



Brent

Cabinet

Monday 19 May 2025 at 10.00 am

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

Please note this will be held as a physical meeting which all Cabinet members will be required to attend in person.

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

Membership:

Lead Member Councillors:

Portfolio

M Butt (Chair)	Leader of the Council
M Patel (Vice-Chair)	Deputy Leader and Cabinet Member for Finance & Resources
Benea	Cabinet Member for Regeneration, Planning & Property
Donnelly-Jackson	Cabinet Member for Housing and Residents Services
Farah	Cabinet Member for Safer Communities, Jobs and Skills
Grahl	Cabinet Member for Children, Young People & Schools
Nerva	Cabinet Member for Adult Social Care, Public Health and Leisure
Rubin	Cabinet Member for Climate Action and Community Power
Krupa Sheth	Cabinet Member for Public Realm & Enforcement

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

For electronic copies of minutes and agendas please visit:
[Council meetings and decision making | Brent Council](#)

Notes for Members - Declarations of Interest:

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

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

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

***Disclosable Pecuniary Interests:**

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

****Personal Interests:**

The business relates to or affects:

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

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

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

or

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

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

Agenda

Introductions, if appropriate.

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

3	Minutes of the Previous Meeting	
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To approve the minutes of the previous meeting held on Monday 7 April 2025 as a correct record.	1 - 18
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(Agenda republished to include the attached minutes on 16 May 2025)

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

5	Petitions (if any)	
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To receive and consider any petitions for which notice has been provided under Standing Order 66.

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

- (a) Use of Liddell Gardens and Doyle Gardens as a shortcut by Metroline buses between Kensal Rise & Willesden Junction bus garage.

6	Reference of item considered by Scrutiny Committees (if any)	
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To consider any reports referred by either the Community Wellbeing or Resources & Public Realm Scrutiny Committees.

Children, Young People & Community Development reports	
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7	The Future of Islamia Primary School	19 - 30
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This report sets out proposals on the relocation of Islamia Primary School to the Gwenneth Rickus site as a 2 Form Entry school, subject to

statutory consultation, from September 2027.

Ward Affected:

Queens Park,
Preston &
Stonebridge

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

Contact Officer: Shirley Parks, Director -
Education Partnerships and Strategy

Tel: 020 8937 4529

Shirley.Parks@brent.gov.uk

Neighbourhood & Regeneration reports

8 **Brent Local Implementation Plan (LIP) Three-Year Delivery Plan: 2025/26 - 2027/28** 31 - 66

This report provides an update on Local Implementation Plan (LIP) funding arrangements for the three-year period 2025/26 – 2027/28 along with details on the programme of transport schemes and measures approved by Transport for London (TfL) to be implemented by the Council up to 31 March 2028.

Ward Affected:

All Wards

Lead Member: Cabinet Member for Public
Realm & Enforcement (Councillor Krupa Sheth)

Contact Officer: Tim Martin, Transportation
Planning Manager, Spatial Planning
020 8937 6134

Tim.Martin@brent.gov.uk

9 **Allocation and Monitoring of Strategic Community Infrastructure Levy** 67 - 80

This report outlines a series of proposals for updating the governance strategy for the allocation and forward planning of the Strategic Community Infrastructure Levy (SCIL). Key measures proposed include updating the Council's infrastructure delivery plan (which sets out the infrastructure needed to support development), streamlining delegated authority and approval processes, introducing prioritisation criteria, improving project monitoring and management, and enhancing SCIL allocation planning. The proposals also cover procedures for "Infrastructure Payments" and "Payments in Kind."

Ward Affected:

All, excluding
parts of
Alperton,
Harlesden &
Kensal Green,
Stonebridge
and Tokyngton
where the Old
Oak and Park

Lead Member: Cabinet Member for
Regeneration, Planning & Property (Councillor
Teo Benea)

Contact Officer: David Glover, Head of
Planning and Development Services

Tel: 020 89375344

david.glover@brent.gov.uk

Royal
Development
Corporation
(OPDC) is the
Local Planning
Authority

10 Alperton Station Step Free Access Funding Request

81 - 88

This report updates on proposals for step free and other access improvements at Alperton underground station, including details of a concept design produced by Transport for London (TfL), and seeks agreement for the Council to contribute up to 50% of the costs (capped at £5 million) through the Strategic Community Infrastructure Levy (SCIL) towards the cost of delivering these improvements.

Ward Affected:
Alperton

Lead Member: Cabinet Member for
Regeneration, Planning & Property (Councillor
Teo Benea)

Contact Officer: Tim Martin, Transportation
Planning Manager, Spatial Planning
Tel: 020 8937 6134
tim.martin@brent.gov.uk

11 Kilburn Neighbourhood Plan – Publication Consultation and Next Stages

89 - 152

This report provides an overview of the process which Kilburn Neighbourhood Plan Forum has followed in producing the draft Kilburn Neighbourhood Plan and a summary of its content. It sets out the next stages that the Plan will have to go through to become part of the development plan and seeks authority from Cabinet to undertake these actions.

Ward Affected:
Brondesbury
Park; Kilburn;
Queens Park

Lead Member: Cabinet Member for
Regeneration, Planning & Property (Councillor
Teo Benea)

Contact Officer: Paul Lewin, Spatial and
Transportation Planning Manager, Spatial
Planning
Tel: 020 8937 6710
paul.lewin@brent.gov.uk

12 Draft Brent Tree Strategy

153 - 210

This report seeks approval for public consultation on the Draft Brent Tree Strategy document.

Ward Affected:

Lead Member: Cabinet Member for Public

All Wards

Realm & Enforcement (Councillor Krupa Sheth)
Contact Officer: John Stiles, Placemaking
Manager
Tel:020 8937 3568
John.Stiles@brent.gov.uk

Resident & Housing Services reports

13 Sale of a converted dwelling house at 1a-1d Greenhill Park to First Wave Housing. 211 - 216

This report seeks approval to the proposed sale by the Council of a converted dwelling house at 1a-1d Greenhill Park, Harlesden, NW10 9AE (the "Property") to First Wave Housing Ltd which is part of the Council's Housing Revenue Account housing stock and is now vacated.

Ward Affected:
Harlesden &
Kensal Green

Lead Member: Cabinet Member for Housing &
Resident Services (Councillor Fleur Donnelly-
Jackson)
Contact Officer: Spencer Randolph, Director
Housing Services
020 8937 2546
Spencer.Randolph@brent.gov.uk

14 Exclusion of Press and Public

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

Agenda Item 7: Future of Islamia Primary School - Appendix 1
(Additional legal considerations)

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

15 Any other urgent business

Notice of items to be raised under this heading must be given in writing to the Deputy Director Democratic and Corporate Governance or their representative before the meeting in accordance with Standing Order 60.

Date of the next meeting: Monday 16 June 2025



- Please remember to set your mobile phone to silent during the meeting.
- The meeting room is accessible by lift and seats will be provided for members of the public. Alternatively, it will be possible to follow

proceedings via the live webcast [HERE](#)

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LONDON BOROUGH OF BRENT

MINUTES OF THE CABINET

Held in the Conference Hall, Brent Civic Centre on Monday 7 April 2025 at
10.00 am

PRESENT: Councillor M Butt (Chair), Councillor M Patel (Vice-Chair) and Councillors Benea, Councillor Fleur Donnelly-Jackson, Farah, Nerva and Rubin.

Also present: Councillors Conneely for items 5, 8 and 9.

1. **Apologies for Absence**

Apologies for absence were received from Councillor Grahl (Cabinet Member for Children, Young People & Schools) and Councillor Krupa Sheth (Cabinet Member for Public Realm & Enforcement) along with Alice Lester (Corporate Director Neighbourhoods & Regeneration) with Gerry Ansell (Director Inclusive Regeneration & Climate Action) attending as her representative.

No other apologies for absence were received at the meeting.

2. **Declarations of Interest**

No declarations of interest were made during the meeting.

3. **Minutes of the Previous Meeting**

Cabinet **RESOLVED** that that the minutes of the previous meeting held on Monday 10 March 2025 be approved as a correct record of the meeting.

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

None identified.

5. **Petitions (if any)**

5.1 Management of fire safety risks and future provision of Lynton Close Travellers site

Councillor Muhammed Butt (as Leader of the Council) welcomed Elisabeth Corcoran (as a local resident and representative of Lynton Close Travellers Site), who was supported by Nancy Hawker (London Gypsies and Travellers Association), to the meeting who he advised were attending to present a letter and petition relating to management of fire safety risks and the future provision of Lynton Close Travellers site.

In thanking the Leader of the Council for the opportunity to present the petition, Elisabeth Corcoran called on the Council to pause any eviction proceedings at the

site, install fire risk mitigations in collaboration with the residents of Lynton Close and find alternative land that could be used as a temporary site in the case of a humanitarian emergency which could be used, if required, until more permanent, adequate and suitable accommodation could be arranged. Whilst acknowledging the issues highlighted within the accompanying Cabinet Report (*Agenda Item 8: Housing Management – Building Safety Update, New Building Safety Policy and Update on Fire Safety at Lynton Close*) in relation to overcrowding and fire safety risks associated with the site, it was pointed out that residents on the site had previously raised concerns with the Council on the same issues. Despite assurances that every effort was being made to secure another more suitable alternative site it was pointed out this had not yet been achieved.

In representing the views of residents on the site, reference was also made to Brent's Equity, Diversity and Inclusion (EDI) Strategy which it was pointed out included the ambition for Brent to become a borough of all cultures where all backgrounds were represented, celebrated and felt that they belonged. This was not, Elisabeth Corcoran advised, an approach that currently resonated with Brent's Traveller Community given the way in which other communities were felt to be treated when compared to the approach adopted in seeking to address the safety issues at Lynton Close (as the only traveller site in the borough) which had made the traveller community on the site feel like they did not belong or that their culture was respected.

As a further example, reference was made to the comments in the accompanying Cabinet report, which it was highlighted had described the residents of Lynton Close as 'unwilling', 'disruptive' and 'demanding' when detailing their interactions with Council officers. It was felt this continued to feed a narrative of negativity in relation to the traveller community located on the site, with the resident engagement process outlined also not felt to have been presented accurately.

Concerns were also expressed regarding the negative impact any potential displacement of families from the site would have on education provision for their children, including those with additional needs or SEND who had long awaited assessments and support plans in place. It was felt the momentum and trust built in terms of engagement with the education system would therefore be placed at significant risk by any displacement.

As further concerns, reference was made to the health and wellbeing of the traveller community with specific issues highlighted in relation to mental health and suicide having also directly affected the community at Lynton Close. Concern was expressed these were likely to be exacerbated should the community be forced in to brick-and-mortar accommodation resulting in increased anxiety as a result of the lifestyle change, concerns around isolation and the impact in being able to preserve their way of life and heritage. Whilst willing to consider alternative locations, it was felt further consideration needed to be given to the true impact moving residents into brick-and-mortar accommodation would have on the community's mental wellbeing, cultural identity and values.

In seeking a way forward, Elisabeth Corcoran advised that residents at Lynton Close had recognised the need to work with the Council to improve communication and had also advised they would be willing to consider the introduction of a Waking Watch following what was felt to have been limited initial engagement in seeking to

address safety concerns relating to operation of the scheme. These had included safeguarding concerns around the use of cameras in the vicinity of children on the site as well as use of the children's play area to facilitate the schemes implementation, which was also highlighted as a potential issue under the Decent Homes Standard. It was also pointed out that an apology had been issued by resident representatives for a previous incident related to the attempts made to establish a previous version of the scheme on site.

In summing up, Elisabeth Corcoran hoped the Council would seek to engage with the traveller Community at Lynton Close in order to find a solution that would respect their culture and heritage whilst also seeking to address the safety issues and risks highlighted, which it was hoped could be achieved through a process of collaboration and understanding. Recognising the various needs that would need to be addressed should displacement take place, including those of the elderly, vulnerable and children with special educational needs, as well as the impact the disruption would cause to residents physical and mental wellbeing, a request was once again made to pause any eviction proceedings and work in collaboration with residents in seeking to install the necessary fire mitigation measures. At the same time, the importance was highlighted in the Council seeking to continue its effort to find alternative land that could be used as a temporary site in the case of a humanitarian emergency and which could be used, if required, until more permanent, adequate and suitable accommodation was secured.

In response, Councillor Fleur Donnelly-Jackson (as Cabinet Member for Housing & Residents Services) thanked Elisabeth Corcoran and the other site representatives present for attending Cabinet in order to ensure the views of residents at Lynton Close were represented, whom it was assured remained valued members of the community in Brent. In outlining the Council's commitment to a more sustainable future for travellers in the borough, the opportunity was taken to highlight the efforts being made to identify alternative sites that would meet their needs whilst also seeking to address the safety concerns highlighted and improve the Lynton Close site. In acknowledging the specific issues highlighted during presentation of the petition it was pointed out that many of these had already been raised with officers in terms of the approach identified moving forward.

At the same time in responding to the petition, Councillor Donnelly-Jackson felt it important to recognise that the Lynton Close Travellers Site was dangerously overcrowded which, when combined with other factors (including breaches in site licensing agreements) had presented an intolerable risk to life, given the severe fire and associated safety risks to those living on the site along with the pressure placed on the site's broader infrastructure. In detailing the Council's responsibilities as a landlord in response to these risks, she explained these had placed not only a legal but also moral duty on the Council to ensure the site was safe, highlighting that it would be a dereliction of duty to do nothing.

In outlining the previous unsuccessful attempts made to address safety issues on the site, Councillor Donnelly-Jackson highlighted that the approach now being taken to serve notice on the pitch holders had been designed to provide 28 days to resolve any breaches of licence identified with confirmation provided these were not eviction notices. Whilst recognising that the efforts required to address overcrowding, as a result of the notices served, may involve the displacement of some residents including extended family members, an assurance was provided

that dedicated support would be available to assist those residents in arranging temporary accommodation and in applying to join the waiting list for new pitches as they became available.

The concerns raised in relation to protecting the traveller communities heritage and traditional lifestyle were also recognised along with the need to ensure fair and equal treatment, with the efforts being made as a result to identify alternative sites reiterated. Whilst this work was ongoing it was, however, pointed out that the Council's immediate priority was to the safety of residents on the Lynton Close site with the next best option secured being safe, secure, settled and affordable accommodation, much of which would be grouped to allow larger families to remain in proximity.

In terms of next steps, Councillor Donnelly-Jackson confirmed that further details would be provided at a community information meeting for site residents which had been scheduled with an external specialist agency having also been appointed to assist with the search for alternative sites. The site representatives were also thanked for their cooperation and willingness to engage in further work around the implementation of a Waking Watch, which the Council had agreed in principle subject to working through the logistics and operational requirements relating to its implementation.

In bringing the item to close, Councillor Muhammed Butt (as Leader of the Council) also took the opportunity to assure the residents of Lynton Close of the Council's willingness to continue working with them to mitigate the issues and safety concerns which had been identified, with work also ongoing to find an appropriate alternative site that would work for the community and their requirements. He also thanked residents for their cooperation in seeking to progress implementation of a Waking Watch scheme to mitigate fire risks on the site. In response to the comments raised regarding equity, diversity and inclusion, Councillor Butt assured those present that the traveller community was not regarded any differently from others in the borough and would be afforded the same rights, recognising the legally protected characteristic that the Council had a duty to consider. He concluded his remarks by reminding residents of the community meeting which had been scheduled and would provide a further opportunity to hear from and respond to residents and outline the measures to mitigate the safety issues associated with the site whilst supporting the community and ended by once again thanking the representatives for taking the time to attend the meeting and ensure the views of the traveller community at Lynton Close were represented.

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

There were no items referred from either the Community Wellbeing or Resources & Public Realm Scrutiny Committees.

7. Change in Order of Business

Councillor Muhammed Butt advised that following on from presentation of the petition regarding the Lynton Close Travellers site he had agreed to a change in the order of business listed on the agenda, with Agenda Item 8 (Housing Management – Building Safety Update, new Building Safety Policy and Update on fire Safety at Lynton Close) to be considered as the next item of business.

As he had also accepted a number of requests to speak in relation to Agenda Item 13 (Outcome of Informal Consultation on Amalgamation of Malorees Infant School and Malorees Junior School) members were advised this would be considered as the next item of business following on from Agenda Item 8 .

The minutes therefore reflect the order in which these items were considered at the meeting.

8. Housing Management - Building safety update, new Building Safety Policy and update on fire safety at Lynton Close

Councillor Donnelly-Jackson (as Cabinet Member for Housing & Resident Services) was then invited to introduce a report from the Corporate Director Residents and Housing Services providing an update on all compliance and building safety streams in housing management and property services and also presenting a newly drafted Building Safety Policy for the Housing Management Service as well as an update on fire safety at the Council owned Lynton Close Travellers site.

In presenting the report, Councillor Donnelly-Jackson advised members of its intended purpose to cover three areas. Firstly, it provided an update on all compliance and building safety streams within housing services. Secondly it presented a newly drafted Building Safety Policy and thirdly it provided an update on fire safety at the council-owned traveller site, Lynton Close. As further context, members were advised that following the Grenfell Tower tragedy in 2017, the government had commissioned an independent review of building regulations and fire safety management, which had led to the development and implementation of the Building Safety Act 2022 along with various secondary legislation, including the Fire Safety Regulations 2022. As a result, the Council's Housing Management Service had been working to implement the additional legislative requirements, including the introduction of a new approach towards engaging residents living in the Council's high-risk blocks, around building safety and resulting in the Building Safety Engagement Strategy being approved by Cabinet alongside the wider Tenant and Leaseholder Engagement Strategy in June 2024.

Members were advised that following this, a range of meetings had been held with residents living in high-risk blocks to inform them of the compliance and building safety work being undertaken and provide an opportunity to raise any concerns and issues with housing management staff with these meetings now continuing for a second year. This had also been accompanied by the implementation of a new Housing Management IT system (True Compliance) to improve the logging and monitoring of compliance streams and outstanding actions from compliance inspections. In terms of fire safety and fire risk assessment (FRA) compliance, members were advised (as detailed within section 5.2 of the report) that performance in relation to completion of FRAs across the 1134 residential blocks (including high-rise and converted street properties) was 98.69% with (in the interests of transparency) 819 individual actions currently identified as overdue in 205 blocks and property management currently undertaking an audit of closed down actions in order to ensure they were being closed with the appropriate evidence.

Moving on to then focus on the Gypsy and Traveller's site at Lynton Close, Councillor Donnelly-Jackson outlined the brief history of the site (which members were advised had been detailed within section 6 of the report) along with the specific and serious safety concerns that had been identified in relation to overcrowding and the associated fire safety risks identified, with the site having been deemed an 'Intolerable Risk' following an FRA carried out in August 2024. As a result, the Council had identified a number of safety measures and steps required to eliminate the immediate risk to life. Whilst these actions had been designed to ensure no harm came to the residents living on the site and assurance was also provided about the Council's commitment to creating a truly sustainable future for travellers living in Brent and in reiterating her initial response to the petition presented at the meeting by residents from the site, Councillor Donnelly-Jackson ended by advising of the Council's aim to ensure Lynton Close offered a place where the community had a safe, secure and decent home into the future.

In considering the report, Cabinet noted the Council's legal and also moral duty as landlord to ensure the Lynton Close site was safe, with clarification provided that the notices served had not been eviction notices but were designed to provide those residents with licences who rented the pitches time to address the fire risks identified. Members also noted and endorsed the commitment identified by the Leader of the Council in response to the petition which had been presented by the site representatives, to continue working with them to mitigate the issues and safety concerns identified alongside the work continuing in an effort to find an appropriate alternative site and temporary accommodation (as needed) that would work for the community and their requirements.

In support of the approach outlined in relation to the Council's approach towards building safety compliance as a means of addressing residents safety and security Cabinet therefore **RESOLVED**:

- (1) To note the performance update against each key compliance stream, as detailed in the report.
- (2) To note, having also considered the issues raised following presentation of the petition on the same issue under Agenda Item 5, the update on fire safety at Lynton Close, as detailed in the report.
- (3) To endorse the Building Safety Policy set out in Appendix 1 of the report.

9. Outcome of Informal Consultation on Amalgamation of Malorees Infant School and Malorees Junior School

Prior to considering the report, Councillor Muhammed Butt (as Leader of the Council) welcomed Patrick Martin (NEU representative), Michael Cleary (staff representative) and Aidan Reilly (local parent representative) to the meeting who he advised had requested to speak in relation to the proposed amalgamation of Malorees Infant & Junior School.

In opening the contributions, Patrick Martin, advised that whilst addressing Cabinet on behalf of members from the National Education Union from both schools (the majority of whom were opposed to the amalgamation proposal) he was also a specialist teacher working across both schools. In terms of concerns highlighted

these included what was felt to be the lack of perceived benefit to the school community arising from the amalgamation given the school was already operating as a Federation with a single Governing Body and senior leadership team along with uncertainty over the progress and viability of the DfE refurbishment/rebuild proposals, which were still to be confirmed and potential financial impact on the funding available to the school moving forward, with it estimated that the proposal may cost the school up to £186k annually representing a 5% cut in funding. Whilst supporting the need for refurbishment of the school it was felt the impact any additional cut in funding would have on the learning and care being provided for pupils at the school, particularly the most vulnerable, also needed to be recognised with the school already in deficit and a majority of NEU members therefore opposed to the proposals.

In support of the concerns expressed, Michael Cleary (representing staff from both schools) advised of the impact which the delay in the new build/refurbishment scheme still to be progressed under the DfE fast track scheme had created in terms of an NCIL funding bid for a multi-use games area submitted by the Junior school being lost. Whilst acknowledging that concerns relating to a potential land sale had been eased following discussions with the Council, it was pointed out that staff still remained uncertain given the process being undertaken to change the status of land owned by another local foundation school in Kilburn Park from educational to non-educational use and the increasingly uncertain and challenging context relating to the viability of any future rebuild or refurbishment scheme being delivered given the economic situation and resulting building delays and increased costs. In view of the financial impact on the school Mr Cleary ended his comments by once again highlighting the extent of opposition from staff and the wider school community towards the amalgamation proposal, which he hoped would be recognised in the final decision made.

As a further and final contribution, Aidan Reilly (local parent representative) was then invited to address the meeting who advised he was also speaking in opposition to the amalgamation proposal with the following concerns raised. Firstly, it was felt that any decision made to progress to formal consultation would contradict the outcome of the initial consultation on the basis that 81.7% of those who had responded had indicated they did not support the proposed amalgamation. Although not referred to in the report, advised this had also been supported by a petition containing 260 verified signatures. Reference was also made to the initial consultation proposal being clear that should any of the consultation processes indicate there was not agreement to the amalgamation proposal, or Cabinet decided not to accept any recommendation to amalgamate, the schools would continue as separate infant and junior entities with the Council therefore requested to stand by these terms, as outlined. In addition, he advised significant concerns remained in relation to the financial considerations outlined as part of the initial consultation proposals based on the subsequent amendments identified in relation to the reduced level of pupil funding and other figures such as level of maintenance savings. These concerns were also supported by what Mr Reilly felt to be a lack of evidence, relating to the impact new school buildings had in supporting increased enrolment with, he felt, the key driver in this respect remaining school leadership, staff, and culture as opposed to buildings. Given the further projected decline in demand for school places and pupil numbers across London, including Brent, he therefore felt the enrolment optimism and associated funding outlined in support of the proposal was misplaced. With concerns also raised and being pursued

separately in relation to school governance arrangements Aiden Reilly felt that the proposals, as presented to Cabinet, had failed to meet the standards of fairness, transparency, and integrity expected and should therefore be rejected recognising the strength of opinion also expressed by the wider school community.

In thanking Patrick Martin, Michael Cleary and Aidan Reilly for their comments and acknowledging the issues raised, Councillor Muhammed Butt then moved on to formally introduce the report from the Corporate Director Children, Young People & Community Development on behalf of Councillor Grahl, who had needed to submit apologies for absence at the meeting. In introducing the report, members were advised that it provided a summary of the informal consultation process undertaken on the proposal to amalgamate Malorees Infant and Junior Schools as one Primary School and sought approval to move to formal consultation on the closure of Malorees Junior School, expansion of the age range at Malorees Infant School and a change in name to Malorees Primary School in order to achieve the amalgamation. Although unable to attend the meeting, Councillor Butt advised that Councillor Grahl had provided a statement (in her role as Cabinet Member for Children, Young People and Schools) on the proposals presented for consideration which he had been asked to present on her behalf.

Referring to the statement, he advised that Councillor Grahl had apologised to all present for not being able to attend the meeting and also thanked Patrick Martin, Michael Cleary and Aidan Reilly for the representations made and their engagement and continued scrutiny of the proposals, with Councillor Grahl advising that she would be more than willing to meet with NEU representatives should they have any further discussion points related to the proposals.

In terms of the proposals themselves, the Leader advised that Councillor Grahl had been keen to outline what were felt to be the considerable advantages to the school community, including the prospect of accessing DfE funding to carry out long overdue infrastructure investment, that would essentially lead to the rebuilding of both schools recognising how valuable an opportunity this represented in the current economic climate given the struggles faced by many schools in maintaining their buildings and limited progress made by the previous Conservative Government in delivery of their School Rebuilding Programme. She also felt it important to recognise that the merging of smaller schools had become a common strategy to provide financial resilience through the sharing of resources and staffing and in seeking to make them less vulnerable to declining pupil roll numbers, which had already been recognised as a risk in Brent and across London more widely.

The Leader advised that Councillor Grahl had also highlighted the complexities in terms of the role of local authorities in decision-making with regards to schools and had wanted to emphasise that the proposal itself had come directly from the school governing board, who had considerable autonomy in the day to day running of the school, as well as decisions surrounding funding and staff recruitment. The role of Cabinet would therefore be to consider the request on its merits and ratify the decision should it be considered in the school's interests. Whilst recognising that the proposals had met with opposition and anxiety by some NEU members and parents at Malorees School he advised that Councillor Grahl had wanted him to provide the following reassurances:

- That the amalgamation would not involve any proposed redundancies or changes in the terms and conditions of Malorees staff.
- There would be no risk of academisation as a result of the merger with support expressed for retaining Malorees as a community school.
- Whilst a small funding cut had been identified in the report, this had resulted from changes to the National Funding Formula set by the DfE with the governing board together with Brent Council having already outlined how that would be offset by savings elsewhere.

As a result, the Leader advised that Councillor Grahl had confirmed her support for the proposal amalgamation and move towards a formal consultation, highlighting what she felt would be the transformative nature of access to the funding for the rebuilding of the school that would be provided as a result, not only for pupils but also in supporting the school being able to attract a new cohort of children, which the Council continued to recognise as an important community asset in Brondesbury Park. In ending her statement, Councillor Grahl also took the opportunity to thank the school for overseeing the consultation as well as officers for their role in liaising with the school and the NEU.

Moving on to consider the report, members sought further clarification from officers regarding the concerns relating the reduction in funding identified, which Shirley Parks (Director Education, Partnerships and Strategy) confirmed related to changes in the DfE National Schools Funding Formula and had been based (in terms of maintenance) on the delivery of a new school building. In terms of the impact of wider changes in the local area it was felt the situation regarding Islamia Primary School and the attraction of a new building would have the potential to attract more pupils with members advised that the schools were now in the active DfE rebuilding programme for consideration between April and December 2025. In terms of the concerns raised regarding the lack of perceived benefit to the school community arising from the amalgamation, given the school was already operating as a Federation with a single Governing Body and senior leadership team, members were advised of the additional benefits arising in relation to the admissions criteria (removing the need for pupils currently at the Infant School to have to apply for a place at the Junior School) and Ofsted inspection framework. In relation to concerns regarding governance arrangements at the school, confirmation was provided these were subject to review with the Council's School Effectiveness Service continuing to work with the governing board to offer support in seeking to strengthening any arrangements, where needed. Confirmation was also provided that the Governing Body remained confident it could manage the funding reduction over a period without impact on staff with the amalgamation also helping the new school to build one community. Assurance was also provided regarding future use of the Junior School site (should it end up being transferred by the Foundation) with clarification provided that the situation at Kilburn Park, also a Foundation School, had been different as the redesignation of that land for non-education purposes was linked to wider delivery of the South Kilburn regeneration scheme.

Having considered the clarification provided, Councillor Muhammed Butt in summing up and seeking to provide a final response on the concerns raised took the opportunity to once again assure the school staff and parent community that the approach being recommended did not include any proposed redundancies or

changes in the terms and conditions of school staff; would retain Malorees as a community school and not lead to the risk of academisation and had been designed to secure access to DfE funding that would provide long overdue and transformative infrastructure investment for the rebuilding of both school buildings recognising the school as an important community asset. In clarifying the funding reduction outlined in the report, it was pointed out this reflected the move towards the National Funding Formula, set by the DfE, with the Governing Body together with Council commitment to securing the schools financial resilience and confident of the plans in place to manage the funding reduction without an impact on staff, Confirmation was also provided that the issues raised within the supporting petition referred to at the meeting had been reviewed and addressed within the report.

On the basis of the clarification provided at the meeting and in recognising the offer extended by the Cabinet Member for Children, Young People and Schools to meet with NEU representatives in order to continue discussions around the proposals moving forward Cabinet **RESOLVED** to approve a period of formal consultation, through publication of a statutory notice, on proposals to:

- (1) Close Malorees Junior School;
- (2) Expand the age range of Malorees Infant School to admit children aged between 3 – 11; and
- (3) Change the name of Malorees Infant School to Malorees Primary School.

10. **LGA Corporate Peer Challenge - Feedback Report and Action Plan**

Councillor Muhammed Butt (as Leader of the Council) introduced a report from the Chief Executive detailing the outcome of the Local Government Association (LGA) Corporate Peer Challenge undertaken in Brent during January 2025 along with the key recommendations and Action Plan produced in response.

In presenting the report, Cabinet were advised of the comprehensive nature of the evaluation, which had been conducted independently by the LGA and as well as identifying key areas of success and strength had also identified a number of crucial areas for continued improvement. In terms of key highlights, members were advised that Brent had been identified as a well-performing authority with a positive organisational culture and commendable track record in delivering essential services with notable achievements including significant progress in housing development, particularly in Wembley Park and Grand Union. Political stability was also recognised to have fostered effective collaboration between senior management and council members with the moved towards a Radical Place Leadership approach also identified as supporting the aim to enhance public service delivery through strengthened partnerships and integrated service models.

In also seeking to confront the challenges identified, members were advised that the key areas for improvement had included the need to address internal silo working to encourage strategic collaboration across departments. Reference had also been made to the urgent focus required to tackle the temporary accommodation crisis, given the significant financial strain this was creating as well as a focus on addressing the ongoing challenges in relation to financial management and resilience relating to the depletion of reserves, which had

necessitated a robust financial recovery and sustainability plan. As a further issue performance in social housing management had also been identified as below expectations, prompting new initiatives like the Housing Management Service Improvement Plan.

In acknowledging the significance of the challenges identified it was recognised that many of the issues highlighted were also shared by councils across London with a detailed Action Plan having been developed, which members were advised had been produced to provide a clear strategic approach and roadmap towards addressing the areas for improvement outlined.

Kim Wright (as Chief Executive) was also invited to comment on the report who highlighted the Corporate Peer Review (CPC) challenge as a robust and effective improvement and assurance process which demonstrated an open and transparent approach towards external review by the Council as an organisation. The Action Plan developed in response to the review recommendations (included as Appendix B to the report) had been developed by the Corporate Management Team (CMT) and senior management alongside the Change Champion cohort and detailed the range of activity being developed and implemented in response to the CPC feedback. Whilst owned by CMT and senior managers members were advised that all staff would be involved in delivery of the Action Plan.

In considering the report, members welcomed the challenge process undertaken which was felt to have provided a fair and comprehensive evaluation of the Council's strengths as well as areas for improvement. Noting the focus on the challenges faced in relation to housing, reference was made to the work already underway and key milestones identified within the Action Plan in relation to addressing the pressures around temporary accommodation, including development of a Temporary Accommodation Improvement Plan, alongside a refresh of the Council's approach towards Tenant engagement supported through the new Housing Management Advisory Board and work also being undertaken to review and update the Council's Housing Allocations Policy. As a further addition in relation to the Action Plan, members were advised of an additional milestone included in relation to the work being undertaken to establish a strategic culture approach supporting development of a shared vision for Brent, involving the Culture Service having engaged a specialist consultant to map the existing assets of Brent's cultural and creative landscape in order to better understand Brent's existing creative and visitor economy and inform future strategic planning. Members also noted the work being undertaken to address the recommendations made in relation to the refresh of the Council's EDI priorities as well as the Council's financial sustainability focussed around the refreshed Medium Term Financial Strategy and budget setting process for 2026/27 – 2028/29.

In thanking all officers involved for their support in the CPC process and opportunity provided to reaffirm the Council's resolve, resourcefulness, and responsiveness in addressing the significant challenges identified, Cabinet **RESOLVED**:

- (1) To note the Corporate Peer Challenge feedback report from the LGA, attached as Appendix A to the report.
- (2) To approve the Corporate Peer Challenge Action Plan, attached as Appendix B to the report which it was noted would include the following as an additional

milestone in relation to Recommendation 8. Shared Vision for the Future of Brent:

Milestone 3: establish a strategic culture approach

Brent Culture Service has engaged a specialist consultant to map the existing assets of Brent's cultural and creative landscape in order to better understand Brent's existing and potential audiences and identify baseline data sets. This would help to then understand Brent's creative and visitor economy and inform the future strategic planning.

11. Community Led Housing in Brent - Extension to Brentfield Road site agreement

Councillor Benea (as Cabinet Member for Regeneration, Planning & Property) introduced a report from the Corporate Director Resident & Housing Services providing an update on the progress made by Brent Community Land Trust (BCLT) towards establishing a Community Led Housing (CLH) scheme utilising a site at Brentfield Road and outlining the next steps in the process.

In presenting the report, Cabinet were reminded of the background to the scheme and decision which had been taken in May 2023 to ring fence the site at Brentfield Road for provision of a Community Led Housing (CLH) for a 12-month period. Following that decision members were advised that Brent Community Land Trust (BCLT) had been working towards meeting the initial criteria set out in section 3.2.3 of the report which, to date, had included developing the scheme to concept design and pre application stage, selecting a Registered Provider, pending final agreement, to act as developer for the site and engagement with the surrounding community. Recognising the progress made, Cabinet were now being asked to consider extending the ring-fence on use of the site offered until March 2026 in order to provide BCLT more time to fully demonstrate their capacity to move forward with the project. Members were advised that the extension would also allow the Council to continue working with BCLT to ensure that the necessary steps were taken for the project to succeed enabling it, once they had been assessed as meeting the specified criteria, to move forward and enter into a formal lease agreement. In terms of benefits outlined, members noted that whilst maintaining the necessary level of oversight and accountability in seeking to ensure the scheme remained on track the approach would also provide support for continuation of a community-led initiative as well as contribute towards the much needed delivery of affordable housing within the borough with the proposals therefore commended on this basis.

In considering the report, members welcomed and supported the commitment towards encouraging and supporting community-led housing projects recognising the role they could play towards increasing the supply of affordable housing. Whilst recognising that progress on the scheme had faced challenges, support was expressed for the proposed extension of the existing arrangements in an attempt to move forward and also continue facilitating community-led initiatives recognising the benefits delivered for residents.

On the basis of the discussion at the meeting Cabinet therefore **RESOLVED:**

- (1) To confirm the position that the Brentfield Road site, as detailed at Appendix 1 of the report, continues to be ring-fenced for the purpose of Community Led Housing.
- (2) To agree that the site be ring fenced for a further period until March 2026.
- (3) To delegate authority to the Corporate Director, Neighbourhoods and Regeneration to certify whether Brent Community Land Trust (BCLT) had met the specific criteria detailed at paragraph 3.2.3 of the report and based on that certification, to approve the next steps outlined in (4) and (5) below.
- (4) To delegate authority to the Director of Property and Assets (in consultation with the Corporate Director Neighbourhoods and Regeneration) to agree heads of terms and enter into a conditional agreement for lease with the BCLT.
- (5) To delegate authority to the Director of Property and Assets to enter into a 250-year lease (and/or any ancillary legal document) with the BCLT once the conditions detailed at paragraph 3.2.3 of the report were fulfilled.
- (6) To agree in principle to further consider the use of appropriation for planning purposes under section 19 (1) of the Housing Act 1985 and/or section 122 (1) of the Local Government Act 1972 to support the development of the Brentfield Road site and to ensure the scheme was not frustrated or delayed by legal injunction.
- (7) To delegate authority to the Corporate Director Neighbourhoods and Regeneration to formally cease the site ring-fencing upon non-compliance of the specific criteria detailed at paragraph 3.2.3 of the report.
- (8) To delegate authority to the Corporate Director Neighbourhoods and Regeneration to extend the site ring fencing by an additional 6 months should BCLT fail to meet the specific criteria detailed in paragraph 3.2.3 of the report but be able to demonstrate significant progress towards meeting the criteria.
- (9) To note that should BCLT fail to meet the specific criteria detailed in paragraph 3.2.3 of the report or demonstrate significant progress towards meeting the criteria, the site would be returned to Brent Council and the formal arrangement with BCLT would cease.

12. Brent Local Development Scheme

Councillor Benea (as Cabinet Member for Regeneration, Planning & Property) introduced a report from the Corporate Director Neighbourhoods & Regeneration presenting the updated Brent Local Development Scheme, which set out the proposed timetable for the replacement of parts of the Development Plan including the Brent Local Development Plan and other planning related documents.

In presenting the report, Cabinet were advised of the key role the Local Development Scheme played in seeking to guide future growth and development of the borough and in setting out the timetable for updating not only Brent's Local Plan but also other important planning-related documents such as Supplementary

Planning Documents and Conservation Area updates. Members were advised of the importance in maintaining an up-to-date Development Plan in allowing the Council to manage and plan for growth and development in a strategic and sustainable way whilst also embracing the challenge of the anticipated continued population growth in a manner that would enable the Council to meet the housing, social and cultural needs of residents whilst also providing space for businesses and the economy to thrive. Whilst accepting that there were certain policies that would benefit from immediate review, such as reinforcement of the Council's policy on gambling establishments and student housing, members noted that the Development Scheme had also been designed to support protection and enhancement of the borough's green infrastructure as well as areas of historical and cultural significance, ensuring that development took place in a way that respected and strengthened Brent's local identity. Reference was also made to the way in which the updated Local Development Scheme would support the Council in moving towards its climate goals, supporting the drive towards carbon neutrality and addressing the ongoing challenges posed by climate change with the updated Scheme reflecting the Council's commitment to providing the necessary planning framework to deliver on those objectives, while also providing a clear and realistic timetable for the process.

In recognising the importance of the Local Development Scheme in providing a positive framework to drive sustainable growth and manage development across the borough, members also welcomed reference to the going campaign seeking review of the policy and powers available to prevent the establishment of gambling premises given their overconcentration within the borough and wider associated impacts in terms of anti-social behaviour and public health as well as the framework for prioritising review of housing delivery targets within the Local Plan based on wider changes being introduced under the National Planning Policy Framework and tacking account of the emerging London Plan. Support was also expressed for the joined up approach outlined with development of the Gypsies and Travellers Strategy, given the need identified to consider the provision and development of sufficient sites for pitches within the borough as well as reconfiguration of the Lynton Close site taking account of the revised national definition.

In support of the ongoing work being undertaken with the Mayor for London and other key strategic partners to manage the framework for development across the borough, including the development of housing delivery targets, and timing of the review to coincide with wider planning reforms being introduced Cabinet **RESOLVED** to approve the Brent Local Development Scheme as set out in Appendix A of the report.

13. **Local Flood Risk Management Strategy**

As a result of Councillor Krupa Sheth (Cabinet Member for Public Realm and Enforcement) having submitted her apologies for absence Councillor Muhammed Butt (as Leader of the Council) introduced a report from the Corporate Director Neighbourhoods & Regeneration seeking approval to an updated Flood Risk Management Strategy, which detailed the actions the Council and other key stakeholders were taking to manage flood risk in Brent and had been produced in accordance with the duties placed on Local Lead Flood Authorities under the Flood Risk Regulations 2009.

In presenting the report members were advised that whilst Brent had avoided the severe floods which had affected other parts of the country over recent years the borough was not immune to the challenges and risks presented by climate change and increasingly adverse weather events. In recognising the wider social and economic impact and increasing risk associated with flooding, members were advised the opportunity had been taken to review and refresh the Strategy outlining not only the existing efforts being undertaken and in place to manage flood risks but also the steps which it was felt were required to improve them focussing on local risks such as groundwater, surface water, and ordinary watercourses. Whilst recognising the complete prevention of flooding would not be possible to achieve members were advised the strategy had sought to prioritise actions based on evidence and resources to ensure the borough was as prepared as possible when it did occur.

In noting that the revision and update of the Strategy had followed consultation with key stakeholders, including local residents and businesses, neighbouring boroughs, Thames Water and the Environment Agency members commended the approach outlined within the strategy as a means of seeking to enhance not only the resilience of the borough in relation to flooding risk but also to address the ongoing impact of climate change. Whilst recognising the measures already in place to maintain existing local infrastructure such as gullies and drains, members also highlighted a need to ensure this was supported through enhanced cooperation and a more coordinated approach with other key partner agencies in Brent including Thames Water, Environment Agency and Canal & Rivers Trust to ensure they were also delivering their specific responsibilities locally.

Having thanked officers for the review and ongoing implementation of the necessary strategies to keep Brent safe in working to tackle the effects of climate change, Cabinet **RESOLVED** to approve the Flood Risk Strategy for Brent as detailed in Section 3 and appended to the report.

14. **Funding contribution towards next stage development costs for West London Orbital scheme**

Councillor Benea (as Cabinet Member for Regeneration, Planning & Property) introduced a report from the Corporate Director Neighbourhoods & Regeneration seeking approval for a funding contribution plus contingency to support the next stage of development of the West London Orbital Rail Scheme (WLO).

In presenting the report, members were advised that the funding being sought represented a significant step in the progression of a project seeking to deliver crucial transport infrastructure for the area given the challenge for many residents created by the current lack of efficient orbital public transport connections across West London as well as addressing concerns relating to increased traffic, congestion and air pollution. As such WLO had been developed to provide an alternative which, members were advised, would support efforts being made to address these issues and improve accessibility across the region, making it easier for residents to access work, education, and leisure opportunities without the need for lengthy or expensive travel. In addition, members noted the significant economic, social, and environmental benefits that it was anticipated the scheme would deliver for Brent including the delivery of new homes and jobs, improved access to a range of employment and learning opportunities as well as the

promotion of enhanced social inclusion, particularly for some of the more deprived areas of the borough. Given the backing of all four WLO boroughs along with the Old Oak & Park Royal Development Corporation and funding contribution by TfL towards 50% of the costs it was felt the case for investment in the scheme remained compelling with WLO also supported in Brent's Local Plan and Long-Term Transport Strategy as a key piece of infrastructure aligned with the Council's growth and sustainability goals.

In welcoming the funding proposal, members took the opportunity to highlight the wider placemaking benefits of the scheme including the delivery of enhanced social inclusion through the provision of an enhanced step free station network as well as improved connectivity through enhanced access to a range of leisure, culture, recreation, healthcare, employment and learning opportunities. Recognising the significant opportunities also offered through WLO in relation to the promotion of growth and wider environmental impact, members were keen to add their support in seeking to progress the scheme as quickly as possible given the support from the Mayor for London and wide range of benefits that would be delivered across Brent and West London as whole.

As a result, Cabinet **RESOLVED**:

- (1) To agree that the Council contribute £465,516 and £150,000 contingency funded from Strategic Community Infrastructure Levy, as its agreed share of the cost of taking forward the next stage of the development of the WLO.
- (2) To delegate authority to the Corporate Director Neighbourhoods and Regeneration, in consultation with the Cabinet Member for Regeneration, Planning and Property, to approve use of contingency for the final sum payable following confirmation from all WLO borough's governance processes.

15. **New approach to marking and celebrating community cohesion and inclusion events**

Councillor Mili Patel (Deputy Leader and Cabinet Member for Finance & Resources) introduced a report from the Corporate Director Children, Young People and Community Development which outlined the Council's new approach to community cohesion and inclusion events, detailing the overarching approach and specific components that would shape how the Council would continue to mark and celebrate events moving forward.

In presenting the report, Cabinet noted Brent's status as one of the most diverse boroughs in the country and a place where different cultures, faiths, and traditions were able to come together to create a vibrant and inclusive community. Recognising this diversity as a key strength, members were advised the new approach had been designed to strengthen the efforts being made to celebrate and foster cohesion and collaboration amongst all residents. With the previous policy last agreed in 2011 the new approach also reflected how the contextual landscape had changed in that time along with the need identified to deliver events as effectively and efficiently as possible. Recognising the need for clarity, consistency, and sustainability the new arrangements had sought to adopt an 'Enabler Approach' based on what was felt to be a fairer and more targeted methodology focussed on

empowering local communities, supporting grassroots initiatives, and ensuring that council resources were used effectively to deliver meaningful, high-quality events throughout the year. Members noted that the new approach had also sought to build on an extensive programme of engagement with residents, partners, and stakeholders, including faith and community groups and staff networks as well as review of the approach within other London boroughs. The efforts made to build on previous experience and develop a more strategic approach towards grant funding would also, it was felt, ensure community voices remained at the core of how Brent's cultural fabric was celebrated enabling local communities to take the lead with the Council taking a supportive and strategic role in delivery.

In highlighting their support for the approach outlined, members commended the focus in seeking to establish greater clarity and consistency for all stakeholders involved in the arrangement of community inclusion and cohesion events, which it was recognised would not only enable the council to better focus its resources but would also provide clear expectations around the support available for partners and residents in organising events.

In welcoming the new approach outlined as a means of strengthening relationships, fostering understanding, and reinforcing Brent's identity as a borough that embraced and championed diversity, Cabinet **RESOLVED** to endorse the new community cohesion and inclusion events approach which will replace the existing approach agreed in 2011 comprising the components outlined in paragraph 3.2.5 – 3.2.15 of the report.

16. Authority to Participate in Collaborative Procurement in respect of a new London Sexual Health and Contraception E-service

Councillor Nerva (Cabinet Member for Adult Social Care, Public Health & Leisure) introduced a report from the Corporate Director Service Reform & Strategy providing details on the London Sexual Health Commissioning Collaborative Programme (LSHP) and seeking approval to the procurement of a new London Sexual Health and Contraception E-Service through the Programme.

In presenting the report, members noted the importance of sexual health services as part of the Council's public health responsibilities with the proposals presented for consideration seeking to enhance their provision across London through a collaborative procurement that Brent had been invited to participate in with 30 other London boroughs for a new London Sexual Health and Contraception E-Service. Members were advised that the creation of an e-service was regarded as a key step in modernising the delivery of sexual health services by enabling the provision of an online service for less complex issues designed to offer patients greater convenience and choice whilst also enabling more efficient use of clinical resources by reducing the pressure on face-to-face services and allowing health care professionals to focus on the more complex cases where in-person care was required. Having noted that the approach had been developed as part of the successful London Sexual Health Commissioning Collaborative Programme (LSHP), members were advised it had also been recognised as good practice both in terms of the positive feedback from service users and way in which working collaboratively at regional level had been able to deliver more cost-effective services, within the wider context of financial pressures faced by local authorities.

In welcoming and supporting the proactive approach being taken towards the procurement to ensure residents had access to important public health provision in a way that was preferred and also aligned with local priorities and national policy objectives Cabinet **RESOLVED**:

- (1) To approve the Council's participation in a collaborative procurement with the other 30 London boroughs for a contract for the provision of the London Sexual Health and Contraceptive E-Service.
- (2) To approve an exemption from the usual tendering requirements of Contract Standing Orders 84(a) to agree that the City of London Corporation act as the lead authority in the collaborative procurement detailed in (1) above for the reasons detailed in paragraph 3 of the report and accordingly that its Standing Orders and Financial Regulations be used for the collaborative procurement.
- (3) To delegate authority to the Director of Public Health, in consultation with the Cabinet Member for Adult Social Care, Public Health and Leisure, to agree the award of a new contract with the successful bidder for a period of 5 years (with an option to extend for a further 4 years)
- (4) To delegate authority to the Director of Public Health in consultation with the Cabinet Member for Adult Social Care, Public Health and Leisure, to agree for the Council to enter into the Inter-Authority agreement (IAA), and any other necessary legal agreement/s, with the City of London Corporation, to enable the provision of services to Brent Council following completion of the procurement process.

17. Exclusion of Press and Public


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

18. Any other urgent business

There were no items of urgent business.

The meeting ended at 11.40 am

COUNCILLOR MUHAMMED BUTT
Chair

	Cabinet 19 May 2025
	Report from the Corporate Director of Children, Young People and Community Development
	Lead Member - Cabinet Member for Children, Young People and Schools (Councillor Gwen Grahl)
The Future of Islamia Primary School	

Wards Affected:	Queens Park, Preston & Stonebridge
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Part Exempt – This report refers to legal implications that have been classified as exempt pursuant to paragraph 5 of Schedule 12A of the Local Government Act 1972: “Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings”
List of Appendices:	One Appendix A: Additional Legal Considerations (exempt)
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	<p>Shirley Parks Director, Education, Partnerships and Strategy 020 8937 4259 Shirley.parks@brent.gov.uk</p> <p>Tanveer Ghani Director, Property and Assets 020 8937 1722 Tanveer.ghani@brent.gov.uk</p> <p>Marsha Henry Director of Law 4078 Marsha.henry@brent.gov.uk</p>

1.0 Executive Summary

- 1.1 This report sets out proposals on the relocation of Islamia Primary School to the Gwenneth Rickus site as a 2 Form Entry school, subject to statutory consultation, from September 2027.

- 1.2 The Yusuf Islam Foundation (YIF) served eviction notices to its Voluntary Aided Islamia Primary School (IPS) in 2022. As the Local Authority has a duty to maintain Islamia Primary School as a Voluntary Aided school, officers have been working since then with the YIF and the school's Governing Board to find an alternative site.
- 1.3 The report sets out the statutory consultation process that the Governing Board of Islamia Primary School would need to follow to undertake consultation on a proposal to relocate to the Gwenneth Rickus site in 2027.

2.0 Recommendations

That Cabinet:

- 2.1 notes the historical context and background set out in this report.
- 2.2 notes that the YIF has issued eviction notices to its Voluntary Aided Islamia Primary School and that the future options for the school are for the school to either relocate or close.
- 2.3 notes the proposal to relocate Islamia Primary School to the Gwenneth Rickus site as a 2FE school, subject to statutory consultation.
- 2.4 notes that the Governing Board would be responsible for making this proposal through statutory consultation, with Cabinet the final decision-maker.
- 2.5 notes that if the school relocated to the Gwenneth Rickus site, the site could be transferred into the name of the YIF, who would be required to hold the site for the benefit of the Islamia Primary School. Further details in terms of ownership would be set out in a Trust Deed. This would ensure that the primary school would be protected from eviction in future.

3.0 Detail

3.1 Cabinet Member Foreword:

- 3.1.1 Islamia Primary School has had voluntary aided status since 1998 and, as the only Muslim state primary school in the borough, is a popular school with 420 pupils on roll. It is important that the Local Authority supports the continuation of the school and a move to the Gwenneth Rickus site would make this possible.
- 3.1.2 School organisation and 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

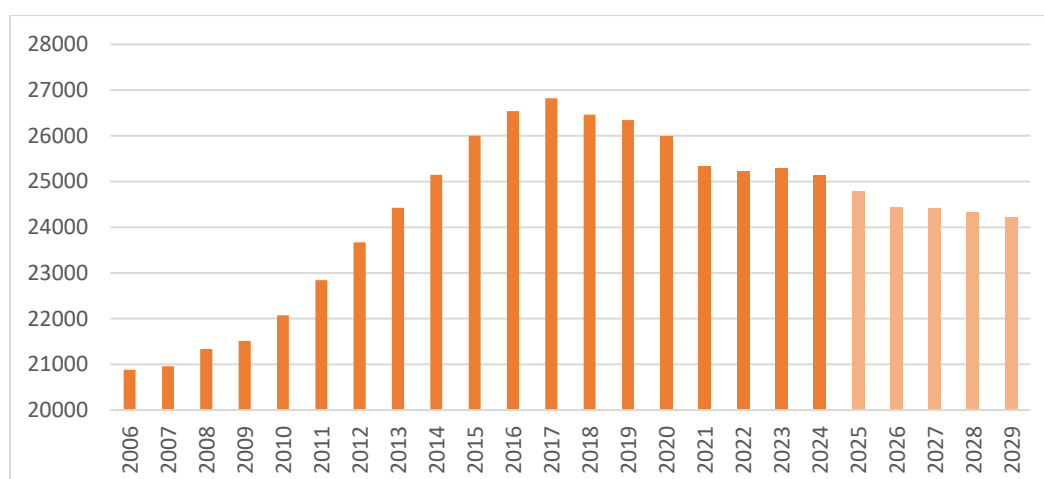
Islamia Primary School Background

- 3.2.1 Islamia Primary School (IPS) was established as an independent school in 1983 by the Islamia Schools Trust. The school was granted public funded status as a Grant Maintained school (GM) and then Voluntary Aided status in 1998 as a one form of entry school. The school is located buildings at a site in Salusbury Road that are owned by the YIF, having been purchased from Brent Council in March 1990. The buildings also house the Islamia Girls School, an independent fee paying school established by the Islamia Schools Trust, which became incorporated with the YIF in 2017.
- 3.2.2 In 2006 when the Trustees of another Voluntary Aided Muslim faith primary school, the Avenue, decided to close their school, the Governing Board of IPS agreed to publish proposals to accommodate former Avenue pupils with a view to formally expand the school through development of a new-build 2FE primary school on the Salusbury Road site. This, however, has not progressed and the school has continued to operate as a de facto two form of entry school based at the school's main site on the Salusbury Road site and occupying the top floors of Winkworth Hall on Chevening Road via a lease agreement with the Council, which was the temporary solution to meet the school's additional accommodation needs.
- 3.2.3 The Council has undertaken significant efforts since 2015 to progress build of a new primary school building on the existing Salusbury Road site. Design development work was completed for a new 2FE primary school for Islamia Primary School on the existing Salusbury Road site in 2015, but the building project was not progressed by the YIF. This would have been provided with capital funding to the sum of £10m, including ring-fenced funding secured from the Education Skills and Funding Agency (ESFA) of £2.8m as part of a targeted capital programme aimed at meeting the then demand for primary school places.
- 3.2.4 During July and October 2020, the YIF as owners of the Salusbury Road site, served notice on IPS and the Council. During January 2022, the YIF served new eviction notices on IPS and the Council requiring IPS to vacate the premises they currently occupy on Salusbury Road only by 31 July 2022 and 31 July 2023 respectively. In December 2023 a new eviction notice was served requiring the school to vacate the premises by January 2026. The YIF has agreed to further extend the current eviction notice until August 2026 to allow time for consultation on a move to the proposed new site and to extend the eviction notice for a further 12 months until August 2027 subject to a positive outcome of the final decision-making process on relocation to the new site. If an alternative site is not identified, then the only other option would be to close the school.
- 3.2.5 IPS is one of Brent's most popular schools as the only state Muslim school in the borough. The school has 418 pupils on roll (School Census January 2025) and each year the 60 Reception places are usually offered to families who applied for the school as their first preference. The school has a high sibling factor with 43% of Reception places in both September 2025 and September 2024 offered to siblings. The majority of pupils on roll are from Brent. The

numbers of out-of-borough children offered was historically low. However, this has changed since the school removed a local catchment area from its admission arrangements in 2020. 21.5% of current students live outside Brent. This is an increase on the figures from January 2024 (17.2%) and January 2023 (14.4%). 36.7% of offers made for Reception in September 2025 are for children who live outside Brent.

- 3.2.6 The initial proposal to formally expand the school in a permanent 2FE building on the Salusbury Road site was made at a time when there was a shortfall of primary school places across the borough in the context of unprecedented growth in demand for primary school places. The current position is a very different one. The latest forecasts in the refresh of the School Place Planning Strategy agreed by Cabinet in November 2024 show a reduction in demand across the borough since 2017 (Graph 1) and that demand is not anticipated to increase over the next few years. Due to falling demand, there is now a significant surplus of places across the borough (15% of capacity across all primary year groups in 2024/25).

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



The Future of Islamia Primary School

- 3.2.7 As a Voluntary Aided school, Brent Council has a duty to maintain IPS, which includes considering alternative site options. IPS is a popular school and the only Islamic faith Primary School in the borough. For this reason, the Council has been working with the Governing Board of IPS and the YIF to identify an alternative site for the school.
- 3.2.8 On 12 September 2022, Cabinet considered a report on a proposal to relocate IPS to the Strathcona site on Strathcona Road, Wembley, that was used for primary provision by Roe Green Infant School until July 2022. Relocation to this site would have required significant capital investment to increase capacity on the site to accommodate a two form of entry school. Informal consultation was subsequently undertaken by the Governing Board with staff, parents and the local community in Preston ward. Several concerns were raised during the consultation, including concerns from parents about access to the site and

concerns from local residents about increased local traffic and associated parking issues if provision on the site increased. The Governing Board did not move forward with statutory consultation on the proposal and has informed the Council that they do not wish to locate to the Strathcona site.

3.2.9 The Council has continued to consider sites across the borough for an alternative site for the school. The only site that has been identified as an alternative to the Strathcona site is the Gwenneth Rickus site on Brentfield Road. Following a site visit, the YIF and the Governing Board agreed that it could provide a suitable alternative for the school.

3.2.10 When previous consideration was given to use of the Strathcona site by IPS, the Council was asked to consider the new school in South Kilburn that will be built as part of the South Kilburn Regeneration Scheme be allocated to IPS. The new South Kilburn School is a key part of the infrastructure of the South Kilburn Regeneration Scheme and will provide a community school that will provide primary provision for families of all faiths within the area to ensure that families have choice. The school is replacing Carlton Vale Infant School and Kilburn Park Junior School and should be delivered by January 2029.

3.3 The Gwenneth Rickus Site

3.3.1 Following a period of formal consultation in February/March 2024, on 28 May 2024, Cabinet took the decision to approve a reduction in the Published Admission Number of Leopold Primary School and a phased closure of the school's provision on the Gwenneth Rickus site between September 2025 and the end of July 2027. The decision to cease the provision was taken due to the significant number of spare mainstream primary school places in the local area (Planning Area 4) linked to a decreasing primary school population. Alongside the closure of Leopold Primary School's provision on the Gwenneth Rickus site, the Published Admission Number at Mitchell Brook Primary School was reduced removing mainstream capacity to support intakes at other local schools.

3.3.2 During the public consultation phase, it was made clear that the Council would aim to retain the site for educational use, for example children and young people with special educational needs and disabilities (SEND). Officers are in the process of developing a second phase of the SEND Capital Programme that aims to increase local special school places to meet increasing demand for children and young people who have an Education, Health and Care Plan and need special provision. The programme will include development of special school satellite provision as well as new Additionally Resourced Provision using spare capacity across the school estate. While the Gwenneth Rickus site would not be available to support this programme if used by IPS, the Strathcona site would no longer be required for IPS and could be considered for special school provision.

3.3.3 It is recognised that relocating Islamia Primary School to the Gwenneth Rickus site could give concern to parents and staff who are impacted by and objected to the closure of the Leopold Primary School provision on the site. Other local

schools may also be concerned that the location of the IPS on the Gwenneth Rickus site could impact on their pupil numbers. It is the case that Islamia Primary School may attract local pupils in the future. However, as the only Muslim faith school in Brent, IPS draws from a wide area across the borough and for some pupils attending the school the site will be closer to where they live. The school also recruits pupils from other boroughs. Furthermore, the high sibling factor in the school's intakes (over 40%) means that many families currently attending the school will continue to access places in the future. Given the wide geographic area that the school serves, the school would be expected to develop a sustainable travel plan that includes public transport.

3.3.4 If there are families attending IPS who did not want to relocate to the Gwenneth Rickus site, the local authority would offer them a place in an alternative school close to where they live.

3.3.5 The relocation of IPS to the Gwenneth Rickus site would contribute to the borough's strategic objective to ensure that all children have the Best Start in Life. It would:

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

3.4 Statutory Consultation

3.4.1 The relocation of IPS would require the statutory process for making a prescribed change at a maintained school to be followed. This involves informal consultation followed by a formal statutory representation period. As a Voluntary Aided school, the Governing Board would be responsible for the proposal and complying with each step of the statutory process. The Local Authority is the decision maker and Cabinet would need to either agree or reject the proposal within two calendar months of the end of the representation period.

3.4.2 The Council would support the Governing Board in delivering the statutory consultation process. The Governing Board would need to draft a consultation document that sets out the case for the relocation and alternative options and will need to engage with stakeholders in both Queen's Park and Stonebridge wards.

3.4.3 It is proposed that the statutory process would commence with informal consultation in May 2025 and the statutory representation period would be completed by the end of the summer term in 2025. This would allow the formal proposal to relocate the school to be submitted to Cabinet for determination in September 2025.

4.0 Stakeholder and Ward Member Consultation

4.1 The Leader of the Council and the Cabinet Member for Children, Young People and Schools have been briefed on this proposal.

- 4.2 A meeting has taken place with ward councillors representing Stonebridge, Preston, and Queens Park Wards and the Cabinet Member for Children, Young People and Schools to make them aware of the proposal. Queens Park and Stonebridge ward members will be kept updated on the consultation process going forward.

5.0 Financial Implications

5.1 Capital Funding

- 5.1.1 The Gwenneth Rickus site has been used by Leopold Primary School since 2013. It has sufficient capacity for a 2FE school and does not require capital investment in additional accommodation to be utilised by IPS. A condition survey would be undertaken to determine any essential condition works that should be completed by the Council in line with the Council's Asset Management Plan before any potential transfer of the site.
- 5.1.2 £2.8m of Targeted Capital Fund was transferred from IPS to Brent by the DfE in 2012 in order to manage and deliver the planned IPS new build following the school's unsuccessful attempt at delivering the project. The design of the Salusbury Road site expansion referred to in paragraph 3.2.3 was funded using £200K of the TCF and therefore £2.6m remains. The DfE has agreed on an annual basis for this funding to be rolled forward until such time as a permanent solution for IPS has been identified. They have been asked to consider if this funding could be made available for investment in the Gwenneth Rickus site, recognizing that it is not required to provide basic need accommodation. As this would not meet the criteria for the targeted capital programme under which this funding was provided, the DfE may require it to be returned.
- 5.1.3 The DfE expects Voluntary Aided bodies to contribute towards capital works that improve their school buildings at a rate of 10% of total costs. As a voluntary aided school, IPS can apply for capital funding to support condition related works through the DfE's Condition Improvement Fund.

5.2 Revenue Funding

- 5.2.1 The school's DSG allocation currently includes £63K in split site funding, which is an element in the national funding formula allocated to schools that operate from more than one site. The school would no longer be eligible for this funding if it relocated to the Gwenneth Rickus site, reducing its per pupil funding by £150 per pupil.

6.0 Legal Implications

6.1 Agreement between parties

- 6.1.1 On 8 July and 23 October 2020 and, subsequently in 19 January 2022, the Foundation served eviction notices on IPS and the Council. The notices were served under section 30 of the School Standards and Framework Act 1998

(SSFA) and section 25 of the Landlord and Tenant Act 1954 (LTA). They required IPS to vacate the premises they currently occupy at 129 Salusbury Road by *“31 July 2022 or the end of academic year 2021/22 if later”* (in the case of the July 2020 and January 2022 notices) and by *“31 July 2023 or the end of academic year 2022/23 if later”* (in the case of the October 2020 notice). A further eviction notice was served in December 2024 requiring the school to vacate the Salusbury Road site by January 2026.

6.1.2 The Council has agreed with the YIF and the Governing Board of IPS that:

- a) the Foundation will extend the current eviction notice until August 2026 while the statutory process to relocate to the Gwenneth Rickus site is undertaken. In the event that a decision is taken following consultation to relocate the school, the notice will be extended until August 2027, requiring the school to vacate the YIF’s Salusbury Road premises by August 2027.
- b) The Local Authority will provide advice and guidance on the statutory process. Providing the statutory procedures (as required by SSFA 1998) once concluded confirm it is feasible to do so, the School will be relocated to the new site;
- c) The SSFA 1998 requires local authorities to transfer any site provided for the use of a Voluntary Aided school (a) “to the trustees of the school” or (b) if the school has no trustees, “to the schools’ foundation body”. This includes all buildings and amenity space but excludes any area defined as playing fields. The obligation is a statutory one under Paragraph 4(3) of Schedule 3 to the SSFA 1998, and typically these transfers will be referred to as “statutory transfers”. This duty is acknowledged in local authorities’ place planning function and, in partnership with trustees, operates alongside a local authority’s statutory duty to ensure there are enough school places in its area (Section 13(1) Education Act 1996).
- d) The local authority will take all reasonable measures to support the relocation of the school, if the proposal is agreed.
- e) The Yusuf Islam Foundation will be responsible for deciding the future use of the school’s current Salusbury Road site. The lease between the Council and the school for use of accommodation on the Winkworth Hall site would cease when the school relocates in 2027.

6.1.3 Further confidential legal advice can be found in Appendix A.

6.2 The relocation of Islamia Primary School

6.2.1 The legal implications associated with the Council’s statutory duty to ensure that there are sufficient school places available to meet the needs of the local population were set out in the School Place Planning Strategy 2024-28.

6.2.2 There is a requirement to follow statutory processes for the relocation of the school in line with DfE Guidance on Prescribed Changes to Maintained Schools (Statutory Guidance for Proposers and Decision-makers, Department for Education, October 2024). There is a requirement to follow statutory processes

in line with DfE Guidance on Opening and Closing Maintained Schools should a decision be taken not to retain the school.

6.2.3 The Council currently owns the Gwenneth Rickus site and the transfer would be undertaken in accordance with paragraph 6.1.2 (c)

6.2.4 Paragraph 11.8 of Part 3 of the Constitution makes it clear that nothing should prevent the Corporate Director, Finance and Resources from acquiring or disposing of freehold land or acquiring, granting or disposing of leasehold land (for any term of years) or from entering into licences and easements in respect of land and buildings so long as doing so is (or would be) in accordance with the Academies Act 2010 or any other education legislation, regulation, order, direction, circular or guidance.

7.0 Equity, 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 There is no prescribed manner in which the council must exercise its public sector equality duty but having an adequate evidence base for its decision is necessary. The proposals set out in this report aim to ensure that there are sufficient and suitable school places for Brent children.

7.3 The Governing Board will be expected to undertake an equalities impact analysis as part of the formal relocation consultation process, that includes understanding any impacts on children with SEND. Any concerns about the equality implications of this proposal would need to be considered during the informal and formal consultation processes.

8.0 Climate Change and Environmental Considerations

8.1 School place planning and admissions policies aim to ensure primary children can attend a local school and therefore can walk to school or take public transport. There are transport links to the Gwenneth Rickus site, including a bus from IPS current site. All schools in Brent can access support to develop

a sustainable travel plan and this would be encouraged for the new site if the proposal proceeds.

9.0 Human Resources/Property Implications (if appropriate)

- 9.1 The Council currently owns the Gwenneth Rickus site, which would be vacant from July 2027. If the proposal is agreed, the site would transfer to the school's Foundation or trustees as set out in paragraph 6.1.2 (c).

10.0 Communication Considerations

- 10.1 The distance between the main entrance of Islamia Primary School (129 Salusbury Road, London NW6 6PE) and the main entrance of the Gwenneth Rickus Building (242-250 Brentfield Road, London NW10 8HE) is 3.65km or 2.27 miles. As this is more than 2 miles, the statutory process must be followed to progress a proposal to relocate the school from its current site to the Gwenneth Rickus Building. This means that following a period of informal consultation, formal consultation is required to relocate the school in line with statutory guidance for making significant changes (prescribed alterations) to maintained schools (Statutory Guidance for Proposers and Decision-makers, Department for Education, October 2024) and Opening and closing maintained schools (Statutory guidance for proposers and decision makers, Department for Education, October 2024).
- 10.2 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 and Stage 4 Implementation. This process will be led by the Governing Board of IPS, supported by the local authority. Brent Cabinet is the decision-maker and will receive a report in the autumn following completion of the formal consultation process.

Document(s) for reference

School Place Planning Strategy 2024 – 2028 1st Refresh Cabinet Report 12 November 2024

Report sign off:


Nigel Chapman

Corporate Director Children, Young People &
Community Development

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

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	Cabinet 19 May 2025
	Report from the Corporate Director of Neighbourhoods and Regeneration
	Lead Member - Cabinet Member for Public Realm and Enforcement (Councillor Krupa Sheth)
Brent Local Implementation Plan (LIP) Three-Year Delivery Plan: 2025/26 – 2027/28	

Wards Affected:	All
Key or Non-Key Decision:	Key Decision
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
No. of Appendices:	Three Appendix A: Three-Year LIP Delivery Plan – 2025/26 – 2027/28 Appendix B: Transport Scheme Prioritisation Matrix – Assessment Criteria Appendix C: LIP Delivery Plan Equality Impact Assessment
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Tim Martin, Transportation Planning Manager 020 8937 6134 Email: tim.martin@brent.gov.uk Sandor Fazekas, Head of Healthy Streets & Parking 020 8937 5113 Email: Sandor.Fazekas@brent.gov.uk

1.0 Executive Summary

- 1.1 This report provides an update on Local Implementation Plan (LIP) funding arrangements for the three-year period 2025/26 – 2027/28. It provides details of the programme of transport schemes and measures approved by Transport for London (TfL) to be implemented by the Council up to 31 March 2028.

2.0 Recommendation(s)

2.1 That Cabinet:

- (a) Notes the LIP funding position and programme delivery arrangements for the three-year period 2025/26 – 2027/28.
- (b) Approves the LIP Delivery Plan for 2025/26 – 2027/28 and programme delivery arrangements detailed within the report and:
 - (i) Gives approval to the Head of Healthy Streets & Parking to deliver this programme of schemes and initiatives using the allocated budgets and resources available.
 - (ii) Authorises the Head of Healthy Streets & Parking to undertake any necessary statutory and non-statutory consultations in consultation with the Cabinet Member for Environment and Enforcement, and to consider any objections or representations regarding the proposed schemes.
 - (iii) Delegates authority to the Head of Healthy Streets & Parking in consultation with the Cabinet Member for Environment and Enforcement, as appropriate, to make the decision on whether to deliver the proposed schemes following consideration of the objections and representations in the consultation process. If, in the opinion of the Head of Healthy Streets & Parking that significant objections are raised, he is authorised to refer such objections to Cabinet for further consideration on whether to deliver the proposed schemes.
 - (iv) Authorises the Head of Healthy Streets & Parking, in consultation with the Cabinet Member for Environment and Enforcement, to amend scheme allocations where necessary (e.g. pending the outcome of detailed design and consultation) within the overall LIP budget, and in accordance with the Council's financial regulations.
 - (v) Authorises the Head of Healthy Streets & Parking to deliver schemes that receive any additional in-year grant funding as approved by Transport for London, or another funding body, or funded by the Council, subject to the outcome of consultation, and to brief the Cabinet Member for Environment and Enforcement, as appropriate.

3.0 Detail

3.1 Cabinet Member Introduction

- 3.1.1 The Brent LIP Delivery Plan identifies the measures and interventions that will be prioritised by the Council and its partners to improve transport infrastructure and travel choices in Brent over the three-year period 2025/26 – 2027/28.

- 3.1.2 Funded by Transport for London (TfL), the Delivery Plan aims to address a range of transport related problems facing the borough, including long-standing issues around congestion, poor air quality and road safety; as well as wider issues such as growing health and social inequalities and the impacts of climate change. The measures and interventions that are included in the Plan will help the Council address many of these issues and help ensure a safer, greener and more inclusive borough. They will also contribute to delivering the Mayor of London's aim for 80% of journeys to be made by sustainable modes of travel.
- 3.1.3 Underpinned by evidence-led data and informed by stakeholder engagement, the Delivery Plan will focus on the delivery of a range of high impact schemes that balance delivery across various modes of active, sustainable transport, Borough and TfL priorities, and which can be delivered at pace. The result will be the creation of a more sustainable, healthier and better-connected borough where people aspire to live and work.
- 3.1.4 The measures and interventions contained within the three-year Delivery Plan contribute to the following Borough Plan priorities:
- Making the borough cleaner and greener: improvements to bus services delivered through the Bus Priority programme and Better Bus Partnership will support the use of sustainable transport and therefore provide benefits in reducing congestion and improving air quality.
 - Establishing thriving communities: road safety and public realm improvements that design out crime and anti-social behaviour will deliver significant improvements to Brent's communities.
 - Creating a healthier Brent: improving the public realm and supporting active travel will deliver the Council's objectives in relation to improving people's Health and Wellbeing.
- 3.1.5 Brent experiences a range of transport related problems, including long-standing issues around congestion, poor air quality and road safety; as well as wider issues such as growing health and social inequalities and the impacts of climate change. The measures and interventions that are included in the three-year Delivery Plan will help the Council address many of these issues whilst helping to ensure a safer, greener and more inclusive borough. The measures in the Delivery Plan also link to and align 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 safe and secure cycling infrastructure; and travel strategies for schools and local workplaces.
 - **Joint Health and Wellbeing Strategy:** Outlines how the creation of healthy places and helping people to stay healthy 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 and

improving access for people with a disability 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.
- **Brent Long Term Transport Strategy:** Provides the strategic direction for investment in transport in Brent, with the overarching aim of improving transport options for all and to reduce the negative impacts of travel on the borough. Among the key priorities include increasing levels of sustainable travel and reducing casualties on our road network.
- **Brent Active Travel Implementation Plan:** Sets out our vision to make active travel the natural first choice for everyday journeys, and measures to make our streets safer and more inclusive for walking and cycling, improve our infrastructure, and provide support and advice to increase greener travel.
- **Brent Climate and Ecological Emergency Strategy:** A key theme is sustainable transport, supporting and encouraging active travel and the use of public transport, to reduce emissions and pollution to help resolve the climate emergency and make Brent a healthier borough.
- **Air Quality Action Plan:** with a focus on improving air quality in the borough, tackling health inequalities, and reducing pollution from road transport in the borough, encouraging walking and cycling and ultra-low emission vehicles.

3.2 Background

- 3.2.1 TfL is the primary source of funding for schemes and initiatives to improve transport infrastructure and travel choices in Brent, which comprises a range of formula, discretionary and strategic funding programmes.
- 3.2.2 Prior to the pandemic in 2020 and the subsequent impact on TfL's finances, Brent would typically receive an annual allocation of circa £3m to deliver these programmes, with the potential for additional in-year funding. Since April 2020, the Council has received a series of short-term allocations to deliver a range of small-scale Healthy Streets measures and Active Travel interventions. For the financial year 2024/25, the Council was allocated circa £1.658m to deliver a range of schemes and measures under TfL's Safer Corridors and Neighbourhoods, Bus Priority, and Cycling programmes.

Three-Year LIP Delivery Plan (2025/26 - 2027/28)

- 3.2.3 In November 2024, in line with current Mayoral guidance, the Council prepared and submitted a three-year LIP Delivery Plan for the period 2025/26 – 2027/28 to TfL. This included proposals for a range of small to medium sized schemes and interventions under TfL's existing Safer Corridors and Neighbourhoods, Bus Priority, and Cycling programmes; but also outline proposals for more comprehensive schemes under two new programmes - Borough Safer Streets and Better Bus Partnership.
- 3.2.4 In March 2025 TfL confirmed that the Council had been allocated an initial £1.578m for 2025/26, with the potential for additional in-year funding, subject to certain conditions being satisfied. Funding for 2026/27-2027/28 will be confirmed in subsequent years. A summary of the confirmed allocations for 2025/26 and indicative funding for 2026/27-2027/28 is set out in Table 3.1, below, and includes:
- £930,000 for the Safer Corridors and Neighbourhoods (SCN) programme – to include schemes aimed at improving road safety, reducing the dominance of vehicular traffic and creating safer, greener and more inclusive places for pedestrians and cyclists. An additional £89,000 of funding has also been provisionally awarded – subject to TfL being satisfied that any proposed schemes meet relevant LIP Guidance criteria.
 - £330,000 towards the delivery of bus priority improvements – including new bus lanes and measures to tackle bus pinch-points targeted at locations where buses are identified as underperforming. As set out in comments received from TfL on the Council's submitted 3-year programme, an additional £1.42m of funding has also been provisionally awarded to bus priority improvements. This is subject to certain conditions being satisfied such as, the completion of design, a pre-construction checklist and TfL approval process.
 - £60,000 towards the development of cycling schemes as part of the Safer Cycleways Network Development (CND) programme. Additional funding could be made available for scheme delivery, subject to a TfL scheme approval process and satisfying cycling quality criteria requirements.
 - £87,000 for schools and adult cycle training.
 - £77,000 for residential on-street cycle parking – to include new cycle hangers, with the potential for an additional £20,000 to be made available, subject to identifying additional proposals.
 - £94,000 for delivery of mandatory, non-docked parking bays for rental e-bikes.
- 3.2.5 TfL has also confirmed that Brent, Camden and Westminster have been successful in securing £1.5m of partnership funding in 2025/26 through the Borough Safer Streets programme to continue the delivery of the Better, Safer Kilburn scheme. Subject to scheme progression, an additional £6.5m is likely to be made available in 2026/27 – 2027/28.
- 3.2.6 The Council submitted an Expression of Interest (EoI) to TfL under its Better Bus Partnerships programme seeking funding to deliver transformational highways and public realm improvements and improve bus journey times along the A479 Empire Way and Wembley Hill Road corridor between Wembley Park

Drive and Harrow Road in Wembley - one of the most delayed sections of bus routes in Brent. Although the EoI was not shortlisted TfL has indicated that elements of the submission could potentially be funded through the Bus Priority Programme. Further discussions will be held with TfL sponsors to determine the scope of improvements and funding that can be made available in-year.

3.2.7 TfL has also set aside £4.6m of funding in 2025/26 for the delivery of Principal Road Renewal and Bridge Assessment and Strengthening schemes, with improvements targeted at high priority areas across London. However, specific borough allocations are still to be confirmed.

3.2.8 Full details of the schemes forming the Council's three-year LIP delivery plan are set out in Appendix A.

Table 3.1: Brent LIP Funding by Programme: 2025/26 Confirmed Allocations; 2026/27 - 2027/28 Indicative Programme

TfL Funding Programme (Funding Type)	London-wide Funding for 2025/26	Brent LIP Allocation 2025/26	Indicative Funding (allocations TBC)	
			2026/27	2027/28
Safer Corridors and Neighbourhoods (LIP Formula)	£36.3m	£930,000*	£1,140,000	£1,090,000
Borough Safer Streets (Discretionary)	£8m	TBC	TBC	TBC
Bus Priority (Discretionary)	£13m	£330,000*	£75,000	£75,000
Better Bus Partnership (Discretionary)		£0	TBC	TBC
Safer Cycleway Network Development (Discretionary)	£16.3m	£60,000*	£350,000	£250,000
Liveable Neighbourhoods (Discretionary)	£2.6m	N/A	N/A	N/A
Cycle Training (Base Funding + Additional linked to activation)	£2.7m	£87,000	£88,000	£88,000
Cycle Parking (Base Funding + Additional linked to activation)	£4.1m	£77,000*	TBC	TBC
Micromobility Parking (Needs based)		£94,000	TBC	TBC
Principal Road Renewal (Discretionary based on asset condition)	£2.1m	TBC	TBC	TBC

Bridge Assessment and Strengthening (Discretionary based on asset condition)	£2.5m	TBC	TBC	TBC
Total:	£87.6m	£1,578,000	£1,653,000	£1,503,000

* Denotes potential for additional in-year funding.

Scheme Identification/Prioritisation

3.2.9 The three-year Delivery Plan includes schemes/ interventions identified through several sources, including stakeholder engagement and consideration of requests from Members and the community, TfL evidence-led datasets and analysis of borough collected data. It also includes schemes linked to development activity and schemes that support Council and TfL objectives. In line with current TfL LIP Guidance, there is a specific focus on implementing new, high impact schemes that balance delivery across various modes of active, sustainable transport, core MTS outcomes, and which can be delivered at pace. Measures included in the Delivery Plan under the different programmes include:

Safer Corridors and Neighbourhoods

- A series of junction and corridor road safety improvements aimed at reducing casualties. The focus is on locations identified as high priority for collision harm or where the casualty rate is significantly above the borough average. Priorities include Chapter Road in Willesden Green; Blackbird Hill/ Tudor Gardens/ Salmon Street Junction in Welsh Harp/ Barnhill; and Junction of Mapesbury Road/ Chatsworth Road in Brondesbury Park.
- Development/ delivery of a programme of traffic management and accessibility improvements with a focus on mitigating the impact of vehicular traffic and improving conditions for pedestrians and cyclists in Queens Park, Kensal Green, Stonebridge and Harlesden.
- New and expanded Healthy School Streets schemes aimed at reducing emissions and improving air quality and facilitating increased levels of safe, sustainable travel to schools. Priority schools identified include Al-Sadiq and Al-Zahara Schools; Furness Primary School; Buxlow Preparatory School; Northwest London Jewish Day School; St Andrew and St Francis CofE Primary School; and Carlton Vale Infant School.
- A comprehensive programme of travel awareness and road safety education events and activities for schools, business and residents.

Borough Safer Streets

- A joint bid has been developed by Camden, Brent and Westminster Councils for funding to continue the delivery of the Better, Safer Kilburn scheme with the aim of making it safer and easier to walk, shop and cycle in Kilburn Town Centre. The scheme seeks to improve road safety, local air quality, maintain bus journey times and make it easier to catch public transport.

Bus Priority

- Several bus priority improvements have been identified, focused on reducing bus journey time delays and improving service reliability on some of the most delayed routes in the borough. Priorities include the installation of three new bus lanes in Kingsbury Road and the review of existing bus lane restrictions in support of Superloop and other bus services.
- Subject to further discussions, elements of the Council's unsuccessful submission under the Better Bus Partnership programme - focused on improving bus journey times along the A479 Empire Way and Wembley Hill Road corridor (between Wembley Park Drive and Harrow Road) - are also likely to be progressed under this programme.

Safer Cycleway Network Development

- A series of cycle route improvement schemes, including upgrades to Quietway 3 between Kilburn and Gladstone Park, and the development of five cycle links into the Wembley to Willesden Healthy Streets Corridor / Cycle Future Route 23 (CFR23).

Cycle Training

- A boroughwide training programme aimed at adults and pupils.

Cycle/Micromobility Parking

- Funding for the roll-out of new, secure cycle parking infrastructure for residents and schools and micromobility parking bays for dockless e-bikes.

3.2.10 In light of the still relatively low levels of funding available, schemes have been assessed and ranked using the prioritisation matrix; this was established in 2015 and approved by Cabinet as part of the report on the 2016/17 LIP submission and has been updated to reflect subsequent changes to Mayoral and borough priorities. Details of the prioritisation matrix, including the various assessment criteria used, are set out in Appendix B to this report.

Objectives/Priorities

3.2.11 Underpinning the three-year Delivery Plan are the principal goals of increasing journeys by walking, cycling and public transport whilst reducing the number of journeys made by private vehicles; and to achieve the Vision Zero ambition of nobody being killed or seriously injured on our roads. This is in line with the aims/objectives of the Brent Long Term Transport Strategy (LTTS) and the Mayor's Transport Strategy for London (MTS). Other important priorities include:

- Mitigating the impacts of traffic on the environment and our communities and creating healthier, more resilient and more welcoming streets and places – in line with the objectives of our Climate & Ecological Emergency Strategy, Air Quality Action Plan and Joint Health & Wellbeing Strategy.
- Securing transport improvements vital for delivering new housing and jobs and to connect our diverse communities – in support of our growth ambitions as set out in our Inclusive Growth Strategy and Local Plan.

Options Appraisal

3.2.12 The Council is required by the Mayor of London to prepare and submit a three-year delivery plan setting out schemes and initiatives to improve transport infrastructure and travel behaviour in the borough for the period 2025/26 - 2027/28. The schemes listed within the three-year programme have been approved by TfL and align closely with Mayoral objectives. Schemes have also been assessed and ranked using the Council's prioritisation matrix to ensure that they deliver against key Council priorities, including those set out in the Borough Plan and the LTTS. The programme of schemes also represents what can realistically be delivered by 31 March 2028 within current budgets.

Timescales

3.2.13 The three-year Delivery Plan outlines those transport schemes and measures to be implemented by the Council up to 31 March 2028.

Procurement

3.2.14 Schemes and measures within the programme will be delivered using a range of internal and external resources, including:

- The Council's Highways contract with GW and O'Hara.
- Transport and Highways consultants on Council frameworks or via tendering.
- Healthy Streets & Parking, Highways Infrastructure and Transportation Planning team staff.

Risks

3.2.15 The risks associated with the delivery plan are set out in Table 3.2.

Table 3.2: Key Delivery Plan Risks/Mitigations

Risk/ issue description (incl. impact)	Planned mitigation or resolution	Owner/s
Schemes are not supported at public consultation stage	Prioritisation of schemes where there is a high level of demand and are likely to be supported	Healthy Streets & Parking; Spatial Planning
The work cannot be completed within the budget	Reasonable contingency has been included in the estimates	Healthy Streets & Parking; Highways Infrastructure

There is insufficient funding available to deliver significant infrastructure improvements and deliver strategic objectives	Longer term planning process in place. Consideration of utilising available council budgets and/or developer funding (including S106/CIL) to continue programmes that are valued by the community	Healthy Streets & Parking; Spatial Planning
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4.0 Stakeholder and ward member consultation and engagement

- 4.1 Schemes included in the three-year LIP Delivery Plan will have non-statutory and any necessary statutory public consultation completed as part of the planning, design and delivery process. Certain schemes will also be subject to more in depth, creative community engagement to ensure that schemes provide the full range of benefits to those areas in which they are introduced. Feedback from the community is duly considered in the scheme decision reports. Where objections and/or representations are received, and they cannot be resolved or removed through further design changes and achieved within funding available, these will be discussed, and a decision agreed in consultation the Cabinet Member for Public Realm and Enforcement. Where merited, decisions may also be referred to Cabinet for further consideration.

5.0 Financial Considerations

- 5.1 The Council's LIP funding allocation for 2025/26 is an initial £1.578m, although funding allocations for some of the programmes are still to be confirmed. An additional £1.42m of Bus Priority funding and £20,000 of cycle parking funding has also been provisionally awarded – subject to certain conditions being satisfied. TfL is yet to confirm the Council's LIP funding allocation for 2026/27 and 2027/28, with an announcement on these to be made in subsequent years. The indicative value of the spending programme for years two and three of the programme is currently £3.156m.
- 5.2 The project costs outlined in the spending programme are broad estimates benchmarked against comparable projects recently undertaken and are subject to change due to design refinement, responses to community consultation, etc. If a project cost significantly differs from the estimate, the Head of Healthy Streets & Parking, in consultation with the Cabinet Member for Public Realm and Enforcement, will consider options for the transfer of available funds to alternative projects as agreed with TfL to the limit of the allocation for the various programmes.
- 5.3 Current LIP guidance stipulates that any funding received should be applied to the related financial year and does not permit any carryover of underspend; with all works for 25/26 committed or substantially completed by 31st March 2026.

6.0 Legal Considerations

- 6.1 Section 144 of the Greater London Authority Act 1999 requires that in exercising any function, London local authorities must have regard to the Mayor's Transport Strategy which sets out the transport policy framework for London.
- 6.2 The Council indicates how it will implement the Mayor's Transport Strategy through its LIP3 which sets out various objectives. The Council is required to submit a spending submission to the GLA to demonstrate how it will achieve its LIP3 objectives.
- 6.3 Section 159 of the GLA Act authorises Transport for London to provide discretionary funding to a body or person, including London local authorities, where the expenditure is, in the opinion of Transport for London, 'conductive to the provision of safe, integrated, efficient and economic transport facilities or services to, from or within Greater London'.
- 6.4 The requirements regarding publication and consultation in the making of Traffic Management Orders are set out in the Road Traffic Regulation Act 1984.
- 6.5 The Council's Financial Regulations are set out in Part 2 of the Council's Constitution.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 The Public Sector Equality Duty, as set out in section 149 of the Equality Act 2010, requires the Council, when exercising its functions, to have "due regard" to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a "protected characteristic" and those who do not share that protected characteristic. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 7.2 Having due regard involves the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.
- 7.3 The equalities implications of the LIP programme have been assessed by way of an Equality Impact Assessment (EIA). Overall, the LIP programme is expected to have a positive impact on residents from diverse backgrounds, by promoting active and sustainable travel options, and making improvements to public health and community well-being. There may however be equality impacts on older residents or those with disabilities who rely on cars due to mobility issues, which will need to be considered as part of individual schemes. The EIA of the LIP Delivery Plan is attached at Appendix C.

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 three-year LIP Delivery Plan.

9.0 Human Resources/Property Considerations (if appropriate)

- 9.1 None.

10.0 Communication Considerations

- 10.1 Any consultation undertaken as part of the planning, design and delivery of schemes in the three-year LIP Delivery Plan will be communicated to residents and stakeholders via appropriate channels.

Report sign off:

Alice Lester

Corporate Director Neighbourhoods and Regeneration

Draft Brent 3-Year LIP Delivery Plan – 2025/26 – 2027/28

TfL Programme	Scheme Name	Location/Ward	2025/26 Allocation	2026/27 Indicative Funding	2027/28 Indicative Funding	Programme of Works	Comments
Safer Corridors and Neighbourhoods	Healthy Streets & Places Programme Development	Borough wide	£65,000	£65,000	£65,000	Funding towards development of schemes/initiatives under the Council's Healthy Streets & Places programme with the aim of reducing the dominance of traffic; prioritise pedestrians, cyclists and other vulnerable road users; and enhancing the quality, resilience and general accessibility of the wider public realm, with a focus on our main town and district centres, forecourt areas around stations and other key trip generators such as schools, hospitals and visitor attractions. The outcomes of studies/designs will lead to the delivery of range of new core measures in subsequent years. Key priorities include: •Feasibility studies/designs for a network of strategic, local and leisure active travel routes and supporting interventions as outlined in the Brent Active Travel Implementation Plan. •Investigation/development of measures to reduce and mitigate the impact of motor vehicle traffic and to support sustainable travel centred on our air quality focus areas as identified in our Air Quality Action Plan. Priority pollution hotspots include Harlesden and Neasden.	
Page 4 of 5 Safer Corridors and Neighbourhoods	Promoting Safer and Healthier Travel in Brent - Schools	Borough wide	£45,000	£45,000	£45,000	Continuation of work with borough schools to promote safe, active and sustainable travel practices. All projects will be linked to the Travel for Life programme, with priority given to those schools that currently have an accreditation and encouraging others to sign up and develop a travel plan. Includes funding for: •Theatre in schools – Workshops for year 6 pupils to include key messages around active travel, road safety and air quality. £20k per year. •Junior Citizenship Scheme (JCS) – Delivery of year 6 transition project to include partnership working with the emergency services, TfL and road safety/active travel. £10k per year. •Membership of organisations and conferences – To assist with the promotion of active travel and support Vision Zero. Memberships include Road Safety GB, Modeshift and 2 Wheels London (PTW focused). £15k per year.	
Safer Corridors and Neighbourhoods	Promoting Safer and Healthier Travel in Brent - Business & Communities	Borough wide	£100,000	£100,000	£100,000	Continuation of work with Brent businesses and communities to promote safe, active and sustainable travel practices. Includes funding for: •Dr bikes & cycle marking/registering - Monthly Dr bike sessions at various locations across the borough. £25k per year. •Road safety campaigns – targeted at vulnerable road users in support of vision zero. We will review the most recent casualty data to identify target groups and where possible use material that is already available such as DFT Think materials and TfL toolkits. We will concentrate on vulnerable road users to help encourage behaviour change to active travel modes. £25k per year. •Active Travel promotion - in support of our Green Neighbourhoods programme. To include Peddle my Wheels Try before you Bike promotion, social prescribing, cycling influencers, led rides and bike markets. £25k per year. •Improving air quality/reducing emissions by encouraging active travel - Engagement/activities in support of Car Free Day, Clean Air Day and Air Quality Focus Areas. Anti idling campaigns and signs in hot spot areas. £25k per year.	

Safer Corridors and Neighbourhoods	School Travel Plans/Measures	Borough wide	£50,000	£50,000	£50,000	Smarter Travel interventions linked to the development of School Travel Plans (STPs). Funding used for supporting materials for STP work within schools and for implementation of small-scale engineering measures at schools not included in the School Streets programme. Priorities tbc. All projects will be linked to the Travel for Life programme, with priority given to those schools that currently have an accreditation and encouraging others to sign up and develop a travel plan.	
Safer Corridors and Neighbourhoods	Brent School Streets Development and Expansion	Various - TBC	£80,000	£80,000	£80,000	<p>Development of new and expansion of existing Schools Streets schemes. Priorities include:</p> <ul style="list-style-type: none"> •Al-Sadiq School and Al-Zahara School •Furness Primary School •Buxlow Preparatory School •North West London Jewish Day School •St Andrew and St Francis CofE Primary School •Carlton Vale Infant School •Lycee International De Londres •St Gregory's Catholic Science College •Donnington Primary School •Newman Catholic College •Barham Primary School •Lyon Park Primary School <p>Funding will also cover traffic surveys and air quality monitoring of school street programmes. Schemes subject to consultation with local residents and other stakeholders.</p>	
<div>Page 14</div> Safer Corridors and Neighbourhoods	Local Access Improvements/Traffic Mitigation Programme	Borough wide	£100,000	£100,000	£100,000	<p>Programme of minor pedestrian/cycle access improvements and traffic management measures aimed at addressing localised access/severance issues and mitigating the impact of traffic on our communities. To include:</p> <ul style="list-style-type: none"> • Delivery of new/review of existing waiting & loading restrictions, addressing problematic locations in the borough, including to address localised road safety issues, remove bus pinch points, etc. • Access improvement schemes to improve conditions for pedestrians and cyclists, particularly those with disabilities. 	
Safer Corridors and Neighbourhoods	Speed Reduction Programme	Borough wide	£100,000	£100,000	£100,000	Development/delivery of programme of small-scale speed reduction and other road safety measures to address local accident hot-spots and meet wider objectives around achieving 'Vision Zero' in Brent. Locations identified in Road Safety Analysis and Action Plan. Includes new 20mph zones/limits in in Harrow Rd, Willesden Lane and Robson Avenue; and speed reduction measures in Deacon Rd, Donnington Rd, Harlesden Rd, Chambers Lane, Hanover Rd, Mount Pleasant Rd.	
Safer Corridors and Neighbourhoods	Kenton Road Safety Improvements	Kenton Road/ Woodcock Hill - Kenton	£20,000	£60,000	£0	Installation of controlled pedestrian crossing facilities on all arms of signal controlled junction of Kenton Rd/Woodcock Hill. Further feasibility work required to better understand the impact on bus journey times and discussions to be held with TfL and LB Harrow about restricting some turning movements and potential utility diversions.	
Safer Corridors and Neighbourhoods	Queens Park Area Improvements	Area bounded by Chamberlayne Road / Mortimer Road / College Road / Clifford Road - Queens Park	£100,000	£50,000	£0	Development/delivery of programme of traffic management and accessibility improvements with a focus on mitigating the impact of vehicular traffic and improving conditions for pedestrians and cyclists in the Queens Park area. Exact locations and scope of works subject to feasibility/engagement, but will include changes to signal timings at Harvest Rd / Salusbury Rd / Brondesbury junction to improve safety/accessibility for pedestrians and cyclists and to improve bus journey times (as agreed following site meeting with ward councillors and TFL network performance). Funding was allocated to this scheme (BRE030) in 2024-25 to carry out feasibility study and option selection.	Funding for infrastructure beyond signal timing changes contingent on at least one core measure in a strategic location.

Safer Corridors and Neighbourhoods	Healthy Neighbourhood Development Programme	Kensal Green/Kensal Rise; Stonebridge; Harlesden	£50,000	£50,000	£50,000	Development/delivery of schemes to reduce and mitigate the impacts of traffic in residential roads and to promote active travel. Focus on areas around Kensal Green/Kensal Rise, Stonebridge and Harlesden. Exact locations and scope of works subject to feasibility/engagement, but likely to include range of localised traffic restrictions in streets in these areas. Specific locations will be confirmed prior to delivery.	Locations to be confirmed. Subject to liason with TfL Bus Client, Network Performance, completion of modelling if required and attendance at RSPRG prior to scheme implementation.
Safer Corridors and Neighbourhoods	Kingsbury 'Green Corridors'	Kingsbury 'Green Neighbourhoods' Area - Kingsbury/ Queensbury	£0	£125,000	£120,000	Development/Implementation of series of 'Green Corridors' - active travel routes linking green spaces in the Kingsbury Green Neighbourhoods Area. Details of specific interventions on each route to be confirmed priori to implementation, but priorities include: •Creation of new cycle links and supporting infrastructure along Berkley Road, Brampton Road, Valley Drive and Old Kenton Lane and Fryent Country park; •Range of traffic calming, wayfinding and pedestrian/cycle access improvements in Roe Green (Bacon Lane/Stag Lane) •Review of speed restrictions and extension of existing 20mph zone in Princes Avenue.	Funding for 2025/26 declined - scheme requires reframing to include LIP Core Measures.
Safer Corridors and Neighbourhoods	Chapter Road/ Deacon Road Road Safety Improvements	Chapter Road (Dudden Hill Lane - St Pauls Avenue/ Balmoral Road) and Deacon Road - Willesden Green	£150,000	£100,000	£100,000	Range of road safety interventions to reduce vehicle speeds/improve road safety in area around Chapter Road and Deacon Road in Dollis Hill following fatal collision. Scheme will also look at improve ped/cycle access to create safer routes to nearby Dollis Hill station and St Andrew & St Francis C of E Primary School, as well as safety/accessibility improvements to the Dudden Hill Lane/Chapter Road Junction.	Borough to work with TfL to ensure maximum safety outcomes delivered from this scheme given no core measure proposed in high priority location for safety.
Safer Corridors and Neighbourhoods	St Andrews Road/ High Road Junction Improvements	St Andrews Road/ High Road Junction - Willesden Green	£25,000	£120,000	£0	Road safety and pedestrian access improvements at busy junction - to include installation of new zebra crossing on St Andrews Road.	
Safer Corridors and Neighbourhoods	Ealing Road/ Alperton Station Pedestrian Crossing Upgrade	Ealing Road - Alperton	£0	£20,000	£80,000	Upgrade to existing zebra crossing to signal controlled crossing outside station to improve safety/accessibility for growing pedestrian and cyclist numbers and to improve bus journey times through Alperton. Ealing Road identified as a Collision Harm Priority 2 (High) link and has very poor bus speeds and variability according to SBA. Area also identified as top under SNA Vision Zero need.	
Safer Corridors and Neighbourhoods	Mapesbury Road/ Chatsworth Road Zebra Crossings	Junction of Mapesbury Road/ Chatsworth Road - Brondesbury Park	£0	£25,000	£150,000	Proposal for new zebra crossings on all four arms of junction of Mapesbury Road/Chatsworth Road following resident petition. Feasibility study 26/27, delivery 27/28.	
Safer Corridors and Neighbourhoods	Blackbird Hill/Tudor Gardens/Salmon Street Junction Improvements	Blackbird Hill/Tudor Gardens/Salmon Street Junction - Wesh Harp/Barnhill	£25,000	£0	£0	New feasibility study to investigate range of road safety and pedestrian/cycle access improvements at top collision priority node. The outcomes of study will lead to the delivery of range of new core measures in subsequent years.	
Safer Corridors and Neighbourhoods	Better, Safer Kilburn - Complementary Accessibility/Public Realm Improvements	Kilburn High Road - Kilburn	£20,000	£50,000	£50,000	Development/delivery/monitoring of series of complementary accessibility and public realm enhancements in the connecting streets linking into the wider Better, Safer Kilburn scheme. Specific interventions to be confirmed, but focus on improving access for pedestrians/cyclists. Priority improvements include introduction of a road closure/school street on Priory Park.	
Borough Safer Streets	Better, Safer Kilburn	Kilburn High Road - Kilburn	TBC	TBC	TBC	Joint scheme by Camden, Brent and Westminster Councils to make it safer and easier to walk, shop and cycle in Kilburn Town Centre. It seeks to improve road safety, local air quality, maintain bus journey times and make it easier to catch public transport. Camden to submit scheme.	Funding and conditions linked to Camden submission.

Bus Priority	Great Central Way Bus Routes 440 and 206 Improvements	Great Central Way - Wembley Park	£0	£0	£0	Bus diversion scheme from First Way into Great Central Way.	Reduced portion of 2025/26 funding request provided for feasibility initially (£30,000). Discussions regarding the bus stand relocation required. Currently it is not a strategic location and the funding request is high. Funding for design may be released after outcomes from feasibility are shared with the sponsor and TfL teams are engaged with further.
Bus Priority	Kingsbury Road Bus Lanes	Kingsbury Road - Kingsbury/ Queensbury	£175,000	£0	£0	Installation of three new bus lanes in Kingsbury Road and review of existing bus lane restrictions as part of Superloop.	Portion of 2025/26 funding request provided for feasibility and design only initially, with construction funding of £1.165m provisionally allocated. The release of construction funding is to be considered once the scheme is ready for build and pre-construction check is complete.
Bus Priority	Forty Lane Bus Lane Review	Forty Lane - Barnhill	£25,000	£0	£0	Review of existing bus lane with the view to extend hours of operation.	
Bus Priority	Dudden Hill Lane Bus Lane Review	Dudden Hill Lane - Dollis Hill/ Willesden Green	£25,000	£0	£0	Review of existing bus lane with the view to extend hours of operation.	
Bus Priority	Hillside Bus Lane Review	Hillside - Stonebridge	£25,000	£0	£0	Review of existing bus lane with the view to extend hours of operation.	
Bus Priority	Other borough bus lanes review	Borough wide	£0	£75,000	£75,000	Review of existing bus lanes in other parts of the borough with a view to extending hours of operation. Locations tbc.	
Bus Priority	Review of waiting and loading restrictions - Salusbury Road	Salusbury Road - Queens Park	£30,000	£0	£0	Review of waiting and loading restrictions outside the parade of shops in Salusbury Rd to limit interference with bus progression.	
Bus Priority	Bus stop accessibility improvements	Borough wide	£50,000	£0	£0	Series of bus stop accessibility improvements along routes 18, 92, 182, 204, 83, 223, N18.	Portion of 2025/26 funding request provided for design only initially, with construction funding of £225,000 provisionally allocated. The release of construction funding is to be considered once the scheme is ready for build and pre-construction check is complete.
Better Bus Partnership	Wembley Western Corridor Improvements Scheme	A479 between Wembley Park Drive and Harrow Road - Wembley Hill/Wembley Park/Tokynghon	£0	TBC	TBC	Expression of Interest submitted for funding to deliver transformational highways and public realm improvements scheme with a focus on improving bus journey times along the A479 between Wembley Park Drive and Harrow Road in Wembley - one of the most delayed sections of bus routes in Brent, and making it easier to catch public transport in one of the Capital’s key trip generators. The scheme also seeks to address a range of local road safety and air quality issues, whilst significantly improving conditions for pedestrians and cyclists and enhancing the quality, resilience and general accessibility of the wider public realm in the area.	
Safer Cycleway Network Development	CFR23 ‘Links In’	St John's Road, Monks Park, Stonebridge Station, Sunny Crescent and Harlesden - Tokynghon/ Stonebridge/ Harlesden & Kensal	£25,000	£250,000	£250,000	Development of five cycle links into Cycle Future Route 23 (CFR23) from St John's Road, Monks Park, Stonebridge Station, Sunny Crescent and Harlesden. Links in currently being progressed through TfL Cycleway Stage Gates 1-3 (excluding consultation) in 2024/25. Aim to progress consultation and Stage Gate 4 (Detailed Design) in 25/26 and Stage Gate 5 (Delivery) in 26/27 and 27/28 to coincide with anticipated construction timeline for the main CFR23 scheme. 2025-26 (consultation & detailed design). 2026-27 (construction). Highest cost items are relocating signalised crossing on Wembley High Road and providing stepped cycle track on Acton Lane.	Full allocation provided for design. Further funding could be made available for the delivery or part-delivery of this scheme subject to detailed design.
Safer Cycleway Network Development	Q3 upgrade and rerouting	Chatsworth Road - Brondesbury Park/Willesden Green	£35,000	£100,000	£0	Improvements to Quietway 3 identified in TfL Cycleways Assessment to enable route to be signed as a Cycleway. Improvements include provision of four parallel crossings over busy side roads and new wayfinding. Also feasibility study to provide new Cycleway link from Quietway 3 on Chatsworth Road to new cycle crossing over A5 Kilburn High Road at Burton Road. Cycle crossing to be delivered separately as part of Better, Safer Kilburn scheme.	Full allocation provided for design. The release of construction funding is to be considered once the scheme is ready for build and pre-construction check is complete.

Safer Cycleway Network Development	Big X junction Abbey Road Link	Abbey Road - Stonebridge	£0	£0	£0	Concept design and consultation of Abbey Road section of Big X cycle route in Park Royal. Scheme to include lightly segregated cycle lane or stepped track on Abbey Road, cycling amenities at roundabouts and link into existing cycle bridge over A406 North Circular Road. 2025/26 concept design and consultation. Discussion to be held with OPDC regarding potential developer funding for construction subject to progress with other arms of Big X. Anticipated construction cost ~£300K	No feasibility funding has been allocated to this scheme.
Cycle Training	Schools Cycle Training	Borough wide	£87,000	£0	£88,000	Boroughwide training programme aimed at pupils from years 5, 6, 7 and 8. Priority given to those schools signed up to STARS programme and in support of our Green Neighbourhoods programme.	
Cycle Training	Adult Cycle Training	Borough wide	£0	£88,000	£0	Programme of adult training to be delivered upon request from residents, either 1:1 or group sessions.	
Cycle Parking	Residential cycle parking	Borough wide	£77,000	TBC	TBC	Continuation of Bike Hanger installation programme. Locations TBC. Funding availability for 26/27 and 27/28 tbc.	Additional funding available (£20k).
Micromobility Parking	Dockless cycle parking bay roll-out	Borough wide	£94,000	TBC	TBC	Continuation of dockless cycle parking bay installation programme ahead of roll-out of London wide micromobility contract. Funding availability for 26/27 and 27/28 tbc.	Prioritise on-carriageway locations.
TOTAL:			£1,578,000	£1,653,000	£1,503,000	TOTAL:	£4,734,000

Page 47	Safer Corridors & Neighbourhoods Total:	£930,000	£1,140,000	£1,090,000	Key:
	Borough Safer Streets Total:	TBC	TBC	TBC	Denotes ongoing programme/initiative
	Bus Priority Total:	£330,000	£75,000	£75,000	Denotes existing scheme carried forward from previous Delivery Plan
	Better Bus Partnership Total:	£0	TBC	TBC	Denotes proposed new scheme/initiative
	Safer Cycleway Network Development Total:	£60,000	£350,000	£250,000	
	Cycle Training Total:	£87,000	£88,000	£88,000	
	Cycle Parking Total:	£77,000	TBC	TBC	
	Micromobility Parking Total:	£94,000	TBC	TBC	
	TOTAL:	£1,578,000	£1,653,000	£1,503,000	
3-YEAR TOTAL:		£4,734,000			

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Transport Scheme Prioritisation Matrix – Scheme/Programme Categories and Assessment Criteria

Scheme Type/ Programme	Scope	Example Measures/Interventions
Traffic Reduction & Mitigation Measures	Measures/initiatives aimed at reducing journeys by private vehicles and mitigating the impacts of traffic on the environment and our communities.	<ul style="list-style-type: none"> • CPZs and other parking control measures • School/workplace/personal travel plans • Sustainable local freight solutions • Selective vehicle management measures (e.g. Healthy Neighbourhoods, Low Emission Streets/Zones) • Facilities for taxis/car club vehicles • EV charging infrastructure • Intelligent transport systems (e.g. VMS, SCOOT) • 'Green' infrastructure (e.g. street trees, green walls, SuDS, etc.)
Active Travel Measures	Measures/initiatives aimed at creating an improved culture and environment for - and to increase levels of – walking, wheeling and cycling in Brent.	<ul style="list-style-type: none"> • Pedestrian/cycle route improvements • New/upgraded crossing facilities • Cycle Parking • Travel awareness, cycle training and other 'behaviour change' activities • CCTV cameras, improved street lighting and other security measures • Highways/public realm repairs/improvements
Safer Streets & Places Initiatives	Measures/initiatives aimed at reducing road casualties and making our streets and neighbourhoods safer for all road users.	<ul style="list-style-type: none"> • Road safety improvements/casualty reduction measures • Road safety education/training activities • School Streets schemes • 20mph zones/speed reduction schemes
Public Transport Improvements	Measures/initiatives aimed at improving public transport reliability, connectivity and accessibility.	<ul style="list-style-type: none"> • Bus priority improvements • Bus stop accessibility improvements • Real time passenger information • Public transport interchange enhancements

Assessment Criteria	Source of Data	Scheme Types/Programmes Assessed
LTTS Core Aim 1: Reduce traffic and facilitate healthy sustainable travel		
Area of high deprivation (IMD 1-4)	Indices of Deprivation 2019 - DCLG	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
Area of high childhood obesity (Yr 6) above England Average (>22.7%)	Brent Joint Strategic Needs Assessment (JSNA) 2023 – Brent Council	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
Air Quality Focus Area	Brent Local Plan 2022 Policies Map – Brent Council	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
Area with households owning 2 cars/vans above borough average (>12.9%)	2021 Census Data – ONS	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
Area where travel to work by car/van is above borough average (>21.7%)	2021 Census Data - ONS	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
SNA active travel and/or public transport potential (Top/Very High/High)	Healthy Streets Data Pack 2024 – TfL	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
Area with high pedestrian severance (Very High/High)	Healthy Streets Data Pack 2024 – TfL	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
Area with poor bus performance (current/forecast)	Healthy Streets Data Pack 2024 – TfL	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
LTTS Core Aim 2: Make our streets safer, greener and more equitable		
Area with casualty rate above borough average (>3.523/1000 people)	Inequalities in Road Danger Dashboard 2023 - TfL	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements

Assessment Criteria	Source of Data	Scheme Types/Programmes Assessed
Area experiencing collisions resulting in fatal or serious injury	Road Safety Data Reports 2024 - TfL	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
Area experiencing collisions involving vulnerable road user (ped/cycle/p2w)	Road Safety Data Reports 2024 - TfL	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
Collision harm priority node/link (Top/High)	Healthy Streets Data Pack 2024 – TfL	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
SNA Environmental Need (Top/Very High/High)	Healthy Streets Data Pack – 2024 TfL	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
Area in risk of surface water flooding (>0.016%)	London Climate Risk Maps 2024 - GLA	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
Area of low tree canopy cover (<20%)	London Climate Risk Maps 2024 - GLA	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
Area of high land surface temperature (>32.6c)	London Climate Risk Maps 2024 - GLA	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
LTTS Core Aim 3: Unlock growth and create exemplar places		
Area with high PTAL (4-6)	WebCAT Planning Tool - TfL	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
Local Plan Growth Area/ Intensification Corridor	Brent Local Plan 2022 Policies Map – Brent Council	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives • Public Transport Improvements
Within 800m of Local Plan site allocation (Developer funding opportunity)	Brent Local Plan 2022 Policies Map – Brent Council	<ul style="list-style-type: none"> • Traffic Reduction & Mitigation Measures • Active Travel Measures • Safer Streets & Places Initiatives

Assessment Criteria	Source of Data	Scheme Types/Programmes Assessed
		<ul style="list-style-type: none"> Public Transport Improvements
Green Neighbourhood Area	Brent Council Website	<ul style="list-style-type: none"> Traffic Reduction & Mitigation Measures Active Travel Measures Safer Streets & Places Initiatives Public Transport Improvements
Other Considerations		
Identified in Council/TfL Plan/Programme/Study or linked to existing scheme	Various Borough and Mayoral Plans (e.g. Borough Plan, Local Plan, LTTS, Climate & Ecological Emergency Strategy, Air Quality Action Plan, Health & Wellbeing Strategy, MTS, London Plan etc)	<ul style="list-style-type: none"> Traffic Reduction & Mitigation Measures Active Travel Measures Safer Streets & Places Initiatives Public Transport Improvements
Scope for match funding (Govt/TfL/Developer/Other 3rd Party)	Various Borough and Mayoral Plans (see above), Planning applications list, CIL/S106 list	<ul style="list-style-type: none"> Traffic Reduction & Mitigation Measures Active Travel Measures Safer Streets & Places Initiatives Public Transport Improvements
Evidence of wider community/stakeholder support	Consultation/engagement outcomes, complaints/petitions log, Member/resident requests	<ul style="list-style-type: none"> Traffic Reduction & Mitigation Measures Active Travel Measures Safer Streets & Places Initiatives Public Transport Improvements
Potential to deliver improvements/benefits to other Council/TfL programmes	Various Borough and Mayoral Plans (see above)	<ul style="list-style-type: none"> Traffic Reduction & Mitigation Measures Active Travel Measures Safer Streets & Places Initiatives Public Transport Improvements

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Brent Local Implementation Plan (LIP) Three-Year Delivery Plan: 2025/26 – 2027/28
DEPARTMENT:	Planning and Development Service
TEAM:	Transportation Planning
LEAD OFFICER:	Tim Martin
DATE:	07.04.2025

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 primary source of funding for schemes and initiatives to improve transport infrastructure and travel choices in Brent is Local Implementation Plan (LIP) funding, allocated through Transport for London (TfL). LIPs set out how London boroughs will deliver better transport in their area, in the context of borough priorities, the overarching Mayoral aim for 80% of journeys to be made by sustainable modes and Transport Strategy outcomes to deliver 'Healthy Streets and Healthy People'.

In November 2024, in line with current Mayoral guidance, the Council prepared and submitted a three-year LIP Delivery Plan for the period 2025/26 – 2027/28 to TfL. This included proposals for a range of small to medium sized schemes and interventions under TfL's existing Safer Corridors and Neighbourhoods, Bus Priority, and Cycling programmes; but also outlined proposals for more comprehensive schemes under two new programmes - Borough Safer Streets and Better Bus Partnership.

The LIP Delivery Plan includes schemes/interventions identified through several sources, including TfL evidence-led datasets, analysis of borough collected data and stakeholder engagement. It also includes schemes linked to development activity and schemes that support Council and TfL objectives. In line with current TfL LIP Guidance, there is a specific focus on implementing new, high impact schemes that balance delivery across various modes of active, sustainable transport, core MTS outcomes, and which can be delivered at pace.

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

The various measures within the LIP Delivery Plan will affect all Brent residents, businesses and those people who work, study, visit or just pass through the borough. However, the nature and extent of the impacts will vary from one group of people to another, just as

current transport conditions and the way people travel affect different groups in different ways.

Underpinning the LIP Delivery Plan are the principal goals of increasing journeys by walking, cycling and public transport whilst reducing the number of journeys made by private vehicles; and to achieve the Vision Zero ambition of nobody being killed or seriously injured on our roads. This is in line with the aims/objectives of the Brent Long Term Transport Strategy (LTTTS) and the Mayor's Transport Strategy for London (MTS). Other important priorities include:

- Mitigating the impacts of traffic on the environment and our communities and creating healthier, more resilient and more welcoming streets and places – in line with the objectives of our Climate & Ecological Emergency Strategy, Air Quality Action Plan and Joint Health & Wellbeing Strategy.
- Securing transport improvements vital for delivering new housing and jobs and to connect our diverse communities – in support of our growth ambitions as set out in our Inclusive Growth Strategy and Local Plan.

LIP Delivery Plan Measures/Interventions

At a broad level, it is anticipated that the various LIP Delivery Plan measures and interventions 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 reducing traffic and making our streets safer and more inclusive for walking 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.
- With high levels of deprivation and problems with obesity prevalent across the borough, providing our residents with access to appropriate support, training and equipment to help people walk and cycle will benefit all groups, but will particularly benefit the very young and and certain ethnic minority groups.
- Measures aimed at creating healthy, more resilient and more welcoming streets and neighbourhoods will be of particular benefit to the very young, the elderly and disabled groups. Measures aimed at enhancing personal safety/security will particularly benefit the elderly and women.
- A particular focus is on improving access by public transport, cycling and walking to local health, education, employment and shopping and leisure facilities. Such measures will benefit all groups, but particularly the very young, the elderly and disabled 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 LIP Delivery Plan. 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 its broadest level, transport is an important facilitator of social inclusion and wellbeing, which can affect economic and social outcomes, and therefore inequality. Where transport is available and affordable, it can provide access to different opportunities and help promote equality. In particular:

- Transport can be integral to improving equality, by increasing access to jobs, education and services. Policies that make transport more affordable (such as concessionary fares/subsidies) can be an effective way to help people living in poverty to access and maintain work. Help with transport 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.
- Transport policy cannot work in isolation and can have most benefit in reducing 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 LIP Delivery Plan 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 transport system, especially when travelling alone or at night.

That said, it is clear that not all of the proposed measures contained within the LIP Delivery Plan 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 traffic and facilitate healthy, sustainable travel, such as the introduction of cycle lanes 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 aims, objectives and measures proposed in the LIP Delivery Plan seek to address a wide range of often interconnecting issues, whilst looking to enhance the transport 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		
Race	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”.

Screening Checklist

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

If you have answered YES to ANY of the above, then proceed to section B.

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

SECTION B – IMPACTS ANALYSIS

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

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 interventions/actions contained in the LIP Delivery Plan.

Air Quality

- Road transport is the main source of nitrogen dioxide (NO_x) 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_x emissions and one-third of PM₁₀ 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 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 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.

- Among the schemes in the LIP Delivery Plan which could benefit residents include a range of 'Healthy Streets' corridor improvements, which will significantly improve conditions for pedestrians and cyclists across the borough; the provision of new/improved cycle parking facilities; and adult and school cycle training.

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 LIP Delivery Plan.

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 LIP Delivery Plan include reducing motor vehicle dominance and reallocating road space to walking 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 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 improvements to the walking and cycling 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 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

Details of impacts identified	<p>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.</p> <p>Measures to reduce traffic and facilitate an increase in walking 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 aim of the LIP Delivery Plan 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/users 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 public transport</p>
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	services (e.g. through the provision of accessible bus stops) and enhancements to the wider public realm (e.g. the provision of public seating).
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DISABILITY

Details of impacts identified	<p>Improving physical accessibility and removing barriers to people with disabilities is a key theme of the LIP Delivery Plan. 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> <p>A key aim of the LIP Delivery Plan is to reduce the use of private cars and re-purpose the kerbside to provide for other uses, such as cycle parking. As some people with disabilities are more likely to be car owners/users 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 public transport services (e.g. through the provision of accessible bus stops). In addition, individual scheme designs will take into account needs for people with disabilities, this includes assessment against the checklist for measures provided by the Royal National Institute for the Blind (RNIB).</p>
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RACE

Details of impacts identified	<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>
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	Measures in the LIP Delivery Plan 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.
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SEX

Details of impacts identified	<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 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

Details of impacts identified	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.
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PREGNANCY AND MATERNITY

Details of impacts identified	Improving physical access to public transport (e.g. through bus stop accessibility improvements) and the public realm more generally 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 health of pregnant people and fetuses 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.
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RELIGION OR BELIEF

Details of impacts identified	Mesures to improve personal safety/security on our streets will likely benefit different faith groups in much the same way as other target groups.
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GENDER REASSIGNMENT

Details of impacts identified	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.
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MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	There is no evidence to suggest that people from this protected characteristic will be disproportionately affected (either positively or negatively).
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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?

Schemes included in the LIP Delivery Plan will have non-statutory and any necessary statutory consultation completed as part of the planning, design and delivery process. In addition, larger schemes will also be subject to more in depth, creative community engagement to ensure that schemes provide the full range of benefits to those areas in which they are introduced. Where objections and/or representations are received and they cannot be resolved or removed through further design changes and achieved within funding available, these will be referred to Cabinet for further consideration.

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

The measures and interventions contained within the LIP Delivery Plan have to be seen in the wider context of policies and strategies such as the Brent Long Term Transport Strategy and the Mayor's Transport Strategy for London. Individual scheme 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 LIP Delivery Plan 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, with progress reported to TfL on a regular basis.

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. EIAs will be undertaken on larger schemes, where appropriate.

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.

Following assessment, it is considered that, on balance, the significant benefits that the objectives and measures within the LIP Delivery Plan will bring, including those to protected characteristics, will significantly outweigh the negative impacts 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. EIAs will be undertaken on larger schemes, where appropriate.

On this basis, it is recommended that the LIP Delivery Plan is implemented, but is kept under regular review.

SECTION D – RESULT

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

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


SECTION E - ACTION PLAN

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

Action	Expected outcome	Officer	Completion Date
Improve involvement and consultation with different equality groups	More regular dialogue/engagement (including through groups such as the Active Travel Forum) will help ensure key issues/concerns are taken on board when developing/ implementing transport schemes.	Transport Planning Manager; Head of Healthy Streets & Parking	Ongoing
Monitor, evaluate and review Equality Impact 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 Manager; Head of Healthy Streets & Parking	April 2026


SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Tim Martin – Transportation Planning Manager	Signature:  Date: 23/04/2025
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REVIEWING OFFICER:	Paul Lewin – Spatial Planning Manager	Signature: Date:
HEAD OF SERVICE:	David Glover – Head of Planning and Development	Signature: Date:
OPERATIONAL DIRECTOR:	Gerry Ansell – Director Inclusive Regeneration and Climate Resilience	Signature: Date:

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 Brent	Cabinet 19 May 2025
	Report from the Corporate Director of Neighbourhoods and Regeneration
	Lead Member - Cabinet Member for Regeneration, Planning & Property (Councillor Teo Benea)
Allocation and Monitoring of Strategic Community Infrastructure Levy	

Wards Affected:	All, excluding parts of Alperton, Harlesden and Kensal Green, Stonebridge and Tokyngton where the Old Oak and Park Royal Development Corporation (OPDC) is the Local Planning Authority
Key or Non-Key Decision:	Key Decision
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	One Appendix 1: SCIL Prioritisation Criteria
Background Papers:	
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	David Glover Head of Planning and Development Services 020 8937 5344 David.Glover@Brent.gov.uk

1 Executive Summary

- 1.1 This report outlines a series of proposals for updating the governance strategy for the allocation and forward planning of the Strategic Community Infrastructure Levy (SCIL). Key proposed measures include updating the Council's infrastructure delivery plan (which sets out the infrastructure needed to support development), streamlining delegated authority and approval processes, introducing prioritisation criteria, improving project monitoring and management, and enhancing SCIL allocation planning. The proposals also cover procedures for "Infrastructure Payments" and "Payments in Kind." Approval is sought for these changes, which are recommended to be implemented as a whole but could also be adopted separately with minor adjustments.

2 Recommendations

- 2.1 That Cabinet approves the proposed approach for planning, allocating and monitoring of Strategic Community Infrastructure Levy (SCIL) funding and approves the progression of these proposals to Cabinet for final approval.

3 Detail

3.1 Cabinet Member Foreword

- 3.1.1 We have successfully secured the delivery of significant growth in the borough and are one of the few London boroughs currently meeting their housing targets while also securing new jobs and workspace. This puts pressure on local infrastructure. However, this development has also enabled the Council to secure a substantial amount of Community Infrastructure Levy (CIL) funding.
- 3.1.2 The Council is now facing unprecedented financial pressures. We must carefully plan and allocate the available funding in the most effective and efficient way.
- 3.1.3 To achieve this, we have been evaluating how we plan for infrastructure, alongside mechanisms to streamline the Strategic Community Infrastructure Levy allocation and monitoring process. This paper contains several proposals that will help the Council achieve its Borough Plan and Local Plan objectives.
- 3.1.4 The Strategic Community Infrastructure Levy (SCIL) can be used to fund infrastructure to support development and can be used to respond to all five Borough Plan priorities, together with a range of other Council plans and policies including:
- Brent Local Plan
 - Inclusive Growth Strategy
 - Climate and Ecological Emergency Strategy
 - Affordable Workspace Strategy
 - Long Term Transport Strategy
- 3.1.5 Applications for SCIL funding are made by a range of internal services and external partners and must demonstrate how the new infrastructure will meet Borough and Local Plan objectives together with other relevant Council strategies to ensure they will contribute to those priorities.

3.2 Background

- 3.2.1 The Community Infrastructure Levy is a charge that is applied to new development where the amount that is payable is based on the amount of development and the nature of the use of that development.
- 3.2.2 CIL can only be spent on physical infrastructure that supports development. It cannot be used to provide or maintain infrastructure that is not related to development (e.g. potholes, general pavement repairs and other existing infrastructure deficiencies which do not relate to development).
- 3.2.3 Brent Council collects amongst the highest CIL in the country, with Brent CIL receipts totalling £27 m in 2019-20, £16 m in 2020-21, £18 m for 2021-22 and

£26 m for 2022-23, £35 m for 2023-24 and £19 m for 2024-25. However, this is likely to reduce substantially in coming years due to the significant drop-off in new development starts on site. Brent CIL is broken into three distinctive portions – the Strategic CIL (SCIL), the Neighbourhood CIL (NCIL) and the CIL Administration. This paper focuses on SCIL, which comprises between 70 % and 80 % of the Brent CIL that is collected (depending on whether the development is in a Neighbourhood Forum Area).

- 3.2.4 Since the adoption of CIL on 1st July 2013 to the end of the 2024/25 financial year, the council has collected £190 m of SCIL, the majority of which has been allocated to projects already. When taking into account the projects that are currently progressing to cabinet for the approval of SCIL funding and projects that are in the pipeline (such as the Hillside Corridor Project including the Bridge Park Leisure Centre, the St Raphael's Estate improvements and the future delivery of the West London Orbital line), the total amount of SCIL that's required for these projects exceeds the amount that is currently available.

Current SCIL Allocation and monitoring process

- 3.2.5 The current SCIL governance arrangements were agreed by Cabinet on 7th September 2020. Services or partner organisations (e.g. the NHS / ICB) who wish to bid for funding must submit details of the project to the Infrastructure Officer Working Group (IOWG), which comprises representatives of Planning, Finance and Legal Services. They must describe the project and demonstrate that it would relate to infrastructure to support development and growth within Brent.
- 3.2.6 The Infrastructure Officer Working Group consider whether the project meets the legal criteria for SCIL eligibility. The project lead must then present eligible projects to the relevant service board followed by the Capital Programme Board (CPB) for approval. For existing projects requiring up to £250k of SCIL, the allocation can be approved by Capital Programme Board. If a new project is requesting use of SCIL or the request is greater than £250k, this would require Cabinet approval.
- 3.2.7 The need to develop a strategic approach to the use of CIL was highlighted by a recent Scrutiny Committee and was a recommendation to Cabinet.
- 3.2.8 The Corporate Peer Challenge team also noted, in its feedback that "A strategic review of CIL investments, aligned to corporate priorities, is overdue. This will be particularly important to consider where investment can be made to have a positive contribution to the General Fund position." One of the recommendations presented stated "The council should also explore strategic approaches to utilising these CIL and capital reserves to deliver a net-positive impact on the council's revenue account position".
- 3.2.9 The following proposals have been developed to respond to this feedback.

Proposals

3.2.10 Five proposals are set out within this paper. It is recommended that all five of the proposals are implemented. It is recommended that the proposals are implemented concurrently, and this report has been drafted to reflect this approach. However, the proposals could be implemented independently with adjustments to each proposal to remove any cross-reference between the proposals.

3.2.11 Should the proposals receive approval, the existing processes would continue to be implemented until such time as the new proposals are ready to come forward. The proposals can be implemented incrementally, with some proposals taken forward shortly after approval.

Proposal 1: Infrastructure Delivery Plan Update

3.2.12 Brent's Infrastructure Delivery Plan (IDP) was published in 2019 to support the Local Plan and contained details of the infrastructure that was required to support the projected development and growth of Brent. It is now over 5 years old and is out of date and no longer serves as a useful resource to assist the identification of priority infrastructure for the borough.

3.2.13 It is proposed that the IDP is updated to capture the infrastructure required to support development and the growth that is expected in the borough, aligning with both Borough Plan and Local Plan objectives. This will help to ensure that infrastructure is forward planned and enable the identification and prioritisation of infrastructure that will deliver the best outcomes. This in turn should help to ensure that the SCIL is used in an effective way that reduces the need for the Council to spend other funding to deliver the infrastructure that is required.

3.2.14 This process would be led by the Infrastructure Team, with infrastructure proposals put forward by the relevant services and partner organisations who are responsible for infrastructure within the borough (such as Transport for London, the Integrated Care Board and National Health Service). The Infrastructure Team will provide information to help those services and organisations understand the location, amount, and type of growth that is expected together with estimates for when it is expected to come forward. Further work is required on the best way in which this information can be presented, but it is likely to include the mapping of the growth that is projected within the Local Plan and Area based Masterplans together with information on those sites which already have planning consent.

3.2.15 This would facilitate closer working with internal and external partners, enabling a collective conversation regarding the pressures that development places on infrastructure and services. This will enable the Council to maximise the opportunities to use SCIL to mitigate those pressures where this can be done through the provision, maintenance or improvement of infrastructure.

3.2.16 It will also enable cabinet members to engage more closely in relation to SCIL opportunities, with the ability to feed into the work that their services are undertaking to identify infrastructure needs and any associated projects and proposals. It will provide greater visibility of the funding that is available and

projects that have been put forward, so will enable better monitoring of any gaps in infrastructure identification or delivery.

3.2.17 The current IDP is a static, PDF based document. It is proposed that the new IDP comprises a live database that can be kept up-to-date and contain information on both existing and future projects. In relation to content, it is envisaged to capture the information required for the Capital Pipeline including strategic alignment (with the Borough Plan and Local Plan) together with the infrastructure cost, expected funding streams and the timescale for the infrastructure need and delivery. It would be spatially referenced so the projects viewable using GIS.

3.2.18 Submissions would be considered by the Infrastructure Team and Legal for compliance with the CIL regulations. The revised IDP would be subject to approval by the Regeneration board, Capital Programme Board and Cabinet. Following this, subsequent updates would be made quarterly with additional projects to be approved by the Regeneration Board and Capital Programme Board.

3.2.19 If agreed, the IDP update process would commence in the new financial year with the aim to complete that process by the end of the financial year.

Proposal 2 (a) to (c): Governance and Decision Making

3.2.20 The proposed governance measures relate to the SCIL allocation and approval process. A separate paper is being brought forward to Cabinet relating to the allocation of Neighbourhood CIL (NCIL).

Proposal 2(a): Introduction of prioritisation

3.2.21 It is proposed that criteria for prioritisation are introduced to the SCIL allocation process to help ensure better and more informed decisions on SCIL allocations.

3.2.22 At present, SCIL proposals must include sufficient information to describe the project and to demonstrate that it would meet the legal requirements for SCIL eligibility. Allocation bids are expected to be accompanied by information demonstrating how the proposal will address Borough Plan or Local Plan priorities. However, this does not include the full prioritisation framework that is required for Capital Pipeline.

3.2.23 Brent projects that are allocated SCIL already must go through a prioritisation process in order to be added to the Capital Pipeline. However, this takes place after SCIL is allocated. This proposal will bring the full prioritisation process forward for these projects to the point at which funding is initially allocated rather than introducing a new process.

3.2.24 However, external SCIL allocated projects are not currently added to the Capital Pipeline and therefore do not currently require this information. This proposal would therefore align the prioritisation process for external and internal projects.

- 3.2.25 The existing Capital Pipeline prioritisation criteria would be used to ensure that the processes for the allocation of Council funding are aligned (see Appendix 1).
- 3.2.26 There would be an expectation that projects are added to the Infrastructure Delivery Plan prior to be put forward for SCIL bids to ensure that Infrastructure is properly planned and to allow the forecasting of infrastructure costs and funding availability. However, it is recognised that some infrastructure projects cannot be foreseen, and project leads will still be able to bid for SCIL funding if their project is not on the plan.
- 3.2.27 The prioritisation criteria includes an assessment of savings to the revenue budget. It is suggested that, in line with how some other Councils use their SCIL, a sharper focus on some 'business as usual' activities is introduced by service areas to see if they are SCIL eligible.

Proposal 2 (b): Change to allocation approval structure

- 3.2.28 Services or partner organisations who are seeking SCIL funding currently present their projects to the IOWG who consider whether the project meets the legal criteria for SCIL. The IOWG is formed of officers from Planning, Legal and Finance.
- 3.2.29 It is proposed that infrastructure proposals are presented to the Regeneration Board (renamed the Infrastructure and Regeneration Board) instead of the IOWG.
- 3.2.30 Services and partner organisations who are bidding for SCIL funding would need to submit a paper to the Infrastructure Team with input from Finance and Legal Services. The paper will include information on the project including details of how the proposed infrastructure accords with the prioritisation criteria. The Infrastructure and Regeneration Board would consider both the prioritisation criteria and whether they agree that the infrastructure would be eligible for SCIL.
- 3.2.31 Proposals would then be considered by the Capital Programme Board and Cabinet depending on whether it is an existing or new project and the level of SCIL allocation that is required.
- 3.2.32 It should be noted that proposals are considered by the relevant board under the current procedures. This proposal looks to accelerate the process by removing the need for the IOWG to review the proposal for SCIL eligibility, but it introduces a requirement for Legal and Finance to input into the report prior to consideration by the Infrastructure and Regeneration Board to ensure that appropriate safeguards remain in place.

Proposal 2 (c): Changes to SCIL level of delegated authority

- 3.2.33 The Capital Programme Board can currently approve SCIL allocations up to the value of £250k for projects already within the Capital Programme Board through the delegation of authority to the Director of Finance who chairs the board. Bids

that are above this value or new projects are approved by Cabinet. This level of authority does not align with the budget virement process captured within the Constitution and can result in delays to the approval and delivery of infrastructure.

3.2.34 It is proposed that the level of delegated authority is increased to align with the Constitution to streamline the consideration of infrastructure proposals.

3.2.35 For projects that already benefit inclusion within the Capital Programme, it is proposed that the Regeneration Board (renamed the Infrastructure and Regeneration Board) would approve allocations up to £500 k while the Capital Programme Board would approve allocations up to £3 m. As with the existing process, authority would be delegated to the director who chairs the relevant board.

3.2.36 New projects not already within the Capital Programme or SCIL bids above £3 m would continue to be considered by Cabinet. This could be done through the annual budget setting process or through ad hoc requests for approval from Cabinet if the project has not been identified at the budget setting stage (with smaller projects grouped rather than put forward individually).

3.2.37 These changes will also encourage the forward planning of infrastructure projects which will help to ensure that infrastructure spending responds effectively to pressures and demands. It will discourage last minute ad hoc bids but will not prevent them as it is not always possible to forecast the need for infrastructure, and in some instances, match funding may become available which may necessitate an agile decision on infrastructure spending.

Proposal 3: Infrastructure monitoring and management

3.2.38 At present, infrastructure projects are monitored through several different means including financial reporting of the overall project in conjunction with their finance business partner and updates to the relevant board. However, this is not always reported to the Infrastructure Team promptly which hinders monitoring and, in some instances, has resulted in spend on eligible elements of a proposal with the funding then needing to be found from another budget.

3.2.39 It is proposed that infrastructure project managers (both internal and external) will be required to provide quarterly updates on the infrastructure projects on the timescales for the project, costs (including any over / under spends) and other issues. Reminders will be sent to all project managers by the Infrastructure Team. However, the project manager will be responsible for monitoring their own project.

3.2.40 The infrastructure list and updates will be circulated quarterly to the Regeneration Board (renamed the Infrastructure and Regeneration Board) and Capital Programme Board who will have the ability to call the project manager to present an update to the board and respond to questions. Boards will also be able to remove allocations from infrastructure projects (e.g. if it is unlikely that the project will proceed, and it is no longer a priority). The progress updates

will be reported to lead members quarterly, with updates provided to cabinet annually in December to support the Infrastructure Funding Statement process.

Proposal 4: Forward allocation of funding for future projects

- 3.2.41 Funding is currently allocated for projects where at the point at which they are looking to proceed to delivery. This has not resulted in any issues to date as the SCIL pot has been sufficient to accommodate all funding requests. However, some elements of high-cost infrastructure are expected to come forward in future years while SCIL receipts will reduce due to the slow-down in development delivery.
- 3.2.42 It is proposed that SCIL funding can be allocated for future infrastructure delivery to build up a reserve which is available for that infrastructure when required. This would go through the normal prioritisation and approval process (Infrastructure and Regeneration Board, Capital Programme Board, Cabinet), but there would be less certainty regarding the precise amount of funding required and the timescales for delivery. The need for the infrastructure, expected cost and timeframes for delivery would be reviewed and updated quarterly using the monitoring and management processes within Proposal 3.
- 3.2.43 For example, a piece of infrastructure may be known to be required in 4 years' time and expected to cost £40 million. A forward funding allocation may be approved for £10 million per annum to be allocated towards this infrastructure, and the SCIL available within those years reduced accordingly. The lead officer for that project would then continue to monitor the timescales, cost and need for that infrastructure and provide updates in line with the SCIL monitoring regime. Examples of significant infrastructure that may come forward in the future includes the Bridge Park Leisure Centre and the West London Orbital.

Proposal 5: Payments in Kind and Infrastructure Payments

- 3.2.44 The Council is permitted to accept the provision of land from a developer if that land is then used for the provision of infrastructure that forms a part of the Council's Infrastructure List. This is known as a Payment in Kind. If a Payment in Kind is accepted by the Council, then the amount of CIL that a developer must pay for the development is reduced by the value of that land. The value of that land must be determined by an independent person, using the market value of the land on the day the valuation takes place.
- 3.2.45 The Council may also accept an "Infrastructure Payment" from a developer where that developer will deliver infrastructure for which forms a part of the Council's Infrastructure List, and that infrastructure is not necessary to make the development acceptable in planning terms. In such instances, agreement would need to be reached between the council and the developer on the value of the infrastructure and the date by which the infrastructure will be provided. If such agreement is reached, the amount of CIL that the developer must pay is reduced by the value of that infrastructure.
- 3.2.46 The Council's current procedures do not cover Infrastructure Payments or Payments requests for them. However, the Council has been informally

approached by some developers recently in relation to the potential to use the Infrastructure Payment mechanism.

3.2.47 It is proposed that the process is led by the Infrastructure Team and that the approval process is similar to that for SCIL allocations. The developer would propose the use of the mechanism, set out the reason why they consider this mechanism to be applicable, the estimate value of that land or infrastructure and how they demonstrate it would meet the SCIL prioritisation criteria. The Infrastructure Team would prepare a paper on the proposal in consultation with any relevant services which would be considered by the Infrastructure and Regeneration Board, Capital Programme Board and Cabinet for in-principle agreement (depending on the value of the SCIL request and associated level of delegated authority).

3.2.48 Should this be given, the Infrastructure Team would then liaise with the developer in relation to costings / valuation and any associated supporting information that is required. The developer would be expected to cover the cost of commissioning the independent experts, but those experts would be jointly commissioned by the council and developer. The Infrastructure Team would work jointly with the Property and Assets team and Legal Services in relation to any Payments in Kind as the acceptance of this would result in land being transferred to the Council.

3.2.49 Once agreement has been reached on the value of the land or infrastructure, final approval would be sought from the Infrastructure and Regeneration Board, Capital Programme Board and then Cabinet (again, depending on the infrastructure cost and associated level of delegated authority).

Alternatives Considered

Alternative: Do nothing

3.2.49.1 This option would mean maintaining the status quo, whereby requests for SCIL come to the IOWG on an 'as and when' basis, and decisions are made on an individual basis. This is expected to result in the inability to fund some future SCIL requests for large infrastructure proposals with insufficient funding available in the SCIL pot.

3.2.49.2 The absence of forward planning is also likely to result individual infrastructure projects being approved without consideration of whether proposals represents the best use of the funding to respond to borough and local plan objectives, focus on inclusive growth and deliver cost savings for the council.

4 Stakeholder and ward member consultation and engagement

4.1 Engagement and consultation with members, as well as internal and external stakeholders, will take place at various stages as outlined in the proposals. Significant engagement will occur through the Infrastructure Delivery Plan (IDP) process to ensure all stakeholders and members:

- Understand the IDP process and the types of infrastructure SCIL can fund.

- Are informed about expected growth in the borough.
 - Have the opportunity to propose infrastructure projects for consideration.
- 4.2 Further engagement will take place through the SCIL bidding process and the monitoring of both the IDP and SCIL allocations. The proposals also include regular progress reporting on infrastructure allocations to the lead member and Cabinet.

5 Financial Considerations

- 5.1 Under the current governance structure for Capital spend, a sub-board can authorise variations to existing Capital schemes of up to £0.5 m. For variations of £0.5 m to £3 m, approval must be sought from the Capital Programme Board. The aim of proposal 2 is to align the approval for use of SCIL to the variations that can be approved by both sub-board and Capital Programme Board.
- 5.2 As at the end of Q3 2024/2025, the Council has a SCIL balance of £62.1 m that is available to currently allocate. Whilst this is a large sum of money, the borough's infrastructure needs (which are set out in the IDP) are much greater than the SCIL funds available. As such a prioritisation process to ensure that only projects which meet agreed criteria are met and where possible other funding streams are considered is good governance.
- 5.3 Applications for SCIL allocation will be accompanied by an assessment of how the project accords with the prioritisation criteria to allow for better consideration by the Regeneration Board, Capital Programme Board and Cabinet. This will allow the Capital Programme Board and Cabinet to consider how projects accord with Council priorities when determining SCIL allocations and therefore allow more informed decisions on infrastructure spending.

6 Legal Considerations

- 6.1 The proposed SCIL governance and prioritisation would produce a more coordinated decision-making process for how the Council prioritises SCIL spend to support growth linked to the Local Plan and IDP, capital programme and other council strategies.
- 6.2 SCIL is a levy that allows the Council to raise funds from developers in recognition of the fact that new development creates pressure on the borough's infrastructure. CIL must be used by authorities for funding infrastructure to support the development of its area as set out in Regulation 59 of The Community Infrastructure Levy Regulations 2010 (Amended) ("The CIL Regulations"). Infrastructure is defined in The Planning Act 2008. It has a broad definition including transport, flood defences, schools, hospitals, health, and social care facilities. As such CIL can be used to fund a wide variety of facilities such as play areas, parks, and green spaces, cultural and sports facilities and district heating. This flexibility gives local areas the opportunity to choose what infrastructure they need to deliver their relevant plan.

- 6.3 Regulation 121A of the CIL Regulations require that no later than 31st December (starting from the 31st December 2020), in each calendar year a contribution receiving authority must publish a document (“the annual infrastructure funding statement”) which comprises the following:
- (a) a statement of the infrastructure projects or types of infrastructure which the charging authority intends will be, or may be, wholly or partly funded by CIL (other than CIL to which regulation 59E or 59F applies) (“the infrastructure list”);
 - (b) a report about CIL, in relation to the previous financial year (“the reported year”), which includes the matters specified in paragraph 1 of Schedule 2 (“CIL report”);
 - (c) a report about planning obligations, in relation to the reported year, which includes the matters specified in paragraph 3 of Schedule 2 and may include the matters specified in paragraph 4 of that Schedule (“section 106 report”).
- 6.4 The statement must be published on the Council’s website.

7 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.
- 7.2 The proposed options for SCIL governance and prioritisation would not have a direct impact on EDI. This is related to the implementation of the Brent Local Plan and to that extent has been subject to an Equalities Impact Assessment. The review of the IDP will be subject to a review against EDI requirements. Moreover, each project that comes forward would need to be subject to EDI considerations.

8 Climate Change and Environmental Considerations

- 8.1 Climate change mitigation and climate resilience infrastructure is included in the current IDP, and these inclusions will be reviewed and updated as part of the development of the new IDP. The proposed approach for SCIL governance and prioritisation would not have a direct impact on Council’s environmental objectives and climate emergency strategy however, each individual project that comes forward would need to consider these implications prior to applying for SCIL funding. In addition, decisions on SCIL allocation and prioritisation are likely to have an impact on achievement of our climate and environmental objectives and so these objectives will need to be considered alongside competing council objectives and priorities.

9 Human Resources/Property Considerations (if appropriate)

- 9.1 There are no Human Resources/Property implications as a result of this report.

10 Communication Considerations

- 10.1 The updated governance strategy will be noted within the annual Infrastructure Funding Statement which is published each year on 31st December.
- 10.2 Any changes to the processes will also need to be communicated with internal and external infrastructure providers who may feed into the IDP or look to bid for SCIL funding in the future.

Report sign off:

Alice Lester

Corporate Director of Neighbourhoods & Regeneration


Strategic Infrastructure Levy Allocation and Monitoring

Appendix 1 Proposed Prioritisation Criteria

Prioritisation criteria	
Strategic Alignment	How the scheme meets the outcomes of a key service objective as stated in a strategy document, business plan or action plan. <i>In relation to SCIL, the key documents are the Infrastructure Delivery Plan, Borough Plan and Local Plan.</i>
Statutory Obligations	How the delivery of a scheme is essential to ensuring the Council meets the statutory need and without the project the Council would otherwise be at risk of failing to meet. <i>In relation to SCIL, the key statutory need is the requirement for the Community Infrastructure Levy to be spent on Infrastructure to Support Development.</i>
Risks	Whether the success of the project is dependent on mitigating high associated risks.
Financial Return	Whether the scheme generates ongoing revenue savings, a capital receipt or attract external funding (partial or fully).
Demand and Demographic Changes	Whether the scheme is required following a change in demographic, economic or social change that impact the borough and will reduce the demand for services in the borough. <i>In relation to SCIL proposals, the key change relates to infrastructure to support development and growth, in line with the priorities set out within the following table.</i>

Note: text in italics provides additional clarification on the application of the Capital Pipeline prioritisation criteria

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 Brent	Cabinet 19 May 2025
	Report from the Corporate Director Neighbourhoods and Regeneration
	Lead Member - Cabinet Member for Regeneration, Planning & Property (Councillor Teo Benea)
Alperton Station Step Free Access Funding Request	

Wards Affected:	Alperton
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
No. of Appendices:	None
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Tim Martin, Transportation Planning Manager Spatial Planning 020 8937 6134 Email: tim.martin@brent.gov.uk Paul Lewin, Spatial and Transportation Planning Manager, Spatial Planning 020 8937 6710 Email: paul.lewin@brent.gov.uk

1.0 Executive Summary

- 1.1 This report updates on proposals for step free and other access improvements at Alperton underground station, including details of a concept design produced by Transport for London (TfL), and seeks agreement for the Council to contribute up to 50% of the costs (capped at £5 million) through Strategic Community Infrastructure Levy (SCIL) towards the cost of delivering these improvements.

2.0 Recommendation(s)

- 2.1 That Cabinet:
- (a) Notes the current position and next steps regarding the development of proposals for step free and other access improvements at Alperton station.

- (b) Agrees that the Council makes a contribution of up to 50% of the costs, capped at £5 million of SCIL towards the cost of these improvements.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 The Council is committed to an ambitious growth agenda to support the borough's regeneration to meet a growing population's housing, employment, social and environmental needs. This will also require improvements to infrastructure. The Alperton Growth Area is one of the main areas for Brent's renewal and growth. Alperton station is a key piece of infrastructure that needs to be improved. It acts as a gateway for many people to the area. Currently it suffers from congestion at the barriers at peak times, only has access to platforms via stairs, has poor public toilet facilities and aesthetically, needs some refreshment/ updates.
- 3.1.2 Investment in step free access and other improvements to the station will address the Brent Borough Plan's strategic priorities including: 'Prosperity and Stability in Brent', through supporting confidence in/ desirability of the area for housing and business development; 'A Cleaner and Greener Future' through supporting more sustainable transportation options, reducing at the point of delivery emissions and supporting the move towards improving air quality; 'Thriving Communities' by enabling more vulnerable parts of the community, e.g. mobility impaired/ disabled, the elderly or those with young children to more easily and safely travel; and a 'Healthier Brent' through encouraging more active travel/ movement.
- 3.1.3 The proposals also link to and align 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 improved access to public transport.
 - **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.
 - **Brent Long Term Transport Strategy:** Provides the strategic direction for investment in transport in Brent, with the overarching aim of improving transport options for all. Among the key priorities include improving access to the public transport network.
 - **Brent Active Travel Implementation Plan:** Sets out our vision to make active travel the natural first choice for everyday journeys through improving infrastructure.
 - **Brent Climate and Ecological Emergency Strategy:** A key theme is sustainable transport, supporting and encouraging active travel and the use of public transport, to reduce emissions and pollution to help resolve the climate emergency and make Brent a healthier borough.

- **Air Quality Action Plan:** with a focus on improving air quality in the borough, tackling health inequalities, and reducing pollution from road transport in the borough, encouraging more active travel and the use of public transport.

3.2 Background

Alpertton Station Step Free Access Context and Need

- 3.2.1 There are 22 underground stations in Brent but only six of these have some form of step free access. Twelve of these stations are owned and managed by London Underground (LU), with the remainder owned by Network Rail (NR), but operated by LU. Securing step free station access improvements, as a means of making as many of the borough's stations and interchanges as possible accessible to all, is an important Council priority towards supporting inclusion and equalities.
- 3.2.2 Alpertton station is within Alpertton Growth Area. It is expected to provide over 6,000 additional homes and to become an enterprise hub accommodating new business and employment floorspace. This growth will require local infrastructure improvements. All new homes in the area are designed to be accessible, with 10% wheelchair accessible or adaptable. Not having a step-free station earlier on in the Growth Area's development will reduce public transport options for people who have specifically sought accessible dwellings that are not available elsewhere in the borough, including a number in Social or London Affordable Rented homes.
- 3.2.3 The station is used by over 3 million passengers each year. Its upgrade to provide step free access, increase passenger capacity and improve the traveller experience is important for its users and the area. The nearest station with some form of step free access is over 1.5 km away at Wembley Central. Due to the anticipated growth in population, Alpertton is considered one of the most strategically important stations in Brent to be made step-free by the Council and TfL. The upgrade will ensure that residents, workers and visitors can access public transport more safely and conveniently.
- 3.2.4 In May 2024, and following discussions with TfL and consideration by the Capital Programme Board, the Council gave an in-principle agreement to fund up to 50% of the cost, capped at £5 million, through Strategic Community Infrastructure Levy (SCIL) for Alpertton station's step-free access improvements. TfL will fund the other 50%. This agreement gave TfL sufficient confidence to progress with concept design work. This has shown that technically the scheme is deliverable at a cost which is currently within the parameters of what TfL considers acceptable for it to continue with the project. Following the completion of this work, more formal approval for this funding contribution from the Council is now being sought. This will allow TfL to proceed with detailed design and costings, and should there be no significant issues arising, to subsequently deliver the scheme.
- 3.2.5 Within the scheme's delivery stage, TfL has indicated it will bear any additional risk should the cost of the improvements rise above £10 million. The Council's contribution will be capped at £5 million. Indicative cost estimates from TfL at this stage are between £10-16 million.

Concept Designs

- 3.2.6 The station constructed in 1931 was designed by Charles Holden, and although not statutorily listed, its historic merit is acknowledged by TfL and it is a local heritage asset on Brent's local list. TfL have sought to be as sympathetic as possible to the existing structure and character in what is proposed, both in terms of limiting the extent of physical change and the style and materials used. As with any operational station with limited adjacent landownership, that consequently necessitates more extensive changes to existing premises, significant new features such as lifts are complicated, challenging and expensive to deliver.
- 3.2.7 The station has a disused escalator currently hidden from view which accesses the main ticket hall and formerly served the east bound platform. TfL is proposing to use this space to provide one of the platform lifts. Additional space made available on the east bound platform will include some updated waiting facilities.
- 3.2.8 Delivery of the lift for the west bound platform is more complicated, due to the limited public access only currently provided from the main ticket hall under the underground lines. This, which provides access to the stairs, cannot be modified to incorporate access to a lift. Creating an additional adjacent tunnel under the lines will be prohibitively expensive due to the made ground nature of the structure above. It would also be very disruptive possibly requiring line or station closure. So, TfL will instead use a tunnel structure that currently is made inaccessible on the eastern side by the commercial unit (barbers) currently visible on the station frontage. This commercial unit will need to be removed, and access provided through it from the main ticket hall to a lift. TfL will conduct appropriate negotiations with the current tenant. The shopfront feature will be retained.
- 3.2.9 In addition to these changes, to address current passenger flow capacity issues at peak times, the number of barrier gates will also be increased. Off the main ticket hall three toilets will also be provided, one of which will be of accessible design, and all of which will incorporate baby changing facilities.
- 3.2.10 When being implemented, it is anticipated that the station will be able to remain open, with the most disruptive works likely to be taken out of hours, albeit access to parts might be more limited than usual sometimes.
- 3.2.11 TfL has identified Alpertton station as a priority station in its step free access programme. However, their ability to deliver this project would be contingent to the provision of a significant amount of funding directed from sources supported by the Council. Other funding options were considered, including a straight 50/50 split with no cap, or no contribution from SCIL and reliance on TfL funding and future S106 contributions. These options were not pursued based on the risk of a rising and unknown financial commitment from the Council in the face of many other pressures, and the anticipated inability of TfL to deliver without significant partnership funding plus the length of time it would take to secure sufficient funding via nearby future developments.

Timescales

3.2.12 The projected project timelines are as follows:

- **May 2025 to Summer 2026** – TfL to undertake detailed design and procurement.
- **Summer 2026** – Funding agreement agreed and Brent to provide SCIL funding to TfL.
- **Summer 2026 to Summer 2027** - Construction.
- **Summer 2027** – lifts in use.

4.0 Stakeholder and ward member consultation and engagement

- 4.1 The Leader and the Cabinet Member Regeneration, Planning & Property and Cabinet Member Public Realm and Enforcement have been briefed on the project before PCG approved the initial in principle agreement to support the scheme with SCIL funds and since the concept design was received from TfL. It is anticipated that once the scheme starts to progress TfL will give it greater publicity, undertake some engagement processes with station users, and be able to provide additional advice to the ward members on the scheme.

5.0 Financial Considerations

- 5.1 The current estimated cost of the station access improvements is between £10 million and £16 million. The financial ask from TfL is for £5m of SCIL as Brent's contribution to the capital cost of the works. There are sufficient unallocated funds in the SCIL pot to cover this. Brent's contribution via SCIL is fixed at £5m with the remainder of costs, including any potential increases, to be met by TfL. The SCIL funding ask is in addition to circa. £1 million of S106 money already collected on behalf of TfL for various station improvements.
- 5.2 In addition to capital costs, there will be some officer time required throughout the progress of the project and on drafting the funding agreement, to be met from 'business as usual' costs.

6.0 Legal Considerations

- 6.1 CIL is a charge which can be levied by local authorities on new development in their area. It is an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area. It can be used to fund a very broad range of facilities such as transport facilities, play areas, open spaces, parks and green spaces, cultural and sports facilities, healthcare facilities, academies and free schools, district heating schemes and police stations and other community safety facilities. This flexibility gives local areas the opportunity to choose what infrastructure they need to deliver their relevant plan.
- 6.2 Local authorities must spend the levy on infrastructure needed to support the development of their area, and they will decide what infrastructure is needed, as set out in the Infrastructure Delivery Plan. Brent's Infrastructure Delivery Plan includes transport facilities.
- 6.3 The levy can be used to increase the capacity of existing infrastructure or to repair failing existing infrastructure, if that is necessary to support development.

It is considered that the proposed works meet the regulations for spending SCIL in accordance with Section 216(2) of the Planning Act 2008 (As amended).

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 The Public Sector Equality Duty, as set out in section 149 of the Equality Act 2010, requires the Council, when exercising its functions, to have “due regard” to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a “protected characteristic” and those who do not share that protected characteristic. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 7.2 Having due regard involves the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.
- 7.3 Overall, the proposals are expected to have a positive impact on residents from diverse backgrounds, which are in higher concentration in this ward than the national average, by promoting sustainable travel options, and making improvements to community well-being. The proposals will particularly benefit older residents, those with disabilities and maternity/people with young children who often rely on lifts to access station platforms or have a greater likelihood of requiring public toilet facilities. The spaces created will be subject to safety audits and seek to reduce crime or the fear of crime for more vulnerable people with protected characteristics.

8.0 Climate Change and Environmental Considerations

- 8.1 Supporting and encouraging sustainable travel – in particular greater use of public transport, is seen as key to helping resolve the climate emergency and addressing poor air quality. Amongst the key priorities identified in the Brent Climate and Ecological Emergency Strategy and the Brent Air Quality Action Plan include improving accessibility to public transport.

9.0 Human Resources/Property Considerations (if appropriate)

- 9.1 None.

10.0 Communication Considerations


- 10.1 Any consultation undertaken as part of the planning, design and delivery of the proposals will be communicated to residents and stakeholders via appropriate channels. TfL will lead on communications, but the Council will seek assurance that any communications cite the step free access works as a project jointly funded by Brent Council.

Report sign off:

Alice Lester

Corporate Director Neighbourhoods and Regeneration

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	Cabinet 19 May 2025
	Report from the Corporate Director Neighbourhoods and Regeneration
	Lead Member - Cabinet Member Regeneration, Planning and Property (Councillor Teo Benea)
Kilburn Neighbourhood Plan – Publication Consultation and Next Stages	
Wards Affected:	Brondesbury Park, Kilburn and Queens Park
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	One Appendix A: Draft Kilburn Neighbourhood Plan
Background Papers:	Kilburn Neighbourhood Plan Consultation Statement Kilburn Neighbourhood Plan Basic Conditions Statement
Contact Officer(s):	Paul Lewin, Spatial and Transportation Planning Manager 020 8937 6710 paul.lewin@brent.gov.uk Hilary Seaton, Principal Planning Policy Officer 020 8937 1427 hilary.seaton@brent.gov.uk

1.0 Executive Summary

- 1.1. This report provides an overview of the process which Kilburn Neighbourhood Plan Forum has followed in producing the draft Kilburn Neighbourhood Plan and a summary of its content. It sets out the next stages that the Plan will have to go through to become part of the development plan and seeks authority from Cabinet to undertake these.
- 1.2. It recommends that the draft Plan is published for consultation for a minimum of 6 weeks; that an independent examiner is appointed and subsequently the draft Plan is submitted along with responses received for examination. If the

independent examiner's report concludes the plan meets the basic conditions and can proceed to referendum it recommends that this is done via a delegated decision of Corporate Director Neighbourhoods and Regeneration, in consultation with the Cabinet Member for Regeneration, Planning and Property and, if it attains a favourable result, that the Kilburn Neighbourhood Plan is made (the term for adopted as set out in regulations).

- 1.3. It also recommends that the Council's formal response to the Plan as a consultee be delegated to Corporate Director Neighbourhoods and Regeneration, in consultation with the Cabinet Member for Regeneration, Planning and Property.

2.0 Recommendation

- 2.1 That Cabinet agree that:

- (a) the draft Kilburn Neighbourhood Plan as set out in Appendix A of this report is published for public consultation for a minimum of 6 weeks;
- (b) the Corporate Director Neighbourhoods and Regeneration, in consultation with the Cabinet Member for Regeneration, Planning and Property responds to the formal public consultation on behalf of the London Borough of Brent;
- (c) in consultation with the London Borough of Camden and the Kilburn Neighbourhood Plan Forum, an independent examiner is appointed;
- (d) following public consultation, the draft Plan and representations received are submitted for independent examination;
- (e) following receipt of the examiner's report, the Corporate Director Neighbourhoods and Regeneration, in consultation with the Cabinet Member for Regeneration, Planning and Property be authorised to publish the Council's decision notice, update the Kilburn Neighbourhood Plan, undertake a referendum and, subject to a majority of votes cast in favour, that the Kilburn Neighbourhood Plan is made by the Council.

3.0 Detail

Cabinet Member Foreword

- 3.1 Neighbourhood planning is an opportunity for residents and businesses in an area to identify their own policies at a very localised level to be applied to development in their areas. It is supported by the Council, as a means of actively engaging residents and businesses in thinking about how their area can positively adapt to the change that development can bring. The policies that neighbourhoods can take forward are very much at their discretion but arguably could encompass some or all the five strategic priorities set out in the borough plan.

- 3.2 The Kilburn Plan sets out policies for Kilburn High Road which through supporting the town centre seek to deliver the Borough Plan's priority of 'Prosperity and Stability in Brent', identified improvements to the public realm will help to deliver the priority for 'A Cleaner, Greener Future' and health benefits for the priority 'A Healthier Brent'. The Plan acts as a focus for the Kilburn community to meet the priority of 'Thriving Communities', through enabling communities to set out and plan for their vision for their area.

Background

- 3.3 Neighbourhood planning was introduced through the Localism Act 2011. It enables communities to develop planning policies that when brought into force become part of the statutory development plan for their area. Neighbourhood planning is delivered by 'neighbourhood forums' for their 'neighbourhood area'.

Kilburn Neighbourhood Plan Forum

- 3.4 The Kilburn Neighbourhood Plan Forum covers a neighbourhood area within both the London Boroughs of Brent and Camden. It was designated on 2nd June 2016 by the Council and 3rd June 2016 by the London Borough of Camden. The Forum was redesignated for a further five years in Brent on 21st January 2022 and in Camden on 28th January 2022.

Kilburn Neighbourhood Plan

Stages so far

- 3.5 The Forum (and its predecessor 'the steering group') have been involved in neighbourhood planning since 2014. Appendix 10 of the [Kilburn Neighbourhood Plan Consultation Statement](#) sets out a timeline of key meetings, events and publications between 2014 and 2023. These were prior to the formal 6-week statutory pre-submission consultation period required in accordance with Regulation 14 of The Neighbourhood Planning Regulations 2012, which took place from 1 October 2023 to 31 January 2024. The Consultation Statement details consultation events and actions including engagement at One Kilburn network meetings, a drop-in session at the Kiln Theatre, visits to businesses, and sharing publicity material online and through nurseries, schools, family centres, pubs, places of worship and Kilburn Kitchen free meal stalls. 348 questionnaire responses were received. As a result of the pre-submission consultation, several changes were made to the draft Plan, which are outlined in Section 4.3 of the Consultation Statement. The draft Plan as set out in Appendix A was formally submitted to Brent and Camden Councils on 6 February 2025 with a view to both Councils going through the necessary procedures for its independent examination and subsequent steps to occur.

Vision, objectives and planning policies

- 3.6 A vision for Kilburn is set out in section 4.3 of the Neighbourhood Plan. This states 'Kilburn will remain a distinctive and important part of London, an area that stitches together a community divided by an administrative boundary. The

character of Kilburn shall be strengthened, reflecting its rich legacy of architectural quality, vibrant social and commercial life, and cultural identity.' The vision statement also references design, Kilburn's history as a 'music mile', public realm improvements, attracting new businesses, the provision of facilities such as public lavatories and seating areas, improved disabled access, improved drainage and enhanced street greening. The Plan identifies four key objectives which build upon the vision and provide a framework for policies in the Neighbourhood Plan. These are 'A welcoming Kilburn', 'A characterful Kilburn', 'A distinct Kilburn' and 'A coordinated Kilburn'.

- 3.7 The Plan contains nine planning policies addressing a variety of subjects including public realm, mobility hubs, design principles, shopfronts, streets for people, land use of retail frontage, creative industries, markets and outdoor stalls and social and community facilities.

'Project boxes'

- 3.8 Six 'project boxes', which are separate to the formal planning policies, are also included within the draft Plan. These cover projects that the community are seeking, which will need to be explored further and developed with other organisations and delivery partners. The Neighbourhood Plan envisages that any funding made available through Neighbourhood Community Infrastructure Levy (NCIL) funds or other sources of funding might be directed towards these areas. Topics covered include public realm initiatives, delivery of a green corridor, Kilburn shopfront design, active, healthy, clean and safer neighbourhoods, gallery space and the establishment of a standing committee to monitor implementation of the Neighbourhood Plan. These project boxes will not be formally adopted planning policies of the Neighbourhood Plan.

Council's Role and Procedural Steps

- 3.9 The Council's role prior to submission has been to provide Kilburn Neighbourhood Plan Forum with guidance in meeting the statutory requirements and following the correct process in producing a Neighbourhood Plan. It is required to do this by the Localism Act 2011 and associated Neighbourhood Planning regulations. The Council jointly with Camden has provided comments on the draft Plan and sought to ensure that whilst seeking to deliver local community priorities the Neighbourhood Plan positively addresses development and growth.
- 3.10 Following the formal submission of the draft Kilburn Neighbourhood Plan and supporting documents (background papers), the Council is required to assess the Plan against the relevant statutory requirements prior to its publication and its independent examination. This has been undertaken, and the draft Neighbourhood Plan is considered to satisfy the necessary processes followed in respect of its production and to comply with the basic conditions detailed in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). Through undertaking this role, it is considered that the draft Plan's policies are consistent with Brent's existing strategic policy as well as London

Plan and national policy; this however ultimately is to be formally determined by an independent examiner.

- 3.11 It should also be noted that work towards a new Camden Local Plan and a new London Plan is in progress and the Council may reserve the right to comment on the draft Kilburn Neighbourhood Plan to ensure it is future-proofed and remains consistent with these strategic policies in the longer term. Taking this into account, regulation 16 of the Neighbourhood Planning (General) Regulations 2012 states that the Council must as soon as possible publish the plan for consultation after its receipt.
- 3.12 Brent Council and Camden Council have been regularly consulted during the draft Plan's production and advice so far has mostly been taken on board by the Forum, however, the Council reserves the right to provide further feedback on the draft Plan during the formal consultation stage. What has been included in the draft Plan is ultimately a matter for the Forum. The Council's role is to ensure that the Plan has followed the necessary statutory processes.
- 3.13 In terms of the Plan's content, approval of publication does not imply that the Council fully accepts and agrees with its content. The Council will also be a consultee on the Plan and if it has any objections and proposed amendments to the Plan, it has the same rights as any other party to make representations. The Council strongly encourages and expects the Forum to consider fully any consultation comments made and suggest any necessary modifications to the Plan during the examination process in the spirit of good consultation and engagement. These will be taken account of through the independent examination.
- 3.14 To allow the Neighbourhood Plan to progress, Cabinet's approval is sought to publicise the Plan for a minimum 6-week period in accordance with Regulation 16. The Council must publicise details of the plan and how to make representations on its website, as well as make it available for inspection at its offices to ensure that people who live, work and carry out business in the neighbourhood area are able to view it and make representations accordingly. As identified in the Council's Statement of Community Involvement (SCI), the Council is also responsible for publicising the consultation period to those on the Local Plan consultation database and any consultee referred to in the consultation statement via email or letter. Where appropriate, the consultation will be publicised by press release and social media. Following this period the Council, in consultation with the Camden Council and the Neighbourhood Forum, must select and appoint an independent examiner. Cabinet's approval is also sought for this to be undertaken and for the draft Plan and its associated documents, plus consultation representations to be submitted to the appointed examiner for independent examination.
- 3.15 Due to the Neighbourhood Plan area also falling within the administrative boundaries of the London Borough of Camden, it too will go through a similar approval process for consultation and subsequent stages.

The Examination and Subsequent Stages

- 3.16 Examination of a Neighbourhood Plan usually takes the form of written representations, unless in the opinion of the examiner hearings are required. Following the examination, the examiner will provide a report. The report will include conclusions on whether the Plan meets the basic conditions, if any modifications are needed and whether the Plan should progress to referendum.

Referendum

- 3.17 Upon receipt of the examiner's report, the Council must outline what actions it will take in response to the recommendations and as soon as possible (within 5 weeks unless the Council decides not to follow the examiner's recommendations or agrees another timescale with the Neighbourhood Forum) after deciding, publish a 'decision statement' setting out whether the Plan should proceed to referendum. As it covers more than one Local Planning Authority boundary, the referendum will have to be held within 84 working days of the decision to hold one having taken place.
- 3.18 The referendum is organised by the Councils. A person is entitled to vote if at the time of referendum, they live in the neighbourhood area and meet the eligibility criteria to vote in a local election. If more than 50% of people voting in the referendum are in favour of the Plan, then the Plan can be made (adopted/ given legal effect) by the local planning authority. It must do this within 8 weeks of the referendum. The only circumstance where the local planning authority is not required to make the Plan is where it would breach, or otherwise be incompatible with, European or Human Rights obligations.

Other processes towards adoption

- 3.19 The examination of a Neighbourhood Plan by the examiner may recommend changes, although significant changes are likely to be few. The Kilburn Neighbourhood Plan has been subject to professional advice and extensive consultation.

Post adoption

- 3.20 Once the Neighbourhood Plan is 'made' (adopted) it will form part of the development plan. Planning applications in the Neighbourhood Area will be determined in accordance with the Plan unless material considerations indicate otherwise. The Plan will remain in place until it is either amended, replaced or revoked by a forum that covers the area. If remaining unchanged in the future, over time its weight as a material consideration will diminish, particularly if it is superseded by relevant London, borough and national planning policies.

Cabinet decision-making and suggested delegation

- 3.21 The Council's constitution does not specifically address neighbourhood planning, albeit that legislation sets out and expects Councils to deal with neighbourhood planning processes in an expeditious manner. The

recommendations for Cabinet are therefore in the spirit of supporting proportionate oversight and timely implementation of the Council's statutory role in the process of plan making. The Plan has had a good level of engagement and at this stage is considered by officers to be relatively uncontroversial in its content and consistent with regulations in terms of necessary processes undertaken.

- 3.22 Cabinet's approval is sought for the necessary next stages now, rather than having to bring each stage back to Cabinet. Safeguards to ensure appropriate oversight of for example the Council's response as Local Planning Authority and in the consideration of the examiner's report and the Forum's amendment of the Plan prior to referendum have been addressed through recommending that Cabinet delegate the appropriate actions to the Corporate Director Neighbourhoods and Regeneration, in consultation with the Cabinet Member for Regeneration, Planning and Property. Should circumstances change and the Plan process not be as simple as anticipated, decision making would be expected to revert to Cabinet at the appropriate stage.

Timescales

- 3.23 It is anticipated that consultation will occur in late May to July 2025, the examiner will undertake the examination in Autumn/Winter 2025, and the examiner's report will be received late 2025 or early 2026. The Councils will then consider the report's findings and decide whether to proceed to referendum. If the referendum proceeds, this is likely to take place in Spring 2026. If successful, the Plan could then be 'made'.

- 3.24 A summary of the timescales is set out below:

- May to July 2025 – Brent Council and Camden Council publish the draft Plan on behalf of the Neighbourhood Forum for public consultation for a minimum of 6 weeks
- July 2025 – The Council formally responds in its role as a consultee on the draft Kilburn Neighbourhood Plan via a delegated approval of the Corporate Director Neighbourhoods and Regeneration, in consultation with the Cabinet Member for Regeneration, Planning and Property
- Summer/Autumn 2025 – The Council appoints an independent examiner in consultation with Camden Council and the Neighbourhood Forum
- Summer/Autumn 2025 – Draft Plan and consultation representations are submitted for independent examination
- Autumn/Winter 2025 - Examination takes place through written representations and/or hearings – modifications may be proposed throughout this process
- Late 2025/early 2026 - Examiner's report received
- Usually within 5 weeks – The Corporate Director in consultation with the Cabinet Member publishes the Council's decision notice and updates the Kilburn Neighbourhood Plan
- Within 84 working days – The Council undertakes a referendum

- Within 8 weeks – Subject to a positive referendum result, the Neighbourhood Plan is ‘made’ (i.e formally adopted) by the Council and Camden Council

4.0 Options

4.1 There are essentially three options:

- a) Proceed with the publication and associated steps as set out in the recommendations.
- b) Proceed with the publication and for Cabinet to suggest alternatives to the level of delegation proposed, and
- c) Do not proceed with the publication and associated steps for the making of the Plan as set out in the recommendations.

Option a)

- 4.2 The Council is required to support neighbourhood planning. Where a draft neighbourhood plan has been submitted to the Council and meets the basic conditions, the Council is required through legislation to proceed to consultation. The same is true for the subsequent steps. As such, the Council effectively has no choice and is required to undertake its duties in a timely manner.
- 4.3 The level of delegation set out in the recommendations, rather than reverting to Cabinet to approve subsequent stages, is considered appropriate, balancing necessary and appropriate oversight with Government’s requirements for the neighbourhood planning process to be undertaken in a timely manner. As such, Option A is recommended.

Option b)

- 4.4 Whilst accepting the position set out in paragraph 4.2 of this report, Cabinet may consider that it wishes to have greater oversight of the neighbourhood plan in the following stages, with it receiving reports for its consideration prior the Council making the plan. Notwithstanding the potential delays to the next stages compared to option a) this option could be supported if there are sound reasons put forward by Cabinet to justify any changes to processes.

Option c)

- 4.5 As set out in paragraph 4.1 of this report, legislation sets out what the Council is expected to do in association with neighbourhood planning. If Cabinet consider that further overview is required by them or Full Council of the decisions in making the Plan, then this can be addressed as set out in Option b). However, not proceeding in a manner consistent with legislation would potentially mean the Plan or Council could be subject to legal challenge and therefore is not the recommended option.

5.0 Stakeholder and ward member consultation and engagement

- 5.1 Consultation the Neighbourhood Forum has undertaken to date with stakeholders including with Ward Members is set out in the Kilburn Neighbourhood Plan Consultation Statement. Ward Members and the Cabinet Member for Regeneration, Planning and Property have been briefed in earlier stages and will be in subsequent stages.

6.0 Financial Implications

- 6.1 Some funds are available to the Council to support Neighbourhood Planning from Government. To date £10,000 has been awarded (following approval of the Forum and Neighbourhood Area) which contributed towards planning policy's revenue budget at that time. Historically, a budget has been available from MHCLG to support the costs of the examination and referendum (£20,000). If this budget remains available, a claim will be made, with the funds added to planning policy's revenue budget. The most significant cost to the Council will be the referendum (estimated to be £12,500 for Brent), with a smaller cost for the examiner's fee (£2.5k for Brent). Should the MHCLG grant not be available or if not able to cover the examination/referendum, the costs will be covered by revenue budget underspend related to current vacant posts.
- 6.2 The six 'project boxes' within the Neighbourhood Plan set out projects towards which Neighbourhood Community Infrastructure Levy (NCIL) funds might be directed. Final decisions on spending of NCIL funds are still made by the Council through the established NCIL process.

7.0 Legal Implications

- 7.1 All stages to date have followed the legislation and guidance when it comes to the preparation of neighbourhood plans. Given the relative uncontroversial nature of the draft Kilburn Neighbourhood Plan and the quality of the Plan, it is anticipated that the Council's role is effectively administrative, appointing an examiner, ensuring the forum takes account of the examiner's report and if necessary amends their draft Plan to be able to proceed to referendum. The Council will administer the referendum and if residents vote in its favour the plan can be 'made' and become part of the development plan for the borough.

8.0 Equity, Diversity & Inclusion (EDI) Considerations

- 8.1 The Equality Act 2010 introduced the 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.
- 8.2 There is a requirement for the Council to ensure that, in granting Neighbourhood Forum and neighbourhood area status, those applying are representative of the area covered. The Kilburn Neighbourhood Plan Forum have satisfied this requirement. An Equality Analysis Assessment was initially undertaken when the Neighbourhood Forum and neighbourhood area were designated which showed no adverse impacts. When the Kilburn Neighbourhood Forum applied for re-designation in 2021, the Forum's submission to the Council confirmed that those active in the Forum represent a wide range of residents and amenity groups, and they continued to attract new members from across the Neighbourhood Area.
- 8.3 The content of the Plan is a matter for Kilburn Neighbourhood Plan Forum. The Plan's focus on improving opportunities for Kilburn's population however is likely to ensure better outcomes for those with protected characteristics, particularly ethnic minorities who have very high levels of representation in the Neighbourhood Area.

9.0 Climate Change and Environmental Considerations

- 9.1 Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011) sets out 'basic conditions' that must be met by a Draft Neighbourhood Plan which include contributing to the achievement of sustainable development. A Kilburn Neighbourhood Plan 'Basic Conditions Statement' has been submitted to the Council which includes an analysis of the Plan's contribution to sustainable development against the National Planning Policy Framework (NPPF) Overarching Objectives. This identifies that the policies would contribute towards sustainable goals for example by encouraging the delivery of biodiversity net gain through greening initiatives in the public realm. Policy WK2 and Policy CK3 promote car free development, active travel and cycle parking in line with climate change action. Policy WK1 and Project box A encourage greening and street tree-planting while Project box B promotes delivery of a connected green corridor and a new linear park including new tree-planting.

10.0 Communication Considerations

- 10.1 The main engagement processes related to the development of the Kilburn Neighbourhood Plan have been set out in the stakeholder and ward member consultation and engagement section above.

Report sign off:

Alice Lester

Corporate Director Neighbourhoods and
Regeneration

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Kilburn Neighbourhood Plan 2023-2033





Kilburn Neighbourhood Plan 2023-2033

Draft Plan
(revised July 2024)

Contents

Table of Contents

1. Introduction 1

2. Kilburn past 3

3. Kilburn present 4

4. Kilburn future 7

5. A welcoming Kilburn 9

6. A characterful Kilburn..... 20

7. A distinct Kilburn..... 31

9. Next Steps 39

Appendix 1: Strategic Local Plan policies 41

Appendix 2: Kilburn’s Local Heritage 43

Acknowledgments 46

Foreword

Dear Residents,

The Kilburn Neighbourhood Plan presented here is primarily the product of Kilburn people's passion for and about Kilburn. Dating back to Roman times the Kilburn High Road, its centrepiece, is still a major highway and is also the local high street for people living in the surrounding estates and residential streets in the two Kilburn wards of Kilburn (Brent) and Kilburn (Camden). The challenges and opportunities associated with this unique situation together with the efforts to make sure Kilburn does not suffer as a result of sitting astride two local authority boundaries, has given rise to many initiatives in the recent past which have essentially been led by or has responded to the ambitions, energy, and creativity of the residents, businesses, communities, and other stakeholders.

Most significant is the work of the many Residents and Tenants Associations (RTAs) in the neighbourhood whose voices over the years have influenced policies and local decisions, ranging from objecting to planning applications for betting shops, payday lenders, and a surplus of fast-food shops to securing better-coordinated services, through, for example, neighbourhood policing or improved street cleaning.

In 2014 discussions around local organisations joining forces to become more effective in representing the views and concerns of residents and businesses led to the inception of the Neighbourhood Forum. We are pleased to say that those in the Forum's committee who have taken on the more detailed work to draw up the draft plan are involved in their Tenants and Residents Associations (TRAs) and other local organisations. This two-way channel is embedded through ongoing discussions, meetings, and walkabouts. The Forum's early work involved securing funding, training, establishing a website <http://kilburnforum.london/> Shaping the future of Kilburn— building up the Forum's membership and mapping the two Kilburn wards into the designated Kilburn Neighbourhood. Sadly, South Kilburn was not included because it already has a master plan although the residents and local businesses frequent the High Road and local service is kept in mind.

The committee has commissioned several research reports on which the Plan draws on and these are referenced on the website and listed in the Appendix. The Forum has also been fortunate in partnering with two universities and it has valued and drawn on the student project studies produced by Anglia Ruskin students in 2017 and the studies and presentations of UCL Bartlett School of Building students in 2022. This Plan aims to build on all these initiatives and Kilburn's palpable community spirit. We have tried to formalise the collective vision into policies for the Kilburn Neighbourhood and to record the ideas for transformative projects.

Some of the challenges to the neighbourhood are referenced in the Plan. Kilburn has a strong identity and is well-known to visitors both nationally and internationally, but it falls into two separate wards (Kilburn, Brent, and Kilburn, Camden) and the services of the councils especially across the High Road are often not well coordinated. The neighbourhood is remote from the Wembley Civic Centre and from Camden Council as well as being on the borders of Westminster Council, giving rise to a sense of marginalisation over the years.

People and communities have come and gone in Kilburn. Notably, there has been a strong Irish community and now Kilburn is known for its cultural diversity including Asian, Caribbean, and African as well as more recently Somali, Middle Eastern, and Eastern European communities.

At the same time, Kilburn High Road has had its fair share of current concerns about the demise of high streets but despite the high rents and rates, online shopping, and the impact of Covid 19, the High Road, against all the odds, remains stubbornly vibrant with a myriad of small businesses staying afloat. The Forum hopes to redress the loss of entertainment venues, the book shop, and even Further Education colleges. Looking to the future it aims to boost opportunities for high-quality green space and carbon reduction, linking to improved social and commercial experience, better health and wellbeing, and a more sustainable neighbourhood.

This neighbourhood plan presents a stronger focus on Kilburn providing a conduit for the people's determination to fight for the opportunities that this distinctive London neighbourhood deserves, with its architectural merits, long and varied history, its cultural diversity, and, most of all, its people.

We want to thank all those who have worked tirelessly to develop this Plan: the council planning officers who have advised and supported us, the professionals who have guided us in the protocol of developing neighbourhood planning as well as other neighbourhood planners, now increasing in thoughts, plans and projects to the discussions. But most of all we want to thank the people of Kilburn for readily sharing their views and ideas and spurring us on to find ways to get the very best for the Kilburn Neighbourhood which is crying out for some targeted support. We hope the enthusiasm for this ambition will grow and grow and more people will join the Forum to take forward the vision, its implementation, and community support.

Signed by The Kilburn Neighbourhood Plan Committee

Ajay Kumble	David Kaye
Donal McGraith	Elena Besussi
Francesca Murialdo	Linda Millar
Lloyd Fothergill	Lynda Stuart
Mary Arnold	Mahmud Rahim
Sally Dawn Holder	Paul Schulte

1. Introduction

A new plan for Kilburn

1.1 This is the Neighbourhood Plan for Kilburn (Fig 1). The Kilburn Wards of Brent and Camden form the core of the neighbourhood area and the entire frontage of Kilburn High Road except for the small section in the south that falls within the City of Westminster. The Neighbourhood Area does not include South Kilburn. Still, the designated area does include parts of Queens Park ward, namely Paddington Old Cemetery and a small area of Brondesbury Park Ward at the northern end of the High Road. According to the 2021 census the population of the area is approximately 22,300.

1.2 The Plan sets out the local community’s aspirations for Kilburn for the ten-year period 2023-2033 and establishes policies in relation to land use and development. These policies will influence future planning applications and decisions in the area. But the Neighbourhood Plan is much more than this. It represents the community’s manifesto for the Neighbourhood Forum, bringing together more than just traditional planning matters.

1.3 Kilburn was formally designated as an area for neighbourhood planning purposes (Fig. 1) and the Kilburn Neighbourhood Forum was established on 2nd June 2016 by LB Brent and 3rd June 2016 LB Camden. The Forum was renewed for a further five years in January 2022. The Kilburn Neighbourhood Plan Forum has surveyed, spoken to, and listened to members of the community. This has mainly been carried out through ongoing and regular contact with the local Residents’ Associations in both Brent and Camden plus via other local groups such as Transition Town and KOVE. The KNPF has used the issues, and opportunities, raised during that process to help inform the production of the policies and projects now presented in this draft Neighbourhood Plan.

1.4 There are a number of stages involved in preparing a Neighbourhood Plan. Following consultation, the Plan will be submitted to both Brent and Camden Borough Council for a further stage of consultation followed by an independent examination. Following this, a referendum will be held, where all registered people of voting age residing in the Neighbourhood Plan Area will be able to cast a vote on whether they think the Neighbourhood Plan should be brought into force (‘made’). If more than 50% of those who turn out vote ‘yes’, The Neighbourhood Plan will form part of the statutory development plan and be used to help determine planning applications in the Kilburn Neighbourhood Area.

- Section 3: ‘Kilburn present’, provides an overview of the area covered by the draft Neighbourhood Plan, what existing planning policy says for the area, key issues, and comments raised during consultation.
- Section 4: ‘Kilburn future’, presents the vision and objectives for the Plan area.
- Sections 5 – 8: These sections present the policies and associated projects for Kilburn. These are presented on a spatial basis, reflecting the different characteristics and qualities of the area.
- Section 9: Summarises the next steps in the plan-making process

Structure of the Plan

1.5 Following this introduction the draft Neighbourhood Plan comprises seven further sections. These are

- Section 2: ‘Kilburn past’, briefly presents the ‘story’ of Kilburn.

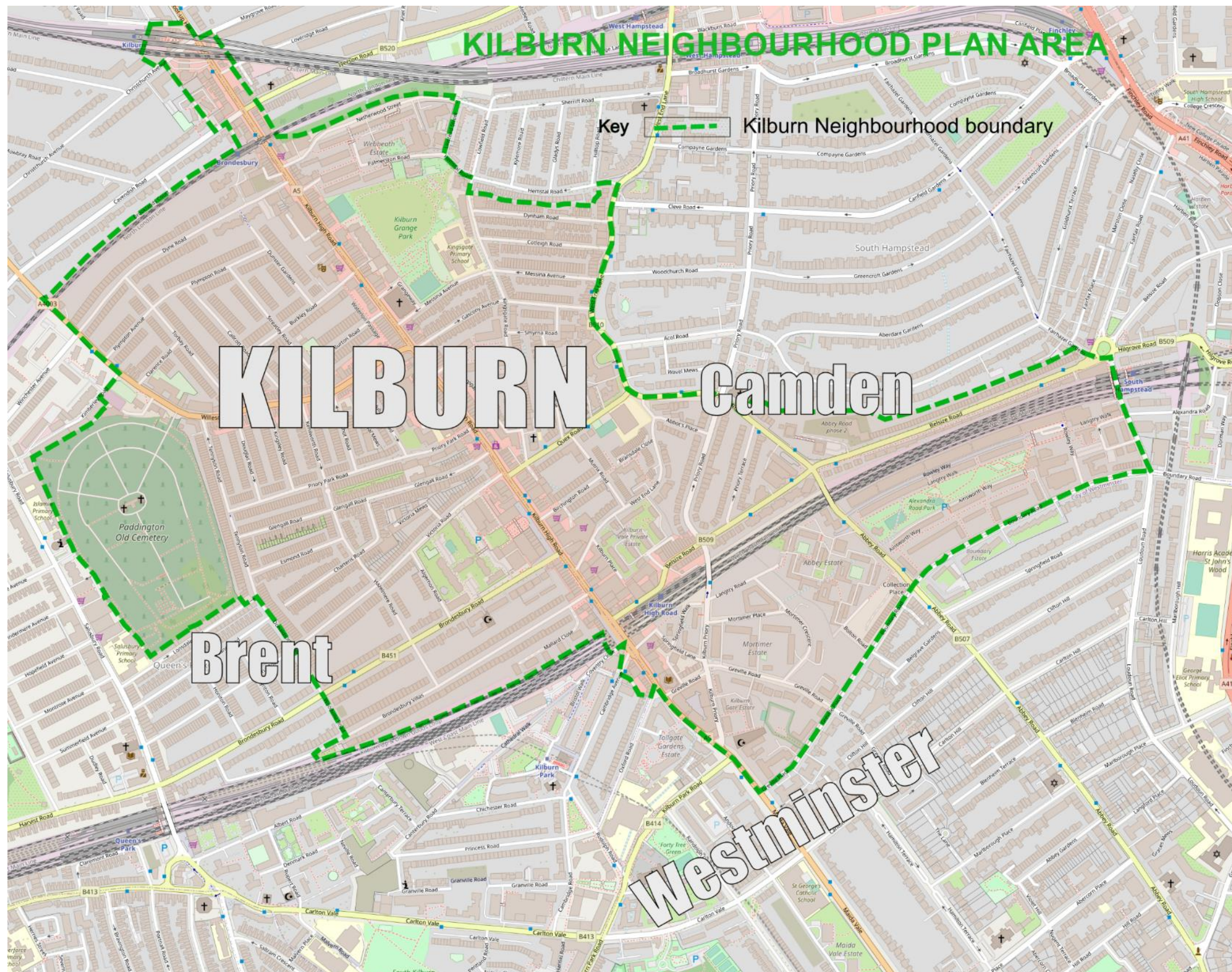


Figure 1. The designated Neighbourhood Plan area for Kilburn

2. Kilburn past

2.1 Kilburn has old roots. Starting as a Celtic trackway, Kilburn High Road was paved by the Romans in 47 CE becoming an important part of the Roman Road running from Dover, through London and on to Wroxeter and Chester. Travelled by Roman Emperors and Boudica, known by the Saxons as Watling Street, Kilburn High Road retains its importance as a major thoroughfare, as part of the A5 which runs from London to the port of Hollyhead.

2.2 The original hamlet was built on the banks of Kilburn Brook, called “Kilbourne” by the Saxons, along whose flood plain settlement developed. There are certainly Roman remains near the High Road. Kilburn Priory was founded around 1134 and stood to the early 18th Century 11th century hermit and evidence of a mediaeval priory for pilgrims.

2.3 In 1714 a spring was discovered near the Old Bell public house. By the 18th century Kilburn Wells as it was known, had become a famous health-giving spa and resort area of some repute. Major expansion of Kilburn occurred in the 19th century with rapid construction of much of today's urban landscape, supported by extending networks of suburban railways and (originally horse-drawn) omnibuses. By the end of the 19th and start of the 20th Century Kilburn was a bustling centre of light industry, shopping, entertainment and hospitality. It was well known for its furniture shops whilst its fabric and clothes shops rivalled the West End. As the centre of the Irish community in London, it was much associated with music, theatre and dance, although all kinds of modern music were performed along the "Music Mile " of the High Road and Cricklewood.

2.4 But after World War II the district went into progressive decline, with closures, or clumsy conversions, of cinemas, pubs, music venues, and department stores. The Council's development of Kilburn Square in the early 1970's resulted in a problematic two-story shopping centre connected by a, short lived, elevator, by the 2000's it was something of an eyesore.

The opening of Brent Cross shopping centre in 1976 started the long-term decline in the quality of the retail provision on the Kilburn High RD especially in the loss of a number of the larger department stores.

There was an uptick in the retail provision with the opening of TK Maxx Aldi and Sports Direct in (2010s) but the challenges of online shopping are a cause for concern. Sadly, the last significant music venue, the Good Ship, closed in 2018.



Figure 2: Historic Photos of Kilburn (source: We Made That for KNPF, taken from Brent Archives and Historic England)

3. Kilburn present

The neighbourhood plan area

3.1 The Neighbourhood Plan area mostly conforms to that of the two Kilburn Wards, Kilburn (Brent) and Kilburn (Camden), with minor adjustments made to include Paddington Old Cemetery, which is in Queens Park Ward and Kilburn Underground Station, which is in Brondesbury Park Ward but to exclude the South Kilburn as this growth area has its own designated Masterplan. There have been minor changes to Ward boundaries in 2022 but these have not had any significant impact on the Neighbourhood Area.

3.2 This area defines what most people recognise as Kilburn. It is focused on the High Road and residential areas found on either side of this. The residential areas are predominantly of Victorian housing stock, along with some significant areas of social housing. The area also features key social and community infrastructure including open space, schools, health centres, community centres, and places of worship. These include, but are by no means limited to:

- The Gaumont State cinema, a Grade II*listed art deco building, formally a cinema and music venue, now a place of worship.
- The Kiln Theatre (formerly the Tricycle Theatre) is a theatre of national significance.
- The Black Lion - a Grade II* listed public house/restaurant.
- Kilburn Grange Park - the most significant active recreational space in the area,
- The Institute of Contemporary Music and Performance (ICMP)
- Paddington Old Cemetery: mid-Victorian cemetery, a Grade II listed park and garden with a Commonwealth War Graves Cemetery. The 23-acre grounds contain over 500 trees, a wildflower meadow, and an apiary. In addition, it includes a Grade II-listed chapel complex and Grade II-listed grave monument.
- Community Centres include Abbey Community Centre and Charteris (Kilburn) Sports Centre. Kilburn Housing Co-op Community Hall, Quex Road Sacred Heart Catholic Church, a number of places of worship, and schools including Kingsgate Primary school.
- See a more comprehensive list, table 2 page 37.

3.3 It should be noted the Plan Area contains two significant green spaces, the largest being Paddington Old Cemetery followed by Kilburn Grange Park. The Plan area also contains a range of smaller open spaces, such as the pocket park on Streatley Road, the Iverson Rd Play Space, and the Alexandra and Ainsworth Estate walk which contributes to the green infrastructure network. In addition, Maygrove Peace Park, slightly beyond the Plan Area, is within easy walking distance, and therefore an underused and underappreciated additional asset.

3.4 The area straddles the boundary between the Boroughs of Brent and Camden, whose boundaries run directly down the Kilburn High Road. Part of the southern edge of the Plan area follows the borough boundary with Westminster. Kilburn is now an area of

London in need of “levelling up” as the two councils have already jointly acknowledged in 2022 by designating it a Community Improvement District (CID). Although it still remains a vibrant centre with a wide mix of uses and is a place that serves local shopping needs as well as attracts visitors, the need to overcome “creeping decline” and recapture the district's past attractiveness and quality of life is widely felt locally.

3.5 The area benefits from excellent public transport accessibility. The stations at Kilburn, Brondesbury, Kilburn High Road, and South Hampstead provide access to the Overground, underground, and rail services to Euston and Watford. The High Road is the main bus thoroughfare providing nine services linking Kilburn with Camden, Victoria, Chelsea, Earls Court, Neasden, Shepherds Bush, Golders Green, and Edgware.

3.6 The Neighbourhood Plan Area contains fifteen listed buildings and in addition twenty-two locally listed buildings (see pages 42 and 43) The Plan area overlaps with a number of conservation areas. In Camden, the area overlaps with South Hampstead, South Kilburn, Priory Road, St. Johns Wood, and Alexandra Road conservation areas.

In Brent, the neighbourhood area overlaps with parts of Paddington Old Cemetery, South Kilburn and North Kilburn Conservation Areas. Brent is due to consult on the extension of the Kilburn and North Kilburn conservation areas to include the shopfronts on Willesden Lane, an area within the town centre, and the residential area between Willesden Lane and Victoria Road.

The development plan

3.7 Neighbourhood Plans must be prepared in line with national guidance and legislation including the Localism Act (2023), the Neighbourhood Planning (General) Regulations (2012)¹, the Neighbourhood Planning Act, the National Planning Policy Framework (NPPF) (2023) and National Planning Practice Guidance (NPPG).

3.8 Neighbourhood Plans must be in general conformity with the strategic policies of the development plan. Since the Neighbourhood Plan area for Kilburn falls under two boroughs, the development plan for Kilburn encompasses the relevant policies under both the Brent and Camden Local Plans. This Neighbourhood Plan must also be in conformity with the London Plan.

3.9 Of particular relevance to Kilburn, the London Plan establishes an approach to ‘Good Growth’, which is about creating a more socially inclusive city that improves the health and well-being of all residents. It seeks to provide choice and opportunity for all, reflected in a mix of housing types, employment opportunities, community facilities, and an approach to ‘healthy streets’ that makes it safe and easy for all to get around. Good Growth is also underpinned by a response to the climate change agenda, aiming to make London a cleaner and greener place for all. It seems to strengthen the character and identity of

¹ Updated in 2015 and 2016

London's neighbourhoods and which is reflected in the built form as well as cultural diversity.

3.10 The London Plan has set a challenging 10-year (2019/20 – 2028/29) housing target for Brent and Camden of 23,250 and 10,380 homes respectively. Furthermore, the introduction of, for the first time, a 'small sites' housing policy (Policy H2: Small Sites), means the London Plan supports incremental intensification of existing residential areas located in highly accessible, sustainable locations, such as Kilburn. This is expected to play an important role in contributing towards the 10-year small sites targets, which are 4,330 and 3,280 homes for Brent and Camden respectively². Small sites are those which are less than a quarter of a hectare in area.

3.11 The London Plan identifies Kilburn as

- A 'major centre' in its network of town centres, which are places that should be the focus of higher-order comparison goods retailing, as well as places where higher-density mixed-use development might be appropriate.
- An area whose night-time economy is of more than local significance. These are places that draw visitors from elsewhere and tend to feature smaller venues and premises. In such places, the needs of local residents will need to be carefully balanced with the economic benefits of the night-time economy.
- An area with low growth potential for commercial uses and thus where best use should be made of existing development opportunities and accessibility, whilst reflecting physical and environmental constraints.
- An area with medium growth potential for residential development.
- An area with some demand for existing office functions, but generally within smaller units.

3.12 A new Local Plan for Brent was adopted in 2022, covering the period up to 2041. The Camden Local Plan was adopted in 2017 and covers the period to 2031. Camden are consulting on a draft local plan (2023) The Neighbourhood Plan has been drafted to cover the period 2023-33, in line with the Camden Local Plan and the first ten years of the Brent Local Plan, with reviews planned to take place in line with the re-designation of the Forum to allow for updates to be made to cover later Plan periods. As far as is relevant, it refers to and utilises technical evidence prepared in support of the Local Plans for both Boroughs, all of which can be accessed via the Brent and Camden websites³.

3.13 The strategic policies of relevance to Kilburn as contained in the Brent and Camden Local Plans are summarised in the appendix 1 (Strategic Policies). Once 'made' the Neighbourhood Plan will play an integral role in setting out the non-strategic policies for Kilburn that will be used to determine planning applications in the area.

3.14 Of particular note, the Brent Local Plan establishes a housing requirement for the 'Brent part of the neighbourhood plan area, being 348 homes over the period to 2041. These additional homes are likely to come forward as windfall developments on small sites, and are not allocated for development in the Local Plan. Equally, the Neighbourhood Plan does not seek to allocate land for development. Rather, it is recognised that proposals for development will come forward and that the nature of many small schemes, often involving

conversion and sub-division for example, means that it will not be possible to identify all such sites. Instead, the Neighbourhood Plan takes a more pragmatic approach, establishing design guidelines and principles to help shape future development such that it responds to and helps reinforce local character and identity.

3.15 The Brent Local Plan also supports the establishment of a new creative cluster in Kilburn and seeks to enhance and protect the evening economy and comparison retail offer. Similar policies in respect of the town centre economy are contained within the Camden Local Plan.

Wider initiatives

3.16 In September 2021, Camden Council announced a new crowdfunding initiative to support its high streets. The Camden Future High Streets Crowdfunding programme is run in partnership with the civic crowdfunding platform Spacehive. It seeks to fund the delivery of innovative, forward-thinking projects that support the re-imagining of our high streets and recovery for a sustainable future. Camden's Evening and Night Time Strategy was approved in February 2024

3.17 Camden Council has allocated up to £360,000 to the crowdfund, with up to £35,000 per project (covering a maximum 50% of project costs) available to help selected successful projects who manage to get wider support.

3.18 In December 2021 Camden Council secured £155,000 of funding from the Mayor of London's High Streets for All Challenge to help create and deliver improvements for Kilburn High Road. This followed a previous successful bid for £20,000 funding to develop ideas with the community.

3.19 The High Streets for All Challenge is an invitation to local partnerships to bring forward and co-design innovative high street recovery strategies and proposals. Each strategy can address common and local challenges and underpin the public re-imagining of high streets and town centres across London. Strategies can support actions across an entire high street or focus on an innovative exemplar high street recovery project.

3.20 This funding will enable Camden to work with local organisations, including Brent Council, to deliver projects which will help Kilburn's centre to flourish and thrive, including building local partnerships, bringing vacant spaces in Kilburn back into use, and using art to celebrate the vibrancy and diversity of Kilburn High Road.

3.21 'Current' projects are set out below and will be updated over time

In 2021, Brent Council made available £2.5m Business Support Funds to support its town centres to recover from the pandemic. During 2022-23 this delivered practical support for Kilburn businesses including £122,000 for hardship grants, digital skills training, visual merchandising consultancy work, new bins, shopfront improvements, shutter art and a Kilburn Fringe event to support hospitality recovery.

² Note: The Small Sites target forms part of the overall housing target for the boroughs, rather than being in addition to this.

³ Brent: <https://www.brent.gov.uk/planning-and-building-control/planning-policy-and-guidance/> and Camden: <https://www.camden.gov.uk/web/guest/evidence-and-supporting-documents>

- Kilburn Up High: a joint project Brent and Camden Council art project working with local artists and residents to design a public mural for Brondesbury Bridge on Kilburn High Road
- Fit out of 2c Maygrove Road to create space for community uses and projects that support the high street (temporary use).
- Library of Things for Kilburn (Kilburn Library - Camden).
- Funding to support work to scope future uses for 107 Kingsgate Road (Kingsgate Community Centre).

3.22 Camden has also been successful in securing one of the two opportunities to work with Power to Change to scope a Community Improvement District (CID) for Kilburn. The Neighbourhood Plan aims to align with the objectives of the CID to achieve greater involvement of communities in the oversight and revitalisation of its high street. It is defined as “a non-political and inclusive structure, open to residents, businesses and other local stakeholders, concerned with the economic, social and environmental improvement of their neighbourhoods.”

3.23 Brent and Camden are collaborating on an evening and night time strategy for Kilburn. Camden will produce a borough wide strategy and then work with Brent to bring forward a joint local strategy for Kilburn.

3.24 Brent and Camden submitted a major bid to round two of the Government’s Levelling Up Fund in July 2022 for public realm upgrades throughout the town centre, additional greening initiatives (including pocket parks) and refurbishment of Kingsgate Community Centre. This was unsuccessful, but Brent and Camden will use their match funding to progress a smaller public realm and decluttering scheme for the north of the High Road. A new bid will be resubmitted to the next Levelling Up Funding round.

4. Kilburn future

What the community told us

4.1 The various consultation exercises undertaken identified a range of issues of importance to the draft Neighbourhood Plan.

- The **width and quality of the public pavement** varies significantly within the Neighbourhood Plan Area. The perception of what was considered acceptable also differed, with some comments from the consultation reporting difficulties to navigate with a buggy without causing an obstruction whilst many referenced potholes, obstructions, and the “neglect” of the pavement.
- Concern was expressed about the general **quality and appearance of the High Road**, both in terms of the public realm and buildings along this, as well as personal safety along and in the area.
- **Road safety on the High Road** in general emerged as a concern through consultation. Particular junctions such as Coventry Close were highlighted as too close to other entry/ exit points, whilst others identified particular sections between Kilburn Station and Quex Road as being in need of resurfacing.
- Throughout the consultation, particular land uses were criticised as dominating the Kilburn area and impacting the overall character of the area. The most frequent land uses identified were the perceived **proliferation of betting shops, hot food takeaways and payday loan outlets**.
- There was clear support in the consultation **for improving the current market offer**, including calls for additional provision but also improved choice and quality within the existing arrangement.

- Throughout consultation there was **support for, and request for maintenance of, murals** such as that outside of Kilburn Tube Station or the artwork at the Webheath estate.
- There were concerns emerging from the consultation that there is a **lack of activities for young people**.
- There was a significant concern raised over **the impact of Kilburn’s administrative boundaries**. In a simplistic sense, this leads to difficulties with administration and planning policy but also with statistics, monitoring, and enforcement. As it currently stands, this leads to a propensity to talk of ‘two Kilburns’; with references throughout the consultation to the “Brent side” or the “Camden side” and largely unsubstantiated comparisons between the two.

Full details will be set out in our Consultation Statement.

4.2 Some of the matters outlined overleaf are covered in the Local Plans prepared by Brent and Camden respectively. It is not for the Neighbourhood Plan to repeat or duplicate these. Instead, the Neighbourhood Plan develops these further as appropriate to reflect local matters and, although some of the issues outlined above are not strictly ‘land-use planning policy’ matters, they do reflect the community’s concerns and hopes for the area and are embedded in this Neighbourhood Plan through a combination of the vision and supporting projects. They are ideas that will need developing and exploring further with other organisations and delivery partners but are those towards which any funding is made available through the ‘neighbourhood portion’ of the Community Infrastructure Levy . Whilst the KNPF will focus on NCIL We will also consider funding more generally, eg. the Brent Health Matters and Wellbeing Grant and other funding sources available from time to time.

Vision

4.3 This section of the Neighbourhood Plan sets out the vision for Kilburn. It has been informed through consultation and establishes the community’s aspirations for the future of the area

Our vision is for Kilburn to evolve, modernise and prosper

Kilburn will remain a distinctive and important part of London, an area that stitches together a community divided by an administrative boundary. The character of Kilburn shall be strengthened, reflecting its rich legacy of architectural quality, vibrant social and commercial life, and cultural identity.

New development on the High Road will consistently embody high standards of design while preserving and enhancing local character.

Kilburn will be a bustling, commercially thriving, urban hub, important and well recognized by both Brent and Camden, which appeals to the diverse communities living in, visiting, and shopping in the area and facilitates, supports and sustains everyday needs. Whilst, reflecting Kilburn's history as a 'music mile', creative and cultural activities and artworks will continue to flourish.

Highly visible public realm improvements will systematically contribute to a more pedestrian-friendly High Road, encouraging social interaction, and featuring varied and convivial cafés, pubs, and restaurants. They will offer and attract different cultures and cuisines (while maintaining some indigenous original British establishments) and improve the quality and range of the retail, entertainment, and hospitality sectors, with a greater joint appeal to visitors. Coordinated renewal will have attracted new businesses, enhancing the setting and experience of the 'string of pearls along the High Road, including an impressively modernised and iconic Kilburn Square commercial and residential complex, a revived, refurbished, and community friendly Gaumont Cinema site, the Kiln arts theatre and restaurant venue, and existing and new outdoor markets.

There will be an appropriately generous provision of facilities such as public lavatories and seating areas for older visitors and residents. Disabled access to transport, hospitality, and shopping will be examined and improved.

The Kilburn High Road and its adjacent streets will be cleaner and will feel safer.

Drainage will also have been improved so that Kilburn and its streets are no longer subject to disruptive and unhealthy flooding.

A programme of street greening instigated along the High Road and extending into green corridors in side streets will help create an appealing environment for people to walk, cycle, and spend time and help link the High Road with surrounding communities, public transport hubs and routes, and green assets, including Grange Park, and Paddington Old Cemetery.

Objectives

- 4.4

The objectives presented below build upon the vision and provide a framework for policies in the Neighbourhood Plan.
- 4.5

It is important to note that not all of these will strictly comprise land use and development matters, but do present the wider ambitions of the community and which are important to express as the community’s manifesto for the area. As such, the Neighbourhood Plan comprises a combination of policies and projects/aspirations.

Objective 1: ‘A welcoming Kilburn’
To enhance the experience of the High Road for all, by improving the public realm, access to and movement along it.

Objective 2: ‘A characterful Kilburn’
To promote high levels of design that respond to the local character and existing high-quality architecture.

Objective 3: ‘A distinct Kilburn’
To preserve, enhance and promote the distinct identity and heritage of Kilburn.

Objective 4: ‘A coordinated Kilburn’
To present a coordinated voice and Governance structure to oversee the continuous improvement of the Plan area.

- 4.6

The policies, and projects, within this Neighbourhood Plan intend to deliver on the vision and objectives outlined above. Sections 5 - 8 of the Neighbourhood Plan present these, ordered in response to the objectives.
- 4.7

It is important that the Neighbourhood Plan is read as a whole. All policies should be viewed together, and alongside the wider development plan, in the preparation and consideration of planning applications. (Refer to 3.8)
- 4.8

For the avoidance of doubt, within sections 5 – 8, each topic area includes some introductory and explanatory text, followed by one or both of the following: –

Policy box

Within a Neighbourhood Plan, policies must be related to ‘land-use’ and development matters, and can be created for any proposals or form of development requiring planning permission. Developments and interventions that do not require planning permission are not covered by policies, but can be addressed through wider projects and aspirations (see below). The draft Neighbourhood Plan establishes land use and development management policies for Kilburn. These are contained in green shaded policy boxes, like this one. These cover matters where planning permission is required for development to take place.

Project box

The draft Neighbourhood Plan covers more than just traditional planning matters as it presents the community’s vision for the area. Items that the community are seeking, but that cannot be delivered through planning policy, are identified and contained in blue shaded project boxes, like this one. For clarity these do not form part of the formal plan for decision making purposes. These are included within the body of the report, rather than being presented in a separate chapter or appendix, because they relate to the objectives and form a clear and important part of the story. They are ideas that will need developing and exploring further with other organisations and delivery partners, but are those towards which any funding made available through the ‘neighbourhood portion’ of the Community Infrastructure Levy might be directed and other sources of funding such as the Brent Health Matters and Wellbeing Grant.

Reviewing the Neighbourhood Plan

- 4.9

Notwithstanding the defined period of the Neighbourhood Plan to 2033, it is recognised that, with the adoption of the Brent Local Plan (Feb 2022), the London Plan (March 2021) and the review of the Camden Local Plan, the Neighbourhood Plan will need to be reviewed periodically. This will enable the Neighbourhood Plan to remain ‘current’ and in conformity with the Local Plan and National Planning Policy Framework.

5. A welcoming Kilburn

- 5.1

This chapter is framed around the following objective:
Objective 1: To enhance the experience of the High Road for all, by improving the public realm, access to and movement along it

5.2 It presents policies and projects that build upon the following set of ideas and initiatives identified through work on the Plan:

- a. This section of the Neighbourhood Plan refers to the quality of the public realm. The public Realm is defined, in the London Plan for example, as all the publicly-accessible space between buildings, whether public or privately owned, from alleyways and streets to squares and open spaces
- b. To increase the 'green factor', clean air and cleaner streets and reduce noise in Kilburn by promoting de-cluttering and the introduction of landscaping and public realm improvements along the High Road. These may include street tree planting and rain gardens, enhancing the attractiveness of the urban landscape and creating a connected network of green spaces linking increased numbers of well-maintained streets, together with parks, including micro or pocket parks, such as those along the eastern ends of Maygrove and Iverson Roads, and the western end of Priory Park Road.
- c. To improve the arrival experience at key transport nodes along the High Road by creating memorable and attractive gateways into Kilburn, including the arches, murals and Brondesbury Mews at the north end and signage/ wayfinding and heritage boards at the Maida Vale end.

The pedestrian environment

5.3 To enhance the quality and amount of pedestrian space that better balances its walkability and the 'movement' function of the High Road with its important 'place' function, including spaces that support and emphasise the importance of key activities and uses along the High Street.

5.4 Kilburn High Road is a route of strategic importance, forming part of the historic link from central London out through Hertfordshire and, eventually, to Holyhead. It has a significant 'movement' function but at the same time, is an important place for local services and community interaction. The challenge for the High Road is thus balancing these competing roles. Unfortunately, the High Road has one of the highest

'harm rates' in London with 112 casualties over a three-year period. At the same time, the Neighbourhood Plan area is a diverse residential neighbourhood with numerous community facilities and services, where people of all areas and abilities should be able to move around safely and easily.

5.5 The London Plan supports the concept of 'Healthy Streets'. The Healthy Streets Approach uses ten evidence-based indicators of what makes streets attractive places, including, for example, clean air, streets that are easy to cross, places where people feel safe, where they can stop and rest.

5.6 There have been campaigns recently to improve the quality of experience on and near the High Road, particularly for elderly residents and visitors by the increased

provision of benches and other suitable seating. The Neighbourhood Forum notes that considerable time and energy was put in by KOVE to increasing the number of benches on both sides of the High Road and supports a further increase in these facilities

5.7 The Neighbourhood Forum also supports the provision of toilets on or near the Kilburn High Road and other appropriate places. It is noted that KOVE has particularly identified Kilburn Grange Park and Hampstead Cemetery (out of the Plan Area) as important and appropriate sites. It should also be noted that for many years the toilets on Willesden Lane have been closed and the buildings have fallen into disrepair but as they are in private ownership their use remains problematic. It is particularly stressed that any plans for providing toilet facilities must include financial support to enable them to be reliably open, welcoming, visible, clean, and well-maintained.

5.8 The CABI Paved with Gold report⁴ revealed the quality of Kilburn High Road to be relatively poor in comparison with similar urban areas across London, using an assessment method to assess street quality from the point of the pedestrian. Consultation comments made through the Neighbourhood Plan, combined with support surveys and evidence, reveal that the quality of the public realm along the High Road remains a pressing concern.

5.9 Work on the Neighbourhood Plan reveals that Kilburn High Road suffers from inconsistent or misplaced street furniture and poor-quality pavements which impedes pedestrian flow. There are a significant number of bollards that compound the competing street interests and small pavements, further complicating the space rather than facilitating movement. This is not to imply that the bollards are not performing a useful purpose, but there are examples where multiple bollards and lighting columns could be rationalised.

5.8 The Better Streets Delivered report⁵ lists 'tidy up' and 'de-clutter' as two of the main actions that people and organisations can use to achieve better streets. The 'tidy up' actions look to remove unnecessary road markings or broken street furniture which is simple to clear up and will not damage the footway. The 'declutter' action requires a more strategic justification for every individual piece of equipment in the street, with the presumption of removal unless a clear reason for retention is given. The tidy-up and de-clutter approach towards Kilburn's public realm should be used in all relevant schemes.

5.9 Some retailers within Kilburn provide areas of outdoor seating and independent retailers sell goods outside as extensions to their shop; all of which can add to the vibrancy of the shopping environment. However, it is recognised that this

can often come at the expense of the public realm which varies across Kilburn. Street trading and seating should generally be encouraged where appropriate. However, it should not cause an obstruction to pedestrians or a nuisance to neighbouring residential occupiers. To prevent conflict, forecourts should be clearly delineated from the main pavement, allowing sufficient space for the free flow of pedestrians

5.10 Kilburn also has a number of leftovers, underutilised spaces. These spaces can have a significant detrimental visual impact on Kilburn's public realm. A series of potential intervention areas have been identified, currently being underutilised and suitable for

⁴ CABI: Paved with Gold (2007)

⁵ Better Streets Delivered 2013, Transport for London

intervention (Figure 3). It should be noted that these are examples of the main ones and the observant visitor can find many underused and unnoticed spaces (such as between buildings and bridges) which should be considered for imaginative and innovative uses.

5.11 Public art installations or lighting should be considered for spaces that have existing problems in visibility and perceived security. Good lighting can encourage more people to use leftover spaces and can complement other connectivity and aesthetic improvements across the area.

5.12 Revitalisation of these spaces linked to development opportunities will be supported, including the creation of new active fronts onto these spaces. Meanwhile uses and pop-ups that make use of the space before such a time as they are redeveloped or reconfigured as part of wider development projects will be supported.

5.13 Other opportunities for Kilburn's leftover spaces include pocket parks and parklets. The term 'pocket park' can be used to describe small spaces in the public realm that can be greened to offer an area for rest or recreation. Pocket parks challenge the common perception of what a park can be. They can range from the traditional town centre green to making better use of unusual spaces, such as underused pavement areas, parking spaces, rooftops, or uninspiring green spaces associated with bus stops or road junctions. Parklets make use of highway spaces for seating and greening. The introduction of pocket parks would provide Kilburn with valuable spaces for the High Road's users to pause, socialise and appreciate their surroundings.

5.14 There is also the potential to introduce mobility hubs in Kilburn, utilising and making better use of unused spaces. Mobility hubs are highly visible, safe, and accessible spaces where public, shared and active travel modes (e.g.: bike and scooter hire and other micro-mobility solutions) are co-located alongside improvements to the public realm and, where relevant, other community facilities. Mobility hubs allow space to be reorganised for the benefit of pedestrians, cyclists and business owners addressing parking problems and creating a more pleasant urban realm. Where such hubs are to be provided, they should be designed to avoid conflict between users of different transport modes, and where any technology or cabling associated with e-vehicles or similar is incorporated, should avoid causing obstruction or hindrance to pedestrian movement. In line with TfL's policy, mobility hubs should ideally be limited to active travel modes and caution should be taken when combining this with the provision of EV charging points and car club vehicles. They could attract additional traffic into unsuitable locations and may detract from conditions for people who are walking, wheeling or cycling.

Green infrastructure

5.15 Kilburn High Road has some of the highest air pollution levels in London and is designated as an Air Quality Focus Area (AQFA) (Figure 4). Although the Neighbourhood Plan area as a whole is one that is relatively green, with several high-quality green spaces and residential streets lined with mature trees, the same is not true of the High Road where there is a lack of greenery (Figure 5).

5.16 Efforts need to be made to increase the 'green factor' of the High Road and to encourage and support an increase in local trips made by foot, bicycle, and public transport. This in turn will contribute towards achieving cleaner air, cleaner streets, and a more attractive, socially inclusive High Road. The greening of the High Road would also help complete the green infrastructure network across the Neighbourhood Plan area, connecting Paddington Old Cemetery with Grange Park for example via a network of connected green streets.

5.17 These improvements can come in a variety of forms, including the planting of new street trees. Bioretention areas (more commonly known as rain gardens) can also be retrofitted into busy public highways. These are shallow landscaped depressions that are typically under-drained and rely on engineered soils, enhanced vegetation, and filtration to remove pollution and reduce runoff.

5.18 Introduction of Bioretention areas would also help address localised flooding risks by managing surface water runoff in a way that mimics natural processes, slowing down the runoff rate while providing wider benefits. While Kilburn does not suffer any flood risk from rivers, apart from Kingsgate Place where the former water course of the Kilburn stream 1 has flooded in the past, other areas do have a significant threat from surface-level flooding (Figure 6).

5.19 The wider benefits of such schemes include improving the aesthetic of the public realm and streetscape to provide enhanced pedestrian safety with rain gardens acting as defensible spaces to footways. They also contribute towards biodiversity net gain and reduce atmospheric pollution through the uptake of particulates.

5.20 The Forum supports the introduction of street tree planting and rain gardens along the High Road and elsewhere in the neighbourhood plan area as appropriate and where they can help manage climate change and the risk of surface water run-off. These would be most suitable in areas where the road network is unnecessarily wide. Green infrastructure solutions can therefore be integrated into Kilburn's streetscape without negatively impacting on the primary function of our streets and spaces.

5.21 For Kilburn, the introduction of this infrastructure represents an important opportunity to interconnect the high-quality green spaces and features that are present throughout the neighbourhood but have sadly been neglected along the High Road itself (Figure 5). [1 https://en.wikipedia.org/wiki/River_Westbourne](https://en.wikipedia.org/wiki/River_Westbourne)

5.22 As green infrastructure provides a wide range of benefits, it is one of the most cost-effective ways to contribute towards meeting the environmental and social

requirements of the London Plan, Mayor’s Transport Strategy and London Environment Strategy.

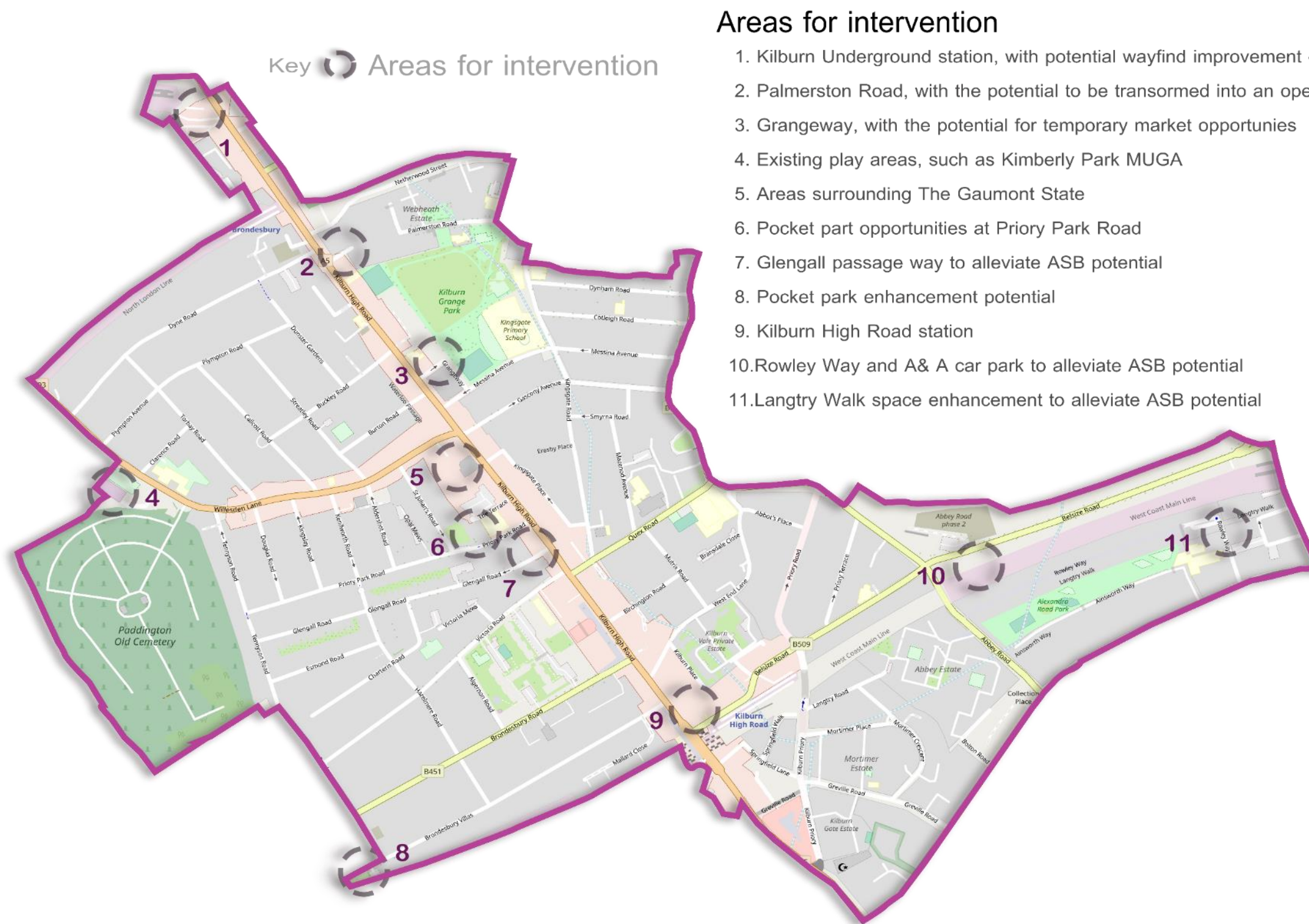


Figure 3. Areas for intervention

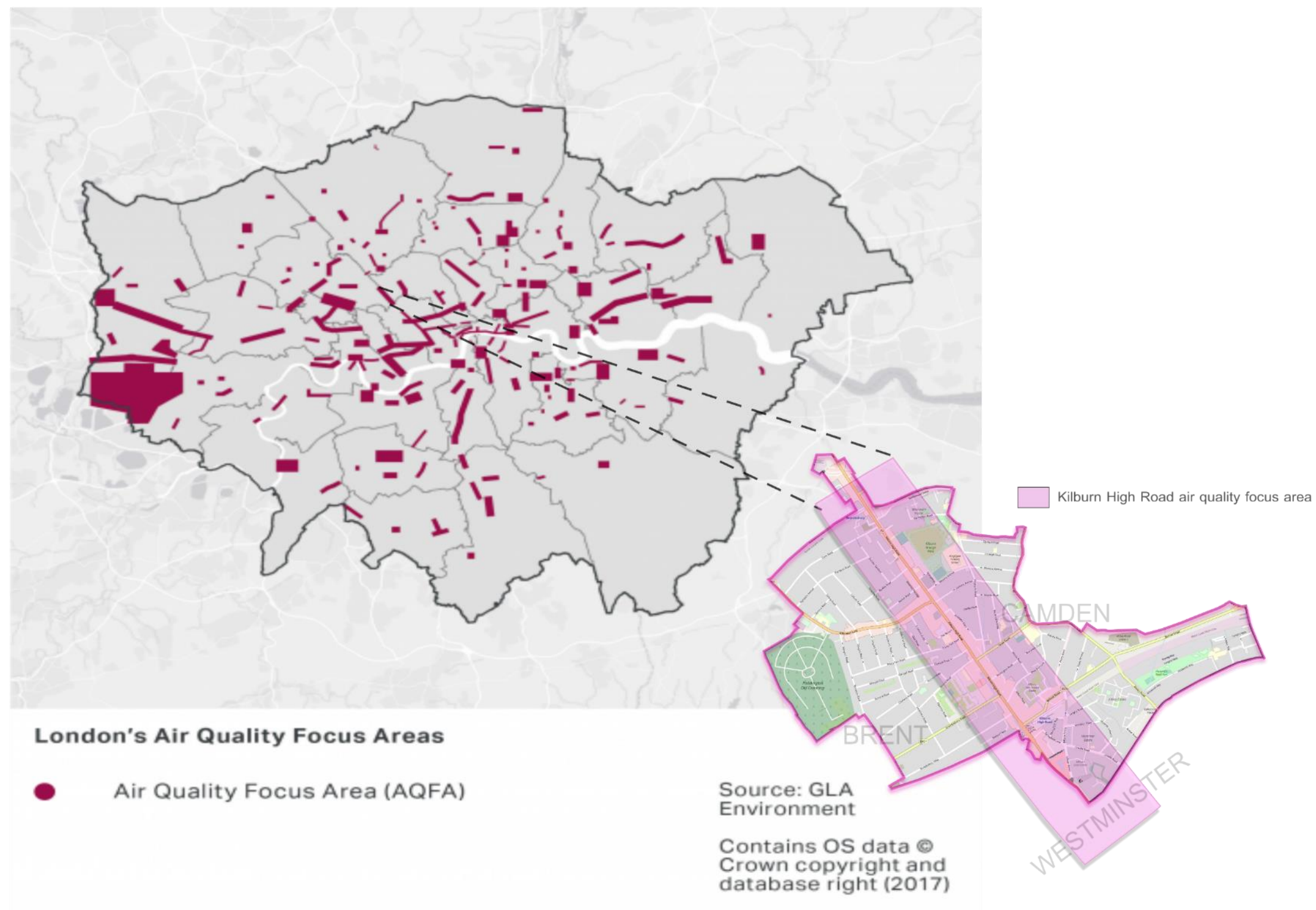


Figure 4. Kilburn Air Quality Focus Area

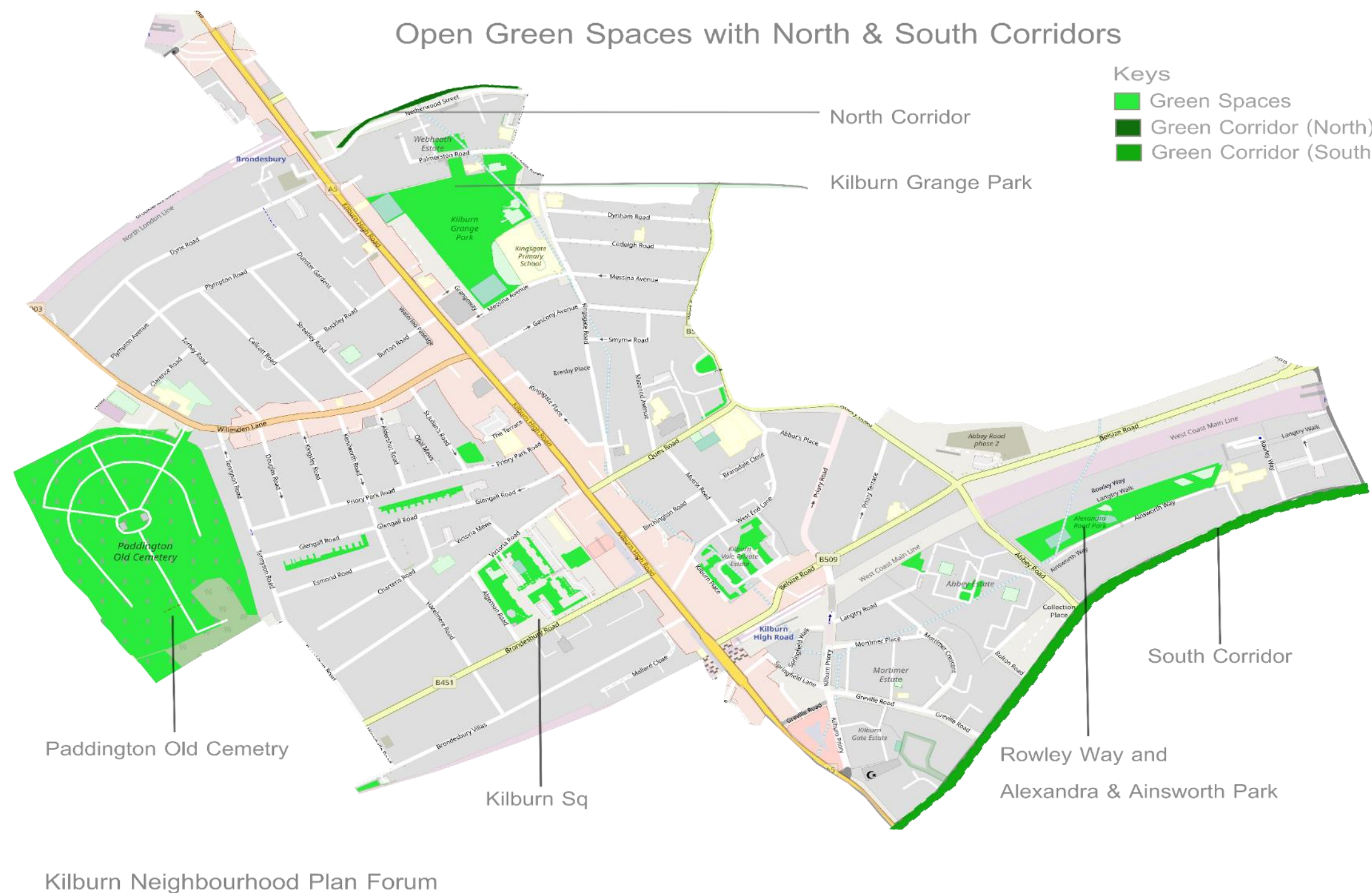


Figure 5. Existing green infrastructure across the Neighbourhood Plan area, indicating a lack of greenery along the High Road.

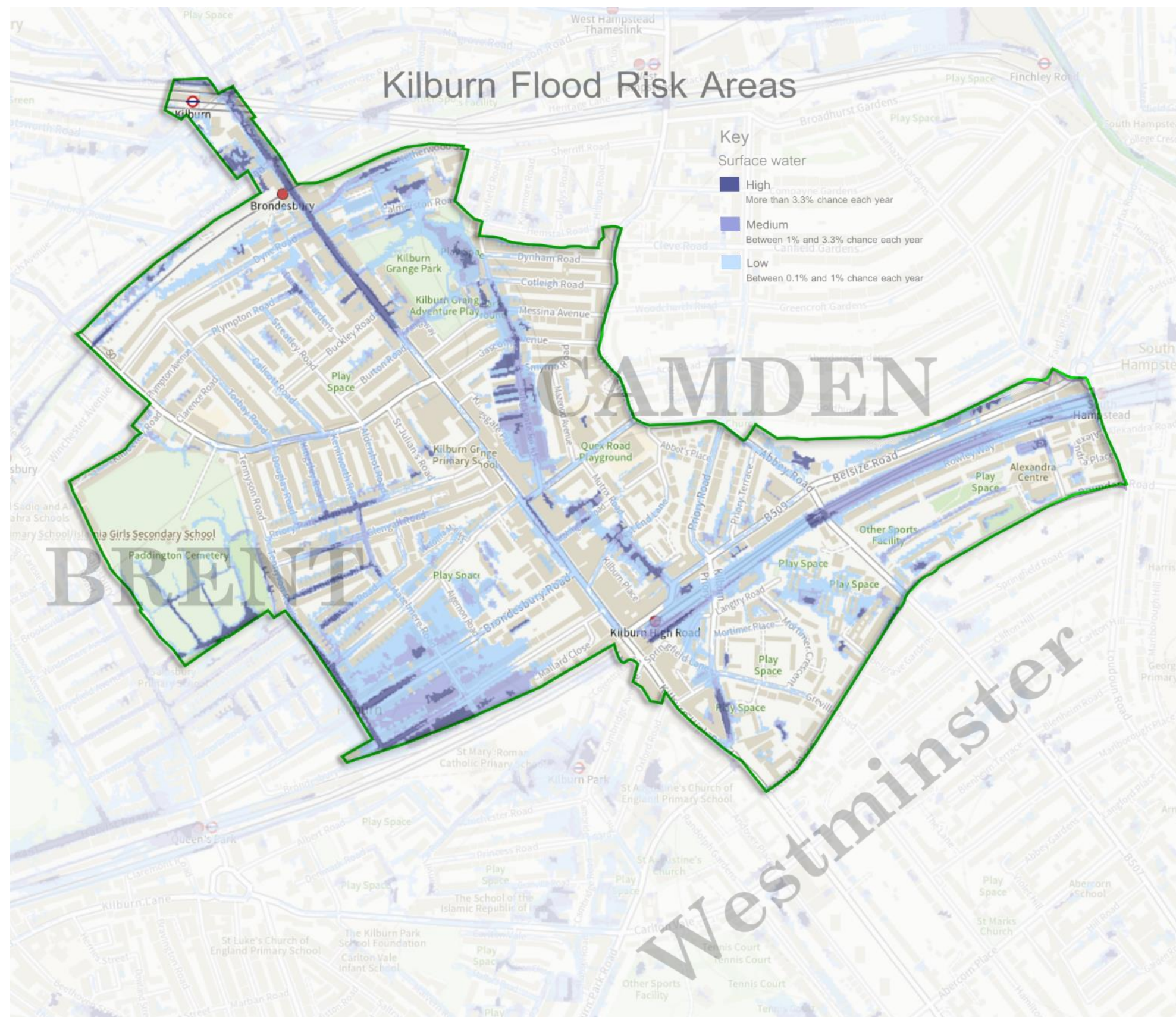


Figure 6. Kilburn Flood Risk Areas.

A linear green corridor

- 5.23** The Forum has identified the potential for creating a green corridor in the area, linking Kilburn with West Hampstead, improving the amenity of the area at a low cost and with minimum disruption. At present, the streets between West Hampstead and Kilburn High Road are presently poorly maintained, especially at the western end. However, they could be both a preferred walking, running, and cycling route and a greened area.
- 5.24** Small attractive green areas can include miniature roadside parks and playgrounds. There are examples of this such as Maygrove Peace Park and the eastern end of Iverson Road, near West Hampstead Thameslink which are just outside the Plan Area.
- 5.25** Crucially, they could be duplicated at the western end of Netherwood Street, where the north side has for years been poorly maintained and resulting in an overgrown space, to the detriment of residents, particularly those in the Webheath Estate.
- 5.26** Improving the greenery of the streets, with better signage and street architecture, including benches and simple exercise equipment, more trees to fill in existing gaps, as well as planters and pocket parks, would together significantly improve the attractiveness of the routes on either side of the railway and new amenities along it. This corridor could become an attractive walking, cycling, picnicking, exercise, and games-playing destination, significantly improving the overall balance of micro-environments around Kilburn High Road.
- 5.27** Subject to the implementation and success of such a scheme, opportunities should then be explored to extend this further to the South-East of the High Road (Fig.5).

Gateways

- 5.28** The signature, historic, feature of urban grandeur--the city gate--was once the point of access to and from walled cities. These days, gateways are more subtle and can range from simple welcome signs, artworks, and sculptures to major development projects.
- 5.29** Landmarks help to characterise and enhance an area's identity. Kilburn's gateways are or at least have the potential to be, some of its most iconic landmarks. The most significant

gateways to Kilburn are at the Northern end of the High Road, Kilburn Station (Jubilee Line), the southern end of Kilburn High RD Station (Overground), to the west Willesden Lane and to the east Belsize Road. Brondesbury Station (Overground) also provides an east west rail link whilst Canterbury Rd and Kilburn Park Station link South Kilburn to the Kilburn High Road.

- 5.30** The current arrival experience at Kilburn's gateways is uninspiring. Visitors and residents are greeted with confusing and intimidating spaces with faded murals and street clutter. There is no real sense of arrival and wayfinding is poor. Kilburn's gateways should be revitalised in a manner that reinforces the neighbourhood's identity through the use of similar materials, historic features, and scale. New murals and other artwork could help reinforce the sense of place by incorporating elements from the history of the area and contemporary reinterpretations of this. This might include Kilburn's legacy as the 'music mile'.
- 5.31** Character, and key activities in the area. These could potentially be integrated into Kilburn as part of the Legible London Scheme. Legible London is a TfL wayfinding project designed to provide better information throughout the Capital for people who want to walk or cycle. This scheme has already delivered over 1,700 of its iconic navy blue and yellow signs across the capital. As well as providing key wayfinding information, the Forum believes it would be valuable to include information on local history and details of things to do in the local area on these boards, strengthening the visitor experience.
- 5.32** Any signage would need to be carefully situated so as not to cause an obstruction on the pavements, some of which are already narrow, and to avoid creating additional visual clutter. Where possible, such signage should be combined with wider street furniture in the area, updating and replacing those items of street furniture which create visual clutter.
- 5.33** The Forum will encourage and support opportunities for improving the sense of arrival at key gateways, including proposals that:

- Give a platform to local artists to design and implement new public artworks.
- Respond to and highlight the importance of Kilburn's often forgotten heritage.
- Introduce street furnishings that may encourage the area to become a public gathering space.

Policy WK1: High Road Public Realm

Development proposals should, wherever possible and appropriate to the scale of development, take opportunities to make improvements to the quality of the public realm along the High Road. Emphasise the use of high-quality, sustainable materials and design elements that reflect the local historic character and sustain the significance of heritage buildings and spaces.

Proposals will be supported where they:

- a) Provide new areas of public open space, particularly at key gateway locations adjacent to tube and train stations.
- b) Provide, as appropriate, clearly defined areas of outdoor seating or spaces for the sale of goods in the public realm where they do not obstruct pedestrian movement (see Fig 3)
- c) Support the revitalisation of unused or left-over spaces, through artwork or lighting, other design or management measures or through uses that front onto and activate

these spaces. Temporary use of these spaces through pop-up activities and meanwhile uses will be supported

- d)** Reconfigure unused or leftover spaces to avoid dark or hidden corners and allow for the safe movement of people through the space.
- e)** Support the delivery of biodiversity net gain through greening initiatives in the public realm.
- f)** Support the reduction of “clutter” such as unnecessary telecoms infrastructure and advertising panels

Policy WK2: Mobility hubs

Proposals for mobility hubs in the Neighbourhood area will be supported where they incorporate some or all of the following elements:

- a)** Docking points for bikes and e-scooter hire.
- b)** Secure cycle parking facilities/sheds for residents.
- c)** EV charging points for cars.
- d)** Provision of car club parking spaces

Mobility hubs should be located in the carriageway, replacing car parking spaces or helping to reduce road width.

Where EV charging points are provided, cables must be directed away from the pavement so as not to cause hindrance to pedestrians.

Proposals must be of a high-quality design and, as far as possible, integrate planting and seating alongside delivery of parklets and micro-parks.

In line with TfL’s policy, mobility hubs should ideally be limited to active travel modes and caution should be taken when combining this with the provision of EV charging points and car club vehicles. They could attract additional traffic into unsuitable locations and may detract from conditions for people who are walking, wheeling or cycling

Project Box A: Public Realm Initiatives

The Forum is keen to see initiatives progress that improve the quality and appearance of the Public Realm and the wider pedestrian environment along the High Road and will seek to work with Brent and Camden Council, Transport for London, and landowners, as appropriate, to help develop and deliver improvements. This includes, but is not limited to

- a) Use of a consistent and well-maintained palette of materials along the High Road.
- b) Rebalancing of road space, the use and design of lay-bys and waiting areas to support pedestrian priority, including the introduction of parklets Including one at the western end of Priory Park RD and mobility hubs
- c) Increase the number of benches and other suitable seating on or near the High Road
- d) Plan and develop the provision of toilet facilities and their maintenance and upkeep
- e) Rationalisation of and removal of unnecessary street furniture and signage through a programme of decluttering and a programme to resist additional “clutter” including street furniture in the future.
- f) Coordinated and ongoing street maintenance, waste collection, and street cleaning.
- g) Introduction of new street tree-planting along the High Road where there is adequate space to avoid obstruction to pedestrians.
- h) Contribute to or help deliver the introduction of ‘rain gardens’, helping to manage surface water run-off and introducing areas of greenery and biodiversity. The implementation of rain gardens or similar will be supported both along the High Road and across the Neighbourhood Plan area.
- i) Support for new artwork along the High Road, particularly on blank walls and gable ends, which help respond to and highlight the importance of Kilburn’s often forgotten heritage, whilst also recognising its present-day culture and diversity.
- j) Help deliver a future network of street signage, potentially under the banner of Legible London, which delivers easy-to-understand wayfinding information, as well as information on local history and things to do in the area. Signs must be carefully designed and implemented to not cause any visual or physical obstruction.

Project Box B: Green Corridor

The Forum is keen to work with partners, to deliver a connected green corridor between Kilburn and West Hampstead in the North, and Kilburn & South Hampstead in the South, cleaning up existing spaces and establishing a new linear park to include new tree-planting, play spaces, micro-parks, and street furniture.

6. A characterful Kilburn

6.1 This chapter is framed around the following objective:

Objective 2: To promote high levels of design which respond to the local character and existing high-quality architecture

6.2 It presents policies and projects that build upon the following set of ideas and initiatives identified through work on the Plan:

- a. To develop a set of guiding design principles centring around appropriate scale, height, setbacks, and design of development which will be used to inform new development along the High Road such that it responds positively to the historic architectural heritage of the area. Special attention should be given to the prevailing scale, massing, rhythm and materiality. Where appropriate new development should seek opportunities to reinstate active street frontages and reinstate/reflect important architectural details.
- b. To ensure that the design of shopfronts matches the architectural quality of Kilburn's historic buildings through the introduction of specialised design guidance which aims to ensure preservation, maintenance, and flexibility.
- c. To support an approach to healthy streets and neighbourhoods that enhance the quality of the environment and support social cohesion, improving the ability for people of all ages and abilities to safely access the full range of community facilities and services in the area, and reducing the impact of through traffic on residential streets.TFL

Design guidance

6.3 Kilburn is an area where growth has and will continue to take place, responding in particular to the pressure and challenges for new homes set out in the London Plan and delivery of these through the Brent and Camden Local Plans.

6.4 Kilburn Square is allocated in the Brent Local Plan for new development and will make a significant contribution to the housing supply in the area as well as the delivery of other uses and facilities. However, other development will continue to take place, particularly on smaller infill sites and through intensification of existing buildings and plots. New residential units on the High Road need to take account of the very poor air quality (NO2 in particular)

6.5 The London Plan refers to 'incremental intensification' in delivering small housing sites. Within Kilburn, proposals for new growth and change represent an opportunity to reinforce the sense of place and identity. An approach to 'gentle densification' is supported, where new development respects the overall character of the street and makes a contribution to the value of the area. A Kilburn 'High Road Design Code' is presented on the following pages with the intention of informing development proposals so that they make a positive contribution to the character of the High Road and the adjoining Willesden Lane & Belsize Road.

6.6 The High Road itself and nearby streets boast a richly built fabric of Victorian era development, consisting of a variety of architectural styles. The built form is comprised of mostly four-story building with some one, two, three and five storey buildings. Upper storeys include interesting architectural details, detailing, and signage, but is somewhat detracted by the quality of shopfronts at ground level. As well as Victorian style

development, the High Road features some attractive Art Deco buildings. The most notable of this type of development is the Grade II* listed Gaumont State Cinema, but also of note are the building currently occupied by Primark, which features an elegantly decorated Art Deco façade. The variety of architectural styles and features complement each other well and create an interesting and unique built environment.

6.7 While the High Road is the focus of this Neighbourhood Plan, it is important to recognise the value and character of the wider area. Whilst diverse, there are common themes that should be reflected in development away from the High Road.

6.8 The streets surrounding the High Road consist of predominantly Victorian housing, with some significant areas of social housing. Streets tend to be quiet and leafy with well-maintained front gardens, with popular examples coming from the tree-lined streets of the North Kilburn conservation area, north of Willesden Lane and West of the High Road. Properties are typically up to three storeys in height across the area except the High Road itself where they are predominantly four storeys. In the Brent side of the Neighbourhood Area, smaller terraced houses can be found in the north, while larger, townhouses are found in the south in the Kilburn conservation area: these are for the most part converted into flats. There are also areas of social housing.



Kilburn High Road Design Code

*Frontages of buildings/business units/dwellings

Fig 7 Design Code Areas on Kilburn High Road, Willesden Lane & Belsize Road.

KILBURN HIGH ROAD CODE

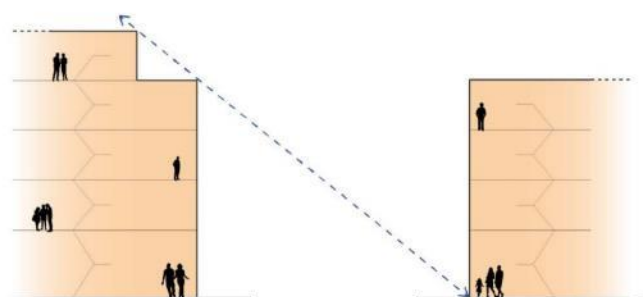
This design code applies to development within the defined town centre boundary along Kilburn High Road and Willesden Lane

1/ Enclosure



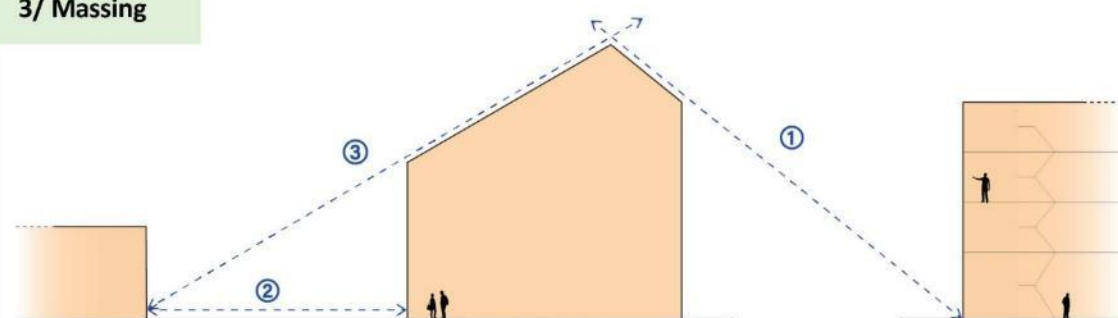
Building height must be in proportion to the established 'enclosure ratio' of the street, expressed as the prevailing building height measured against the distance between buildings that face each other across the street.

2/ Height



Additional height may be acceptable where the enclosure ratio is retained and additional floors are set back from the 'shoulder height' of the established building line. Any additional building needs to be carefully designed piece of architecture.

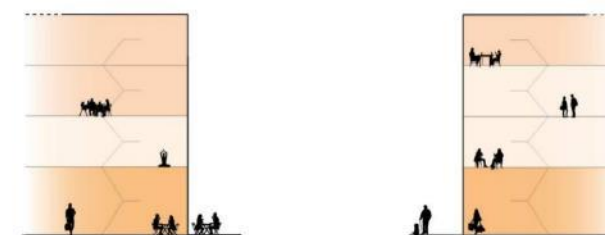
3/ Massing



The envelope within which new buildings may be considered acceptable will be determined by a combination of:

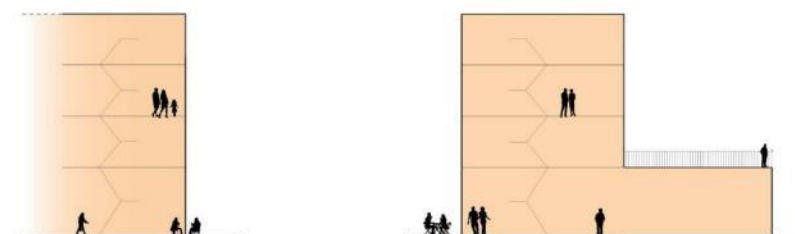
1. The prevailing heights and enclosure ratio on the street to which it fronts.
2. Conformity with back-to-back distances with adjacent properties.
3. Sunlight / daylight requirements measured from the mid-point of ground floor windows of neighbouring properties.

4/ Mix



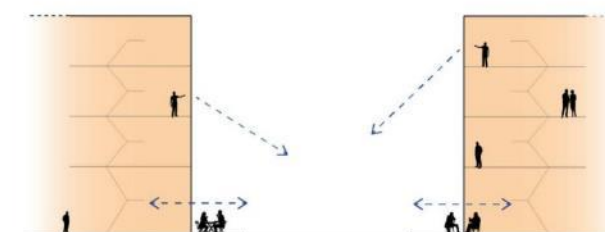
Ground floors will be suitable for retail, commercial, cultural, entertainment and community uses. Residential use will be appropriate on upper floors, subject to being complementary with the ground floor use. Community and commercial use may also be appropriate on upper floors.

5/ Flexibility



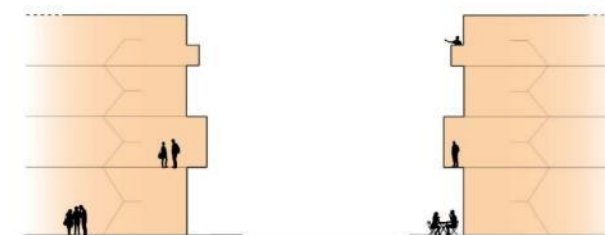
Floor to ceiling heights at ground floor level must be no less than 4m to allow for a variety of non-residential uses. Ground floors can extend beyond the depth of the main building but, where they do, roof space must be accessible to occupiers of upper floors, comprising communal outdoor space.

6/ Edge



Building fronts must align with the established building line along the street. Fronts must have active edges, with entrances onto the street at ground level and windows on all floors overlooking the street, providing natural surveillance.

7/ Frontage



Ground floor shop fronts and signage must create uniformity in style and design along the street. On upper floors, the frontage can be articulated through provision of balconies, loggias and terraces, providing interest and interaction with the street.

Fig 8: Design Code for Kilburn High Road, Willesden Lane, and Belsize Road

6.9 Brent and Camden both place an emphasis on retaining the historical and cultural value of areas within their respective boroughs. Brent, through their Local Plan, recognised heritage and cultural assets can have great value in creating local distinctiveness and a sense of place. For these assets, as a minimum, the Council seeks to ensure new uses, extensions or new build preserves them or their setting and ideally enhances it. Similarly, Camden places great importance on preserving the historic environment. Through Policy D2, the Local Plan seeks to enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets. See also the Mayor of London's Good Growth by Design Guidance

6.10 Kilburn benefits from fifteen listed buildings, twenty-two locally listed buildings (see appendix 2), and eight different conservation areas. It is clear from these numbers alone that Kilburn's heritage is rich and should be retained. Conservation areas are an important part of an area's heritage, representing some of the best retained examples of historic buildings and architectural styles and provide a level of protection over unlisted buildings.

6.11 Across the Kilburn and North Kilburn Conservation Areas, brick construction with yellow stock or red facing brick stone and stucco dressing was employed in the construction of the buildings. Other common materials in these areas include stone and stucco dressing, brick and terracotta dressing, slate roofs, cast iron and timber sashes.

6.12 The houses in the Kilburn Conservation Area are of several different styles, which reflect the four periods during which the development of the area was phased. The different types of Victorian architecture in Kilburn Conservation Area combine to make this an attractive residential area. The type of material and finishes used varies across the conservation area, although all houses are brick, some red and some stock brick. The finish used also varies between zones, some with stucco and others with plain brickwork and stone.

6.13 Meanwhile, the special character of the North Kilburn Conservation Area is based on the classical design of the buildings and decorative features, tree-lined streets, small front gardens coupled with low boundary walls, small trees and shrubs and hedges that together form an attractive street scene. The houses in the Conservation Area are classically proportioned and styled, and in addition a number of properties also have Arts and Crafts influences amongst others in their composition and detailing.

6.14 Priory Road Conservation Area is a small pocket of Victorian, Italianate style houses inspired by the palaces of Renaissance Italy and influenced by Osborne House built for Queen Victoria in 1849. Semi-detached villas predominate, mostly with three storeys and a basement. Key elements include visible shallow pitched roofs with overhanging eaves supported on brackets, rounded or Romanesque arches, sash windows, porticos, and decorative ironwork.

6.15 The Priory Road Conservation Area represents a unique district within Kilburn, but the majority of development within the area reflects the general qualities of the Kilburn and North Kilburn Conservation Areas.

Safer places

6.16 Through work on the Neighbourhood Plan concern has been expressed with regard to personal safety and the presence of crime, both real and perceived. As far as possible, development should be designed to help create safer and more socially inclusive places that can be enjoyed by the community as a whole. See the Mayor of London's Good Growth by Design Guidance.⁶

6.17 The physical security of a building alone does not necessarily make it 'secure'; instead, it is a by-product of well-thought-out, inconspicuous crime prevention measures, that are incorporated within the whole design. Secured By Design (SBD) is the UK Police flagship initiative supporting the principles of "designing out crime" through the use of effective crime prevention and security standards for a range of applications. A summary of the guidance put forward by SBD is presented in Table 1. Schemes coming forward in the neighbourhood plan area should follow all guidance that is relevant to their scheme.

6.18 Similarly, National Design Guide (page 2) links the delivery of safe places back to established urban design principles, being:

- Access and movement: places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security
- Structure: places that are structured so that different uses do not cause conflict
- Surveillance: places where all publicly accessible spaces are overlooked
- Ownership: places that promote a sense of ownership, respect, territorial responsibility and community
- Physical protection: places that include necessary, well-designed security features
- The Mayor of London's Violence Against Women and Girls Strategy should be taken into account when thinking about designing safer places for all.
- Activity: places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times
- Management and maintenance: places that are designed with management and maintenance in mind, to discourage crime in the present and the future

6.19 Through application of good urban design principles development in Kilburn can contribute towards the creation of a safer place. This applies both to new development and opportunities to remodel or redevelop existing buildings and spaces, including left-over spaces, dark and indirect routes found along the High Road and within residential estates. Table 1 (below) provides useful guidance when discussing these issues.

⁶ <https://www.london.gov.uk/programmes-strategies/shaping-local-places/advice-and-guidance/about-good-growth-design>

Category	Secure by Design guidance summary
Layout of roads and footpaths	Vehicular and pedestrian routes should be designed to ensure that they are visually open, direct, well used and should not undermine the defensible space of neighbourhoods.
Communal areas and play space	Should be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space should be clearly defined and open spaces must have features which prevent unauthorised vehicular access.
Dwelling boundaries	It is important that the boundary between public and private areas is clearly indicated. For the majority of housing developments, it will be desirable for dwelling frontages to be open to view, so walls, fences and hedges will need to be kept low
Layout and orientation of dwellings	Dwellings should be positioned facing each other to allow neighbours to easily view their surroundings and thus making the potential offender feel vulnerable to detection.
Gable end walls	It is important to avoid the creation of windowless elevations and blank walls immediately adjacent to public spaces; this type of elevation, commonly at the end of a terrace, tends to attract graffiti, inappropriate loitering and ball games.
Rear access footpaths	It is preferable that footpaths are not placed to the back of properties. If they are essential to give access to the rear of properties they must be gated. The gates must be placed at the entrance to the footpath, as near to the front building line as possible, so that attempts to climb them will be in full view of the street.
Dwelling identification	Clear signage (naming and/or numbering) of properties is essential to assist residents, postal workers and the attendance of emergency services.
Climbing aids	Boundary walls, bins and fuel stores, street furniture, trees, low flat roofs, car ports or balconies should be designed to remove climbing aids to gain access into the property.
Planting in new developments	The planting of trees and shrubs in new developments to create attractive residential environments will be supported provided that the layout provides sufficient space to accommodate specimens once they have reached maturity, clear of access routes and required circulation areas.
Street lighting	Bollard lighting is purely for wayfinding and can be easily obscured. It does not project sufficient light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime. It should be avoided.

Table 1: Summary of Secure by Design guidance.

POLICY CK1: A characterful Kilburn Design Principles

(1) Context-driven design

Proposals for development must respond to the character of the immediately adjacent area within which it is located, defined in terms of heights, scale, massing and relationship with the street.

- a) Development should consider features of architectural merit present on nearby buildings which help articulate and add interest to building frontages, as appropriate.
- b) Along the High Road. Willesden Lane and Belsize Road retail frontage (as defined in the Brent and Camden Local Plans), allocation proposals will be supported where they conform to the 'Kilburn High Road Code' presented in this Neighbourhood Plan.
- c) Outside of the High Road, Willesden Lane and Belsize Road retail frontage:
 - i. Development should respond to and contribute towards the verdant nature of Kilburn's residential streetscape and, where appropriate, historic growth and qualities as reflected in the Conservation Area Appraisal within which development is located.
 - ii. Development should respond positively to the existing architectural style of the residential area; Victorian design features such as bay windows, porches, and terracotta detailing on facades and rooftops could be taken as design cues.
 - iii. The prevailing height of buildings in the immediately adjacent area should inform the height of new development proposals. These adjoining heights should not generally be exceeded, unless there is a clear and justifiable urban design reason for taller buildings.

(2) Safer places through design

Development should be designed with safety in mind and will be supported where the following criteria is met:

- a) Provide pedestrian routes that are visually open, direct and well used. Footpaths should not be placed at the rear of properties.

- b) Ensure that the planting of trees and shrubs does not create a physical obstruction or restrict the performance of street lighting
- c) Development must clearly define the boundary between public and private areas.
- d) Allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go.
- e) Avoid the creation of windowless elevations and blank walls immediately adjacent to public spaces

Shopfront

6.20 Kilburn High Road is lined either side by a high proportion of good quality, well-designed historic buildings. Unfortunately, many of the shopfronts along the High Road do not match the quality of the buildings they are situated within.

6.21 Brent has produced a Shopfronts SPD⁷. This provides extensive guidance on positive design principles for shopfronts. One of the key principles of the SPD insists that shopfronts should not be designed in isolation, relating in scale, proportion and architectural style to the host building and wider street scene.

6.22 Similarly, Camden has also produced a Planning Guidance SPD⁸ which provides advice on shopfront design. Of particular relevance to Kilburn, because of its architectural quality, is the key message that “*shopfront alterations to existing buildings should respect the detailed design, materials, colour and architectural features of the shopfront and building itself*”. The SPD goes on to note how vibrant and well-designed shopfronts are vital in breathing life into the street, making it a more visually stimulating space for its users and contributing to healthy places.

6.23 Kilburn High Road has seen a number of insensitive alterations to shopfronts as well as newer, poorly designed shopfront, which have eroded the character of the local area, and more specifically, detracted from the character of the host building.

6.24 New shopfronts should help restore the character of the local area and host building, drawing upon best practice. Where the shopfront relates to a historic building, specific guidance published by the British Standards Institute⁹ should be followed. Of particular relevance to Kilburn and its shopfronts is paragraph 5.8, which discusses the role of significance within place shaping and utilisation of local distinctiveness. Here, the guide recommends a holistic approach is taken in order to ensure that the sense of place and local identity is maintained. Indeed, Historic England¹⁰, through their advice on how to manage historic town centres and high streets, suggest that shopfronts should be managed and reviewed as a collection rather than individually. Shopfront design should balance the scale, proportion, massing and materials of new elements of the old elements.

6.25 However, this is not to say that all shopfronts must follow an identical pattern of design, although consistency in terms of the palette of materials used, colours and signage types will help bring unity to the area, whilst at the same time providing room for interpretation and the diversity of the area to be represented. Designs can take reference from historic elements, be modern and contemporary, or both, so long as they are of a high quality.

⁷ <https://www.brent.gov.uk/planning-and-building-control/planning-policy-and-guidance/supplementary-planning-documents-and-guidance>

⁸ <https://www.camden.gov.uk/planning-policy-documents>

⁹ BS 7913: Guide to the Conservation of Historic Buildings

¹⁰ <https://historicengland.org.uk/advice/planning/historic-towns-and-high-streets/>

Policy CK2: Shopfronts

Proposals for altering, replacing or new shopfronts which follow design guidance are more likely to be supported where they meet the following criteria:

- a) The shopfront should relate in scale, proportion and architectural style to the host building and wider street scene, including the scale, character and features of adjoining buildings as appropriate.
- b) The fascia should complement rather than obscure or damage existing architectural features including windows.
- c) Fascia should only be illuminated in a subtle way; it should not cause any disturbance to others due to its intensity or direction.
- d) On modern shopfronts robust materials will be considered but plastics, bare metal and reflective materials should be avoided,
- e) Large areas of plate glass, often incorporating a doorway, create a visually non-cohesive appearance and should be avoided.
- f) Restoration of original and traditional shopfronts must replicate the original materials of the host building and be as close to the original shopfront as possible. Common materials include wood, brick and stone and sometimes iron work.

Planning applicants for shopfront changes within the Neighbourhood Plan, may need professional advice dependent on location, conservation and or historic building status.

Project Box C: Kilburn shopfront design

The Forum encourages shopfront signage where the shop name forms only a modest part of the fascia: generally, text should cover no more than half the width and half the height of the fascia and the font should not be higher than 30cm (one foot). Also, that a limited number of colours should be used and that bright colours should generally be avoided. The Forum also considers that shopfronts should not be designed in isolation. Any proposed design should relate in scale, proportion and architectural style to the host building and the wider street scene. A shopfront should continue the design language of the building and adjacent shops by acknowledging the common features that occur on the surrounding buildings. Cluttered displays and closed panels within the shopfront are discouraged.

The Forum encourages shopfront signage to adhere to the Supplementary Planning Documents (SPD's) guidance published by Camden and Brent. Brent's SDP3 is especially detailed. In addition, some planning applicants for shopfront changes within the Neighbourhood Plan may need professional advice on the application of BS 7913: Guide to the Conservation of Historic Buildings. BS 7913 describes best practice in the management and treatment of historic buildings.

The Forum would like to encourage the introduction of a scheme in which shopfronts are able to integrate artwork and imagery that reinterprets the role of the High Road. With collective support from shop owners, there is the potential to produce an art trail which represents the cultural diversity of the area.

It should also be noted that these improvements should be read alongside the proposals given on public realm initiatives (project box A) emphasising a cohesive approach and sense of space.

Active and healthy neighbourhoods

6.26 Kilburn is home to a diverse community and people of all ages. To support inclusiveness the community as a whole should be able to move around safely and easily, preferably by foot or by bike for short journeys to everyday services and facilities, including schools, parks and healthcare as well as shops and other retail activities.

6.27 There are four primary schools in Kilburn and one secondary school. To encourage a move away from the car-based school run initiatives are encouraged that make walking and cycling an attractive proposition for all ages. This includes the potential introduction of School Streets, closing streets around schools to traffic at the start and end of the school day to promote walking and cycling, reduce short car trips, and provide a safe space for children and

parents. Such an initiative can also help embed active travel into children's behaviours, resulting in long term change.

6.28 Other street-level initiatives include the idea of Play Streets or Home zones. Deriving from The Netherlands, where such streets are known as 'Woonerfs', these streets typically include shared spaces, greening, traffic calming and low speed limits. A central goal of the concept is to remove the traditional segregation of vehicles, bicycles, and pedestrians in public spaces and encourage natural human interaction.

6.29 Further initiatives to help move towards safe and active neighbourhoods are presented in TLF's Small Change, Big Impact¹¹ guide which offers practical advice on how to deliver temporary, light touch and low-cost projects to change the way a street looks and feels. Examples given within the guide feature a range of potential projects including: a one-day closure of a street for a community festival; planting new flower beds; a new street design creatively tested for a limited period of time; parking spaces used to extend a café's terrace in the summer.

6.30 Schemes to improve the local movement network to better reflect the ambitions above, and reduce unnecessary vehicle movements, based on TfL's Healthy Streets methodology to create Healthy Neighbourhoods, will be taken forward where there is local support and as funding becomes available.

Such neighbourhoods typically comprise:

- traffic cells where through-traffic is restricted by barriers like bollards or planters;
- urban boulevards/avenues or people-friendly main roads with safe space to cycle, generous pavements, planting, seating; and
- connected quiet streets that link the traffic cells with safe crossings across the boulevards/main roads. This creates a city-wide network of direct routes for walking and cycling that any age or ability can use.

Policy CK3 (A characterful Kilburn): Streets for people

Proposals for development will be supported which:

- a) Provide safe routes and crossing points for pedestrians and cyclists.
- b) Incorporate a car free policy.
- c) Incorporate conveniently located and secure cycle parking, including areas of cycle parking within the public realm subject to compliance with wider design policies and compliance with appropriate minimum standards in force at the time.

¹¹ TfL, 2017, Small Change, Big Impact

Project Box D: (A characterful Kilburn) Active, healthy, clean and safer neighbourhoods

The Forum welcomes opportunities to work with residents and residents' associations to make streets work better for those that live on them.

This may include remodelling existing streets as a Play Street or Homezone. This would need to involve the cooperation of homeowners and close partnership with the relevant authorities, to identify a pilot project to trail this concept, ahead of any longer term roll-out of such a project. Identification of a pilot project would enable funding streams to be identified to help facilitate such transformation, with management and maintenance regimes and responsibilities established as a result of the trial.

The Forum supports consideration of the Healthy Streets Approach and selective vehicle access restrictions as discussed in paragraph 6.30

Ahead of this, temporary applications for street closures as part of annual car free days and other similar events are encouraged and can be used to monitor the community benefits.

The feasibility of introducing other schemes, including those that follow the principles of healthy streets, as well as School Streets, will continue to be investigated.

Sound monitoring equipment could be installed on the High Road and particularly affected streets to prevent disturbance to pedestrians, cyclists and residents by excessively noisy vehicles.

Litter bins should be made available in adequate numbers, and regularly emptied.

Additional resources will be sought to ensure more frequent cleaning on both sides of the High Road

Reductions in street crime, begging, and rough sleeping could be achieved by coordinated prioritisation of policing and social work resources.

CCTV coverage should be improved and better integrated between Brent &, Camden and TfL.

Design review

6.31 Paragraph 133 of the NPPF states that Local Planning Authorities should have access to and make use of tools and processes to assess and improve the design quality of development, including making use of design review arrangements.

6.32 Design review is a way of assessing the design quality of new developments by an independent panel of experts to support high standards of design. For projects in Camden, guidance will be provided by the Camden Design Review Panel, while for those in Brent, guidance will be provided by the Brent Quality Review Panel.

6.33 In Kilburn, it is envisaged that major applications for development, as well as smaller schemes in sensitive or important locations, such as within conservation areas, should be subject to design review. This might include residential, commercial and mixed-use development proposals, infrastructure, community facilities, public realm and open space proposals.

6.34 Design review should take place at the pre-application stage to inform the design process and again following submission of the application, helping to inform officer recommendations. The final proposals submitted should show how comments made during the sign review have influenced the proposed development.

7. A distinct Kilburn

7.1 This chapter is framed around the following objective:

Objective 3: To preserve, enhance and promote the distinct identity and heritage of Kilburn

7.2 It presents policies and projects that build upon the following set of ideas and initiatives identified through work on the Plan:

- a. To support the protection of existing and future provision of cultural, leisure, entertainment and creative venues in the neighbourhood area which are managed in such a way that these activities do not adversely impact on residents and other users.
- b. Important heritage assets, such as the Gaumont State Cinema, should be identified, preserved and enhanced.
- c. Retain and provide a full range of accessible and inclusive community facilities, including street markets, that meet the needs of the community as a whole.

The ‘local retail offer’

7.3 Kilburn is designated as a major town centre in the London Plan. These areas are places that, in the words of the London Plan, should be the focus for the majority of higher order comparison goods retailing, whilst securing opportunities for higher density employment, leisure and residential development in a high-quality environment.

7.4 The Brent Workplace Study (2017) outlines that Kilburn town centre has 266 units, 200 businesses and employs 1,290 people. The AECOM Socio-economic profile also shows there were a total of 457 units across the study area. These data offer a useful insight into the importance that Kilburn plays in supporting the local community.

7.5 The Brent Retail & Leisure Study (2018)¹² found that Kilburn had the highest comparison goods turnover of any centre in the Brent Borough and has increased its market share over the past decade. However, the Camden Retail Study¹³ states that there is scope to improve the role of comparison retail in Camden’s Kilburn ward, which is “a weak element of its current offer” despite being Camden’s second largest Town Centre. Camden have just published an updated Retail and High Street Needs Assessment 2024 as part of the Camden Local Plan evidence,

7.6 Despite the designation as a major town centre in The London Plan, feedback from the Commonplace consultation repeatedly showed that residents were not impressed by the local retail offer of Kilburn, with some land uses criticised for detracting from the overall character of the Neighbourhood Plan Area. Previously respondents felt that the High Road suffered from a proliferation and concentration of fast-food takeaways, betting shops and payday lenders. These businesses, particularly when clustered together, were considered to

detract from the visitor experience of the High Road. However, in the past 5 years Kilburn High Road has seen a reduction in the number of betting and payday loan shops.

7.7 Brent addresses this issue within the Local Plan through Policy BE5: Protecting Retail in Town Centres. This policy imposes a set of specific restrictions on the quantity and concentration of betting shops, adult gaming centres, pawnbrokers, fast food takeaways and shisha cafes. Camden also includes restrictions on undesirable land uses in its Town Centres within its Local Plan, albeit less specific than Brent.

7.8 With the High Road being split down the middle between Brent and Camden, having a separate approach to managing land uses can lead to an incoherent High Street, with an odd mix and concentration of certain land uses. A unified approach to the promotion and management of land uses is required,

Leisure and entertainment

7.9 Kilburn High Road was previously referred to as the ‘Music Mile’ by the London Tourist Board, specialising in Irish and country music performed in impressive gig venues such as The National or the Gaumont, as well as in the local pubs. Unfortunately, many of these venues have closed and although the area no longer benefits from the same status it once had, it remains an important location for live entertainment and supporting the evening economy, attracting visitors to the area.

7.10 The London Plan, through Policy HC6 Supporting the Night Time Economy, seeks to maintain and improve the capital’s status as an attractive entertainment destination. Brent’s night time economy has a symbiotic relationship with cultural industries, both supporting and being reliant upon them. Within Brent, The London Plan identifies the night time economy of Kilburn High Road as of ‘more than local importance’.

7.11 The London Plan, through Policy D13: Agent of Change, supports the role of night time and entertainment venues. It suggests that the responsibility for mitigating impacts from existing noise and other nuisance generating activities or uses on the proposed new noise sensitive development. This means that those looking to establish new entertainment venues should have some added confidence that as long as their function does not impact existing neighbours, there will be no threat from new developments forcing them to reduce their hours, lower noise volumes etc. as the responsibility falls on those new developments coming forward around them to mitigate any nuisances.

7.12 The Neighbourhood Plan identifies an area along the High Street where new culture and entertainment uses will be supported, as well as wider uses supporting the evening economy, including pubs, restaurants and cafes (Figure 9). This area is focused around the historic clustering of cultural venues around the junction of the High Road and Willesden Lane and which comprised the heart of ‘Music Mile’, including the National, the Gaumont State Cinema, and the Kiln Theatre (see information box).

¹² Brent Retail & Leisure Study (Document A) Volume 1 - Main Report (October 2018)

¹³ Camden Retail and High Street Needs Assessment (2024)

Information Box: 'Music Mile' venues

Formally known as the Grange Cinema, the National Club was established as a music venue in 1976, it was extremely popular among the large Irish community in the area. As well as Irish showbands, it featured many famous performers, including Johnny Cash, Simply Red and David Bowie, until it closed in 1999. Now the building is used by the Universal Church of the Kingdom of God.

The Gaumont State Cinema, Kilburn's most iconic entertainment venue, was designed by the famous cinema architect George Coles and seated 4,004 people. After opening in 1937 it became a popular entertainment venue, hosting variety, pantomimes, circus, ballet and concert performances in addition to film screenings. In the 1980s the building became Mecca Bingo and in 2007 it closed, and like The National was bought by a religious group, the Ruach City Church.

The Kiln Theatre (formerly the Tricycle Theatre) Since 1980, the theatre has presented a wide range of plays reflecting the cultural diversity of the area. In 2018, after another re-design project, the Tricycle re-opened as The Kiln, with a new café, rehearsal rooms, improved accessibility, better sightlines, comfortable seats and flexible stage. The Kiln has a 300-seat cinema and a slightly smaller theatre complex.

enhance the "night time economy" of Kilburn with the possibility of a night market, street entertainment and food stalls.

7.13 While the Gaumont and the National, among others, are no longer used for entertainment purposes, they play an important role in forming the history and cultural identity of Kilburn. It is for this reason that it is proposed that entertainment venues are 'clustered' around what once used to be the heart of the music mile. The venues listed above are iconic, and their location would represent a great place to form a new entertainment cluster along the Kilburn High Road, a homage to what it once used to be. Should opportunities arise in the future to reuse these premises as entertainment venues, they would strengthen the focus of the evening economy in this location. There is an additional, smaller entertainment cluster at the southern end of the High Road between Brondesbury Villas and the southern tip of Camden's boundary (which also incorporates Westminster's western stretch of the High Road from Oxford Road to Kilburn Park Road).

7.14 Kilburn's one remaining live music venue, The Fiddler, also remains in this proposed entertainment cluster. The area is also home to a significant proportion of Kilburn's remaining public houses and bars. This includes The North London Tavern, Brondesage, The Black Lion, Sir Colin Campbell, The Earl Derby, The Bell and The Coopers Arms. The proposed cluster also features some of Kilburn's popular restaurants and cafés.

7.15 Kilburn does provide an enviable choice of restaurants, Afghan, Indian, Iraqi, Japanese amongst the many. As with the retail outlets the majority of the restaurants are independent, there are few chains. There is potential for development of Kilburn Market to

Policy DK1: Land use of retail frontage (Kilburn High Rd, Willesden Lane, Belsize Road)

Use classes which include retail, financial and professional services, cafes and restaurants (Use Class E(a) – E(c)), indoor sports and fitness (Use Class E(d)) and community facilities (Use Class E(e), E(f), F1, F2) will be strongly supported in the defined retail frontage along the High Road Willesden Lane and Belsize Road. This includes the use of vacant premises on a temporary basis and which fall within the use classes above.

Proposals for residential development (Use Class C3) will be appropriate where they comprise part of a mixed-use scheme, with residential accommodation on upper storeys.

Proposals for offices and other employment uses within Use Class E(g) do not require planning consent.

Proposals for leisure and entertainment uses, including theatres, drinking establishments, cinemas, live music venues, concert and dance halls (all Use Class ‘sui generis’), will be supported where they are located in the ‘entertainment clusters’ identified in Figure 9. Proposals for the refurbishment and reuse of the previous Gaumont State Cinema and The National as leisure and entertainment venues will be supported.

Proposals for mixed use development on the High Road, Willesden Lane and Belsize Road (as indicated in figure 9) will be supported where:

- a) Ground floor uses should generally comprise retail, commercial or community activities that open onto and activate the street.
- b) Development creates a strong and consistent building line that relates well to adjacent buildings.
- c) Residential and office uses are appropriate on upper storeys and should include windows and balconies that look out across the street and create variety and interest in building form. Wherever appropriate and where consistent with requirement para b) above.
- d) Schemes are designed carefully to avoid noise and odour conflicts between uses.

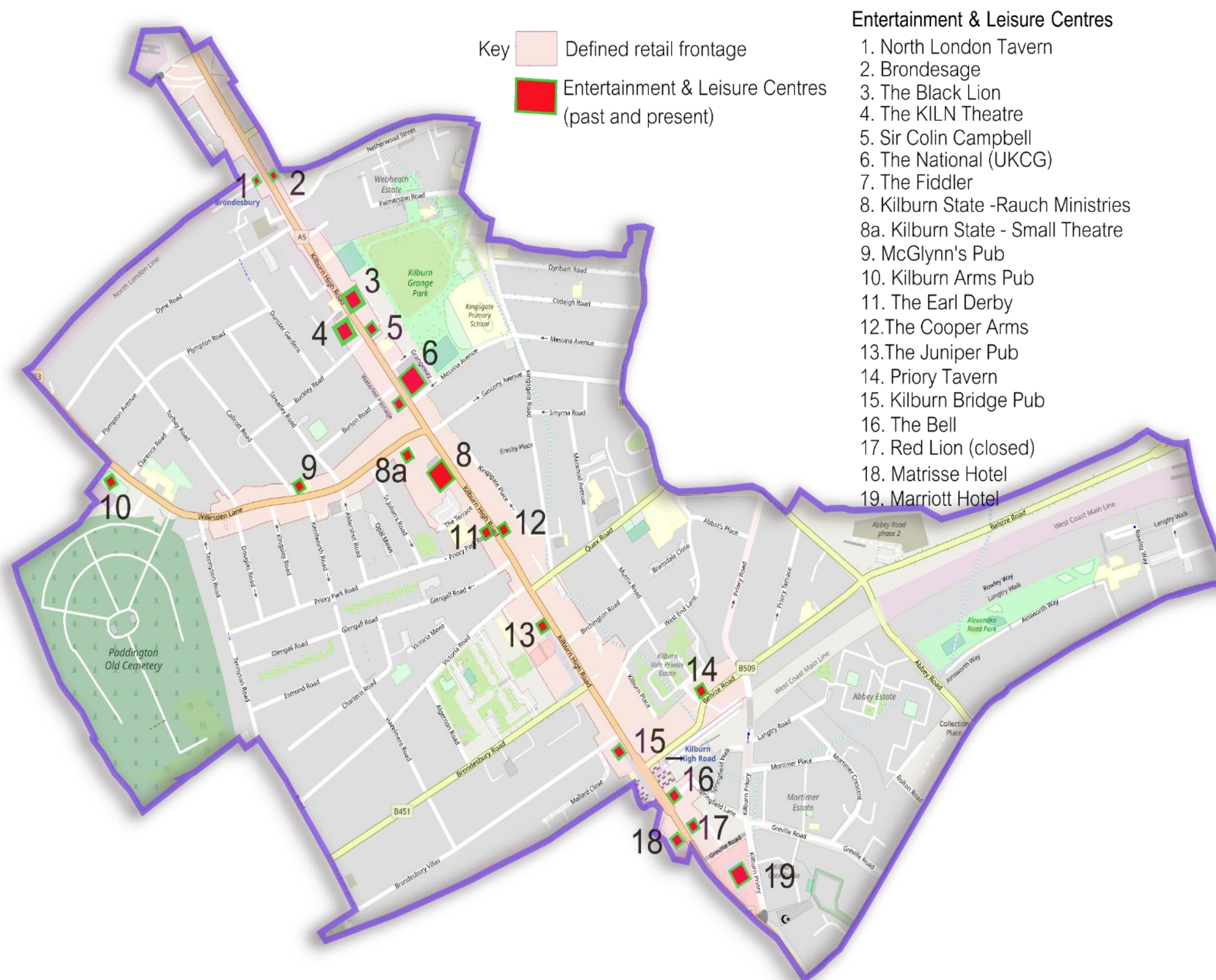


Figure 9. Kilburn's key entertainment venues, past and present

Creative industries

7.15 The London Plan emphasises the importance of supporting the continued growth and evolution of London’s creative industries.

7.16 Kilburn is an important location for the creative industries. Kingsgate Workshops, located on Kingsgate Road is a multi-use art space housed within a refurbished Victorian factory providing affordable workspace for a mix of artists, makers and designers. Metroland Studio provides free studio space as part of a joint commitment from Brent Council and Metroland Cultures to support and develop provision for visual artists in Brent, with free studio spaces for Brent-based creative practitioners.

7.17 The Brent Workspace Study¹⁴ report discusses the value of affordable workplace, how it provides opportunities to grow and retain local businesses and employment, attract new sectors, incubate start-ups, and is vital to a healthy local economy. However, the report also identified that whilst demand for affordable workspace has significantly increased in Brent, supply is failing to keep up. Furthermore, demand for flexible workspace for creative and professional service is predicted to be particularly strong in Wembley and the South East of Brent (in areas such as Kilburn).

7.18 The Brent Affordable Workspace Strategy¹⁵ found that within Kilburn there is a strong entrepreneurial culture with the highest proportion of micro businesses, home working and self-employment in the borough. Given the impact of Covid on working patterns, the demand for flexible workspaces is set to become even more important. In this regard, Kilburn has the opportunity to promote new affordable co-working opportunities which can be utilised by the high concentration of small businesses and self-employed individuals in the area.

7.19 Similarly, Camden recognises the strong creative industry that has formed within their borough, specifically in relation the performing arts, music, video, film and photography sectors, and the contribution these make to the unique character and vitality of the borough. The Creative and Cultural Industries Research Report and Action Plan 2009 found that these types of businesses create around 40,000 jobs and have an annual gross turnover of about £1 billion in Camden.

7.20 The Camden Local Plan also recognises that the strength of its creative industry relies on the availability of small affordable accommodation, such as studios

and workshops for artists. Through Policy E2, a commitment is made to continue to encourage and support the growth of this sector by promoting the provision of a range of premises for businesses that require more flexible workspaces.

7.21 The opportunity also exists for Kilburn to benefit from the agglomeration effect of nearby creative hubs, such as the Queen’s Park Creative Quarter on Lonsdale Avenue, which borders the Kilburn NDP boundary.

Policy DK2: Creative industries

Proposals for developments which incorporate affordable workspace (within current local guidelines) (Use Class E(g)) for creative industries and opportunities for co-working and space sharing, will be strongly supported.

Such uses will be appropriate within the defined retail frontage along the High Road, Willesden Lane and Belsize Road. Proposals for such uses will also be supported across the Neighbourhood Area where they do not cause noise or disturbance to the detriment of residential amenity.

Project Box E: Gallery space

To help display the creativity and diversity of the area the Forum is keen for the work of local artists to be displayed. This could take the form of a temporary pop-up within vacant units along the High Street, or within the public realm, making better use of under-utilised spaces identified in Section 5 of the Neighbourhood Plan.

To support the policy the Forum and other groups active within the plan area could seek an appropriate affordable workspace offer, or equivalent employment/training package, for commercial proposals of a limited size?

Markets and street stalls

7.22 Both Brent and Camden, through their Local Plans, recognise the importance of preserving existing markets and encouraging new markets. Brent, through Policy BE8 of their Local Plan, confirms that the Council will give favourable consideration to proposals for new markets in town centres which help diversify provision. Meanwhile Camden, through Policy TC6, supports new markets that will not cause individual or cumulative harm to the local area.

7.23 Markets add greatly to the variety, interest and attraction of shopping and are a source of local employment, often providing flexible and casual work opportunities. The introduction of new market stalls in Kilburn, supplementing those within the Kilburn Square development area, can make an important contribution to the vitality of the High Road.

¹⁴ London Borough of Brent, Brent Workspace Study, Regeneris Consulting, 2017

¹⁵ <https://www.brent.gov.uk/business/regeneration/affordable-workspace/affordable-workspace-strategy>

7.24 Proposals for new market spaces within the Neighbourhood Area are supported. However, when poorly designed or managed, these can cause harm to surrounding areas. New markets and street stalls will need to be designed to complement the wider streetscape and ensure that market users and other pedestrians are not obstructed in any way.

7.25 Within Kilburn, the existing market has been identified as an underutilised site which has not achieved its full potential. Consultation has revealed that residents feel it is run down and in need of rejuvenation. As part of the Kilburn Square proposals the market is set to be regenerated and to become a new focal point along the High Road.

7.26 Improvements to the existing market offer are welcomed, but provision of new street markets and stalls are also supported. As noted previously in this Plan, Kilburn suffers from a number of ‘leftover spaces’ where the delivery of new street markets and stalls in these locations would help ‘activate’ the spaces and bring them back to life; (see for example Fig 3)

consultation should take place with the local community and intended users as early as possible in the development and design process.

Policy DK3: Markets and outdoor stalls

The provision of new markets and street stalls within the defined retail frontage along the High Road is welcome. Proposals for such uses which activate under-utilised and left-over spaces along the High Road will be supported.

New market stalls should generally be moveable, but permanent markets stalls will also be supported where they:

- a) complement the appearance of the street;
- b) allow sufficient space for shoppers and pedestrians to pass and use the market without obstruction; and
- c) are designed such that they can be adapted over time for use by different vendors.

Social and community facilities

7.27 The presence and provision of social and community infrastructure is critical to sustaining and meeting the day-to-day needs of local residents, providing access to essential services and facilities, and helping to maintain a high quality of life. Such facilities, which include schools, healthcare, churches, sports and community centres, also have an important role to play in strengthening social networks, sense of community and identity. Kilburn currently thrives socially because of its range of community facilities and services, which should be preserved. Important facilities in Kilburn are listed in Table 2.

7.28 The Brent Local Plan, through policy BS11, and the Camden Local Plan, through policy C2 recognise the importance of delivering new community facilities and protecting existing facilities.

7.29 Where facilities are to be provided, or improvements made, they should be accessible to all, with an emphasis placed on good walking and cycling links to these, as well as provision of secure, and dry, cycle parking provision. All facilities should be designed to reflect the character and qualities of the site and local setting. Wherever possible the fullest public

Social and Community facilities in Kilburn (Plan area)

Community and Health

- Netherwood Day Centre
- Kingsgate Resource Centre
- Kilburn Grange Children’s Centre
- Kilburn Grange Park Adventure Play Centre
- Kingsgate Workshops Trust
- 107, Kingsgate Road ‘Community Space’
- West Hampstead Women’s Centre
- Private Tenants Advice Centre
- Mazenod Social Club
- The Abbey Community Centre
- The Abbey Medical Centre
- The Alexandra and Ainsworth TRA Hall
- Kilburn Square Co-op Community Hall
- Latin American Association, Kingsgate Place

Public houses

- The Old Bell, Kilburn High Road
- The Juniper, (formerly the Cock) Kilburn High Road
- The Coopers Arms, Kilburn High Road
- The North London Tavern, Kilburn High Road
- The Earl Derby, Kilburn High Road
- The Black Lion, Kilburn High Road
- Sir Colin Campbell, Kilburn High Road
- The Kilburn Arms, Willesden Lane
- Kilburn Bridge, Kilburn High Road
- Mc Glynn’s Bar, Willesden Lane
- Brondes Age, Kilburn High Road
- The Fiddler, Kilburn High Road
- The Priory Tavern, Belsize Road

Place of worship

Policy DK4: Social and Community facilities

(1) Important local social and community facilities

Important local facilities in the Kilburn plan area are listed in Table 2 of the Neighbourhood Plan (at May 2023). Social and community use will generally be protected from loss.

Proposals that involve the loss of any space used for social or community purposes will only be supported where a replacement facility that would better meet the needs of existing users is provided. or where the application is supported by material which demonstrates the benefits to the community would outweigh the harm created by loss of that facility.

(2) New or improved facilities

Proposals for new or improved community facilities will be supported and should:

- a) include provision of flexible space that can be used for a variety of community uses;
- b) be provided in locations that capitalise on opportunities to promote walking, cycling and use of public transport;
- c) be easily accessible to all; and
- d) respond to local character, design policies and guidance set out in the Neighbourhood Plan.

- Menchu Nursery, Kingsgate Place
- Sycamore Community Hall, Kilburn Vale Estate

- Kingdom Hall of Jehovah’s Witnesses, off Dyne Road
- Kilburn Evangelical Free Church

- Mortimer Hall, Mortimer Estate
- Conway Hall, Quex Road

- The Tin Tabernacle, Cambridge Avenue boundary

Leisure

- Kiln Cinema, Kilburn High Road
- Kiln Theatre (formerly The Tricycle), Kilburn High Road
- Charteris Sports Centre, Charteris Road
- Kilburn Library Centre, Kilburn High Road
- Bannatyne Health Club, Kilburn High Road

- Ruach City Church / Gaumont State
- Quex Road Methodist Church
- Sacred Heart Church, Quex Road
- The Parish of St Mary
- The Islamic Centre of England, Kilburn High Road / Maida Vale gateway

Education

- The Institute of Contemporary Music Performance
- Chaston Nursery School
- Kingsgate Primary School
- Kilburn Grange Primary (Free) School
- St Mary’s C of E Primary School, Quex Road
- Abacus Arc Nursery
- The Learning Tree Nursery, Quex Road
- Busy Bees Nursery, Kilburn Square

Table 2: Important social and community facilities in the Kilburn Neighbourhood Plan area

8. A coordinated Kilburn

8.1 This chapter is framed around the following objective:

Objective 4: To present a coordinated voice and Governance structure to oversee the continuous improvement of the Plan area.

8.2 This chapter is less about land use or development policies and more about bringing together projects and wider aspirations to help deliver change in Kilburn, with the community being at the heart of this. It builds upon the following aspiration identified through work on the Plan:

With the Plan area straddling borough boundaries, it is important to align projects and plans for the area such that it comes together as ‘one place’. The Forum presents the genesis of such a structure, to be developed further in liaison with Brent and Camden Councils.

We note the formation of “One Kilburn” during the writing of this neighbourhood plan which is also dedicated to the unity of Kilburn across the High Rd.

Governance

8.3 The Forum, having been re-designated, now exists as a formal organisation until early 2027. During this period the Forum committee will oversee the implementation of the Neighbourhood Plan and continue to be a conduit for community participation through its wider membership.

8.4 One of the key motivating issues in the formation of the neighbourhood area, Forum and Plan, is the division of Kilburn between two London Boroughs: Brent and Camden. The difficulty of co-ordinating Council actions and proposals has remained throughout the period the Forum has been in existence.

8.5 In order for the policies and projects of this Plan to make a significant difference to the lives of those living and working in and visiting Kilburn we need the active support and cooperation of both Councils at the same time. In order to facilitate this, it is proposed that as part of the implementation of this plan a Kilburn Standing Committee is established.

8.6 It is proposed that the membership should include the elected Councillors for the Kilburn wards in both Boroughs; appropriate Council officers (from both Boroughs) with development, economic planning, and town centre management responsibilities;

representatives of the Forum; representatives of local business; and representatives of community organisations.

8.7 The main purpose of this standing committee will be to review the implementation of the Plan with specific reference to issues that can be more speedily resolved by greater co-

operation between Brent and Camden Councils. It is suggested that the committee will meet three or four times a year. This should be kept under review as other liaison committees may emerge over time.

Project Box F: Standing Committee

The Forum proposes that a ‘Standing Committee’ is established for Kilburn, enabling the Forum and representatives from Brent and Camden Councils to come together on a regular basis to monitor the implementation of the Neighbourhood Plan.

Community Infrastructure Levy

8.8 The Community Infrastructure Levy (CIL) is a charge levied on development which is payable to Brent and Camden Boroughs and is intended to be spent on infrastructure projects across their administrative areas that help address the demands placed on it resulting from growth. This might include, for example, spending on new transport infrastructure, health and educational facilities, open spaces and sports facilities.

8.9 The Brent CIL Charging Schedule took effect on 1st July 2013¹⁶. The Camden CIL Charging Schedule took effect on 30th October 2020¹⁷. All applications for development that are above the necessary thresholds will be subject to the relevant charging schedule (depending on which borough the development is located within), or any subsequent updates to it.

8.10 A portion of CIL is ring fenced for spending on local neighbourhood projects identified by the local community see Local CIL Ward Priority List 2023-24¹⁸. Through consultation and work on the Neighbourhood Plan a series of projects have been identified which the Neighbourhood Forum is keen to direct the neighbourhood portion of CIL towards. These are referred to through the Neighbourhood Plan in the blue project boxes. These projects will be kept under review.

8.11 Alongside CIL, Brent and Camden Boroughs will continue to negotiate Section 106 agreements with applicants which can provide funds or works to make development more acceptable in planning terms. The Neighbourhood Forum will liaise with Brent and Camden Boroughs as to the most appropriate form of Section 106 agreement relating to applications within the Neighbourhood Plan area. Brent¹⁹ and Camden²⁰ has also published guidance on

¹⁶ <https://www.brent.gov.uk/media/16415179/annual-cil-rate-summary-2020.pdf>

¹⁷ <https://www.camden.gov.uk/documents/20142/1267599/1.11+Planning+Contributions+CPG.pdf/63d59c2e-e212-3181-e29f-d16e91f3c411?t=1585930038197>

¹⁸ <https://www.camden.gov.uk/documents/20142/1267599/LCIL+Priority+List+2023-26.docx.pdf/f3a7fa7d-e3f7-f2e0-9100-199742d81da6?t=1681490735971>

¹⁹ https://legacy.brent.gov.uk/media/16420407/brent-planning-obligations-supplementary-planning-document.pdf?_ga=2.144994608.507933880.1674464490-637893275.1620207509

²⁰ <https://www.camden.gov.uk/documents/20142/1267599/1.11+Planning+Contributions+CPG.pdf/63d59c2e-e212-3181-e29f-d16e91f3c411?t=1585930038197>

infrastructure contributions which outlines the scope and range of infrastructure towards which the Borough may seek contributions from developers and landowners in order to make development acceptable in planning terms.

9. Next Steps

9.1 This is the draft version of the Neighbourhood Plan for Kilburn. It will be subject to a period of formal consultation lasting for six-weeks (known as 'Regulation 14' consultation) and any necessary amendment made following review of feedback before it is submitted to Brent and Camden Boroughs who will start the 'examination process'.

9.2 Brent and Camden Boroughs will formally consult on the submission version of the Neighbourhood Plan. The Officers and the Neighbourhood Forum select the independent examiner, who will be appointed by the Councils to review the Plan and any comments made in response to it. Following this, the examiners will issue a report to the Borough Councils advising whether:

- The Plan should proceed to referendum.
- The Plan should proceed to referendum subject to modification.
- The Plan should not proceed to referendum.

9.3 For the examiner to advise that the Plan proceed to referendum it will need to be demonstrated that the Plan meets what are called the 'Basic Conditions'. These include showing that the Plan is in general conformity with the strategic objectives of the Local Development Plan (i.e.: the Brent and Camden Local Plans).

9.4 Brent and Camden Boroughs will organise the referendum. All people of voting age in the designated Neighbourhood Plan area are eligible to vote on whether the Plan should be brought into force ('made') or not. If more than 50% of all people who turnout vote in favour of making the Plan, then it will become part of the suite of planning policies used by Brent and Camden Boroughs to help shape and determine planning applications in Kilburn.

Appendix 1: Strategic Local Plan policies

This appendix presents strategic policies of relevance to the Neighbourhood Plan area as set out in the adopted Bent and Camden Local Plans.

Brent Local Plan

Strategic policies in the Brent Local Plan of relevance to the Kilburn area are:

- Policy BP6 South East:** This policy sets out a number of objectives relating to the growth of the South East of the Borough of Brent, within which Kilburn is located. Of particular relevance here is:
 - The requirement for a minimum of 348 new homes to be delivered in the Kilburn Neighbourhood Forum area in the period to 2041. While the Brent Local Plan does not allocate specific sites for the delivery of these homes, it is expected that a large proportion of this figure will be met through the Kilburn Square development. The remaining figure is expected to come forward on smaller sites in line with London Plan Policy H2: Small Sites.
 - Kilburn Square to be regenerated as part of a mixed-use development including re-provision of the market and a new public square
 - The commitment to enhance and protect Kilburn Town Centre's evening economy and comparison retail offer, including the creation of a food and drink cluster around the Kiln Theatre.
 - Provision of new comparison retail floorspace across the area, directed to Kilburn Town Centre in the first instance
- Site Allocation BSESA19 Gaumont State Cinema:** This site is a Heritage Asset of national importance but is currently underutilised. The site allocation suggests that by increasing its use for cultural, leisure and community activities, development would contribute to the vibrancy of Kilburn Town Centre and its night time offer.
- Site Allocation BSESA20 Kilburn Square:** Kilburn Square is a prominent site on Kilburn High Road, featuring a mix of land uses, including a market. Any development on the site must provide a new public square, market, and replace the health centre with an alternative use that meets community needs.
- Policy BE3 Local Employment Sites and Work-Live:** This policy aims to maintain the amount of affordable workspaces within the emerging Kilburn creative cluster.

- Policy BE4 Supporting Strong Centres:** This policy seeks to manage the diversity of uses in town centres (such as Kilburn), and encourages the use of vacant/under-utilised sites by temporary uses that will benefit the town centre's vitality and viability.
- Policy BE9 Visitor Accommodation and Attractions:** Through this policy, the local plan notes that Kilburn has relatively limited hotel provision and encourages future hotel provision to be provided in the two major town centres of Wembley and Kilburn.
- Policy BHC3 Supporting Brent's Culture and Creative Industries:** Aims to ensure that creative industries are supported through the development of improved and additional creative workspaces, cultural facilities and other mutually complementary uses. Existing clusters of creative workspaces in Harlesden, Kilburn, Willesden Green, Queen's Park and Wembley will be protected and promoted
- Policy BHC4 Brent's Night Time Economy:** The Kilburn High Road is an important hub of night time activity within Brent, with the London Plan identifying the Night Time Economy of Kilburn High Road as 'more than local importance'. This policy ensures that development impacting upon the night-time economy must preserve or enhance its function within the London Plan town centre hierarchy, which lists Kilburn as a major centre, below metropolitan and international centres.
- Policy BHC5 Public Houses:** This policy strongly supports the retention of existing pubs and the development of new pubs in town centres. Any pubs seeking a change of use are required to demonstrate a need to do so based on a set of criteria provided by the policy.
- Policy BGI1 Green and Blue Infrastructure in Brent:** The policy notes that Kilburn has a deficiency of public open space, and that this will need to be addressed by major residential development by maximising the onsite provision of a range of publicly accessible open spaces for a range of users.
- Policy BD1 Leading the Way in Good Urban Design:** This policy states all new development must be of the highest architectural and urban design quality. Innovative contemporary design will be supported where it respects and complements historic character but is also fit for the future. In delivering high quality design, development proposals will be expected to show how they positively address all the relevant criteria within London Plan design policies and the Brent Design Guide SPD1.
- Policy BD2 Tall buildings:** This policy states in intensification corridors and town centres outside conservation areas and areas of distinctive residential character developments of a general building height of 15 metres above ground level could be acceptable, with opportunities to go higher at strategic points in town centres.

In addition to the strategic policies outlined above, the non-strategic **Policy BE5: 'Protecting Retail in Town Centres'** is also of relevance. This policy imposes a number of restrictions on betting shops, adult gaming centres, pawnbrokers, takeaways, and Shisha Cafes.

Camden Local Plan

Strategic policies in the Camden Local Plan of particular relevance to the Plan area are:

- **Policy G1 Delivery and Location of growth:** The policy notes that significant growth is to be delivered at some of the highly accessible locations in the borough, of which Kilburn High Road is listed.
- **Policy H2 Maximising the Supply of Self-contained Housing from Mixed-Use:** This policy suggests that on Kilburn High Road, any development which is over 200 sqm will require 50% of all additional floorspace to be self-contained housing.
- **Policy C1 Health and Wellbeing:** The policy identifies Kilburn as a ward suffering from poor levels of health and wellbeing. The policy therefore aims to ensure that wherever possible, measures are incorporated into development which contribute towards healthier communities and reduce health inequalities.
- **Policy C4 Public houses:** Public houses are important to the character of Kilburn, this Local Plan Policy seeks to protect all public houses which are of community, heritage or townscape value by not granting planning permission for proposals for the change of use, redevelopment and/or demolition of a public house unless there are exceptional circumstances
- **Policy TC2 Camden's centres and other shopping areas:** This policy seeks to promote successful and vibrant centres. It promises to protect and enhance the role and unique character of Camden's centres (such as Kilburn) by ensuring new development is of an appropriate scale and character. The policy also seeks to make sure that food, drink, entertainment, and other town centre uses do not have a harmful impact on residents and the local area
- **Policy TC4 Town Centre Uses:** This Policy seeks to ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours.
- **New Local Plan:** Camden consulting on Draft new Local Plan in early 2024
- **Policy E3 Tourism:** This policy supports allowing smaller-scale visitor accommodation in the town centres of Camden Town, Kilburn, West Hampstead, Kentish Town and Finchley Road/Swiss Cottage.
- **Policy D1 Design:** This Policy seeks to secure high quality design in development, which among other criteria, respects local context and character, preserves / enhances the historic environment and heritage assets and integrates well with the surrounding streets and open spaces, improving movement through the site and wider area. The policy also ensures that public artworks will be permitted where they protect and enhance the local character and historic environment and contribute to a harmonious and balanced landscape design.
- **Policy D2 Heritage:** This policy aims to preserve and enhance Camden's heritage assets.
- **Policy CC3 Water and Flooding:** Suggests that Kilburn suffers from groundwater flooding. Any new development must consider this and make mitigations.

There are a number of other strategic policies not listed here, including affordable housing, open space and transport that may be relevant.

It is to be noted that Camden has published a new Local Plan in 2024.²¹

²¹ <https://www.camden.gov.uk/draft-new-local-plan>

Appendix 2: Kilburn's Local Heritage

This appendix presents a summary of the heritage assets within the Neighbourhood Plan area. Kilburn is an area rich in local heritage features and assets. The Neighbourhood Plan Area contains eight different conservation areas:

1. South Hampstead (partially)
2. Alexandra Road (Partially)
3. Priory Road
4. South Kilburn (partially)
5. St. Johns Wood
6. Paddington Old Cemetery
7. North Kilburn (extension proposed 2023)
8. Kilburn (proposed 2023)

Recognising the importance of these conservation areas is crucial to understanding and seeking to protect Kilburn's character, particularly as there are no conservation areas on the High Road itself, meaning the designation of the conservation areas plays an important role in maintaining the character of Kilburn's residential areas. It is to be noted that the proposed conservation areas of both North Kilburn and Kilburn conservation areas will, if approved, extend to the High Road.

The area is also home to Fifteen listed buildings:

1. The Black Lion – Grade II. An imposing corner plot, 274 Kilburn High Rd
2. The National Club – Grade II (United Kingdom Children of God)
3. Gaumont State Cinema – Grade II* (Ruach Ministries)
4. Goetze Grave – Grade II listed building located in Paddington Old Cemetery Non-Civil Parish - 1389534 Historic England
5. The Chapels at Paddington Old Cemetery – Grade II
6. Mecca Social Club, Carlton Rooms - Maida Vale – Grade II (Islamic Community Centre)
7. 1, 1A, 1B and 1C Greville Place – Grade II
8. 3, 3A Greville Place – Grade II
9. 5, 5A Greville Place – Grade II
10. 24, 26, 26A Greville Road – Grade II
11. 37 Regency Lodge, Greville Road – Grade II
12. 13 -19 Greville Place – Grade II
13. Alexandra Road Estate – Grade II*
14. Former Alexandra Road School, Ainsworth Way and Alexandra Resource Centre- Rowley Way – Grade II
15. Loudoun Road housing, shops and craft workshops, comprising North block (61-83 Loudoun Rd, 1-8 Langtry Walk) and South Block (49-59 Loudoun Road, 2-62 Alexandra Place) – Grade II*

As a public house, the Black Lion could be subject to further protection as an Asset of Community Value. Kilburn has already witnessed the loss of a considerable amount of its pubs, and efforts should be taken to retain the last of its existing ones, especially The Black Lion, situated in an

imposing corner plot Grade II * listed building and listed by CAMRA as having a historic pub interior of national importance.

There are also 22 locally listed buildings within the Plan boundary.

1. 351-353 Kilburn High Road
2. 345 Kilburn High Road
3. 315 & 317 Kilburn High Road
4. 157 Kilburn High Road
5. 127-131 Kilburn High Road Trinity Mansions and shops
6. 77 Kilburn Bridge Pub, Kilburn High Road
7. Priory Road Conservation Area- Boundary Road
8. 131 Kilburn High Road
9. 187-193 Kilburn High Road
10. Jubilee (Metropolitan) railway bridge (forms the arches along Maygrove, Iverson Rd)
11. 330 – 334 Kilburn High Road
12. 308 Kilburn High Road
13. 1-31 Oppidan Apartments, 25 Linstead Street
14. Kilburn Grange Park - Kilburn High Road
15. 105 – 107 Kingsgate Rd
16. 1-8 Smyrna Mansions, Smyrna Road
17. Roman Catholic Church of the Sacred Heart
18. 2 West End Lane
19. Ebenezer Baptist Chapel, Kilburn Vale
20. Priory Works, 252 Belsize Lane
21. 254- 256 Belsize Road
22. 11 Springfield Walk



Figure 10. Listed buildings in the Plan Area

Glossary of Terms

Adoption – The final confirmation of a development plan by a local planning authority.

Affordable Housing - Includes social rented, affordable rented, and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provisions. A full definition is available in the NPPF.

Brownfield Site – See Previously Developed Land.

Conservation Area - an area of special architectural & historic interest, the character or appearance of which is preserved by local planning policies and guidance.

Department for Levelling Up, Housing and Communities (DLUHC) - is the Government department with responsibility for planning, housing, urban regeneration, and local government. Previously known as the Ministry for Housing, Communities and Local Government (MHCLG), and, prior to that, the Department for Communities and Local Government (DCLG).

Development Plan - In this context includes the London Plan, the adopted Camden, and Brent Local Plans and any future adopted Local Plans which may replace them and Neighbourhood Development Plans which are used to determine planning applications.

Evidence Base - The background information that any Development Plan Document is based on and is made up of studies on specific issues, such as housing needs for example.

Greenfield Site - Land where there has been no previous development, often in agricultural use

Green Infrastructure – A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Includes those parts of an area that are occupied by natural open space, parkland, woodland, sports fields, gardens, allotments, and the like.

Housing Associations / Registered Social Landlords / Registered Providers – Not-for-profit organisations providing homes mainly to those in housing need

Independent Examination - An assessment of a proposed Neighbourhood Plan carried out by an independent person to consider whether a Neighbourhood Development Plan conforms with the relevant legal requirements.

Infrastructure – Basic services necessary for development to take place, for example, roads, electricity, sewerage, water, education, and health facilities.

Infill Development – small-scale development filling a gap within an otherwise built-up frontage.

Listed Building – the building of special architectural or historic interest.

Local Planning Authority - Local government body responsible for formulating planning policies and controlling development; a district council, metropolitan council, county council, unitary

authority, or national park authority. For Kilburn, this is both the Borough of Brent and the Borough of Camden.

Neighbourhood Development Plan – A plan prepared by a Town or Parish Council (or Forum) for a particular Neighbourhood Area, which sets planning policies.

Permitted Development – comprises certain categories of minor development as specified in the General Permitted Development Order, which can be carried out without having first to obtain specific planning permission.

Planning Permission - Formal approval granted by a council (e.g. Brent or Camden) in allowing a proposed development to proceed.

Previously Developed Land - Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

Public Open Space - Open space to which the public has free access.

Public Realm - Those parts of a village, town, or city (whether publicly or privately owned) available, for everyone to use. This includes streets, squares, and parks.

Section 106 Agreement – Planning obligation under Section 106 of the Town & Country Planning Act 1990, secured by a local planning authority through negotiations with a developer to offset the public cost of permitting a development proposal.

Soundness – The soundness of a statutory local planning document is determined by the planning inspector against four criteria:

- *whether the plan is positively prepared* (as a minimum, seeks to meet areas objectively assessed needs),
- *justified* (founded on robust and credible evidence and be the most appropriate strategy),
- *whether the plan is effective* (deliverable, flexible and able to be monitored), and
- *whether it is consistent* with national and local planning policy.

Stakeholder – People who have an interest in an organisation or process including residents, business owners, and national organisations, and government departments

Sustainable Development – An approach to development that aims to allow economic growth without damaging the environment or natural resources. Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

Sustainable Urban Drainage Systems – Sustainable drainage systems slow the rate of surface water run-off and improve infiltration, by mimicking natural drainage in both rural and urban areas. This reduces the risk of “flash-flooding”.

Use Classes Order – The Town and Country Planning (Use Classes) (Amendment)

(England) regulations 2020 puts uses of land and buildings into various categories known as ‘*Use Classes*’. These regulations came into force on 1st September 2020 and effectively nullify the former use class definitions used within the Town and Country Planning (Use Classes) Order 1987.

It is generally the case that you will need planning permission to change from one use class to another, although there are exceptions where the legislation does allow some changes between uses. It should be noted that the recent regulation changes led to *former Use Class A* (shops, financial and professional services, and food and drink establishments) becoming part of the *new Use Class E*.

B2 use the class: Refers to general industry

B8 use class: Refers to storage and distribution

C1, 2, 2A, 3, 4 use class: Refers to hotels and residential institutions, secure residential institutions, dwellings and House in Multiple Occupations (HMOs)

E use class: Refers to shops, restaurants, financial and professional services, indoor sport, recreation or fitness (not involving motorised vehicles or firearms, health or medical services, creche, nursery or day centre principally to visiting members of the public, an office, research and development, or any industrial process that can be carried out in any residential area without detriment to amenity.

Acknowledgments

Acknowledgements

Drafting the Kilburn Neighbourhood Plan has been and continues to be a collective effort reflecting the opportunities and challenges in Kilburn’s past, present and future. Unsurprisingly it has been a longer journey than anticipated, not least due to the physical and emotional constraints caused by Covid 19. We thank all those volunteers who have served on the steering group and committee since 2014.

While there are too many members to name individually, we must acknowledge the contribution of Peter Williams, the Forum’s first chair (and the then chair of Kingsgate Community Centre). Peter responded to a local call to form a Neighbourhood Plan Forum (NPF) as a way of joining up the network of proactive tenants, residents and community organisations in Kilburn. We

thank Peter for his wisdom and leadership and for his ongoing support of neighbourhood planning.

From the outset we have benefitted from the guidance of Brent and Camden planning officers. We particularly thank Claire (Jones) Bradley and Paul Lewin (Brent); and Kate Goodman and Brian O’Donnell (Camden) for their experience in neighbourhood planning forums.

The Tenants and Residents and Community Associations are a mainstay in providing local knowledge and developing vision and practical projects. We would particularly like to thank the following:

- Webheath Tenants and Residents Association
- Brondesbury Residents and Tenants (BRAT)
- Brent Eleven Streets (BEST)
- Kilburn Village Association (KVA)
- Kilburn Older People Exchange (KOVE)
- Alexander and Ainsworth, Rowley Way Tenants and Residents Association


- South Hampstead and Kilburn (SHAK)
- Mortimer Crescent Tenants and Residents Association
- Abbey Community Centre
- Friends of Kilburn Grange Park

We have been extremely fortunate in our links with the Anglia Ruskin University and University College London (UCL), (Bartlett School of Planning) and their planning departments who have designed post-graduate student projects based on creating a Kilburn Neighbourhood Plan. We thank Grace Nelson, (Brent) and Elena Besussi (UCL, Bartlett School) & Francesca (Middlesex University, London) for inspiring their students to produce some ambitious, creative, and forward-looking plans which in turn have inspired our plan drafting.

We have benefited from the support of professional consultants at key times. At the beginning of the process, we were guided by Lorraine Hart from Locality in forming the Forum as an organisation, and in the most recent period, Jon Herbert and colleagues in Troy Planning and Design wrote the first version of the draft plan. We also wish to thank members of Highgate and West Hampstead NPFs for sharing their experiences and providing guidance in our early days.

Finally, but by no means least, we acknowledge the support from Locality for funding the administration and research of the Forum and for providing access to the expertise of AECOM for two detailed reports. We also thank the Trust for London for grant aid which continues to enable the work of the Forum to continue.

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	Cabinet 19 May 2025
	Report from the Corporate Director of Neighbourhoods and Regeneration
	Lead Member - Cabinet Member for Public Realm and Enforcement
Draft Brent Tree Strategy	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	One Appendix A: Draft Brent Tree Strategy
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Julie Hughes – Principal Tree Officer 020 8937 2062 Julie.Hughes@brent.gov.uk John Stiles – Placemaking Manager 020 8937 3568 John.Stiles@brent.gov.uk

1.0 Executive Summary

- 1.1. The purpose of this report is to seek approval for public consultation on the Draft Brent Tree Strategy document.

2.0 Recommendation(s)

- 2.1 Cabinet approves consultation on the Draft Brent Tree Strategy document as set out in Appendix A.
- 2.2 Cabinet delegate consideration of the consultation responses, any necessary changes and the decision to adopt the final Brent Tree Strategy to the Cabinet Member for Public Realm and Enforcement.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 Brent's Draft Brent Tree Strategy sets out the way the council will continue to manage and enhance trees across the borough as part of our commitment to tackling the climate emergency and building a greener Brent. This report will support and supplement a number of strategies already in place to reduce our carbon footprint and work towards net zero targets, including the council's Climate and Ecological Emergency Strategy (2021-2030), the Brent Local Plan (2019-2041), Climate Adaptation and Resilience Plan, Green Infrastructure Vision, Equity Diversity and Inclusion Strategy (2024-2028), Air Quality Action Plan (2023-2027) and Tree Management Policy (2017).
- 3.1.2 Brent has many parks, green spaces, and tree-lined streets – all of which offer not only aesthetic value, but countless environmental, health, economic, and social benefits as we integrate the natural world into our urban environment. Building on the Tree Management Policy (2017), the council will continue to recognise the important role trees, open spaces, and woodlands play in promoting recreation and public health, while balancing our legal responsibilities to maintain environmental stock in line with local and national policy frameworks.
- 3.1.3 As part of Brent's commitments to sustainable development and improving the environmental wellbeing of the borough, this report proposes to develop the council's current approach to tree management and tree planting, maximising the impact that urban trees have on the environment and the lives of people living and working in Brent. Given this widespread impact, the council will seek to undertake engagement and consultation with residents, community groups, volunteer groups, schools, and local businesses to co-produce a constructive and financially responsible action plan.
- 3.1.4 This refreshed approach will have a particular focus on increasing canopy cover, improving tree equity, and targeting those areas of highest priority need. This work will assist in delivering all the Borough Plan's priorities, but in particular those focused on 'A Cleaner, Greener Future' and a 'Healthier Brent'.

3.2 Background

- 3.2.1 The Draft Brent Tree Strategy sets out its context in relation to all related documents and recognises the positive impact that urban trees have on communities. It goes on to explain how our approach can be developed to ensure where possible we protect the trees that we already have, and that we maximise any increase in tree canopy cover, particularly focussing on areas of existing low canopy cover and creating equal access to the benefits of trees across the borough.
- 3.2.2 It describes the importance of trees in Brent and how they relate to the situation in Greater London. It explores their importance in the context of environmental designations and the essential role that trees play in the urban landscape for improving air quality, reducing urban heat island effect and interception of rainfall.

- 3.2.3 It discusses detail of species in relation to Brent's street tree population and how we can build species resilience both with the management of our trees and new planting. Canopy cover is then explored, in a borough wide context and canopy cover targets identified in a national and London context and how this could translate to Brent.
- 3.2.4 It identifies trees owned by the council and advises of the key departments who are responsible for managing them. It identifies how trees are surveyed and managed and the sorts of issues that put pressure on the Council to undertake tree works, such as risk of subsidence damage.
- 3.2.5 It goes onto explore the idea of tree equity and how all communities should have equal access to the benefits of trees and the benefits they offer to public health and wellbeing. The LSOAs (Lower Super Output Areas) where there is both the highest and high priority for tree planting as identified using <https://uk.treeequityscore.org/> and these are identified as priority areas for tree planting.
- 3.2.6 How trees contribute to biodiversity in urban areas is identified and how street tree planting can play a crucial role in improving wildlife links and connectivity between green spaces and along streets; and how this together with the promotion of active travel can also bring nature closer to the places where people live, work and learn.
- 3.2.7 It identifies trees of importance that may be privately owned and explains a little regarding the protection of trees with Tree Preservation Orders, and in the more historical context of designated Conservation Areas.
- 3.2.8 It relates also to development and how important it is that existing trees of significance are retained where possible on development sites which together with the planting of new trees increase canopy cover over time to improve the urban environment. Policies on tree protection are included within the Brent Local Plan (2019-2041). The recent Defra Biodiversity Net Gain (BNG) metric now requires a 10% net gain of biodiversity on most development sites, and this includes tree habitats. Trees and Woodlands will also be a major consideration in the production of our Local Nature Recovery Strategy (LNRS).
- 3.2.9 It explores our approach to tree planting, maintaining tree cover and increasing tree cover wherever this is possible, both within council sites and on other land wherever this can be achieved. We hope to be able to not only continue to work with existing community groups but also to foster new opportunities for the council and local communities to work together.
- 3.2.10 When we work successfully with community groups it is likely that there will be greater opportunities to obtain external funding through various sources, including from NCIL and s.106 agreements.
- 3.2.11 The action plan towards the end of the document defines a series of aims, supported by specific and measurable actions the council aspires to deliver on, that can be monitored and evaluated over time.

3.3 Consultation

- 3.3.1 It is essential that we engage with residents, community groups, volunteer groups, schools, and local businesses and seek their views and comments on the strategy before we adopt it. The document will be issued for consultation for at least 6 weeks. It will be promoted on our website. A copy of the Draft Brent Tree Strategy will be placed at each of our libraries. The ability to comment will be provided on the citizen engagement platform, as well as separately in writing.

3.4 Next Stages

- 3.4.1 Following the consultation, officers will consider the responses and recommend any appropriate changes necessary to the final Brent Tree Strategy. To reduce Cabinet business, if no substantive issues are raised which require Cabinet consideration, it is recommended that Cabinet delegate authority to the Cabinet Member for Public Realm and Environment to consider the responses, any necessary changes and the final adoption of the Brent Tree Strategy.

3.5 Options

- 3.5.1 There are essentially two options open to the Council.:

- a) Take forward a Draft Brent Tree Strategy, or
- b) Do not take forward a Draft Brent Tree Strategy.

Option a) Take forward a Draft Brent Tree Strategy

- 3.5.2 In this scenario, it is considered that all matters relating to trees will be accessible within the same document and will provide clear information on trees, policies relating to trees, canopy cover and working towards tree equity.
- 3.5.3 Option a) is recommended, with the Draft Brent Tree Strategy issued for consultation. Ultimately if adopted, the strategy will provide information relating to trees in one place and will help to encourage different teams across the council to work together more effectively.

Option b) Do not take forward a Draft Brent Tree Strategy

- 3.5.4 In this scenario, the Council is likely to retain and potentially increase the divergence between the working of teams which have an impact on trees. While the existing 2017 Tree Policy will remain, there will be no document that holistically takes forward new approaches such as tree equity and recent legislative changes relating to BNG and brings them all into one document. As such, Option b) is not recommended.

4.0 Stakeholder and Ward Member Consultation and Engagement

- 4.1 All key internal stakeholders have been consulted in the development of the document over the past 18 months to ensure that the document aligns with both the work and the aims of all teams with an interest in trees, this has included Climate Emergency, Highways Management, Healthy Streets and Parking and Parks and Green Infrastructure. Individual briefings have occurred with the Leader, Cabinet Member for Public Realm and Enforcement and the Cabinet Member for Climate Action and Community Power.

5.0 Financial Considerations

- 5.1 There are no specific budgetary implications relating to this report, as it is anticipated that any actions arising from the strategy will involve spending of existing budgets and bidding for additional funds as they become available, including external grants, NCIL and s.106 funding. Trees are a form of green infrastructure and funding should normally incorporate maintenance costs essential for their long-term health.

6.0 Legal Considerations

- 6.1 There are no specific legal considerations other than set out in the main body of the report.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 The Draft Brent Tree Strategy will assist the Council to develop a positive approach between related teams to promote good tree management and increase canopy cover across the borough, with a focus on those areas with the highest priority need as identified by Tree Equity Score UK. This will positively impact upon a range of protected characteristics, helping to level the playing field for Brent residents, improving equity across the borough, and quality of life generally.

8.0 Climate Change and Environmental Considerations

- 8.1 The Draft Brent Tree Strategy will play a key role in our commitment to do all reasonable in our gift to aim for carbon neutrality for the borough by 2030 (Brent Climate & Ecological Emergency Strategy, 2021-2030).
- 8.2 In a borough such as Brent trees will make a much more significant contribution to climate adaptation and resilience than to climate change mitigation and will help our communities to become more resilient to the impacts of climate change through providing cool shelter and water attenuation and minimising the urban heat island effect.

9.0 Human Resources/Property Considerations (if appropriate)

- 9.1 None.

10.0 Communication Considerations

- 10.1 Support will be sought from the Communications team to publicise the consultation through a press release and notifications on the Council's social media accounts. It will feature on our website and on the citizen engagement platform. Members will be informed of the consultation through the Members' Bulletin. Individual groups that have an interest in environmental matters that the Council is aware of through its existing networks will also be notified.

Report sign off:

Alice Lester

Corporate Director

Neighbourhoods and Regeneration



Brent Tree Strategy

**Draft Planning
Strategy Document**

May 2025



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Consultation Statement

This draft Planning Strategy Document will be subject to a 16-week period of consultation. This will take place between 29th May and 18th September 2025. Consultation will be consistent with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement (SCI).

The document will be made available on the council's website, as well as in Brent Council libraries. The council will promote it through general awareness raising undertaken through media releases, its social media pages and on its website. In addition, the council will notify all relevant people and organisations on its planning policy consultation database. It will also make all landlords in the borough registered with it, aware of the consultation.

Representations on the document can be made to:

planningstrategy@brent.gov.uk

Alternatively, you can write to:

Julie Hughes, Principal Tree Officer
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

Representations should be received by the council by midnight 18th September 2025. Please reference the appropriate section and paragraph of the document for each individual comment that you make. Please note that the council will not register anonymous responses. You should provide your name and if relevant, the organisation that you are working for, and that which you might be representing.

When reporting the consultation responses, organisation names will be referenced by the council. However, no individual's name or personal details of respondents will be made publicly available. Please can you indicate with your response whether you wish to be informed by the council of whether this document is adopted. Please also indicate if you would like to be informed of other planning policy consultations by having your details put on our planning policy consultation database. This information will only be used in relation to consultations on the council's planning and associated documents. Unless you indicate that you want to be put on this database, your personal details will only be kept until the council makes a decision on whether to proceed with the adoption of the document or not and has subsequently issued the appropriate notifications. Please see our [privacy policy](#) for more details.

Contents

1. Introduction	3
1.1 Overview	4
2. Importance of Trees in Brent	6
2.1 Overview	7
2.2 The Benefits of Trees	8
2.3 Street Trees	10
2.4 Tree Canopy Cover	12
2.5 Tree Equity	13
2.6 Air Quality	16
2.7 Carbon Storage and Sequestration	16
2.8 Stormwater Regulation	17
2.9 Biodiversity	18
3. Approach to Tree Planting	19
3.1 Overview	20
3.2 Maintaining Tree Canopy Cover	20
3.3 Increasing Tree Canopy Cover	21
3.4 Increasing Partnership Working	21
3.5 Funding	22
3.6 Species Resilience	23
4. Council Tree Management	25
4.1 Trees on Highways	26
4.2 Trees in Parks, Open Spaces, Cemeteries and Allotments	26
4.3 Trees on Brent Housing Management Estates	27
4.4 Reducing the Potential for Tree Related Building Damage	28
5. Privately Owned Trees	29
5.1 Trees on Private Land	30
5.2 Care and Maintenance of Private Trees	30
5.3 Protected Trees	31
5.4 Trees Owned by Public Authorities	31

6. Planning & Development	32
6.1 Overview	33
6.2 Action Plan	34
7. Appendices	36
7.1 Appendix 1: National, Regional and Local Tree-Related Planning Policy	37
7.2 Appendix 2: Air Quality Focus Areas	39
7.3 Appendix 3: Tree Canopy Cover in Brent by Ward	41
7.4 Appendix 4: Flood Risk Zones	43
7.5 Appendix 5: Bibliography	44

1. Introduction

1.1 Overview

- 1.1.1 The urban forest comprises all the trees in the urban realm – in public and private spaces, along streets, roads and waterways, and in amenity areas, such as parks. It contributes to the green infrastructure network and the wider urban ecosystem. It also provides numerous benefits to human society, and it does so in vast quantities.
- 1.1.2 This Tree Strategy supports the council's ambition to become one of the greenest and most biodiverse boroughs in London. It plays a key role in our commitment to do all that is reasonable and within our gift to achieve carbon neutrality for the borough by 2030.¹
- 1.1.3 We aim to achieve this in part through developing a collaborative approach to the management of our own tree stock, and through the promotion of best practice in tree and woodland management.
- 1.1.4 It also complements the council's Climate and Ecological Emergency Strategy (2021-2030), Climate Adaptation and Resilience Plan, Green Infrastructure Vision, Brent Local Plan (2019-2041), Air Quality Action Plan (2023-2027) and Tree Management Policy (2017).
- 1.1.5 Trees and woodland form an integral part of the borough and the council manages over 19,000 street trees and 482 hectares of green space across Brent. We recognise the positive impact that urban trees have on the environment and the lives of people living and working in the borough and we aim to protect our existing trees and woodlands in order to maximise their benefits.
- 1.1.6 Tree canopy cover can be defined as the area of leaves, branches, and stems of trees covering the ground when viewed from above.² Research suggests that even moderate increases in tree canopy cover within cities can aid adaptation to the adverse effects of climate change.
- 1.1.7 Across London, the GLA has set a target to increase tree canopy cover to achieve 23% by 2050; approximately 3,300 hectares additional coverage.³ The most effective way to maintain and increase our tree canopy cover is by improving the health and condition of existing trees to maximise their vitality, optimise growth and safeguard their future by allowing them to grow to their full potential.
- 1.1.8 In Brent, the average tree canopy cover is 15.28% and varies from 10.79% in Kingsbury and Tokyngton wards to 27.47% in Barnhill ward. This compares with a national average of 16% and a London average of 21%.

1. Brent Climate and Ecological Emergency Strategy 2021-2030

2. Grove et al., 2006

3. London Urban Forest Plan (2020)

- 1.1.9 This Tree Strategy will help us protect existing trees, as well as provide a resource management strategy for their long-term replacement and the proficient establishment of new trees. This is to ensure tree canopy cover is increased over time, particularly in areas of multiple deprivation and where existing tree canopy cover is low. These areas are often home to the most vulnerable of our residents. It is particularly important in these areas that local communities are empowered to support us in facilitating the necessary change.
- 1.1.10 This Tree Strategy has been drafted in response to national, regional and local policy. It outlines how the council intends to maintain a healthy, diverse, and resilient urban forest across the borough and manage its responsibilities and legal obligations.
- 1.1.11 The key challenges to be addressed by this Tree Strategy are set out below:
- **Thinking in the long term:** considering the environmental changes anticipated over the next 50 years to allow more effective planning and continuity of approach.
 - **Integrating strategies and plans to align actions:** ensuring that climate change and pest and disease management is considered during revisions of all relevant policies and strategies.
 - **Prioritising tree health:** improving the health and condition of Brent's existing trees is a high priority. New planting is crucial but only represents a small proportion of Brent's urban forest and it will take a long time before delivering the extensive benefits that existing trees are already providing.
 - **Expanding and enhancing tree canopy cover:** improving the health and condition of existing trees to maximise their vitality, optimise extension growth and safeguard their future, as well as the establishment of new trees.
 - **Maximising funding opportunities:** including ways of securing future revenue costs for proactively managing trees.
 - **Adopting strong biosecurity practices throughout trees' lifecycle:** embedding strong biosecurity policies and practices throughout the process including procurement, specification, planting, auditing, establishment and maintenance. Encouraging familiarity with signs of ill health in trees and reporting via TreeAlert.
 - **Embracing the power of local communities:** voluntary and community groups already provide an incredible amount of support to the management of Brent's urban forest, often entirely on their own initiative. The commitment, intimate local knowledge and passion that local people can offer is an invaluable resource that should be nurtured and supported.

2. Importance of Trees in Brent

2.1 Overview

- 2.1.1 Brent has a limited number of nationally recognised ecological and built-environment designations, which include a Site of Special Scientific Interest (SSSI) at Brent Reservoir and Local Nature Reserves (LNRs) at the Welsh Harp, Fryent Country Park, and Mason's Field. In addition, it has Sites of Importance for Nature Conservation (SINCs), with some following linear corridors, such as the River Brent and its tributaries, railway lines and the Grand Union Canal.
- 2.1.2 Currently when compared to London standards, the borough lacks open space, particularly in the south. The quality of provision also varies. Brent has some parks and open spaces recognised as being of high quality. These attain the green flag standard and win other awards such as London in Bloom. It also, however, has some that don't perform so well.
- 2.1.3 Brent contributes to the natural green space and tree canopy cover of Greater London. Modern day pressures of increased development and urbanisation mean that we must recognise the essential role that the presence of mature trees play in our ever- evolving urban landscape in removing airborne pollutants, providing shade, reducing flooding and improving the quality of our urban environment.
- 2.1.4 Not only do trees contribute significantly to the visual character and appearance of our urban environment, but they offer numerous biodiversity and public health benefits which can help improve both our physical and mental wellbeing.

2.2 The Benefits of Trees

- 2.2.1 Trees bring many social, environmental, economic and health benefits to an urban area such as Brent. Through the appropriate retention, maintenance and replanting of trees we will ensure we continue to provide these benefits, enable a proactive response to climate change and ensure that Brent continues to be a desirable place to live, work and visit.
- 2.2.2 The environmental benefits of trees include, but are not limited to:
- Improving air quality by removing carbon dioxide from the air and converting it to oxygen (carbon sequestration).¹
 - Cleaning our air by absorbing other pollutants and toxins.²
 - Reducing of urban heat island effect and providing shade.³
 - Aiding flood relief by intercepting rainfall and thus decreasing run-off.⁴
 - Increasing biodiversity, contributing to ecosystems and providing a habitat for wildlife.
 - Contributing to green infrastructure and improving connectivity for wildlife.
- 2.2.3 The socio-economic benefits of trees include, but are not limited to:
- Helping to create attractive neighbourhoods, providing benefits to improve health and wellbeing, and thus contributing to reduced healthcare costs⁵ and helping to build stronger community cohesion.
 - Providing shelter, security, privacy and absorbing sound and thus reducing noise levels.
 - Helping to segregate sustainable transport routes.⁶
 - Increasing economic growth⁷ and prosperity⁸, as leafier environments increase dwell time with a consequent positive impact on local spend.
 - Incentivising businesses to pay higher ground rents.⁹
 - Being associated with higher earners and greater productivity.¹⁰
 - Supporting long term desirable neighbourhoods with reduced crime.¹¹
 - Being an accessible educational resource.

1. Tiwary et al., 2009; Kuhns 2008; McPherson 2007

2. Nowak et al., 2000

3. Gill et al., 2007

4. Hirabayashi 2012; Trees in Hard Landscapes (TDAG) 2014

5. Peachey et al, 2009

6. Davies et al., 2014

7. Rolls and Sunderland 2014

8. Wolf 2005

9. Laverne & Winson-Geideman 2003

10. Kaplan, 1993; Wolf 1998

11. Wolf 2007; Kuo & Sullivan (2001a, 2001b)

- 2.2.4 Trees appreciate with maturity; as their age increases, so does their value and contribution to health, wellbeing, wildlife, and the character of an area. We should never underestimate the value of established trees in the urban environment. The benefits that they provide will not be replicated by new planting for many decades.
- 2.2.5 According to the Brent i-Tree Eco Stratified Inventory Report (i-Tree Report), the borough's street tree population currently has:
- A value of £414 million using the CAVAT (Capital Asset Value for Amenity Trees) methodology.
 - A carbon storage capacity of 9,664 tonnes, with a calculated value of £2,455,422.
- 2.2.6 Annually, it provides a range of quantifiable benefits as set out in **Table 1**.

Table 1: Summary of the total annual benefits of trees

Total Annual Benefits		
Carbon sequestration	240 tonnes	£60,786
Pollution removal (including carbon monoxide (CO), ozone (O3), nitrogen dioxide (NO2), sulphur dioxide (SO2) and particulate matter)	4.5 tonnes	£308,272
Avoided stormwater run-off	8,223 cubic metres	£4,535
	Total annual benefits	£373,593

2.3 Street Trees

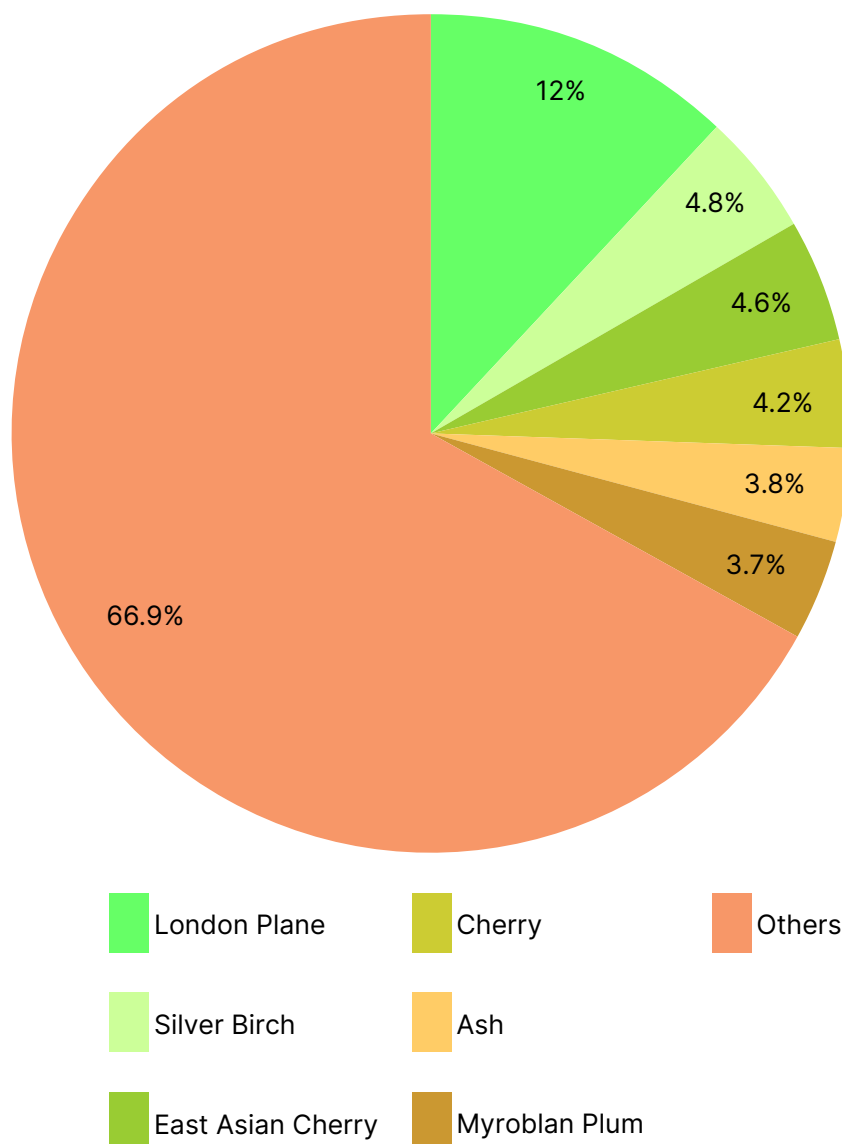
2.3.1 In 2020, the council commissioned an i-Tree Report.

2.3.2 This assessment provides data on the distribution, species, and canopy of street trees in Brent and their benefit to our local ecosystem. The analysis from this report has been used to support the development of this Tree Strategy.

Street Tree Population

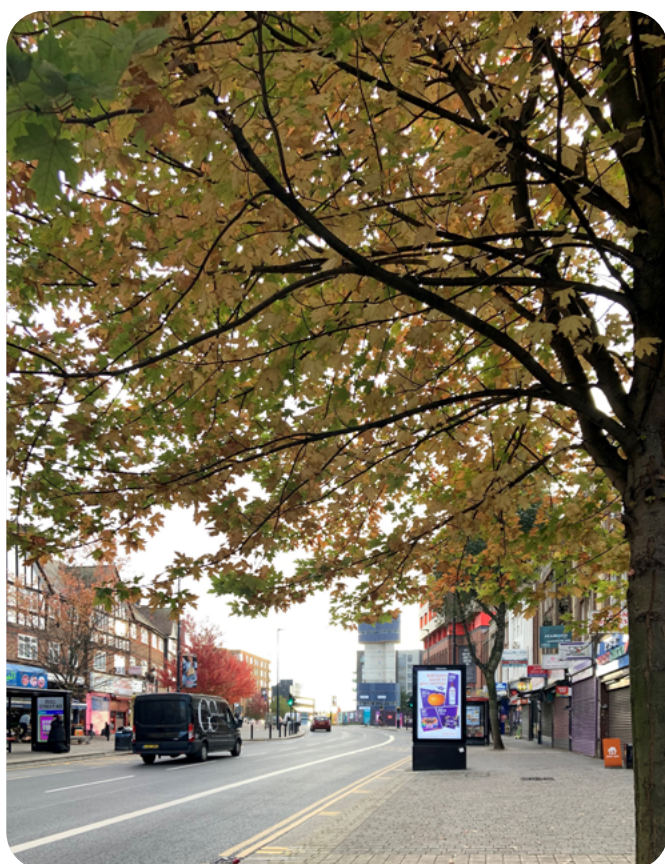
2.3.3 In Brent, there are over 19,000 trees comprising some 162 species. There is a rich species diversity, however more than 10% of the trees are London Plane (*Platanus x acerifolia*).

Figure 1: Percentage population of tree species



- 2.3.4 Like many urban areas, Brent would benefit from having a greater proportion of trees with larger canopies, as part of a diverse range of species to build resilience into its tree population and to reduce reliance on a small number of species.
- 2.3.5 We need to ensure we have enough large and mature trees to deliver the widest range of environmental benefits, however, we also need enough trees in a number of younger age classes to replace those mature trees as they eventually die.
- 2.3.6 The UN Sustainable Development Goal 11 is: ‘providing universal access to safe, inclusive and accessible, green and public spaces, in particular for women and children, older persons and persons with disabilities.
- 2.3.7 The rule stipulates that everyone should be able to see at least three trees from their home; there should be a minimum of 30% tree canopy cover in each neighbourhood, and 300 metres should be the maximum distance to the nearest high quality public green space.¹²

Figure 2: Street trees in Brent



12. Konijnendijk 2021

2.4 Tree Canopy Cover

- 2.4.1 The council also commissioned a Tree Canopy Cover Assessment in March 2020 to provide an overview of tree canopy cover across the borough. This provided a measurement of trees growing in parks and on private land together with those trees growing on highways-controlled land, as set out in the i-Tree Report.
- 2.4.2 Measuring tree canopy cover is essential for understanding the beneficial impact that trees will have on air quality, carbon storage and sequestration, urban heat island effect, temperatures and flood risk, collectively known as ecosystem services.
- 2.4.3 The more tree canopy cover there is, the more ecosystem services are provided. An increase in tree canopy cover is a policy target for both the government (Defra) and the Greater London Authority (GLA). The Defra target nationally is 17%.
- 2.4.4 Tree canopy cover in Brent as a whole is currently 15.28%.¹³ This is just below the national average of 15.8%¹⁴ and London average of 21%.¹⁵

13. <https://apps.london.gov.uk/green-cover/?layers=tree-canopy,green&pos=12.3/51.55574/-0.25822>

14. <https://www.forestresearch.gov.uk/research/i-tree-eco/uk-urban-canopy-cover/>

15. Valuing London's Urban Forest, Results of the London i-Tree Eco Project

2.5 Tree Equity

- 2.5.1 The climate emergency is the biggest global threat currently, and its impacts are not felt equally. Those communities facing poverty, deprivation and health inequalities are disproportionately affected by flooding, drought, extreme heat and poor air quality.
- 2.5.2 Tree equity is the idea that all communities should have equal access to the benefits of trees. Trees are essential to public health and wellbeing, yet not everyone has good access to trees and their benefits where they live.
- 2.5.3 Launched in 2023, the Tree Equity Score UK is a map-based application that was created to help address disparities in urban tree distribution by identifying the areas in greatest need of people-focused investment in trees.¹⁶ The tool was co-developed by American Forests, the Woodland Trust and the Centre for Sustainable Healthcare.
- 2.5.4 Tree Equity Score UK can be accessed at: <https://uk.treeequityscore.org/>
- 2.5.5 Tree Equity Score UK produces a score that highlights inequitable access to trees. The score is calculated at the neighbourhood level using LSOAs (Lower layer Super Output Areas) in England and Wales.¹⁷
- 2.5.6 LSOAs are defined by the ONS and comprise between 400 and 1,200 households usually with a resident population of between 1,000 and 3,000 people.
- 2.5.7 The score ranges from 0 to 100. The lower the score, the greater priority for tree planting. A score of 100 means the neighbourhood has enough tree coverage for the area. The priority levels within the tool provide an aid to help interpret the scores as set out in **Table 2**.

Table 2: Tree Equity Score UK scores and priority levels

Score	Priority
0-69	Highest
70-79	High
80-89	Moderate
90-99	Low
100	None

16. <https://uk.treeequityscore.org/>

17. <https://www.ons.gov.uk/methodology/geography/ukgeographies/censusgeographies/census2021geographies>

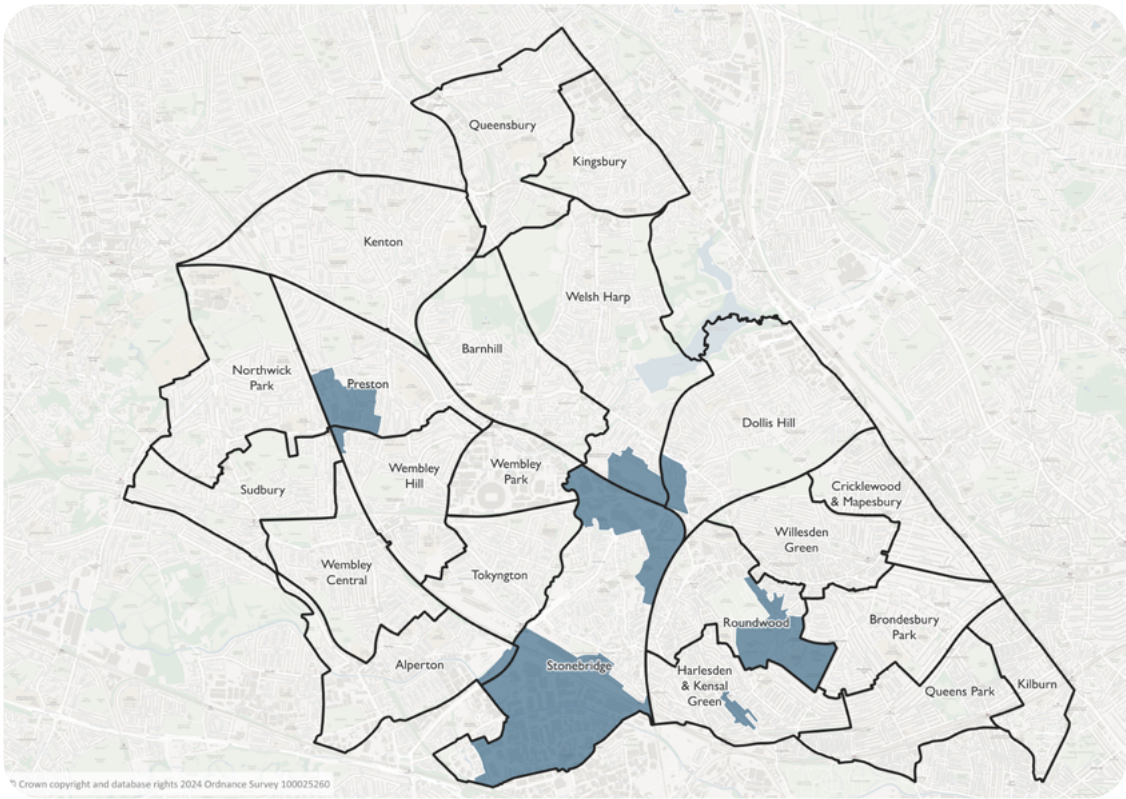
- 2.5.8 Brent has a composite score of 81 which is one of the lowest in London (ahead of the City of London at 76 and Barking and Dagenham at 80).
- 2.5.9 Out of 181 LSOAs across Brent, there are 62 that score below 79, highlighting the areas where tree planting is a high priority. Of those 62 LSOAs, there are six that score below 69, highlighting the areas where tree planting is the highest priority.
- 2.5.10 If we can increase tree planting and thus the score in these areas, we are likely to make the largest difference to tree equity in the borough overall.
- 2.5.11 Ensuring that we are planting climate resilient trees (those that can withstand extreme heat/flooding) and using them to assist with cooling/shading in areas which are at most risk from the urban heat island effect, we will be making the most positive impact. In doing this, we are also encouraging biodiversity and wildlife.
- 2.5.12 A breakdown of how tree equity scores are distributed amongst the 181 LSOAs across Brent is set out in Table 3.

Table 3: Distribution of Tree Equity Scores across Brent:

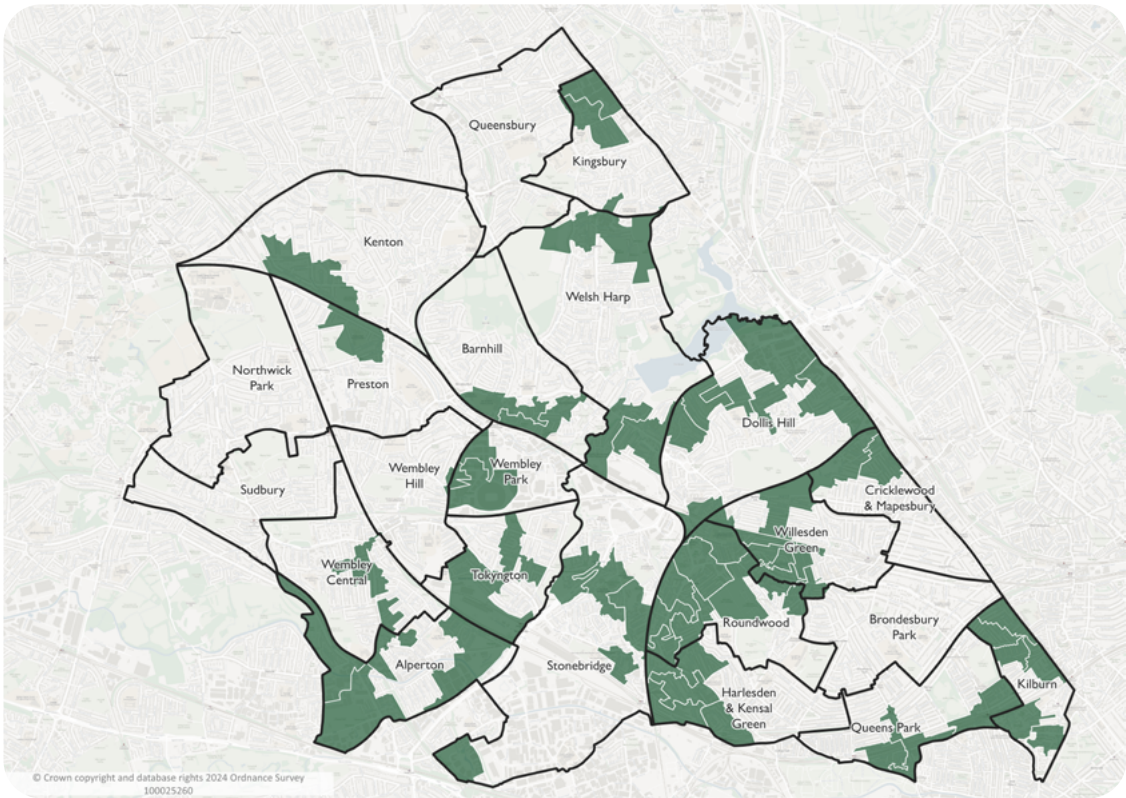
Score	Priority	Number of LSOAs
0-69	Highest	6
70-79	High	56
80-89	Moderate	87
90-99	Low	22
100	None	10

- 2.5.13 LSOAs where there is both the highest and a high priority for tree planting, based on the tree equity scores, are illustrated in **Map 1** and **Map 2** respectively.

Map 1: Brent LSOAs with highest need for tree planting (tree equity score 0-69)



Map 2: Brent LSOAs with high need for tree planting (tree equity score 70-79)



2.6 Air Quality

- 2.6.1 Air pollution is harmful to everyone. There is no safe amount of air pollution and long-term exposure to even low levels of air pollution can impact our health in the future, and this is of particular relevance to children.
- 2.6.2 The health impacts of air pollution are unequal, leading to unacceptable health inequalities, therefore improving air quality remains a priority for the council.
- 2.6.3 Urban trees can alleviate and mitigate air pollution by utilising the chemical components of the pollutant or by reducing the amount of particulate matter through interception from the leaves and branches, until it is washed away by rainfall.
- 2.6.4 The GLA annually measures nitrogen dioxide (NO₂) concentrations to identify areas higher than the European Limit Value. We have a new borough-wide Air Quality Management Area and have identified 21 Air Quality Focus Areas (AQFAs). An AQFA is a location that has been identified as having high levels of pollution as well as high levels of human exposure.

2.7 Carbon Storage and Sequestration

- 2.7.1 Trees can help mitigate climate change by storing and sequestering atmospheric carbon as part of the carbon cycle. Since about 50% of wood by dry weight is comprised of carbon, tree stems and roots can store carbon for decades or even centuries.¹⁸
- 2.7.2 Overall, Brent's street trees store an estimated 9,664 tonnes of carbon with a value of £2.45 million.¹⁹
- 2.7.3 Increasing the number of trees, particularly those with an ability to store more carbon, can therefore slow the accumulation of atmospheric carbon, which is a contributor to climate change.

18. Kuhns 2008; McPherson 2007

19. Brent i-Tree Eco Stratified Inventory Report, Treeconomics 2020

2.8 Stormwater Regulation

- 2.8.1 Urban trees and woodlands regulate stormwater by intercepting and storing rainfall on their leaves, which either subsequently evaporates, or reaches the groundwater reservoir more slowly through gradual release as through-fall.
- 2.8.2 Trees also improve infiltration into the soil by channelling water onto permeable surfaces around the trunk, and through the soil along root channels. Including engineered SuDS (Sustainable Drainage Systems) into planting schemes and flexible paving material around existing mature tree pits in new developments has the potential to increase the water holding capacity of root zones.
- 2.8.3 Delaying the release of stormwater into the drainage system alleviates the risk of localised flooding and reduces the pressure on the ageing tunnel network. SuDS also reduce the pressure on natural watercourses and river systems.
- 2.8.4 In urban areas, the large extent of impervious surfaces increases the amount of run-off. However, trees are very effective at reducing surface run-off through interception and infiltration. The urban canopy of Brent's street trees is estimated to intercept 8,223m³ of run-off per year with an associated value of £4,535.²⁰

Figure 3: SuDS planting in Brent



20. Brent i-Tree Eco Stratified Inventory Report, Treeconomics 2020

2.9 Biodiversity

- 2.9.1 Trees contribute significantly to biodiversity in urban areas and provide habitat for a range of wildlife. This includes dead standing timber and veteran trees, as well as logs left in-situ and brash stacked as habitat piles. Many species of trees that produce nectar and pollen are also of interest to bees and can contribute to the Bee Corridor Project. Particularly good trees for bees include Willow, Maple, Horse Chestnut, Acacia and Lime.
- 2.9.2 Street tree planting and urban trees can play a crucial role in improving wildlife links and connectivity between green spaces along streets.
- 2.9.3 The vision for active travel in Brent is to create an environment and culture in which walking, wheeling and cycling are safe, convenient, healthy and attractive options for everyone, as set out in the draft Brent Active Travel Implementation Plan (2024-2029).
- 2.9.4 Brent's School Streets schemes and Safer Streets and Places programmes, together with projects such as the Wembley to Willesden Junction Healthy Streets scheme, all include tree planting. There is also an aim to help tackle health inequalities within the borough by increasing levels of active travel by taking action to better connect parks and open spaces.
- 2.9.5 A combination of the Environment Act 2021, London Plan Policy G6 and Local Plan Policy BGI1 set out a mandatory 10% increase in biodiversity in most new major and minor developments. Biodiversity Net Gain (BNG) is an approach that creates a quantified enhancement to the natural environment following development to what previously existed.
- 2.9.6 The Defra BNG metric considers habitat condition, distinctiveness and strategic significance of habitats including urban trees to calculate its Biodiversity Unit Value. This is used to inform the appropriate level of compensation required through the planning process.
- 2.9.7 All developments are encouraged to plan for green infrastructure in a way that complements and co-exists with the existing elements. SINC and ecological corridors already provide high value biodiversity. However, to achieve the increase in biodiversity, London Plan Policy G6 and Local Plan Policy BGI1 set a baseline to protect and conserve priority species and habitats that are outside SINC and ecological corridors.

3. Approach to Tree Planting

3.1 Overview

- 3.1.1 Tree planting provides both a symbolic and important contribution to our work to address the climate emergency, helping to raise awareness of the issue and inspire others to take action, while providing a significant range of benefits in helping us adapt to a changing climate.
- 3.1.2 We want to continue our commitment to and investment in tree planting and, as part of this Tree Strategy, to deliver greater benefits for the environment and our communities. Street trees in particular, allow residents to develop a connection to nature close to where they live. Trees and woodland management will be a major consideration in the production of a Local Nature Recovery Strategy (LNRS).

3.2 Maintaining Tree Canopy Cover

- 3.2.1 To maintain tree canopy cover across the borough, the council will seek to retain all mature trees for as long as possible and aim to plant at least one new tree for every tree it removes, although not necessarily in the same place, over the long term.

Figure 4: Tree planting projects in Brent



3.3 Increasing Tree Canopy Cover

- 3.3.1 The council will, subject to resources, encourage new tree planting in areas of low tree canopy cover or low tree equity, through a new Brent Tree Planting Strategy.
- 3.3.2 Tree canopy cover can be increased in some cases, such as in parks simply by encouraging natural regeneration of wooded areas through changing the management regime rather than planting. The new Brent Tree Planting Strategy will focus on the LSOAs that have the lowest tree canopy cover and where tree planting is a high or the highest priority, according to the Tree Equity Score UK score - see **Section 2.5**.

3.4 Increasing Partnership Working

- 3.4.1 Our goals and objectives cannot be achieved by the council alone and require us to continue working with a range of partners to provide opportunities for collaboration that will seek to deliver a series of tree planting programmes.
- 3.4.2 We aim to increase opportunities for residents, 'Friends of' groups and local community groups to get involved in tree planting and management.
- 3.4.3 We want to explore how we can work with schools, businesses, residents and community organisations to complement the council's activities. There is already a diverse network of community and volunteer groups that the council interacts with, and there are members of the community who lead walks and talks about trees (Barham Park, Olympic Way, the Welsh Harp), and help with wildlife surveys.
- 3.4.4 Through a future tree planting programme, we want to enhance and increase opportunities to work together. We will offer workshops for residents, community groups and schools to learn about, and do practical things to support tree wildlife, such as building and installing bird and bat boxes, hedgehog boxes and bug hotels.

3.5 Funding

- 3.5.1 Trees and tree planting is an important part of the infrastructure of any area within the borough and it is therefore considered appropriate to deliver tree planting projects through NCIL funding. This could be used as match funding for other external funding sources secured by the council.
- 3.5.2 Funding for new tree planting will come from a range of other national, regional and local government sources as they become available, including grant opportunities and funding secured through s106 planning obligations and potentially BNG contributions.
- 3.5.3 CAVAT provides a method for understanding trees as public assets rather than liabilities. It is designed not only to be a strategic tool and aid to decision-making in relation to the tree stock as a whole, but also to be applicable to individual cases where the value of a single tree needs to be expressed in monetary terms.
- 3.5.4 Where trees are lost due to development or other reasons, the council will seek to obtain a CAVAT value in order to obtain appropriate compensation for additional tree planting within the borough.
- 3.5.5 When the council undertakes capital programme works, the procurement process allows for a percentage of the contract value to be used for projects that deliver social value. The Capital Programme team will include funding for tree planting projects as part of the social value elements of projects in the future.

3.6 Species Resilience

- 3.6.1 The council will select tree species for planting in the borough based on resilience criteria, using the principles of 'the right tree, the right place'. The species selection process will also be informed by local knowledge and a detailed site assessment.
- 3.6.2 We should be working towards no single species representing more than 5% of the total tree population, no genus more than 10% and no family more than 15%.

Climate Change

- 3.6.3 'Planting for the Future: Kew's Landscape Succession Plan' is a step towards understanding the effects of projected climate on our living landscapes. It aligns the climate of London in 2050 with that of Barcelona today. It predicts that by 2090 45% of Kew's tree species will be at the edge of their known range, with a further 9% outside of their known range, making them increasingly vulnerable. Species such as Oak, Beech, Silver Birch and Holly will be at risk, so by selecting European species of Oak and Beech, which thrive in higher temperatures, we can provide a more robust urban forest.
- 3.6.4 The council will work with relevant organisations to identify knowledge gaps and best practice in managing trees subject to increased stress caused by climate change. We will take guidance from London Tree Officers Association (LTOA), the GLA, the National Environmental Research Council, Kew Gardens, the Trees and Design Action Group and other academic and industry leaders in adapting our approach to tree selection.
- 3.6.5 By creating resilience within the tree population we can effectively manage the risks posed by climate change to ensure that the urban forest that we are planting today is suitable for the urban environment we anticipate for the future. We also want to ensure the urban forest will be resilient to risks associated with the impact of pests and diseases.

Pollen Allergy

3.6.6 There are a number of other potential issues we also need to be aware of, such as the allergy potential of trees. This is linked to the amount of pollen that a tree produces, the flower type, and the sex of the tree. There are three main types of flower found in trees:

- 1) Perfect flowered trees which produce flowers with both male and female parts. These are pollinated by insects and tend to be those least likely to cause allergy, and include apple, pear and magnolia.
- 2) Monoecious trees which include pine, cypress, birch and walnut and which have separate male and female flowers on the same tree. Not all monoecious trees cause allergies, however they are wind pollinated.
- 3) Dioecious trees are trees where each individual tree is either male or female and these rely on pollen moving through the air from male to female trees. These include red maple, ash, holly, poplar, mulberry and willow.

3.6.7 Allergic reactions are related to the size and volume of pollen produced and the ease with which it is dispersed into the atmosphere. It is not suggested that trees which produce high levels of pollen should not be planted, but that careful consideration must be given to what types of tree are to be planted in areas likely to disproportionately impact vulnerable groups, such as young children or the elderly; high pollinating male dioecious trees or monoecious trees should therefore be avoided.

4. Council Tree Management

4.1 Trees on Highways

- 4.1.1 The council will continue its programme of cyclical street tree inspections to ensure the health and safety of trees is maintained, and the potential for tree-related damage and nuisance is kept to a reasonable minimum.

4.2 Trees in Parks, Open Spaces, Cemeteries and Allotments

- 4.2.1 There are over 100 parks and open spaces in Brent, providing over 400 hectares of public open space across the borough.
- 4.2.2 The council also owns and manages three cemeteries within the borough: Alperton Cemetery, Paddington Old Cemetery and Willesden New Cemetery. It also manages and maintains four closed churchyards: St Mary's in Willesden, St John's and St Joseph's in Wembley and St Andrew's in Kingsbury.
- 4.2.3 Outside the borough, the council jointly owns Carpenders Park Cemetery, located within the area of Three Rivers District Council near Watford. Harrow Council owns approximately 25% of the burial land at Carpenders Park, with Brent Council managing the whole cemetery as part of a joint delivery arrangement. This includes all trees within the cemetery.
- 4.2.4 Trees located along main paths through parks and cemeteries (excluding allotments) have a higher inspection frequency than the surrounding area.
- 4.2.5 There are 21 allotment sites throughout the borough which are owned and managed by the council.

Minor Tree Works

- 4.2.6 The council's grounds maintenance contractor can carry out minor tree works and tasks that can be undertaken from the ground without the use of ladders. This includes tree inspections and removal of problematic low branches, planting new trees and some upkeep until established, removal of fallen material, and reporting issues to Brent Parks Services.
- 4.2.7 Tree pruning and other arboriculture operations are carried out in accordance with professional standards, specifically BS 3998:2010, and in accordance with the council's requirements. When felling a park tree, Brent Parks Services will always remove the tree stump to allow for opportunity for future planting.

Pruning of Overhanging Trees

- 4.2.8 Where a private property borders a park, cemetery or allotment, residents can prune branches overhanging their property and leave the debris on council land, with prior permission. The council will arrange for the debris to be cleared. Branch removal should be undertaken in such a way that it does not harm the health of the tree and if in any doubt, residents should employ a qualified arboriculturalist.

4.3 Trees on Brent Housing Management Estates

- 4.3.1 Estates managed by Brent Housing Management (BHM) vary widely in size, building type, and provision of amenity space for residents. We are committed to effectively managing existing trees on these estates and planting new trees through a cyclical maintenance programme.

4.4

Reducing the Potential for Tree Related Building Damage

- 4.4.1 The council cannot remove the risk of subsidence claims, but we remain aware of them and will manage trees accordingly to minimise the likelihood of any claims as far as is reasonably possible.
- 4.4.2 The council's Insurance team currently manage all claims relating to the council's trees. Where a tree is implicated as having potentially caused subsidence damage to a property, the burden of proof is on the claimant to provide evidence that the tree is the cause.
- 4.4.3 Where a claim has been notified to the council, the council may undertake appropriate tree management, on a strictly without prejudice basis in respect to legal liability. Such tree management measures may include cyclical pruning and/or pollarding or, alternatively, removal of the implicated tree or trees. The council will not remove individual trees based on resident speculation of future risk.
- 4.4.4 The council will continue with the following established management regimes:
- Cyclical pruning or selective removal and replacement of council tree stock in areas predisposed to building movement where this is appropriate.
 - Challenging unwarranted claims based on poorly investigated or inaccurate evidence.
- 4.4.5 If homeowners are concerned about council owned trees causing subsidence to their properties, they are advised in the first instance to contact their insurance providers who will be able to provide guidance on how to commission and obtain a written report. On receipt of the report the council will consider the risk, and if deemed necessary, preventative works will be undertaken.

5. Privately Owned Trees

5.1 Trees on Private Land

- 5.1.1 Private trees make a significant contribution to the visual amenity of Brent and provide an important habitat for wildlife. The council encourages owners of private trees to manage their trees correctly and in accordance with good arboricultural practice.

5.2 Care and Maintenance of Private Trees

- 5.2.1 Tree owners have a duty of care towards others' property and should regularly inspect trees in their ownership or care, maintaining them to a good and safe standard. It is advisable to seek advice before carrying out any works to a protected tree either subject to a Tree Preservation Order (TPO) or in a conservation area unless there is imminent danger to the public.
- 5.2.2 Subject to securing the relevant permissions, where appropriate, branches of trees rooted in a neighbouring property that overhang the boundary, may be cut back to the boundary to prevent or abate a nuisance. The term nuisance is used in the legal sense and the branches remain the property of the owner.
- 5.2.3 Where trees on private land are posing an imminent threat to public safety, the council may, as a last resort, serve notice on the owner requesting that work is carried out to make the tree safe. If this notice is not complied with, works can be undertaken by the council and costs recovered from the property owner (Local Government (Miscellaneous Provisions) Act 1976 s23 and s154 of The Highways Act 1980).

5.3 Protected Trees

- 5.3.1 The council will seek to protect and maintain private trees of amenity value using a Tree Preservation Order (TPO) and conservation area legislation in accordance with the Town and Country Planning Act 1990.
- 5.3.2 The statutory definition of a conservation area is “an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance”. Conservation areas and their boundaries can be viewed on the council’s website.
- 5.3.3 Existing trees that contribute to the verdant character of a conservation area and which provide a setting for Brent’s architectural heritage will be preserved. Any person wishing to remove or undertake works to a tree within a conservation area, with a trunk diameter of 75mm or more measured at 1.5m above ground level, is required to give six weeks’ notice to the council in accordance with s211 of the Town and Country Planning Act 1990. The council will register, assess and reply to all correspondence within six weeks.
- 5.3.4 Any person wishing to remove or prune a tree under a TPO is required to make a formal application to the local planning authority, in accordance with s198 of the Act. Once the application has been registered it will be assessed and a decision notice issued within eight weeks detailing the outcome. The council may seek to prosecute any person who carries out or allows another to carry out on their behalf unauthorised works to a tree protected by a TPO or within a conservation area.

5.4 Trees Owned by Public Authorities

- 5.4.1 Where issues arise in respect of trees on land owned by other public authorities, such as trees along canals and railways that are the responsibility of the Canal & River Trust and either Transport for London or Network Rail respectively, the council is limited in its powers to intervene.

6. Planning & Development

6.1 Overview

- 6.1.1 The council makes planning decisions on the basis of the policies as set out in the Brent Local Plan (2019-2041), which interprets national and regional planning policy into its local context. The policies relating to trees are set out in **Appendix 1**.
- 6.1.2 In addition to planting new trees, it is important we protect and maintain the existing trees and woodland we have. This involves using our planning powers to minimise the impact of development on trees and woodlands.
- 6.1.3 The council is empowered under s198 of the Town and Country Planning Act 1990 to make Tree Preservation Orders (TPOs) as appropriate to protect trees which are important to public amenity.
- 6.1.4 Policy BGI2 of the Brent Local Plan states where trees are located on or adjacent to a site, the council will require the submission of a tree survey in accordance with BS 5837: 2012 or equivalent. The council's Principal Tree Officer will be consulted on any development which is likely to impact on trees.
- 6.1.5 Trees should be retained wherever possible, and any proposed removal will need to be justified in an accompanying Arboricultural Impact Assessment (AIA). In the case of major development, if it is agreed not to be possible to retain trees on site, developers should provide details of new trees to achieve equivalent tree canopy cover, or a financial contribution for off-site planting.
- 6.1.6 The local planning authority will consult with either the Highways or Parks teams where trees on public land are potentially affected by a development proposal. Any agreed tree removal associated with development will need to be adequately compensated using the CAVAT methodology to determine the value of the tree to be removed, which will then be sought from the developer.
- 6.1.7 CAVAT is regarded as one of the principal methods of tree valuation in the UK and provides a method for managing trees as public assets rather than liabilities. The council's policy is to not allow anyone to pay for the removal and replacement of a tree, except when the agreed CAVAT value is sought as part of the development process.
- 6.1.8 Any unauthorised tree removal or reckless damage leading to tree loss may be referred for legal action and, in such case, the CAVAT value of the tree will be sought in compensation.

6.2 Action Plan

- 6.2.1 To ensure this Tree Strategy goes beyond setting out the context and existing approaches to trees and tree management in Brent, the council has developed an action plan. The action plan defines a series of aims, supported by specific and measurable actions the council aspires to deliver on that can be monitored and evaluated over time.

Table 4: Summary of tree-related aims and actions

Aims	Actions
1) Support the council's climate change initiatives and support delivery of the Climate and Ecological Emergency Strategy 2021-2030.	<ul style="list-style-type: none"> • Achieve a net increase in tree canopy cover in streets and green spaces, where possible, in the context of revenue budget constraints relating to ongoing maintenance. • Achieve a net increase in trees planted within major development schemes. • Work with partners to support the Nature Recovery Strategy by improving green infrastructure connectivity where possible, particularly utilising planting on streets and street verges. • Plant and promote the planting of a mix of climate resilient tree species, including, where appropriate, large canopy species which provide the greatest ecosystem services.
2) Increase street tree canopy cover to improve ecosystem services (air quality, shading, flood risk, public health benefits)	<ul style="list-style-type: none"> • Support Tree Equity Model by seeking to increase tree planting in those areas of the borough with lowest tree equity scores, where possible. • Ensure that appropriate tree planting is secured as part of the process of granting planning permission. • Promote our existing tree planting sponsorship scheme more widely.

Aims	Actions
3) Preserve existing mature trees through good tree management and the use of policies that support good tree management	<ul style="list-style-type: none"> • Promote best practice when managing our tree stock, in terms of promoting diversity of species, canopy size and range of maturity. • Share best practice associated with the management of tree risks, such as subsidence, with other London Boroughs. • Make Tree Preservation Orders (TPOs) proactively to ensure protection of important trees at risk. • Adopt CAVAT (Capital Asset Value for Amenity Trees) where trees are lost to ensure adequate re-provision of tree canopy cover.
4) Promote biodiversity	<ul style="list-style-type: none"> • Promote Biodiversity Net Gain (BNG) and use of the Defra metric to inform an appropriate level of tree planting as compensation required through the planning process in relation to trees. • Explore opportunities for establishing (a) habitat bank(s) in the borough. • Promote the retention of dead wood, veteran trees and habitat piles in the management of our trees. • Support the planting of trees that produce nectar and pollen and are of interest to bees.
5) Support and enhance opportunities for community engagement	<ul style="list-style-type: none"> • Provide information on our website in relating to tree management, maintenance, and tree planting. • Work with schools to promote hedge, tree and orchard planting projects. • Support 'Friends of' groups to engage in tree planting and to promote tree related projects, walks and talks. • Encourage residents to water new street trees.

7. Appendices

7.1

Appendix 1: National, Regional and Local Tree-Related Planning Policy

National Planning Policy

- 7.1.1 The Environment Act 2021 places a mandatory requirement for some types of development to deliver 10% Biodiversity Net Gain (BNG) to restore and protect our environment to deliver on the Government's commitment 'to leave the environment in a better state than we found it'.
- 7.1.2 The National Planning Policy Framework December 2023 set out the government's planning policies for England and how these are expected to be applied.
- 7.1.3 It acknowledges that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change.
- 7.1.4 The England Trees Action Plan 2021-24 (UK Government) interprets the vision specifically relating to trees and woodlands and the role they have in working towards nature recovery and delivering on climate change mitigation.
- 7.1.5 It proposes new guidance through the National Model Design Code on how trees can be included in the built environment, including design parameters for the placement of street trees and incorporating trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible.

The London Plan (March 2021)

- 7.1.6 Policy G7 Trees and woodlands: states that 'London's urban forest should be protected and maintained, and new trees and woodlands planted in appropriate locations in order to increase the area of London under the canopy of trees'. It goes on to state that development proposals should ensure that wherever possible existing trees of value should be retained; and that if trees are removed to accommodate development that adequate replacement is secured based on the existing value of the benefits of trees as determined by an appropriate valuation system. Planting of additional trees should generally be included in new developments, particularly large-canopied species.
- 7.1.7 The Mayor of London wants to increase tree canopy cover in London by 10% by 2050 and identifies the planting of more street trees as a low-cost contribution towards healthy streets and active travel.

Brent Local Plan 2019-2041

- 7.1.8 The Local Plan takes forward the National Planning Policy Framework and interprets what this means for Brent. There is a presumption in favour of sustainable development with three overarching objectives (economic, social and environment). The following policies relate to trees:
- 7.1.9 Policy DMP1 requires acceptable development to retain high amenity trees.
- 7.1.10 Place and area policies include retention of existing trees where possible (and identify key tree features to be retained) and expect new tree planting to be included as part of the anticipated infrastructure, together with open space provision.
- 7.1.11 Policy BH4 Small Sites and Small Housing Developments in Brent seeks to ensure that the Urban Greening target of 0.4 is delivered in housing developments of less than 10 dwellings. Trees play an important role in contributing to this target.
- 7.1.12 Policy BGI1 Green and Blue Infrastructure in Brent identifies areas of open space deficiency and identifies how development will be expected to provide open space, provides for biodiversity net gain and that development will meet the urban greening factor and support biodiversity.
- 7.1.13 Policy BGI2 Trees and Woodlands sets out expectations as to what information relating to trees will be expected to be submitted in support of planning applications; provision for the retention of trees, and for planting of new trees to achieve equivalent tree canopy cover as appropriate.

Borough Plan 2023-27

- 7.1.14 One of the Borough Plan priority areas is 'A Cleaner, Greener Future'. The council will ensure sustainability is central to the growth of our borough and local economy; and invest to make our streets cleaner and healthier.

7.2 Appendix 2: Air Quality Focus Areas

Map 3: All 21 designated air quality focus areas (AQFAs) in Brent overlaid with the Indices of Multiple Deprivation (IMD) deciles

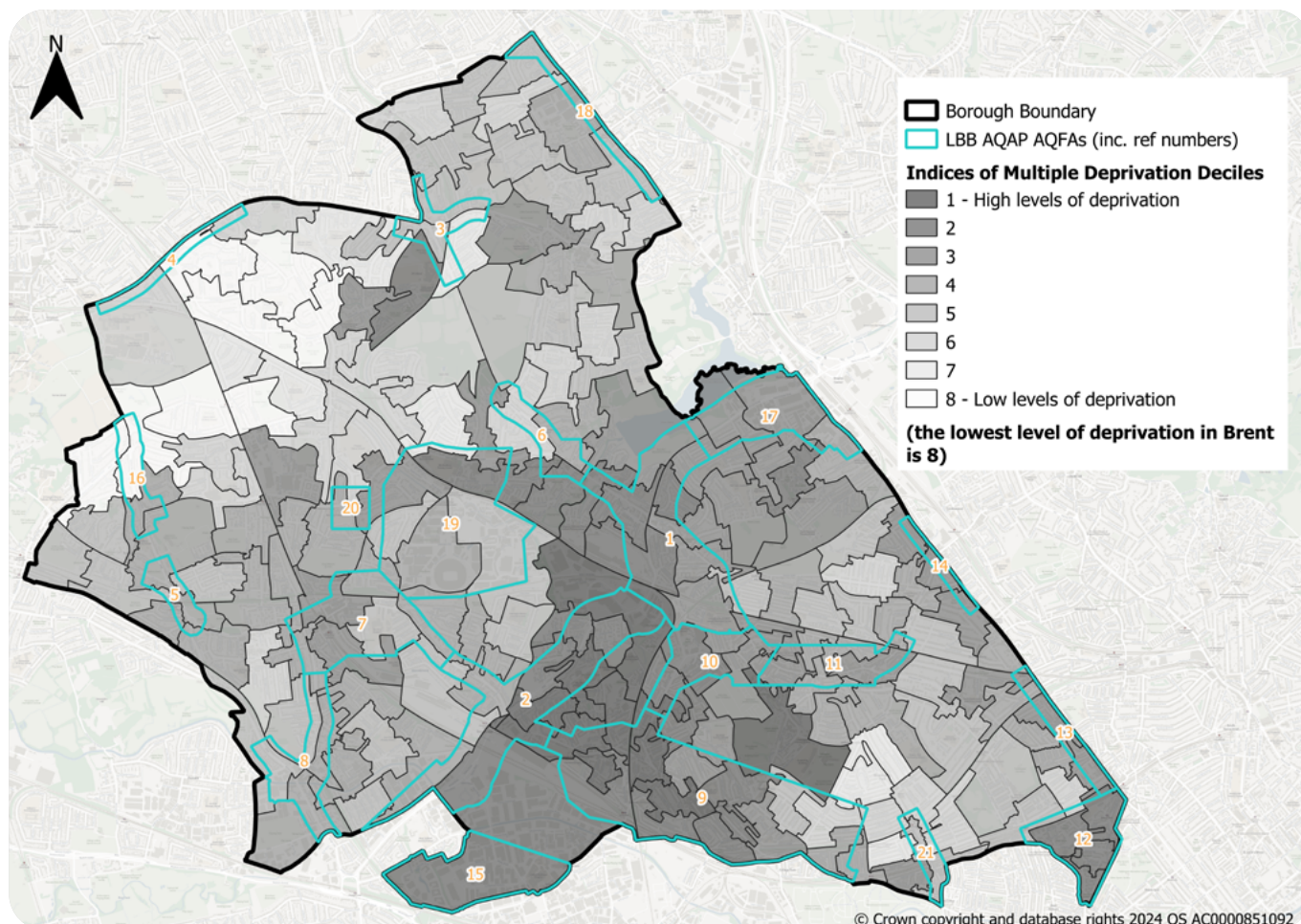


Table 5: Air quality focus areas in Brent

ID	Name	Coverage
1	A406/Neasden/Neasden Stations	A406 corridor and Neasden Lane junction, covers all of Neasden Stations Growth Area and Neasden Town Centre
2	A406/Harrow Road	A406 corridor, covers part of Alpertown Growth Area
3	Kingsbury	Covers all of Kingsbury Town Centre
4	Kenton Road/Northwick Park	Covers all of Northwick Park Growth Area and most of Kenton Town Centre

ID	Name	Coverage
5	Sudbury Town Centre	Covers all of Sudbury Town Centre
6	Blackbird Hill/Salmon Street	
7	Wembley Town	Covers southern part of Wembley Growth Area and southern part of Wembley Town Centre
8	Alperton/Ealing Road	Covers part of Alperton Growth Area and all of Ealing Road Town Centre
9	Harlesden	Covers Harlesden Town Centre
10	Church End	Covers all of Church End Growth Area and Church End Town Centre
11	Willesden Green	Covers all of Willesden Green Town Centre
12	South Kilburn	Covers all of South Kilburn Growth Area and southernmost parts of Kilburn and Queens Parks Town Centres
13	Kilburn	Covers most of Kilburn Town Centre
14	Cricklewood	Covers all of Cricklewood Town Centre
15	Park Royal	
16	Watford Road	
17	A406/Staples Corner	Covers all of Staples Corner Growth Area
18	Burnt Oak/Colindale/The Hyde	Covers large part of Burnt Oak/Colindale Growth Area and all of Colindale/The Hyde and Burnt Oak Town Centres
19	Wembley Park/Ark Academy	Covers most of northern section of Wembley Growth Area and northern part of Wembley and all of Wembley Park Town Centres
20	Wembley Hill Road/West Lane/Preston Road	
21	Kensal Rise	Covers most of Kensal Rise Town Centre

7.3

Appendix 3: Tree Canopy Cover in Brent by Ward

Map 4: Map of tree canopy cover in Brent by ward

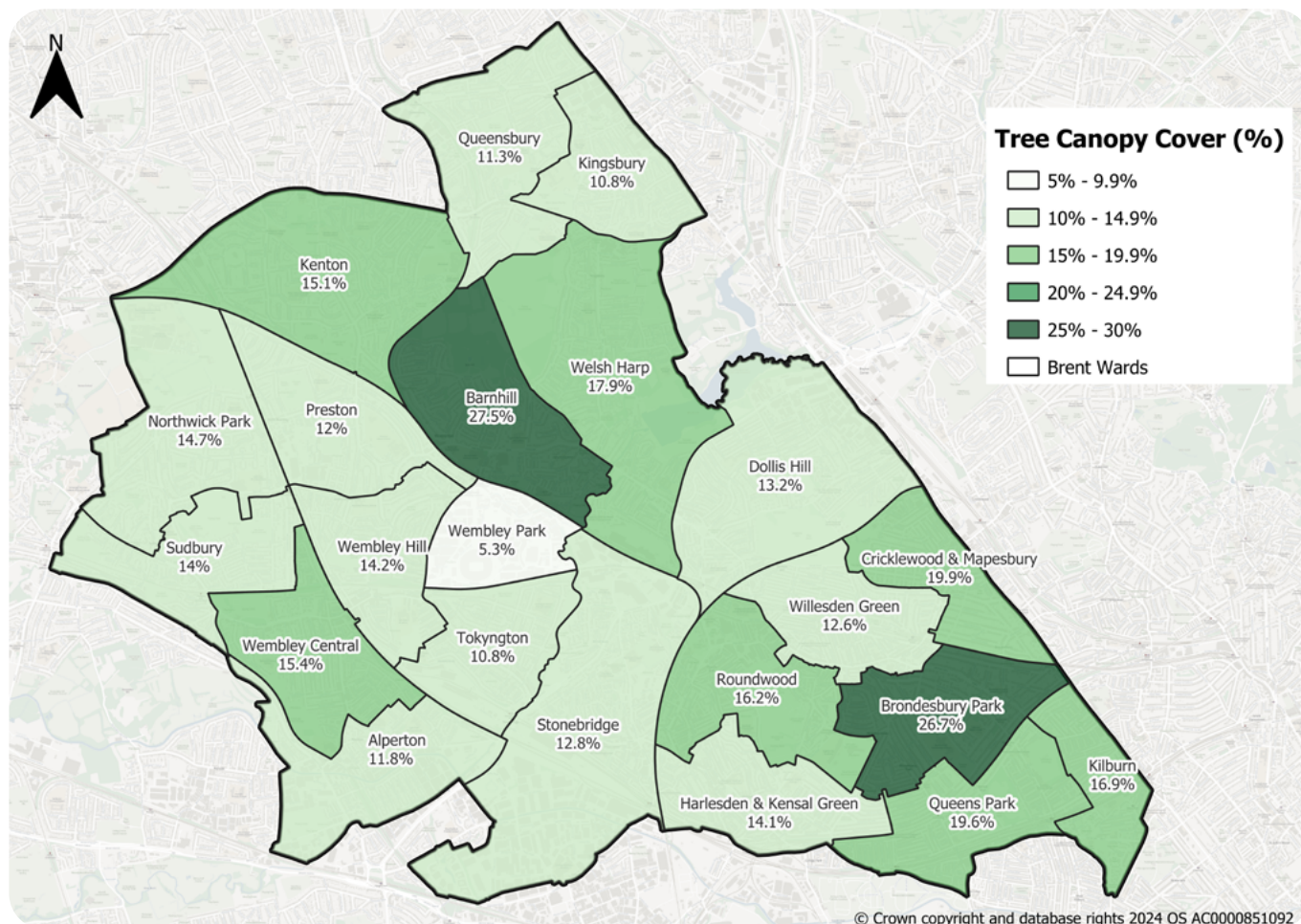


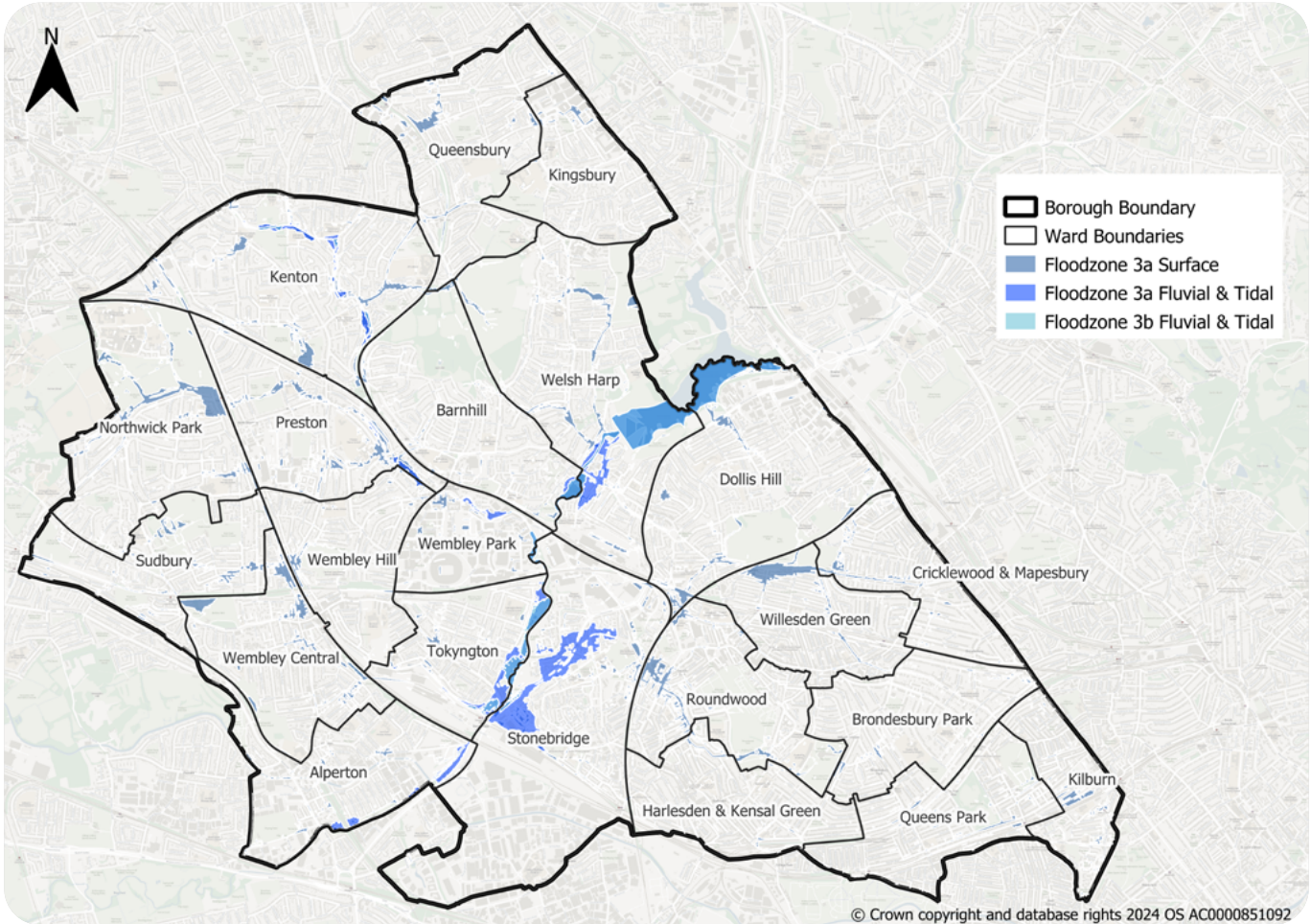
Table 6: Tree canopy cover in Brent by ward

Ward	Tree Canopy Cover
Barnhill	27.5%
Brondesbury Park	26.7%
Cricklewood and Mapesbury	19.9%
Queens Park	19.6%
Welsh Harp	17.9%
Kilburn	16.9%
Roundwood	16.2%

Ward	Tree Canopy Cover
Wembley Central	15.4%
Kenton	15.1%
Northwick Park	14.7%
Wembley Hill	14.2%
Harlesden and Kensal Green	14.1%
Sudbury	14%
Dollis Hill	13.2%
Stonebridge	12.8%
Willesden Green	12.6%
Preston	12%
Alperton	11.8%
Queensbury	11.3%
Kingsbury	10.8%
Tokington	10.8%
Wembley Park	5.3%
Average	15.1%

7.4 Appendix 4: Flood Risk Zones

Map 5: Map of flood risk zones in Brent



7.5 Appendix 5: Bibliography

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Planning & Development Services
Brent Civic Centre
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Wembley HA9 0FJ

 Brent	Cabinet 19 May 2025
	Report from the Corporate Director, Housing & Resident Services
	Lead Member – Cabinet Member for Housing & Resident Services (Councillor Fleur Donnelly- Jackson)
Council sale of converted dwelling House at 1A – 1D Greenhill Park to First Wave Housing Ltd	

Wards Affected:	Harlesden & Kensal Green
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	None
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Spencer Randolph, Director Housing Services 020 8937 2546 Spencer.Randolph@brent.gov.uk

1.0 Purpose of the Report

- 1.1 This report is to advise Cabinet on the proposed sale by the Council of a converted dwelling house at 1a-1d Greenhill Park, Harlesden, NW10 9AE (the “Property”) to First Wave Housing. The property is part of the Council’s Housing Revenue Account housing stock and is now vacated. The property has some structural damage and requires structural remediation prior to re-occupation.

2.0 Recommendations

Cabinet is asked to:

- 2.1 Approve the sale by the Council of a converted dwelling house at 1a-1d Greenhill Park, Harlesden, NW10 9AE to First Wave Housing.
- 2.2 Note that the purchase has been approved by First Wave Housing Board who are willing to proceed at the valuation price of £1.45M. First Wave Housing will cover the costs of refurbishment following acquisition.

- 2.3 To note that Brent Legal will deal with the sale and the purchase of the Property and there will be separate lawyers acting for the Council and for First Wave Housing (subject to the Board of First Wave Housing approving this arrangement). Brent Legal will also deal with the funding and loan documents regarding the loan of £1.45M by the council to First Wave Housing.

3.0 Cabinet Member Foreword

- 3.1 This contract contributes to the Borough Plan and other strategic policies as follows:

- A Cleaner, Greener Future – the technical design will include specifications that are sustainably sourced. Refurbishment works will consider how to achieve high levels of energy efficiency at the Property that will lead to reduced fuel usage and lower bills for residents.
- Thriving Communities – the Property will provide increased accommodation capacity.
- A Healthier Brent – the homes at the Property will provide clean and health living conditions.
- Climate & Ecological Emergency Strategy – the refurbishment works will contribute to the Council achieving its climate emergency targets.

- 3.2 First Wave Housing requires additional accommodation. The Council and First Wave Housing officers have undertaken an assessment of the Property and identify it as being suitable for sale to First Wave Housing.

4.0 Background

- 4.1 The Property is a converted dwelling house split into 4 flats. It is currently part of the Council's Housing Revenue Account Housing stock. The Property is currently vacant.
- 4.2 The Property has some structural damage and requires structural remediation and internal and external refurbishment prior to re-occupation. This has been factored into the purchase price.
- 4.3 The structural survey of the Property has identified internal crack damage to the walls and ceilings in all the flats. The movement of this Property appears to relate predominantly to the rear of the Property – the rear section of this Property rotating towards the rear and laterally to the right-hand side. The pattern of the crack damage (rotational movement of the rear section of the house and lateral rotational movement of the right-hand side of the house) – is indicative of subsidence.
- 4.4 The presence of shrinkable clay beneath the foundations (London Clay) and the proximity of broad leaf vegetation where there has been damage, indicates

the clay shrinkage to be root induced. Several mature deciduous trees were removed in the recent past – during the inspection it was noted that there were stumps to the front right-hand side of the Property, and there were also tree stumps adjacent the rear elevation of the Property. However, there were also new Sycamore tree groups (saplings that are self-sown) that have self-propagated in the recent past, that may collectively with the remaining large deciduous trees be continuing to cause ground movement (subsidence of the site) and possible ongoing movement of this Property.

- 4.5 Whilst the crack damage observed at the time of the inspection was found to be historic, evidence of previous crack monitoring (Demec studs) and clearly the result of a great many years of cyclical ground movement influenced by the nearby vegetation, leads to a possibility that there may be ongoing active movement.

5.0 Remediation of the Structural Damage

The remediation involved:

- 5.1 The removal of all climbing vegetation to the external elevations of the Property, all of the Sycamore tree groups, and the remaining trees adjacent to the rear of the Property – there were 4nr Sycamore tree groups, 1nr Ash tree group, a Bay Tree and a Conifer adjacent to the rear elevation.
- 5.2 It will be prudent to undertake the level monitoring of the Property to determine stability during the Autumn/Winter months following the site clearance and tree removal.
- 5.3 On confirmation that there is sustained stability of the Property, arrangements will be made for structural crack repairs to include partial brick masonry rebuilding works, brick stitch repairs. This will include structural stitch repairs with a proprietary bed joint reinforcement scheme (Helibar or similar) for the worst of the crack damage to the internal and external brick masonry.
- 5.4 Thereafter, the flats at the Property will receive pre-paint repairs and then redecoration, ready for re-occupation.

6.0 Consultation with Ward Members and Stakeholders

- 6.1 The Cabinet Member for Housing & Resident Services has been consulted in regard to this report.
- 6.2 Ward members will be consulted in regard to this report.

7.0 Financial Implications

- 7.1 The Property has a market valuation of £1.5m in its present condition.
- 7.2 It is estimated that the following works and costs are required prior to occupation:

Scaffolding and masonry repairs		£	60,000
Internal plaster work and repairs		£	30,000
Partial window replacement		£	40,000
Dampness works		£	10,000
Redecoration		£	10,000
Internal doors		£	9,000
Garage, outbuilding, environmental		£	15,000
Electrical upgrade		£	2,000
Two kitchens		£	25,000
Two bathrooms		£	10,000
		£	211,000
Contingency	15%	£	31,650
		£	242,650
Contractor preliminaries, overheads and profit	25%	£	60,663
		£	303,313

However, due to the required structural remediation a purchase price of £1.45m has been agreed.

7.3 First Wave Housing will cover the cost of refurbishment following acquisition.

8.0 Legal Implications

8.1 Under S.123 (1) Local Government Act 1972 a local authority is entitled to dispose of land held by it in any manner it wishes. However, this general power is limited by the duty in S.123(2) Local Government Act 1972 to achieve the best consideration that can reasonably be obtained when disposing of land, unless consent has been obtained from the Secretary of State for Communities and Local Government.

8.2 Generally, the best price reasonably obtainable for the purposes of this duty is in many cases going to be the best price achievable in the open market, taking into account all potential bidders, including any bidders with a special interest.

8.3 As such, to reduce the risk of legal challenge, local authorities should, before agreeing the terms for the disposal of any interest in land for a price which may be less than the open market value, ensure that they obtain a robust valuation of that interest. This applies whether or not the local authority considers that it has achieved the best price reasonably obtainable. Such a valuation will provide evidence that the local authority acted reasonably and with due regard to its duty.

8.4 It is important to note that the duty does not prescribe a particular process which must be followed or particular factors which must be considered to achieve the best price reasonably obtainable.

9.0 Equity, Diversity and Inclusion (EDI) Considerations

9.1 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.

9.2 Under the Public Sector Equality Duty, having due regard involves the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.

9.3 The Public Sector Equality Duty covers the following nine protected characteristics: age, disability, marriage and civil partnership, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

9.4 The proposals in this report have been subject to screening and Officers believe that there are no adverse equality implications.

10.0 Human Resources/Property Implications (if appropriate)

10.1 There are no implications.

11.0 Climate Change & Environmental Considerations

12.0 Communication Considerations

Related document(s) for reference:
Survey & Valuation report

Report sign off:

Thomas Cattermole
Corporate Director Residents and
Housing Services

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