeling and cycling. It is a relatively flat, compact borough and many residents work, shop, learn and have fun within easy walking, wheeling or cycling distance of their homes. Despite this, the proportion of people travelling by active forms of transport in Brent, particularly cycling, does not always compare favourably with some parts of London.

It is well documented that walking, wheeling and cycling have multiple benefits for both individuals and society as a whole, particularly in terms of improving health and wellbeing, safety, the environment, the economy and promoting equality of opportunity. Recognising this, active travel is embedded in a wide range of the Council's plans and policies, covering not only transport but also planning, health, safety, climate change and air quality.

Much has been achieved in recent years to improve conditions for walking, wheeling and cycling and to encourage active travel in Brent. Since 2016 significant investment has been

made in new and improved pedestrian and cycle infrastructure, road safety improvements, community initiatives and promotional events in the borough. Whilst these interventions are undoubtedly encouraging more people to reconsider their travel options, we are aware that much remains to be done before walking, wheeling and cycling become the modes of choice for everyday journeys in Brent.

Informed by extensive consultation and engagement with our many diverse communities, the Brent Active Travel Implementation Plan 2024–2029 identifies the measures and interventions that will be prioritised by the Council and its partners to improve conditions for active travel in the borough and to enable more people to walk, wheel or cycle; and to contribute to meeting the overarching vision set out in the plan:

**To create an environment and culture in which walking, wheeling and cycling are safe, convenient, healthy and attractive options for everyone in Brent.**



**Cllr K Sheth**

Cabinet member for environment, infrastructure and climate action

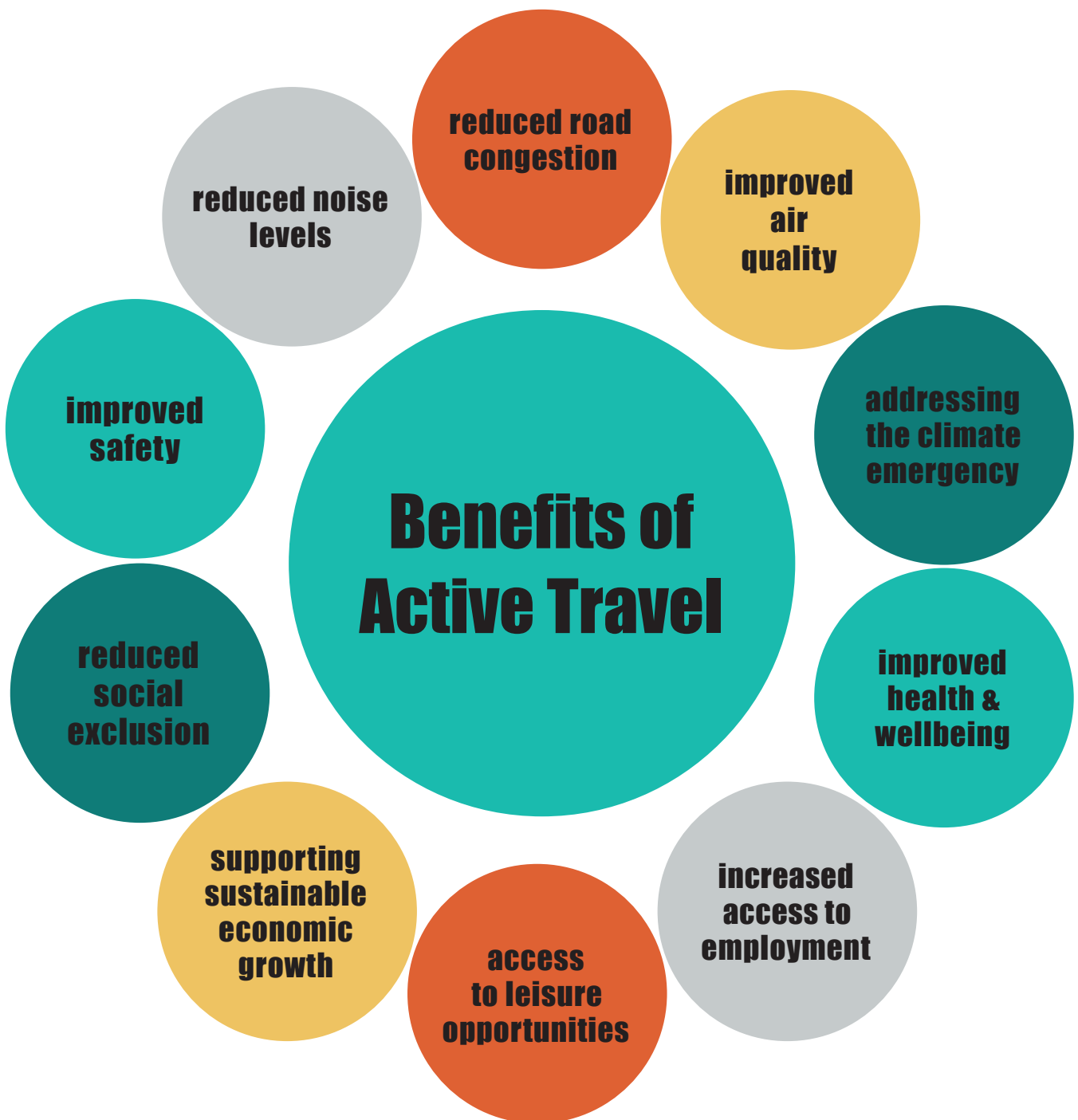
# Summary

## The plan – and why we need one

The Brent Active Travel Implementation Plan 2024 – 2029 sets out the vision to make active travel the natural first choice for everyday journeys and describes how we will increase walking, wheeling and cycling across Brent.

As we emerge further into a post-pandemic world, we need to ensure that Brent’s ongoing recovery is

green and inclusive. This includes working to address long-standing issues around congestion, poor air quality and road safety – which continue to blight some of our most vulnerable communities; whilst securing a healthier, more sustainable and more inclusive future for all those who live, work or visit the borough. Investing in healthy, active modes of travel, such as walking, wheeling and cycling, has a key role to play here.





## Active travel in Brent – current trends and future potential

Walking, wheeling and cycling currently account for around 40% of all trips in Brent – mirroring the figure for Greater London as a whole and above the average for outer London. Despite this, there is significant

potential to increase levels of active travel in the borough, with up to 60% of trips in outer London boroughs capable of being walked, wheeled or cycled. However, if this potential is to be realised, we need to address a number of barriers to everyday active travel.



## Our priorities and how we will achieve them

The plan responds to the challenges that many of our residents have told us they face by seeking to make active travel a meaningful and crucial element of people's daily journeys. It aims to address the barriers to active travel by making our streets safer and more inclusive for walking, wheeling and cycling; improving the quality and visibility

of our pedestrian and cycle infrastructure; and equipping our communities with the confidence and means to walk, wheel and cycle. This, in turn, will enable us to create more sustainable, healthier and better-connected places where people aspire to live and work.

To address the challenges we face and to create the step

change the borough and our communities need requires us to deliver the ambitious actions laid out in this plan. This includes striving to reduce car dominance and putting the needs of pedestrians and cyclists first; implementing walking, wheeling and cycling infrastructure that is fit for purpose and accessible to all; and providing our

residents with access to appropriate support, training and equipment. The Council will lead, but successful delivery will only be achieved by everyone playing their part – individual residents, community groups, businesses and a range of public and private organisations. The availability of funding will also be pivotal in the delivery of the plan.

## Plan vision and priorities

**To create an environment and culture in which walking, wheeling and cycling are safe, convenient, healthy and attractive options for everyone in Brent**

**1.**

**Make our streets safer and more inclusive for walking, wheeling and cycling**

Reduce motor vehicle dominance and put the needs of pedestrians and cyclists first

**2.**

**Improve the quality and visibility of our pedestrian and cycle infrastructure**

Implement walking, wheeling and cycling infrastructure that is fit for purpose and accessible to all

**3.**

**Equip our communities with the confidence and means to walk, wheel and cycle**

Provide our residents with access to appropriate support, training and equipment

## Assessing progress

As set out in the Brent Long Term Transport Strategy, the Council is committed to reducing overall traffic levels in the borough by a quarter and increasing significantly walking, cycling and public transport mode share. It also has a commitment to eliminate all deaths and serious injuries from road collisions and to achieve net zero CO2 emissions from road transport. The Brent Active Travel Implementation Plan has an important role to play in achieving these and a number of other key targets.

## What do we mean by active travel?

Active travel refers to modes of travel that involve a level of activity. The term is predominantly used interchangeably with walking and cycling but can also include trips made by wheelchair and mobility scooters (referred to as ‘wheeling’); and adapted cycles, e-cycles and cycle sharing schemes.

For this plan, we have adopted the following active travel definitions<sup>(1)</sup>:

- **Walking** - Foot/pedestrian-based mobility that may incorporate the support of aids to mobility such as stick/s, cane/s, crutch/es, the arm of another person and/or assistance animal/s.

- **Wheeling** - An equivalent alternative to foot/pedestrian-based mobility. Includes wheeled mobilities such as manual self- or assistant-propelled wheelchairs, including wheelchairs with power attachments or all-terrain attachments, powered wheelchairs, mobility scooters and rollators.
- **Cycling** - Incorporates the action of moving (at speed) on a wide range of pedal-powered wheeled transport that may be powered with hands and/or feet, may transport one or more persons, may or may not include e-assist, and may have from two to four wheels.



<sup>(1)</sup> Walking, Wheeling & Cycling Definitions, Wheeling Project, August 2023

# 1. Introduction and Overview

This first section sets out what the plan is and why we need one - highlighting some of the main transport and related issues facing the borough and outlining how active travel can help address these. It also outlines how the plan has been developed and sets out the overarching vision for active travel in Brent.

## What is the Brent Active Travel Implementation Plan 2024 - 2029?

The Brent Active Travel Implementation Plan 2024

- 2029 outlines the measures and interventions that the Council and its partners are committed to delivering over the next five years with the overarching aim of improving conditions for active travel in the borough and to enable more people to walk, wheel or cycle. The plan sits alongside the Brent Long Term Transport Strategy (LTTTS) and supersedes the Brent Cycling Strategy 2016 and the Brent Walking Strategy 2017.

Figure 1.1: Plan hierarchy



## Why do we need a plan?

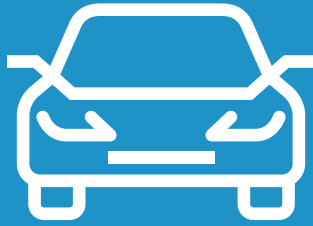
Since the publication of the cycling and walking strategies, a great deal has changed. The Council's declaration in 2019 of a climate emergency has brought all modes of sustainable transport to the forefront of our thinking, whilst the recent COVID-19 pandemic has impacted the way in which people

in the borough live, work and travel. Brent is also experiencing other challenges such as growing health and social inequalities; whilst longstanding issues around congestion, poor air quality and road safety remain to be addressed. Figure 1.2, below, outlines the main transport and linked challenges we face.

Figure 1.2: Borough transport and related challenges



**Health and Wellbeing:**  
Low levels of activity and high levels of obesity amongst parts of the population



**Congestion:**  
High and rising traffic levels - exacerbated by high levels of car dependency



**Pollution:**  
Large parts of the borough suffer from problems of poor air quality due to vehicle emissions



**Climate Change:**  
Levels of carbon emissions from transport remain high in comparison to other sectors

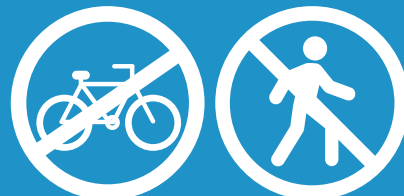
# Transport and Linked Challenges in Brent



**Road Safety:**  
High number of pedestrian and cyclist casualties on the transport network



**Crime and Fear of Crime:**  
Safety and security issues resulting from poorly designed/maintained places



**Connectivity:**  
Fragmented nature of cycling and walking links and severance caused by road/rail infrastructure



## What are the benefits of active travel?

Increasing levels of walking, wheeling and cycling can help tackle some of the key challenges we face as a borough – improving air quality, combatting climate change, improving health and wellbeing and addressing inequalities. A focus on active travel will

also help us to create places in which people want to live and work – with better connected, healthier and more sustainable communities – as well as helping boost economic growth in Brent. Figure 1.3, below, summarises some of the main benefits of active travel.



Figure 1.3: Active travel benefits

### HEALTH

Physical inactivity costs the NHS up to **£1bn per annum**, with further indirect costs calculated at **£8.2bn**



### WELLBEING

**20 minutes** of exercise per day cuts risk of developing depression by **31%** and increases productivity of workers



### CONGESTION



The new east-west and north-south cycle routes in London are moving **46% of the people** in only **30% of the road space**

### LOCAL BUSINESSES



Up to **46% increase** in shopping footfall by well-planned improvements in the walking environment

### ENVIRONMENTAL AND AIR QUALITY



Meeting the targets to double cycling and increase walking would lead to savings of **£567 million** annually from our air quality alone and prevent **8,300 premature deaths** each year and provide opportunities to improve green spaces and biodiversity

### CLIMATE CHANGE



Mode shift to active transport is one of the most cost-effective ways of reducing transport emissions

### ECONOMY



Cycling contributes **£5.4bn to the economy** per year and supports **64,000 jobs**



## Improving the health and wellbeing of our residents through active travel

Physical activity, like walking, wheeling and cycling can help to prevent and manage over 20 chronic conditions and diseases, including some cancers, heart disease, type 2 diabetes and depression. Physical inactivity is responsible for one in six UK deaths (equal to smoking) and is estimated to cost the UK £7.4 billion annually (including £0.9 billion to the NHS alone) (2).

Poor health and high levels of inactivity are two of the major challenges facing a large number of

Brent's residents. The borough is ranked as the fourth most deprived local authority in London and in 2016 it was named as the fattest London borough. Currently, around 55% of Brent's adult population (aged 18+) are classified as overweight or obese, whilst almost one in three children are classed as obese by the time they leave primary school – way above the London and England average (3). Supporting more of our residents to walk, wheel and cycle will be key to helping them live healthier lives.



### How has the plan been developed?

The plan has been informed by extensive and ongoing engagement with Brent's diverse communities, as well as wider feedback received as part of recent consultations – including the Borough Plan, the LTTS

and the Brent Active Travel Programme. This has helped ensure that it reflects the genuine needs and desires of those who live and work in the borough and will contribute to bringing about real and lasting change.

(2) Gear change: a bold vision for cycling and walking, DfT 2020

(3) Joint Health and Wellbeing Strategy 2022–2027, Health and Wellbeing Board 2022

## Shaping the plan – consultation and engagement

An eight-week period of public consultation and wider stakeholder engagement was undertaken on a draft version of the plan between 20 November 2023 and 14 January 2024, with the aim of ascertaining what people thought of the plan and to hear what they considered to be the key issues and priorities going forward.

Over 650 people, from a wide range of locations, backgrounds and different age groups responded to an online survey or took part in a series of community engagement sessions, sharing their views and providing valuable feedback. Several stakeholder organisations – including TfL and the Brent Cycling Campaign also responded to the consultation.

### What people said...

Feedback received from the various consultation and engagement exercises has revealed a high level of support for the plan, including the overarching vision and priorities and the various interventions and actions. The main findings are as follows:

### Walking, wheeling and cycling in Brent and the barriers to these –

- 46% of those questioned consider Brent to be unfriendly for walking, wheeling and cycling. This compares to 40% who think it is friendly for travel by these modes.
- Among the main barriers to active travel that respondents highlight include poor-quality pedestrian infrastructure – in particular uneven

surfaces and poorly maintained pavements; and a lack of/poor quality cycling infrastructure – with the lack of secure cycle storage being of particular concern. Other barriers to safe and enjoyable walking, wheeling and cycling highlighted include personal security concerns – particularly when travelling at night; and high levels of traffic and poor driver behaviour.

### Plan vision, priorities, interventions and actions –

- There is strong support for the overarching plan vision. Nearly three-quarters of respondents (73%) either agree or strongly agree with it, with people aged 25–44 being the most supportive. There is also strong support for all three plan priorities – over 70% of respondents stating that they either agree or strongly agree with them.
- There are varying levels of support for the interventions and actions proposed in the plan. Among the highest priorities include a need to identify and prioritise improvements to the existing active travel network – such as better cycle lanes, more secure cycle parking and traffic calming measures; and for the delivery of new walking, wheeling and cycling routes – with a particular focus on creating a network of green corridors and safe routes through parks. A recurring theme is the need for personal safety and security improvements, with many respondents emphasising the importance of addressing street crime and cycle theft. Ensuring Brent's streets are kept clean and well maintained is also an important priority.





## Shaping the plan – consultation and engagement

- Around two-thirds of respondents (67%) agree that the Council should focus delivering active travel improvements in those priority locations identified in the plan (see Geographical priorities for delivery, page 50). There is a particular call to prioritise residential areas and those parts of the borough experiencing high levels of congestion and pollution; and to improve connectivity between our major town centres.

### Other areas for improvements –

- The responses make clear the need for the Council to improve road safety; better maintain infrastructure; and provide high-quality and more visible facilities before walking, wheeling and cycling become the modes of choice for everyday journeys in Brent. Other important priorities highlighted include the imperative to make active travel accessible, safe and attractive for women and girls and disabled people.

Whilst some respondents advocate the need to take a more radical approach to address the various issues, others call for a more balanced approach that considers the needs of all residents – including those who rely on cars for transportation.

### ...and how we have listened

Our primary aim is to improve conditions for active travel in the borough and to enable more people to walk, wheel and cycle. To this end, all comments and suggestions received from the various consultation and engagement exercises have been considered carefully and some changes to the plan have been made as a result. These include acknowledging those issues and priorities that are most important to our residents; and changing the emphasis of, or providing further clarity on, some of our proposals and projects.





## What is the vision for active travel in Brent?

The overarching aim is to create conditions where walking, wheeling and cycling become a viable choice for more people in Brent, in turn helping to ensure a safer, greener borough where people are healthier and can access a wide range of opportunities easily.

To achieve this will require us to make our streets safer and more inclusive for walking, wheeling and cycling; deliver significant improvements to our pedestrian and cycle infrastructure; and provide more targeted support for those wishing to walk, wheel and cycle more.



## 2. Active Travel in Brent

This section outlines the latest trends for walking, wheeling and cycling in Brent, sets out our achievements to date and highlights the potential for increasing levels of active travel in the borough. It also details the barriers that currently stop more people from walking, wheeling and cycling that will need to be addressed. The section concludes by setting out the overarching priorities for active travel in Brent going forward.

### What do we know about active travel in Brent?

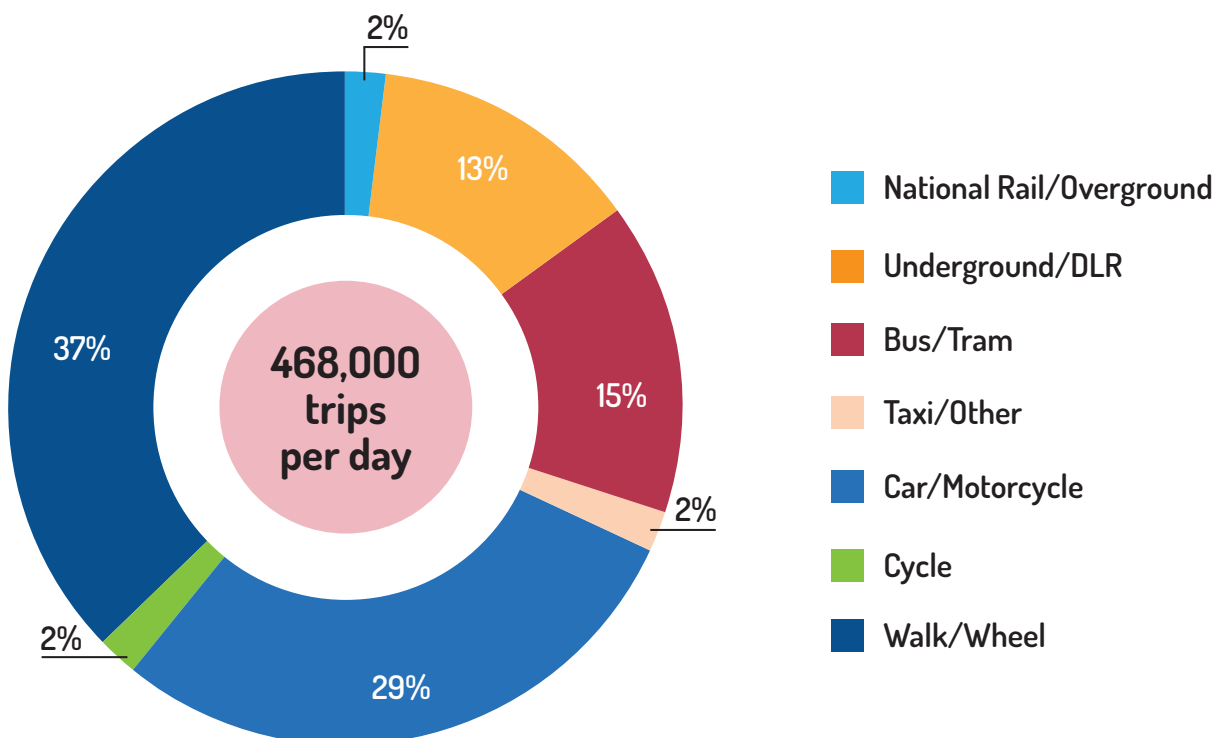
- **How many people are walking, wheeling and cycling?**

Walking and wheeling currently account for around 40% of all trips in London (4). However, there are significant variations across the Capital. For example, whilst walking and wheeling are the most common

form of transport in central and inner London (52% of all trips made), in outer London walking is less common – accounting for just 34% of trips made. There are currently around 173,000 walking and wheeling trips made every day in Brent – representing about 37% of all daily trips in the borough (see Figure 2.1).

While cycling remains a relatively smaller mode in the London context, it has seen strong growth in the last couple of decades, with a resurgence since the COVID-19 pandemic following a few years of slower growth immediately before (5). Cycling mode share in Brent is currently 2.3% – equating to around 11,000 cycling trips per day. Whilst this is below the figure for central and inner London (4.9%), it is above the average for outer London (see Figure 2.2).

**Figure 2.1: Mode share of trips in Brent (average daily trips 2022/23)**



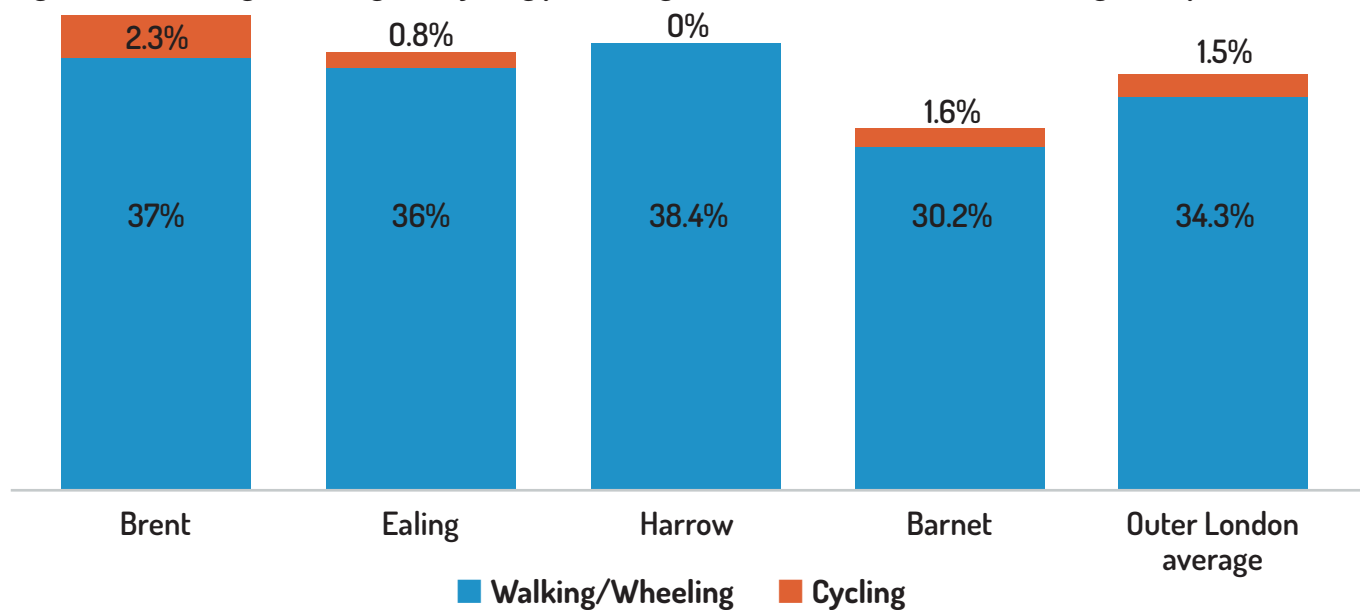
Source: London Travel Demand Survey 2022/23, TfL

(4) London Travel Demand Survey 2022/23, TfL

(5) London Travel Demand Survey 2022/23, TfL



Figure 2.2: Walking, wheeling and cycling percentage mode share (2022-23) – borough comparison



Source: London Travel Demand Survey 2022/23, TfL

## Active travel and the pandemic

The recent COVID-19 pandemic profoundly impacted the way in which people lived, worked and travelled as evidenced by the public’s desire to be more active, and the rise in popularity of walking, wheeling and cycling.

Data from TfL indicates that walking and wheeling accounted for almost 60% of all trips made by London residents during restriction-affected January-March 2021 and typically more than 40% during other periods of the pandemic. This compares to 35% before the pandemic. Most of these walking and wheeling trips were local trips in inner and outer London. The latest available data shows that the walking and wheeling mode share for London residents was 40% – lower than the pandemic average, but still higher than representative pre-pandemic values (6).

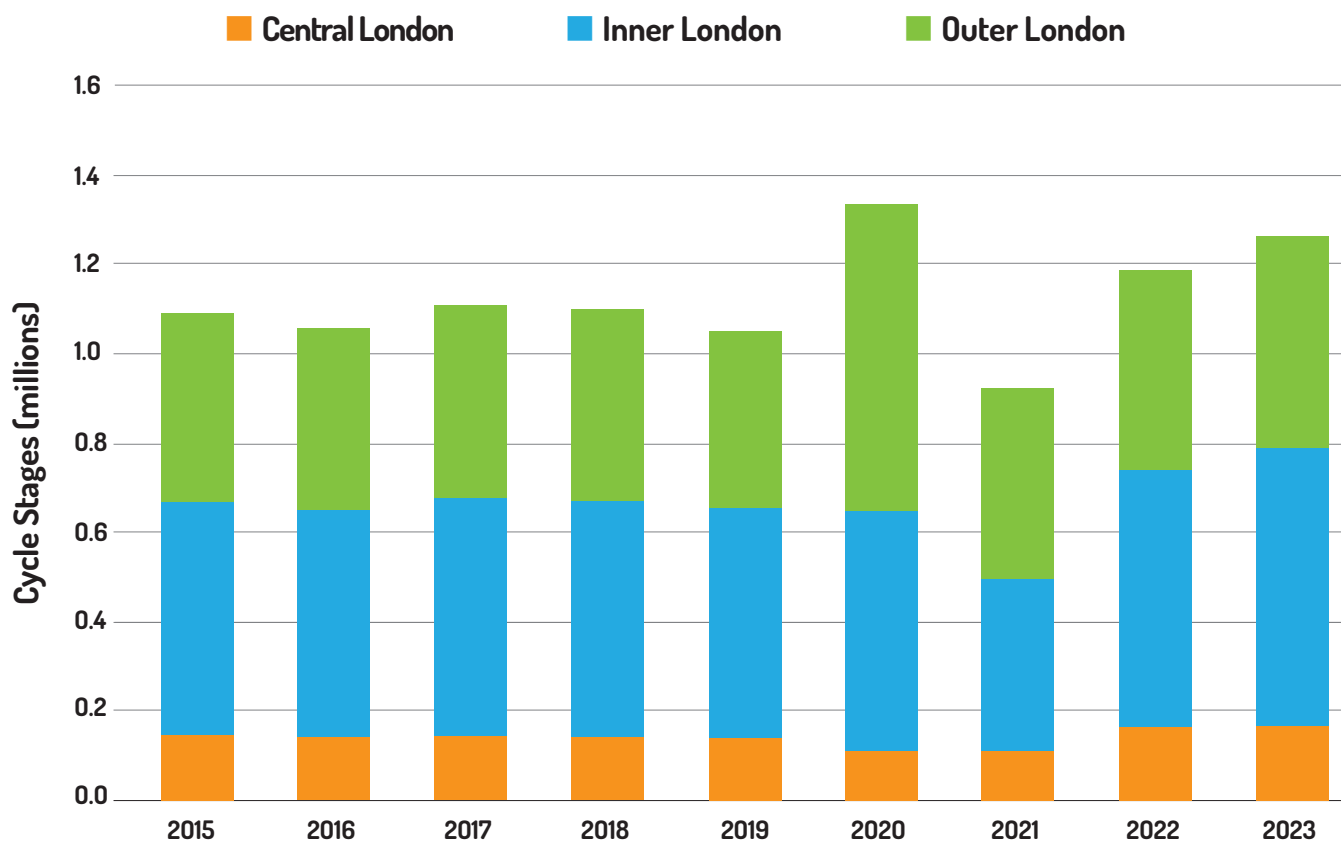
A similar picture emerges for levels of cycling. According to TfL data, the overall impact of the pandemic was to boost cycling, particularly at weekends. The latest available data confirms that post-pandemic cycling levels in spring 2022 were firmly above the pre-pandemic baseline, with weekday cycle kilometres travelled in London 22% higher in 2023 compared to 2019 (see Figure 2.3, below). The highest growth was seen in central London, followed by inner and outer London.



(6) Travel in London 2023, TfL



Figure 2.3: Daily cycle stages in London by area, seven-day week average



Source: Travel in London 2023, TfL

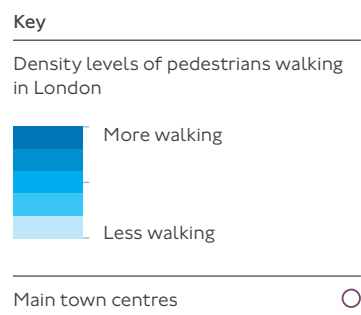
• **Where are people walking, wheeling and cycling and for what purpose?**

Figure 2.4 shows those areas of London with the highest levels of walking and wheeling activity. In general, people living in the more densely built-up urban areas of central and inner London and those

with good access to public transport are more likely to walk and wheel. Where building densities are lower, such as in the more suburban areas in outer London, and where public transport is generally less available, people are often more reliant on cars to get around.



Figure 2.4: Walking levels in London



Source: Walking Action Plan, TFL 2018





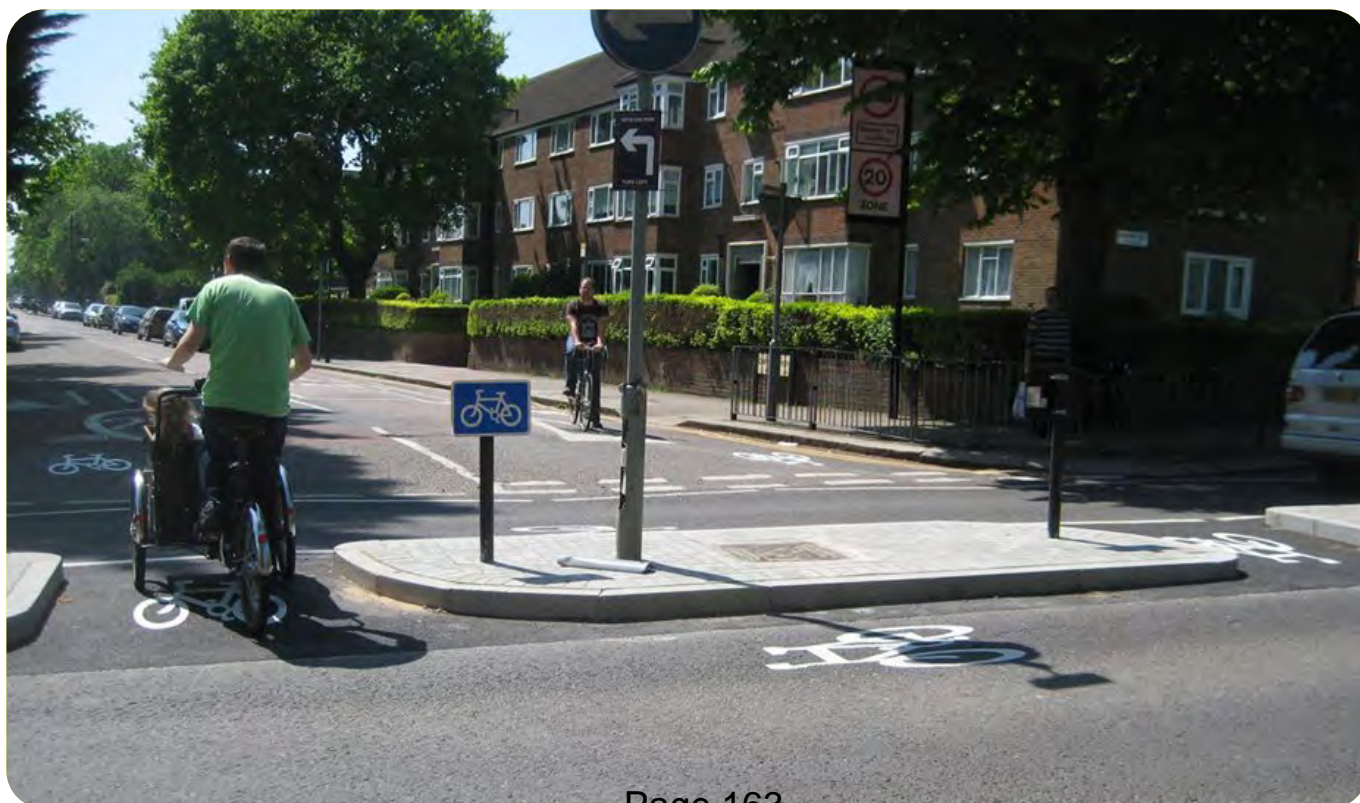
Figure 2.5 shows the busiest areas for cycling in London in recent years, based on TfL monitoring and modelling data. The areas with the highest levels

of cycling are in central and inner London, with comparatively busier routes for cycling than in most outer London boroughs.

**Figure 2.5: Cycling levels in London**



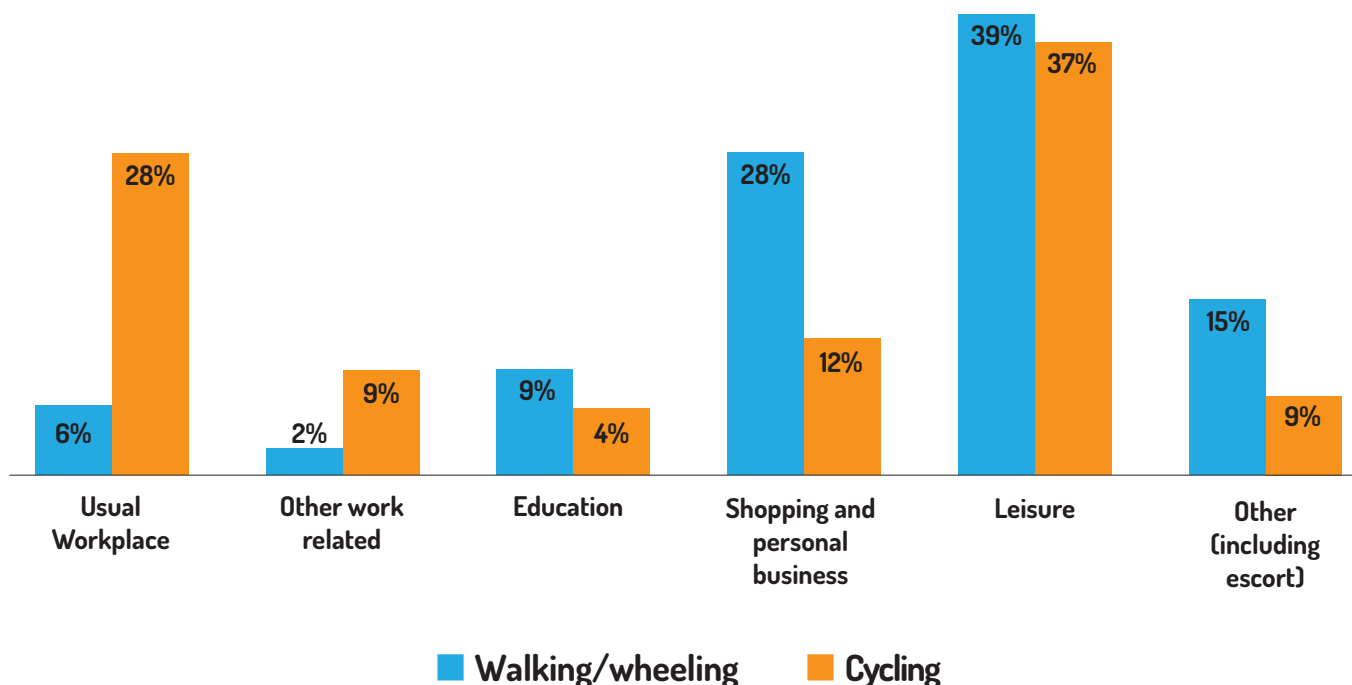
Source: Cycling Action Plan, TfL 2018



Data collected by TfL through the London Travel Demand Survey (LTDS) indicates that around two-thirds of walking and wheeling trips in London (67%) are made for leisure or shopping purposes (see Figure 2.6, below), with just 17% of trips made for work or

education purposes. By contrast, 41% of cycling trips are undertaken for the purpose of work or education, with just under half (49%) being made for leisure or shopping purposes.

**Figure 2.6: Purpose of walking, wheeling and cycle trips (LTDS 2022/23)**



Source: Travel in London 2023, TfL

• **Who is walking, wheeling and cycling?**

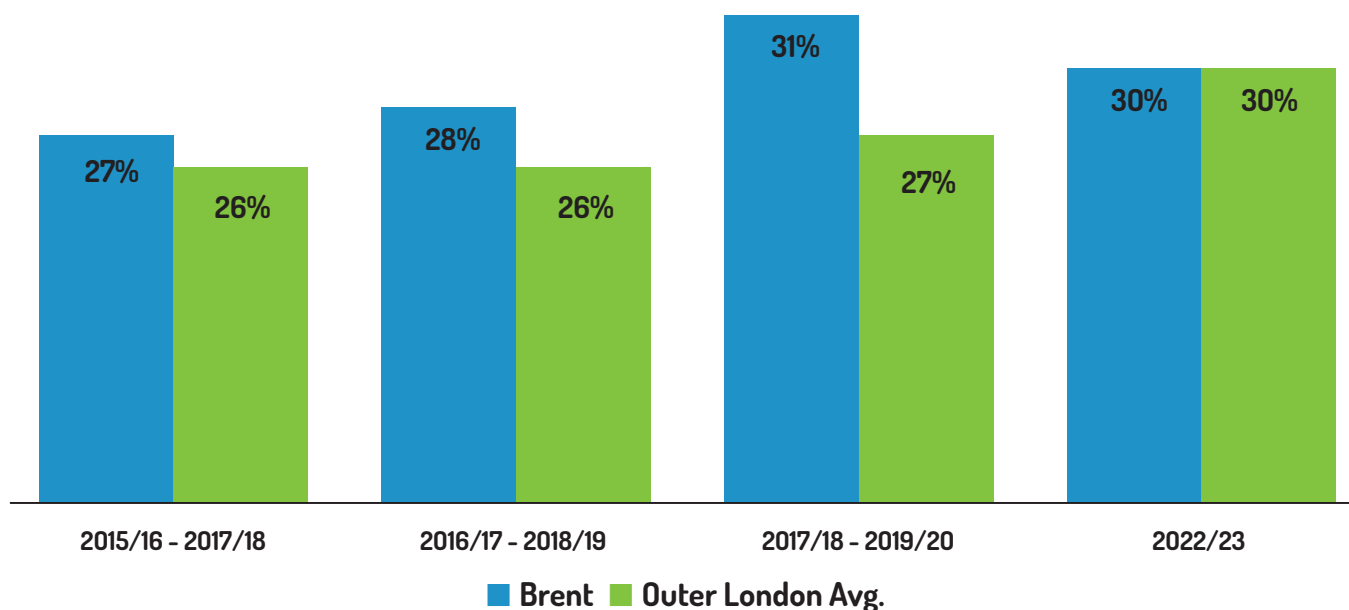
Evidence suggests that young adults in London are more likely to travel actively. In 2022/23, 41% of residents aged between 20 and 39 achieved the recommended physical activity target of 20 minutes a day through active travel. This falls to 32% of residents aged 60-79 and just 18% of residents aged 80 and over (7). It is recommended that children do a minimum of one hour of physical activity each day.

Currently eight out of 10 children in London do not achieve this.

The most recent data from TfL indicates that around 30% of Brent residents are doing the recommended 20 minutes of active travel a day – up from 27% in 2015/16 – 2017/18. This is on a par with the outer London average (see Figure 2.7).

(7) Travel in London 2023, TfL

Figure 2.7: Percentage of Brent residents doing at least two x10 minutes of active travel a day

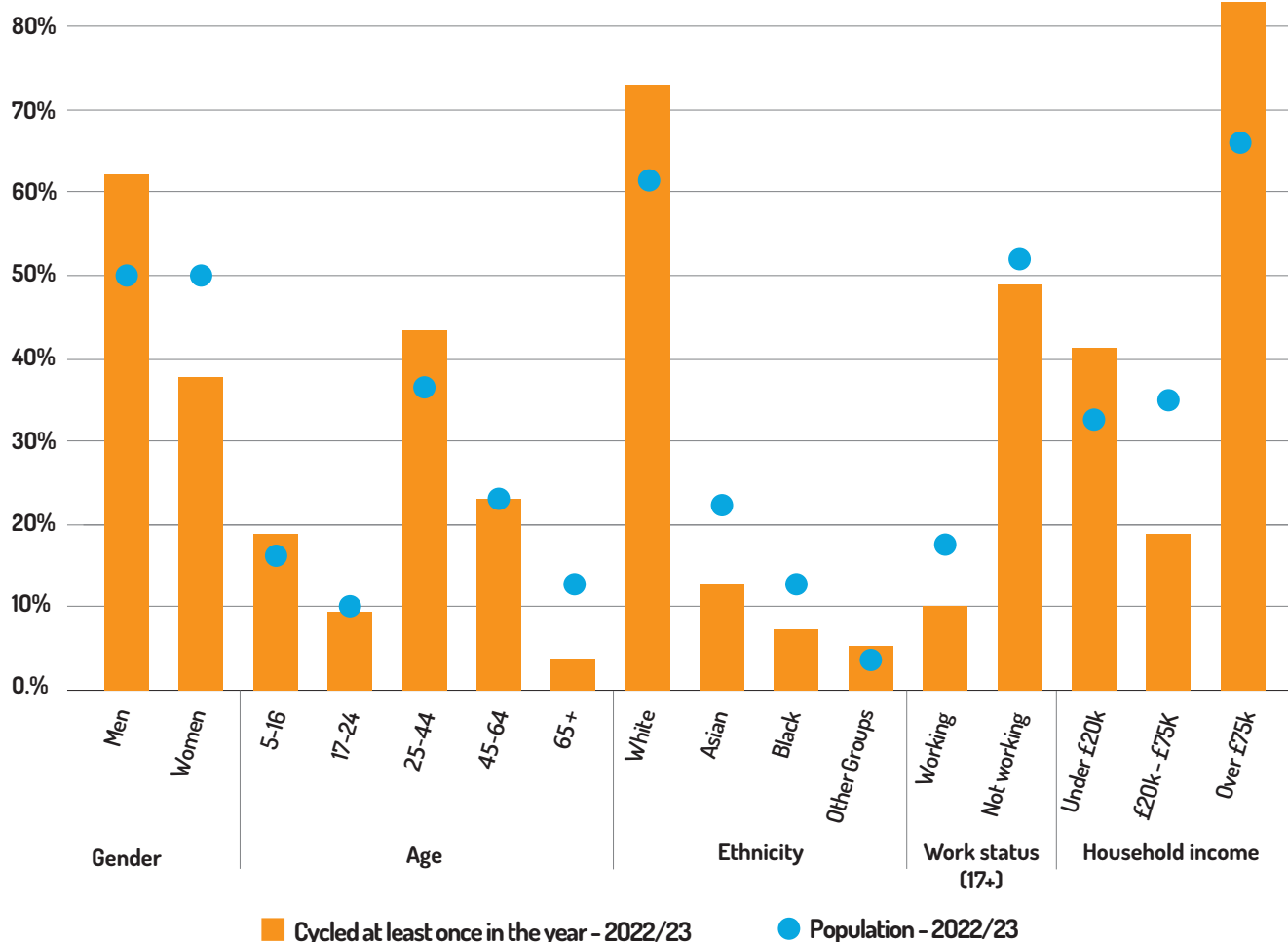


Source: London Travel Demand Survey 2022/23, TfL

Data from TfL also reveals that the barriers to active travel are particularly acute for groups who are currently under-represented, such as women and ethnic minority groups. In particular, there is under-representation in several groups and over-

representation in a smaller number of groups where cycling is most prevalent, these being particularly men, people of White ethnicity, and those in employment (see Figure 2.8).

Figure 2.8: Socio-demographic profile of London residents who cycle (LTDS 2022/23)



Source: Travel in London 2023, TfL



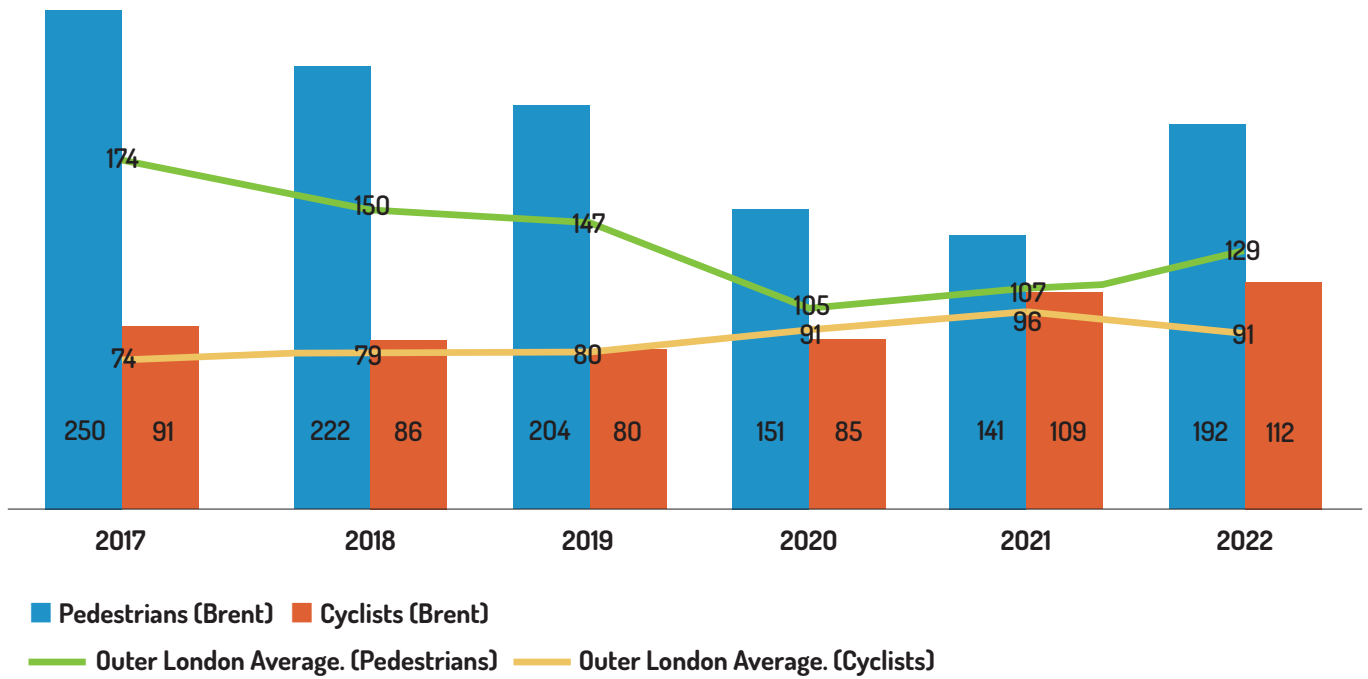
● **Other important trends?**

Data from TfL indicates that there has been a fall in the number of reported pedestrian casualties in the borough over recent years (down 23% between 2017 and 2022). These trends are mirrored across London as a whole (8).

Whilst there has been a significant decrease in the

risk of being killed or seriously injured while cycling in Brent since 2000, showing the positive impact of investment in infrastructure and other measures to reduce road danger over this time, the number of cyclist casualties has increased by 40% over the last few years (see Figure 2.9). This needs to be addressed, and there is still more to do to make cycling safer in Brent.

**Figure 2.9: Pedestrian and cyclist casualties in Brent**



Source: Casualties in Greater London 2022, TfL





## What has been achieved so far?

The Council and its partners have been working hard to improve conditions for active travel in the borough by delivering critical improvements to transport infrastructure; raising awareness of the various benefits of walking, wheeling and cycling; and providing support and training for people looking to change their travel behaviour. Notable achievements since 2016 include:

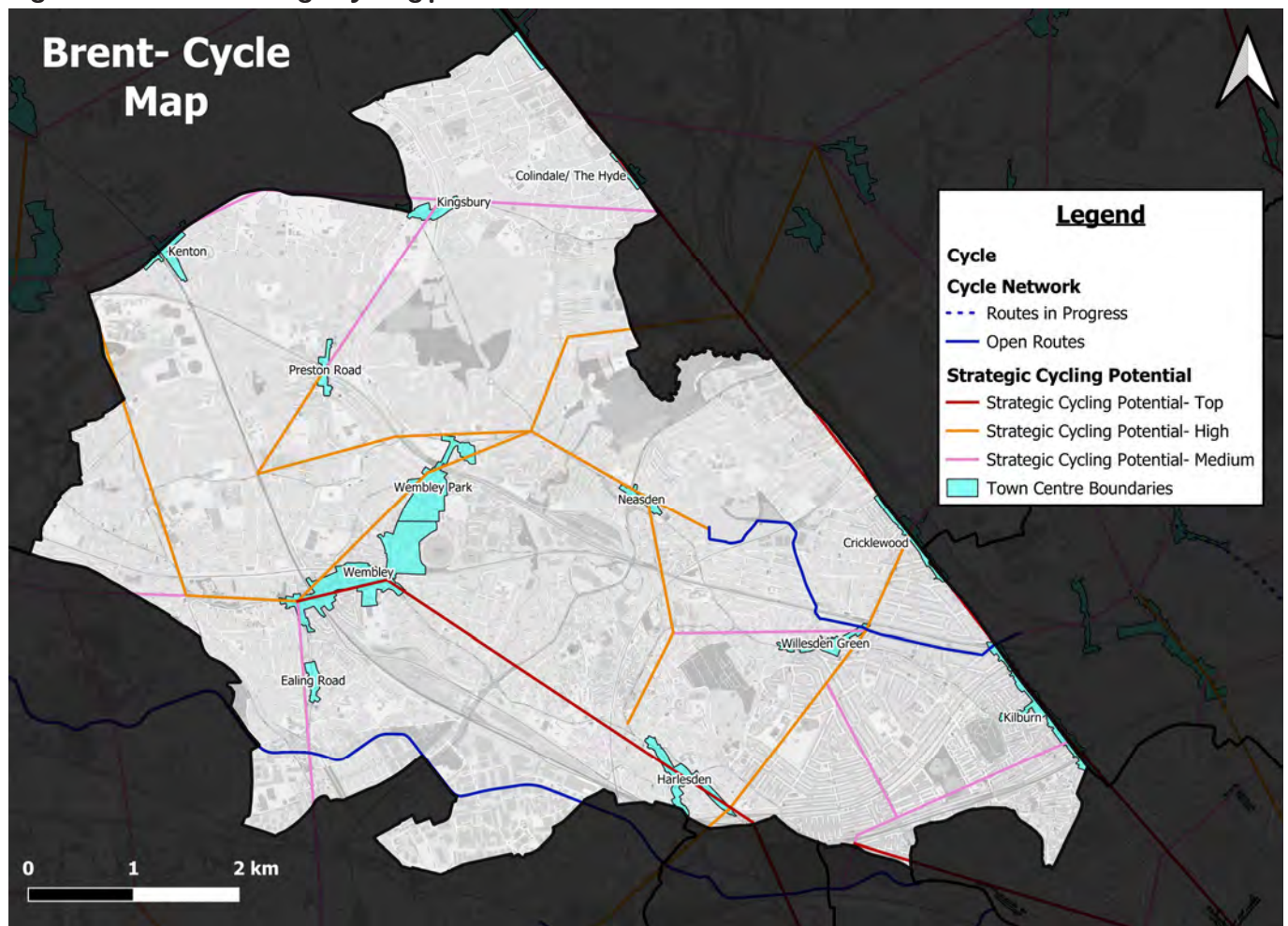
- Implementing around 6km of new cycle routes, including the Brent section of Quietway Cycle Route 3 from Kilburn to Gladstone Park; a semi-segregated cycle route in Carlton Vale; and new segregated cycle facilities in Kingsbury town centre.
- Removing the historic bylaw prohibiting cycling in the borough's parks.
- Installing nearly 1,000 new public on-street and residential cycle parking spaces, including 180 Sheffield Stands and 104 Bike Hangers.
- Launching a 'dockless' cycle hire scheme managed by the transport/shared mobility company Lime. Operating with 500 e-bikes located across the borough, the scheme currently has over 100,000 users in Brent and has generated over 500,000 local cycling trips since operations began in 2019.
- Providing new/improved pedestrian wayfinding - including Legible London signage in town centres, at stations and other key visitor attractions across the borough. Pedestrian wayfinding signs have also been installed in many of our parks and open spaces.
- Undertaking street audits and footway decluttering as part of comprehensive town centre improvements in Kingsbury, Wembley, Church End and Kilburn.
- Developing a Road Safety Analysis & Action Plan which identifies priority locations for road safety/speed reduction measures in the borough.
- Providing cycle training for over 2,800 adults and around 11,500 school pupils since 2017. We have also hosted over 120 Dr Bike sessions in this period and helped set up a number of adult bike clubs. Through an informal partnership with Joyriders we have also delivered a number of events/cycle rides predominantly for Muslim women.
- Delivering over 12,000 events and activities as part of the Bike It programme between 2018 and 2020, engaging around 30,000 pupils in more than 30 schools. This resulted in a doubling in the number of pupils cycling to school every day at several schools.
- Working with schools in the borough to develop travel plans to promote active travel as part of the daily journey to school. There are currently 42 primary schools with active travel plans in place - 27 of which have achieved gold accreditation.
- Participating in the Sustrans led 'Big Pedal Competition' and, more recently, the 'Big Walk and Wheel Challenge' as a means of encouraging pupils to walk, cycle and scoot to school. We also partnered Cambridge University in a study with schools to highlight benefits of walking to school and improvements that could be made along routes.
- Hosting an annual Car Free Day event at different locations across the borough to promote walking, wheeling and cycling; as well as providing regular messaging and running campaigns about the benefits of active travel. We have also hosted a series of webinars which examined the barriers to cycling and how these might be addressed.
- In partnership with the Public Health team delivering a range of walking, wheeling and cycling initiatives, including several 'Cycle on Prescription' programmes; establishing weekly 'Walk for Health' walks; and providing support to a number of community organisations to set up local cycling groups.
- Establishing a 'Try Before you Bike' scheme, enabling residents to pay monthly to try out a range of bikes (including children's, hybrid, folding bikes, e-bikes and e-cargo bikes) without a commitment to purchase, with cycle training provided.

## What is the potential for increasing levels of active travel in Brent?

There is significant potential to increase levels of walking, wheeling and cycling in Brent. Data from TfL indicates that, every day, Londoners make around 1.5 million short trips by car, taxi or bus that could be walked or wheeled instead (9). In contrast, there are more than eight million journeys by car, taxi, Tube and bus that could potentially be switched to cycling instead (10).

Outer London has the greatest walking, wheeling and cycling potential. More than 60% of all walkable or wheelable trips made in London every day by car, bus or taxi are made in outer London (11). Similarly, 55% of all journeys that could be cycled take place entirely within outer London (12). Figure 2.10, below, shows those areas of Brent with the highest strategic cycling potential.

**Figure 2.10: Brent strategic cycling potential**



Source: Strategic Cycling Analysis, TfL 2018

- (9) Walking Action Plan, TfL 2018
- (10) Cycling Action Plan, TfL 2018
- (11) Walking Action Plan, TfL 2018
- (12) Cycling Action Plan, TfL 2018





## What are the main challenges we need to address?

Despite our achievements to date, it is clear more still needs to be done if we are to realise the potential for increased levels of walking, wheeling and cycling in Brent. As outlined in Section 1, amongst the key barriers that we will need to address include:

- Poor infrastructure – including a lack of safe cycling facilities, poor quality cycle routes and a lack of secure cycle parking;
- A lack of safe crossing facilities;
- Narrow and cluttered footways;
- Volume and speed of road traffic and its perceived priority over active travel modes which often result in unsafe conditions for walking, wheeling and cycling;

- Poor/inconsiderate driving behaviour, with a lack of respect shown to people walking, wheeling and cycling. Pavement parking is a commonly cited issue;
- Personal security concerns – especially amongst women and young people.

Other common barriers to active travel often mentioned include concerns over air pollution, lack of access to a cycle, and a perceived lack of fitness. There is also a view amongst certain groups that walking and cycling are seen as ‘low status’ activities, with some people actively aspiring to own and drive a car. Addressing these ‘attitudinal’ barriers will also be an important consideration.





## What are the priorities for active travel in Brent?

Our main priorities for active travel are outlined below. Informed, in part, by the challenges and opportunities identified above, and to build on our achievements to date, they are predicated on reducing car dominance and putting the needs of pedestrians and cyclists first; delivering walking, wheeling and cycle infrastructure that is fit for purpose and accessible to all; and providing our residents with access to appropriate support, high-quality training and equipment.

### 1. Make our streets safer and more inclusive for walking, wheeling and cycling

Research shows people are often deterred from walking, wheeling and cycling by too much traffic and traffic travelling too fast, as well as by safety and personal security concerns and a view that streets need to be more pedestrian and cycle friendly. With a focus on all aspects of planning and decision-making, we will ensure our streets and places are better designed, with less and slower traffic and greater priority given to people walking, wheeling and cycling to overcome these barriers.

### 2. Improve the quality and visibility of our pedestrian and cycle infrastructure

As well as improving street environments for pedestrians and cyclists, providing high-quality and more visible walking, wheeling and cycling infrastructure will also be vital to enabling more people to travel by active modes of transport. To this end, we will commit to implementing a clearly

defined, joined-up network of active travel routes and rolling out other infrastructure improvements that will make walking, wheeling and cycling in Brent safe, convenient and attractive options for more people.

### 3. Equip our communities with the confidence and means to walk, wheel and cycle

Appealing pedestrian and cycling environments and high-quality infrastructure are required to enable more people to walk and cycle. However, giving people the confidence and motivation to walk and wheel and the skills and means to cycle are equally important. To complement the planned physical improvements, we will put in place a comprehensive programme of support, advice, training and community events with the aim of raising the profile of and removing the socio-economic barriers to active travel.

The plan priorities have also been formulated having regard to – and to ensure consistency with – the aims and objectives in the LTTs and other key borough plans and strategies, including the Borough Plan, the Climate and Ecological Emergency Strategy, the Joint Health and Wellbeing Strategy and the Air Quality Action Plan. We have also sought to align the plan with the objectives and priorities outlined in key national and mayoral plans, including the Cycling and Walking Plan for England, the Mayor of London's Transport Strategy and TfL's Walking and Cycling Action Plans (see Figure 2.11, on next page). The valuable feedback received from various local consultation and engagement exercises has also played an important part in shaping these priorities.



**Figure 2.11: Wider policy considerations**

National Plans/Strategies	Key Themes/Priorities
<ul style="list-style-type: none"> <li>• Inclusive Transport Strategy</li> <li>• Clean Air Strategy</li> <li>• Cycling and Walking Plan for England</li> <li>• Transport Decarbonisation Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Providing better journey planning information</li> <li>• Improving local walking and cycle links</li> <li>• Creating inclusive/easy to use streetscapes</li> <li>• Providing better cycle parking facilities</li> <li>• Embracing e-cycles and other technologies</li> </ul>
Mayoral Plans/Policies	Key Themes/Priorities
<ul style="list-style-type: none"> <li>• London Plan</li> <li>• Mayor’s Transport Strategy</li> <li>• London Environment Strategy</li> <li>• London Health Inequalities Strategy</li> <li>• Economic Development Strategy for London</li> <li>• Walking Action Plan</li> <li>• Cycling Action Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Creating ‘Healthy Streets’ that encourage walking and cycling</li> <li>• Securing investment in new walking and cycle infrastructure and street environments</li> <li>• Creating a comprehensive London-wide cycle network</li> <li>• Addressing severance and reducing road danger</li> <li>• Increasing levels of daily activity</li> <li>• Planning new developments around walking and cycling for local trips</li> <li>• Integrating walking with public transport</li> <li>• Supporting a culture change</li> <li>• Increasing cycle parking and cycle training</li> </ul>
Borough Plans/Policies	Key Themes/Priorities
<ul style="list-style-type: none"> <li>• Borough Plan</li> <li>• Brent Local Plan</li> <li>• Long Term Transport Strategy Review</li> <li>• Inclusive Growth Strategy</li> <li>• Climate and Ecological Emergency Strategy</li> <li>• Air Quality Action Plan</li> <li>• Joint Health and Wellbeing Strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Making walking and cycling infrastructure safer, more accessible, friendly, inclusive, and well-maintained</li> <li>• Securing new/improved walking and cycling routes</li> <li>• Implementing targeted road safety improvements</li> <li>• Providing secure cycle parking facilities</li> <li>• Developing travel plans for schools/workplaces</li> <li>• Implementing Healthy (Low Traffic) Neighbourhoods and School Streets</li> <li>• Creating useable green and healthy spaces</li> <li>• Improving access for people with a disability</li> </ul>



## 3. Delivering Improvements

This section outlines the measures and actions required to address the various issues and challenges and to achieve the overarching plan aims. Details of how these interventions could be funded and the timescales for delivery are also set out. In addition, we also highlight the important role of Brent's communities in ensuring the successful delivery of the plan proposals.

### Active travel delivery programme

The delivery programme sets out the measures and interventions the Council and its partners are proposing to implement as a means of addressing the issues and challenges identified above and to achieve an improved culture and environment for – and to increase levels of – active travel in Brent. The various measures are set out under the three main priority

headings and include a list of key actions that the Council will commit to undertake.

### 1. Make our streets safer and more inclusive for walking, wheeling and cycling

Ensuring our streets and places are better designed, with less and slower traffic and priority given to people walking, wheeling and cycling is key to overcoming the barriers to active travel in Brent. Making it easier for those less able to get around is also an important consideration. The main delivery programme measures we are proposing that will help achieve this are outlined below – with 'Healthy Streets' and 'Vision Zero' embedded at the heart of our decision-making.

## Adopting the Healthy Streets Approach to improve the walking, wheeling and cycling experience in Brent

The Healthy Streets Approach puts active travel at the centre of the planning process. It focuses on creating streets and places that are pleasant, safe and attractive, where noise, air pollution, accessibility and lack of seating and shelter are not barriers that prevent people, particularly the most vulnerable, from getting out and about (see Figure 3.1, below).

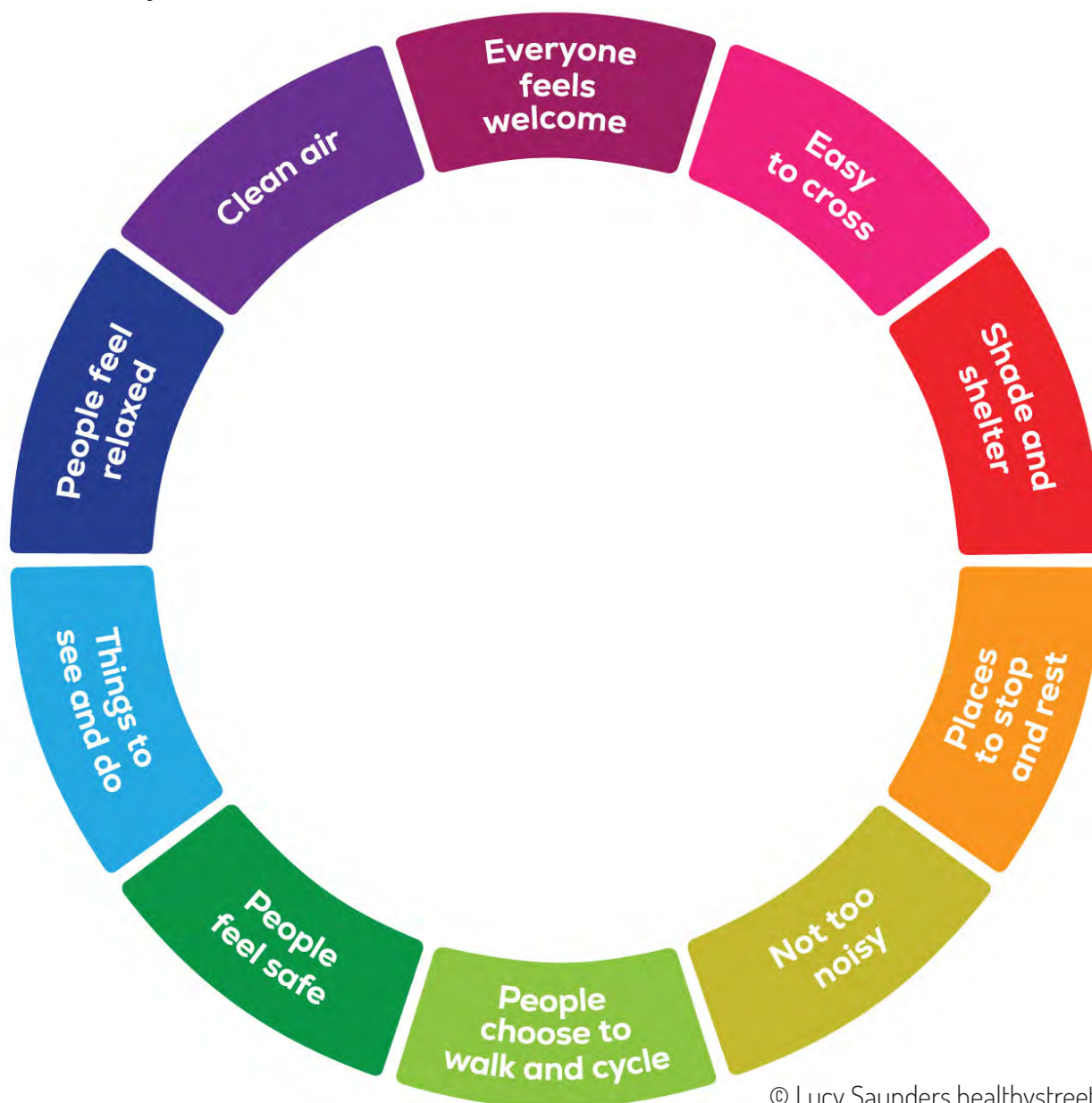
By embedding the Healthy Streets Approach at the heart of our decision-making, we will improve the walking, wheeling and cycling experience in Brent. At a street level, this will mean investing in infrastructure and the urban realm to provide safe, clean and attractive environments for people walking, wheeling and cycling. At a network level, we will need to design and manage our streets, places and wider transport system to build active travel into every journey. As Brent continues to grow, we also need to design active travel into new developments and regeneration projects so that walking, wheeling and cycling are convenient and attractive options.

Working closely with developers and our

contractors, we will mandate that TfL's Healthy Streets Check for Designers is applied to all transport and development schemes where changes to the street layout are expected to significantly affect the experience of people walking, wheeling and cycling.



Figure 3.1: Healthy Streets Indicators



© Lucy Saunders healthystreets.com

- **Create streets and places that prioritise people walking, wheeling and cycling**

Our ambition is to transform Brent's streets and neighbourhoods to reshape the landscape for active travel, with the identification and implementation of projects which will make it easier and safer to walk, wheel and cycle, as well as reduce pollution and create exemplar places. A key focus is on creating streets and places that prioritise pedestrians and cyclists and which are not dominated by motorised vehicles.

Through our Healthy Streets and Places programme (see below) we will identify and deliver improvements to our main town and district centres, forecourt areas

around stations and other key trip generators such as schools, hospitals and visitor attractions. A priority for the delivery of comprehensive walking, wheeling and cycling improvements will be those areas forming part of our Green Neighbourhoods initiative and those parts of the borough designated as an Air Quality Focus Area.

As a first step, we will review and prioritise the implementation of schemes identified in the 2020 Active Travel Consultation (see below), followed by the identification and development of a pipeline of more comprehensive schemes to be implemented in future years.



## 2020 Active Travel Consultation

In summer 2020, the Council launched a consultation exercise via the Commonplace platform to monitor and map feedback and requests from residents for specific improvements to active travel infrastructure in the borough. Over 600 people responded and amongst the most common issues raised were poor infrastructure – including a lack of safe cycling facilities and poor-quality cycle routes; a lack of safe crossing facilities for pedestrians and narrow and cluttered footways; and the volume and speed of road traffic and inconsiderate driving behaviour.

To address these issues, respondents suggested they would like to see more and better walking, wheeling and cycle infrastructure – particularly more crossing facilities and joined-up, continuous

and linked routes; and further measures to manage and reduce motor traffic – including introducing lower vehicle speed limits and restricting through traffic on residential roads. A large proportion of respondents stated that they would also like to see less vehicle parking and tighter restrictions on pavement parking.

Following the consultation exercise, an initial review identified a package of ‘quick win’ interventions to be taken forward for delivery under TfL’s London Streetspace Plan during the Covid pandemic. A further review is now proposed to inform a pipeline of more comprehensive schemes to be implemented in future years through the LIP and other transport programmes.



**KEY ACTION: 1**  
**Review and prioritise the implementation**  
**of schemes identified in the 2020 Active Travel Consultation.**

## Brent Healthy Streets and Places

Our Healthy Streets and Places programme seeks to build on our existing LIP funded corridors and neighbourhoods improvements programme, with the aim of improving people's health and wellbeing and facilitating social inclusion. The focus is on delivering comprehensive, 'high impact' schemes, implemented over wider areas to address multiple issues and bring about a greater range of benefits to more people.

Guided by TfL's 'Healthy Streets' and 'Vision Zero' principles and developed and implemented in partnership with a variety of stakeholders, schemes will seek to reduce the dominance of traffic; prioritise pedestrians, cyclists and other vulnerable road users; and enhance the quality, resilience and general accessibility of the wider

public realm in the areas in which they are implemented.

As experts in their area, local communities hold the keys to change and schemes will be underpinned by community-led street design. Interventions will vary from area to area, depending on the types of issues faced and level of support from residents and other stakeholders, but will include a mix of infrastructure improvements backed up with behaviour change programmes. Typical measures might include traffic-calming/reduction measures; new pedestrian and cycle facilities; and environmental and place-making improvements - and supported with cycle training and walking /wheeling group programmes for adults and children.



## Quick Win

Measures such as street trials are a great way of showing people the potential of their local streets and public spaces for uses other than moving cars. As such, we will support the introduction of

temporary, light-touch and low-cost projects that seek to reduce car dominance and make space for walking, wheeling and cycling, and to act as catalysts for more permanent changes in the future.



- **Make our streets safer for pedestrians and cyclists**

One of the most important actions that can be taken to make our streets safer and ensure people feel safe when walking, wheeling and cycling is lowering

speeds. A key priority for the Council is the roll-out of further 'School Streets' schemes (see below) across the borough to make roads outside schools safer for pupils and to cut local air pollution.

**KEY ACTION: 2**

**Facilitate the roll-out of new and expanded School Streets schemes prioritising 'high risk' locations in terms of road safety and exposure to poor air quality.**

## Brent School Streets

In 2020, the council began the roll-out of emergency School Streets at 30 schools across the borough to bring about a reduction in cars around school gates and to help families social distance during the Covid-19 pandemic.

Delivered in partnership with TfL and the borough's schools, the Schools Streets programme aims to make the roads safer for pupils and to cut local air pollution. In discouraging car use, the Council also hopes to encourage more people to walk, wheel and cycle as part of their daily routine.

Schools in Church End, Cricklewood, Harlesden, Neasden and Stonebridge are among the locations where School Streets have been introduced.

Locations were selected on the basis of a number of criteria, including road safety issues; exposure to poor air quality; and where support was needed to enable social distancing. Schemes were introduced as temporary measures using an experimental traffic order and following a recent review, many of these schemes have now been made permanent.



The Brent LTTS includes a commitment to explore the implementation of more 20mph speed zones across the borough. As a first step, we will produce a business case for the introduction of these, informed by the latest road safety data which, if feasible,

could be rolled-out during the lifetime of this plan. We will also explore the potential for introducing a borough-wide 20mph speed limit similar to those implemented in other parts of London.

**KEY ACTION: 3**

**Produce a business case for the introduction of more 20mph speed zones for possible implementation during the lifetime of this plan.**

In 2021 the Council commissioned a Road Safety Analysis study which highlighted that vulnerable road users, such as pedestrians, cyclists and powered two-wheelers, are the most likely user group to be killed or seriously injured, with a high proportion of serious and fatal collisions occurring at road crossings and junctions in the borough.

Through our 'Safer Streets and Places' programme, we will take action to reduce road danger on our

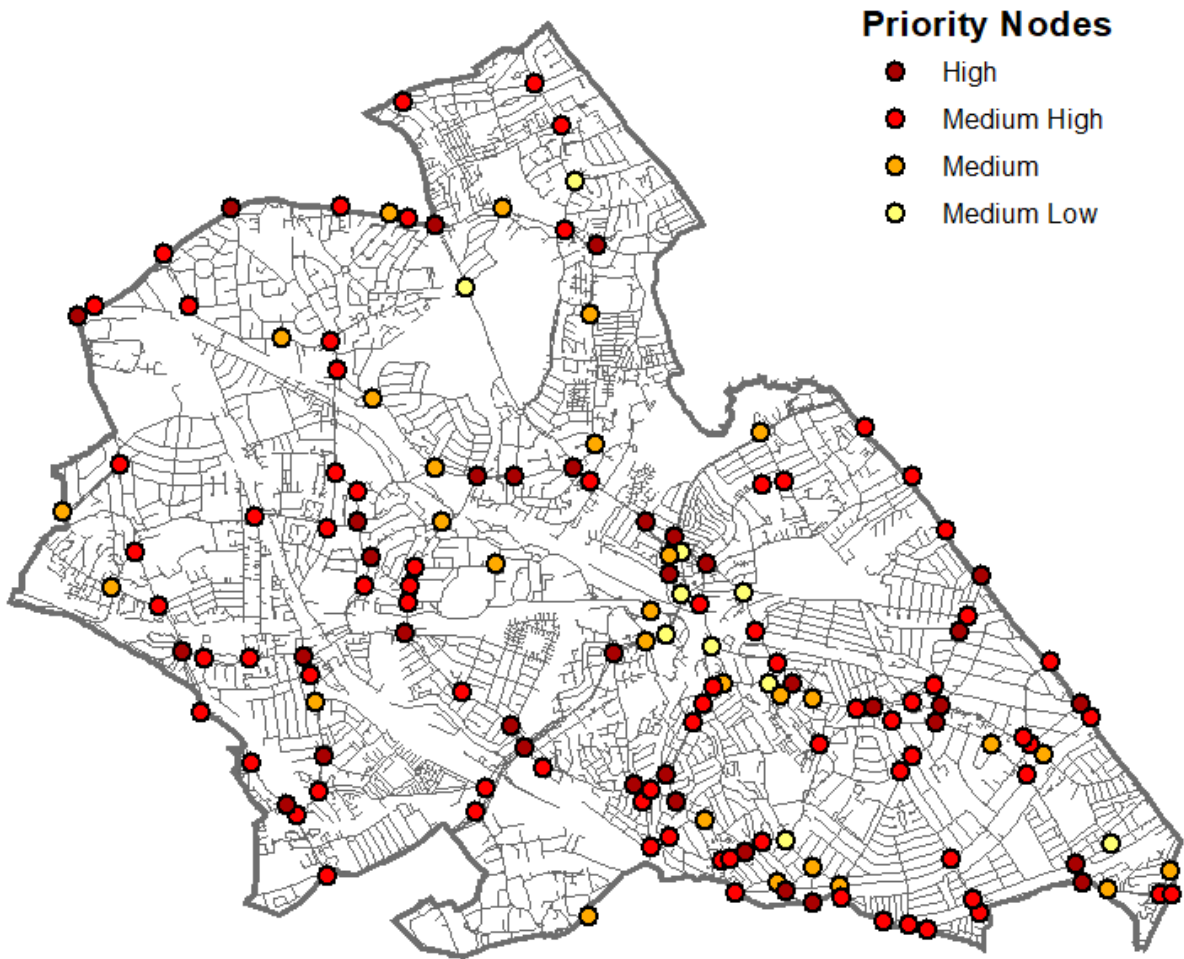
network, prioritising those 'high-risk' locations identified in the study. We are currently implementing improvements to several key junctions, including at Wembley Park Drive/Wembley Hill Road/Park Lane and Kenton Road/Woodcock Hill and are developing proposals for several others, including the busy Northwick Park roundabout and the Neasden gyratories (see below). Subject to funding, our aim is to deliver improvements to all 'high' priority junctions identified in the study (see Figure 3.3, below).



**KEY ACTION: 4**

**Develop a pipeline of road crossing and junction improvement schemes for delivery under our Safer Streets and Places programme**

Figure 3.3: Priority locations for road safety interventions



# Neasden Town Centre Connectivity and Placemaking Strategy

Neasden is a strategically important town centre located at the heart of Brent and situated close to a number of major growth areas. However, the area suffers from a range of problems, including long-standing transport, environmental and connectivity issues. These stem, in part, from the presence of the busy North Circular Road (NCR) and connecting road network, which separates the town centre from its residential hinterland and is a major source of congestion and pollution.



To address these issues, the Council is developing a Connectivity and Placemaking Strategy for the town centre and its environs. Among the key priorities include a need to address the severance caused by the major road network; improve public transport, cycling and walking connectivity; and to enhance the town centre and the surrounding urban environment.

As a first step to achieving this and to maximise opportunities for wider regeneration in the area, the Council has identified a package of highways and place making interventions which it is looking to develop further. Amongst the measures currently undergoing design and feasibility work include the reconfiguration of parts of the local road network to improve pedestrian, cyclist and driver safety; the construction of a new crossing over the NCR and new/improved connections to the town centre; and the rationalisation of the town centre bus and servicing routes.

## Quick Win

The Council has a range of tools at its disposal to achieve slow traffic speeds and reduce the effect of traffic. These include physical measures – such as traffic filtering, ‘pocket parks’, and play streets; and behaviour change programmes – including

targeted enforcement, publicity and marketing campaigns. We will look at introducing more of these measures and initiatives as a means of making our streets safer for pedestrians and cyclists.

- **Enhance the accessibility and inclusiveness of our streets**

Street layouts should be intuitive and accessible for all people, comfortable and safe for use throughout the day and at night. However, crowded and obstructed streets, narrow footways and cycle lanes, and damaged or poorly maintained roads and pavements are among the most common complaints cited by people walking, wheeling and cycling. Such issues are often magnified when experienced by those with disabilities (see below).

In line with our LTTS objective to create healthier, more resilient and more welcoming streets and neighbourhoods, we will explore opportunities to improve the accessibility and inclusiveness of our streets for those walking, wheeling and cycling, including:

- Reviewing arrangements around pavement parking – one of the most common complaints made by people walking and wheeling.
- Removing sources of pavement clutter and footway obstructions such as redundant signage, telephone kiosks, utility boxes, advertisement boards and unlicensed retail stands and al-fresco dining areas.
- Strengthening arrangements around where and how dockless bikes are parked in the borough to address issues around inconsiderate and unsafe cycle parking.
- Implementing timely carriageway and footway repairs and resurfacing, placing a greater focus on those areas with the highest levels of people walking and cycling.



## Closing the transport accessibility gap

Disabled people face greater barriers to travel than non-disabled people. In the UK, disabled people take 38% fewer trips (across all modes of transport) than non-disabled people (13), an outcome which is reflected in walking, wheeling and cycling trip data too. This is known as the transport accessibility gap.

A key reason for this transport accessibility gap is that streets are often inaccessible and unsafe for

disabled people to navigate on foot, by wheel or by cycle. This can stop disabled people accessing what they need in their communities – such as healthcare, food, work, education, culture and green space.

Making walking, wheeling and cycling accessible, safe and attractive for disabled people is a critical part of closing the gap between how disabled and non-disabled people live and move.



## KEY ACTION: 5

**Introduce more formal parking arrangements for dockless bikes operating in the borough, prioritising key trip generators and those areas with high levels of pedestrian activity.**

- **Optimise the management of our streets and neighbourhoods**

Well-managed streets help people walk, wheel and cycle safely, swiftly and directly, while at the same time keeping traffic moving and reducing congestion. This can be achieved in many ways, although one of the quickest and least costly solutions involves reviewing the timings at traffic signals.

TfL has responsibility for all London's traffic signals and undertakes annual timing reviews at signal junctions and crossings. Through this work, they have managed to reduce the wait times for people walking, wheeling and cycling at crossing locations

across the borough.

We will work closely with TfL to identify more locations in Brent where alterations to signal timings can be made to improve journey times for pedestrians and cyclists, with a focus on locations close to schools, hospitals, transport hubs and other key trip generators in the borough. We will also work with TfL to identify locations in the borough where innovative traffic signal control technologies, such as SCOOT (Split Cycle Offset Optimisation Technique) and 'green man' authority can be implemented to further improve people's walking, wheeling and cycling experience.

## KEY ACTION: 6

**Identify and prioritise for delivery a programme of traffic signal improvements to enhance journey times for pedestrians and cyclists, with a focus on key trip generators across the borough.**

### 2. Improve the quality and visibility of our pedestrian and cycle infrastructure

To make walking, wheeling and cycling safe, convenient and attractive options for more people in Brent will require the provision of new well-connected and accessible active travel routes linking key parts of the borough, as well as improvements to our existing pedestrian and cycle infrastructure. Action to improve cycle parking, wayfinding and address severance across the walking, wheeling and cycling network will also be needed. Making it easier to interchange between active modes and public transport for longer journeys is also an important consideration. Details of the specific measures and interventions proposed are set out below.

- **Improve our existing pedestrian and cycle infrastructure**

At the core of our ambition for walking, wheeling and cycling in Brent is the creation of a borough-wide active travel network, comprising high-quality, well-connected walking, wheeling and cycling routes and supporting infrastructure.

As a first stage to developing this, the Council is

currently undertaking a review of the existing active travel network in the borough in order to understand what provision is currently made for pedestrians and cyclists; the quality of those routes (i.e. whether they meet current standards as set out in relevant guidance); and where there might be a need for new/improved infrastructure.

We aim to produce a comprehensive inventory and map of existing walking, wheeling and cycle routes and infrastructure – highlighting where there are gaps in provision and where improvements are required – which will inform a pipeline of works to be delivered through future transport programmes (for example, via LIP funding) or as part of new development proposals (including via S106/CIL contributions).





## KEY ACTION: 7

Identify and prioritise improvements to the existing active travel network for delivery through future transport programmes and development proposals.

### Creating high-quality pedestrian and cycle infrastructure

The way pedestrian and cycle infrastructure is designed and built greatly influences who uses it, with the quality, safety and attractiveness of the active travel network among the many factors that deter some people from walking, wheeling and cycling.

As part of our plans to create a high-quality, well-connected active travel network in Brent – one that can be used by people of all ages, abilities and confidence levels – we will ensure that all pedestrian and cycle infrastructure is implemented in line with the latest standards and best practice and, as a minimum, adheres to the following design principles:

- **Coherent**

Active travel networks should be designed so that people of all ages, abilities and confidence levels can reach their day-to-day destinations easily, along routes that connect, are simple to follow and are of a consistently high quality. In particular, the provision of adequately safe, attractive and comfortable facilities along main roads is crucial to creating a coherent cycling network.

- **Direct**

Walking, wheeling and cycling routes should provide the shortest and fastest ways of travelling from place to place. This includes providing facilities at junctions that minimise delay and the need to stop. To make cycling an attractive alternative to driving short distances, cycle routes should be at least as direct – and preferably more direct – than those available for private motor vehicles.

- **Safe**

Pedestrian and cycle infrastructure should be safe and perceived to be safe so that people of all ages, abilities feel confident to walk, wheel and

cycle. Safety for all road users can be achieved by reducing motor traffic volumes and speeds, or, in the case of cyclists, by providing dedicated and protected space where a significant reduction in traffic speeds and volumes is not appropriate. Risks relating to crime and personal security can be reduced through passive surveillance and by providing lighting; whilst maintenance to address surface defects, overgrown vegetation, fallen leaves, etc. will help to reduce the likelihood of falls and crashes.

- **Comfort**

To make walking, wheeling and cycling comfortable ways of travelling, routes must have good quality, well-maintained, smooth surfaces, adequate width for the number of users, minimal stopping and starting, and must avoid steep gradients, excessive or uneven slopes and sharp bends. Avoiding interaction with high speed or high volumes of motor traffic can also increase comfort levels for those walking, wheeling and cycling. Comfort for all users including children, families, older and disabled people using three or four-wheeled cycles should also be considered.

- **Attractiveness**

The attractiveness of a route can affect whether people choose to make a journey by walking, wheeling and cycling. People often value attractive walking, wheeling and cycling routes with well-designed streets and public spaces, such as parks. Equally, people will avoid routes that cause concerns for their personal safety, such as routes with poor lighting or fast and dangerous traffic. Cycle infrastructure in particular should help to deliver public spaces that are well designed and be places that people want to spend time using.

Source: Cycle infrastructure design (LTN 1/20), DfT 2020

- **Grow the Brent active travel network**

In parallel to this, we will work together with our communities and partners to implement a significant expansion of the active travel network to serve residents and businesses across Brent and beyond.

set out in the Brent LTTS, a key target is to increase the proportion of residents who have access to a safe and pleasant cycle network – rising from 6% currently to 80% by 2041.



## KEY ACTION: 8

Identify and prioritise for delivery new walking, wheeling and cycling routes as part of proposals to expand the active travel network in Brent.

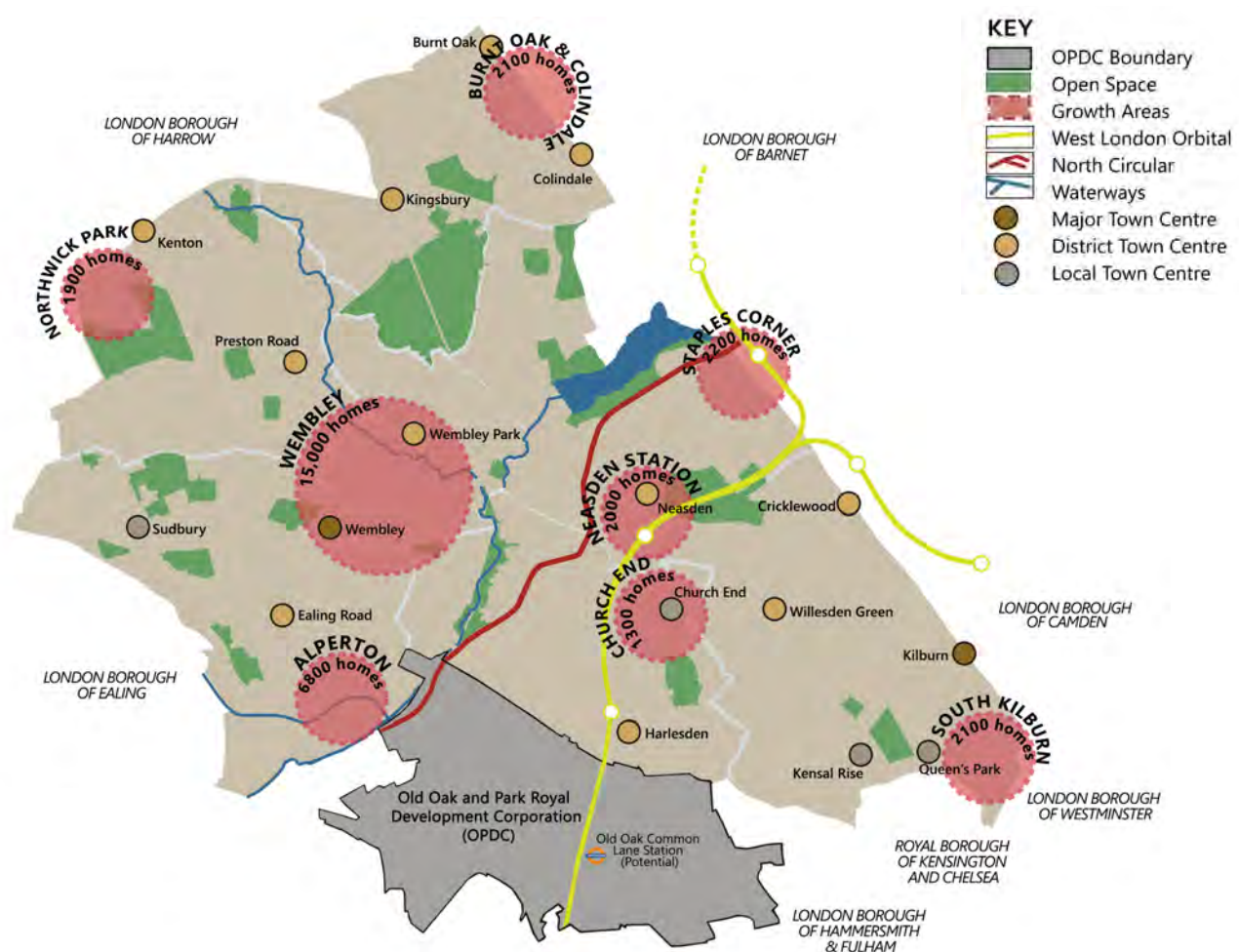
The expanded active travel network will comprise the following distinct layers:

- **Strategic walking, wheeling and cycling links**

With a focus on connecting the borough's growth areas (see Figure 3.4, below) - where significant numbers of people currently live, work and travel, and which are forecast to grow over the next 20 years

- we will identify and implement a network of high-quality strategic walking, wheeling and cycling links across Brent. Designed and delivered in line with TfL's new quality criteria for walking, wheeling and cycling and supported by enhanced wayfinding facilities, routes will also link our main employment areas, town centres and transport interchanges, as well as providing connections to neighbouring boroughs.

Figure 3.4: Brent growth areas and town centres



- **Local walking, wheeling and cycling routes**

As well as the main strategic links, a network of local walking and cycling routes linking our residential areas, district centres, suburban stations, schools and other important trip generators in the borough will also be identified and implemented. Under the banner of 'Brent Healthy Routes', we will work with our communities and partners to identify the best existing local routes to be upgraded and new routes

to be implemented - all to the same high standard as the strategic routes.

- **Leisure walking, wheeling and cycle routes and Rights of Way**

Brent has a number of leisure walking, wheeling and cycle routes which link parks, waterways and historic sites and allow people to explore nature in the borough and to experience its historical and

architectural heritage. These include the Capital Ring Walk which passes through Kenton in the north of the borough and around 16 kilometres of Public Rights of Way. The Council is committed to always keeping this network open and accessible to the public and maintained to a standard that is appropriate for the type of user.

- **Other routes**

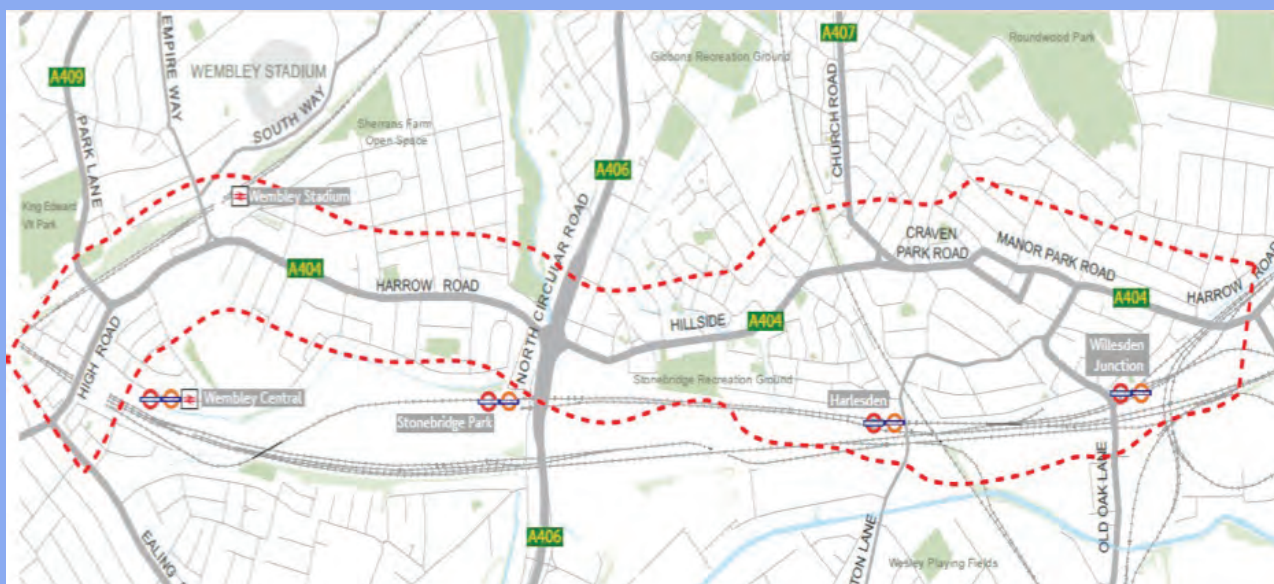
We are also committed to completing delivery of the high-quality routes currently under development by TfL, including routes forming part of the 'Cycleways' programme. In Brent this includes the Wembley to Willesden Junction Healthy Streets Corridor Improvements Scheme (see below).

## Wembley to Willesden Junction Healthy Streets Corridor Improvements Scheme

The Council is working closely with TfL and our local communities on developing proposals for a range of Healthy Streets improvements along a 5km corridor between Wembley and Willesden

Junction (see Figure 3.5, below), with the aim of significantly improving the public realm and conditions for pedestrians and cyclists in the area.

**Figure 3.5: Indicative Wembley to Willesden Junction Healthy Streets Corridor**



The corridor is one of a number across London which have been identified as having some of the highest potential for walking, wheeling and cycling but currently lack safe and user-friendly infrastructure. The delivery of this scheme will serve to further improve pedestrian and cycle

connectivity within the borough and help promote sustainable mode shift. Subject to the outcome of consultation, work to progress the first phase of improvements between Wembley Central station and Harlesden station could commence in late 2024.





- **Address severance issues**

A key priority for the Council remains the need to improve pedestrian and cycle access over physical barriers such as major roads, railways and waterways as a means of reducing severance and connecting our communities. We will seek to expand the reach

of the Brent active travel network by identifying opportunities to address major sources of severance in the borough, including the North Circular Road, mainline and Underground rail lines and the Grand Union Canal (see below).

**KEY ACTION: 9**

**Identify and prioritise for delivery new/enhanced walking, wheeling and cycling connections across key sources of severance in the borough.**

## Grand Union Canal Pedestrian and Cycle Bridge, Alperton

Alperton is a strategic Growth Area and GLA Housing Zone in the south of the borough which is undergoing significant redevelopment with plans to create 6,500 new homes, new workspace provision, community facilities and supporting infrastructure improvements – including a range of enhancements to the local transport network.

Among the key transport infrastructure improvements identified includes the delivery of a new pedestrian and cycle bridge across the Grand Union Canal as a means of improving walking, wheeling and cycling connectivity in the area and to provide better active travel links to other parts of the borough and beyond.

In 2020 the Council commissioned a study to explore potential options for the location and arrangement of a new pedestrian/cycle bridge across the Grand Union

Canal. The study investigated several options for the proposed new bridge, arriving at a preferred option which is currently undergoing further assessment around ecological impact and deliverability. Subject to the outcome of this work and following agreement by all relevant stakeholders, it is anticipated that more detailed design work will commence later in 2024.



- **Provide more secure cycle parking**

Despite the progress made to improve cycle parking provision in Brent in recent years, many people are deterred from cycling due to a lack of high quality secure cycle parking – especially for non-standard cycles. This is a particular issue in high footfall destinations such as town centres and stations, and some of our older housing estates, where the supply of secure cycle parking facilities often does not meet demand.

Resolving this is a key priority, and we are committed to delivering more secure cycle parking across the borough, focusing on expanding the range of facilities available and increasing provision where demand and potential are greatest. In particular, we will:

- Work with TfL, Network Rail and train operating companies to provide more cycle parking at

stations, including exploring opportunities to deliver secure cycle parking hubs.

- Engage with businesses, retailers and developers to examine ways to deliver additional secure cycle parking in priority locations such as our growth areas, town centres and business/retail parks. Providing secure parking facilities for cargo bikes for businesses is a particular priority.
- Deliver more on-street cycle hangars and retrofit our housing estates with secure cycle parking as part of a drive to improve residential cycle parking.
- Require that all new residential developments provide appropriate levels of high-quality, secure cycle parking, in line with the policies in the London Plan and the Brent Local Plan; and meeting the requirements of the London Cycling Design Standards (LCDS).

## KEY ACTION: 10

Expand the provision of different types of secure cycle parking facilities across the borough, prioritising areas of high demand/cycling potential.

### Tackling cycle theft

Many people are deterred from cycling due to a fear of having their cycle stolen. As well as providing more secure cycle parking spaces around the borough, we are also working closely with TfL and the Police to take wider action to deter cycle theft in Brent, including encouraging cycle marking and registration which are quick and effective ways for authorities to identify the legitimate owner of a bike and will help to eliminate the trade in stolen property.

BikeRegister is London's official cycle database, and we will look to promote this to our residents through a range of channels. We will also work with cycle shops in the borough to extend opportunities for cycle marking and registration at the point of sale and maintenance. We will also explore other measures to reduce cycle crime and deter criminal behaviour in the borough, including improving the design and location of cycle storage solutions – both on-street and in buildings – providing additional CCTV and improving street lighting.



### Quick Win

Cycle training sessions represent a good opportunity to convey to people crucial information on

combating theft, such as through cycle marking and secure locking techniques.

- **Improve signage and wayfinding**

Effective signage and wayfinding are an essential element of making it easier for people to walk, wheel and cycle. In particular, a consistent system of signing for pedestrians and cyclists makes active travel more accessible to more people – informing users of the route possibilities and destinations they can travel to and increasing the visibility of the wider active travel network.

Over the years, a mixture of different signage and wayfinding measures have been put in

place across the borough, ranging from simple, standalone direction and destination signposts, to more comprehensive Legible London signage and wayfinding boards produced and maintained by TfL.

As an important step in making the active travel network in Brent more cohesive and to help pedestrians and cyclists travel around with greater ease, we propose to develop a wayfinding strategy which will set out a clear and consistent approach to signage and mapping for active travel modes in the borough.

### KEY ACTION: 11

#### Develop a borough-wide wayfinding strategy setting out a clear and consistent approach to signage and wayfinding for pedestrians and cyclists.

- **Integrate walking, wheeling cycling and public transport**

Many people who walk, wheel and cycle in Brent do so as part of longer multi-modal journeys often involving the use of public transport. For example, a significant proportion of people travelling to and from stations in the borough are pedestrians or cyclists; whilst the bus network in Brent provides a comprehensive range of travel options for distances that are too long to walk, wheel or cycle.

To cater for the 'whole journey', bus stops, stations and

other public transport interchanges and the areas around them need to be designed to accommodate onward journeys by active modes of travel. In particular, bus stops should be clutter-free and wheelchair accessible; whilst the areas outside stations should be easy to navigate and offer seamless interchange between modes. Accordingly, the Council will work with TfL, Network Rail and train and bus operating companies to identify where improvements for pedestrians and cyclists are required around stations and bus stops in the borough.

### KEY ACTION: 12

#### Undertake Healthy Streets Audits at stations and other key transport interchanges in the borough to identify opportunities for active travel improvements.

### 3. Equip our communities with the confidence and means to walk, wheel and cycle

Infrastructure improvements alone will not be enough to significantly increase the number of people walking, wheeling and cycling in Brent and raising awareness of and changing attitudes to active travel will be just as important. We also need to equip people with the confidence and motivation to walk and wheel as well as providing them with the skills and means for taking up cycling.

To this end, a comprehensive programme of support, advice, training and community events, along with access to appropriate equipment for cycling is proposed that will raise the profile of and remove the socio-economic barriers to active travel. Details of the specific measures are set out below.

- **Ensure everyone in Brent has the chance to walk, wheel or cycle**

Brent is a culturally rich and diverse borough with many individuals and groups who are keen advocates of active and sustainable travel. However, for many people in Brent walking, wheeling and cycling are not viewed as the natural choice for daily travel, with the car often the preferred mode of transport. Women, young people, the elderly, people on low incomes and ethnic minority groups in particular are less likely to walk, wheel or cycle.

To make active travel in Brent inclusive and appealing to as wide a range of people as possible, we plan to invest in targeted community engagement, training and behaviour change initiatives with a particular focus on supporting those who experience the greatest barriers to walking, wheeling and cycling, including currently under-represented groups such as women, families and ethnic minority groups.





## Making walking, wheeling and cycling safer for women and girls

The safety of women and girls while travelling in London is an important issue. According to data from TfL, women and girls are disproportionately affected by sexual harassment while travelling in London by public transport, in taxi and private hire vehicles, walking, wheeling and cycling. This is clearly unacceptable and needs to change.

The way in which our transport networks, streets and places are planned, designed, operated and policed can have a significant impact on crime, safety and the perception of safety. In 2022, as a means of improving the safety of women and girls when walking, wheeling and cycling, TfL - in

partnership with the GLA, the Mayor's Office for Policing and Crime (MOPAC) and the Night Czar - commissioned research to understand and innovate in how design impacts safety in public spaces.

As part of this work, TfL has recently begun piloting women's safety audits in a small number of transport environments, including in Brent. The Council is closely involved in the pilot initiative and will commit to undertaking similar audits when developing future transport and public realm improvement schemes in the borough.





## KEY ACTION: 13

Establish an active travel community engagement programme with a view to increasing the number of people walking, wheeling and cycling from under-represented groups.

### Quick Win

A number of programmes exist which allow residents groups to bid for funding to promote active travel in their communities. One of the main ones in London is TfL's Walking and Cycling Grants London (WCGL) programme which has

been successful in funding a number of projects in Brent. We will work closely with our local communities to signpost them to this and other similar programmes run by other organisations.

- **Encourage more walking, wheeling and cycling to school**

The school run is a known major trip generator at peak times during the school week due to the high numbers of families who travel to school by car. These everyday journeys add congestion to the road network, often resulting in increased levels of air pollution, and can create safety issues at a time where there are higher volumes of people – in particular, children – present.

To address these issues, the Council will continue to work closely with borough schools and their families on developing and implementing bespoke travel

plans, exploring ways to increase the number of journeys made by active modes. To maximise the impact of scheme on improving the quality of life for our younger residents, we will target schools in areas with poor air quality and poor public health and with high numbers of road casualties.

We will also look to introduce a range of other behaviour change initiatives as part of an expanded School Travel programme, working closely with nursery, primary and secondary school communities to raise awareness of the benefits of walking, wheeling and cycling and to establish an active travel culture amongst the next generation of our residents.





## KEY ACTION: 14

Work with school communities across Brent to trial new and innovative behaviour change initiatives to be delivered as part of an expanded School Travel programme.



### School Travel Plans

A key aspect of the Brent School Travel programme is working with school communities on the development of School Travel Plans (STPs) with a view to encouraging sustainable alternatives to car travel on the school run.

There are currently 42 schools in Brent with active travel plans in place – 28 of which have achieved gold standard as part of the STARS (Sustainable Travel, Active, Responsible, Safe) programme – TfL's travel plan accreditation scheme for London schools and nurseries.

Since its inception in 2007, STARS has been inspiring pupils across the borough to walk, scoot and cycle to school, in turn helping to reduce congestion and pollution around our schools and improving the health and wellbeing of pupils and staff. Several our schools have also been recognised for their achievements to increase active travel on the school run, including Preston Manor School which recently won the TfL STARS Active Travel Heroes Award for West London.

#### • Promote active travel for work

Another significant trip generator in the borough is the journey to work. According to latest census figures, the current mode share to work by car in Brent is around 22% (14). This equates to approximately 132,000 trips per day by car (15). However, the data also suggests that nearly 40% of journeys to work are under 10km in length (16), meaning there is significant potential to reduce the level of car-based commuting.

Workplace Travel Plans represent a great way to encourage active travel for commuting and business

purposes. They can also bring about benefits for business and staff such as reduced business and travel costs, a healthier, more productive workforce, and improved corporate image.

We will continue to work with businesses and other organisations in the borough to provide advice on sustainable travel choices and to encourage the development of workplace travel plans. In particular, we will work in partnership with local businesses to develop area-wide travel plans for key centres of employment in Brent as a means of encouraging more people to walk, wheel and cycle to work to these locations.



## KEY ACTION: 15

### Develop area-wide travel plans for key centres of employment in Brent as a means of encouraging more people to walk, wheel and cycle to work.

- **Provide training and encouragement for children, adults and families**

To encourage more people to switch to active travel in Brent, we need to provide them with the confidence to walk and wheel and the skills to cycle. Active travel training and, in particular, cycle training, has an important role to play in achieving this.

Bikeability training in primary schools is a well-established programme and has already helped many children across Brent to become confident cyclists. Cycle training and working with schools will therefore continue to form an essential part of our approach and we will investigate opportunities to expand training to all secondary schools and other education establishments across the borough.



(14) 2021 Census – Method of travel to workplace, ONS 2022

(15) London Travel Demand Survey 2017/18 – 2019/20, TfL

(16) 2021 Census – Distance travelled to work, ONS



## KEY ACTION: 16

### Expand active travel training to all secondary schools and other education establishments in Brent.

The Council currently offers free cycle training to adults and families, enabling residents of all ages and abilities to gain the confidence and skills to ride. Our ambition is to make a wider range of active travel training programmes available to more of our communities and we will explore funding opportunities to achieve this. We particularly would like to encourage greater take-up among ethnic minority groups and women.

- **Inspire our residents and celebrate walking, wheeling and cycling**

Whilst most people recognise the benefits of active

travel, these positive attitudes are rarely enough to make people walk, wheel and cycle and we need to encourage more of our residents to actively want to do it. To help build the desire for active travel, we will establish a wide-reaching communications campaign to showcase the benefits and experiences that can be enjoyed when walking, wheeling or cycling instead of taking the car. This will be supplemented with further initiatives targeted at newly launched walking, wheeling and cycle routes and other pedestrian and cycle improvements in the borough.

## KEY ACTION: 17

### Establish a borough-wide communications campaign highlighting the benefits of and opportunities for taking up walking, wheeling and cycling.

We also propose to host an annual 'Active Travel in Brent' event showcasing the work the Council and its partners are undertaking to improve conditions for walking, wheeling and cycling in the borough and setting out our plans for the future. The event will be supported by a wide-ranging communications and

marketing campaign celebrating all things active travel related. We will also continue to promote walking, wheeling and cycling as part of national campaigns, such as National Bike Week, Walk to School Week and World Car Free Day.

## Quick Win

Activities and events can also have a big impact on encouraging more people to walk, wheel and cycle. To help more of our residents experience the benefits and opportunities of walking, wheeling

and cycling, we will continue to support local communities and businesses in Brent to host events and other activities with a focus on promoting active travel.





- **Improve access to bikes for residents...**

Some trips that would be perfect for cycling are made more difficult by lack of access to a cycle. Currently, around half of Londoners do not have access to a cycle in their home, although there are significant variations between different parts of the capital.

Cycle hire schemes represent one of the best opportunities to make cycling more accessible and attractive for people in Brent, especially for those who may not be able to afford to purchase a bike or have space to store one. A number of bike hire schemes have established themselves in London in recent years and now form an important part of the capital's transport mix. These include Santander Cycles – TfL's Cycle Hire Scheme, which operates predominantly

in central London; and several dockless cycle hire schemes which serve large parts of both inner and outer London, including Brent.

As a means of improving access to bikes for our residents and helping to unlock new cycle journeys, we will work closely with TfL to try and extend the Santander Cycles scheme to Brent, with a particular focus on serving those parts of the borough which are major trip generators – such as Wembley. We will also work closely with Lime to strengthen arrangements around how and where they operate their dockless e-bikes in the borough – with a particular focus on addressing some of the concerns around inconsiderate and unsafe cycle parking which have been raised by residents.

**KEY ACTION: 18**

**Work with TfL to secure the extension of the Santander Cycles scheme to Brent.**



## Lime Electric Cycle Hire Scheme

An electric cycle hire scheme, managed by the American transport and shared mobility company Lime, began operating in Brent in November 2019 with the aim of providing our residents and visitors to the borough with a healthy, sustainable and convenient alternative to travelling by car.

Currently operating with around 500 bikes deployed across the borough, the scheme works under a 'free-floating' or 'dockless' model, meaning there are

no dedicated cycle stands, and bikes can be hired and returned anywhere on the public highway. In the three years that it has been operating in Brent the scheme has become an established part of the borough transport network and has proved popular with users who cite it as being a convenient mode of travel for short journeys. Data from Lime has revealed a year-on-year increase in ridership with over 500,000 trips made within the borough to date.

- **...and businesses**

Over the last few years there has been a surge in the availability and popularity of cargo bikes which are increasingly seen by businesses as a versatile, low-cost, and environmentally friendly way to transport goods. In particular, when used as a regular last-mile delivery solution, they can deliver considerable carbon emission and air pollution savings, contribute to healthier and safer streets and enable better use of our urban space.

Building on the success of Brent's Bikes for Business programme (see below), and as a means of achieving our wider ambitions for transport, the environment and economic growth, we will look to facilitate the growth of cargo bikes for businesses, community organisations and families to move goods, materials and shopping around the borough. Further details of how this will be achieved will be set out in our Delivery and Servicing Action Plan to be developed in 2024.



## Brent's Bikes for Business Programme

In Spring 2023 the Council launched the Brent's Bikes for Business Programme as a means of providing support for businesses and organisations across the borough to use cargo bikes for deliveries of goods and services. The programme builds on the success of two earlier cargo bike trial schemes in Harlesden and Willesden Green.

Through the programme, businesses can access free advice and one-off subsidies of up to £1,000 to help them make the switch to cargo bikes. The subsidies can be used towards the cost of leasing or purchasing a cargo bike or as a contribution towards hiring a third-party cargo bike delivery service. In addition, the Council offers free rider training and marketing and promotion to all businesses who take part.



## Geographical priorities for delivery

Active travel measures and interventions will be implemented throughout the borough. However, in recognition that the nature and scale of transport challenges – and barriers to active travel – vary significantly across Brent, there will be a particular focus on the following key areas:

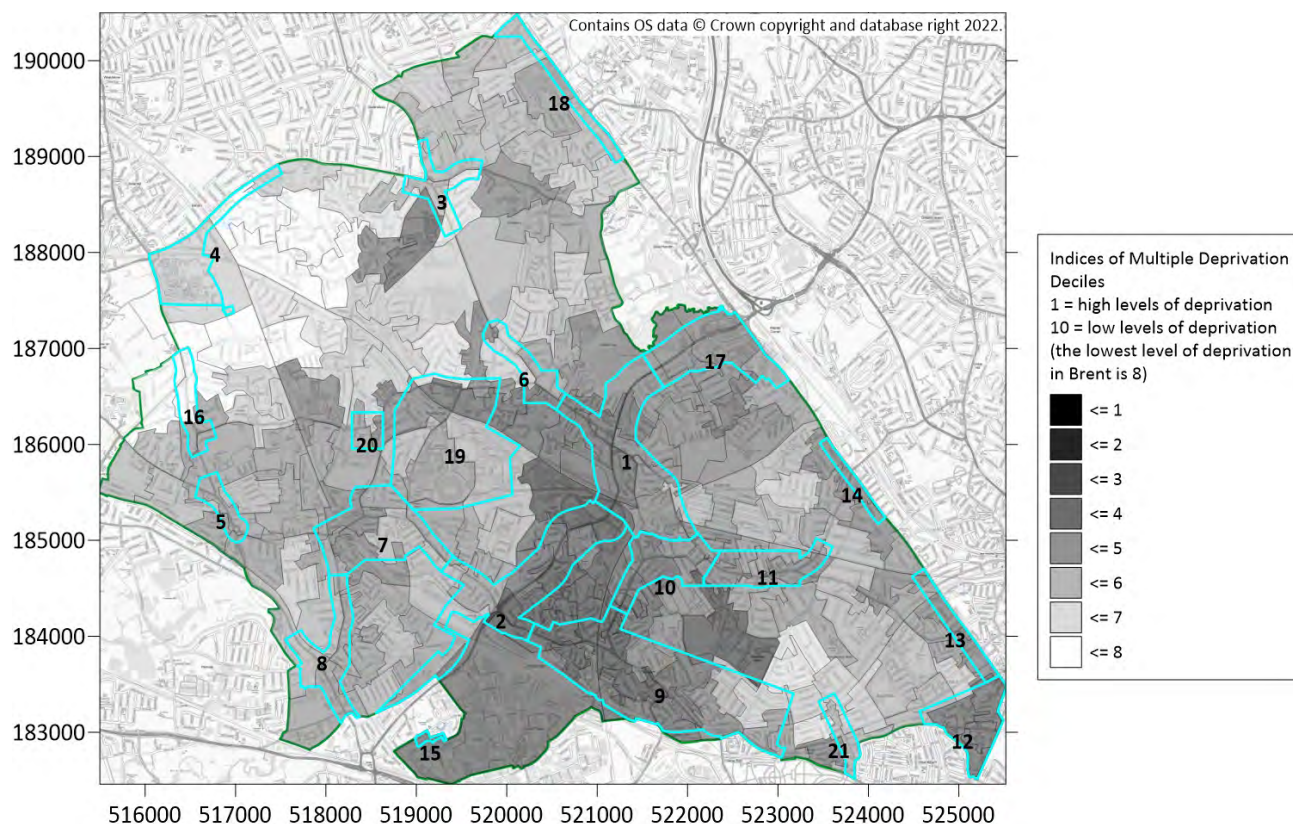
- **Growth areas/major employment centres** – Central to our ambition for walking, wheeling and cycling in Brent is the creation of a well-connected and accessible active travel network linking key parts of the borough. A key focus will be on enhancing walking, wheeling and cycling links to and between our major growth and employment areas from outside and within the borough.
- **Other key trip generators** – Improving access by walking, wheeling and cycling to other key trip generators in the borough such as local health, shopping and leisure facilities is also an important consideration and will be central to our plans. In particular, we will look to improve walking, wheeling and cycling access to the two main hospital sites in the borough – Northwick Park and Central Middlesex, as well as providing better facilities to support active travel to and within our district and local centres and borough parks and open spaces (see below). We are also keen to facilitate greater levels of walking, wheeling and cycling to Wembley Stadium – a significant trip generator on event days.
- **Schools and other education facilities** – A key focus of our activities, the Council hopes to encourage more pupils and students to walk, wheel and cycle as part of their daily routine as a means of reducing congestion and pollution around schools

and colleges and to improve people’s health and quality of life. Our School Travel programme will be available to all schools and colleges in the borough but will look to focus on those establishments in areas with poor air quality and poor public health and with high numbers of road casualties.

- **Public transport interchanges** – A significant amount of pedestrian activity occurs around stations and bus stops, so we need to ensure walking and wheeling is well integrated with the public transport system. To cater for longer multi-modal journeys, adequate provision also needs to be made for cyclists – especially at larger stations in the borough.
- **Local neighbourhoods** – Most streets in the borough are residential. Improving the look and feel of these streets and connecting them to local destinations will be important in boosting walking, wheeling and cycling growth, particularly in those parts of the borough less well served by public transport. A priority for the delivery of comprehensive walking, wheeling and cycling improvements will be those areas forming part of our Green Neighbourhoods initiative.
- **Air Quality Focus Areas** – In line with the aims and objectives of the Brent Air Quality Action Plan, a key focus for improving conditions for active travel will be those parts of the borough designated as an Air Quality Focus Area (AQFA) (see Figure 3.6, below). As well as helping to improve air quality, measures aimed at reducing the dominance of motorised traffic and giving greater priority to pedestrians and cyclists in these areas will help us address wider health inequalities in the borough.



**Figure 3.6: Brent Air Quality Focus Areas**



Source: Brent Air Quality Action Plan 2023 - 2027

## Connecting our parks and open spaces

Brent is the 4th most deprived borough in London and 55% of adults within the borough are overweight or obese. Opportunities to access high quality open space can have a major influence on people’s quality of life, whilst having access to areas of greenspace is widely regarded as being good for mental health and wellbeing. Enabling active environments, like making our parks and open spaces more accessible, is one way in which we can motivate and support people to move more. However, there are parts of the borough with low levels of accessible public open space.

As a means of helping tackle this deficiency and to increase levels of active travel, we need to create better walking, wheeling and cycling connections to and from our existing parks and open spaces and other areas of green and blue infrastructure. Improving walking, wheeling and cycling links to Welsh Harp, for example, would allow the borough to reclaim an attractive natural feature and provide health and wellbeing benefits. In addition, the proposed new pedestrian and cycle bridge across the Grand Union Canal in Alperton

will significantly improve access to this important blue infrastructure corridor, whilst improving connectivity to the wider area (see page 40).





## Funding the delivery programme and prioritising spending

The availability of funding will be pivotal in the delivery of the plan, with funding for active travel projects expected to come from a range of sources, including from Central Government, the Mayor and Transport for London and the Council. However, ongoing pressures to sources of public finance caused by the recent Covid pandemic mean that we will also need to explore other sources of funding, such as from developers and other third parties, if we are to realise our ambitions for walking, wheeling and cycling in Brent.

A summary of the principal funding sources for

implementing the Delivery Plan is set out in Figure 3.7, below. Funding for implementing the majority of schemes and initiatives is expected to come from TfL via the Local Implementation Plan (LIP), whilst TfL's Liveable Neighbourhoods and the GLA's Future Neighbourhoods 2030 programme also provide the Council with the opportunity to access funding for more comprehensive projects. We also anticipate the need to secure funding contributions from developers for some of our pedestrian and cycle infrastructure schemes – either through Section 106 or Community Infrastructure Levy (CIL) – whilst Public Health Grant funding could offer opportunities to implement active travel initiatives that are focused on improving the health and wellbeing of our residents.





**Figure 3.7: Delivery plan – principal funding sources**

Funding Provider	Funding Programmes
Transport for London (TfL)	<ul style="list-style-type: none"> <li>• <b>Safer Corridors and Neighbourhoods.</b> Core funding for the delivery of schemes aimed at improving road safety, reducing the dominance of vehicular traffic and creating safer, greener and more inclusive places for pedestrians and cyclists. The Council was awarded c.£1million in 2023/24 and anticipates a similar amount in 2024/25.</li> <li>• <b>Cycleways.</b> Funding programme for the implementation of high-quality, strategic cycle routes across London. A new cycleway is currently being developed as part of TfL's Healthy Streets improvement scheme between Wembley and Willesden Junction.</li> <li>• <b>Cycle Parking/Cycle Training.</b> Ringfenced funding for the delivery of secure, residential cycle parking facilities and adult and child cycle training. The Council was allocated c.£200,000 for this in 2023/24.</li> <li>• <b>Liveable Neighbourhoods.</b> Funding for the delivery of community-supported schemes to reduce car trips and improve neighbourhoods for walking, wheeling, cycling and public transport. The programme is currently paused due to TfL funding pressures, but the Council plans to submit funding bids in future years if it is restarted.</li> <li>• <b>Walking and Cycling Grants London.</b> Similarly on pause. The programme previously awarded c.£500,000 to community projects across London, funding several projects in Brent. The Council will work with community groups in the borough to develop and submit funding bids in future years if the programme is restarted.</li> </ul>
Greater London Authority (GLA)	<ul style="list-style-type: none"> <li>• <b>The Mayor's Air Quality Fund (MAQF).</b> Funding for the introduction of measures to address poor air quality in London.</li> <li>• <b>The Future Neighbourhoods 2030 Programme.</b> Funding to support deprived, climate vulnerable neighbourhoods to transition to a low carbon future.</li> </ul>
Central Government Funding	<ul style="list-style-type: none"> <li>• <b>Active Travel Fund (DfT).</b> Grant funding for Councils for the introduction of pedestrian and cycle facilities. Brent was awarded c.£600,000 in 2020/21 for measures to aid walking, wheeling and cycling during the Covid pandemic.</li> <li>• <b>Air Quality Grants (DEFRA).</b> Awarded across England to fund local projects for cleaner air.</li> <li>• <b>Levelling Up Fund (DLUHC).</b> A £4.8 billion fund to support town centre and high street regeneration and local transport projects across the UK.</li> <li>• <b>Public Health Grant (DHSC).</b> Funding for local authorities to improve health in local populations. Scope to use funding to implement active travel initiatives.</li> </ul>
Brent Council	<ul style="list-style-type: none"> <li>• <b>Highways Maintenance Programme.</b> Annual programme of footway reconstruction, carriageway resurfacing and other repair and improvement works across the borough. Currently around £3.5 million is allocated each year towards this. In addition, the Council is part-way through a four-year £15m footways investment programme.</li> </ul>
Developers	<ul style="list-style-type: none"> <li>• <b>Community Infrastructure Levy (CIL).</b> Levied on certain types of new development, CIL is currently used to fund a wide range of transport infrastructure improvements in the borough, with c.£4 million being made available to fund active travel infrastructure improvements over the next 5 years.</li> <li>• <b>Section 106 Contributions.</b> C.£600,000 of retained S106 funding was allocated in 2022 for a range of transport, highways and public realm improvements linked to new developments in the borough.</li> </ul>
Other potential funding sources	<ul style="list-style-type: none"> <li>• <b>Station Improvements Programme (Network Rail/Train Operating Companies).</b> Funding for the delivery of secure cycle parking facilities and Healthy Streets improvements at stations.</li> </ul>



To help determine where any future investment in active travel should be focused, the Council has recently developed a scheme prioritisation tool. This will help ensure that the limited funding that is available for walking, wheeling and cycling measures is directed to where it is needed most and will have the greatest impact.

### **Implementing the delivery programme – involving Brent’s communities and other partners**

Responsibility for implementing the active travel delivery programme will be shared between the Council’s Transportation Planning, Healthy Streets and Parking and Highways Management teams, with close involvement from colleagues working in our Public Health, Climate Emergency and Communications Teams. We also recognise the need for and benefits of close working with a wide range of external partners and stakeholders, including TfL, developers and neighbouring boroughs, to maximise opportunities

for funding and to ensure the successful delivery of joined-up schemes.

The Council is also committed to working closely with the many diverse communities within Brent to deliver active travel improvements. Only by working closely with our residents, businesses and other local stakeholders – the experts in their areas – can we hope to address their concerns and meet their aspirations.

To ensure that active travel schemes and initiatives bring about tangible benefits to those areas in which they are introduced and don’t disadvantage others, we will employ a collaborative approach to the various stages of scheme design, implementation and monitoring. With a wide range of projects and interventions proposed – many targeted at different communities across different parts of the borough – a tailored, inclusive approach to engagement will also be required.

## 4. Assessing Progress












This final section details the targets and indicators to be used to measure progress in delivering the Active Travel Implementation Plan and the arrangements for reporting progress and reviewing it.

### Performance indicators and targets

The Brent Long Term Transport Strategy (LTTTS) identifies the range of targets and indicators to

be used to measure progress in achieving our overarching transport aims and objectives. The targets and indicators most relevant to active travel are listed in Figure 4.1, below, and will form the basis of monitoring progress of the Active Travel Implementation Plan.

**Figure 4.1: Key LTTTS Performance Indicators and Targets**

Performance Indicator/Target*	Metric	Baseline	Target
 Reduce overall traffic levels by 25%	Vehicle kilometres in Brent in given year.	1,098 million	824 million
 Reduce car ownership by 25%	Total cars owned and car ownership per household, borough residents.	97,348	73,011
 Increase walking, cycling and public transport mode share	By borough resident - based on average daily trips	69%	80%
 Achieve net zero CO2 emissions by 2030	CO2 emissions (tonnes) from road transport within Brent.	196,300	0 (2030)
 Reduce NOx emissions by 95%	NOx emissions (tonnes) from road transport within Brent.	480	24
 Reduce particulate emissions by 50%	PM10 and PM2.5 emissions (tonnes) from road transport within Brent.	PM10: 67 PM2.5: 34	PM10: 34 PM2.5: 17
 Increase the proportion of residents participating in active travel	Proportion of borough residents doing at least 20 minutes of active travel a day	31%	70%
 Eliminate all deaths and serious injuries from road collisions	Deaths and serious injuries (KSIs) from road collisions in Brent	119	0
 Reduce the total number of pedestrian, cyclist and PTW casualties by 80%	All vulnerable road user casualties from road collisions in Brent	523	105
 98% of non-emergency repairs to be made within 28 days	% of Category 2 defects repaired on time (Non-emergency repairs)	98%	98%
 Increase the proportion of residents who have access to a safe and pleasant cycle network	Proportion of borough residents living within 400m of the London-wide strategic cycle network	6%	80%

\* Target date 2041, unless stated



We will consider the inclusion of additional indicators and targets over the lifetime of the plan where these would enable us to more effectively monitor progress in delivering our objectives.

### **Monitoring and review**

An annual monitoring report, describing progress

made in delivering against the priorities and targets contained within the Active Travel Implementation plan, will be produced and reported each year. A wider review of the plan, including plan priorities and the delivery programme will be carried out every five years.





## Appendix A: Summary table of key actions

Key Actions	Timescales	Principal Funding Sources	Delivery Partners (Lead Partner in Bold)
<b>1. Make our streets safer and more inclusive for walking, wheeling and cycling</b>			
1. Review and prioritise the implementation of schemes identified in the 2020 Active Travel Consultation.	<ul style="list-style-type: none"> <li>Review to be completed by end 24/25.</li> <li>Agreed schemes to be implemented from 25/26 onwards.</li> </ul>	<ul style="list-style-type: none"> <li>TfL – Safer Corridors &amp; Neighbourhoods</li> <li>Developer – S106/CIL</li> </ul>	<ul style="list-style-type: none"> <li><b>Healthy Streets &amp; Parking</b></li> </ul>
2. Facilitate the roll-out of new and expanded School Streets schemes, prioritising ‘high risk’ locations in terms of road safety and exposure to poor air quality.	<ul style="list-style-type: none"> <li>Ongoing programme. Aim to implement at least two new School Street schemes each year.</li> </ul>	<ul style="list-style-type: none"> <li>TfL – Safer Corridors &amp; Neighbourhoods</li> <li>GLA – MAQF</li> <li>DHSC – Public Health Grant</li> </ul>	<ul style="list-style-type: none"> <li><b>Healthy Streets &amp; Parking</b></li> <li>School Communities</li> </ul>
3. Produce a business case for the introduction of more 20mph speed limits for possible implementation during the lifetime of this plan.	<ul style="list-style-type: none"> <li>Produce business case by end 24/25.</li> <li>Possible scheme roll out from 25/26 onwards.</li> </ul>	<ul style="list-style-type: none"> <li>TfL – Safer Corridors &amp; Neighbourhoods</li> </ul>	<ul style="list-style-type: none"> <li><b>Transportation Planning</b></li> <li>Healthy Streets &amp; Parking</li> <li>TfL</li> </ul>
4. Develop a pipeline of road crossing and junction improvement schemes for delivery under our Safer Streets and Places programme.	<ul style="list-style-type: none"> <li>Ongoing programme. New schemes identified annually.</li> </ul>	<ul style="list-style-type: none"> <li>TfL – Safer Corridors &amp; Neighbourhoods</li> <li>Developer – S106/CIL</li> </ul>	<ul style="list-style-type: none"> <li><b>Healthy Streets &amp; Parking</b></li> <li>Transportation Planning</li> <li>TfL</li> </ul>
5. Introduce more formal parking arrangements for dockless bikes operating in the borough, prioritising key trip generators and those areas with high levels of pedestrian activity.	<ul style="list-style-type: none"> <li>New parking arrangements to be introduced from 24/25 onwards.</li> </ul>	<ul style="list-style-type: none"> <li>TfL – Safer Corridors &amp; Neighbourhoods</li> <li>3rd Party – Lime</li> </ul>	<ul style="list-style-type: none"> <li><b>Transportation Planning</b></li> <li>Healthy Streets &amp; Parking</li> <li>TfL/London Councils</li> <li>Lime</li> </ul>
6. Identify and prioritise for delivery a programme of traffic signal improvements to enhance journey times for pedestrians and cyclists, with a focus on key trip generators across the borough.	<ul style="list-style-type: none"> <li>Ongoing programme. New schemes identified annually.</li> </ul>	<ul style="list-style-type: none"> <li>TfL – Safer Corridors &amp; Neighbourhoods</li> <li>Developer – S106/CIL</li> </ul>	<ul style="list-style-type: none"> <li><b>Healthy Streets &amp; Parking</b></li> <li>Highways Management</li> <li>Transportation Planning</li> <li>TfL</li> </ul>

Key Actions	Timescales	Principal Funding Sources	Delivery Partners (Lead Partner in Bold)
<b>2. Improve the quality and visibility of our pedestrian and cycle infrastructure</b>			
7. Identify and prioritise improvements to the existing active travel network for delivery through future transport programmes and development proposals.	<ul style="list-style-type: none"> <li>• Network review underway - to be completed by end 24/25.</li> <li>• Improvements to be implemented from 25/26 onwards.</li> </ul>	<ul style="list-style-type: none"> <li>• TfL – Safer Corridors &amp; Neighbourhoods</li> <li>• Developer – S106/CIL</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Transportation Planning</b></li> <li>• Healthy Streets &amp; Parking</li> <li>• TfL</li> <li>• Developers</li> </ul>
8. Identify and prioritise for delivery new walking, wheeling and cycling routes as part of proposals to expand the active travel network in Brent.	<ul style="list-style-type: none"> <li>• New route identification work to commence by end 24/25.</li> <li>• Future routes to be implemented from 25/26 onwards.</li> </ul>	<ul style="list-style-type: none"> <li>• TfL – Safer Corridors &amp; Neighbourhoods; Cycleways</li> <li>• Developer – S106/CIL</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Transportation Planning</b></li> <li>• School Communities</li> </ul>
9. Identify and prioritise for delivery new/enhanced walking, wheeling and cycling connections across key sources of severance in the borough.	<ul style="list-style-type: none"> <li>• Connections review to commence by end 24/25.</li> <li>• Schemes to be implemented from 25/26 onwards.</li> </ul>	<ul style="list-style-type: none"> <li>• TfL – Safer Corridors &amp; Neighbourhoods; Cycleways</li> <li>• Developer – S106/CIL</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Transportation Planning</b></li> <li>• Healthy Streets &amp; Parking</li> <li>• TfL</li> </ul>
10. Expand the provision of different types of secure cycle parking facilities across the borough, prioritising areas of high demand/cycling potential.	<ul style="list-style-type: none"> <li>• Ongoing programme for on-street cycle parking.</li> </ul>	<ul style="list-style-type: none"> <li>• TfL – Safer Corridors &amp; Neighbourhoods; Cycle Parking</li> <li>• Developer – S106/CIL</li> <li>• 3rd Party – Network Rail/Train Operators</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Healthy Streets &amp; Parking</b></li> <li>• Transportation Planning</li> <li>• TfL</li> </ul>
11. Develop a borough-wide wayfinding strategy setting out a clear and consistent approach to signage and wayfinding for pedestrians and cyclists.	<ul style="list-style-type: none"> <li>• Strategy to be completed by end 25/26. New signage to be rolled-out as part of future scheme delivery.</li> </ul>	<ul style="list-style-type: none"> <li>• TfL – Safer Corridors &amp; Neighbourhoods</li> <li>• Developer – S106/CIL</li> <li>• 3rd Party – Network Rail/Train Operators</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Transportation Planning</b></li> <li>• Healthy Streets &amp; Parking</li> <li>• TfL</li> </ul>
12. Undertake Healthy Streets Audits at stations and other key transport interchanges in the borough to identify opportunities for active travel improvements.	<ul style="list-style-type: none"> <li>• Audits to commence from 24/25.</li> <li>• Measures to be implemented from 25/26 onwards.</li> </ul>	<ul style="list-style-type: none"> <li>• TfL – Safer Corridors &amp; Neighbourhoods</li> <li>• Developer – S106/CIL</li> <li>• 3rd Party – Network Rail/Train Operators</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Healthy Streets &amp; Parking</b></li> <li>• Transportation Planning</li> <li>• TfL/Network Rail</li> </ul>

Key Actions	Timescales	Principal Funding Sources	Delivery Partners (Lead Partner in Bold)
<b>3. Equip our communities with the confidence and means to walk, wheel and cycle</b>			
13. Establish an active travel community engagement programme with a view to increasing the number of people walking, wheeling and cycling from under-represented groups.	<ul style="list-style-type: none"> <li>• Programme to be launched from 24/25.</li> </ul>	<ul style="list-style-type: none"> <li>• TfL – Safer Corridors &amp; Neighbourhoods; Cycle Training</li> <li>• DHSC – Public Health Grant</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Healthy Streets &amp; Parking</b></li> <li>• Communications</li> </ul>
14. Work with school communities across Brent to trial new and innovative behaviour change initiatives to be delivered as part of an expanded School Travel programme.	<ul style="list-style-type: none"> <li>• Ongoing programme.</li> </ul>	<ul style="list-style-type: none"> <li>• TfL – Safer Corridors &amp; Neighbourhoods; Cycle Training</li> <li>• DHSC – Public Health Grant</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Healthy Streets &amp; Parking</b></li> <li>• Communications School Communities</li> </ul>
15. Develop area-wide travel plans for key centres of employment in Brent as a means of encouraging more people to walk, wheel and cycle to work.	<ul style="list-style-type: none"> <li>• Business engagement ongoing. First of new travel plans to be launched from 25/26.</li> </ul>	<ul style="list-style-type: none"> <li>• TfL – Safer Corridors &amp; Neighbourhoods</li> <li>• Developer – S106/CIL</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Transportation Planning</b></li> <li>• Healthy Streets &amp; Parking</li> <li>• Communications Business Community</li> </ul>
16. Expand active travel training to all secondary schools and other education establishments in Brent.	<ul style="list-style-type: none"> <li>• Expanded programme to be launched from 24/25.</li> </ul>	<ul style="list-style-type: none"> <li>• TfL – Safer Corridors &amp; Neighbourhoods; Cycle Training</li> <li>• DHSC – Public Health Grant</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Healthy Streets &amp; Parking</b></li> <li>• Communications School Communities</li> </ul>
17. Establish a borough-wide communications campaign highlighting the benefits of and opportunities for taking up walking, wheeling and cycling.	<ul style="list-style-type: none"> <li>• Campaign to be launched from 24/25.</li> </ul>	<ul style="list-style-type: none"> <li>• TfL – Safer Corridors &amp; Neighbourhoods</li> <li>• DHSC – Public Health Grant</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Healthy Streets &amp; Parking</b></li> <li>• Communications</li> </ul>
18. Work with TfL to secure the extension of the Santander Cycles scheme to Brent.	<ul style="list-style-type: none"> <li>• Produce business case by end 25/26.</li> <li>• Subject to agreement/funding, begin incremental roll-out from 26/27.</li> </ul>	<ul style="list-style-type: none"> <li>• TfL – Cycle Parking</li> <li>• Developer – S106/CIL</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Transportation Planning</b></li> <li>• Healthy Streets &amp; Parking</li> <li>• TfL</li> <li>• Developers</li> </ul>







# Brent Active Travel Implementation Plan Community Consultation Report

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**Prepared for Brent Council**

FEBRUARY 2024

# Contents

<b>Background and aims</b>	<b>3</b>
<b>About Kaizen</b>	<b>4</b>
<b>What was done</b>	<b>5</b>
Approach	5
Methodologies	5
<b>About the data</b>	<b>6</b>
<b>Headline Stats</b>	<b>7</b>
<b>Who was engaged</b>	<b>9</b>
<b>What people said</b>	<b>12</b>
Views on walking and cycling in Brent	12
Addressing the barriers to walking and cycling in Brent	16
Views on the draft vision and priorities for active travel	19
Views on proposed measures and interventions	26
Which types of areas to focus on	30
Any other comments	33
Views from Stakeholder Groups	36
<b>Conclusions and reflections</b>	<b>39</b>
<b>Appendix 1 – Consultation materials</b>	<b>40</b>
<b>Appendix 2 – Consultation survey</b>	<b>42</b>
<b>Appendix 3 – Stakeholder responses</b>	<b>44</b>
Transport for London (TfL)	44
Brent Cycling Campaign	47
Sudbury Court Residents Association	49

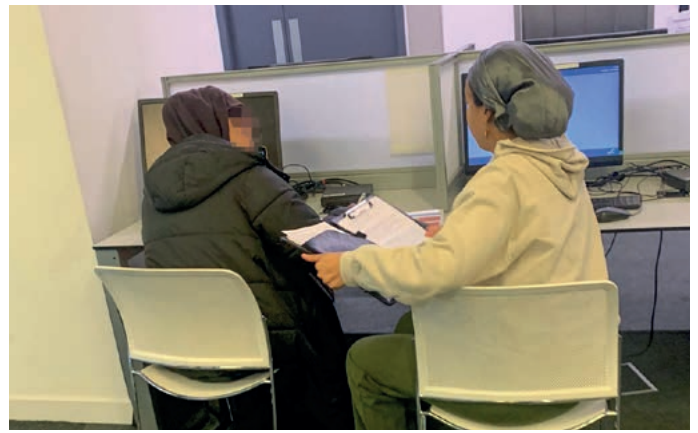


# Background and aims

Kaizen was commissioned by Brent Council to support with community engagement and outreach around the consultation on the draft Active Travel Implementation Plan (ATIP) 2024-2029.

Brent Council had developed a Draft Active Travel Implementation Plan 2024-2029, which outlines the measures and interventions that the Council and its partners are proposing to deliver over the next five years with the aim of improving conditions for, and to get more people walking and cycling in the borough.

Kaizen was commissioned by LB Brent to support them to consult with residents on the draft plan. This report covers views gathered during the community consultation on the draft ATIP that took place in December 2023 and January 2024.





# About Kaizen

The community outreach was carried out by engagement specialists Kaizen.

Kaizen, founded in 2000, is an award-winning social business that specialises in designing, delivering and facilitating cutting edge projects. Kaizen deliver work across the community sector including the areas of regeneration, education, employment, housing and the social care field. Kaizen have wide-ranging community engagement, research and consultation expertise. In particular we have a demonstrated ability to engage harder to reach and disadvantaged groups in the community who are typically not reached.





# What was done

## Approach

There were 3 strands to the consultation:

- Online survey primarily promoted by Brent Council
- Outreach based engagement by Kaizen
- Engagement with stakeholders, led by LB Brent

The survey was drafted by LB Brent with input from Kaizen. A small pack of materials was developed for the outreach, which gave an overview of the vision, priorities and proposed actions. The full draft ATIP was available for people to see on the LB Brent website. (The engagement team had business cards which signposted people to the Have Your Say page, where people could access the full draft ATIP and/or share their views online.)

## Methodologies

In order to provide opportunities for a range of community members we employed a variety of different methodologies:

- Outreach based conversations in the community
  - Outreach happened in 7 locations across Brent
  - There were 14 days of outreach
  - Most conversations were for approximately 20-25 mins; there were also some that were 40 minutes or longer with residents who were particularly keen to say more or who had additional needs that meant it took longer
- Online consultation
  - The online consultation was hosted by Brent Council and was promoted both by Brent Council and by the Kaizen team who had business cards with the URL for the online survey
  - The online survey was hosted by Brent Council and was open for approximately six weeks between December 2023 and January 2024
- Stakeholder engagement
  - LB Brent engaged with key stakeholder organisations such as TfL who were asked to respond to the draft plan

# About the data

We analysed both qualitative and quantitative data. For charts, and in text, figures have been rounded to the nearest whole number so on occasion the total will be other than 100%. Statistics relate to the total percentage of people who answered a particular question, rather than to the total number engaged, as not all questions were answered by everyone. “Prefer not to say” responses are excluded from the totals unless indicated otherwise.

Some covariate analysis is provided on the questions of the proposed measures and interventions. Due to the group size of these subgroups (which is less than 100 individuals), these views can only be indicative rather than a robust predictor of what any particular subgroup thinks and thus should be viewed with this caveat.

For the open questions we performed thematic analysis, hand coding for themes that emerged using the principles and approach of Grounded Theory. The term ‘Grounded Theory’ refers to theory that is developed inductively from a body of data, rather than from the preconceptions of the researchers.

The people who were engaged were broadly reflective of the Borough demographics, based on the 2021 census from the Office for National Statistics (ONS). As such we believe the views and experience shared can be taken to broadly represent the residents of Brent as a whole.



# Headline Stats

## Engagement Overview

- Online survey promoted by council and open for six weeks
- 14 days of outreach based engagement
- Engagement across seven locations of Brent, including Town Centres within the North and South of the Borough

## Who shared their views

- 657 people gave their views
  - 194 people shared views in one-on-one conversations in the community
  - 459 people gave their views by completing the online survey
  - 4 people shared views via email
- 73% said they walk or cycle in the borough at least 4 times a week
- 90% of people engaged via outreach said that their views had never been consulted before (76%) or not much before (15%)
- 5 stakeholder responses were received

## Views on walking and cycling in Brent

- 40% said they felt Brent was *friendly* or *somewhat friendly* for walking and cycling
- 46% said they felt Brent was *somewhat unfriendly* or *very unfriendly* for walking and cycling

## Addressing the barriers to walking and cycling in Brent

- A majority of people felt that each of the main known barriers ought to be prioritised for action as either a high, medium or low priority for the council, though barriers were not rated equally in their importance
- Addressing ‘poor quality infrastructure for pedestrians’ was the top-rated barrier for action by Brent Council – 76% said it should be a high (59%) or medium priority

## Views on the vision and priorities for active travel

- 73% strongly agreed (55%) or agreed (18%) with the overarching plan vision
- Strong majorities from all sub-groups agreed with the vision
- 76% *agreed* or *strongly agreed* with Priority 1
- 73% *agreed* or *strongly agreed* with Priority 2
- 71% *agreed* or *strongly agreed* with Priority 3

## Views on proposed measures and interventions

- For Priority 1 - all of the proposed actions were viewed as being a priority by a majority of people
  - The proposal to ‘develop a pipeline of road crossing and junction improvement schemes’ was the most commonly ranked high priority, said by 46%
- For Priority 2 - all of the proposed actions were viewed as being a priority by a majority of people
  - 52% ranked ‘identify and prioritise for delivery new walking and cycling routes’ as a high priority
- For Priority 3 - all of the proposed actions were viewed as being a priority by a majority of people
  - ‘Work with school communities across Brent to trial new and innovative behaviour change initiatives’ was the Priority 3 action most commonly ranked as high priority (49%)



## Priority areas for improvements

- 67% agreed that Brent Council should focus on delivering the Active Travel Improvement Plan in six identified key areas: major town centres, other busy locations in the borough, schools and other educational facilities, stations and other public transport interchanges, local neighbourhoods (including ‘Brent’s Green Neighbourhoods’), and Air Quality Focus Areas.
- Less than a quarter of people disagreed with the focus on delivering the Active Travel Improvement Plan in the above six identified key areas.

## Stakeholder groups

- Five stakeholders gave a response, three of which were external: Transport for London, Sudbury Court Residents Association, and Brent Cycling Campaign (BCC), and two internal: Principal Tree Officer and Principal Transport Planner, Brent Council.
- All five stakeholders were broadly supportive of the Draft Active Travel Implementation Plan. Each stakeholder also provided specific suggestions on various aspects of the plan.





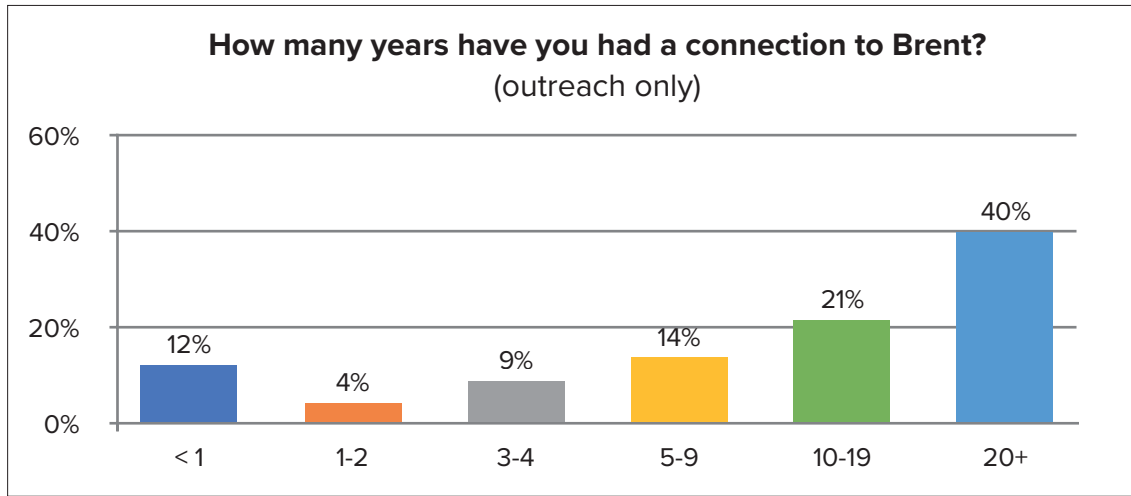
# Who was engaged

A total of 657 people shared their views.

- 459 people gave their views online
- 4 people shared views via email
- 194 people were engaged in the outreach

## Length of Connection to Brent

Most people who shared their views via outreach had a long connection to Brent, though 16% had a connection of less than 3 years. (This question was not asked online.)

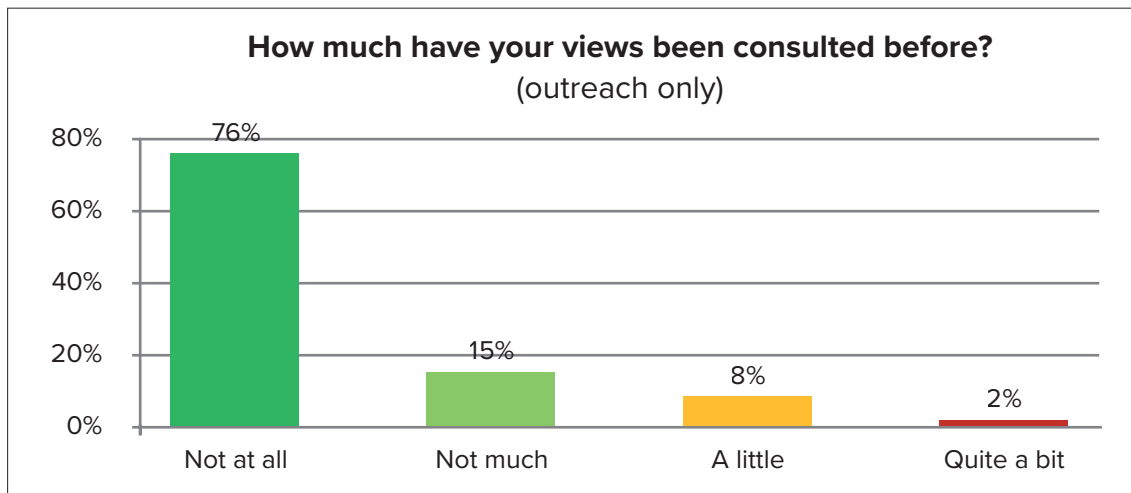


Base = 191

## How much views have been consulted before

The outreach was effective in engaging people who had not previously given their views, compared to the people who responded online. This question was not asked in the online consultation.

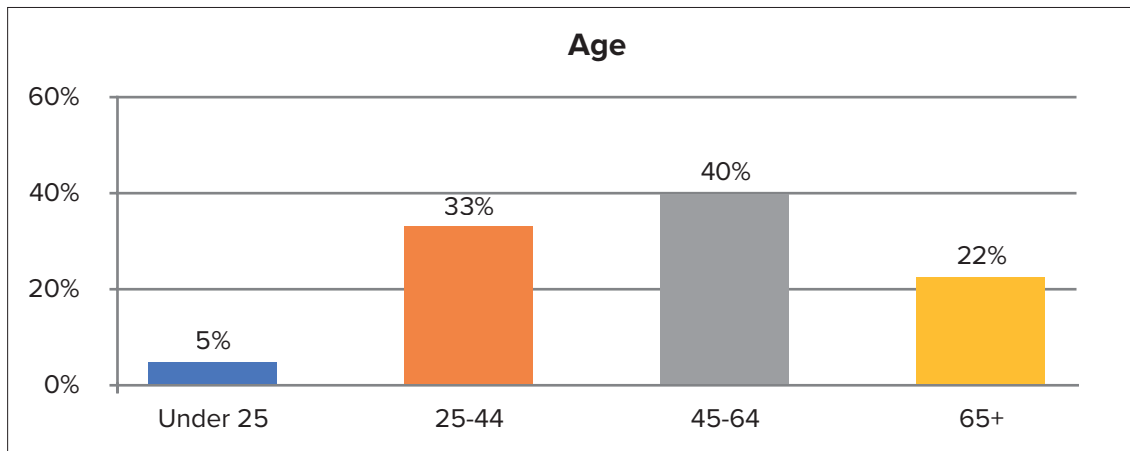
90% of those engaged via outreach said that their views had never been consulted before (76%) or not much before (15%).



Base = 188

## Age

People from a range of ages were engaged and shared their views.



Base = 583

This diversity of ages of those engaged broadly matched the Census data for Brent (using the Office of National Statistics Census Data for 2021 in Brent as a baseline).

There was some clear difference in the age profile between people who were engaged in the outreach and those who completed the survey online, with the outreach sample being more representative of Brent population than the online sample.

Age group	2021 Census*	Outreach	Online	All responses (Online + Outreach)
<25	19%	11%	2%	5%
25-44	39%	41%	29%	33%
45-64	29%	35%	42%	40%
65+	14%	13%	27%	22%
<b>Base</b>	<b>n/a</b>	<b>190</b>	<b>393</b>	<b>583</b>

\*Methodology note: Census proportions have been adjusted to include only Brent residents aged 13 and older.

## Gender identity

People engaged broadly matched the gender profile of the borough, based on the ONS Census data for 2021. (A small number of people chose to self-describe their gender.)

Gender Identity	2021 Census	All responses (Online + Outreach)
Female	51%	54%
Male	49%	46%
<b>Base</b>	<b>n/a</b>	<b>581</b>

## Disability

Almost a quarter of people engaged (22%) considered themselves to have a disability or health problem that affects their daily activities (459 people answered this question both online and in outreach).

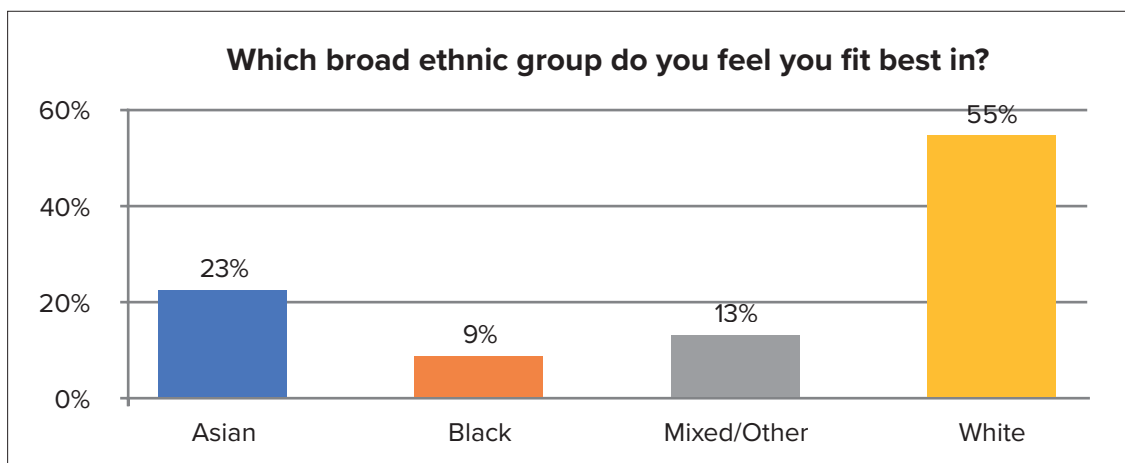
In a second question on the online survey, 21% of people stated that they had a physical or mental health condition or illness lasting or expected to last 12 months or more (357 people responded to this question).

According to the 2021 Census, 12% of Brent’s population has a long-term condition or disability which affects their day-to-day activities.

## Ethnicity

Overall, people who gave their views via outreach were from a wide range of backgrounds which reflected the diversity of the Brent population. However, the online respondents were predominantly White. The full ethnicity breakdown can be found in the following tables and chart.

Ethnicity	2021 Census	Outreach	Online	All responses (Online + Outreach)
Asian	33%	31%	18%	23%
Black	18%	17%	4%	9%
Mixed /Other Ethnicities	15%	18%	11%	13%
White	35%	34%	67%	55%
<b>Base</b>	<b>n/a</b>	<b>191</b>	<b>329</b>	<b>520</b>



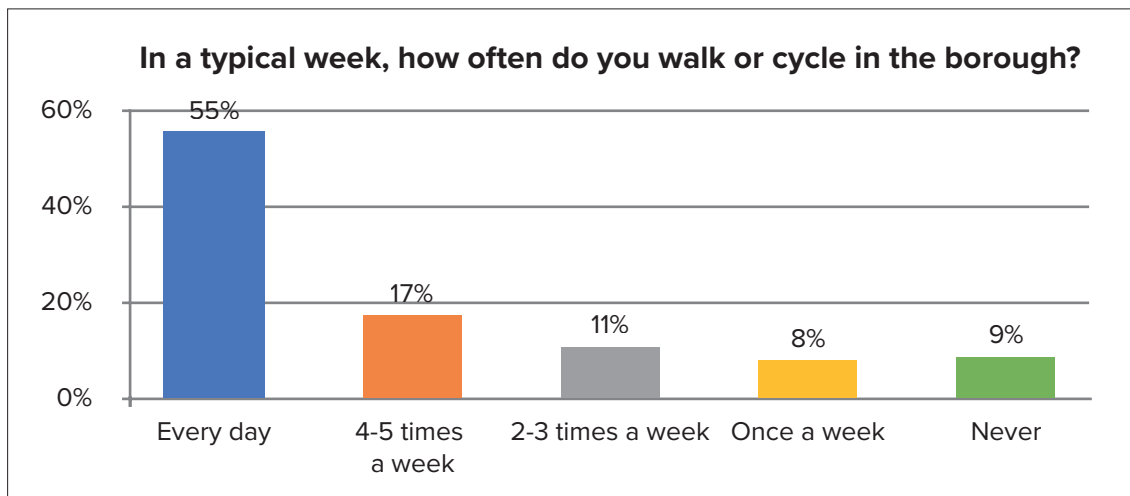
Base = 520

# What people said

## Views on walking and cycling in Brent

In the conversations with people in both outreach and online engagement, people were asked how often they walk or cycle in the borough.

- Over half of people walk or cycle every day and a little under a quarter between 4-5 times a week.
- There were no significant differences in views between those engaged online or through outreach, nor were there any significant differences in views between subgroups.

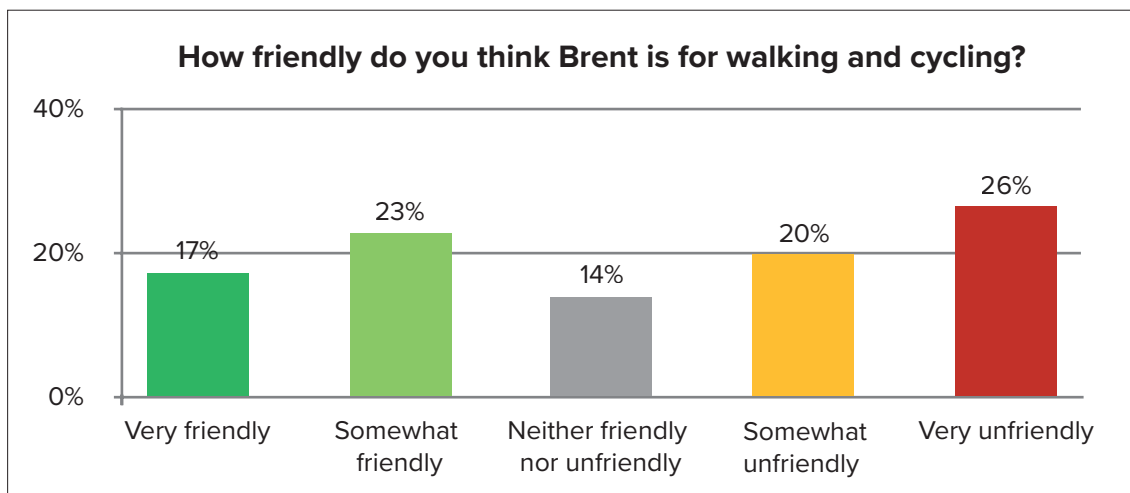


Base = 644

## How friendly Brent is for walking and cycling

In the conversations with people in both outreach and online engagement people were asked to rate how friendly they felt Brent was for walking and cycling.

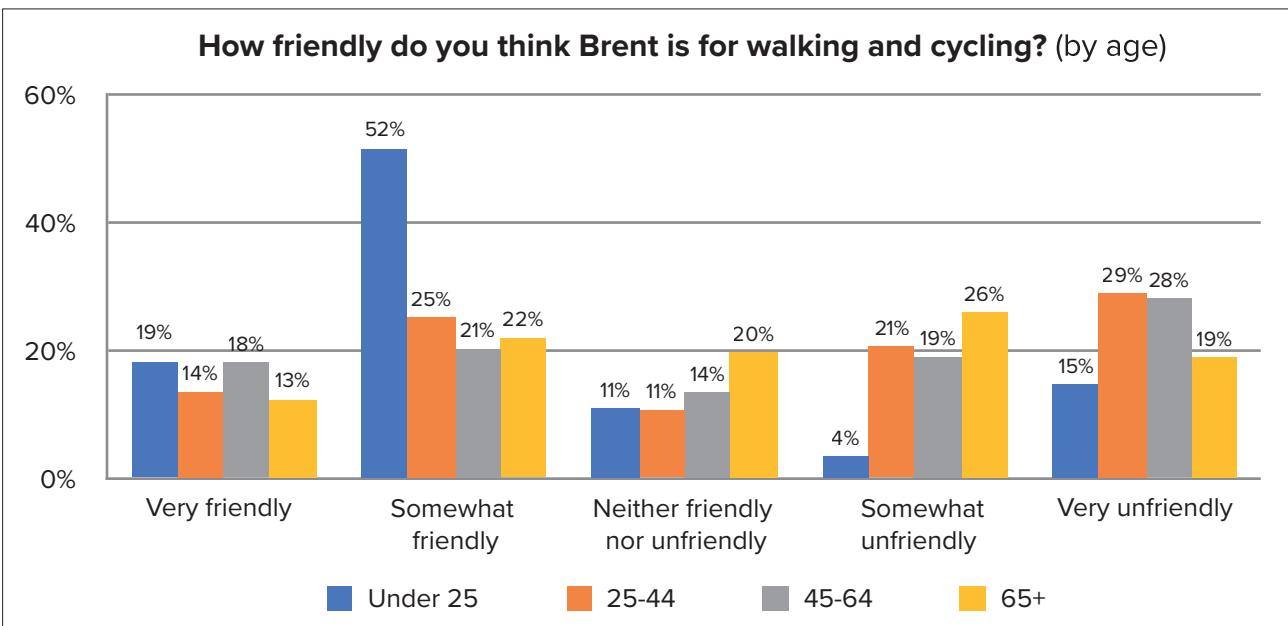
- Views were divided on this question with roughly equal numbers feeling Brent was friendly for cycling and walking, as those who felt it was un-friendly.



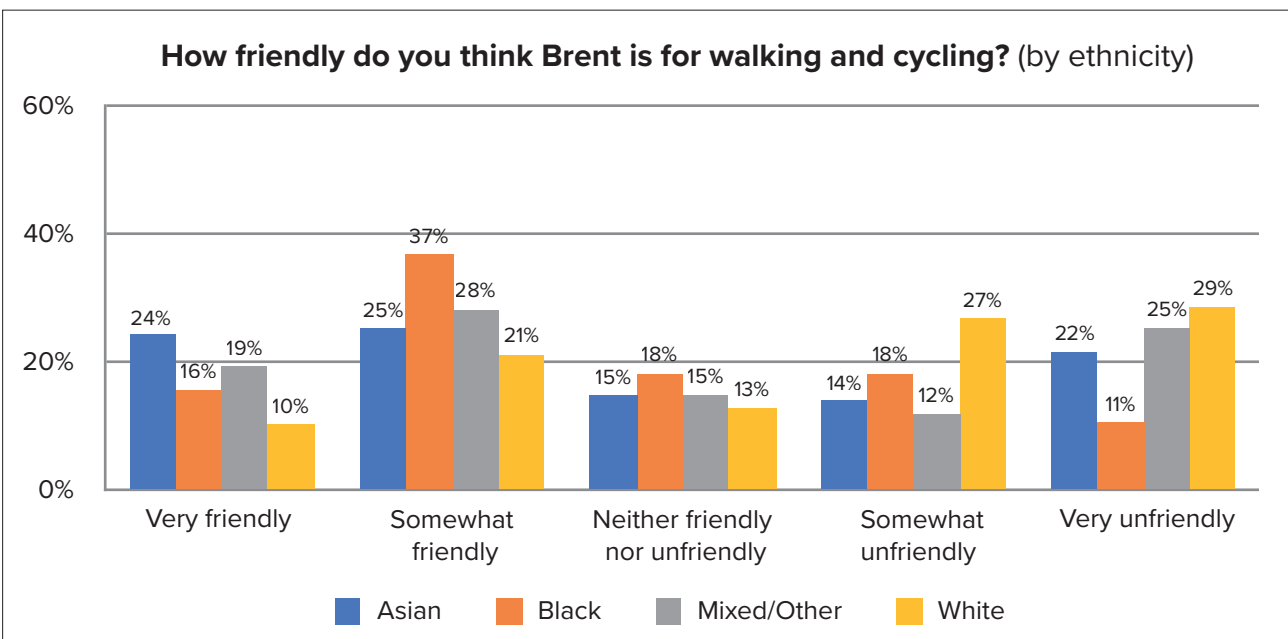
Base = 620



- There were differences in views between those reached through online engagement and those reached through outreach engagement.
  - People engaged in the outreach were more likely to think Brent was friendly for walking and cycling than those who responded online.
- There were also some differences in views between demographic subgroups though the main trend of views being divided was consistent for all groups.
  - The under 25's were more likely than other age groups to consider Brent friendly for walking and cycling.
  - There were no significant differences by gender.



Base = 554



Base= 492

There were 448 additional comments on this question. Comments covered a wide array of topics, some of which related to the friendliness of walking and cycling in the borough, and some of which expressed opinions about other topics related to walking and cycling. (This being the first space to make open comments in the survey, it appears that many people took advantage of the space to express opinions about cycling and walking in general.) The themes of these comments included:

- **Poor infrastructure and maintenance**, citing concerns about the state of pavements, potholes, and general disrepair. (Some people mentioned specific locations with infrastructure issues needing to be addressed.)
- **Safety concerns**, including **inadequate crossings and traffic management**, with numerous mentions of safety issues due to fast-moving traffic, inadequate crossings, and poor lighting, affecting both pedestrians and cyclists. **Dangerous behaviours** by drivers and other cyclists were also mentioned.
- **Need for improvements to cycling infrastructure**, including protected cycle lanes and secure bike parking.
- **Environmental and health concerns**, including concerns about pollution and its impact on outdoor activities, with particular concern for vulnerable groups such as asthmatics.
- **Misuse of public space**, with issues like litter, dog fouling, and illegal parking on pavements being highlighted as detriments to a pedestrian and cyclist-friendly environment. Relatedly, concerns around **vandalism and theft** were raised as issues affecting the willingness to cycle.
- **Conflict between cyclists and pedestrians**, with some residents feeling that the interests of pedestrians and cyclists can be at odds.
- **Accessibility issues**, highlighting the challenges for individuals with disabilities, the elderly, or those with strollers due to infrastructural issues. **Accessibility to public transport** was also mentioned, particularly the interaction between walking/cycling and public transport and the accessibility of stations and bus stops.
- Other comments mentioned wider themes such as broad support for, or opposition to, active travel as a priority for Brent.

*“I am happy walking in Brent, but I do not find it friendly for cycling, Camden and Westminster are better.”*

*“Pedestrian footway is a serious trip hazard in most part of the Borough with roots of trees coming up above the ground leaving paving slabs very uneven.”*

*“Too many pavements with broken slabs and too many potholes on the streets.”*

*“I walk and often feel unsure of my safety, pathways are narrow and dark and traffic is fast/loud.”*

*“There are people walking and cycling everywhere.”*

*“No idea why Brent designs a survey which lumps walking and cycling together, when cyclists are so inconsiderate of pedestrians/walkers and pose dangers by riding on footpaths and through pedestrian crossings?”*

*“For pedestrians walking in Harlesden on Craven Park Rd and High Street, it is an uncomfortable obstacle course of cars parked illegally on the footway and shops that are street trading narrowing the footway.”*

*“The pavements are in a terrible state (Chichele Road area and up to Willesden Green). This deters me and my wheelchair-using husband from using the pavements as they are dangerous for us both.”*

*“Not enough cycle lanes particularly in/around Queen’s Park. Lots of parking for cars, why not start a cycle lane?”*

*“It’s all perception, everything is friendly if you want it to be friendly”*

*“Brent has several barriers to active travel, especially cycling as it has poor infrastructure due to a lack of a network of protected cycle lanes and insufficiently traffic-calmed minor roads.”*

*“I don’t cycle but my partner does and he has never had any issues. I walk everywhere and never have any issues.”*

*“Your failure to recognise that encouraging cycling can conflict with the interests of walkers is concerning.”*

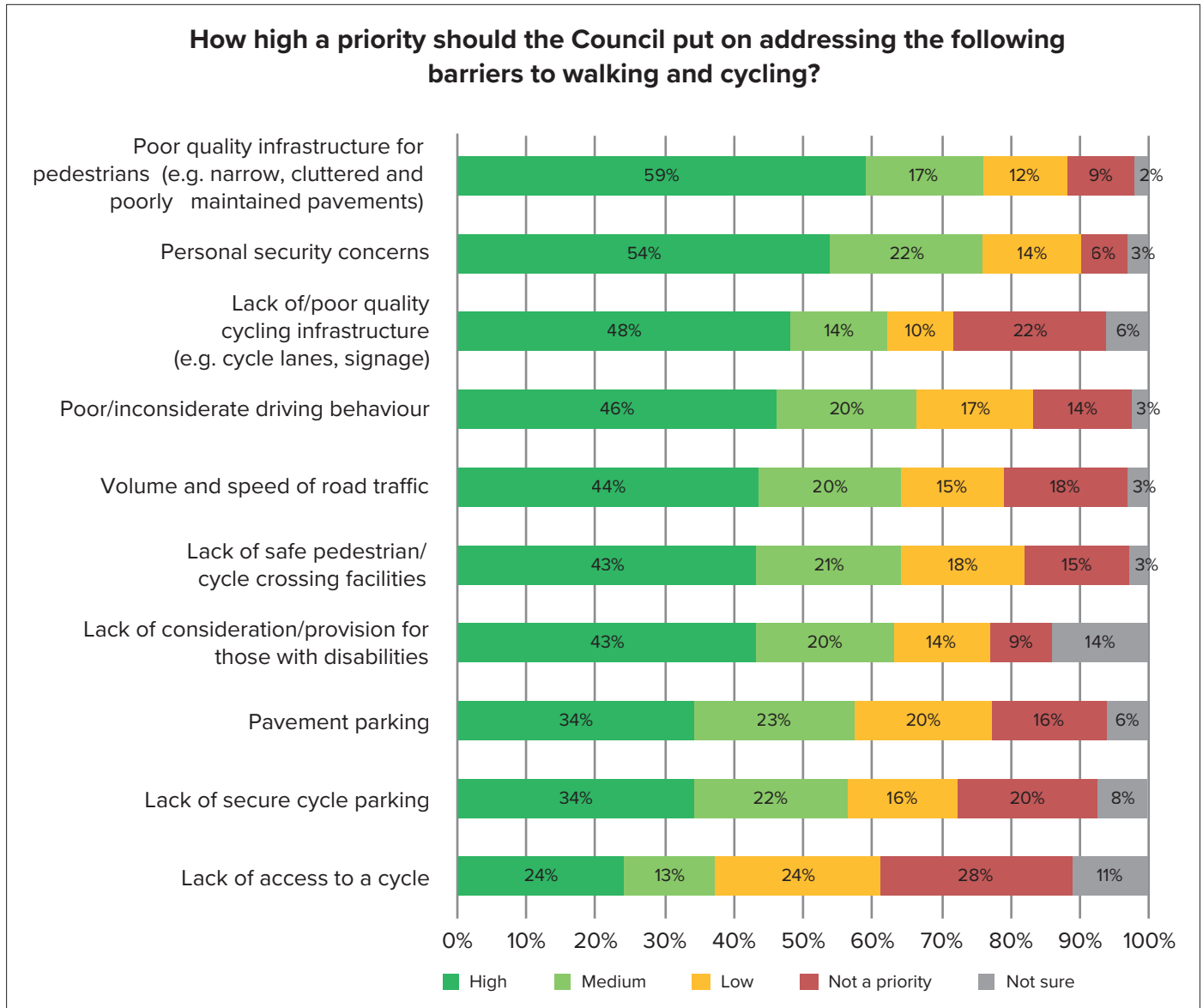
*“Not the best place to cycle. Walking’s okay, re cycling too many potholes in the roads.”*

*“Some days friendly some days URGH!”*

## Addressing the barriers to walking and cycling in Brent

In the outreach conversations and in online engagement people were asked to rank the extent to which Brent Council should prioritise addressing different barriers to walking and cycling.

- ‘Poor quality infrastructure for pedestrians’ and ‘personal security concerns’ were the most frequently highly ranked barriers, followed by ‘a lack of or poor-quality cycling infrastructure’, as shown in the chart below



Base = 645



448 people made additional comments around other barriers to walking and cycling that Brent Council should be addressing:

- **Cycling Infrastructure and Safety** - Many residents expressed concerns about the lack of safe cycling lanes and the danger posed by potholes and aggressive drivers. They suggested that more investment in cycling infrastructure, including segregated lanes and better road maintenance, could encourage cycling.
- **Pedestrian Infrastructure** – Some comments mentioned that uneven pavements, inadequate street lighting, and obstacles such as poorly parked bikes make walking unpleasant and sometimes dangerous, especially for the elderly and disabled.
- **Public Security and Antisocial Behavior** – Some comments referenced the fear of crime and antisocial behavior such as reckless driving and street drinking, which can discourage walking and cycling, especially at night.
- **Cycle Education and Access to bikes** - Some people expressed a desire for cycling proficiency courses to build confidence and the need for more affordable bikes.
- **Traffic and Parking Management** - Some comments mentioned the issue of cars parking on pavements or using cycle lanes; people suggested that better enforcement and management could improve conditions for walking and cycling.
- **Environmental Concerns** – Some people mentioned concerns about air quality and suggested that greener, more pleasant environments with less traffic could help promote walking and cycling.
- **E-bikes and Scooters** – Some people mentioned the improper parking and use of e-bikes and scooters on pavements and roads which can be a hazard or nuisance that needs more regulation.
- **Education and Awareness** – Some people mentioned the need for more education on road sharing and cycling safety, as well as a need to inform drivers about the presence and rights of cyclists and pedestrians.
- **Health and Exercise Opportunities** – A few people said they miss community health walks and would like more opportunities for exercise, and suggested that improving conditions for walking and cycling could address this.
- **Barriers for Disabled and Elderly** – Some comments raised the particular barriers faced by the disabled and elderly, highlighting the need for more considerate urban planning.

*“Many people tell me they won’t cycle in London because it’s too dangerous. I agree cyclist are unprotected on the roads and really don’t mix well with cars.”*

*“I can’t ride a bike, I know it’s embarrassing but I’m not ashamed, cycling lessons would be a plus!”*

*“The main problem stopping me enjoying walking in Brent is cyclists (not all, but many) who routinely ride on pavements, fail to stop at zebra crossings and cruise through red lights at pedestrian crossings.”*

*“Pot holes, those things are treacherous, honestly who would put their lives on the line?”*

*“Cycle lanes need to connect up with key areas (ie plans for the Roundwood area - there is no link with any of the surrounding stations of Harlesden, Willesden Junction or Dollis Hill, even though the high road by Willesden Magistrates/B&M area has wide roads and pavements with plenty of space to put bike lanes). Residents are being asked to pay for bike hangars - why not make residents who want to park their cars pay to subsidise bike hangars? Why do drivers get to park their cars which cause so much damage to those around them for free while cyclists are expected to pay for a small little secure corner for their bikes?”*

*“Road maintenance, it’s not just in Brent, Britain’s pothole crisis! My son was injured cycling and statistically it doesn’t seem to be improving.”*

*“Cycle lanes should be separate from pedestrian walkways and vehicles as sometimes I feel cyclists think they have right of way on footpaths and inconsiderate towards motorists.”*

*“Winter time and falling leaves, havoc for walkers especially the elderly! That’s a barrier.”*

*“Adult cycling lessons - Some people i.e. me need something to entice them back to the roads. How does the Council address this issue?”*

*“Deliveroo people getting in the way of elderly & infirm.”*

*“Dangerous drivers. I had a man repeatedly overtake me and brake hard, trying to knock me off my bike because he was angry that I didn’t dismount and let him past on an earlier narrow street.”*

*“If you want more people to cycle you need to fill in the potholes in the carriageways throughout the borough. Brent should ensure that when third parties like Virgin or Thames Water dig up pavements and carriageways, they restore them to a useable standard which lasts for years rather than makeshift jobs which result in manhole covers collapsing into the carriageways and indentations arising in the tarmac after weeks of use.”*

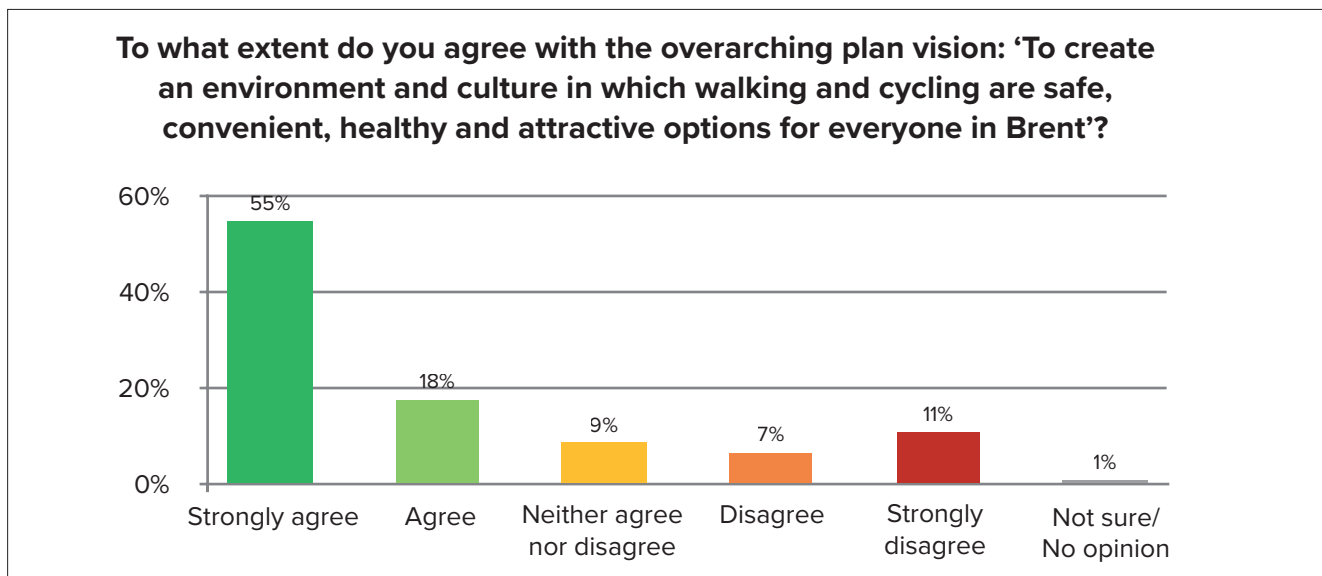
*“Design, aesthetics - e.g. front garden planting should be encouraged and architecture should be more attractive to create more appealing environments for walkers and probably a much safer and happier community.”*

## Views on the draft vision and priorities for active travel

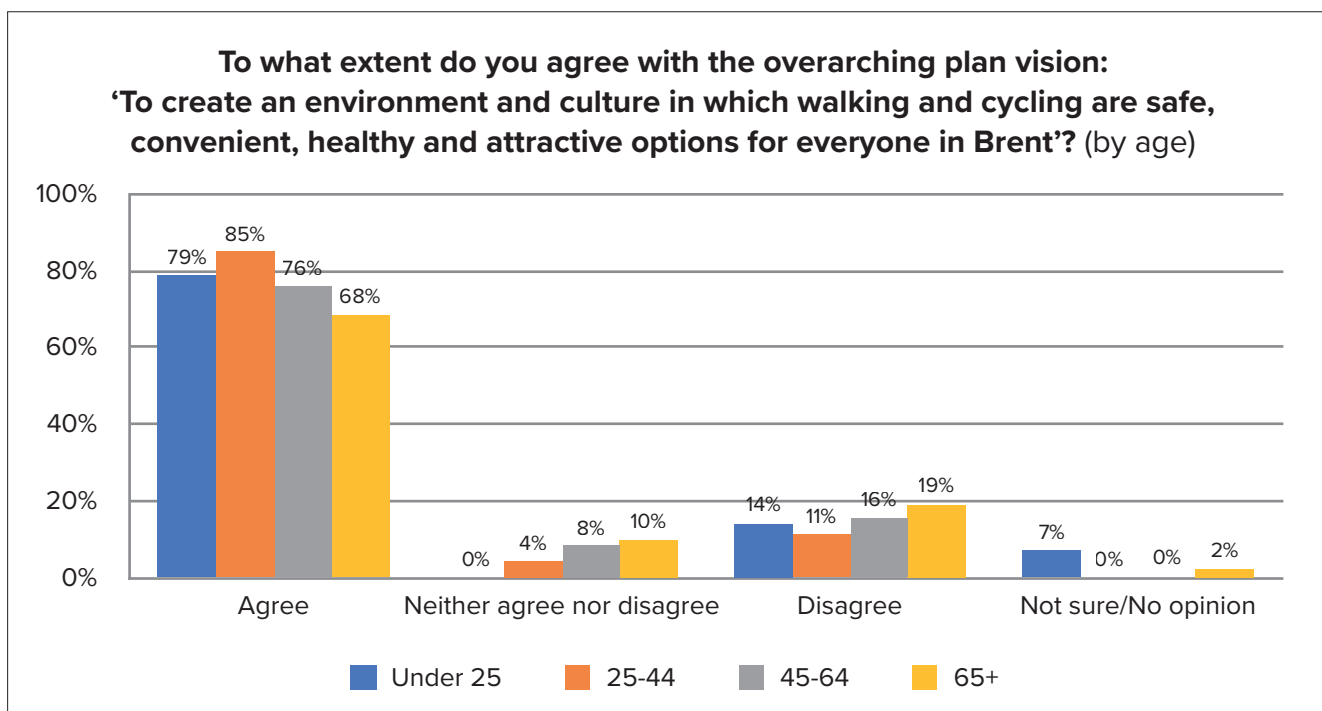
### Views on the ATIP vision statement

People were asked about the extent to which they agreed with the overarching draft ATIP vision to create an environment and culture in which walking and cycling are safe, convenient, health and attractive options for everyone in Brent.

- Almost three quarters of people either *strongly agreed* or *agreed* with the vision
- There were no significant differences in views between those engaged online or through outreach, nor were there any significant differences in views between subgroups



Base = 648



Base=578

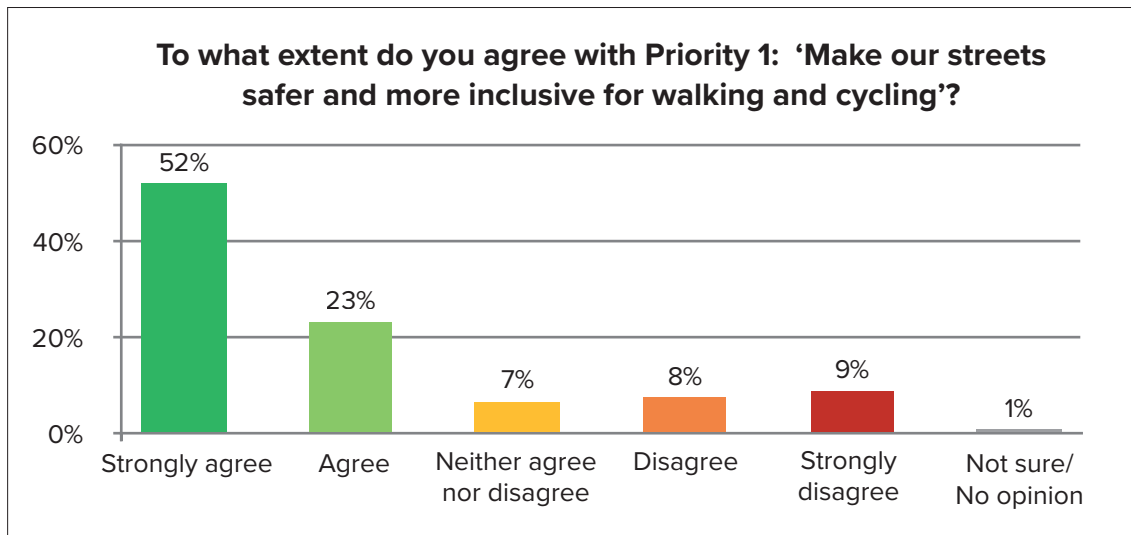
## Views on the ATIP priorities

People were asked about the extent to which they agreed specifically with the three priority areas within the ATIP. The 3 priorities were:

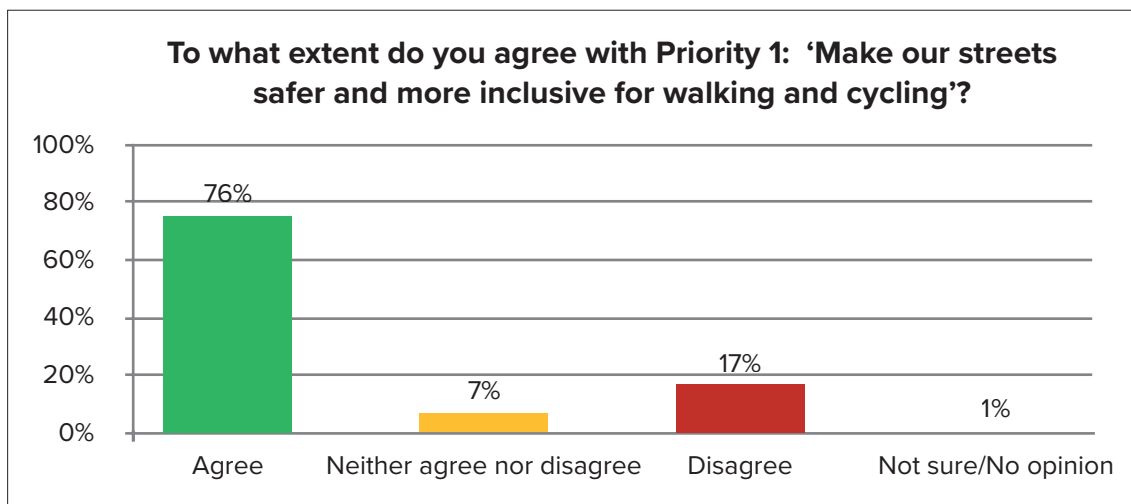
- Priority 1: Make our streets safer and more inclusive for walking and cycling
- Priority 2: Improve the quality and visibility of our walking and cycling infrastructure
- Priority 3: Equip our communities with the confidence and means to walk and cycle

### Priority 1: Make our streets safer and more inclusive for walking and cycling:

- Three quarters of people *agreed* or *strongly agreed* with Priority 1
- Only 17% of people either *disagreed* or *strongly disagreed* with Priority 1
- There were no significant differences in views between those who shared views online or through outreach engagement on this priority or between demographic subgroups

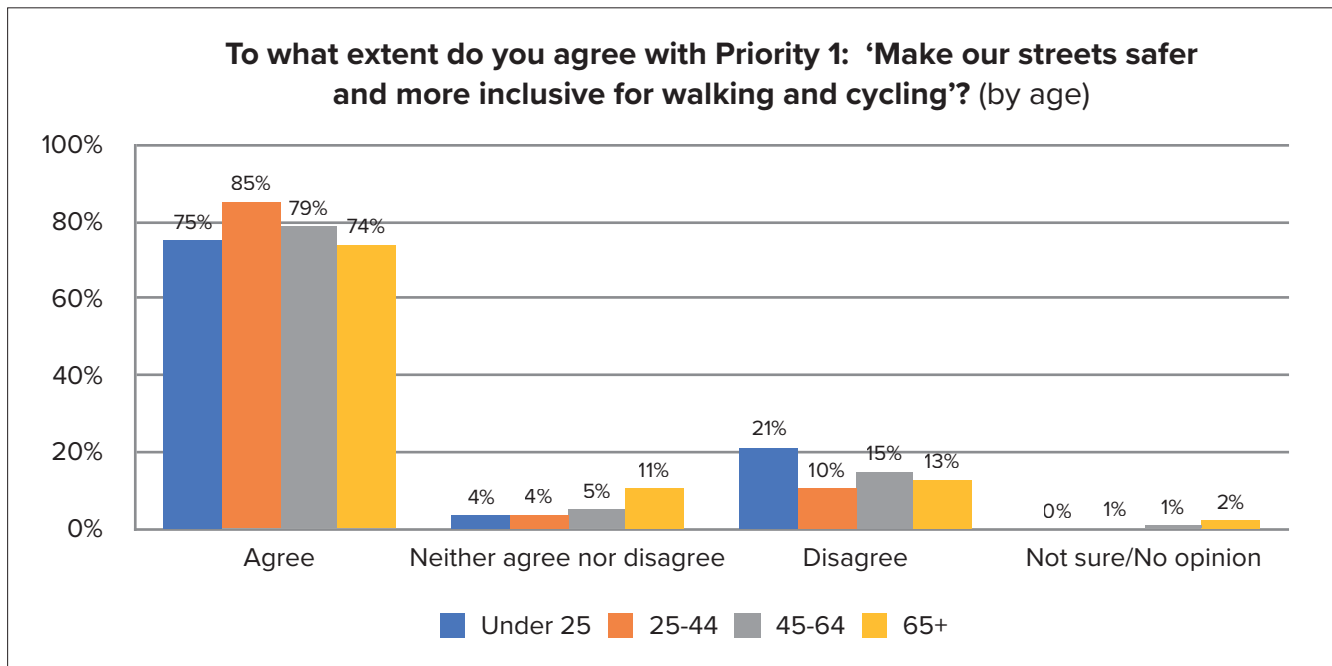


Base = 652



Base = 652

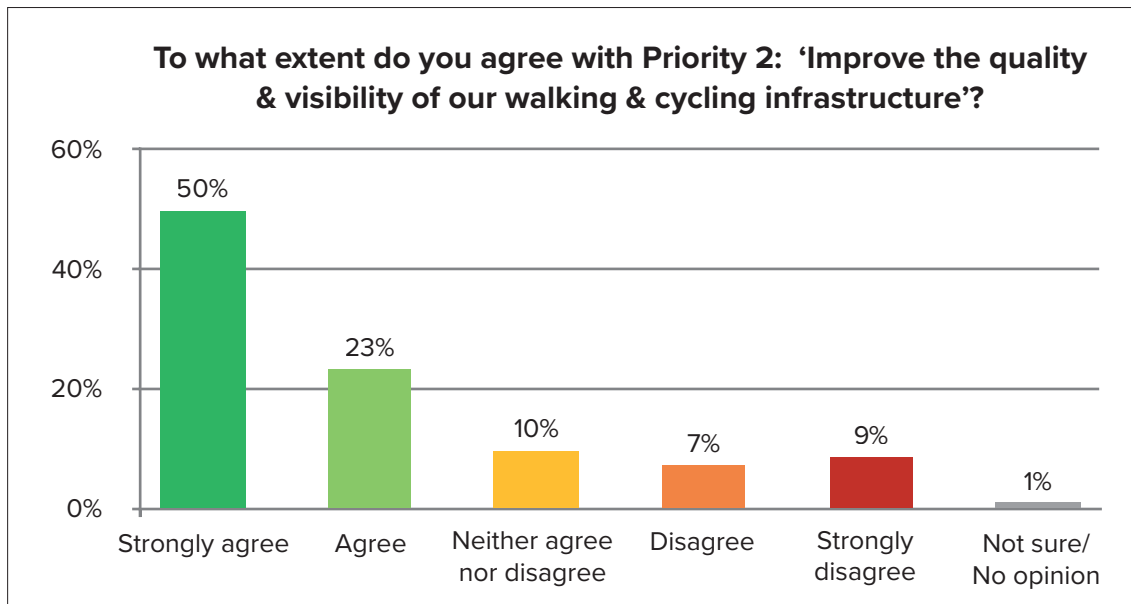




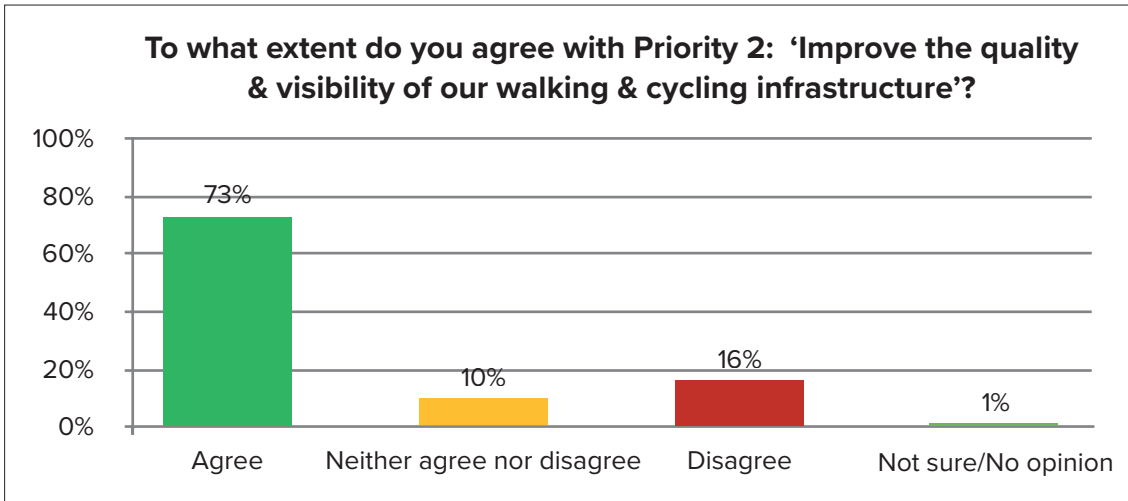
Base=582

**Priority 2: Improve the quality and visibility of our walking and cycling infrastructure:**

- Almost three quarters of people *agreed* or *strongly agreed* with Priority 2
- Only 16% of people either *disagreed* or *strongly disagreed* with Priority 2
- There were no significant differences in views between those who shared views online or through outreach engagement on this priority or between demographic subgroups



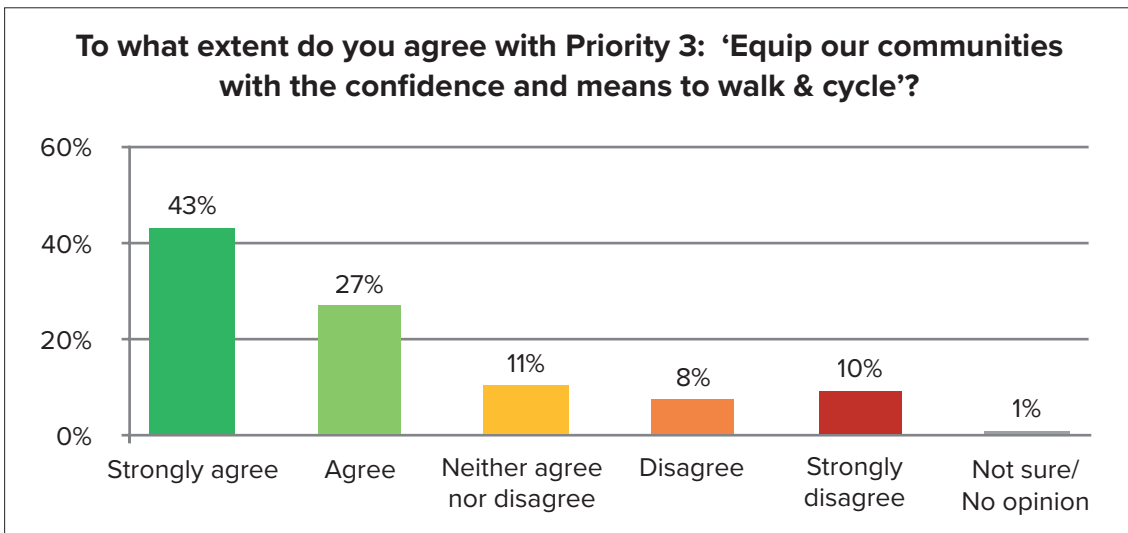
Base = 652



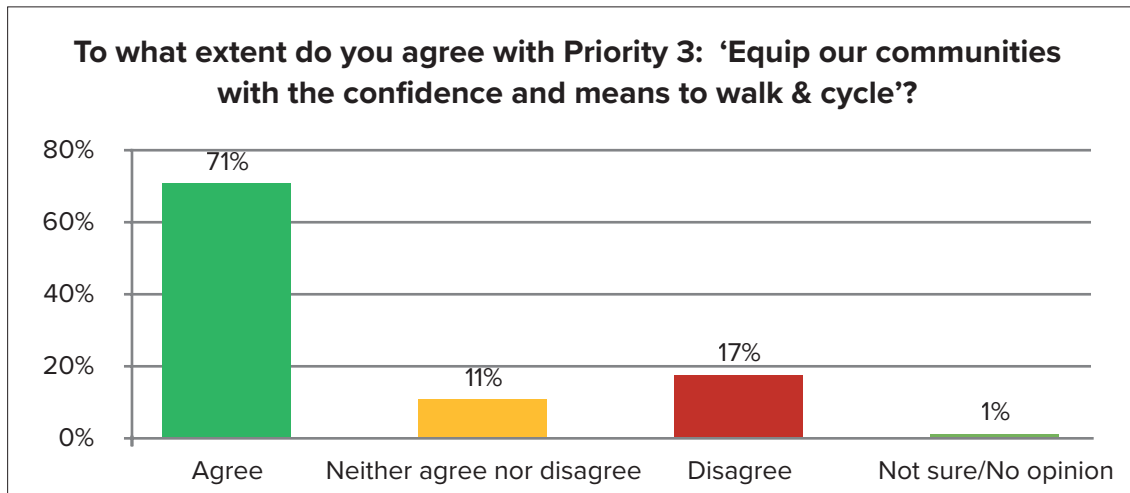
Base = 652

### Priority 3: Equip our communities with the confidence and means to walk and cycle

- A little under three quarters of people *agreed* or *strongly agreed* with Priority 3
- Only 17% of people either *disagreed* or *strongly disagreed* with Priority 3
- There were no significant differences in views between demographic subgroups
- There was some difference between the views of those who shared views online and in outreach engagement in relation to priority 3
  - 63% of the online group agreed with Priority 3, and 22% of them disagreed
  - 88% of those engaged through outreach agreed with Priority 3, with only 6% disagreeing



Base = 653



Base = 653

Overall people from both the online and outreach engagement were largely in agreement with the priority areas proposed for Brent’s Active Travel Implementation Plan. 305 people made additional comments around the draft plan vision and priorities:

- Over a quarter of people who left a comment stressed the need to **make streets and pavements safer for pedestrians**. Many people in this theme stressed the need to prioritise fixing uneven surfaces, potholes and repairing damage. Some people spoke about abandoned bikes and scooters obstructing paths, as well as parked cars. Others stressed the need to prioritise more regular street cleaning to remove litter and leaves. A small number of people mentioned feeling unsafe walking at night and suggested the need for improved street lighting.
- Around one in five comments mentioned the importance of **encouraging cycling** in the borough, stressing the need for safer cycling infrastructure like dedicated segregated bike lanes, secure bike parking and improved connectivity between cycle routes. Some spoke to the importance of education and training programmes to promote safe cycling, while others suggested introducing maintenance and repair stations to improve accessibility.
- Over one in ten said they were **concerned about the Council wasting money and resources** on incentives that did not have tangible impacts. A small number of comments said they were particularly worried about resources being wasted on cycle schemes.
- About one in ten comments expressed broad support, without offering specifics.
- A few people highlighted the need to **reduce crime and antisocial behaviour**. Several people emphasised enforcing road rules, speeding fines, CCTV monitoring and policing to make pedestrians, cyclists and motorists feel safer.
- A few people mentioned the plan needing to **account for those with disabilities and the elderly**. Suggestions included making pavements wide enough for wheelchairs; adding more benches for people to rest; and accommodating for disabled parking and driving access. A small number of comments said that penalising driving disproportionately affects the elderly and those who cannot use public transport.
- A small number of people, around one in twenty, **disliked the plan’s tendency to penalise drivers and motorists**. Several people said that restricted access to parking and extended Low Traffic Neighbourhoods frustrate drivers.
- The remaining comments voiced various other concerns, such as the need to make driving inconvenient; the need for public transport to be improved; the need for other services such as housing and healthcare to be prioritised over transport; the need for improved education in schools about transport and concerns linked to traffic and parking restrictions. A few people also voiced frustration at having walking and cycling addressed together, asserting they have separate needs.

*“Glad you have this vision, please get on and implement this as quickly as possible.”*

*“Don’t forget that many drivers are reliant on cars for mobility. The policies set out could leave the less able and elderly stuck at home. Cycling is for the fit minority and those without children.”*

*“Pedestrians face obstacles like hundreds of unlicensed shop signs, goods, stalls and low level overhanging umbrellas on the pavements. The pavements are also uneven and slippery. Also pedestrians have cyclists and scooter users cycling straight at them on the pavement even where there are already existing cycle lanes and when the roads are empty. The new LED street lights put the light onto the road not onto the pavement leaving many dark areas in alleys and large forecourts where you don’t feel safe at night.”*

*“I very strongly disagree with any attempts of the local council to further wage a misguided war on motorists. Many people need their cars for work, shopping, leisure etc. It is not the job of a local council to tell people how to live their lives.”*

*“We need safe places to leave bikes near stations etc. We need to be able to purchase bikes at a reasonable price.”*

*“I think the biggest barrier preventing people from choosing to cycle rather than take the car is the lack of infrastructure and lack of addressing dangerous road behaviours, which unfortunately still makes cycling very scary.”*

*“Make it safe for children to walk or bike to school.”*

*“Everything has to be watched on CCTV. More signs and warnings for disrespecting the law. Bigger fines and watch their speeding and bigger fines for going on pavements on motorbikes fast near pedestrians. Bigger fines for speeding on residential roads risking safety.”*

*“Most of us are pedestrians AND motorists, some like myself are also keen cyclists. Do not try to pit these groups against each other as in many cases we are the same people. If you generally make the roads better then cycling will be better too. Some people will NEVER EVER cycle so don’t bother wasting resources on trying to get them to cycle. Spend that money on fixing the roads and pavements, it’s really that simple.”*



*“This all needs to be done in tandem with making driving /inconvenient/ - make it slow, expensive and difficult to park and more people will choose cycling and public transport.”*

*“For these changes to have a meaningful effect, there needs to be consultation with neighbouring boroughs to ensure that people travelling from Brent to Camden, for example, aren’t left with a cycle route or pedestrian path that stops at the borough boundary.”*

*“Ensure the public transport network is efficient so people do not feel the need to drive.”*

*“Fix pavements especially for wheelchairs.”*

*“Infrastructure is much more important than cycle training.”*

*“Good priorities the vision is inclusive which is important. Brent is very multi-cultural.”*

*“Visions are great and they will change cultures and the wellbeing of communities. Keep up the good work.”*

*“Pavements just not wide enough. People park on pavement as no parking. It’s not safe to cycle so hard to encourage cycling.”*

*“If you make the roads safer, slower and crack down harder on aggressive drivers/parkers, the environment for pedestrians and cyclists will benefit greatly. The car driver has become too dominant in our modern world, to drive a private vehicle is a privilege that should be appreciated not abused.”*

*“I think there are other higher priorities for Brent such as cleaner streets.”*

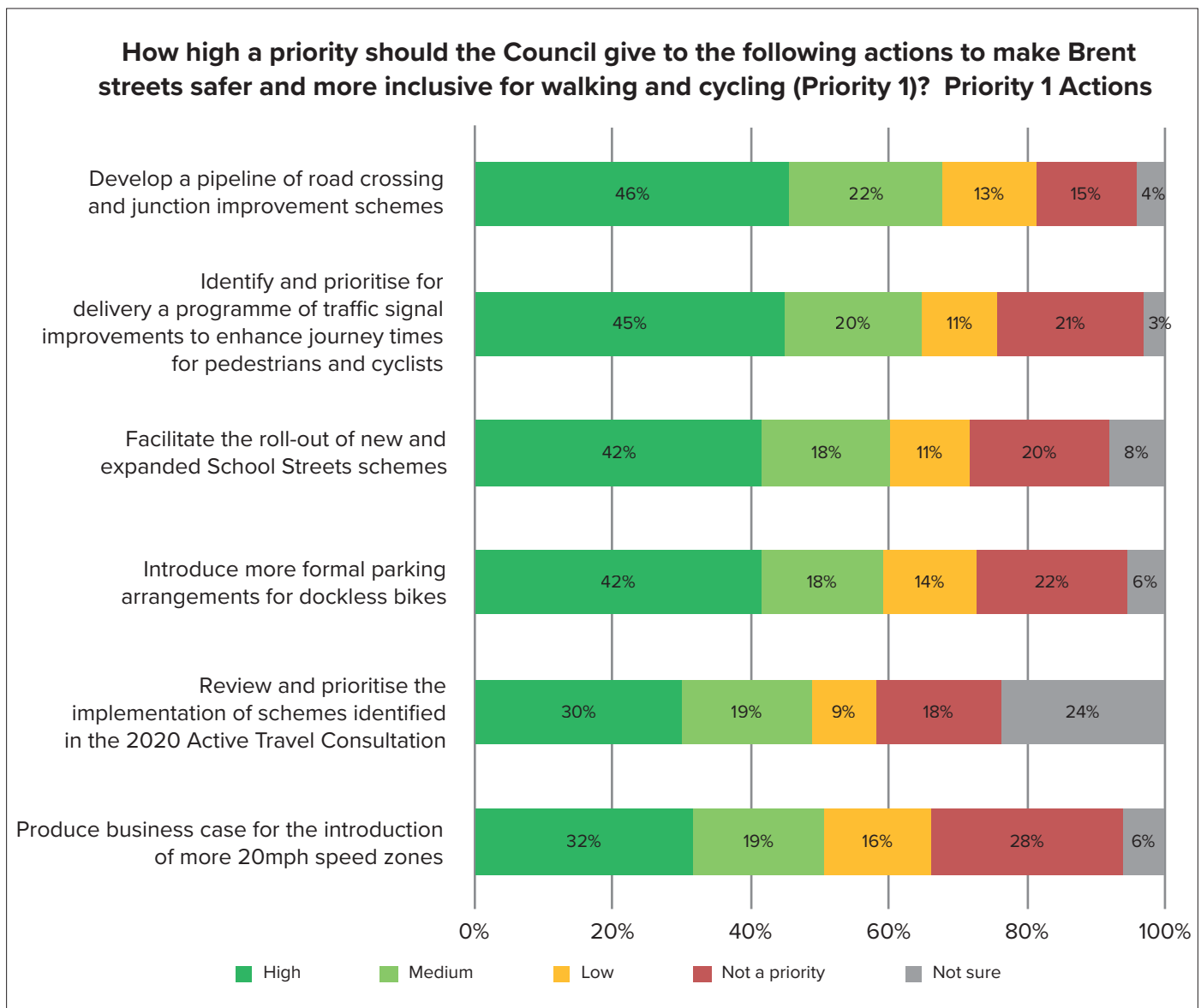
*“I’m not convinced that LTNs are effective in reducing car use. They seem to displace traffic onto routes that are already overwhelmed, which is a nightmare for those who have to live and work on our busiest streets.”*

## Views on proposed measures and interventions

People were asked to rank the level of priority for a range of proposed actions, measures and interventions that could achieve Brent Council’s Active Travel aims and objectives.

### Priority 1: Make our streets safer and more inclusive for walking and cycling:

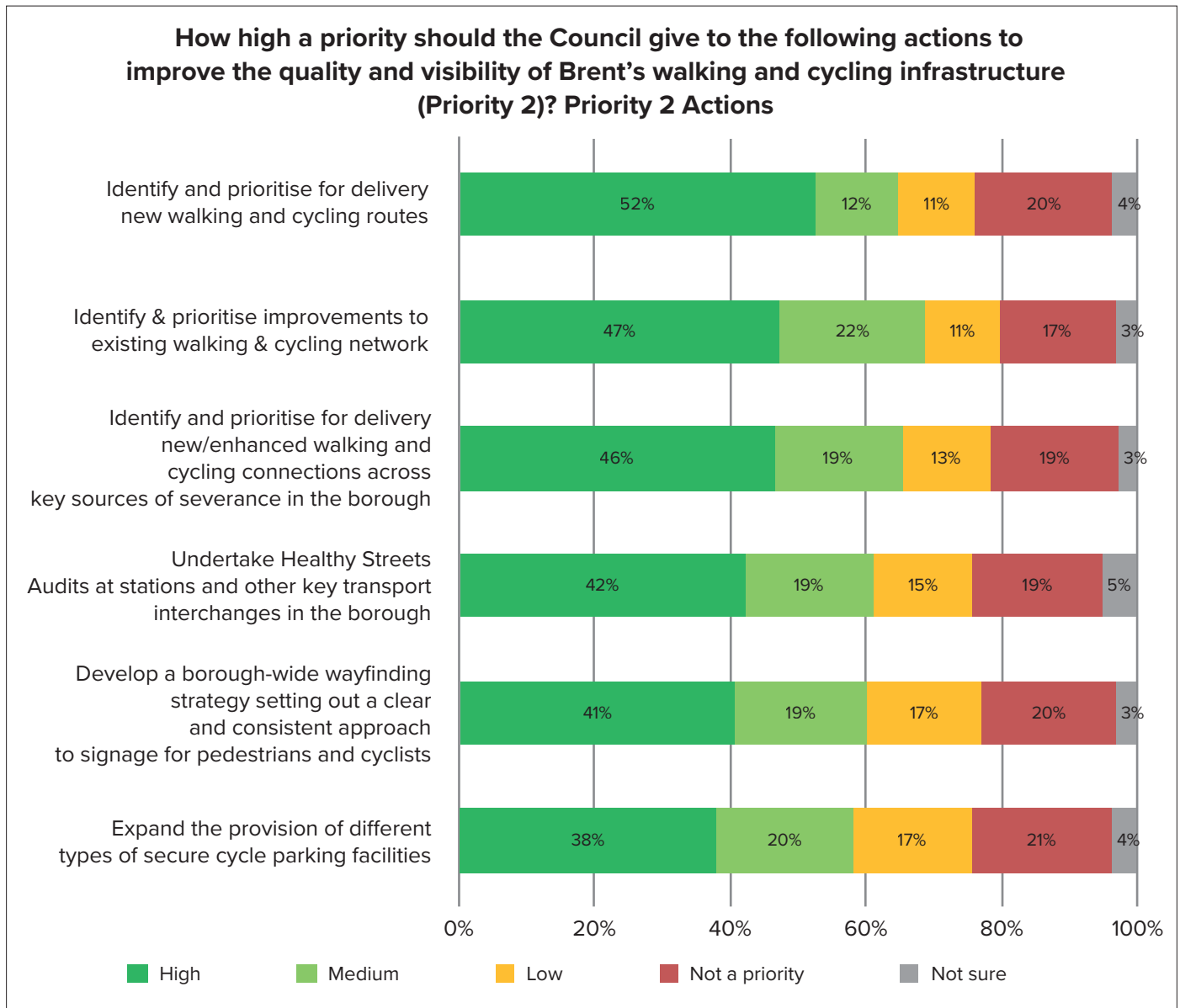
- All of the proposed actions were viewed as being a priority by a majority of people.
- The proposal to ‘develop a pipeline of road crossing and junction improvement schemes’ was the most commonly ranked high priority.
- The second highest ranked action was to ‘identify and prioritise for delivery a programme of traffic signal improvements to enhance journey times for pedestrians and cyclists’.
- There were some differences in views between different sub-groups but these were not overly significant and the general trends of views were similar for all groups.



Base = 644

## Priority 2: Improve the quality and visibility of our walking and cycling infrastructure:

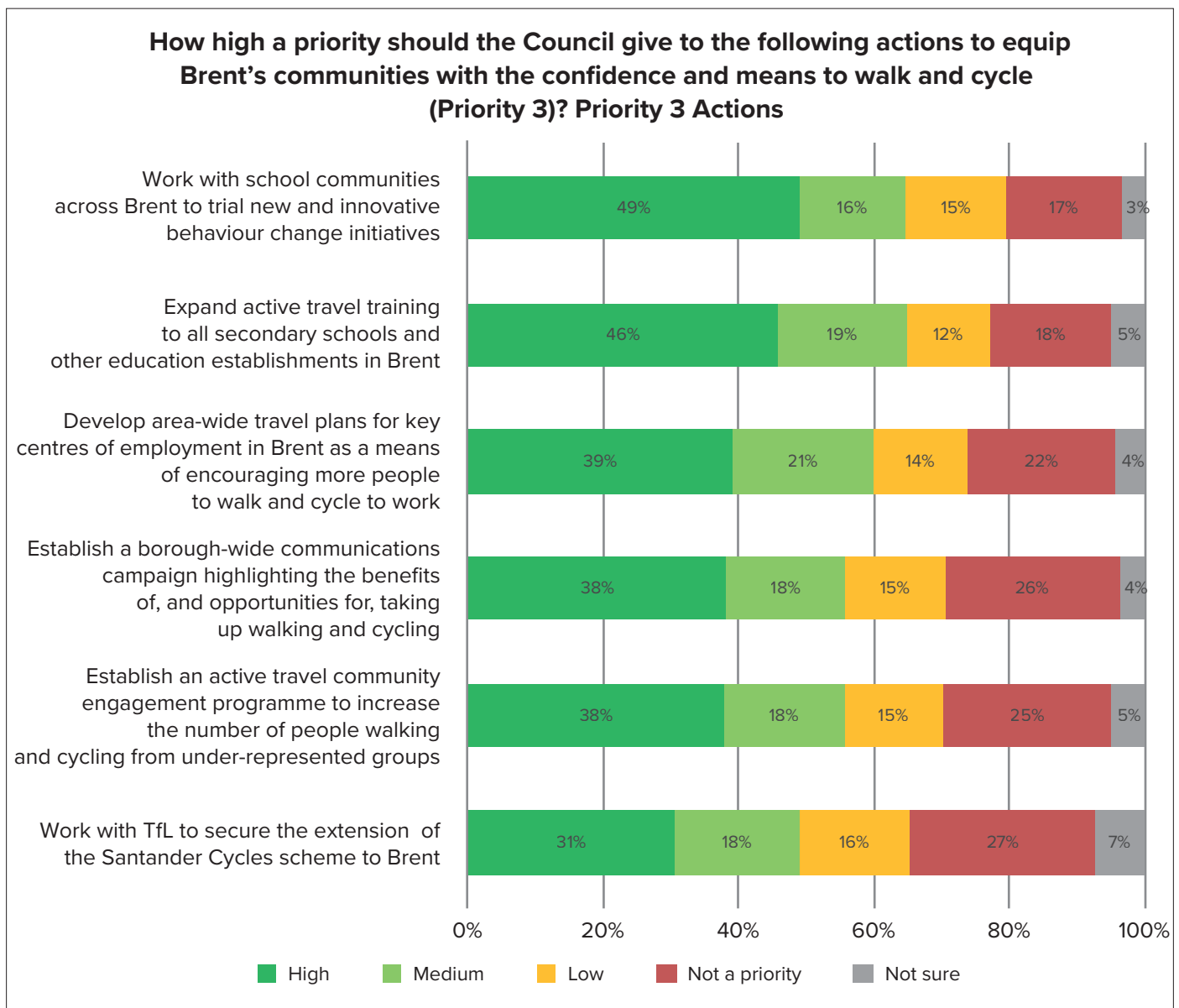
- All of the proposed actions were viewed as being a priority by a majority of people.
- Over half of people ranked highly ‘identify and prioritise for delivery new walking and cycling routes’.
- Almost half of people ranked the proposal to ‘identify and prioritise improvements to existing walking and cycling networks’ as being a high priority.
- There were some differences in views between different sub-groups but these were not overly significant and the general trends of views were similar for all groups.



Base= 644

### Priority 3: Equip our communities with the confidence and means to walk and cycle:

- All of the proposed actions were viewed as being a priority by a majority of people.
- About half of people ranked ‘work with school communities across Brent to trial new and innovative behaviour change initiatives’ as a high priority.
- Almost half of people ranked the proposal to ‘expand active travel training to all secondary schools and other education establishments in Brent’ as being a high priority.
- There were some differences in views between different sub-groups but these were not overly significant and the general trends of views were similar for all groups.
  - The only notable difference was between people who shared views online versus in outreach; those in outreach ranked all actions as higher priorities than those who shared their views online.



Base = 641



## Other measures, interventions or actions

When asked what other measures, interventions or actions the Council should consider that would help to achieve the Active Travel aims and objectives, 365 people made additional comments:

- Just under one in three people who left a comment suggested different **incentives for cycling**. These suggestions included subsidising bike hire schemes, providing concessions on bike purchases, offering adult cycling training and setting up free bike maintenance hubs. A small number of people thought the Council should consider giving away free bike tools and accessories, while others suggested funding cycling clubs in schools and workplaces.
- Around one in eight comments stressed that the focus should be on **fixing the poor state of roads and pavements** to improve safety for all users. Several people said this was important to prevent trip hazards and improve accessibility. A small number of people mentioned the need for trimming hedges and grass in parks, as well as removing overgrown trees, especially those growing on pavements.
- About one in ten proposed **enforcing road rules for cyclists and motorists**. Some people suggested enforcing regulations to stop cyclists and scooters riding on pavements, such as increasing signs and improving CCTV. Others proposed improving existing laws for motorists including the 20mph speed limit, and enforcing parking violations, phone use and noise pollution.
- One in twelve people highlighted the problem of **abandoned rental bikes and scooters**. Several of these comments flagged that dockless rental bikes are often left obstructing pavements, creating hazards for those with disabilities, the elderly, and parents with buggies. A small number of people suggested banning electric bikes and scooters completely.
- A few people raised concern about **traffic and disruption** in Brent, mentioning the negative impact of building works, widened pavements and unused cycle lanes on congestion. Some of these comments praised the introduction of Low Traffic Neighbourhoods (LTNs) and others suggested the enforcement of no-parking corridors.
- A few people said that addressing **safety** was an essential part of encouraging people to walk or cycle, with some suggesting that more police presence was needed. Some comments also mentioned behaviours of motorists, cyclists, or pedestrians as safety concerns.
- Finally, a small number of people said that the Council should consider **improving public transport**. A few people suggested making sure buses are safe and others highlighted the lack of evening and night tubes. Many comments under this theme stressed the need to make public transport cheaper. A small number of comments suggested introducing school buses for children and young people.
- The remaining comments voiced various other suggestions, including prioritising cleanliness and litter removal; introducing incentives for walking; improving public transport; focusing on education for young people in schools; enforcing parking restrictions; and taking into account those with disabilities or the elderly.

*“Make sure that the new cycle route and connections are designed to a very high standard. Some of the routes that the council has implemented are not to a high standard and are not separated from cars, so the road traffic does not respect them.”*

*“Enforce existing 20mph speed limits - we regularly see aggressive car drivers doing over 40mph in 20mph zones.”*

*“Focus on improving roads by resurfacing them, repairing potholes properly by using decent contractors and repairing uneven pavements. All of which will be significantly cheaper than any new initiatives that the council are thinking whilst ignoring the real challenges.”*

*“TfL needs to have a robust system of bus travel so people do not feel the need to keep a car. If a bus comes as and when it pleases, not enough buses every hour then people feel the need to keep a car and not use public transport.”*

*“Too many of these [e-bikes] are being vandalised and just left in the middle of the pavement, across people’s driveways, thrown and abandoned on the road sides.”*

*“Brent [Council] have stopped regular automatic street cleaning, which spoils any walk as seeing litter and debris along the way is depressing.”*

*“Coordinate digging up roads better so that the same few roads are not constantly under construction- which means temporary traffic lights and massive traffic jams for weeks on end.”*

*“No visual or audible crossing indicators for the visually and audibly impaired despite the erection of the Uncle towers.”*

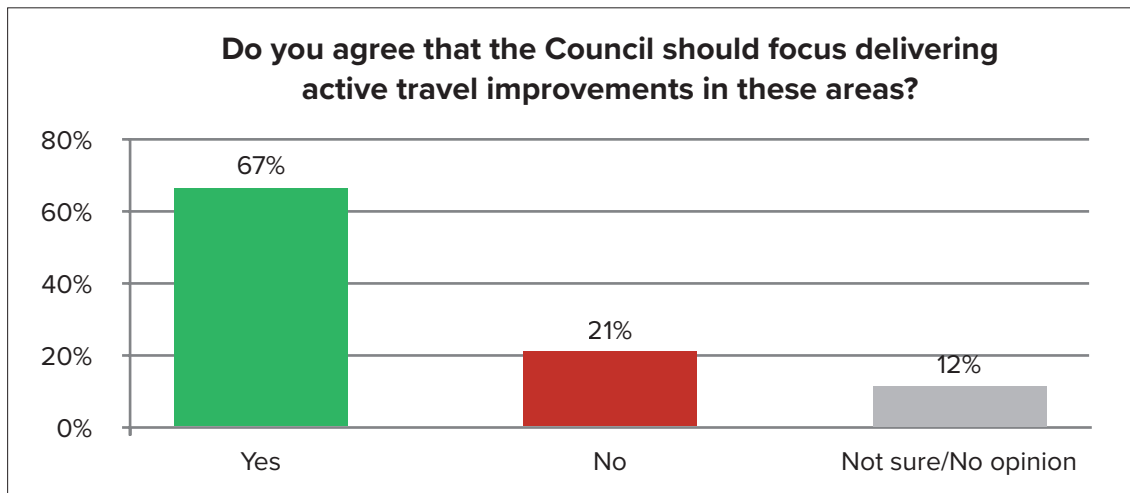
## Which types of areas to focus on

People in both the outreach and online engagement were asked if they agreed that Brent Council should focus on delivering the Active Travel Improvement Plan in six identified key areas:

- major town centres,
- other busy locations in the borough,
- schools and other educational facilities,
- stations and other public transport interchanges,
- local neighbourhoods (including ‘Brents Green Neighbourhoods’), and
- Air Quality Focus Areas.

Of the 649 people who responded to this question, almost three quarters agreed with the Council focusing on delivering the active travel improvement in the above identified key areas.

There were no significant differences in views between those engaged online or through outreach, nor were there any significant differences in views between subgroups.



Base = 649

When asked if there are other areas where the Council should focus delivering active travel improvements, 207 people made comments. Of these, 96 mentioned specific geographic areas, while the others made comments about other topics which they felt should be prioritised.

The geographic areas that were mentioned were as follows. Some were mentioned more than once, but none were mentioned more than six times:

**Broad areas:**

- “A” or “B” classified roads in Brent
- Areas near mosques, temples, libraries, schools or hospitals
- Areas around new housing developments / new tower blocks
- Areas around overground / underground stations
- Cycle routes and connections, including connecting cycle routes to other boroughs / city centre
- Connecting streets
- Economically deprived areas
- Main road cycle lanes and filtering minor streets
- Major routes which cycling routing apps such as google maps will commonly direct cyclists through the borough
- Parks and public space entry points
- Whole borough should be prioritised

**Specific areas:**

- A406/North Circular Road transition
- A5 (cycle superhighway)
- Brent Cross
- Brondesbury Park
- Camden (on the border)
- Carlton Avenue East junction
- Chamberlayne Road
- Christchurch Avenue
- Church Lane

- Church Street
- Civic Centre to Oakington Manor Drive walking route
- Cricklewood
- Dollis Hill
- Draycott Avenue / Windermere Avenue junction
- Ealing Rd
- Edgware road
- Finchley Road
- Harlesden
- Harlesden Road
- Harrow Road
- Kensal Rise
- Kenton
- Kenton Station
- Kilburn
- Kilburn Blackspot
- Kilburn High Road
- Kilburn High Road + Cricklewood Broadway
- Kilburn high road area (near Quex road)
- Kingsbury
- Lonsdale Road and Paddington Old Cemetery
- Monks Park
- Neasden near North circular
- Neasden roundabout towards Birchen Grove
- Network Rail
- North Circular
- Outside of Wembley
- Queens Park
- Slough Lane
- Sudbury & Harrow
- Walm Lane
- Wembley
- Wembley High Street
- Wembley to Willesden Junction corridor
- Willesden
- Willesden Green
- Willesden Green High Rd
- Willesden Green/Dollis Hill
- Willesden Junction
- Windermere Ave



The other comments mentioned included these broad themes:

- General agreement with the key areas as described in the outreach materials.
- Other barriers to walking and cycling (which broadly parallel the barriers discussed in an earlier question), including parking and traffic management, safety issues, public transport, accessibility, air quality, and crime.
- Other priorities, not relating to active travel.

## Any other comments

There were 316 comments on the question of ‘any other views or suggestions on how walking and cycling in Brent could be improved’.

A wide variety of suggestions were made, broadly mirroring the suggestions and concerns raised in previous questions. Themes included:

- Improving safety and security
- Suggestions for infrastructure improvements
- Concerns relating to parking and traffic management
- Accessibility and inclusivity
- Enforcement of regulations
- Concern around prioritisation of funding in the Council
- General support of draft plan
- Hope that the Council will deliver on the actions in the draft plan

*“It’s fantastic to see Brent’s Active Travel Implementation Plan!”*

*“A Cycle Superhighway on the A5 to the city!”*

*“Encourage kids to walk to school, which will help with child obesity & reduce the local traffic.”*

*“Just build segregated cycle paths and people will start cycling of their own free will! It really is that simple and probably cheaper in the long run.”*

*“Recommendations here need to become a reality, not just lip service so Brent can be seen as doing something.”*

*“Anything that will reduce motorised traffic would be a bonus. I’m sorry that there is opposition to LTNs.”*

*“As I cycle around, I find that where the Council has painted bicycle signs on roads considered safer for cyclists, cars appear to drive with more consideration for cyclists. The signs maybe remind them that we are sharing this space?”*

*“Don’t waste money on little used cycle lanes.”*

*“Be bolder in your actions! Improving active travel is key and are popular measures!”*

*“Fix pavements, fix all the potholes. Remove the ridiculous 20mph zones except for where there are schools. Remove the stupid road closures for schools. These are all just ways of you taking our money. Just stop please.”*

*“Incentivise residents - people love their cars! So it’ll have to be something to motivate them.”*

*“Free cycle & lesson for Borough residents.”*

*“Brent council should deliver on its basic services (garbage and recycling, road and sidewalks maintenance, and security) rather than wasting its budget on this. Stop trying to distract everyone from your poor service level with new initiatives that regularly end up being a complete waste of money.”*

*“I originally hasn’t considered my personal safety a barrier to walking, but I think that’s because as a woman I am used to being accosted or followed by men when I’m near Willesden Green station or the high street especially after about 10pm, and at this point I have a plan B and C in my mind at all times.”*

*“Completely separate cycling lanes from the main roads please - to avoid accidents & traffic.”*

*“I think that these improvements will be great for the borough, but would like to see more anti-car measures added.”*

*“Invest in road and pavement infrastructure, invest in more greenery and in the high street. These are things that will encourage residents to walk and cycle, and maybe even shop in their own town centre, which will also help to revive failing high streets such as in Willesden Green.”*

*“Promote walking on footpaths that can not be used by cyclists.”*

*“The draft plan appears to be promising however Brent must ensure its successful implementation through prioritisation of key elements and continued engagement with the community, particularly those underrepresented.”*

*“Make walking about in the evenings feel safer.”*

*“Partnering with local bicycle shops to provide road safety & cycle maintenance workshops/gain confidence.”*

*“The plan is a welcome step towards improving cycling and walking in Brent. However, it lacks commitment to monitoring the proposed schemes and maintaining them to ensure they are fit for purpose. This has been a significant weakness in previous plans.”*

*“Please invest in new and additional cycle infrastructure which is the best and most effective way to get more people cycling on the road.”*

## Views from Stakeholder Groups

The following external stakeholder groups and organisations sent in a response to the strategy:

- Transport for London (TfL)
- Sudbury Court Residents' Association (SCRA)
- Brent Cycling Campaign (BCC)

The complete comments are appended to this report (see Appendix 3), but here are a few main points from the stakeholder responses:

- **Transport for London** broadly supported the plan, but also provided a formal schedule of comments. These include:
  - A recommendation to emphasise the importance of cleaner, streets pavements and street lighting and welcome continued close collaboration on any LB Brent schemes to improve road crossings and junctions on the Strategic Road Network.
  - TfL want more reference in the plan to ensuring that walking and cycling infrastructure is safe (and perceived to be safe) and attractive during all times of the day.
  - TfL also wanted more reference to the provision of high-quality cycle parking in new developments that are coming forward.
  - TfL welcome the recognition that 'crime' and 'fear of crime' within public realm are barriers to active travel and suggest that this link directly to the Mayor's Strategy on Violence Against Women and Girls in particular commitment 1.4.
  - TfL recommend the plan links to the outcomes of the Night Safety Audits being completed within Brent by MOPAC and TfL
  - TfL suggest that the plan would also benefit of linking to the public realm guidance issued by the GLA with the plan adopting the language on 'perception of safety' and the document's aspirations to underpin good public realm design – *GLA Good Growth By Design: Designing Public Realm for Women, Girls and Gender Diverse*.
  - TfL suggest a gender inclusive objective is included or gender is mentioned within interventions. Consulting with women and girls on barriers to active travel should also be a key element.
  - TfL suggest the plan consider 'night' as a significant barrier to active travel which needs addressing.

*“The Mayor is implementing world leading policies to improve air quality in London, including through the promotion of walking, cycling and use of public transport. For this to work for women and girls, public spaces need to be safer, and women and girls need to feel safe when using them.”*

*“MOPAC, working with TfL and other partners, will continue to implement the UN Safe City scoping report recommendations to support women and girls. This includes exploring and piloting night safety audits in town centres, transport hubs and other public spaces across London with an understanding of how these experiences may be different on the basis of individual characteristics such as disability, neuro-divergence and race.”*



- **Sudbury Court Residents' Association (SCRA)**

- Overall SCRA were supportive of the active travel plan and shared some suggestions, including a request that footways are made flat to facilitate better access to walking and cycling.
- SCRA also suggested that Electric Vehicle charging cables can obstruct walk ways, and said that this ought to be addressed as part of the active travel plan.

*“Have additional concerns around the design of the new footway crossovers - would like these to be flat to facilitate comfortable walking and wheeling.”*

*“Would like the Council to ban/enforce the trailing of EV charging cables across pavements.”*

- **Brent Cycling Campaign (BCC)**

- Overall BCC were in support of the active travel plan.
- BCC suggest that the plan remove the language of ‘BAME’ which is advised by the UK Government to no longer be used.
- BCC suggest that wheelchair users be considered in the plan to include recognition that footways must be constructed as flat.
- BBC suggest that the plan uses the term ‘enable’ people to walk rather than ‘encourage’ to make clear the responsibility of Brent Council.
- BCC offered suggestions to Brent around how to use parking revenue to enable walking and cycling.
- For BCC having a disability is no considered a barrier to cycling, rather they suggest the barrier be understood as a lack of appropriate, inclusive infrastructure.
- Like TfL, BCC recommend that the plan refer to data and reports around women and girls safety, such as Lime’s report on women cycling safety.

*“[The active travel plan] correctly identifies many of the benefits of active travel, both on an individual and societal level. It clearly identifies many of the problems caused by an excess of motor traffic. It has identified the potential to significantly expand levels of active travel and shows ambition to do so, as well as reducing motor vehicle dominance in the borough.”*

*“We fully appreciate the financial constraints that the council is operating under. We would recommend that parking revenue is also included as a funding source towards active travel.”*

The following internal council officers also sent in a response to the plan:

- **Principal Tree Officer, Brent Council**

- Suggested that there could be more mention of the role of trees in continuing to make more attractive, safer, and more inclusive walking and cycling routes.

*“It would certainly help me in the drafting of the Tree Strategy to link positively with the ATIP if there was just some mention of trees.”*

*“Trees can help to segregate cycle and walking routes from roads, they provide shading along routes and resting points and help with removal of particulates from the atmosphere on key transport corridors.”*

- **Principal Transport Planner, Brent Council**

- Suggested that there be more focus on low traffic neighbourhoods in the plan.
- Suggested more engagement with community centres and care homes to support the elderly to choose the appropriate cycle schemes.
- Suggested more engagement with different groups in the community.

# Conclusions and reflections

Because of the large number of people who gave their views on the draft ATIP, and the fact that those engaged (particularly in the outreach) were a reasonable representation of Brent population, the council can have confidence in the findings.

While it is never likely that everyone will agree with a draft strategy, in this consultation there was a high level of approval for what the council was proposing as well as for the draft ATIP vision and priority areas.

Across all sub-groups there were majorities in favour of the vision, the priorities and the proposed actions and so the council can take confidence from this and move forward to implement the plan knowing it has the broad backing from Brent residents.

# Appendix 1 – Consultation materials

**Plan vision**

To create an environment and culture in which walking and cycling are safe, convenient, healthy and attractive options for everyone in Brent

**Plan priorities**

<p><b>1.</b></p> <p><b>Make our streets safer and more inclusive for walking and cycling</b></p> <p>Reduce motor vehicle dominance and put the needs of pedestrians and cyclists first</p>	<p><b>2.</b></p> <p><b>Improve the quality and visibility of our walking and cycling infrastructure</b></p> <p>Implement walking and cycling infrastructure that is fit for purpose and accessible to all</p>	<p><b>3.</b></p> <p><b>Equip our communities with the confidence and means to walk and cycle</b></p> <p>Provide our residents with access to appropriate support, training and equipment</p>
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**Actions**

Priority 1: Make our streets safer and more inclusive for walking and cycling	Priority 2: Improve the quality and visibility of our walking and cycling infrastructure	Priority 3: Equip our communities with the confidence and means to walk and cycle
Review and prioritise the implementation of schemes identified in the 2020 Active Travel Consultation.	Identify and prioritise improvements to the existing walking and cycling network.	Establish an active travel community engagement programme to increase the number of people walking and cycling from under-represented groups.
Facilitate the roll-out of new and expanded School Streets schemes.	Identify and prioritise for delivery new walking and cycling routes.	Work with school communities across Brent to trial new and innovative behaviour change initiatives.
Produce a business case for the introduction of more 20mph speed zones.	Identify and prioritise for delivery new/enhanced walking and cycling connections across key sources of severance in the borough.	Develop area-wide travel plans for key centres of employment in Brent as a means of encouraging more people to walk and cycle to work.
Develop a pipeline of road crossing and junction improvement schemes.	Expand the provision of different types of secure cycle parking facilities across the borough.	Expand active travel training to all secondary schools and other education establishments in Brent.
Introduce more formal parking arrangements for dockless bikes operating in the borough.	Develop a borough-wide wayfinding strategy setting out a clear and consistent approach to signage for pedestrians and cyclists.	Establish a borough-wide communications campaign highlighting the benefits of and opportunities for taking up walking and cycling.
Identify and prioritise for delivery a programme of traffic signal (traffic lights) improvements to enhance journey times for pedestrians and cyclists.	Undertake Healthy Streets Audits at stations and other key transport interchanges in the borough to identify opportunities for active travel improvements.	Work with TfL to secure the extension of the Santander Cycles scheme to Brent.




**PRIORITY AREAS FOR IMPROVEMENTS**

Active travel measures and interventions will be implemented throughout the borough. However, in recognition that the nature and scale of transport challenges – and barriers to active travel - vary significantly across Brent, there will be a particular focus on the following key areas:

Key area	Examples / Explanation
Major town/employment centres	e.g. Wembley, Alperton, Neasden, Willesden, Kingsbury, Harlesden, etc.
Other busy locations in the borough	e.g. local health, shopping and leisure facilities
Schools and other education facilities	
Stations and other public transport interchanges	
Local neighbourhoods (including Brent’s ‘Green Neighbourhoods’)	<i>A Green Neighbourhood is an area that is eco-friendly, has reduced carbon emissions and waste and is a healthier place to live, work and visit.</i>
Air Quality Focus Areas	Areas identified as having high levels of pollution and human exposure.

# Appendix 2 – Consultation survey



**Brent Active Travel Implementation Plan – Community Questionnaire**

- How many years have you had a connection to Brent?** <1  1-2  3-4  5-9  10-19  20+
- In a typical week, how often do you walk or cycle in the borough?**  
 Every day  4-5 times a week  2-3 times a week  Once a week  Never  Prefer not to say
- How friendly do you think Brent is for walking and cycling?**  
 V friendly  Somewhat friendly  Neither friendly nor unfriendly  Somewhat unfriendly   
 V unfriendly  Not sure   
 Comment/explain more: \_\_\_\_\_

**ADDRESSING THE BARRIERS TO WALKING AND CYCLING IN BRENT**

- How high a priority should the Council put on addressing the following barriers to walking and cycling?** [rate high / medium / low / not a priority / not sure]  
 Lack of/poor quality cycling infrastructure (e.g. cycle lanes, signage) \_\_\_\_\_  
 Lack of secure cycle parking \_\_\_\_\_ Lack of safe pedestrian/cycle crossing facilities \_\_\_\_\_  
 Poor quality infrastructure for pedestrians (e.g. narrow, cluttered and poorly maintained pavements) \_\_\_\_\_  
 Volume and speed of road traffic \_\_\_\_\_ Poor/inconsiderate driving behaviour \_\_\_\_\_ Pavement parking \_\_\_\_\_  
 Personal security concerns \_\_\_\_\_ Lack of access to a cycle \_\_\_\_\_  
 Lack of consideration/provision for those with disabilities \_\_\_\_\_
- Are there any other barriers to walking and cycling in Brent that the Council should be addressing?**  
 \_\_\_\_\_  
 \_\_\_\_\_

**OUR VISION AND PRIORITIES FOR ACTIVE TRAVEL** [show vision and priorities]

- To what extent do you agree with the overarching plan vision: ‘To create an environment and culture in which walking and cycling are safe, convenient, healthy and attractive options for everyone in Brent’?**  
 Strongly agree  Agree  Neither agree nor disagree  Disagree  Strongly disagree  Not sure
- To what extent do you agree with Priority 1: ‘Make our streets safer and more inclusive for walking and cycling’?**  
 Strongly agree  Agree  Neither agree nor disagree  Disagree  Strongly disagree  Not sure
- To what extent do you agree with Priority 2: ‘Improve the quality & visibility of our walking & cycling infrastructure’?**  
 Strongly agree  Agree  Neither agree nor disagree  Disagree  Strongly disagree  Not sure
- To what extent do you agree with Priority 3: ‘Equip our communities with the confidence and means to walk & cycle’?**  
 Strongly agree  Agree  Neither agree nor disagree  Disagree  Strongly disagree  Not sure
- Do you have any other comments on the plan vision or priorities?**  
 \_\_\_\_\_  
 \_\_\_\_\_

**DELIVERING IMPROVEMENTS** [show actions]

- How high a priority should the Council give to the following actions to make Brent streets safer and more inclusive for walking and cycling (Priority 1)?** [rate high / medium / low / not a priority / not sure]

Priority 1 Actions	High	Med	Low	Not a priority	Not sure
Review and prioritise the implementation of schemes identified in the 2020 Active Travel Consultation.					
Facilitate the roll-out of new and expanded School Streets schemes.					
Produce business case for the introduction of more 20mph speed zones.					
Develop a pipeline of road crossing and junction improvement schemes.					
Introduce more formal parking arrangements for dockless bikes					
Identify and prioritise for delivery a programme of traffic signal improvements to enhance journey times for pedestrians and cyclists.					

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**12. How high a priority should the Council give to the following actions to improve the quality and visibility of Brent’s walking and cycling infrastructure (Priority 2)? [rate high / medium / low / not a priority / not sure]**

Priority 2 Actions	High	Med	Low	Not a priority	Not sure
Identify & prioritise improvements to existing walking & cycling network.					
Identify and prioritise for delivery new walking and cycling routes.					
Identify and prioritise for delivery new/enhanced walking and cycling connections across key sources of severance in the borough.					
Expand the provision of different types of secure cycle parking facilities					
Develop a borough-wide wayfinding strategy setting out a clear and consistent approach to signage for pedestrians and cyclists.					
Undertake Healthy Streets Audits at stations and other key transport interchanges in the borough					

**13. How high a priority should the Council give to the following actions to equip Brent’s communities with the confidence and means to walk and cycle (Priority 3)? [rate high / medium / low / not a priority / not sure]**

Priority 3 Actions	High	Med	Low	Not a priority	Not sure
Establish an active travel community engagement programme to increase the number of people walking and cycling from under-represented groups.					
Work with school communities across Brent to trial new and innovative behaviour change initiatives.					
Develop area-wide travel plans for key centres of employment in Brent as a means of encouraging more people to walk and cycle to work.					
Expand active travel training to all secondary schools and other education establishments in Brent.					
Establish a borough-wide communications campaign highlighting the benefits of, and opportunities for, taking up walking and cycling.					
Work with TfL to secure the extension of the Santander Cycles scheme to Brent.					

**14. Are there any other measures, interventions or actions you think the Council should consider that will help to achieve the Active Travel aims and objectives?**

**PRIORITY AREAS FOR IMPROVEMENTS** [show key areas]

**15. Do you agree that the Council should focus delivering active travel improvements in these areas?**

Yes  No  Not sure/No opinion

**16. Are there any other areas in Brent where you consider the Council should focus delivering active travel improvements?**

**ABOUT YOU**

**17. How much have your views been consulted before?**

A lot  Quite a bit  A little  Not much  Not at all

**18. Age** <25  25-34  35-44  45-54  55-64  65-74  75+  Prefer not to say

**19. Do you consider yourself to be disabled?** Yes  No  Prefer not to say

**20. Which ethnicity do you feel best describes you?** \_\_\_\_\_ Prefer not to say   
Which broad ethnic group do you feel you fit best in? Asian  Black  Mixed heritage  White  Other

**21. Gender Identity:** Male  Female  Prefer not to say  Prefer to Self-describe

**22. What is the first part of your postcode?** [e.g. HA0. NW10] \_ \_ \_ \_

**23. Do you have any other views or suggestions on how walking and cycling in Brent could be improved?**

--	--

Area: Sudbury  Kingsbury  Harlesden  Kenton/Norwick Pk  Willesden Green  Queen’s Park  Neasden  Stonebridge Park   
Location of Interview \_\_\_\_\_ Date \_\_\_\_\_ Interviewer \_\_\_\_\_

# Appendix 3 – Stakeholder responses

## Transport for London (TfL)

### TfL response to LB Brent Draft Active Travel strategy - Dec 2023

#### TfL Investment Delivery Planning comments:

- Improved pedestrian environment / experience can encourage people to walk more. Cleaner, safer streets, improved crossing facilities and street lighting to make walking safer. We would like to emphasise the importance of cleaner, streets pavements and street lighting (Harlesden is a good example)
- Cycling needs safer streets and secure parking facilities
- 20mph streets (mentioned in Key Action 3) are important
- Choosing cycle parking locations and type of cycle parking which are visible and convenient will reduce cycle theft and discourage antisocial behaviour. From experience we know cyclists wouldn't use a cycle parking at the location even with CCTV. They would prefer locations that are visible and close to their destination / interchanges
- Re: Figure 3.5; Brent have been provided with LIP funding for Safer Corridors and Neighbourhoods, cycle parking, and cycle training. (LB Brent does not have any active Liveable Neighbourhood schemes)
- We would welcome continued close collaboration on any LB Brent schemes to improve road crossings and junctions on the Strategic Road Network / Transport for London Road Network.

#### TfL Spatial Planning comments:

- It would be good if the document made more references to ensuring that walking and cycling infrastructure is safe (and perceived to be safe) and attractive during all times of the day. For development schemes within Brent, we have been asking that they undertake night-time ATZ assessment to ensure the active travel environment is just as attractive during darker hours as it is during the day
  - We note the Council have identified that they are undertaking a review of the existing walking and cycling network in the borough. MOPAC and partners, including TfL, are conducting a localised women's night safety audit on the Cycle Future Route 23 Wembley to Harlesden, and it may be beneficial to replicate elements of the methodology in this audit within the borough-wide audit noting comments made about safety and the perception of safety as being a barrier to active travel within the document.
- It would also be good to ensure that the document refers to the provision of high-quality cycle parking in new developments that are coming forward. Recently, there have been a few developments in which poor quality cycle parking has been proposed which in turn can impact on uptake of this mode. The last bullet point on Page 37 seems to be a good place to reference this as it just appear to focus on quantum rather than quality
  - High-quality cycle parking should be provided at both initial (homes) and end (i.e. key trip attractors) destinations.
- Key Action 4 – any improvements to road crossing and junctions on the SRN/TLRN should be developed in consultation with TfL
- It is noted that there are references to providing new / improved wayfinding
  - Could a reference also be included that the wayfinding will reflect the cultural diversity within the borough of Brent? Comment also applicable to Key Action 11.



- Key Action 5 - Reference to more formal parking arrangements for dockless bikes operating in the borough
  - Could the strategy refer to the [Dockless Bike Share Code of Practice](#)?
- Key Action 12 – Undertake Healthy Streets Audits at stations and other key transport interchanges in the borough. We note the Council has identified as working with TfL on this objective to identify where improvements for pedestrians and cyclists are required around station and bus stops in the borough
  - Do we need to say anything re-funding of said improvements here?
  - ‘Bus stops should be clutter-free and wheelchair accessible’ – would it be worth adding something along the lines of ‘considered/perceived to be safe during all times of the day’ as well?
- Key Action 14 focuses on School Travel Plans and refers to STARS. (This programme has been updated: <https://stars.tfl.gov.uk/>)
- Key Action 18 – Extension of Santander Cycle scheme to Brent. TfL has no immediate plans to expand the cycle hire scheme to Brent. For the purposes of the Plan (spanning 2024-2029), no TfL cycle hire scheme expansion is on the cards
- This would need a substantial contribution from not just Brent, but also Hammersmith & Fulham, Ealing, Westminster and Camden
- Key Action 3 – We note that there is a proposal for a 20mph speed limit. We would like to see as much of the borough’s roads made 20mph as possible and would welcome more engagement on this as a priority

We welcome the recognition that ‘crime’ and ‘fear of crime’ within public realm are barriers to active travel. The document should go on to link directly to the Mayor’s Strategy on Violence Against Women and Girls in particular commitment 1.4. (at a very minimum within Figure 2.11)

#### **1.4 Equality and freedom for women and girls in public and online spaces**

- *MOPAC, working with TfL and other partners, will continue to implement the UN Safe City scoping report recommendations to support women and girls. This includes exploring and piloting night safety audits in town centres, transport hubs and other public spaces across London with an understanding of how these experiences may be different on the basis of individual characteristics such as disability, neuro-divergence and race.*
- *The GLA regeneration team will engage the Mayor’s Design Advocates (MDAs) in shaping public realm projects to create positive spaces that women and girls of all backgrounds, including disabled and non-disabled, are empowered to use, as is their right, without fears for their safety, through action research using live case studies. The MDAs will support the case study projects to explore how to use the design process to improve participation, design, occupation, and evaluation of spaces through this lens. This will feed into their longer-term research and design guidance in collaboration with TfL to support the design and delivery of a safe public realm.*
- *In addition, the Mayor is implementing world leading policies to improve air quality in London, including through the promotion of walking, cycling and use of public transport. For this to work for women and girls, public spaces need to be safer, and women and girls need to feel safe when using them.*

We recommend the plan links to the outcomes of the Night Safety Audits being completed within Brent by MOPAC and TfL

The plan would also benefit of linking to the public realm guidance issued by the GLA (second bullet point above), with the plan adopting the language on ‘perception of safety’ and the document’s aspirations to underpin good public realm design – *GLA Good Growth By Design: Designing Public Realm for Women, Girls and Gender Diverse*

There are several areas in the report where women’s needs are referred to as not being met yet no women specific policy or intervention to address this. We would suggest a gender inclusive objective is included or

gender is mentioned within interventions. (LB Tower Hamlets have just included some excellent examples in the recent Local Plan Consultation if this is useful to give as an example.) Consulting with women and girls on barriers to active travel should also be a key element

Lastly, the document does not mention 'night'. Considering this is a significant barrier for many, and its significant impact on active travel, it needs addressing. All schemes / designs should consider the environment at night.

### **TfL Network Performance comments:**

Key action 6 aligns with the MTS in terms of supporting sustainable modes and we support this approach. It also aligns with the Traffic Signal Timing Review outputs for TfL Network Performance which are in the form of hours saved for sustainable modes (buses / pedestrians / cyclists). If any specific schemes were brought forward they may or may not have to go through modelling assessments depending on the level of change proposed and the locations.

## Brent Cycling Campaign

From: \*\*\*\*@brentcyclists.org.uk

Date: 14/01/2024 10:24 (GMT+00:00)

To: Councillor Krupa Sheth <cllr.krupa.sheth@brent.gov.uk>

Cc: Coordinator Brent Cycling Campaign <coordinator@brentcyclists.org.uk>, [contact@activetravelengland.gov.uk](mailto:contact@activetravelengland.gov.uk)

Subject: Draft Brent Active Travel Plan 2024-29

Dear Krupa

Please find below the response on behalf of Brent Cycling Campaign to the above consultation. We have completed the online questionnaire but wish to send this detailed response in addition.

Regards  
Pareet Shah  
Chair, Brent Cycling Campaign

This is the Brent Cycling Campaign (BCC) response to the Draft Brent Active Travel Implementation Plan 2024-29 consultation. BCC is the Brent group of London Cycling Campaign (LCC).

Overall, we are in support of plan as:

1. It correctly identifies many of the benefits of active travel, both on an individual and societal level
2. It clearly identifies many of the problems caused by an excess of motor traffic.
3. It has identified the potential to significantly expand levels of active travel and shows ambition to do so, as well as reducing motor vehicle dominance in the borough. Consideration of a borough-wide 20mph speed limit, similar to other London boroughs is too be commended and would have our support.
4. It has identified the main barriers to active travel which are under direct control of Brent Council:
  - a. Poor infrastructure due to a lack of a network of protected cycle lanes and insufficiently traffic-calmed minor roads. For example, there are only 6km of protected cycle lanes in the 505km of Brent roads.
  - b. Lack of secure cycle parking
  - c. Narrow and cluttered footways.
  - d. Dangerous junctions for active travel
  - e. Illegal pavement parking, which may not be fully enforced

We have the following feedback that we are keen to see in the next draft:

1. The term 'BAME' is outdated, guidance from 2021 advised that it should no longer be used. Further information can be found here:

<https://www.ethnicity-facts-figures.service.gov.uk/style-guide/writing-about-ethnicity/>

2. Although the draft mentions walking and cycling, wheeling has been omitted and its support should be as central to the plan as walking and cycling. Better support for wheeling should include a recognition that footways must be constructed flat. (Brent's current construction style for footways gives them constant gradients and undulations at vehicle crossovers, which often constitute most of the pavement distance.)

3. The term ‘encourage’ should be replaced by ‘enable’. Anyone can encourage people to walk, wheel and cycle, but only the local authority can enable it by installing the appropriate infrastructure.
4. There is a lack of representation of in the images of disabled cyclists. Approximately 20% of the population has a disability so 1 in 5 of the images should include a disabled person cycling. Images can be found here <https://wfwimages.free.resourcespace.com/login.php>
5. We fully appreciate the financial constraints that the council is operating under. We would recommend that parking revenue is also included as a funding source towards active travel. We have the following parking policy recommendations:
  - a. Introduction of residents parking permits throughout the borough.  
Currently it is very fragmented.
  - b. Evidence shows that introduction of residents parking schemes reduces overall car ownership and car use where implemented, thus meeting Brent’s policy goals.
  - c. As well as emissions, parking charges should also factor in vehicle size/mass as these are major factors in road danger and road wear.
6. We question the aim to focus new school streets on new schools. It would be better to use a data-led approach and address those schools with poor air quality and a history of collisions.
7. The harmful effects of noise pollution are becoming better understood and we would recommend its inclusion along with air pollution.
8. We would like to see the publication of regular updates on progress towards the targets, eg 6 monthly or annually.
9. Some of the barriers mentioned, such as lack of fitness or time, indicate a perception of cycling as a leisure activity, rather than a transport mode, and this should be tackled by Brent. Similarly having a disability is not a barrier to cycling – a lack of appropriate, inclusive infrastructure is the barrier.
10. Walking and wheeling are hindered by the installation of cycle hangars and EV chargers on the already narrow footways. These should not be on the footway and instead space reallocated from other places such as the on-road parking spaces repurposed for such infrastructure.
11. We request that the plan refers to the latest TfL Transport in London report and other sources like Lime’s report on women cycling safety for its data.

## Sudbury Court Residents Association

Subject: Draft Brent Active Travel Plan 2024-29

Date: Sun, 14 Jan 2024 23:48:26 +0000

From: \*\*\*\*\*@the-scra.co.uk

To: Martin, Tim <\*\*\*\*\*@brent.gov.uk>

CC: 'Secretary SCRA' <secretary@the-scra.co.uk>

Dear Tim

My name is Pareet Shah and I am chair of the Sudbury Court Residents Association, representing approximately 3000 households.

I am writing regarding the above consultation.

I have already responded using the online questionnaire in support of the plan, but forgot to add a few points, so would like to add the following comments:

- Many residents have contacted us about the design of the new footways when they are replacing the old ones. The are now undulating where a driveway crossover is located and the gradient is making walking difficult for many, especially with limited mobility. It also hindering those using wheelchairs. We request that future footways are flat to facilitate comfortable walking and wheeling.
- Several residents have noticed EV charging cables trailed across the pavements, creating an obstruction for some and a trip hazard. Please can the council ban this and ensure this is enforced.

We hope that you take our comments into consideration.

Regards

Pareet Shah





## EQUALITY ANALYSIS (EA)

<b>POLICY/PROPOSAL:</b>	<b>Brent Active Travel Implementation Plan 2024-2029: Final Version</b>
<b>DEPARTMENT:</b>	<b>Planning and Development Service</b>
<b>TEAM:</b>	<b>Transportation Planning</b>
<b>LEAD OFFICER:</b>	<b>Tim Martin – Transportation Planning Manager</b>
<b>DATE:</b>	<b>06.03.24</b>

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

### SECTION A – INITIAL SCREENING

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

The Brent Active Travel Implementation Plan 2024 – 2029 (ATIP) outlines the measures and interventions that the Council and its partners are proposing to deliver over the next five years with the overarching aim of improving conditions for active travel in the borough and to enable more people to walk, wheel or cycle. The plan sits alongside the Brent Long Term Transport Strategy (LTTTS) and supersedes the Brent Cycling Strategy 2016 and the Brent Walking Strategy 2017.

The plan responds to the challenges that many of our residents have told us they face by seeking to make active travel a meaningful and crucial element of people’s daily journeys. It aims to address the barriers to active travel by making our streets safer and more inclusive for walking, wheeling and cycling; improving the quality and visibility of our pedestrian and cycle infrastructure; and equipping our communities with the confidence and means to walk, wheel and cycle. This, in turn, will enable us to create more sustainable, healthier and better-connected places where people aspire to live and work.

To address the challenges we face and to create the step change the borough and our communities need requires us to deliver a range of ambitious actions laid out in the ATIP. This includes striving to reduce car dominance and putting the needs of pedestrians and cyclists first; implementing walking, wheeling and cycling infrastructure that is fit for purpose and accessible to all; and providing our residents with access to appropriate support, training and equipment. The Council will lead, but successful delivery will only be achieved by everyone playing their part – individual residents, community groups, businesses and a range of public and private organisations. The availability of funding will also be pivotal in the delivery of the plan.

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

The ATIP and the various proposed interventions/actions within it will affect all Brent residents, businesses and those people who work, study, visit or just pass through the borough. However, the impacts will vary from one group of people to another, just as current

active travel conditions and the way people travel affect different groups in different ways. The extent of the impact on different groups will also be influenced by the approach and interventions proposed.

### **Plan vision and priorities**

The overarching vision set out in the ATIP is:

*‘To create an environment and culture in which walking, wheeling and cycling are safe, convenient, healthy and attractive options for everyone in Brent.’*

The plan identifies three core priorities which are fundamental for delivering this vision:

#### 1. Make our streets safer and more inclusive for walking, wheeling and cycling

Research shows people are often deterred from walking, wheeling and cycling by too much traffic and traffic travelling too fast, as well as by safety and personal security concerns, having a disability and a view that streets need to be more pedestrian and cycle friendly. With a focus on all aspects of planning and decision-making, our aim is to ensure our streets and places are better designed, with less and slower traffic and greater priority given to people walking, wheeling and cycling to overcome these barriers.

#### 2. Improve the quality and visibility of our pedestrian and cycle infrastructure

As well as improving street environments for pedestrians and cyclists, providing high-quality and more visible walking, wheeling and cycling infrastructure will also be vital to enabling more people to travel by active modes of transport. Our aim is to implement a clearly defined, joined-up network of active travel routes and rolling out other infrastructure improvements that will make walking, wheeling and cycling in Brent safe, convenient and attractive options for more people.

#### 3. Equip our communities with the confidence and means to walk, wheel and cycle

Appealing pedestrian and cycling environments and high-quality infrastructure are required to encourage more people to walk, wheel and cycle. However, giving people the confidence and motivation to walk and wheel and skills and means to cycle are equally important. To complement the planned physical improvements, we propose to put in place a comprehensive programme of support, advice, training and community events; and ensure that people have access to appropriate equipment for cycling, with the aim of raising the profile of and removing the socio-economic barriers to active travel.

### **Plan measures/interventions**

At a broad level, it is anticipated that different types of interventions and actions will impact on different groups in different ways. These are summarised below. Further details of some of the more specific impacts on particular groups are set out in Section B(2).

- Measures aimed at making our streets safer and more inclusive for walking, wheeling and cycling will benefit all groups, but particularly the very young and the elderly, those with disabilities, women and certain ethnic minority groups. In particular, interventions aimed at reducing car dominance and putting the needs of pedestrians and cyclists first will particularly benefit the young and certain ethnic minority groups who are involved in a disproportionate number of road collisions. The same measures will also benefit the very young and the very old and certain ethnic minority groups who are particularly susceptible to the negative effects of, or are more likely to face exposure to, poor air quality.

Measures aimed at enhancing personal safety/security will particularly benefit the elderly and women.

- Measures aimed at improving the quality and visibility of our pedestrian and cycle infrastructure will benefit all groups, but particularly the very young and the elderly, those with disabilities, women and certain ethnic minority groups. Measures aimed at addressing issues of severance will be of particular benefit to the very young, the elderly and disabled groups. Measures aimed at enhancing walking, wheeling and cycling links to and between our major town centres and growth areas from outside and within the borough – as well as our local health, education, employment and shopping and leisure facilities will benefit all groups, but particularly the very young, the elderly and disabled groups.
- With high levels of deprivation and problems with obesity prevalent across the borough, providing our residents with access to appropriate support, training and equipment will benefit all groups, but will particularly benefit the very young and certain ethnic minority groups.

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.

The Equality Act 2010 covers the exercise of public functions, employment and work, goods and services, premises, associations, transport and education, all of which are either directly or indirectly impacted upon by the way we all are able to travel to and from any destination or place. Travel and transport is an essential and unavoidable element of everyone's daily life regardless of whether they travel independently, as a passenger or for example as someone awaiting provision of a service in their home or a delivery.

The Council is required by the Public Sector Equality Duty to have due regard to the need to address inequalities and a number of aspects are particularly relevant to the ATIP. These include a requirement to:

- eliminate discrimination;
- 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.

At the broadest level, active travel is an important facilitator of social inclusion which can affect economic and social outcomes, and therefore inequality. Where people have easy and affordable access to walking, wheeling and cycling, it can provide access to different opportunities and help promote equality. In particular:

- Active travel can be integral to improving social equality, by increasing access to jobs, education and services. Policies that make walking, wheeling and cycling more accessible (such as by putting the needs of pedestrians and cyclists first and implementing walking, wheeling and cycling infrastructure that is fit for purpose and accessible to all) can be an effective way to help people who are unable to access or afford a private car or public transport to access and maintain work. Help with cycle equipment costs also has a key role to play in schemes to promote employment. However, careful consideration is needed to ensure these help those most in need.
- Active travel policy cannot work in isolation and can have most benefit in reducing social inequality as part of wider initiatives, often at a local or place-based level, including on skills, education, employment policy, land use planning and housing.

The ATIP aims to address and improve and advance conditions and opportunities for people living and working in or visiting Brent by removing or minimising disadvantages, taking steps to meet the needs and encouraging participation in public life, particularly among those where this participation is at present disproportionately low. For example, a person with a disability such as visual impairment may particularly benefit from improved pedestrian crossing facilities at junctions or the removal of street clutter from pavements. Similarly, children, the elderly and women will likely benefit from measures that result in a safer, more secure streets and places, especially when travelling alone or at night.

That said, it is clear that not all of the proposed measures contained within the ATIP will benefit all groups equally, particularly where they are targeted at addressing a specific issue or a problem that affects a particular group. For example, measures designed to reduce car dominance such as through the introduction of school streets schemes or removal of on-street parking, may form an obstacle to certain groups, such as the elderly or disabled, particularly if they do not have the opportunity or ability to travel by means other than car. Such issues would need to be carefully considered when designing, consulting and building such schemes, with appropriate mitigation taken where specific concerns cannot be fully addressed.

For the most part, the various priorities, measures and actions outlined in the ATIP seek to address a wide range of often interconnecting issues, whilst looking to enhance the walking, wheeling and cycling experience for those living and working in, or visiting, Brent. On balance it is anticipated that the benefits these improvements will bring, including those to protected characteristics, will significantly outweigh the disbenefits. Central to achieving this will be the need to continue engaging closely with local communities, our partners and a wide range of stakeholders.

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

Characteristic	Impact Positive	Impact Neutral/None	Impact Negative
Age	X		X
Sex	X		X
Race	X		X
Disability *	X		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”.



	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.

Brent currently experiences a range of transport and related problems, many of which are interlinked. These include long-standing issues around congestion, poor air quality and road safety - which continue to blight some of our most vulnerable communities. In addition, there is a pressing need to secure a healthier, more sustainable and more inclusive future for all those who live, work or visit the borough.

Further details of some of the main challenges, and the opportunities to address them, are set out below. The various challenges have, in part, helped inform the ATIP priorities and proposed interventions/actions.

### **Air Quality**

- Road transport is the main source of nitrogen dioxide (NO<sub>x</sub>) and a significant contributor to particulate matter (PMs) in Brent, two of the most dangerous pollutants which contribute to the premature death of nearly 10,000 people a year in London. Motor vehicles are currently responsible for around half of NO<sub>x</sub> emissions and one-third of PM<sub>10</sub> emissions in the borough.
- The Council has a legal duty to reduce pollution and is committed to meeting World Health Organisation (WHO) targets on air quality by 2030. Large parts of the borough are currently designated as an Air Quality Management Area (AQMA) and Air Quality Focus Areas (AQFAs).
- Air quality has a particularly detrimental impact on children, affecting lung development which makes them more susceptible to infection and disease as they grow. They are also more vulnerable to polluted air than adults. Older people who may be more susceptible due to existing illnesses, and pregnant women, are also more vulnerable. People are also twice as likely to be affected by pollution in areas of higher deprivation as these areas have poorer air quality.
- Reducing motor vehicle dominance and facilitating the uptake of walking, wheeling and cycling provide significant opportunities to improve air quality in parts of the borough and will benefit the health of everyone who lives and works in or visits Brent.

## Health and Wellbeing

- Poor health and high levels of inactivity are two of the major challenges facing a large number of Brent's residents. The borough is ranked as the fourth most deprived local authority in London and in 2016 it was named as the fattest London borough. Currently, around 55% of Brent's adult population (aged 18+) are classified as overweight or obese, whilst almost one in three children are classed as obese by the time they leave primary school – way above the London and England average. Brent is also the 4th most inactive borough in London, with around 3 out of every 10 people in the borough currently doing less than 30 minutes of activity a week.
- Providing safe and secure infrastructure to encourage walking, wheeling and cycling, especially for shorter journeys, represents one of the best ways of addressing challenges around poor health and inactivity. However, the fragmented nature of many of the borough's walking, wheeling and cycling routes often prevents better utilisation of these assets, with a lack of connectivity and route severance cited as problems by users. Other issues often acting as a deterrent to more active travel include high traffic volumes; parking on footways and in cycle lanes; fear of crime/collisions; and poorly maintained and cluttered footways.
- A key opportunity that could benefit the borough's residents is TfL's plan for a London-wide strategic cycle network which, when completed, will place 70% of Londoners within 400 metres of new, high quality, safe cycle routes. Among the schemes currently being developed include a range of 'Healthy Streets' corridor improvements between Wembley and Willesden Junction, which will significantly improve conditions for pedestrians and cyclists in the area. Another opportunity includes the potential for securing the extension of the Mayor of London's and/or other Cycle Hire Schemes to the borough, however, such schemes can be expensive and possibly unaffordable to those on very low incomes.

## Road Safety

- Reducing casualties is at the heart of the Council's approach to road safety, and the number of people killed or seriously injured on Brent's roads continues on a downward trend. However, it is clear that more still needs to be done.
- The Brent Road Safety Action Plan published in 2021 highlights that vulnerable road users, such as pedestrians, cyclists and powered two-wheelers, are the most likely user group to be killed or seriously injured, with a high proportion of serious and fatal collisions occurring at night and at road crossings/junctions. The study concludes that a focus on road safety interventions that aims to reduce these identified 'high risk' collision types will likely result in the greatest progress towards achieving Vision Zero in Brent, but suggests the need for a particular emphasis on tackling road speed; education and behaviour change; and protecting vulnerable road users – a key focus of the ATIP.

## Climate Change

- In 2019 the Council declared a climate and ecological emergency, stating the need to try and achieve carbon neutrality by 2030. A key priority is to bring about as close as possible to zero the number of petrol and diesel road journeys made in the borough; and to increase significantly journeys made by sustainable modes of travel, such as cycling, walking or public transport.
- It is clear that achieving net zero carbon emissions from road transport in Brent will have significant environmental and health benefits for everyone living, working or visiting the borough. However, it will also require enormous changes in the way that people travel in Brent, in vehicle technology, in the fuel sources that power transport and uptake in the technology that will make travel more efficient or not needed at all.

- Amongst the range of measures proposed in the ATIP include reducing motor vehicle dominance and reallocating road space to walking, wheeling and cycling. Whilst these are all considered essential measures if we are to achieve our overarching targets, some of these are likely to have implications for groups such as the elderly or disabled, particularly if they do not have the opportunity or ability to travel by means other than car.

### **Congestion**

- Whilst road traffic volumes in Brent have decreased slightly in recent years with the number of vehicle kilometers travelled on the borough road network falling from a high of 1.008 billion in 2016 to 962 million in 2022, parts of the road network in Brent have frequent congestion problems (e.g. A406, A5), whilst journey time reliability for buses on a number of key corridors within the borough remains poor, especially during peak hours. These problems are exacerbated by high levels of car dependency in parts of the borough; a large increase in the amount of lorry and van traffic on the borough road network; and illegal/inconsiderate on-street parking and loading and lack of adequate enforcement in parts of the borough.
- Despite this, there is significant potential to reduce trips by car and increase trips by active modes. For example, half of all car journeys in Brent are less than 5km and could be easily walked, wheeled or cycled. However, there is a need to overcome range of barriers including low levels of cycle ownership; physical severance by major road/rail arteries (e.g. A406); and cultural challenges within certain ethnic minority groups. Addressing such barriers would particularly benefit people of all ages, disabled groups, and certain ethnic minority groups.

### **Connectivity/Accessibility**

- The borough's active travel network is very fragmented, whilst severance caused by major infrastructure, such as the A406, waterways and several railway lines are often cited as a barrier to people wanting to walk, wheel or cycle more. Proposals for the delivery of a London-wide strategic cycle network would greatly benefit borough residents, particularly those more isolated groups, such as the elderly and disabled.
- Crowded and obstructed streets, narrow footways and cycle lanes, and damaged or poorly maintained roads and pavements are among the most common complaints cited by people walking and cycling. Such issues are often magnified when experienced by those with disabilities. Measures to improve the accessibility and inclusiveness of our streets for those walking, wheeling and cycling, such as through reviewing arrangements around pavement parking; removing sources of pavement clutter and footway obstructions; and implementing timely carriageway and footway repairs and resurfacing, will benefit people of all ages and disabled groups.

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

### **AGE**

<b>Details of impacts identified</b>	With around 55% of the adult population in Brent classified as overweight or obese, and with almost one in three children in the borough classed as obese by the time they leave primary school, measures to promote healthy, active travel will positively benefit young and old.
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	<p>Measures to reduce traffic and facilitate an increase in walking, wheeling and cycling will bring significant improvements to air quality, which will be particularly beneficial to children and those with underlying health issues, including older people. In particular, children driven to primary school are exposed to higher levels of harmful particulates and NOx pollution inside vehicles, so measure to promote walking, wheeling and cycling to school will be beneficial to this group.</p> <p>Measures to improve safety and security on our streets, including at night, are expected to be beneficial for younger people. Similarly, a reduction in crime and anti-social behaviour is also expected to be particularly beneficial to older people who may be otherwise deterred by this.</p> <p>A key element of the ATIP is to reduce the use of private cars and re-purpose the kerbside to provide for other uses, such as cycle parking. As older people are more likely to be car owners there may be a slight negative impact on this group. However, this is expected to be outweighed by broad health and accessibility benefits delivered by the plan, including improved access to better quality pedestrian and cycle infrastructure and enhancements to the wider public realm (e.g. the reduction in street clutter).</p>
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## **DISABILITY**

<p><b>Details of impacts identified</b></p>	<p>Improving physical accessibility and removing barriers to people with disabilities is a key theme of the ATIP. There is often a significant journey time 'penalty' at present for those with disabilities. This is considered likely to be a deterrent to travel with the resulting impact of a narrowing of opportunity for economic and social activity with potential consequences for physical and mental well-being. Key priorities within the plan include delivering public realm improvements to provide safe, welcoming and legible street environments for people with disabilities. Similarly, increased priority for pedestrians, including extended crossing time, will also benefit people who may need more time to cross the road comfortably.</p> <p>The plan also proposes targeted services and campaigns to increase participation in sustainable travel by people with disabilities, including inclusive cycling initiatives. This is a particular priority as disabled people may suffer from higher mortality rates than the general population, potentially reflecting exclusion from active travel / lifestyles. The renewed focus on engagement identified in the plan are also expected to lead to a better representation of people with disabilities in the decision making process.</p>
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## **RACE**

<b>Details of impacts identified</b>	<p>Brent is the second most ethnically diverse borough in London - 64% of the local population is from Black, Asian and other minority groups and over 149 different languages are spoken. However, certain ethnic minority groups are typically over-represented in indices of deprivation and more likely to be exposed to transport related harmful impacts, such as traffic collisions and poor air quality and health inequalities related to inactive lifestyles.</p> <p>Measures in the ATIP aimed at improving road safety, reducing traffic congestion and promoting active travel will provide significant benefits to all groups, although more targeted educational and training initiatives to promote active travel among certain under-represented groups, including certain ethnic minority groups, and to ensure that such groups are better represented in the decision making process more generally, may be required.</p>
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## SEX

<b>Details of impacts identified</b>	<p>Women and girls are often less likely to walk, wheel and cycle than their male counterparts, with concerns over confidence, road safety, lack of adequate facilities and personal security often cited as key reasons for this. The provision of accessible, well connected and safe/secure walking, wheeling and cycle routes, along with road safety education/cycle training will benefit all groups, but particularly women.</p> <p>Safety and security on our streets is also a concern for women who often feel vulnerable to attack. In this regard, improved public realm and lighting are likely to have a positive impact on safety and perceived safety and will figure prominently in transport improvement schemes. The Council is also committed to undertaking women's safety audits when developing future transport and public realm improvement schemes in the borough.</p>
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## SEXUAL ORIENTATION

<b>Details of impacts identified</b>	<p>Similar to women and people who are going or have gone through gender reassignment, members of the LGBT community often find personal safety and security to be a concern – particularly when travelling alone or at night. By working closely with TfL, the police and local communities, we aim to reduce crime and anti-social behaviour on our streets, benefiting all groups, but particularly those who may be more vulnerable to this risk.</p>
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## PREGANCY AND MATERNITY

<b>Details of impacts identified</b>	<p>Improving physical access to the public realm is expected to have a positive impact for this group as it will improve accessibility and create more welcoming places. Improvements to air quality are also expected to have a positive impact, particularly in relation to the</p>
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	<p>health of unborn children for whom exposure to poor air quality has been identified as a particular issue. The implementation of more ‘people friendly’ street environments through programmes such as Healthy Neighbourhoods are expected to have a positive impact for this group.</p>
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### **RELIGION OR BELIEF**

<p><b>Details of impacts identified</b></p>	<p>Mesures to improve personal safety/security on our streets will likely benefit different faith groups in much the same way as other target groups.</p>
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### **GENDER REASSIGNMENT**

<p><b>Details of impacts identified</b></p>	<p>Similar to women and those from different religious groups or the LGBT community, people who are going or have gone through gender reassignment, often find personal safety and security to be a concern. By working closely with TfL, the police and local communities, we aim to reduce crime and anti-social behaviour on our streets, benefiting all groups, but particularly those who may be more vulnerable to this risk.</p>
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### **MARRIAGE & CIVIL PARTNERSHIP**

<p><b>Details of impacts identified</b></p>	<p>There is no evidence to suggest that people from this protected characteristic will be disproportionately affected (either positively or negatively).</p>
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<p>3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?</p>
<p>No.</p>

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

<p>The ATIP has been informed by extensive and ongoing engagement with Brent’s diverse communities, as well as wider feedback received as part of a number of Council consultations – including on the Borough Plan, the Brent Long Term Transport Strategy and the Brent Active Travel Programme. This has helped ensure that it reflects the genuine needs and desires of those who live and work in the borough and will contribute to bringing about real and lasting change.</p> <p>An eight-week period of public consultation and wider stakeholder engagement was undertaken on a draft version of the ATIP between 20 November 2023 and 14 January</p>
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2024, with the aim of ascertaining what people thought of the plan and to hear what they considered to be the key issues and priorities going forward.

Over 650 people, from a wide range of locations, backgrounds and different age groups responded to an online survey or took part in a series of community engagement sessions, sharing their views and providing valuable feedback. Several stakeholder organisations – including TfL and the Brent Cycling Campaign also responded to the consultation. All comments and suggestions received from the various consultation and engagement exercises have been considered carefully and some minor changes to the plan have been made as a result. These include acknowledging those issues and priorities that are most important to our residents; and changing the emphasis of, or providing further clarity on, some of our proposals and projects.

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

The measures, interventions and actions contained within the ATIP have to be seen in the wider context of policies and strategies. Each objective can only be acted upon and implemented through a series of individual schemes. Designs will take into account needs for all users, this includes formal safety audits and assessment against the checklist for measures provided by the Royal National Institute for the Blind (RNIB).

All schemes set in the public highway will be consulted on. Should there be any aspects of individual schemes that have potential to disproportionately or negatively impact on individuals or group of protected characteristic then they can be addressed through the public consultation stage of the scheme.

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

It is anticipated that through ongoing engagement with a range of groups/stakeholders and adherence to relevant guidance/standards, at all stages of project/scheme development, will ensure any negative impacts are removed, or mitigated.

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

Monitoring of the delivery of the ATIP will be undertaken by the Transportation Planning Team, with regular meetings to be held with those responsible for the delivery of the various projects and initiatives outlined in the delivery programme, with progress towards the various targets and indicators reported each year.

A mechanism for monitoring and evaluating the impact of specific schemes and initiatives in delivering the various plan priorities will be established. This will include details of monitoring data that will be required to be collected before, during and after scheme implementation.

## 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 ATIP sets out the vision to make active travel the natural first choice for everyday journeys and describes how we will increase walking, wheeling and cycling across Brent. However, the plan does not sit in isolation, but is closely aligned with a wide range of National, Mayoral and borough plans and strategies. These include the Cycling and Walking Plan for England, the Mayor of London’s Transport Strategy (MTS); the Borough Plan; the Brent Climate and Ecological Emergency Strategy; the Joint Health and Wellbeing Strategy; and the Brent Local Plan. Accordingly, many of the interventions and actions contained within the plan are designed to meet multiple priorities and objectives, some of which will have varying degrees of impact – both positive and negative - on our diverse communities.

Following assessment, it is considered that, on balance, the significant benefits that the interventions and actions within the ATIP will bring, including those to protected characteristics, will significantly outweigh the disbenefits to these groups. However, where negative impacts have been identified, it is anticipated that these can be addressed, or mitigated, as projects and schemes are further developed. A requirement to engage closely with local communities, our partners and a wide range of stakeholders at all stages of project development will ensure this.

On this basis, it is recommended that the approach contained within the Brent Active Travel Implementation Plan 2024-2029 for improving conditions for active travel in the borough and to enable more people to walk, wheel or cycle is adopted, but is kept under regular review.

## SECTION D – RESULT

*Please select one of the following options. Mark with an “X”.*

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

## SECTION E - ACTION PLAN

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

<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>
Improve involvement and consultation with different equality groups	More regular dialogue/engagement (including through groups such as the Active Forum) will help ensure key issues/concerns are taken on board when developing/ implementing transport schemes.	Transport Planning/ Healthy Streets & Parking	Ongoing
Monitor, evaluate and review Equality Analysis annually	Ongoing monitoring and regular review in partnership with stakeholders/user groups will help ensure relevant issues are being addressed and determine the effectiveness of policies/measures.	Transport Planning	April 2025


## **SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Tim Martin – Transportation Planning Manager
<b>REVIEWING OFFICER:</b>	Ciara Whelehan – Spatial Planning Manager
<b>HEAD OF SERVICE:</b>	Post currently vacant
<b>OPERATIONAL DIRECTOR:</b>	Gerry Ansell – Director of Inclusive Regeneration and Employment

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 <p><b>Brent</b></p>	<p><b>Cabinet</b> 28 May 2024</p>
	<p><b>Report from the Corporate Director of Neighbourhoods and Regeneration</b></p>
	<p><b>Lead Member – Cabinet Member for Regeneration &amp; Planning (Councillor Shama Tatler)</b></p>
<p><b>Draft Staples Corner Growth Area Masterplan and Design Code Supplementary Planning Document</b></p>	

<b>Wards Affected:</b>	Dollis Hill
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>No. of Appendices:</b>	<p>Two: Appendix 1: Weblink to Draft SPD: <a href="https://acrobat.adobe.com/id/urn:aaid:sc:VA6C2:35bc35a6-c93c-4e8e-bc16-0c9f63c75b07">https://acrobat.adobe.com/id/urn:aaid:sc:VA6C2:35bc35a6-c93c-4e8e-bc16-0c9f63c75b07</a></p> <p>Appendix 2 Equality Analysis</p>
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	<p>Gerry Ansell, Director Inclusive Director of Regeneration and Employment 020 8937 6477 <a href="mailto:Gerry.Ansell@brent.gov.uk">Gerry.Ansell@brent.gov.uk</a></p> <p>Jonathan Kay, Head of Regeneration 020 8937 2348 <a href="mailto:Jonathan.Kay@brent.gov.uk">Jonathan.Kay@brent.gov.uk</a></p> <p>Paul Lewin, Spatial Planning Manager 020 8937 6710 <a href="mailto:Paul.Lewin@brent.gov.uk">Paul.Lewin@brent.gov.uk</a></p> <p>Kiran Chauhan, Regeneration Project Manager 07436 704314 <a href="mailto:Kiran.Chauhan@brent.gov.uk">Kiran.Chauhan@brent.gov.uk</a></p>

## **1.0 Executive Summary**

- 1.1 To present to Cabinet the draft Staples Corner Growth Area Masterplan and Design Code Supplementary Planning Document (SCGA Masterplan SPD) for approval for publication and statutory consultation.

## **2.0 Recommendation**

- 2.1 That Cabinet note the contents of this report.
- 2.2 That Cabinet approve the draft SCGA Masterplan SPD for publication and statutory consultation.

## **3.0 Detail**

### **3.1 Cabinet Member Foreword**

- 3.1.1 The Staples Corner Masterplan delivers on our Local Plan commitment for regeneration and growth and sets an ambitious vision to create a higher quality and intensified industrial area sitting adjacent to a new urban community. Regeneration and growth will support a rich ecology of industrial and co-located residential uses to create an exemplary 15-minute city where people live, work and interact. Intensification will deliver a new and varied supply of modern industrial premises for London's strategic and local business needs, as well as commercial space, social infrastructure and an improved public realm to support a new mixed use residential community.
- 3.1.2 This Masterplan SPD sets the framework to facilitate the delivery of high-quality homes, attract investment for more business opportunities and jobs, all supported by new infrastructure and community facilities. Business growth will strengthen the area's existing economy and provide space for emerging sectors, including logistics, light industrial units and workspaces. By 2041, Staples Corner will deliver at least 2,200 new homes co-located alongside new and refurbished industrial premises in a way that supports the transition to a net zero carbon circular economy and the challenges of climate change.
- 3.1.3 Brent Cross West station has improved Staples Corner public transport connectivity into central London and beyond. Planned West London Orbital services will further improve connections and cut journey times around West London, providing future residents and workers greater choice and convenience. Statutory consultation is another opportunity for residents, businesses and communities and partners to have their say on what the future will hold for their local area; and we encourage all stakeholders to engage with the consultation and share their views.
- 3.1.4 The SCGA Masterplan SPD addresses the following Borough Plan Priorities.
- Strategic Priority 1 - Prosperity and Stability in Brent. Through the preparation of a SCGA Masterplan SPD, the Council will provide a

framework to support the business community to grow, ensure the provision of secure local well-paid jobs and delivering accessible and genuinely affordable housing.

- Strategic Priority 2 - A Cleaner, Greener Future. The draft SCGA Masterplan SPD seeks to ensure sustainability is central to the growth of our borough and local economy. This is further discussed in Section 8.0.
- Strategic Priority 3 – Thriving Communities. The preparation of the draft SCGA Masterplan SPD is informed by engagement with stakeholders, local residents and communities, businesses and landowners. There will be further engagement at statutory consultation stage (Summer 2024).

## **3.2 Background**

3.2.1 Brent's Local Plan (2019-2041) was adopted in February 2022. The Plan sets out the vision and policies for development in the borough for the next 10 years, which includes the delivery of 23,250 new homes from 2019/20 to 2028/29. Key to accommodating an increasing population are eight growth areas, viewed as the most sustainable spatial expression for growth, exploiting brownfield land, good access to public transport and higher densities to deliver the majority of new homes alongside regeneration benefits and infrastructure.

3.2.2 The Staples Corner Growth Area (SCGA) extends to 43 hectares of brownfield land that accommodates light industrial, heavier industrial and distribution uses, plus other uses such as wholesale and trade counter in a mixture of old and more modern premises of varying heights and quality. It is bounded on the north by the Welsh Harp / Brent Reservoir and Neasden Recreation Ground open spaces. To the east is the A5 Edgware Road, beyond that warehousing and the Brent Cross Opportunity Area in London Borough of Barnet. Brent Cross West station recently opened which has improved the transport connectivity of Staples Corner. The Local Plan allocates Staples Corner as a "Growth Area - Strategic Industrial Location subject to co-location and intensification". The plan states that in addition to around 2,200 homes, the area will through industrial intensification together with co-location of residential and industrial uses provide a major boost to business and employment opportunities through increased floorspace. Staples Corner has the potential to deliver a new varied supply of modern industrial premises, studios and managed workspaces to meet London's strategic and local business needs, as well as new commercial space and social infrastructure to support a mixed use residential community.

3.2.3 The SCGA Masterplan SPD is a long-term, ambitious and comprehensive plan that will help to secure at least 2,200 new homes, as well as new infrastructure to help maximise opportunities and wellbeing for local residents, businesses and communities.

### **Draft Staples Corner Growth Area Masterplan SPD**

3.2.4 Since Summer 2022 officers have worked with consultants to develop the draft SCGA Masterplan SPD. This has included extensive engagement with a range

of partners and stakeholders including residents and businesses, community organisations, landowners, developers, as well as local councillors, the Greater London Authority (GLA), Transport for London (TfL), National Highways (NH) and Barnet Council.

- 3.2.5 As outlined in the Local Plan, the SCGA Masterplan SPD is required to set out the vision for how the area will better work in the future, 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. The draft Masterplan SPD document sets out a robust urban design framework comprising development, placemaking and environmental and sustainability principles. The draft Masterplan SPD also incorporates a Design Code to provide guidance on the council's expectations for high quality design and placeshaping within and around the Staples Corner Growth Area. The draft design code has already been the subject of statutory consultation which took place from 24<sup>th</sup> August to 2<sup>nd</sup> November 2023. 39 responses from organisations/individuals were received which officers are currently considering. 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 and work, while also adhering to the highest environmental standards required to support climate change, resilience and transition to net zero carbon. Precedent imagery will be added to Design Code Chapters 6, 7 & 8 prior to publication and statutory consultation.
- 3.2.6 The SCGA Masterplan SPD has tested a number of options to deliver growth, including one option for 3,066 homes, which is above the indicative 2,200 homes figure in the Local Plan. The SCGA Masterplan SPD also provides detailed guidance regarding the planning process for new development schemes, and best practice illustrations. To ensure the SPD remains relevant over the Local Plan period, the Council will be expected to review the document every 5 years.
- 3.2.7 To advance the draft SCGA Masterplan SPD towards adoption, statutory public consultation of not less than 4 weeks is required, however consistent with the approach the Council has taken with other SPDs, it is recommended that the draft SCGA Masterplan SPD be made available for public consultation for a period of 6 weeks. Subject to consideration of all consultation representations and any necessary amendments, the final SCGA Masterplan SPD would then be returned to Cabinet for adoption and publication.
- 3.2.8 Regeneration and Spatial Planning teams have developed the draft SCGA Masterplan SPD in-house, building on the Masterplanning work developed by appointed consultants 5<sup>th</sup> Studio, RCKa, PRD, Alan Baxter Associates, Colliers, Steer and Secchi Smith. Steer Consultants are preparing the Staples Corner Transport Study which is in draft and expected to be finalised prior to recommended adoption of the SCGA Masterplan SPD.

#### **4.0 Stakeholder and ward member consultation and engagement**

- 4.1 The Cabinet Member for Regeneration & Planning has been regularly briefed on the development of the draft SCGA Masterplan SPD.
- 4.2 Ward councillors from Dollis Hill were briefed March 2023 and January 2024 on public engagement and the development of the draft SCGA Masterplan SPD. Discussions on the development of the SCGA Masterplan SPD took place with the Local Plan Member Working Group February 2023 and February 2024. Further engagement and consultation has taken place recently with members. The draft Masterplan was presented at Brent's Quality Review Panel January 2024. London Assembly Member Hirani was briefed January 2024.
- 4.3 Statutory public consultation (Summer 2024) provides further opportunities for engagement with stakeholders, landowners, local residents, businesses and communities, and statutory partners. This will entail the holding of drop in events both in person and online, contacting key stakeholders and statutory consultees including landowners and setting up an online page for receiving representations. The statutory consultation period will be publicised on social media.

## **5.0 Financial Considerations**

- 5.1 Costs to produce the SCGA Masterplan SPD are being met through existing Neighbourhoods and Regeneration budgets and earmarked reserves.
- 5.2 There are no spending commitments entered into as a result of the approval of this document. However, Cabinet should be made aware of the following implications of new development, which are summarised below at a high level (with assumptions) and which will require further detailed analysis in the future.
- 5.3 The draft Masterplan SPD identifies the capacity to deliver between 2,935 and 3,066 additional homes. The increase in the council tax base could generate between £1.1m and £2.2m of additional council tax income per year at today's rates, depending on the details of development.
- 5.4 The draft Masterplan SPD also suggests an increase in commercial floor space of up to 120,381m<sup>2</sup>, which could result in additional business rates income when compared to the existing amount of commercial property in the area.
- 5.5 New developments will bring increased costs for the council through the need for additional refuse collections, greater demand for social services, and higher pressure on existing community resources. Some of the new refuse collection costs could be covered by the existing contracts threshold for growth. A detailed analysis would need to be carried out to estimate the full extent of all the additional costs.
- 5.6 The impact on community resources could be mitigated through the collection of additional Community Infrastructure Levy (CIL) payments from developers. For example, the addition of 3,066 new homes could net up to £25.7m in CIL contributions. A more detailed estimate will not be possible until planning applications are submitted.



5.7 The report gives high-level consideration to potential funding streams that could aid delivery, and these will need to be maximised upon implementation. Examples include Government / GLA grant funding (e.g. the New Homes Bonus or similar future affordable housing incentives) and local funding in terms of Section 106 planning agreements.

## **6.0 Legal Considerations**

6.1 Town and Country Planning (Local Planning) (England) Regulations 2012 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.

6.2 A Strategic Environmental Assessment (SEA) Screening Statement will form part of the consultation material. This has concluded that a SEA is not required due to the Masterplan SPD supplementing policies covering the area, which have already benefitted from consideration in the Brent Local Plan SEA.

## **7.0 Equality, Diversity & Inclusion (EDI) Considerations**

7.1 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.

7.2 Equalities Analysis has been undertaken and is at Appendix 2. The SCGA Masterplan SPD aims to deliver new jobs, homes and infrastructure, and in doing so 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. By facilitating these objectives, the final SCGA Masterplan SPD has the potential to benefit the businesses, residents and diverse communities in Staples Corner and surrounding areas.

7.3 The final SCGA Masterplan SPD has the potential to have positive impacts on existing and new communities, including groups with protected characteristics, as it will identify a range of placemaking, environment and sustainability principles which should apply to and guide comprehensive redevelopment of the area. There may also be specific positive impacts on groups with protected

characteristics. Improvements to the public realm and redevelopment are likely to benefit all groups, particularly people of different age groups and those with disabilities. Provision of accessible and affordable housing will also benefit disabled people and those from socio-economically disadvantaged backgrounds. Given that Staples Corner and the surrounding areas have a high Black, Asian and Minority Ethnic population, regeneration in the area providing improved connectivity, infrastructure and employment opportunities is likely to benefit these groups.

- 7.4 The analysis also identifies some businesses may need to move to alternative premises whilst redevelopment takes place. This could affect some ethnic groups more than others. The draft SCGA Masterplan SPD recommends a phased approach to regeneration and that new development proposals retain businesses in the area and protect local employment wherever practical, supported by a Business Relocation Strategy.

## **8.0 Climate Change and Environmental Considerations**

- 8.1 The Staples Corner Masterplan has been developed from the outset with environmental sustainability embedded in the proposals with consideration to opportunities for an aspirational and innovative energy and sustainability strategy. It aspires to create a place that is low carbon, resource efficient, high quality and that promotes health and well-being for future generations.

- 8.2 The key objectives and aspirations are as follows:

- Proposals for new development at Staples Corner should be based on a fabric first approach with efficient services and exceed minimum requirements for carbon reductions.
- Passive solutions should be prioritised to mitigate potential overheating risk. Building massing should consider the surroundings, and buildings should be designed following London Energy Transformation Initiative (LETI) guidance with efficient form, solar orientation, and shape factor to maximize ability for natural ventilation in a dual-aspect flat configuration.
- Renewable energy generation should be maximised on site.
- A district heat network (DHN) is proposed, which could utilise the waste heat from the data centre on site (721-721A North Circular Road), and would offer a great opportunity for neighbouring buildings to connect and reduce their carbon footprint.

- 8.3 The above will help Brent to realise ambitions of its Climate & Ecological Emergency Strategy 2021-2030.

## **9.0 Human Resources/Property Considerations (if appropriate)**

- 9.1 None are identified.

## **10.0 Communication Considerations**

10.1 As per paragraph 3.2.7 statutory public consultation is required to advance the draft SCGA Masterplan SPD towards adoption. This will require social media targeted promotion to publicise and promote events that will be taking place.

**Related Document(s) for reference**

[Brent Local Plan 2019 - 2041](#)

**Report sign off:**

***Alice Lester***

Corporate Director of Neighbourhoods and  
Regeneration

## EQUALITY ANALYSIS (EA)

<b>POLICY/PROPOSAL:</b>	Staples Corner Growth Area (SCGA) Masterplan Supplementary Planning Document (SPD) and Public Engagement Strategy
<b>DEPARTMENT:</b>	Neighbourhoods and Regeneration
<b>TEAM:</b>	Regeneration
<b>LEAD OFFICER:</b>	Kirti Chovisia/Kiran Chauhan
<b>DATE:</b>	15 <sup>th</sup> April 2024

*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.

**Proposal:**

**SCGA Masterplan SPD**

Brent's Local Plan (2019-2041) identifies Staples Corner as one of eight Growth Areas in the borough, viewed as the most sustainable spatial expression for growth, exploiting brownfield land, good access to public transport and higher densities to deliver the majority of new homes alongside regeneration benefits and infrastructure. It outlines a vision to transform Staples Corner into a significant mixed-use community, prioritising industrial space that meets 21st century business needs in association with around 2,200 homes and social infrastructure.

Staples Corner is a designated Strategic Industrial Location, meaning it has importance at a London level. Its location near to the A5, A406 and M1 provides excellent road transport links, suitable for heavy goods vehicle access. However, as a gateway to Brent from wider London, Staples Corner presents a poor initial impression of the borough. Industrial intensification and mixed-use regeneration will make more effective use of the site, and provide a boost to business and employment, increase housing supply, and deliver infrastructure to support a growing population in this area.

Regeneration of the Staples Corner Growth Area (SCGA) is also an opportunity to improve links to the recently opened Thameslink Brent Cross West Station and Brent Cross regeneration in the neighbouring Barnet. There is potential for significant improvements to the townscape on the A5 Edgware Road and A406 North Circular Road, and improved access and enhancement of the Welsh Harp environmental asset.

A detailed Staples Corner Growth Area (SCGA) Masterplan Supplementary Planning Document (SPD) is required in order to establish the urban development framework and planning requirements for comprehensive and coherent regeneration of the area. The SCGA SPD will also include the Staples Corner Design Code, a set of concise, measurable and illustrated design requirements for new development coming forward in the Staples Corner Growth Area. It will provide landowners, developers, design teams and council officers with greater certainty about how development proposals should come forward.

The Council is committed to engaging the range of local businesses, residents and community groups located in Staples Corner and the surrounding area, to provide an opportunity to be a mutual author of the SCGA Masterplan, and thus shape the vision and future of the area. Stakeholder mapping has reviewed the population, demographics, businesses on the industrial estate, and location and profile of key organisation/institutions and surrounding residential neighbourhoods. A Public Engagement Strategy has also been developed for Masterplan, which outlines the objectives, principles, process and methods to be used in order to ensure local people and stakeholders are kept informed, can have their say and contribute to and influence the transformation of Staples Corner.

Recruitment of the Staples Corner Community Champions for the engagement process took place at project initiation. The Staples Corner Community Champions group consists of 25 individuals who live, work, run businesses, or own property in Staples Corner and the surrounding area. These individuals were selected to provide input and steer the development of the design code and the masterplan.

### **Objectives / Expected Outcomes:**

A Staples Corner Growth Area (SCGA) Masterplan SPD will:

- Establish the long-term vision and objectives for the SCGA;
- Encourage more effective and efficient land use through industrial intensification and residential co-location to increase industrial capacity and meet housing demand;
- Intensify capacity for industrial uses able to support business and employment growth, supporting both traditional and new/emerging growth sectors;
- Identify the amount and location of new homes, including affordable homes, through co-location, contributing to Brent's Local Plan housing target;
- Identify locations within the SCGA suitable for tall buildings;
- Plan supporting uses such as open spaces, infrastructure and public realm improvements;
- Provide for an integrated and permeable movement network for pedestrians, cyclists and public transport users, and promote 'Active Travel', raising the environmental quality of the area and delivering against the council's Climate and Ecological Emergency Strategy 2021-2030;
- Maximise the opportunity to benefit from the adjacent Brent Cross regeneration and new Brent Cross West Thameslink Station;
- Integrate into surrounding communities and existing housing stock, including setting a framework for linkages to the surrounding open and green spaces and LB Barnet;
- Conform with London and Local Plan policies and be a material consideration when assessing planning applications that come forward within the SCGA;
- Attract long-term investment into the growth area and provide certainty to investors;

The SCGA Public Engagement Strategy sets out how the council will meet the following consultation objectives:

- Provide businesses, landowners, residents and relevant stakeholders with enough opportunities to 'have their say', contribute their views and have influence on the future of Staples Corner and issues that are important to them;



- Ensure that enhancement and growth meets the needs and aspirations of local businesses and people, enabling the council to build effective partnerships and support long-term community stewardship;
- Demonstrate how meaningful consultation and engagement can have an impact on proposals and influence decision-making – “you said, we did”;
- Meet the Council’s ambition to engage a diverse range of local residents, businesses and communities when drawing up proposals and before taking decisions;
- Improve the Council’s reputation through consultations so it is perceived as listening to its residents and businesses and is responsive to their needs;
- Ensure that due regard is paid to the Council’s Public Sector Equality Duty (PSED) in carrying out all consultation activities.

**Initiative:** Industrial Intensification and Consolidation with Residential Co-location

**Objective:** The primary objective is to support the delivery of industrial intensification and consolidation with residential co-location in the Staples Corner area.

**Intended Results:** The aim is to create at least 2,200 new homes and address the challenges facing the area by embedding biodiversity net gain, climate change mitigation, and health and well-being improvements within the design code. The design code is expected to deliver consistent design quality and provide a robust framework for assessing development schemes during the planning process.

**Initiative:** Addressing Challenges and Improving Connectivity

**Objective:** Address issues of high car dependency, low land values, severance by major roads, low-density industrial land, and poor-quality cycling infrastructure.

**Intended Results:** Improve connectivity, reduce severance, and enhance the quality of public spaces. Active transport improvements, such as walking and cycling infrastructure, are key components of addressing these challenges.

**Initiative:** Place-based Recovery and Green-led Approach

**Objective:** Foster a green-led and place-based recovery in Brent, particularly in response to health and socio-economic impacts, including the Covid-19 pandemic.

**Intended Results:** Promote sustainable development, enhance biodiversity, mitigate climate change, and improve the overall health and well-being of the community. The design code is expected to align with the ambitions outlined in the recently adopted Local Plan.

Overall, the objectives of the initiatives above are to promote sustainable development, improve connectivity and public spaces, deliver new homes, and create a resilient and vibrant community in the Staples Corner area. The intended results include enhanced design quality, long-term planning certainty, and positive socio-economic and environmental outcomes.

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

The SCGA Masterplan Public Engagement Strategy and Design Code will affect various groups of people who live and work in Staples Corner and surrounding areas, including local businesses, existing and future residents, landowners, developers, community groups, and local councillors. Further details are set out below:

**Local businesses / employers / employees**

The SCGA Masterplan SPD will affect local businesses both within the growth area boundary and in neighbouring areas, including in LB Barnet. Depending on the proposals set out in the Masterplan SPD, some businesses or sub-areas may be affected more than others, and this will be considered closely when undertaking engagement activities.

**Local residents**

The SCGA is predominantly industrial with few residential areas. However, there are two known permitted developments containing residential flats: Hanover House (63 flats) and Myrddale Lodge (58 flats) within the Growth Area boundary. Also, those living in the residential areas surrounding Staples Corner, such as Dollis Hill, Cricklewood and Hendon, are also highly likely to be affected by development in Staples Corner. The SCGA Public Engagement Strategy outlines how residents will be engaged with throughout the development of the Masterplan, including those living within the Growth Area, and in surrounding areas in LB Brent and LB Barnet. The introduction of industrial intensification, consolidation with residential co-location, and the development of new homes may affect the local housing market, community dynamics, and quality of life for residents.

**Land and property owners / developers**

There are approximately 344 individual land interests in the SCGA, including 174 freeholders and 170 leaseholders. When taking into account landowners that own multiple land parcels, there are approximately 200 land and leaseholders in the area. The SCGA Masterplan Public Engagement Strategy identifies the need for engagement with land and property owners throughout the development of the Masterplan, for example through surveys and interviews.

**Service providers of social infrastructure**

This includes local schools, sports and recreation facilities, community groups, and health and social care facilities.

**London Borough of Brent departments**

Including staff from Regeneration, Planning, Housing, Property, Highways, Public Health, Customer & Digital Services, Environment Services, Growth & Employment, Strategy and Partnerships.

**London Borough of Barnet**

Given the location of Staples Corner on the boundary with LB Barnet, the SCGA Masterplan SPD will have important impacts on residents, businesses and communities within LB Barnet. The Council will engage with LB Barnet departments and local communities to ensure development is co-ordinated and seeks to benefit both boroughs.

**Transport and Infrastructure Providers**

Organisations responsible for transport infrastructure, such as Transport for London (TfL), National Highways and Network Rail, could be impacted by the proposed improvements in connectivity and public realm. They may need to coordinate their efforts to align with the objectives of the SCGA Masterplan and ensure effective integration of transportation systems.

**External and Statutory Agencies**

Canals & River Trust, Environment Agency, Greater London Authority, Natural England, Historic England, National Highways, Thames Water, Transport for London.

**Environmental Organisations**

The documents also focus on infrastructure, sustainability and energy within the SCGA and could involve collaboration with environmental organisations. These organisations could provide expertise and guidance on sustainable practices, ecological conservation, and achieving environmental objectives.

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 SCGA Masterplan SPD seeks to secure a range of measures to positively address any potential harm caused by new development to the environment. It will create a high quality and healthy environment that will maximise benefits to occupants and the local area and community. It is likely to benefit most occupants, workers, visitors, and developers who principally will benefit from an improved environment and cost-effective developments in the future.

#### **SCGA Masterplan SPD**

A SCGA Masterplan SPD will guide substantial regeneration and growth planned to be delivered in the SCGA over the next 20 years, and therefore should aim to remove or minimise disadvantages which are connected to characteristics of protected groups.

A future SCGA Masterplan SPD is highly likely to have relevance to the council's equality duty in a number of ways. For example, industrial intensification will have the potential to advance equality and employment opportunities for financially disadvantaged people, through provision of new business and employment spaces/affordable workspace, new jobs, training opportunities and opportunities for new start-ups. It also will aim to meet some of the affordable housing needs of the borough, including the needs of protected groups, including people with disabilities and elderly people. An improved public realm and provisions for safe walking/cycling routes would also have positive impacts on all groups.

Consistent with the aims of the general equality duty, the SCGA Masterplan SPD aims to eliminate unlawful discrimination, advance equality of opportunity, and foster good relations between different groups.

#### **SCGA Masterplan Public Engagement Strategy**

The SCGA Masterplan Public Engagement Strategy seeks to ensure all impacted groups have a say on the development of the Masterplan SPD and Design Code, including those with protected characteristics.

In order to bring about comprehensive redevelopment in the area, partnerships are required between existing and future communities, the Council, landowners and developers. The Public Engagement Strategy sets out how the council will engage with the various stakeholders, including groups with protected characteristics. One of the main consultation principles set out in the Public Engagement Strategy is to identify under-represented groups and make greater efforts to engage with them. In practice, this will include meeting with community organisations, utilising existing local networks, considering the needs of under-represented groups when organising workshops and events, and ensuring engagement materials are accessible. The engagement activities set out in this Strategy also have the potential to facilitate collaboration between community groups, and in achieving successful co-design of the Masterplan SPD and realising its objectives, foster good relations and create an inclusive local community.

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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	
<b>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.</b>		

## 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.

<p>Brent's Local Plan (2019-2041) identifies the SCGA as one of eight growth areas, viewed as the most sustainable spatial expression for growth, exploiting brownfield land, good access to</p>
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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. A SCGA Masterplan SPD will be developed to conform to both the Brent Local Plan (2019-2041) and the new London Plan.

The SCGA Masterplan Public Engagement Strategy is an opportunity to build positive relationships with businesses, residents and community groups in Staples Corner and surrounding neighbourhoods such as Dollis Hill, Neasden, Cricklewood and Hendon. The list below details the information and evidence gathered for the SCGA Masterplan and Public Engagement Strategy to date. The Masterplan SPD will continue to be developed in partnership with local communities, and further evidence will be gathered throughout this process. This evidence base will be expanded and updated as the Masterplan develops.

- Equality profile of Brent, 2020-21
- Brent Local Plan, 2019-2041
- ONS datasets from the 2021/22 Census
- GLA Population Projections
- Brent Borough Plan, 2023-27
- Brent Inclusive Growth Strategy (2019-2040)
- Joint Strategic Needs Assessment (JSNA), 2019-20, London Borough of Brent
  - Indices of Deprivation
  - Migrants and refugees
  - Economy and Employment
- Black Community Action Plan, 2020
- Stakeholder Mapping Report, including land ownership and demographics analysis undertaken by Regeneration Team
- Advice from colleagues in Regeneration, Planning, Communications, Partnerships and Engagement
- Learnings from previous Masterplan Public Engagement Strategies, such as the Church End Growth Area Masterplan public engagement.
- Wider research on engagement with under-represented groups

#### **External Stakeholder Engagement**

The SCGA Masterplan SPD has been developed based on robust analysis and stakeholder engagement, including:

- 1:1 meetings with landowners and leaseholders
- 1:1 meetings with key stakeholders, statutory consultees and LB Barnet
- An online platform reaching out to a greater number of stakeholders, residents, businesses, community groups, etc.
- Online survey: local residents survey, business survey with employers and business owners.
- Door knocking and drop-in sessions with local business and filling survey within Staples Corner.
- In person splash event within SCGA and online engagement sessions.

#### **Internal Stakeholder Engagement**

The development of the masterplan was also advised by the following Council's teams: Planning; Transport Planning; Partnerships; Property; Parks; Highways and Environmental Services and Climate Action.



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

<b>AGE</b>	
<b>Details of impacts identified</b>	<ul style="list-style-type: none"> <li>• <b>Environment and Infrastructure:</b> The final SCGA Masterplan SPD would have potential to deliver significant improvements to the local environment and movement infrastructure, including public/green spaces, community facilities, crossings, and an enhanced public realm. This would benefit groups of all ages.</li> <li>• <b>Employment opportunities:</b> By securing new modern and fit for purpose employment spaces, the SCGA Masterplan SPD has potential to attract higher value jobs to the area for local people, as well as training and apprenticeship opportunities.</li> <li>• <b>Housing, including affordable housing/workspace:</b> The final SPD is likely to meet some of the borough’s general needs housing, affordable housing and local employment needs, which would have positive impacts on all community groups and ages, especially those who are socio-economically disadvantaged.</li> <li>• <b>Engagement:</b> Older people are more likely to be digitally excluded or less able to participate in engagement activities delivered online, including via the Have Your Say page. Young people are also often under-represented in consultation activities, and given Dollis Hill’s large youth population, the Council will need to make efforts to engage with this age group. In order to ensure people of all ages are included, the Council will adopt a mixed methods approach to public engagement, producing both online and offline consultation materials to be disseminated across a variety of platforms and formats. In particular, the Council will deliver interactive workshops with schools and community organisations, use printed media such as flyers, paper surveys, freepost, as well as undertake door knocking and drop-in sessions.</li> <li>• <b>Health, mobility and well-being:</b> sustainable requirements could reduce the cost of heating and servicing homes. This may benefit the elderly, specifically those on lower incomes who are more likely to suffer fuel poverty. Cleaner and greener transport infrastructure are likely to benefit all those without access to a motor vehicle.</li> <li>• Good quality open spaces and effective greening will improve environment and encourage people of all age to use them.</li> </ul>
<b>DISABILITY</b>	
<b>Details of impacts identified</b>	<ul style="list-style-type: none"> <li>• <b>Public realm:</b> One of the aims of a SCGA Masterplan SPD is to deliver public realm improvements, such as public/green spaces and movement infrastructure including the number of crossings. This has the potential to benefit all groups including disabled people.</li> <li>• <b>Accessible Housing:</b> Provision of new wheelchair accessible and adaptable housing and blue badge parking designed and built to</li> </ul>

	<p>modern DDA standards would be beneficial to people with disabilities.</p> <ul style="list-style-type: none"> <li>• <b>Engagement:</b> People with some learning disabilities may find online surveys challenging and face difficulties understanding engagement materials. Efforts will be made to tailor engagement materials to the audience. This may include engaging with local organisations such as Brent Mencap and producing easy read versions of engagement materials. Efforts will also be made to ensure in-person events are accessible for wheelchair users.</li> </ul>
<b>RACE</b>	
<b>Details of impacts identified</b>	<ul style="list-style-type: none"> <li>• <b>Black, Asian and Minority Ethnic (BAME) communities:</b> According to the 2021 Census, 66% of the population of Dollis Hill were from BAME groups. There is a particularly high population of Black African, Pakistani and Indian people, as well as a higher than average other Asian population. Regeneration in the area is likely to benefit these groups through improved connectivity and public realm.</li> <li>• <b>Business Relocation:</b> The final SCGA Masterplan SPD could disproportionately affect employees from certain ethnic groups or races where businesses are relocated during redevelopment. Some sub-areas of Staples Corner have higher numbers of employees from certain races or ethnicities. For example, there is a significant Chinese population working in the Wing Yip area. There is also a high Indian population across much of Staples Corner. In order to mitigate potential negative impacts of business relocation, the Council will adopt a phased approach to relocation and require new development proposals to seek to retain businesses in the area and protect local employment. Developments impacting industrial sites will be supported by a Business Relocation Strategy that demonstrates how the applicant will work with existing businesses that wish to be retained/relocated. The council will continue to monitor and engage with businesses and residents to mitigate potential negative impacts.</li> <li>• <b>Housing:</b> Certain ethnic groups may have specific housing requirements, for example, larger family groups who choose to live in the same home may require larger houses. The Masterplan SPD promotes the provision of a range of new housing types and sizes to accommodate various local housing needs and support a diverse community. Lower incomes mean a higher prevalence on cheaper forms of accommodation. They will therefore benefit from improved standard of accommodation that the Design Code seeks to ensure.</li> <li>• <b>Engagement:</b> The Public Engagement Strategy recognises the need to strengthen and build connections with under-represented Black, Asian and Minority Ethnic groups and make greater efforts to engage with them. This includes translating engagement materials where appropriate and strengthening partnerships with local voluntary sector organisations. The council will also undertake a mixed methods approach to engagement, including targeted workshops and drop-in sessions, and will carefully</li> </ul>

	consider timings and location to ensure that as many people as possible can participate.
<b>SEX</b>	
<b>Details of impacts identified</b>	<ul style="list-style-type: none"> <li>• Safety: Increased surveillance and high quality public realm is likely to provide increased safety, something which is particularly impact women.</li> <li>•</li> </ul>
<b>SEXUAL ORIENTATION</b>	
<b>Details of impacts identified</b>	<ul style="list-style-type: none"> <li>• No obvious impacts upon groups with the protected characteristics of Gender Reassignment is identified in this equality analysis.</li> </ul>
<b>PREGANCY AND MATERNITY</b>	
<b>Details of impacts identified</b>	<ul style="list-style-type: none"> <li>• No obvious impacts upon groups with the protected characteristics of Gender Reassignment is identified in this equality analysis.</li> <li>• <b>Community Spaces:</b> Increased community spaces will offer more opportunities for accessing services and support.</li> <li>• <b>Public/Green Spaces:</b> Connected network of safe and accessible public, green and playful spaces will also provide more opportunities and support for women in pregnancy and/or with children.</li> </ul>
<b>RELIGION OR BELIEF</b>	
<b>Details of impacts identified</b>	<ul style="list-style-type: none"> <li>• The Brent Local Plan notes that there should be consideration to delivering religious buildings and other social infrastructure to support a larger residential and business community. The Masterplan SPD seeks to provide community infrastructure that is adaptable and could support a range of faith requirements. Public realm improvements will also improve connectivity and access to other local religious premises, potentially having a positive impact on various religious groups.</li> </ul>
<b>GENDER REASSIGNMENT</b>	
<b>Details of impacts identified</b>	<ul style="list-style-type: none"> <li>• No obvious impacts upon groups with the protected characteristics of Gender Reassignment is identified in this equality analysis.</li> </ul>
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>	
<b>Details of impacts identified</b>	<ul style="list-style-type: none"> <li>• No obvious impacts upon groups with the protected characteristics of Marriage &amp; Civil Partnership is identified in this equality analysis.</li> </ul>

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

No.

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

**SCGA Masterplan SPD**

The SCGA Masterplan SPD has been developed since 2022 through consultation with a wide range of key stakeholders including businesses/employees, residents, landowners, community groups, local councillors and internal stakeholders, with a focus on ensuring participants are representative of the people who will be affected by the Masterplan. The Council is committed to re-engaging the local community throughout the statutory public consultation process by summer 2024. The Equality Analysis of the SCGA Masterplan SPD will be updated once further engagement has taken place.

**Design Code**

Recruitment of the Staples Corner Community Champions for the engagement process took place at project initiation. The Staples Corner Community Champions group consists of 25 individuals who live, work, run businesses, or own property in Staples Corner and the surrounding area. These individuals were selected to provide input and steer the development of the design code and, potentially, the masterplan. The recruitment process, selection criteria, and demographics of the Community Champions group were evaluated by external consultants in relation to the broader population of Brent borough. Additional methods for the engagement strategy, such as outreach efforts, methods used to recruit and engage marginalised groups, and efforts to include various perspectives, were also relevant in determining the representativeness of the engagement process.

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

**Census data:** The demographics analysis of Staples Corner and surrounding areas is based primarily on 2021 Census data. Detailed and up-to-date information on race, ethnicity and language helped inform how the Council engages with the business community and identify any further equality impacts.

**SCGA Masterplan SPD:** The document is based on the policies set out in the Brent Local Plan, and the London Plan. These documents have gone through significant and rigorous scrutiny, both by the Council, residents, and other stakeholders. As such, it is considered that the SCGA Masterplan SPD as a result is based on a robust and evidence based approach, and therefore does not require any further evidence.

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?

**SCGA Masterplan SPD**

Once the SCGA Masterplan SPD has been adopted, the Council is expected to consider the need to review the document every five years to ensure it remains relevant over the Local

Plan period. Notwithstanding this potential for review, the guidance must be sufficiently flexible and capable of responding to changes in market demands and commercial and economic circumstances. These are factors that can radically change in a short space of time.

The impact of the Masterplan will be assessed by monitoring the policies in the Local Plan and through the annual Authority Monitoring Report.

The SCGA Masterplan SPD will also provide 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 SCGA is planned to be delivered over a period of approximately 15-20 years.

#### **Design Code**

The impact of the Design Code will be assessed by monitoring the policies in the Local Plan and through the annual Authority Monitoring Report.

## **SECTION C - CONCLUSIONS**

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

#### **SCGA Masterplan SPD**

The SCGA Masterplan SPD aims to deliver new jobs, homes and infrastructure, and in doing so 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. By facilitating these objectives, the final SCGA Masterplan SPD has the potential to benefit the businesses, residents and diverse communities in Staples Corner and surrounding areas.

The final SCGA Masterplan SPD will potentially have positive impacts on existing and new communities, including groups with protected characteristics, as it will identify a range of placemaking, environment and sustainability principles which should apply to and guide comprehensive redevelopment of the area. There may also be specific positive impacts on groups with protected characteristics. Improvements to the public realm is likely to benefit all groups, particularly people of different age groups and those with disabilities. Provision of accessible and affordable housing will also benefit disabled people and those from socio-economically disadvantaged backgrounds. Given that Staples Corner and the surrounding areas have a high Black, Asian and Minority Ethnic population, regeneration in the area providing improved connectivity, infrastructure and employment opportunities is likely to benefit these groups.

The main potential negative impact of the SCGA Masterplan SPD that is identified is that some businesses might need to be relocated to alternative premises whilst redevelopment takes place. This could affect some ethnic groups more than others. The Council proposes a phased approach to relocation and will require new development proposals seek to retain businesses in the area and protect local employment, supported by a Business Relocation Strategy.



The SCGA Masterplan SPD will assist the Council in securing better quality residential development and industrial intensification improving the borough's environment and tackling climate change. This will positively impact upon a range of protected characteristics, helping to reduce inequalities for Brent residents in and around the Growth Area and consequently the quality of life generally for all.

## SECTION D – RESULT

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

## SECTION E - ACTION PLAN

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


<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>
SCGA Masterplan SPD Early and pre-statutory engagement	Collate and review all comments received during pre-statutory engagement and produce a Consultation Statement.	KC	Summer 2023
Development of the SCGA Masterplan, informed by further research/analysis and feedback from engagement activities. Modifications made to Equality Analysis and Public Engagement Strategy where necessary.	Integrate learnings from research and all comments from public consultation into the Masterplan.	KC	Spring/Summer/Autumn 2023
Statutory public consultation of the Draft SCGA Masterplan SPD for a minimum of six weeks	Review of all comments received throughout the consultation process	KC	Summer 2024

Final modifications and adoption of the SCGA Masterplan SPD, and Equality Analysis updated	The SCGA Masterplan SPD will now apply, any development proposals must take into account and adhere to the principles set out and guidance provided	KC	Autumn/Winter 2024
Review periodically (every five years)	Monitor and review equalities impacts	KC	n/a
Determine applications in accordance with the SCGA Masterplan SPD	Improved environment and development meeting policy requirements in London and Local Plan.	Development Management Officers, Planning Policy Officers, Urban Design Officer, Transport Officers and Environmental services	On-going

#### SECTION F – SIGN OFF

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Kirti Chovisia, Regeneration Officer
<b>REVIEWING OFFICER:</b>	Kiran Chauhan, Project Manager
<b>HEAD OF SERVICE:</b>	Jonathan Kay, Head of Regeneration ; 15 <sup>th</sup> April 2024

 <b>Brent</b>	<b>Cabinet</b> 28 May 2024
	<b>Report from the Corporate Director Children and Young People</b>
	<b>Lead Member – Cabinet Member for Children, Young People and Schools (Councillor Gwen Grahl)</b>
<b>Outcome of Formal Consultation on School Organisation Proposals for Leopold Primary School in Primary Planning Area 4</b>	
<b>Wards Affected:</b>	Stonebridge & Roundwood
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>List of Appendices:</b>	Three Appendix 1: Statutory notice Appendix 2: Governing Board response to the consultation Appendix 3: Equalities Impact Assessment
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Shirley Parks Director, Education, Partnerships and Strategy 020 8937 4259 <a href="mailto:Shirley.parks@brent.gov.uk">Shirley.parks@brent.gov.uk</a>  Michelle Gwyther Head of Forward Planning, Performance and Partnerships 07388 859380 <a href="mailto:Michelle.Gwyther@brent.gov.uk">Michelle.Gwyther@brent.gov.uk</a>

## 1.0 Executive Summary

1.1. This report provides Cabinet with a summary of the formal consultation undertaken between 29 February 2024 and 28 March 2024 on the proposal to implement a phased closure of the Gwenneth Rickus site of Leopold Primary School.

## 2.0 Recommendation(s)

2.1 That Cabinet agrees to:

- (a) The variation of Leopold Primary School's Published Admission Number (PAN) from 120 to 60 from September 2025; and
- (b) The phased closure of provision on the Gwenneth Rickus site of Leopold Primary School between September 2025 and the end of July 2027.

### **3.0 Detail**

#### **3.1 Cabinet Member Foreword:**

3.1.1 Borough-wide projections indicate that demand for Reception school places will continue to fall over the next 5 years. Planning Area 4 has the greatest number and percentage of spare places of all the six Primary Planning Areas in Brent. Schools in the area have been managing the impact of falling rolls for several years with the support of the Local Authority. The request to reduce capacity at Leopold Primary School is to support the long-term sustainability of all schools in the area.

3.1.2 School place planning supports the Borough Plan Strategic Priority 4: The Best Start in Life, by ensuring there are sufficient school places for children and young people in Brent and supporting every child and young person to access high quality education in the borough.

#### **3.2 Background**

3.2.1 The primary school population across London, including Brent is reducing. Between 2012-2021 there was a 17% decrease of the birth rate in London, which is a reduction of 23,225 live births across the capital. As a result the GLA has predicted a 7.6% decrease in reception pupil numbers across London from 2022-23 to 2026-27 (from 96,424 pupils to 89,121 pupils over this period). This roughly equates to a decrease of 243 classes of children. The falling birth rate is compounded by Brexit and migration patterns following the pandemic. The impact on falling demand in Brent is reflected in the updated School Place Planning Strategy 2024-2028 approved by Cabinet in October 2023.

3.2.2 The number of children applying for primary school places in Brent has been reducing since a peak in 2017. The most recent population forecasts at ward level indicate this trend will continue for the next few years. Primary Planning Area 4, which covers the wards of Roundwood, Stonebridge and Harlesden and Kensal Green, has very high levels of surplus places currently and projections indicate a further reduction over the next few years (Brent School Place Planning Strategy 2024-2028).

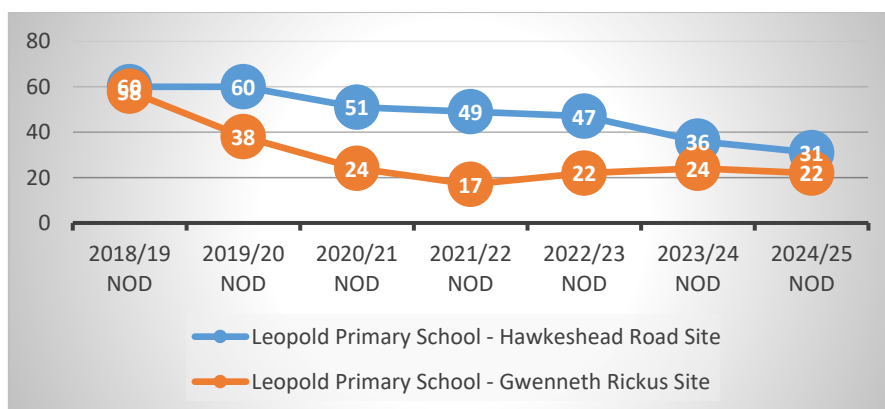
3.2.3 The local authority has been working with schools to manage the detrimental impacts of falling demand. A series of reorganisation strategies are currently being deployed including PAN reductions, federation arrangements and infant and junior school amalgamations. Officers are also connecting with local

authorities across London to share experiences and learn from strategies to successfully manage falling rolls. A number of local authorities across London have already consulted on closing local primary school provision or are planning to do so.

3.2.4 Leopold Primary School operates as one school under one leadership team and governing board across two sites. The main Leopold Primary School site is situated on Hawkshead Road within the Roundwood ward. The Gwenneth Rickus site of Leopold Primary School is situated on Brentfield Road within the Stonebridge ward. The Leopold Gwenneth Rickus site was opened in September 2013 in response to increasing demand for primary school places in Brent. The site was previously used by the borough as a school improvement centre running courses for education professionals. Currently children attending each of Leopold Primary School’s two sites receive all of their education exclusively at that site. The school achieves good outcomes for pupils at or above national averages at all key stages and was rated by Ofsted as ‘Good’ in June 2022.

3.2.5 Currently Leopold Primary School offers 120 places a year, with each of its site accommodating two forms of entry. However, the Gwenneth Rickus site currently operates an informal cap of one form entry in Reception, Year One, Year Two and Year Four in response to falling demand. For the purposes of admissions when applying for a place at Leopold Primary School, parents can make a preference for either the Hawkshead Road site or the Gwenneth Rickus site on Brentfield Road. As shown in graph 1 below, the number of children applying for and receiving an offer of a place at the Gwenneth Rickus site through Reception co-ordination has been at a consistently lower rate since 2019 than the number choosing the Hawkshead Road site. This graph includes National Offer Day data for the 2024/25 academic year.

**Graph 1: National Offer Day offers at Leopold Primary School**



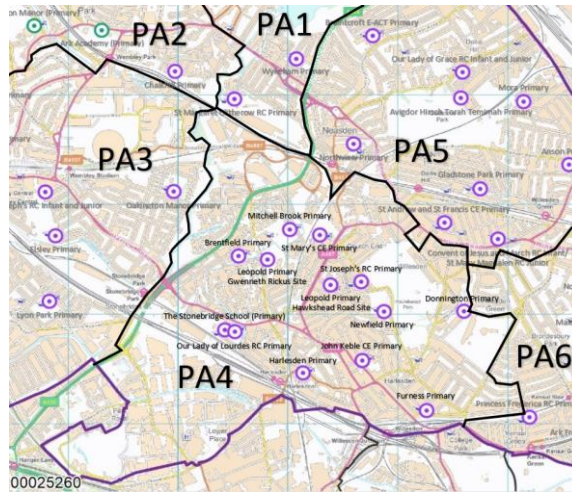
*National Offer Day occurs from 16 April each year.*

3.2.6 In the context of falling demand, there is no longer a need for Leopold Primary school to be split across two sites as there are sufficient spare places on both the Leopold Primary School Hawkshead Road site and in other local schools to accommodate future demand for primary provision in the area. The Gwenneth Rickus Leopold site is less than one mile to seven other Primary schools,



including Brentfield, Mitchell Brook and Stonebridge Primary Schools as seen in the map below.

**Map 1 – Map of Primary Planning Area Four schools**



3.2.7 Within this context, on 16 October 2023, Cabinet was informed of the intention to undertake informal consultation on the future provision on the Gwenneth Rickus site of Leopold Primary School. This was approved and a period of informal consultation was carried out between 1 November 2023 and 13 December 2023. The outcomes of this consultation were reported to Cabinet on 5 February 2024 with a request to approve a period of formal consultation through publication of a statutory notice. Cabinet agreed to the request to move to the formal consultation stage.

#### **4.0 Stakeholder and ward member consultation and engagement**

##### **4.1 Consultation**

4.1.1 Formal consultation to change the provision of Leopold Primary School was carried out in accordance with the Department for Education (DfE) statutory process outlined in 'Making significant changes ('prescribed alterations') to maintained schools Statutory guidance for proposers and decision makers January 2023'.

4.1.2 The statutory consultation process for significant changes to school provision has four stages - Stage 1: Publication of a Statutory Notice, Stage 2: Representation (formal consultation) for a period of 4 weeks, Stage 3: Decision, whereby Cabinet is required to make a decision on the proposal within two months, and if agreed then Stage 4: Implementation.

4.1.3 A period of formal consultation was carried out between 29 February 2024 and 28 March 2024. A statutory notice (provided in Appendix one) was displayed adjacent to the main school gates on the Hawkshead Road site and the Gwenneth Rickus site of Leopold Primary School. The proposal was published in the Brent and Kilburn Times. Both of these actions were required as per the DfE guidance. The statutory notice proposed:

- a change to the school's published admission number so that only 60 children are admitted to the Hawkshead Road site from 2025 with no children admitted to the Gwenneth Rickus site in reception.
- to implement a phased closure of the provision on the Gwenneth Rickus site with full closure taking place at the end of July 2027.

4.1.4 To ensure the formal consultation was accessible to families, the notice was translated into Arabic and Somalian as the two main languages of the communities of the school. A short letter describing the proposal and how to respond was provided for the school to distribute to parents and carers in both hard copy and electronic format in English, Arabic and Somalian. The documents were published on the school admissions webpages on Brent's website, which enabled the document to be translated into any language, and the formal consultation was included on the Brent 'Have your say' consultation portal.

## 4.2 Responses to the Formal Consultation

4.2.1 Only one response was received to the formal consultation from the Chair of Governors at Leopold Primary School. The full submission from the Governing Board is attached at Appendix 2.

4.2.2 The Governing Board's response to the consultation sets out their disappointment that the local authority is continuing to propose the closure of the Gwenneth Rickus site, which is rated as 'Good' by Ofsted and given that the majority of respondents during informal consultation did not agree to the proposal. Other points raised are summarised here:

4.2.2.1 Objection to the phased closure as parents were reassured during the informal consultation that children currently in the school would not be affected and that the proposed closure date would impact on the viability of the school over the next 3 years as parents and teachers may decide to leave.

Response: Officers have been clear throughout the consultation process that children currently in Reception, Year 1 and Year 2 and those entering reception in September 2024 would be the year groups affected and those in years 3 to 6 would be able to finish their education at the Gwenneth Rickus site. The local authority's view is, even with up to a 10% reduction of on-roll numbers, if parents decide to change their child's school the Gwenneth Rickus site will remain viable to operate until July 2027.

4.2.2.2 Concerns about the need for further redundancies after the school has already undertaken a staff restructure to manage the school budget effectively, which will affect staff morale and the school community.

Response: The local authority recognises that a Cabinet decision to close the Gwenneth Rickus site would be a disappointing decision for the staff and wider school community. Officers from across the

Council would support the leadership team and Governing Board to manage the closure process and issues that arise as a result, such as potential redundancies, to ensure that the school continues to deliver a high quality education.

- 4.2.2.3 That there are other schools with falling rolls in the local area who should be considered for closure and that a more strategic approach than closing this site and reducing the PAN of Mitchell Brook Primary School is required to address the scale of the issue. The Governing Board provided an analysis of factors that should form the basis of decision-making during the informal consultation period that has been ignored.

Response: The Local Authority's proposal to close the Gwenneth Rickus site was based on a significant amount of work which was undertaken prior to the informal consultation and included a strategic analysis of a number of different factors. The Local Authority reviewed the Governing Board's analysis provided during the informal consultation process and responded to points raised in the February 2024 Cabinet report.

- 4.2.2.4 That the Council has failed to appreciate that the two Leopold Primary School sites are two distinct communities and staff bodies and the impact of the closure on vulnerable children and families.

Response: The Local Authority recognises that the two sites of Leopold Primary School operate as distinct communities, despite having shared leadership and governance. 61.9% of respondents to the informal consultation indicated that, if the proposal were to go ahead, they would like it to be as a phased closure and this is the proposal which has been put forward to Cabinet. Local Authority officers would work with the school leadership team to support vulnerable children and families if the decision is taken to close the provision.

- 4.2.2.5 That it appeared the Gwenneth Rickus site had been ringfenced for closure, with a decision already made, and that proposal is inconsistent with the need for wider reductions proposed in the Review of Primary School Places in Primary Planning Area 4 document.

Response: No decision has been made regarding the future of the Gwenneth Rickus site, as this is for Cabinet to determine. The proposal to close the site is a recommended approach which is being undertaken by other London local authorities on a wider scale, and the Council is following a process as set out by the DfE for managing significant change to maintained schools. The proposal to close the Gwenneth Rickus site forms one part of the response to surplus capacity in Primary Planning Area 4, as set out in the School Place Planning Strategy 2024 – 2028. The reduction of PAN at Mitchell

Brook Primary School, which is now confirmed for September 2025 forms another part of that response.

4.2.3 The Local Authority acknowledges the quality of education provided by Leopold Primary School to deliver a good standard of educational provision as judged by Ofsted. However 96.7% of Brent primary schools are rated Good or Outstanding by Ofsted and, this includes all schools in Planning Area Four, other than one school which is making rapid improvement. Officers are confident that the remaining schools in the area will provide a suitable education for future cohorts of children.

4.2.4 The proposed closure of the Gwenneth Rickus site of Leopold Primary School will require some children attending the site to move to the Hawkshead Road site of Leopold Primary School from September 2027. There will also be parents who had hoped for siblings of their children currently attending the site to join the school at some future point in Reception, which would not be possible from September 2025 onwards when admissions to the site cease. However, other than the concerns identified above in section 4.2, no issues were raised during the formal consultation to indicate that the closure proposal should not proceed. Officers therefore recommend to Cabinet that the proposal as set out in Section 2 (Recommendations) is agreed.

### 4.3 Implementation

4.3.1 The Gwenneth Rickus site can continue to operate until July 2027 with a viable number of classes. Table 1 below details the projected number of children on roll in each year group up to the point of the proposed closure date.

Year	Rec	Y1	Y2	Y3	Y4	Y5	Y6	Total
2023/24*	26*	28	26	37	42	35	54	248
2024/25**	25***	23	25	23	33	38	32	200
2025/26**	0	23	21	23	21	30	34	151
2026/27**	0	0	20	19	20	19	27	106

\* Based on January 2024 census figures

\*\* Assumes a 10% reduction in on-roll numbers each year

\*\*\* Projection based on April 2024 offer numbers.

4.3.2. As Cabinet has determined admissions arrangements for community schools for 2025/26 (in February 2024 in line with statutory requirements), should the proposal be agreed, the local authority will be required to submit a referral to approve a variation to the published admission arrangements for the school to the Office of the Schools' Adjudicator.

4.3.3 Officers would support the leadership team and governing body of Leopold Primary School through the transition period. A steering group will be set up whereby officers from the Setting and School Effectiveness Service, HR, finance, capital and legal will provide advice and guidance to the school through what it is acknowledged will be a difficult time.

4.3.4 Admissions Officers will continue to work with the school to facilitate in-year admissions to the Gwenneth Rickus site until the point of closure if applications for the school are received.

4.3.4 Children who attend the Gwenneth Rickus site and who will remain on roll at the school from September 2027 will be transferred to the Hawkshead Road site. The Hawkshead Road site may require additional teaching space to be made available for children transferring from the Gwenneth Rickus site, but this can be achieved using existing capacity within the current school building. The steering group detailed in section 4.3.3 will work with the leadership of school to understand how they wish to deliver education from September 2027. This could require some minimal capital expenditure at a cost to the Council.

4.3.5. Table 2 indicates the projected number of children on roll in each year group at the Hawkshead Road site following a phased closure of the Gwenneth Rickus site.

Table 2:								
Year	Rec	Y1	Y2	Y3	Y4	Y5	Y6	Total
2027/28	48	48	47	68	68	63	66	409
2028/29	51	48	48	47	66	66	62	388
2029/30	53	51	48	48	47	65	65	377
2030/31	55	53	51	48	48	47	63	365
2031/32	58	55	53	51	48	48	47	360

4.3.6 Any parent who does not wish their child to transfer to the Hawkshead Road site from September 2027 can apply through the normal in-year admissions process for a place at an alternative school. Although many schools in the area currently have vacancies, places will not be held specially for children moving from the Gwenneth Rickus site and applications will be considered according to each schools' admission arrangements.

## 5.0 Financial Considerations

5.1 School funding received via the Dedicated Schools Grant (DSG) is driven by pupil numbers, and vacant school places cause a financial pressure for schools as they will need to operate with reduced budgets. A small number of schools have applied for a licenced deficit and several schools in the primary phase remain at risk due to the knock-on effect of falling rolls in Brent and across London. A licenced deficit enables a school to hold a deficit balance for a period of three years while implementing an agreed plan on how to return to a balanced position at the end of the three-year period. This approach becomes increasingly difficult as pupil numbers continue to fall leading schools to undertake staff restructures which have a financial cost arising from redundancies and will not be sustainable.

5.2 Leopold Primary school's main source of income is from the Dedicated Schools' Grant (DSG). The school reported a surplus reserves balance of £0.986m as at end of March 2024. The school planned to use almost all of the reserve



balance by March 2025/26 on goods and services including some planned capital works, however this is subject to change following submission of the three year plan in June 2024. The school undertook a restructure in 2022/23, to match staff numbers to pupil numbers due to continued falling rolls across the two sites and to ensure financial viability. The restructure cost absorbed by the school was £0.250m.

- 5.3 The school receives a per pupil funding rate of £6,221 with approximately 579 pupils reported in the October 2023 census (a reduction of 55 pupils compared to October 22). This equates to £3.6m DSG funding, inclusive of £0.92m split site funding allocation. This compares to an average of £6k per primary pupil across the borough. The closure of the site will lead to a more efficient use of the DSG as spare places in other schools are utilised for new cohorts of children. There may be support required towards redundancy payments as the school would be required to restructure its staffing resources to address the risk of reduced funding from the reduced number of pupils.
- 5.4 There would be general fund cost implications to maintain the Gwenneth Rickus site if it remained vacant, including utilities and any security provisions that officers felt were required. The costs and the budget required are yet to be confirmed but could be in the region of £20,000 per site per annum, depending on the level of resources involved to look after the site.

## **6.0 Legal Considerations**

- 6.1 The authority has the power to consider and determine proposals published under Section 19 of The Education and Inspections Act 2006, pursuant to Section 21 (2) (f) of the Act and in accordance with Schedule 3 paragraph 3 of The School Organisation (Establishment and Discontinuance of Schools) Regulations 2013.
- 6.2 Under sections 13 and 14 of The Education Act 1996, as amended by The Education and Inspections Act 2006, a local education authority has a general statutory duty to ensure that there are sufficient school places available to meet the needs of the population in its area. The local authority must promote high educational standards, ensure fair access to educational opportunity and promote the fulfilment of every child's educational potential. They must also ensure that there are sufficient schools in their area and promote diversity and increase parental choice. To discharge this duty, the LA has to undertake a planning function to ensure that the supply of school places balances the demand for them.
- 6.3 If the proposals which form the basis of the formal consultation were to be implemented, then this would have the potential impact on the reduction of staff required with the effect of the staff being placed at risk of redundancy or redeployed to the Hawkshead Road site.
- 6.4 Although not part of the considerations for the site proposed to be closed, any change of use from Education use and/or disposal requires the permission from

the Secretary of State for Education under Section 77 of the School Standards and Framework Act 1998 and Schedule 1 of the Academies Act.

## **7.0 Equality, Diversity & Inclusion (EDI) Considerations**

- 7.1 The Public Sector Equality Duty under section 149 of the Equality Act 2010 requires the Local Authority when exercising its functions to have due regard to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a protected characteristic and those who do not share that protected characteristic. The protected characteristics covered under the Act are age, disability, gender reassignment, marriage and civil partnership (only in respect of eliminating unlawful discrimination) pregnancy and maternity, race (this includes ethnic or national origins, colour or nationality) religion or belief (this includes lack of belief) sex and sexual orientation. Due regard means giving relevant and proportionate consideration to the duty, in that whenever significant decisions are being made consideration must be given to the impact/affect that implementing a particular decision will have in relation to equality before making that decision. Brent Council also has a policy of considering Human Rights and socio-economic impact.
- 7.2 An Equality Analysis has been carried out on the proposals set out in this report and is attached as Appendix 3 to this report. It is not anticipated there will be any negative impact from these proposals on the basis of disability, gender reassignment, marriage and civil partnership (only in respect of eliminating unlawful discrimination) pregnancy and maternity, race (this includes ethnic or national origins, colour or nationality) religion or belief (this includes lack of belief) sex and sexual orientation.
- 7.3 Pupil-level data suggest that the intake at the Leopold Primary School Gwenneth Rickus site is similar to other local schools in terms of ethnic diversity, children on free school meals and the number of children with special needs and disabilities (SEND). This proposal could have a negative impact on individual children depending on their individual needs if they were required to move schools. However, based on current information other local schools would provide a suitable alternative and would support children to settle.
- 7.4 The top three ethnic groups attending Leopold Primary School match the top three ethnic groups across Primary Planning Area 4, although the proportion of each group is higher in Leopold Primary School. The proportion of children receiving benefits related Free School Meals at the school is 32.8% compared to 33.2% for the whole planning area. The proportion of children at Leopold Primary School with an EHCP is 1.5% compared to 3.7% across the whole planning area. The proportion of children at Leopold Primary School receiving SEN Support is 9.2% compared to 18.1% across the whole planning area.

## **8.0 Climate Change and Environmental Considerations**

- 8.1 School place planning and admissions policies aim to ensure that primary children can attend a local school and therefore can walk to school or take

public transport. This approach underpins these proposals. All schools in Brent can access support to develop a sustainable travel plan.

## **9.0 Human Resources/Property Considerations**

- 9.1 Implementation of the proposal to close the Leopold Primary School Gwenneth Rickus site would be likely to impact on the required staffing for Leopold Primary School, as it would lead to a reduction in overall staffing levels. This could therefore result in the possibility for the need to consider redundancies and/or relocation of staff to the Hawkshead Road site. The number of staff affected would depend on the nature of the phased closure. The school, supported by the Local Authority and the school's HR provider, would need to follow the Managing Change in Schools Policy and Procedure including consultation with affected staff and trade unions to effect the changes in due course. The Local Authority would work with the governing boards of local schools to see if affected staff could find local re-employment.
- 9.2 Should a decision be made to close the Gwenneth Rickus site of Leopold Primary School, then the building and site would become surplus to requirements for mainstream primary school use. At that time the Council will review its priorities and potential future uses for the site, but the expectation is that the site is retained for educational use given the need for other forms of local educational provision, for example for children and young people with SEND.

## **10.0 Communication Considerations**

- 10.1 If the proposal is agreed, Cabinet's decision would be communicated to all stakeholders, including staff and families attending the school who will be affected by the decision. Information for families would include details about which of the current year groups would be affected, and which year groups would be unaffected as the children will have left the school by the time of the closure.
- 10.2 Information would be provided to families where consideration is given to moving their children to the Hawkshead Road site closer to the time of implementation. Advice and guidance would be provided to any families who apply to move to a different school at any point before the closure of the Gwenneth Rickus site.
- 10.3 If Cabinet do not agree to the proposal, stakeholders would be notified that the proposal will not go ahead.

### **Related document(s) for reference**

Review of Primary School Places in Primary Planning Area 4 – Cabinet Report 16 October 2023

Outcome of informal consultation on school organisation proposals for Leopold Primary School in Primary Planning Area 4 - Cabinet Report 5 February 2024

**Report sign off:**

***Nigel Chapman***

Corporate Director Children and Young People



## **Statutory Proposal**

### **Alteration to Leopold Primary School – Full Proposal**

**Publication Date: Thursday 29 February 2024**

**Deadline for representations: Thursday 28 March 2024**

### **School and Local Authority details**

#### **The Proposer:**

London Borough of Brent, Children and Young People, 3<sup>rd</sup> Floor Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ.

#### **The School:**

Leopold Primary School (Community), Hawkshead Road, London, NW10 9UR

Leopold Primary School is a co-educational community school with a published admission number of 120 places in the Reception year group (four forms of entry). Two forms of entry in this year group are allocated at the main site in Hawkshead Road, London, NW10 9UR and two forms of entry are allocated at the annex site, known as the 'Gwenneth Rickus Site' or the 'Gwenneth Rickus Building' at 242-250 Brentfield Road, Neasden, NW10 8HE.

Since 2013, the Governing Board of Leopold Primary School has managed the educational provision and staffing at the Gwenneth Rickus site as an extension of their existing provision. This arrangement was made permanent in 2015 and Leopold Primary School operates as one school with one leadership team and governing body across two sites.

Leopold Primary School has an age range of 3-11 years (including the nursery provision). This is the age range the establishment is legally allowed to make provision for. There are currently 840 places between both sites for years Reception to Year 6, not including nursery places with 420 at the main site in Hawkshead Road and 420 at the Gwenneth Rickus site.

Pupils attending each site continue attending the site until the end of Year 6, at which point they must apply to attend a secondary school or arrange to continue their education elsewhere. Children do not move between sites for educational purposes and parents view each site as a separate school serving its own community.

There are currently 246 pupils on the Gwenneth Rickus site. The current Key Stage one year groups each have less than 30 pupils on roll. There are 73 vacancies in the Key Stage two year groups.



The school achieves good outcomes for pupils across both sites and was rated by Ofsted as 'Good' in June 2022.

### **Description of alteration and evidence of demand**

Notice is given in accordance with section 19(3) and 21(2) of the Education and Inspections Act 2006 (as amended by the Education Act 2011) that Brent Council intends to make a prescribed alteration to Leopold Primary School, Hawkshead Road, London, NW10 9UR (Department for Education number 3042028).

In response to reduced demand for primary school places across the local area, it is proposed to close the educational provision of Leopold Primary School on the Gwenneth Rickus site.

This will involve:

- a variation of the school's Published Admission Number (PAN) from 120 to 60 for September 2025
- implementing a phased closure of the provision on the Gwenneth Rickus site.

The decision to propose the closure of the Gwenneth Rickus site of Leopold Primary School has been made in response to low demand in Primary Planning Area 4 (which includes the wards of Stonebridge, Roundwood and Harlesden and Kensal Green) and projections that indicate reducing demand for primary places across Brent (as indicated in the London Borough of Brent School Place Planning Strategy 2024-2028, approved by Cabinet in October 2023).

This area benefited from substantial expansion of school capacity between 2005 and 2017 in response to increasing demand for school places. However, demand for places in the area has been reducing over the past six years and the area currently has the highest number and percentage of spare places of Brent's six primary place planning areas. There are a total of 5,985 places available in the 12 schools in the area, but the number of pupils on roll has reduced from 5,249 in 2017 to 4,120 in 2023. As a result, there are high levels of spare places in each year group and the forecasts (based on the 2023 census) suggests this will not change over the next five years.

Demand for Leopold Primary School has been falling since 2018 and the Gwenneth Rickus site currently operates as one form of entry in some year groups, including Reception, Year 1 and Year 2. There are also spare places at the Hawkshead Road site in all year groups. In the context of this falling demand, there is no longer a need for Leopold Primary school to be split across two sites.

### **Objectives (including how the proposal would increase educational standards and parental choice)**

Leopold Primary School is one of 12 schools in the area known as Primary Place Planning Area 4 which covers the wards of Stonebridge, Roundwood, and Harlesden and Kensal Green and includes the following schools: Brentfield Primary School, Donnington Primary School, Furness Primary School, Harlesden Primary School, John Keble CE Primary School, Leopold Primary School, Mitchell Brook Primary School, Newfield Primary School, Our Lady of Lourdes

RC Primary School, St Joseph's RC Primary School, St Mary's CE Primary School and The Stonebridge School.

The Gwenneth Rickus Leopold site is located less than one mile to seven of the Primary schools listed above. There is sufficient availability of school places in the local area to meet the needs of any children who would otherwise have applied for a place at the provision in the future. Children currently receiving education at Hawkshead Road would not be affected and would continue their education at this school site.

Due to the high availability of places in Brent primary schools in Primary Place Planning Area Four, parents currently have a greater chance of securing a place at a preferred good or outstanding school than they did when the Gwenneth Rickus provision was first opened as a temporary provision in 2013.

### **The effect on other educational institutions within the area**

Other schools in Primary Place Planning Area Four will benefit from having additional children on roll to fill some of their spare places.

### **Project costs and indication of how these will be met, including how long-term value for money will be achieved.**

The cost of relocating children to alternative schools will be negligible, as a phased closure is proposed that will mean very few children would need to move school. If parents request a school move, this function will be carried out within the existing functions of Brent Council's School Admission and School Organisation team.

The closure of the Gwenneth Rickus site would be likely to impact on the required staffing for Leopold Primary School, as it would lead to a reduction in overall staffing levels. This could therefore result in the possibility for the need to consider redundancies and/or relocation of staff to the Hawkshead Road site. The school, supported by the local authority, would need to follow the Managing Change in Schools policy and procedure including undergoing consultation with affected staff and trade unions to effect the changes in due course.

The cost of maintaining the Gwenneth Rickus site following the closure of the provision will be met by the local authority. Should a decision be made to close the school site then the Council will consider the potential future use for the site in the context of its priorities which could include future educational use.

### **Implementation plan**

Brent Council is proposing to seek agreement, from the Schools Adjudicator to a variation to the admission arrangements for Leopold Primary School so that the Published Admission Number for the school is reduced from 120 to 60 for September 2025.

Brent Council is proposing to implement a phased closure of the provision on the Leopold Primary School Gwenneth Rickus site so no new admissions are made into any Reception

cohort from September 2025 and the site is fully closed at the end of July 2027. This will allow the majority of children to complete their current key stage before the provision is closed.

The children directly affected by this proposal are those currently in Reception, Year 1 and Year 2, as well as those children who will be admitted to the Gwenneth Rickus site in Reception in September 2024. This means that only children in Reception and Year 1 and Year 2 in academic year 2024/25 would need to move to the Hawkshead Road site if the Gwenneth Rickus site closed in summer 2027. The current Year 3 would complete their Year 6 in July 2027 and not be directly affected by the closure. From September 2025 any children offered a reception place at Leopold Primary School through co-ordination would only be admitted onto the Hawkshead Road site.

Children attending the site at the end of the 2026/27 academic year will be able to continue their education at the main site on Hawkshead Road. This will include the cohort of children attending the provision with a date of birth between 1 September 2016 and 31 August 2020.

Parents will also be able to apply to change their child's school either from September 2027 or at any other time in advance through the normal In-Year admissions process but they are encouraged to keep their child educated at Leopold Primary School. For children with an Education, Health and Care Plan which names the Gwenneth Rickus site provision, an alternative local school could be identified if this was parental preference through consultation with the Brent Special Educational Needs Advice 0-25 Team.

While the phased closure programme is underway, in-Year admission applications may still be made to any year group with an active class and places will still be available for up to 30 children in each class.

### **Statement explaining the procedure for responses: support, objections and comments.**

Within four weeks from the date of publication of this proposal any person may make objections, agreements and comments on the proposal in writing. They can do this in the following ways:

Write to Michael Rollin, Admissions and School Organisation Manager, Children and Young People, London Borough of Brent, 3<sup>rd</sup> Floor, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ or email: [leopoldconsultation@brent.gov.uk](mailto:leopoldconsultation@brent.gov.uk)

Provide your views via the Brent's Have Your Say consultation portal [www.brent.gov.uk/neighbourhoods-and-communities/have-your-say](http://www.brent.gov.uk/neighbourhoods-and-communities/have-your-say),

This proposal is available on this webpage [www.brent.gov.uk/leopoldconsultation](http://www.brent.gov.uk/leopoldconsultation) where you can find facilities to translate it into different languages.

Hard copies of this document will be available in English, Arabic and Somali and can be obtained by writing to Michael Rollin at the address above or emailing [leopoldconsultation@brent.gov.uk](mailto:leopoldconsultation@brent.gov.uk). They are also available from both of the Leopold School sites.

All applicable statutory requirements to consult in relation to these proposals have been complied with.

The last date for representations is **Thursday 28 March 2024**.

**Signed:** 

**Shirley Parks**  
**Director, Safeguarding, Partnerships and Strategy**

**Publication Date:** **Thursday 29 February 2024**

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## **Appendix 2 – Consultation submission from the chair of governors at Leopold Primary School, and local authority response**

I am writing to you on behalf of the Governing Board of Leopold Primary School to express our disappointment that Brent Council has taken the decision to launch a formal consultation into the closure of the Gwenneth Rickus (GR) site despite the outcome of the informal consultation.

Below I have listed the reasons why we oppose the recommendations included within the formal consultation and hope that you take these into consideration when making the final decision regarding the proposed closure of the GR site.

1. The proposed plan to close GR goes against the Borough Plan Strategic Priority 4: The Best Start in Life, which aims to support “every child and young person to access high quality education in the borough”. As stated in the report to Cabinet, Leopold Primary School “achieves good outcomes for pupils at or above national averages at all key stages and was rated by Ofsted as ‘Good’ in June 2022”. If the council is committed to achieving ‘The Best Start in Life’ for children living in Brent, then it would not be best practise to close a school that has been confirmed as providing a high-quality education, especially, over schools in the area that are in a lower Ofsted category or have not yet received an Ofsted Inspection.
2. We are extremely disappointed that the recommendation to implement a phased closure of provision on the Gwenneth Rickus site of Leopold Primary School between September 2025 and the end of July 2027 was not discussed with the Governing Board before being made publicly available, especially as parents were reassured that current pupils would not be impacted by the closure if it were to go ahead. The fixed closure date will immediately and materially negatively affect our ability to maintain the viability of the school over the next 3 years, as there is an increased likelihood that parents and teachers may decide to leave the school prematurely.
3. We had the foresight to take preventative action to reduce the impact of the falling pupil roll and Leopold Primary School recently went through a staff restructure, which has helped ensure that the school is in a financially viable position. Staffing restructures reduce the morale of staff, affect their mental health and wellbeing as well as negatively impacting the school community as a whole and was not a decision that we took lightly. We have sufficient financial reserves to maintain staffing and the quality of education for a number of years because of the tough choices we made. A phased closure of the GR site in July 2027, will mean that further redundancies are inevitable and the whole school community will have to endure this difficult process again, within a short period of time. It now seems that our efforts to secure the financial viability of the school may have been in vain. This is particularly frustrating given the financial situation of other schools in the area, who would still remain unviable.
4. The report to Cabinet, outlined that the reason for choosing to close the GR site rather than the HR site is because of “the number of children applying for and

receiving an offer of a place at the Gwenneth Rickus site through Reception co-ordination has been at a consistently lower rate since 2019 than the number choosing the Hawkshead Road site". If the rationale for closing GR is based on this, then the Review of Primary School Places in the Primary Planning Area 4 document outlines that there are 4 other schools that should have been considered based on this rationale. However, none of these schools have been included in this consultation process. This comment suggests that an irrational approach has been adopted, specifically to choose between Leopold Schools rather than choose between wider schools in Planning Area 4.

5. Responses to the informal consultation show that 86.7% of respondents disagreed with the proposal to cease provision on the GR site. In addition to this only 8.3% agreed that if the site were to close that this should happen at a fixed point in time. Your proposal to the Cabinet goes completely against the outcome of the informal consultation and is also not based on the concrete data highlighted in your own Review of Primary School Places in the Primary Planning Area 4 document, which demonstrates that the GR site should not be considered for closure above other schools.
6. In addition to this, during a meeting held with Shirley Parks and Michelle Gwyther, on the 2<sup>nd</sup> of February, I was very disheartened that during discussions it appeared that GR has been ringfenced for closure and that a decision has already been made regarding the future of the site, meaning that the formal consultation is being conducted as a formality rather than as part of a decision-making process.
7. The report to Cabinet states that the "proposal is required to address the level of spare places in the local area". In the Review of Primary School Places in Primary Planning Area 4 document, you outline that in 2022/23 the number of spare places available across planning area 4 was 1865. However, this entire consultation process has only considered a PAN of 90 pupils (including the reduction of PAN at Mitchell Brook Primary School). Given the number of spare places available, you have failed to explain how reducing the PAN of local planning area 4 by 90 pupils will help to address this problem. It is apparent that a more strategic and honest approach to place planning is needed. It seems that your preference for the closure of Leopold GR has not been driven by an objective review of the evidence when determining closure, but by expediency. Specifically, that closing the Leopold GR site is easier and politically more palatable than legally closing an official primary school. On many occasions, and also within the report to Cabinet, it has been stated that a "series of reorganisation strategies are currently being deployed including PAN reductions, federation arrangements and a potential amalgamation". We have not been privy to this information and in the spirit of transparency the other reorganisation strategies for Planning Area 4 should have formed part of the consultation process.
8. Having reviewed the results of the informal consultation, the majority of respondents rejected the proposal and also offered plausible alternatives to closing GR, many of which warrant investigation. Additionally, the Leopold Governing Board provided your team with a matrix clearly outlining why the GR

site should not be closed when compared to other schools on key metrics, which appears to have been dismissed and has not been addressed specifically by the local authority.

9. The council has failed to understand that we are two distinct schools, with distinct communities and separate staffing. It is particularly disappointing that sufficient consideration has not been given to the impact that the closure of GR will have on the vulnerable community that the school serves which includes a community with high levels of depreciation and SEND needs.

To conclude, we believe that Brent Council should implement a more coordinated approach when considering how to combat the falling pupil roll and the decision should be based on an objective assessment of the data rather than expediency. Closure of the GR site will not address the falling pupil roll in Planning Area 4 and it penalises a school that has successfully managed the impact of falling rolls and is a viable and flourishing school. Children in Brent deserve a high-quality education and closing a 'good' school will not support Brent in ensuring that all children receive the highest quality of education.

The Leopold Governing Board do not agree with or support the closure of the Gwenneth Rickus site of Leopold Primary School and closing this site is not in the best interest of our community stakeholders.

Kind Regards

**Cynthia Allen**  
**Chair of Governors**  
**Leopold Primary School**

### **Response from the local authority**

The Local Authority acknowledges the high quality of education provided by Leopold Primary School to deliver a good standard of educational provision as judged by Ofsted and is proud that 96.7% of its primary schools are rated Good or Outstanding by Ofsted and, all schools in Planning Area Four other than one school are currently rated as Good or Outstanding by Ofsted.

The Local Authority has explained the decision to propose the closure of the Gwenneth Rickus site was made considering a number of different factors and not made on the basis the least effective school or school with the lowest pupil numbers should be closed. The Local Authority took into account the governing body's analysis during the informal consultation process which raised many of the same points listed above but did not agree with the analysis.

Officers have been clear throughout the consultation process that children currently in Reception, Year 1 and Year 2 and those entering reception in September 2024 would be the years groups affected and those in years 3 to 6 would be able to finish their education at the Gwenneth Rickus site. The local authority's view is even with a 10% reduction in on-roll numbers if parents decide to change their child's school, the Gwenneth Rickus site will remain viable to operate until July 2027.

The Council clearly understands a Cabinet decision to close the Gwenneth Rickus site will be a very difficult decision for the staff, leaders and governing body of Leopold Primary School. Officers from across the Council will support the leadership team and governing body of Leopold Primary School to address issues which will arise as a result of this decision and to help the school to plan to continue to deliver high quality education.

The Local Authority gained a better understanding of the views of parents during the informal consultation process. 61.9% of respondents to the informal consultation indicated that, if the proposal were to go ahead, they would like it to be as a phased closure and this is the proposal which has been put forward to Cabinet.

## Appendix 3

### EQUALITY ANALYSIS (EA)

<b>POLICY/PROPOSAL:</b>	Closure of primary provision on the Gwenneth Rickus site of Leopold Primary School
<b>DEPARTMENT:</b>	Children and Young People
<b>TEAM:</b>	Admissions and School Organisation Team, Forward Planning, Performance and Partnerships Service
<b>LEAD OFFICER:</b>	Michelle Gwyther
<b>DATE:</b>	5 April 2024

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

#### 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.

Leopold Primary School is situated in the south of the borough. The Brent School Place Planning Strategy 2014-18 approved by Cabinet in October 2014, identified an increasing demand for primary school places and the need for additional places across the borough. To help meet this demand, new primary provision was established in 2014 under the management of Leopold Primary School on a separate site known as the Gwenneth Rickus Building. This was located on Brentfield Road 0.5 miles from the main site on Hawkshead Road. The provision was for 420 places in total with 60 in each year group from Reception to Year 6.

Many other schools in the area have also expanded on a permanent basis, thereby increasing the supply of places to meet anticipated demand at the time. Demand for places across London has, however, been decreasing since 2017. Borough-wide projections indicate demand for Reception school places will continue to fall over the next 5 years. Planning Area 4 has the greatest number and percentage of spare places of all the six Primary Planning Areas in Brent. Schools in the area have been managing the impact of falling rolls for several years with the support of the Local Authority to manage the detrimental impacts of falling demand. A series of reorganisation strategies are currently being deployed including Pupil Admission Number (PAN) reductions, federations arrangements and a potential amalgamation.

The proposal to reduce capacity at Leopold Primary School is aimed at ensuring the long-term sustainability of all schools in the area.

The proposal is to close provision on the Leopold Primary School Gwenneth Rickus site by:

- Proposing a variation to reduce Leopold Primary School's Published Admission Number (PAN) from 120 to 60 from September 2025
- Closing the site for educational provision no later than the end of July 2027

Pupils receiving education on the Gwenneth Rickus site and remaining on roll beyond the point of closure will be able to continue to receive their education at the Hawkshead Road site from September 2027. Leopold Primary School will revert back to the status it had in 2013 as a single site primary school with a PAN of 60 and 420 places across Reception to Year 6.



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

Pupils  
 Parents and carers of children who attend Leopold Primary School  
 Residents in the Brentfield Road and Hawkshead Road areas i.e. Roundwood and Stonebridge wards  
 Staff/contractors based at the Gwenneth Rickus site and Hawkshead Road sites of Leopold Primary School  
 Leopold Primary School Governing Board

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

Yes

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

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 equality impacts been identified with this policy or proposal?	<b>x</b>	
<p><b>If you have answered YES to ANY of the above, then proceed to section B.</b>  <b>If you have answered NO to ALL of the above, then proceed straight to section D.</b></p>		

## SECTION B – IMPACTS ANALYSIS

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

The London Borough of Brent School Place Planning Strategy 2024 – 2028 (approved by Cabinet in October 2023) noted the sustained reduction in primary demand and the resulting level of spare places that are impacting on some schools. Planning Area 4 has the greatest number and percentage of spare places of all the six Primary Planning Areas in Brent. Primary Planning Area 4 covers the wards of Roundwood, Stonebridge and Harlesden and Kensal Green has very high levels of surplus places. The latest projections indicate a further reduction in demand in this planning area.

The closure of the Gwenneth Rickus site of Leopold Primary School has been proposed as part of a wider, co-ordinated series of measures which have included informal capping arrangements, Published Admission Number reductions and federations.

Leopold Primary School operates as one school with one leadership team and governing body across two sites. Leopold Primary School is situated on Hawkshead Road within the Roundwood ward. The Gwenneth Rickus site of Leopold Primary School is situated on Brentfield Road within the Stonebridge ward. The Leopold Gwenneth Rickus site was opened in September 2013 in response to increasing demand for primary school places in Brent. The site was previously used by the borough as a school improvement centre running courses for education professionals.

Currently children attending each of Leopold Primary School's two sites receive all of their education exclusively at that site. Each of Leopold Primary School's site can accommodate two forms of entry, but the Gwenneth Rickus site currently operates an informal cap of one form entry in Reception, Year One, Year Two and Year Four. The school achieves good outcomes for pupils across at or above national averages at all key stages and was rated by Ofsted as 'Good' in June 2022.

For the purposes of admissions when applying for a place at Leopold Primary School, parents can make a preference for either the Hawkshead Road site or the Gwenneth Rickus site on Brentfield Road.

The location of the site is such there is sufficient capacity in the area to accommodate current and future demand for places. There are seven other Primary schools located within less than one mile than the Gwenneth Rickus site providing parental choice with the average travel distance of 0.52 miles. There are also seven schools located within one mile of the Hawkshead Road site with 0.57 miles being the average distance to other schools.

Data on pupils at the school suggest that the intake is similar to other schools in terms of ethnic diversity, children on free school meals and children with special needs and disabilities.

This indicates that attending other local schools would not have a negative impact on children that might otherwise attend provision on the Gwenneth Rickus site.

The proportion of children receiving benefits related Free School Meals at the school is 32.8% compared to 33.2% for the whole planning area. Ethnicity and SEND data are below

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

<b>AGE</b>	
<b>Details of impacts identified</b>	<p>If the Gwenneth Rickus site is closed it will affect 4 – 11 year olds who attend that site and who live in the local area as the option to attend provision on the site will no longer be available.</p> <p>The local authority is proposing a phased closure of the Gwenneth Rickus site. This would involve ceasing Reception intakes from September 2025 and moving any children who attend the site in September 2027 to the Hawkshead Road site to complete their education. This means that only children in Reception and Year 1 and Year 2 in academic year 2024/25 would need to move to the Hawkshead Road site when the site closes in summer 2027. The current Year 3 will complete their Year 6 in July 2027 and not be directly affected by the closure.</p> <p>The Local Authority recognises this may mean a longer journey for some children depending on where they live. It is also recognised the closure proposal could have an impact on families who have children currently educated at the Leopold Primary School Gwenneth Rickus site and younger children who have not yet started school, as it would not be possible for them to attend the Leopold Primary School Gwenneth Rickus site from September 2025. Having children attending more than one school could be particularly difficult for large families.</p> <p>Parents can choose to move their children to an alternative school if that is where they would prefer their child to be educated. There are seven other Primary schools located within less than one mile than the Gwenneth Rickus site providing parental choice with the average travel distance of 0.52 miles. There are also seven schools located within one mile of the Hawkshead Road site with 0.57 miles being the average distance to other schools.</p>

<b>DISABILITY</b>	
<b>Details of impacts identified</b>	<p>The Gwenneth Rickus site has restricted accessibility. The site has two floors. The ground floor is fully accessible with wheelchair accessible toilets, but there is no lift to the first floor. If children with disabilities or with SEND attending the site are required to move site or school, the receiving site or school would be required to make any reasonable adjustments that may be necessary. Children with an Education, Health and Care Plan attending the site would have their plans reviewed to ensure they continue to get the right support.</p> <p>The proportion of children at Leopold Primary School with an EHCP is 1.5% compared to 3.7% across the whole planning area. The proportion of children at Leopold Primary School receiving SEN Support is 9.2% compared to 18.1% across the whole planning area. (Data taken from the October 2023 School Census)</p>
<b>RACE</b>	
<b>Details of impacts identified</b>	<p>Pupils at the Leopold Primary School represent the diversity of Brent. Other schools in the primary planning area also have diverse intakes and it is not considered that attending an alternative site or school would have a negative impact on the basis of race.</p> <p>The top three ethnic groups attending Leopold Primary School match the top three ethnic groups across Primary Planning Area 4, although the proportion of each group is higher in Leopold Primary School. (Data taken from the ethnicity section of the January 2023 School Census)</p>
<b>SEX</b>	
<b>Details of impacts identified</b>	N/A
<b>SEXUAL ORIENTATION</b>	
<b>Details of impacts identified</b>	N/A
<b>PREGANCY AND MATERNITY</b>	
<b>Details of impacts identified</b>	N/A
<b>RELIGION OR BELIEF</b>	
<b>Details of impacts identified</b>	Leopold Primary School is non-denominational. There are seven other schools in the local planning area which are non-denominational.
<b>GENDER REASSIGNMENT</b>	
<b>Details of impacts identified</b>	N/A
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>	

<b>Details of impacts identified</b>	N/A
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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?

Informal consultation with stakeholders was carried out between 1 November 2023 and 13 December 2023. 174 responses were received, and approximately 100 members of the public attended consultation meetings, with separate meetings held for both staff and governors.

Formal statutory consultation was carried out between 29 February 2024 and 28 March 2024 and provided stakeholders an opportunity to comment on defined proposals. One submission was received from the chair of the governing body on behalf of the governing body

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

N/A

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

If a decision is taken to close the site, the proposals would be implemented from September 2025 through the reduction in the Pupil Admission Number and changes to the reception intake at the Gwenneth Rickus site. This will allow time to plan in order to minimise the impacts on children, their families and carers and staff at the school. Any children remaining on roll at the site at the point of closure will have the opportunity to transfer to the Hawkshead Road site of the school. If parents wish the child to change to a different school, they can seek advice and guidance through the in-year admissions process.

If the proposal to close the site is taken forward, officers from across the Council will support the leadership team and governing body of Leopold Primary School to address any issues as they arise as a result of this decision. An implementation plan will be developed to help the school to continue to deliver high quality education.

The current plan to phase the closure of the site aims to ensure that all children attending the site can complete their current Key Stage on the site to minimise disruption to families.



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

The proposals have already gone through informal consultation and responses reviewed. The final decision whether to close the Gwenneth Rickus site of Leopold Primary School will be made by Brent Cabinet after reviewing the responses to both the informal and formal consultations.

If the closure proposal proceeds, the Local Authority and the school would work together to manage the implementation of the proposal in the least disruptive way.

**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.

Based on current data analysis and information, officers are of the view it is appropriate to proceed with the proposal to close the Gwenneth Rickus site of Leopold Primary School

**SECTION D – RESULT**

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

**SECTION E - ACTION PLAN**

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

<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>
Review concerns and issues raised during formal consultation	Inform the final proposal	Michael Rollin Michelle Gwyther	May 2024

Working with the school leadership team and governing board to develop a clear implementation plan	To mitigate negative impacts	Michael Rollin with support from other services	July 2024
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**SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Michael Rollin
<b>REVIEWING OFFICER:</b>	Michelle Gwyther
<b>HEAD OF SERVICE:</b>	Michelle Gwyther
<b>DATE:</b>	05/04/2024