



Resources and Public Realm Scrutiny Committee

Tuesday 5 November 2024 at 6.00 pm

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

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

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

Membership:

Members

Councillors:

Conneely (Chair)
Kennelly (Vice-Chair)
Ahmadi Moghaddam
S Butt
Dixon
Georgiou
Long
Maurice
Mitchell
Molloy
Shah

Substitute Members

Councillors:

Aden, Afzal, Ethapemi, Fraser, Mahmood, Rajan-Seelan, Ketan Sheth and T.Smith

Councillors:

Kansagra and J.Patel
Lorber and Martin

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Notes for Members - Declarations of Interest:

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

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

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

***Disclosable Pecuniary Interests:**

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

****Personal Interests:**

The business relates to or affects:

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

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

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

or

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

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

Agenda

Introductions, if appropriate.

Item	Page
1 Apologies for absence and clarification of alternate members	
2 Declarations of interests	
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	
To approve the minutes of the previous meeting as a correct record:	
(a) Wednesday 04 September 2024	1 - 20
(b) Wednesday 02 October 2024 (Call-in - Barham Park Trust Property matters)	21-36
(Agenda published to include these minutes on the 04 November 2024).	
4 Matters arising (if any)	
To consider any matters arising from the minutes of the previous meeting.	
5 Deputations (if any)	
To hear any deputations requested by members of the public in accordance with Standing Order 67.	
6 Findings of the Local Government Ombudsman regarding a failure to attach a condition to a 2012 planning consent	37 - 58
This report details the outcome of a Local Government Ombudsman complaint relating to a planning application granted in May 2012 for the change of use of a site in Kingsbury Road to tyre fitting, storage and car wash, which the Ombudsman has recommended are reported to the relevant scrutiny committee (in this case Resources & Public Realm) for review.	
7 Strategic Community Infrastructure Levy and Section 106 Overview	59 - 88

The purpose of this report is to provide an update on the collection, allocation, and spend of Strategic Community Infrastructure Levy (SCIL) and Section 106 Agreement contributions made pursuant to the Town and Country Planning Act 1990 (S106) over the last 10 years, including information on any unallocated funds and spending priorities.

Members are asked to note that the report does not consider the collection, allocation and spend of the Neighbourhood Community Infrastructure Levy, which is overseen by the Community Grants team in the Partnerships, Housing and Residents Services directorate.

8 Quarter 2 Financial Forecast 2024-25 89 - 152

This report sets out the financial forecast for the General Fund revenue budget, the Housing Revenue Account, the Dedicated Schools Grant and the Capital Programme, as at Quarter 2 2024-25 for review by the Resources & Public Realm Scrutiny Committee.

9 Scrutiny Progress Update - Recommendations Tracker 153 - 178

This report presents the scrutiny recommendations tracker for review by the Resources and Public Realm Scrutiny Committee.

(Please note the agenda was republished to include this item on 1 November 2024)

10 Resources & Public Realm Scrutiny Committee Work Programme Report 2024-25 179 - 186

To provide an update on the Resources and Public Realm Scrutiny Committee's work programme 2024-25.

11 Any other urgent business

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

Date of the next meeting: Tuesday 28 January 2025



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MINUTES OF THE RESOURCES AND PUBLIC REALM SCRUTINY COMMITTEE **Held in the Conference Hall, Brent Civic Centre on Wednesday 4 September** **2024 at 6.00 pm**

PRESENT: Councillor Conneely (Chair), Councillor Kennelly (Vice-Chair) and Councillors Ahmadi Moghaddam, S.Butt, Dixon, Long, Lorber, Maurice, Mitchell and Molloy.

Also Present: Councillor Muhammed Butt (Leader of the Council & Cabinet Member for Housing) representing Councillors Krupa Sheth (Cabinet Member for Environment & Enforcement) and Councillor Tatler (Cabinet Member for Regeneration, Planning & Growth).

Paul Norton and Paul Harris (Continental Landscapes) – for Item 8

1. Apologies for Absence and Clarification of Alternate Members

Councillor Conneely (as Chair) welcomed members of the Scrutiny Committee to the meeting.

Apologies for absence were received from Councillor Georgiou (with Councillor Lorber attending as a substitute) and from Councillor Shah.

The Chair also confirmed that Councillor Muhammed Butt was attending (as Leader of the Council & Cabinet Member for Housing) to represent Councillors Krupa Sheth (Cabinet Member for Environment & Enforcement) and Councillor Tatler (Cabinet Member for Regeneration, Planning & Growth).

2. Declarations of Interests

Councillor S.Butt declared a personal interest in respect of Agenda Item 9: Delivery of Affordable Housing by i4B Holdings Ltd and First Wave Housing Ltd as one of the Council appointed Directors on the Board of both companies. Given the nature of the review due to be undertaken he advised that he would withdraw from the meeting for the consideration of that item.

No other declarations of interests were made at the meeting.

3. Minutes of the Previous Meeting

It was **RESOLVED** that the minutes of the previous meetings held on Wednesday 17 July 2024 be approved as a correct record.

4. Matters Arising (If Any)

No matters arising were raised at the meeting.

5. Deputations (If Any)

The Chair advised that she had agreed to accept requests for two deputations at the meeting, both in relation to Agenda Item 8: Review of Year 1 Grounds Maintenance Contract. The first of these was from Dollis Hill Copse Group and Friends of Gladstone Park and the second from Brents Parks Forum & Friends of Park Groups.

6. **Resources & Public Realm Scrutiny Committee work programme 2024-25 Municipal Year**

The Committee received a report from the Deputy Director Democratic Services, which presented the 2024-25 work programme for the Resources & Public Realm Scrutiny Committee.

In considering the report, members were advised that the work programme had been developed to reflect relevant strategic priorities within the Borough Plan, feedback received from residents, and issues raised by members of the Committee and other councillors. Development of the work programme had also involved engagement with key stakeholders in Borough as well as the Audit and Standards Advisory Committee to ensure alignment with their work programme.

Members noted that the work programme had also been developed as a flexible living document that could be adapted as required to include emerging issues.

Having reviewed the proposed work programmed it was **RESOLVED** to agree the Resources & Public Realm Scrutiny Committee work programme for the 2024-25 Municipal Year.

7. **Establishment of Budget Scrutiny Task Group**

The Committee received a report from the Deputy Director Democratic Services seeking approval to establish a Task Group to consider the Council's budget proposals for 2025-26.

In considering the report, the Committee noted the proposed remit and role of the Task Group in seeking to review the budget proposals and priorities identified as part of the Council's budget consultation and setting process for 2025-26, with final recommendations arising from the review to be presented to Cabinet in February 2025 alongside the final budget proposals.

As a result, it was **RESOLVED**:

- (1) That a Budget Scrutiny Task Group be established with members to be confirmed at the Committee meeting on 5 November 2024.
- (2) To note the Terms of Reference for the Task Group as detailed within section 2.2 of the report.

8. **Review of Year 1 Grounds Maintenance Contract**

Councillor Muhammed Butt (as Leader of the Council attending on behalf of Councillor Krupa Sheth - Cabinet Member for Environment & Enforcement) was invited to introduce a report providing a review of the first year of the Grounds Maintenance Contract with Continental Landscapes. In presenting the report, members were advised that the information provided included details on overall performance of the contract across parks, Brent Housing Management land as well as highways. The report also provided information relating to the challenges faced in the first year of the contract as well as lessons learned to allow improvements to be delivered moving forward with the contract, overall, felt to be making positive progress.

Following on from the Leaders introduction, Chris Whyte (Director of Public Realm) then continued by outlining the three primary challenges experienced during the first year of operation for the new contract, as identified in the report, including the need to embed and develop local working relationships with the new contractor after the previous arrangements, dealing with adverse weather conditions that had disrupted performance and grass-cutting, and integrating new machinery and electrical equipment. The Committee heard that the Council had been able to maintain an open and honest relationship with the new contractor in seeking to address these initial challenges, who had also acknowledged and reflected on the issues identified. Whilst it was acknowledged challenges remained around grounds maintenance performance on housing estates, larger parks were generally felt to have been maintained to a high standard, however issues with litter and fly-tipping during the summer season were also noted. Looking ahead, there would be ongoing evaluation of current practices to drive further improvements for the coming year. As part of the contract performance arrangements, Continental Landscapes would be conducting a comprehensive review of the summer season with insights and lessons learned to be shared with the Cabinet Member which members were advised could also be shared with the Scrutiny Committee.

Following on from presentation of the report, the Chair then invited David McClement (representing Dollis Hill Copse and Friends of Gladstone Park) to present his deputation outlining his experience of the new Grounds Maintenance Contract. Having thanked the Chair for the opportunity to speak, Mr McClement advised of the work undertaken by the Groups he was involved in supporting in seeking to maintain a small wooded copse area within Gladstone Park. Whilst thanking Continental Landscapes for their ongoing support, the opportunity was taken to highlight challenges which had been experienced following introduction of the new contract. These included the arrangements and delay in provision of a significant amount of woodchip to finalise works to footpaths and a lack of effective communication and flexibility between different teams and management in collaborating with one another. Clarifying questions were raised about practical measures that could enhance communication between different teams with David McClement's view that communication could be improved through knowledge of locality and improving clarity in communication between different teams and management. In recognising and valuing the important role played by Friends of the Park Groups and the volunteers who supported them, the Committee were keen to ensure that the issues highlighted in relation to communication and engagement between the contractor and volunteer groups such as Friends of the Park were addressed, including the need for a communications plan and ongoing support for the community support officer roles in the Grounds Maintenance contract, given their recognised source of valuable local knowledge. Questions were also raised

around delivery of the shared vision for the Dollis Hill Copse, which the Committee were reassured the Group along with their dedicated and experienced group of volunteers would continue to pursue.

The Chair thanked David McClement for his deputation and then invited Suzanne Morpurgo (as the co-ordinator of Brent Parks Forum) to address the Committee. In presenting her deputation on behalf of the Brent Parks Forum and Friends of the Park Groups Suzanne Morpurgo (participating online) began by informing members that Brent Parks Forum was a member of the National Federation of Parks, London Federation of Parks, and Brent Friends of the Earth. The organisation had also carried out educational work with children and engaged in various biodiversity work. Focussing on performance of the contract based on experience highlighted from feedback provided by different Friends of Parks Groups, the Committee was advised of concerns expressed about what was felt to be a reduction in contract specification overtime, compared to the specifications in the former Veolia contract including the loss of key staff. Further issues around tree care, training and staff retention, maintenance of pathways, loss of machinery and the need for new machinery (including reprovision of a haulage vehicle with chain to support brook clearance) were also highlighted. As a result of the issues raised, members advised they would be keen to seek clarification on how the specification of the new Grounds Maintenance Contract had changed when compared to the previous arrangements. As a further issue highlighted, the Committee were advised of specific concerns relating to the maintenance and planting programme for meadows and verges with the specific example provided of Fryent Country Park, meadows not being reseeded and concerns about the lack of a rotavator. In thanking Suzanne Morpurgo for her comments and contribution, the Chair noted a need for improved collaboration and communication between Brent Parks Forum and Continental Landscapes to effectively implement the more detailed horticultural recommendations.

Having thanked both deputations for their contribution and attendance at the meeting the Chair then moved on to invite questions and comments from the Committee in relation to the update provided on first year performance of the grounds maintenance contract, with the following comments and issues discussed:

- Following on from the query relating to specifications, Kelly Eaton (Head of Parks and Green Infrastructure) highlighted a number of key features regarding the differences between the current and previous contract specifications. Whilst the previous contract had been robust, gaps had been acknowledged particularly around the maintenance of pathways with steps taken to address this within the new contract. Given the broad scope of the contract, members were advised that Continental Landscape as the new contractors would be delivering a 5-year rolling programme to deal with the extensive range of tasks that needed to be completed. The new specification had also sought to tighten arrangements and charges for issues such as litter collections in parks which were now included as part of the contract fee. There had also been increases in the frequency of cutting on verges compared to only eight cuts a year in the past. Specifications had been established for the maintenance and cutting of verges. An enhancement of biodiversity had also been specified in the new contact. Additional costs had been reduced where necessary to ensure the Council was delivering an enhanced programme

including a focus on biodiversity and the provision of a fleet of electric vehicles substantially lowering the contract's carbon footprint.

In response to additional questioning, members were advised that whilst comparison specification details had not been requested as part of the original scope for the report commissioned these could be provided as part of any information request made by the Committee following the review. In noting the challenges identified in terms of the move to a new contractor from the previously long-established partner and operational framework, members were informed that the Grounds Maintenance Contract had been based on an output specification. This included a maximum height for verges although it was noted that the grass height had exceeded these limits due to unexpected adverse weather conditions, making this an atypical year of delivery. Although under normal conditions the electric machinery would operate well, Continental Landscapes had sought to acquire additional machinery that would perform better in challenging weather conditions.

- Referring to paragraph 3.6 within the report, which highlighted a new and clear process of monthly contract monitoring, members sought further details on how this operated in practice and how it differed from the framework that was in place under the previous contractor (Veolia). Kelly Eaton (Head of Parks and Green Infrastructure) responded that the previous contract had no formal contract monitoring between the park service and the grounds contractor. Now, there were monthly contract review meetings, weekly operational meetings and briefings for the Lead Member led by Continental Landscapes, all of which provided more robust monitoring arrangements. The system also included an enhanced IT package, although it was recognised the system required more intensive use in order to meet the Council's needs in extracting the necessary information to effectively monitor KPIs. Continental Landscapes were therefore working on a revision to their system with the first test of the new system expected in the coming months.
- Members also referenced paragraph 3.8 in the report around the challenges relating to the use of IT and accuracy of performance data as a means of supporting a meaningful and robust contract monitoring process. In response, Kelly Eaton (Head of Parks and Green Infrastructure) explained that a current problem with the system was that if an issue was marked as closed, such as through Fix My Street, but a resident later reported that it had not been resolved, there was no existing method within the system to escalate this issue or track duplicate reports. As a small team, it was crucial to identify where the problems were to determine wider issues that could then be reported to the contractor. The new system would enable the team to track escalations and duplicate reports from residents and was anticipated to be operational within the next few months. Paul Norton (Continental Landscapes) added, prior to the implementation of the new system, an interim solution would be put in place until the full development was finalised and would be able to provide a report based on a set of KPIs stipulated in the contract.
- Further details were sought on the challenges identified in relation to poor weather as an obstacle to delivery of the contract, given that extreme weather was likely to remain an ongoing challenge in the future, with the Committee keen to explore the measures being put in place to adapt and address

weather-related obstacles. In response, the Committee were advised that whilst Continental Landscapes had sought to purchase electric machinery, where concerns about poor weather affecting the use of this equipment had been identified, they had sought to hire alternative machinery powered by a low carbon fuel, which permitted grounds maintenance activity and verge cutting in wet or more challenging weather conditions and would be used going forward. Additionally, plans were being developed to undertake grass cutting earlier in the season to better manage weather-related challenges.

Members expressed concerns about the effectiveness of electric machinery in certain weather conditions, with additional questions raised regarding whether the electric machinery was operating at full capacity, given the challenges mentioned in the report. There were also concerns around whether purchasing low carbon fuel, which was approximately four times the cost of petrol, was a suitable use of resources. Members also noted that high grass verges concealed cans and broken bottles, posing a hazard to people and animals. As a further issue highlighted, the Chair sought details about who bore the additional costs of hiring the new machinery and the extra expense of using low carbon fuel. In response, Paul Norton (Continental Landscapes) clarified contract arrangements. The Committee were advised that when machinery was purchased for the contract, it underwent rigorous testing and multiple demonstrations over several weeks. These tests showed that under normal conditions the electric machinery used in parks and on verges could operate for 7-9 hours per day, depending on the length of the grass. In terms of initial performance, as a result of the initial verge cutting programme being delayed due to early-season rain, the grass had grown rapidly and by the time it was dry enough had become too long and damp, which drained the battery of the electric machinery. In response to these issues, additional machinery had been added to the contract and alternative fuels investigated for running the equipment. The Committee were advised that Continental Landscape had borne the costs of the machinery as well as the fuel and would continue with that commitment.

- Reference was made to paragraph 3 regarding the various aspects of the Grounds Maintenance Contract with specific queries relating to the maintenance of waterways. In response, Members were advised that the contract specification included clearing general litter from the waterways. A notable challenge for Continental Landscapes was the removal of larger items found in waterways, including fly tip bags of waste containing building materials, shopping trolleys and bikes. The review referred to during the introduction of the report would provide a more detailed exploration of the impact on waterways. Following on from the previous question, details were sought about why the inclusion of a haulage vehicle with chain that could be used for removing larger waste items from waterways had not been included within the initial contract specification given access the previous contractor had to similar machinery, and what the costs would be if that were now to be added. The Committee were advised that the costs would not be known until those options were explored. The reason a vehicle for removing larger waste items from waterways had not initially been considered was that such incidences were sporadic, although these were now recognised (through the contract monitoring process) as increasing and as a result options were being

explored in relation to a potential enhanced partnership arrangement with Veolia to access equipment they operated.

As a separate issue, questions were raised about access issues when it came to waterway clearance. Members were informed that access to waterways largely depended on the type of waterway involved, with access more challenging for areas with steeper banks. The Council had liaised with Thames Water, Thames 21, and the Environment Agency to explore the most appropriate access points and were also undertaking a comprehensive review of access issues based on recognised fly tipping hotspots to understand how best to be able to address and access these sites safely.

Further details were also sought on the collaboration being undertaken with Thames 21 and if they were continuing to use their resources to support Continental Landscapes work on waterways. In response, the Committee heard that the Council was continuing to work with Thames 21 and also remained part of the Brent River Catchment Partnership to gain insight into the interconnections between the waterways flowing through Brent.

- Moving on, details were then sought on the reference to the monitoring of poor quality/inappropriate work undertaken by the Community Payback Service such as cutting down healthy trees. Members posed questions around the scope in the contract for Continental Landscapes to provide horticultural supervision of the work of Community Payback teams to help support the aims of the contract whilst also developing the skills of those on probation being supervised through the service. In response, Paul Norris (Continental Landscapes) advised that whilst working closely with Friends of Parks Groups they had not yet had direct connection with the Community Payback Service. The opportunity to establish such as connections would, however, be welcomed as a means of seeking to offer meaningful work opportunities and deliver improvements to the service area.
- As a further issue in relation to contract delivery, reference was made to section 3.11 of the report and challenges identified around staffing. Clarification was sought on the issues identified and why it had not been possible to identify these during the initial tender process along with the due diligence conducted at the tender stage to ensure these would not remain as issues once the contract had commenced. In response, members were advised that this had involved problems with the reading and uploading of data by staff through the Fix My Street reporting system. In terms of lessons learnt the Committee were informed that, for this contract, there had been a mapping of all parts of the borough included under the contract, which was something that had not been previously undertaken. It was noted that Fix My Street was not in place at the point of tendering. Love Clean Streets as a system was in place at that time. At the point of the tendering specification, an IT system was explored to connect with staff on the ground who were using handheld devices with the integration of Fix My Street having subsequently taken place later and staff therefore requiring additional training on use of the new system. Furthermore, it was noted that whilst there had been some staffing issues, Continental Landscapes had worked quickly to recruit additional staff with the recruitment of appropriately trained and qualified grounds maintenance staff recognised as a problem across London.

- Following on from the previous question, reference as also made to paragraph 3.5 within the report in relation to improvement in staff morale under the new contract and on what evidence this had been based. Additional questions were raised about the factors that had contributed to this assessment. Members were keen to seek details on whether staff morale had improved, and if there was any evidence of improved productivity from the previous contract. In response, the Committee heard that the issue with staff morale did not necessarily indicate poor morale under the previous contract. The transition of staff between the old and new contracts caused a period of anxiety and uncertainty regarding the change. It was important that the incoming contractor reached out to staff providing the right level of engagement and training from the outset as a willing and caring employer. It was added that during the commencement of the contract, one-to-one meetings, comprehensive staff training and engagement had been undertaken. Members were also advised of the annual staff appraisal process and staff surveys which had been undertaken. Paul Norris (Continental Landscapes) advised that employee morale was taken seriously within the workforce with the company committed to a process of continuous invest in their staff. The Committee expressed interest in receiving information about the staff survey results for future reporting as a means of identifying any specific trends, although it was recognised these would be focussed on the staff group as a whole.
- As a separate issue the Committee then moved on to focus on challenges relating to ground maintenance provision within housing estates, which it was noted often related to disputes around land ownership and responsibility between different housing providers and the Council. In response, Members heard that through a process of liaison with housing colleagues and land registry searches investigations had been undertaken to address issues relating to land ownership and areas included within the contract. If it was discovered disputed land fell under the ownership of the Council or had not been included a variation would be arranged to ensure this was added to the contract, following a cost estimation. Members were advised that Continental Landscapes were currently working on variations for housing sites and small pockets of land that had not been included in the original scope of the contract, which would involve an uplift of £38,000 in the contract price, The Chair enquired further as to whether the scale of variation was manageable and accounted for under the financial planning process for the contract with it confirmed that both the number of sites and the associated costs were manageable and had been accounted for within the wider costs of the contract.
- Returning to staffing issues, details were sought around how Continental Landscapes sought to retain staff. In response, Paul Norton advised of the TUPE arrangements established as part of the award of the new contract designed to support the transfer and retention of staff. Additionally, an apprenticeship scheme had been established with the company committed to continue investing in training with the aim of retaining staff and boosting job satisfaction.

- The Committee then turned their attention to the position regarding the clearance of litter on verges, with members advised that this remained the responsibility of the Council's Street Cleansing contractor. It was recommended that this area of work be reassessed to ensure a more co-ordinated approach was established between the grass cutting and street cleansing programme given the level of complaints being received by local ward councillors, with specific concerns highlighted in relation to Sudbury, Wembley, and Alperton.
- Continuing on the issue of litter and fly-tipping reference was made to the detail provided within section 3.28 of the report given the large number of reports related to fly-tipping and littering continuing to be received. Highlighting concerns relating to the time taken to respond to these reports, further details were sought on the relevant KPIs and standards being adhered to. In response, the Committee were advised that the integration of Fix My Streets to the litter clearance schedule had not been in place when the original KPIs were drafted. This would, however, now form part of the review process identified at the start of the meeting in order to consider response times for litter clearance and whether there were any new KPIs that needed to be integrated as a result. There was currently a statement of reasonable time in place, which amounted to approximately 5 days for the clearance of overflowing litter bins within parks or open spaces. As part of the annual report, a more detailed review of the KPIs for litter clearance would be conducted to ensure their effectiveness and the information was clear to local residents. Following up, Members raised questions about what information the public would receive regarding the KPIs to be agreed. The response was two-fold, relating to how KPIs were practical and meaningful for members of the public, and the schedule and times of year the works were carried out. Housing colleagues were already displaying notifications on housing boards which set out expectations for works to be carried out. These actions helped members of the public to find out when works were due, expected and when they had not been undertaken.
- In terms of litter bin clearance, members highlighted the details provided within paragraph 3.26 of the report which provided figures on overflowing litter bins being dealt with in sufficient time (currently only 66%) and queried whether alternative solutions, such as larger bins, could be explored. Whilst recognising the issues highlighted, members were advised that larger bins often attracted more large waste items being left in them. The use of larger bins was not therefore currently being recommended given the efforts being made to discourage fly tipping and also in recognition of the impact on size of the vehicles that would be required to deal with the increased capacity of the bins.
- Further details were also sought around specific targets relating to biodiversity and climate change commitments. In response, it was confirmed that whilst specific targets did not currently exist the opportunity to develop targets was due to be considered as part of the review process previously highlighted. Members advised they would be keen to ensure this was picked up as a recommendation arising from the review with the Parks and Green Infrastructure team encouraged to liaise with the Climate Action team to produce more specific targets.

- As a final issue raised, reference was made to paragraphs 3.3. and 3.18 within the report relating to the quality of maintenance of sports pitches based on feedback provided by sports clubs. As a specific example, the Chair cited the example and concerns raised about drainage works affecting East Lane sport pitches querying if these types of works and the maintenance of drainage measures were included as part of the regular maintenance programme or needed to be included as variation of the contract.. In terms of the specific site highlighted, Kelly Eaton acknowledged the concerns and outlined the work being undertaken to address the specific problems identified which (given the initial approach identified) had not been included as part of the original contract specification. There were similar minor impacts across some other sports pitches though these were not to the same extent as those experienced at the East Lane and Vale Farm sports pitch sites. An assurance was provided that work was ongoing with Continental Landscapes in order to seek a final remedy, enabling the ditches to be permanently reinstated and reseeded on which it was hoped to be able to provide further feedback over the next week.

Given the time remaining and in seeking to bring consideration of the item to a close, the Chair thanked officers and Members for their contributions towards the review of the first year of the Grounds Maintenance Contract. In view of the issues highlighted during the discussion the actions agreed as an outcome of the scrutiny process were **AGREED** as follows:

Suggestions for improvement

- (1) To publish a user-friendly summary of the annual report for residents highlighting expected standards, performance, key achievements, challenges, and priorities of the Grounds Maintenance contract.
- (2) To improve coordination and scheduling between Continental Landscapes and Veolia for verge cutting and street cleansing operations across the borough.
- (3) To work more closely with probation and community payback teams to create a focused work programme for offenders, exploring opportunities for relevant training and skills development.
- (4) To enhance communication and collaboration with volunteer groups (e.g., 'Friends Of' groups, Thames 21, etc.)
- (5) To consider introducing larger and more varied bins in problem areas in parks/open spaces to reduce littering and fly-tipping.

Information Requests

- (1) To provide a high-level overview of the differences between the current and previous contract specifications, focusing on significant changes, new features, enhancements, and any potential shortcomings.

- (2) To provide an annual report of the Grounds Maintenance contract's first year performance, highlighting key performance metrics, successes, challenges, and priorities for year 2.
- (3) To provide biodiversity key performance indicators (KPI's).
- (4) To provide a strategic plan and roadmap to restore Brent parks to green flag standards.
- (5) To provide action plan for the ongoing maintenance and improvement of sports pitches throughout the borough.

9. **Delivery of Affordable Housing by i4B Holdings Ltd and First Wave Housing Ltd**

Peter Gadsdon (attending the meeting as a Council appointed Director on i4B/First Wave Housing Boards) was invited by Councillor Muhammed Butt (as Leader of the Council and attending to represent Councillor Tatler as Cabinet Member for Regeneration, Planning & Growth) to introduce the report providing an update on the financial and strategic performance of i4B Holdings Ltd (i4B) and First Wave Housing Ltd (FWH) as wholly owned local authority companies. In noting the role and remit of both companies the Committee were advised that i4B had been set up in 2016 with the purpose of acquiring, letting and managing a portfolio of affordable, good quality private rented sector (PRS) properties in order to support efforts to alleviate homelessness and supporting a reduction in the use of temporary accommodation. The company acquired properties on the open market, including individual units and occasionally larger blocks of housing. It was noted that a Business Plan and financial model had been established and was closely monitored by the Board with the Committee keen to review impact of the investment decision made by the Council to support the company in seeking to achieve key strategic priorities. It was also noted that i4B was restricted in the types of housing it could purchase, as it needed to fall within the affordable band. At present, i4B held 446 properties, with 61 x1 bedrooms, 191 x2 bedrooms, 141 x3 bedrooms and 53 x4 bedroom units. These included a number of properties located within the Home Counties, which whilst managed through Mears as an external agent, had become increasingly difficult to let as households became more reluctant to relocate away from family or support networks leading to the Board, as opportunities became available, seeking to dispose of these units and reinvest in properties closer to Brent. For the properties located in Brent, the company operated a Service Level Agreement (SLA) with Brent's Housing Management service to provide housing management, corporate and financial, property purchasing and refurbishment services.. This enable the company to operate with minimal staff and to benefit from economies of scale in terms of operating costs with a comprehensive monitoring framework in place to ensure operational performance met targets within the SLA.. Investment decisions were highlighted as having provided benefits to the Council with attention drawn to table 4.4 within the report, which illustrated that i4B had housed and discharged the Council's housing duty to 473 families, the majority of whom were previously housed in stage one Temporary Accommodation (TA). The number of families housed was higher than i4B's PRS portfolio due to a number of families moving on to other accommodation, with new families moving in. Table 4.7 within the report, highlighted that this was estimated to have provided a net cost

avoidance of £88k each week achieved by moving 355 households from TA into i4B units.

In terms of First Wave Housing (FWH) members were advised this was a company limited by guarantee established as a registered provider of social housing to manage the property portfolio previously owned by Brent's (now dissolved) Arms Length Management Organisation, Brent Housing Partnership. The company owned 216 street properties and one commercial unit with a breakdown of unit mix provided within section 3.2.2 of the report. Similar to i4B, FWH had also been set up to bring greater diversity and flexibility to the delivery of the Council's housing objectives. As a Registered Provider (RP), FWH had the opportunity to access grant funding through the Greater London Authority (GLA) and remained available for such opportunities. The company also operated under a Business Plan and an SLA with the Council to support their operation including corporate, financial and legal services as well as to support their landlord functions in relation to housing management, repairs and voids.

Both companies operated with the same Board of Directors with the appendices included within the report detailing the key objectives within the i4B and FWH Business Plans as well as updates on the progress of tasks over the previous financial year and the companies' four strategic objectives identified as follows:

- Providing a consistently good housing service
- Delivering safe and sustainable homes
- Running a viable business
- Increasing the supply of affordable housing in the borough

Members were informed that in addition to the regular Shareholder and Guarantor meetings held between the Chair of Board and Council strategic overview on delivery of the objectives within the Business Plan was also provided through the Audit & Standards Advisory Committee with operational housing management performance subject to review by the Community & Wellbeing Scrutiny Committee and the Resources & Public Realm Scrutiny Committee involvement focussed around the effectiveness of any investment decisions and strategic housing element. Whilst the Chair of the Community & Wellbeing Scrutiny Committee had therefore also been due to attend the meeting for this item, Councillor Conneely advised that he had unfortunately needed to submit his apologies.

Having thanked Peter Gadsdon for his introduction the Chair then moved on to invite questions and comments from the Committee in relation to the update provided in relation to the role of both companies in the delivery of affordable housing, with the following comments and issues discussed:

- As an initial query further details were sought around the decision to include the Fulton Road development under FWH rather than i4B ownership. In response, Peter Gadsdon (as Director i4B/FWH) explained that this was due to FWH being classed as a Registered Provider (RP) which enable the development to attract grant funding contributions under the GLA's Affordable Homes programme.
- Views were then sought regarding whether it was felt the investment decisions made in relation to i4B and FWH had been effective and, if so, what specific

factors had made them successful. In addition, questions were raised about the benefits that would not have otherwise been realised if the Council had carried out these operations directly. In response, Members were advised that the investment decisions with regard to i4B and FWH were felt to have been effective in terms of delivery of the expectations set by the Council. i4B and FWH both offered secure, settled housing of a high standard with a responsible landlord and had supported the Council in the discharge of its homelessness duty. Further questions were raised about whether there were any constraints in the companies from being more ambitious, and if there was anything the Council could do to overcome those constraints. The Committee heard that there were no constraints other than the pace at which properties could be purchased, as these could only be acquired if they aligned with the financial model to ensure viability.

- As a further issue highlighted, members noted that i4B had been set up to respond to legal constraints on Brent's housing strategy in terms of borrowing requirements with members therefore seeking clarification on whether, now the Council was operating in a different legislative and economic climate, i4B was still needed to deliver new properties or whether this could be achieved in a different way. In response, members were advised that FWH was created to manage the residual stock previously managed by Brent Housing Partnership (BHP) that was not in the Housing Revenue Account (HRA). There were a number of grant attachments within that which needed to be fulfilled otherwise the funds would need to be returned. The reason i4B was set up was to enable the purchase of properties on the open market and providing a good landlord in the private sector, where the Local Housing Allowance (LHA) rent could be charged, and housing could be provided to people in temporary accommodation rather than to avoid constraints in relation to the HRA. Additional details were requested in relation to the net cost avoidance of £88k which had been referred during the introduction, with members advised this had been based on an assessment that had the families not been housed, the Council would have incurred additional costs for temporary accommodation, constituting cost avoidance.

Further details were also sought in relation to viability assessments. Amanda Healy (Deputy Director Investment and Infrastructure) explained that where companies conducted financial assessments for purchasing new properties, they considered only the cash flow directly relevant to the company. As a result, the £88k cost avoidance would not be taken into account and would not affect acquisition calculations. There was no cashflow benefit to the company because it was not responsible for housing the families; this responsibility fell to the Council, who gained from the company's provision. As a result, the Chair sought details as to whether it was felt the Council could set more ambitious strategic priorities. In response, Alice Lester (Corporate Director Neighbourhoods and Regeneration) advised as the shareholder representative that the Council was not overly risk averse, but needed to undertake actions that would not adversely impact its financial position. From a shareholder perspective it was felt that i4B and FWH were both achieving the outcomes originally identified by providing good quality homes for those in need while ensuring financial viability with the Boards effective at reviewing and monitoring the activity of both companies to ensure they were delivering as much as possible while remaining financially prudent.

- Following on from the previous comments, members also sought details on the potential for i4B to be able to issue bonds, to which the response was that this would be difficult under the current structure given the company was wholly owned by the Council as a single shareholder. It was not felt there would, therefore, be any additional benefit to be achieved by seeking opportunities to explore alternative sources of investment such as, for example, through the Council's Pension Fund who it was pointed out would also be prevented from investing in Council related activity under existing regulations.
- Further clarification was requested around the relationship between FWH and the HRA cap. Amanda Healy (Deputy Director Investment and Infrastructure) responded that this related to FWH establishment to manage the property portfolio previously owned by Brent's (now dissolved) Arms Length Management Organisation, Brent Housing Partnership. When dissolved all core housing stock had been transferred back to the Council's HRA with the exception of those now managed through FWH as a Registered Provider.. The report provided for the Committee had outlined a selection of properties that required grant funding specifically from registered providers, which continued to be managed by the company. It was noted that i4B's delivery involved General Fund Housing, which was not tied to the HRA cap. The type of provision and tenancies offered could not be supplied under the Council's umbrella, so they needed to be provided by the company instead. Hal Chavasse (Strategy and Delivery Manager) added that in terms of rental rates, properties transferred back to the Council would need to be charged at social rent levels which were lower than the Local Housing Allowance that i4B could charge.
- Members then moved on to raise a number of questions around the housing rent charged by i4B. The Committee were advised that i4B charged the Local Housing Allowance rent set by the government at the 30th percentile of average rents in an area which also sought to incorporate Universal Credit and Housing Benefit income. Clarification was provided that the acquisitions policy whilst not exclusive to Brent was now increasingly focussed within the borough and surrounding area.
- The Committee then turned their attention to the position around the current sources of grants available to support FWH as a Registered Provider and also i4B. In response, members were advised that the main source of grant funding was currently provided through the GLA. It was noted that, when evaluating any housing opportunity, housing companies considered both general fund and HRA delivery options to ensure the best value for the units being acquired or transferred to the companies as part of their viability assessment. Members sought details around whether there were any indications from the new government regarding how housing programmes might be managed, organised, funded, and developed in future. The Committee heard that greater flexibility was consistently sought in lobbying efforts in order to provide access to Local Authority Housing Fund by local authority housing companies.

- Given the substantial savings identified in relation to cost avoidance on the Council's temporary accommodation bill, members queried if it would be prudent to factor these into viability assessments when exploring further opportunities to reduce expenditure. It was noted that within the Council, there was currently an overspend on the budget between £10 - 15m pounds. The Leader highlighted, that whilst not risk averse there were a number of challenges associated with examining viability assessments and emphasised that careful considerations, including staffing capacity and borrowing limits, needed to be taken into account when seeking to expand the activity undertaken through i4B.
- Moving on, members then drew attention to paragraph 6.3.2 of the report around tenant feedback and the need for improvement with members highlighting delays in responses being provided for tenants, and concerns about the potential for feedback to be ignored or overlooked. Questions were raised regarding the accuracy of the collected feedback and the frequency with which it was reviewed. In response, members were advised that as of April 2024, The Regulator of Social Housing had introduced new tenant satisfaction standards, including tenant surveys. Currently, periodic surveys had been conducted, but efforts were underway to enhance the understanding of these surveys and to develop action plans accordingly. Starting in October 2024, a separate reporting hierarchy for housing complaints would be established with these reports reviewed and acted upon by the Board.
- Referring to paragraph 6.4 of the report relating to the Building Safety Act 2022 and i4B's response regarding one of their housing blocks in Wembley Park, Lexington. Members were keen to seek details around the lessons learned from this experience, and how they had been applied to other buildings subject to similar requirements. The Committee were advised that responsibilities for building safety were shared with Quintain, the estate owner. Confirmation was provided that i4B had commissioned fire risk assessments and arranged for fire safety works to be undertaken with maintenance logs also being maintained.
- As a further query, members drew attention to paragraph 6.4.5 within the report concerning the development of an asset management strategy and the significant focus on improving energy performance across housing stock including the potential viability for retrofitting. In response, Hal Chavasse (Strategy and Delivery Manager) highlighted that a programme of surveys had been carried out which covered around 80% of the properties for general capital maintenance, kitchen replacements, bathroom replacements and necessary energy works, all of which had been incorporated into the company Business Plans. Whilst work continued to review the assumptions in relation to the stock that had not been surveyed, the Business Plan was felt to remain viable.

Following on, members advised they were keen to explore the approach taken by i4B and FWH to the retrofitting and eco standards of the properties they owned when compared to that of the Council. The Committee heard that more than half of i4B and FWH properties currently met the energy C rating.. It was, however, recognised that additional work still needed to be undertaken for properties in blocks that needed refurbishment.

- Members then moved on to focus on paragraph 6.5.3 within the report regarding the internal audit carried out on the financial controls and billing arrangements for the companies, and the improvements identified with details sought on the controls in place to ensure the companies were operating in accordance with their policies and procedures and that the necessary oversight was being provided. Hal Chavasse (Strategy and Delivery Manager) responded that the issues identified had partly been due to staff turnover resulting in established processes that had previously been effective not being consistently adhered to. Payments were being made for work as required however, as the audit highlighted, effective communication between officers was relied upon, which typically was not an issue but became problematic during periods of staff turnover. Further questions were raised about the sign off of procedures and policies by the company Boards, to which the response was that there was a list of matters reserved for the Board and also delegated to officers. Matters which fell within operational policies were agreed by the relevant Heads of Service and Corporate Directors within the SLA management teams as opposed to the Board.
- Moving on, details were also sought in relation to the staffing structure of i4B and FWH and how the distinction between staff focusing on i4B and FWH was maintained under the SLA. In response, members were advised that staff allocated to support i4B and FWH were based on an approximate split (reflecting the level of stock held) of two thirds to one third between i4B & FWH. The level of service provided was based on the requirements of the stock as opposed to funding dedicated posts with the costs charged for officer time calculated through the SLA and no officers directly employed to support an individual company.
- As a further query, members drew attention to paragraph 4.7 within the report relating to the potential around surplus rents being used to invest in new supply. Details were sought on how this could be delivered and more generally on how profits from not only i4B but FWH were reinvested. In response, members were advised that whilst i4B had now achieved an initial profit the surplus generated by FWH was lower with any surpluses the companies made being used to invest in new supply or the maintenance of existing supply, including asset management.
- Members then moved on to query the potential scope to undertake an investment programme aimed at supporting individuals living in underoccupied properties to relocate closer to their families by acquiring suitable properties for their needs, thereby freeing up much needed larger properties. The Leader responded, advising that the Council had an incentive scheme to work with individuals living in underoccupied properties although the process in seeking to encourage relocation was often challenging.

At this stage in proceedings, the Committee agreed to apply the guillotine procedure under Standing Order 62(c) in order to extend the meeting for a period of 15 minutes to enable conclusion of the item and remaining business on the agenda.

In continuing, members recognised the challenges identified but felt part of the issue remained the ability to offer properties attractive enough to encourage

relocation. What was important was acquiring a specific property that met the individuals' needs, especially if it was located near relatives who could provide support with the same issues arising in terms of out of borough placements. In terms of the acquisition and management of properties within the Home Counties confirmation was provided that as opportunities were identified the aim would be to repurpose or seek opportunities to dispose of them.

- With reference to paragraph 6.5.2 of the report, members then moved on to question what could be done to better manage void times with the existing contractor including the use of penalties where performance standards were not met. In response, Hal Chavasse (Strategy and Delivery Manager) explained that as referenced in the report, there were currently no penalty mechanisms in the contract but that i4B were in the process of retendering to tighten up the contract specifications. Peter Gadsdon (Director i4B/First Wave) added that one of the primary challenges with the existing contractor was not their turnaround time but rather the nomination process. The property would be prepared to ensure that it was fit to rent, however delays could then be experienced in getting the right nominees. Additional questions were raised around whether there was a way to streamline this process, given the large waiting list for housing. In response, the Committee was advised of the close working relationship with the Housing Needs Service along with the challenges in seeking to identify appropriate nominations, particularly in relation to out of borough placements with Councillor Muhammed Butt highlighting the number of relevant considerations needing to be considered including family size, where the children attended school, and where the parents worked, all of which determined the suitability of a property to families and could lead to delays.
- The Committee then moved on to reference paragraph 4.3 within the report on the breakdown of i4B purchased properties and the predominance of 2 bed properties in the portfolio. Questions were raised about whether i4B was in greater need of larger sized properties and if there was a financial borrowing issue as to why there was a predominance of 2 bed properties in i4B's portfolio. In response, Peter Gadsdon (Director i4B/First Wave) explained that whilst the turnaround time for offers to those on the Housing Needs register for smaller sized properties was shorter the need to acquire larger sized properties was also recognised given the much longer waiting times for households requiring 3-4 bed sized properties. Whilst i4B were therefore keen to acquire as many larger sized properties as practicable, the opportunities available to do so were more limited due to the price and viability in relation to the company Business Plan and financial model.
- Returning to the issue of compliance with the Building Safety Act concerns were highlighted around issues surrounding the Lexington block, including lift maintenance and operation of fire alarms with details sought about the specific lessons learned that would be implemented in procedures and policies moving forward. In response, Members heard that issues raised at Lexington were part of the management arrangement which compliance and Mechanical and Electrical (M&E) teams delivered on behalf of i4B with an assurance provided that the concerns highlighted had now been resolved. Moving forward, the development teams managing the building at Fulton Road and other schemes had provided assurance that the Compliance and M&E

teams would be involved at an earlier stage in the handover of those blocks so that these issues did not reoccur in future. It was also noted that Quintain bore responsibility for certain areas of the development, including communal areas and gates with i4B's responsibility including the interior of the blocks. There was a relationship between Quintain as the freeholder, i4B and tenants to ensure that where issues reported were not resolved, appropriate escalation routes were available.

- As a final issue, the Committee then moved on to focus on details around the application of section 106 agreements to support the acquisition of properties by the companies. In response, Alice Lester (Corporate Director, Neighbourhoods and Regeneration) advised that it would be possible as part of the affordable housing element within s106 development agreements for developers to explore whether a Registered Provider (such as FWH) may be interested in acquiring the affordable housing units within a development although this was often not identified as a viable option.

Given the time remaining and in seeking to bring consideration of the item to a close, the Chair thanked officers and Members for their contributions towards scrutiny of the Council's delivery of affordable housing by i4B Holdings Ltd and First Wave Housing Ltd and as a result of the outcome of the discussion, the recommendations, requests for additional information and suggestions for improvement identified were **AGREED** as follows:

Suggestions for improvement

- (1) To explore further opportunities for i4B/First Wave Housing Ltd to reduce temporary accommodation costs and expand the supply of affordable housing in a sound yet non-risk adverse manner.
- (2) To consider revising the viability assessment criteria to account for factors like temporary accommodation cost avoidance in order to support the delivery of more affordable housing via i4B/First Wave Housing Ltd.
- (3) To explore carrying out targeted work to source/purchase specific properties for households wishing to downsize and relocate outside of the borough.
- (4) For I4B/First Wave Housing directors to strengthen their oversight of policies and procedures to prevent a recurrence of the issues identified in the internal audit.

Information Requests

- (1) To provide details of any Section 106 properties acquired through I4B Holdings Ltd.
- (2) To provide details of any potential Section 106 acquisitions that were not pursued due to viability issues, including the specific reasons for each case.
- (3) To provide asset management strategy upon completion.

- (4) To provide a breakdown of the expected costs associated with enhancing energy performance and retrofitting the I4B/First Wave Housing stock.

10. **Scrutiny Progress Update – Recommendations Tracker**

The Committee noted the Scrutiny Recommendations Tracker report and update on key actions and information requests identified.

11. **Any Other Urgent Business**

No items of urgent business were identified.

The meeting closed at 9.14pm

COUNCILLOR RITA CONNEELY
Chair

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Brent

MINUTES OF THE RESOURCES AND PUBLIC REALM SCRUTINY COMMITTEE
Held in the Conference Hall, Brent Civic Centre on Wednesday 2 October 2024 at
6.00 pm

PRESENT: Councillor Kennelly (Vice-Chair in the Chair) and Councillors Ahmadi Moghaddam, S Butt, Dixon, Georgiou, Long and Mitchell

Also Present: Councillor Muhammed Butt (Chair of the Barham Park Trust Committee) and Councillor Lorber (representing the members who had called-in the decision)

1. Apologies for absence and clarification of alternate members

Apologies for absence were received from Councillors Conneely (Chair), Maurice, Molloy and Shah.

2. Declarations of interests

Councillor Lorber declared a personal interest in respect of Agenda Item 3: Call-In: Barham Park Trust Committee decisions (10 September 2024) - Strategic & Operational Property Matters relating to Barham Park Estate as a Director and Trustee of the Friends of Barham Library who occupied Unit 4 in the Barham Park building. In addition, he advised he was also a Trustee of the Friends of Barham Park and had a close association with other tenant organisations currently occupying the Barham Park building including Barham Veterans Club and Tamu Samaj UK. He also advised he had previously been approached by the applicant in relation to the planning application for the site at 776 & 778 Harrow Road.

Referring to advice he have received in advance of the meeting from the Corporate Director Law & Governance, Councillor Lorber advised that having spoken to present the call-in he would then withdraw from the meeting for the duration of the item.

Councillor Georgiou declared a personal interest as one of the Councillors who had signed the call-in request.

No other interests were declared at the meeting.

3. Call-In: Barham Park Trust Committee decisions (10 September 2024) - Strategic & Operational Property Matters relating to Barham Park Estate

In opening the item, the Chair advised that the meeting had been arranged, in accordance with Standing Order 14, to consider a call-in submitted by five members of the Council in relation to decisions made by the Barham Park Trust Committee on 10 September 2024 regarding the following items:

- (a) Strategic Property Matters relating to Barham Park; and following on from this report
- (b) Operational Property Matters relating to Barham Park

In considering the call-in, the Chair reminded the Committee that the line of questioning must remain specifically within the remit of the call-in and that issues raised on anything wider would not be valid and ruled out for consideration.

Having clarified the basis of the call-in, the Chair then proceeded to invite Councillor Lorber to outline the reasons for the call-in as representative of the members who had supported its submission.

In presenting the call-in, Councillor Lorber highlighted the following key issues as the basis for which the decision had been called-in:

- The call-in had related to all of the decisions made in relation to the Strategic Property review and six out of the nine subsequent decisions taken in relation to the Operational Property review.
- The Members who had submitted the call-in felt strongly that the advice provided to the Trust Committee was inadequate and that Trustees had not been provided with information that they had previously requested in relation to provision of a Business Plan, detailed costings, Investment Plan and analysis of any legal risks associated with the development option identified.
- In presenting the proposals to the Trust Committee, Trustees had been advised that 2031 would be the key date for achieving vacant possession of the various units, effectively deferring the implementation of the proposals until that year, which appeared to have been accepted with no challenge or questions asked.
- The report provided had also not included reference to any potential risk relating to Sure Start grant clawback in relation to Unit 8 being vacated given that grant agreement was not due to expire until 2034 which it was felt required further consideration given the potential financial impact and delay in being able to achieve vacant possession.
- Concern was also expressed at the decision seeking to develop proposals to expand the Trusts charitable purpose for submission to the Charity Commission in order to allow broader use of the Barham Park building as part of the process in taking forward the Strategic element of the property review, which it was highlighted would be strongly opposed by local residents. It was pointed out that no representations had been permitted from stakeholders or members of the public at the Trust Committee meeting on 10 September 2024 despite clear guidance from the Charity Commission, which stated that not only did Councils have particular and specific responsibilities when dealing with a charity, but a Council who is effectively a Trustee had an extra responsibility to ensure that it properly engaged with members of the public and local community. Councillor Lorber highlighted what was felt to be a

further year of inactivity in relation to meaningful engagement with existing tenants and local residents following the initial decisions taken by the Trust Committee in 2023 on the initial outcome of the feasibility study and options to be pursued in relation to the strategic property review, the opportunity to allow interested parties to make representations at the most recent meeting in 2024 had also been denied.

- Attention was then drawn to a number of concerns relating to operational property matters that had been agreed by the Trust including changes to the delegation of day-to-day Trustee functions and decision-making authority to officers. It was felt that the previous delegation of these powers had failed, resulting in missed opportunities to generate income for the Trust, failure to implement terms of leases and rent reviews, deal with rent collection and debt recovery and apply appropriate rates of interest. In recognising the fiduciary duties on Trustees, the call-in was therefore seeking a full review of the Trust's governance arrangements with Trustees needing to be aware of the implications of their decisions.
- Additional concerns highlighted as part of the call-in included the management of leases, particularly those which had now expired and financial impact on the Trust, which the members who had called-in the decision did not feel had been adequately addressed in the advice provided for the Trust Committee. As an example, reference was made to officers commissioning independent valuations and to the issue of Section 25 notices without stating who the Independent Valuer would be or what the costs of obtaining those valuations would be or making it clear that most of the Section 25 Notices related to unprotected leases.
- In summing up, the Committee were advised that the call-in had identified eight primary areas where complex operational decisions made by the Trust Committee on the 10 September 2024 were felt to be flawed based on a meeting lasting just over 20 minutes and with no public representation permitted which had led to the decisions being called in for further consideration.

The Chair thanked Councillor Lorber for summarising the reasons for the call-in and invited Members to ask any questions they had in relation to the information presented.

- Clarification was sought on why it had been felt the Trust would be required to wait until 2034 before they could implement the preferred bronze development option as part of the Strategic Property Review. Councillor Lorber advised this view had been based on the position regarding the clawback of Sure Start grant linked to provision of a Children's Centre within Unit 8 of the building. In explaining the background to the original decision to lease Unit 8 to the Council for the purposes of providing a Children's Centre, it was felt that whilst the Unit was no longer being used for its original purpose should the arrangements cease in advance of the expiry of the grant period in 2034 this may trigger a risk that some of the grant funding could be clawed back. The members who had called in the decision felt this issue had not been

sufficiently addressed within the report provided for the Trust Committee in terms of 2031 being identified as the year of the longest lease expiry. The opportunity was also taken to highlight the view that a genuine Children's Centre had failed to operate from the premises for a number of years with the current arrangements in place involving the provision of coordinated youth services by the Young Brent Foundation having been established (it was felt) to avoid a possible clawback of the Sure Start Grant.

- Members sought details on whether there was precedent for Sure Start grant funding to have been clawed back Sure Start elsewhere. Whilst advising this would be a matter for officers to address, Councillor Lorber highlighted that advice provided for the Trust Committee had identified this as a potential risk. In his view, the report presented to the Trust Committee had included a number of unanswered questions regarding the potential level of any clawback and whether liability for this would rest with the Trust or the Council. In the view of the members who had called-in the decision, the fact that the Childrens Centre was a Council led service would imply that the responsibility for any clawback fell on the Council, but irrespective of this view, it was felt the position needed to be clarified before any further decision was agreed regarding the leasing of Unit 8.
- Referring to Barham Park in general, Members sought clarification on the wider facilities available for the public in the park as opposed to the building. In outlining the range of facilities, Councillor Lorber made specific reference to the Queen Elizabeth II Garden and pond, which had benefitted from improvements funded through Neighbourhood Community Infrastructure Levy (NCIL) funding supported by the Friends of Barham Library. The park also attracted many visitors as a valued local community facility for casual walking and leisure activities in the playground and open green areas, but it was primarily the activities taking place in the building that contributed significantly. This use included the Barham Veterans Club, which had been running for over 70 years providing support to tackle the issue of loneliness and isolation amongst older men. Tamu Samaj UK, a Nepalese run local Community Centre as well as the Friends of Barham Library, which in addition to extensive local community use (including access to the only available toilet in the park) also provided a home to a memory lounge for people with dementia and their carers.
- Following on from the previous question, details were sought on other leisure facilities in the park aside from a playground and outside gym, to which the response from Councillor Lorber confirmed this was based on the availability of green open space in an urban area. All of the facilities and space available was well used as a popular and well-loved park. There were also funfairs that took place in the park twice a year.
- As a further issue raised in relation to the length of the September 2024 Trust Committee meeting further details were sought on whether, given no public representations had been made at the meeting, requests to speak had been submitted. In response, Councillor Lorber confirmed that whilst requests to speak had been submitted these had been refused for which, he felt, no valid reasons had been given. In highlighting that the Charity Commission encouraged Trusts to engage with the public he pointed out that the Friends of

Barham Library had and would continue to attend meetings of the Barham Park Trust Committee and wished to positively engage with Trustees in order to support and maintain the objectives of the Trust and continue upholding the wide-ranging community use of all facilities within Barham Park.

- Further details regarding when and why the restrictive covenant relating to the use of the residential properties at 776 and 778 Harrow Road had been established were also sought by Members. In explaining the background to establishment of the restrictive covenant, Councillor Lorber advised this had been put in place to restrict the scale of any future development on the site currently occupied by the two original staff cottages within the Park site at the time of their disposal being considered as a means on providing funds for reinvestment into the Park Estate. Following sale of the properties and approval of planning permission for redevelopment, negotiations remained ongoing with the developer regarding the required amendment of the restrictive covenant to enable the redevelopment of the site to proceed. Whilst the report to the Trust Committee had referred to an updated valuation and legal activities to resolve a boundary issue, no further details had been provided on the associated costs and who would be liable for them. It was pointed out the report had also failed to mention the value/level of receipt that the Trust may receive should the covenant be amended, which members were reminded had been put in place for good reason and with the full knowledge of the developer. The Committee was also reminded of the strong level of opposition from the local community to the lifting of the Covenant to which objections would also follow any submission made by the Trust to the Charity Commission for its amendment. Despite the public interest, it was felt members of the public were being kept in the dark and denied the right to speak at the Trust Meetings to express their views.

The Chair thanked Councillor Lorber for responding to the Committee's queries and advised that he had also accepted a further three requests to speak from members of the public and stakeholders in relation to the call-in. On this basis he then moved on to invite Gaynor Lloyd (as a local residents and supporter of the Friends of Barham Pak), to address the Committee with the following key issues highlighted.

Gaynor Lloyd began by highlighting the need to recognise Barham Park, its building and valuable covenants as assets that she reminded the Committee would require formal Charity Commission consent in terms of any changes being proposed to either the restrictive covenant or objectives of the Trust. The opportunity was also taken to remind the Committee of the obligations on its Trustees to comply with requirements of charity law and their fiduciary duties in relation to their role and decisions made by the Trust Committee. This included the need highlighted on the Charity Commission website for Trustees to show that they had based any decisions relating to the operation and management of the Trust on sufficient and relevant information, taking account of relevant impact and risks based on the provision of professional advice and consultation. In expanding on the establishment of the restrictive covenant relating to development of the site at 776 and 778 Harrow Road it was pointed out that the current developer was owned by the same person who also ran the funfairs in the Park with any amendment or removal of the covenant controversial. The original planning application on which negotiations to amend the covenant were ongoing in order to enable development to proceed, had attracted many objections with Charity Commission consent

requiring a professional valuation. It was highlighted that the recent report to the Trust Committee did not address the potential costs of hiring a specialist valuer or obtaining legal advice, nor did it clarify how the covenant would be changed. Once a valuation was secured, it would serve merely as a baseline for negotiations regarding an open market valuation. After all factors were disclosed to the public, it was felt these could then be set against the charity's considerations for the park and its beneficiaries. It was therefore felt that a further report was necessary to outline these considerations and clarify the basis on which any final decision was made by the Trustees.

The Chair thanked Gaynor Lloyd for her comments and attendance at the meeting and then invited Members to ask any questions they had in relation to the information presented, with the following issues raised.

- Members enquired whether it was felt all the necessary actions had been complied with by the Trust Committee in relation to the decision concerning the ongoing negotiations on the potential amendment of the restrictive covenant. Gaynor Lloyd responded that this was difficult to determine as reports to the Trust Committee since disposal of the site had only stated that negotiations were ongoing in respect of 776-778 Harrow Road and no detail (despite a Freedom of Information request) was available on any independent valuation.
- Following on from the previous question, views were sought in relation to the potential impact of the loss of Barham Community Library as part of the bronze development option being progressed under the Strategic Property Review. In response Gaynor Lloyd outlined her concern that the library did not appear to be included within the initial plans for the building presented to the Trust Committee for consideration in relation to the bronze option proposal, which (without any assurance having been provided) it was felt indicated when the lease expired in 2031, the library would close, leaving only three community based libraries operating across the borough and impacting on the existing and much valued community use of the building.

The Chair thanked Gaynor Lloyd for responding to the Committee's queries and then moved on to invite Mrs Keiko Taimuri (who had registered to speak on behalf of the Memory Lounge Dementia Group) to address the Committee, with the following issues raised.

Keiko Taimuri introduced herself as one of the beneficiaries of the support offered through the Memory Lounge and also one of its volunteers. The Committee were advised of the wide range of activities currently offered through the Memory Lounge including drawing, yoga, wellbeing talks, walks and meditation, some taking place twice a week and with over 80 attendees. As a volunteer, Keiko Taimuri advised that the Memory Lounge wished to continue offering good care to the community and individuals living with dementia for which the current space being provided within the Barham building with support from Friends of Barham Library remained crucial. Support was also expressed in seeking to resolve the position and finalise the lease enabling ongoing provision of the service within Unit 7.

The Chair thanked Keiko Taimuri for her comments and attendance at the meeting and then invited Members to ask any questions they had in relation to the information presented, with the following issues raised.

- In response to clarification being sought about the frequency at which activities took place within the Memory Lounge and repairs and improvements being sought to Unit 7 the Committee were advised that Memory Lounge would be able to take advantage of any additional space provided to extend the range of services available. This would include the provision of training and guidance to carers supporting people living with dementia.
- Details were sought on the number of people that benefitted from the service currently provided by Memory Lounge. Keiko Taimuri advised that regular attendance consisted of approx. 80 people with a waiting list for support given the service was oversubscribed. Further details were also provided on the range of specific activities provided with the importance of the Memory Lounge as a safe space for carers to look after people living with dementia being reiterated.
- In response to a query relating to funding and any alternative locations that may be able to support the service, should the existing unit not be available, Keiko Taimuri advised that the Lounge was supported in part by contributions made by users. In relation to alternative locations, it was felt that the Barham building remained the most appropriate location given the access to green and open spaces and the good transport links available.
- The Chair referenced earlier comments made about the need for additional space to provide a wider service to the community and praised the vital work being undertaken by the Memory Lounge to support those living with dementia and their carers in the local community. In terms of being able to utilise any additional space made available to expand their service, Keiko Taimuri advised that whilst requiring the necessary level of specialist trained staff the provision of additional space would be utilised and valued by those requiring access to support.

As there were no further questions from the Committee, the Chair then welcomed Mr Mahendra Desai (speaking on behalf of Mr Jagdish Patel who had requested to speak on behalf of the Barham Veterans Club) as the final speaker and invited him to address the Committee, with the following issues raised.

The Committee were advised that the Veterans' Club had been established in 1947 to tackle the issue of loneliness and isolation among elderly men. Whilst the Club had initially been supported through grants provided by the Council it was now financially self-sufficient and required to cover the cost of rent, utility bills and costs related to other activities with the Club providing a valuable local resource. The Veterans' Club had been disappointed that the Trust had failed to provide them with an opportunity to address the last Trust Committee meeting given concerns the Club had in relation to future development and use of the building and detrimental impact this may have on their ability to continue operating from that venue. Mahendra Desai expressed the hope that the club could continue to provide important services to help meet the Council's own objectives to tackle issues of loneliness and isolation among older people. In concluding his response, Mahendra

Desai urged the Committee to therefore refer the original decision taken by the Trust Committee back for reconsideration highlighting the need for further engagement and consultation and to recognise the potential impact on the future operation of the Club as a valued community resource.

The Chair thanked Mahendra Desai for his comments and attendance at the meeting and then invited Members to ask any questions they had in relation to the information presented, with the following issues raised.

- Further details were sought regarding the Club's view on the strategic and operational property decisions made by the Trust given their potential impact on their ongoing viability and ability to continue operating from that venue.. Whilst recognising and grateful for the support provided to date in providing a suitable space to run their activities, Mahendra Desai advised of the difficulty the organisation would have in being able to cover any increase in costs or rent meaning they would need to explore alternative funding sources in order to be able to continue operating. Despite these challenges, the Club continued to encourage elderly individuals to engage in their activities rather than remain at home, which would not be possible should the Club not be able to continue operating from its current location leading to a detrimental impact on those currently benefitting from the services and activities provided.
- Details were sought, if relocation was necessary, as to whether there was a suitable alternative local space that the club could use, either temporarily or on a more permanent basis. Mahendra Desai responded that the current space was well-liked. Most attendees travelled to the Club by walking or taking the bus making any alternative location more difficult to find.
- Members sought clarity on what time of the day the Club met with it confirmed it now operated from 11am to 6pm, six days a week and opened on more limited hours on a Sunday.

With no further issues raised, the Chair thanked Mahendra Desai for responding to the Committee's queries and then proceeded to invite Councillor Muhammed Butt as Chair of the Barham Park Trust Committee to respond to the issues raised within the call-in.

Councillor Muhammed Butt thanked the speakers for their contributions. In responding to the call-in and explaining the basis of the decisions made by the Barham Park Trust Committee, he felt it was important to begin by highlighting that the proposals presented for consideration in relation to the Strategic Property review had been designed as long-term options with the operational matters subsequently agreed following as a means of addressing current maintenance and management issues in relation to ongoing use of the building. For the avoidance of doubt, he assured the Committee there were no proposals to remove anyone from the building with the importance of looking after and maintaining the building emphasised. In reminding the Committee that the building and land original gifted to the Council had not been accompanied by any funding for its maintenance or management, members were advised this had required the Trust to invest income generated through rental receipts in order to maintain the estate with the Trust, it was felt, having been diligent in ensuring that the building and land were well looked after. In terms of the governance issues highlighted, confirmation was

provided that the Trustees had received the necessary training regarding their responsibilities with the decisions made by the Trust Committee, that were now subject to call-in, having been based on appropriate advice and designed to secure the long-term future of the building to ensure that Trust's obligations continued to be met.

Tanveer Ghani (Director of Property and Assets) was then invited to address the strategic element of the call-in. In terms of development of the proposals, members were advised of the delicate balance needing to be achieved between providing enough detail to engage interested parties and tenants and avoiding being overly prescriptive. Regarding the plans presented to the Trust Committee, these had contained detail on the proposed redistribution of community space that would now be able to support engagement and discussions with tenants moving forward as the next stage in the process.. This would, however, need to be undertaken on an individual basis, given each tenant was subject to their own distinctive lease arrangements with the outcome then used to begin the process of engagement with the Charity Commission on any potential amendment in the purposes of the Trust to support the possible incorporation of some level of commercial use to help cross subsidise the community elements. Highlighting the need to ensure an appropriate Asset Management Plan was in place, this had been the approach adopted by the Trust Committee. From an operational property matters perspective, the Committee was once again advised that the approach adopted had needed to reflect the individual circumstances of each of the existing tenants and units with the aim being to regularise and address decisions previously made by the Trust regarding the leases and recognising the Estates value as a local community asset and in order to sustain ongoing investment in the Park and Estate.

Having thanked Councillor Muhammed Butt and Tanveer Ghani for their initial response on the call-in the Chair then invited comments from the with the following points covered:

- A further explanation was sought from Councillor Muhammed Butt as Chair of the Trust Committee, as to why members of the public and tenant organisations were not given an opportunity to speak at the Barham Park Trust Committee meeting on 10 September 2024, despite the Charity Commission's guidance relating to engagement. In responding to the issues raised, Councillor Muhammed Butt emphasised that the aim of the decisions made was to ensure that meaningful engagement and consultations could be undertaken moving forward. Now that a way forward had been identified by the Trust Committee a process of discussion and engagement would commence with each individual tenant organisation in relation to the long-term plan. In response to further questioning, Councillor Muhammed Butt responded that the reports presented at the Barham Park Trust Committee meeting outlined the details and proposals for the building and park whilst also ensuring the necessary investments could be provided to maintain the building in order to secure its long-term future. Once again assurance was provided that within the process, the Trust would be engaging with each tenant on an individual basis so that personal conversations could be undertaken to address any specific concerns relating to their organisations circumstances.
- Members posed clarifying questions around whether it was the current intention for the library and other community groups currently operating as

tenants to continue doing so from 2031 onwards, or if the proposed bronze model would end their tenancies. Councillor Muhammed Butt as Chair of the Trust Committee clarified that the Trust would be engaging with existing tenants in order to understand their needs and how improvements could be made in relation to future use and maintenance of the building which, the Committee were advised, would not exclude current tenants. In terms of the Library it was confirmed their current lease would not expire until 2031. Following on from Councillor Muhammed Butt's response, Tanveer Ghani (Director of Property and Assets) added that in the longer term, the refurbishment plans would be reflective of the engagement that had been conducted with the tenants with the final proposals and make up/use of the building subject to the outcome of the engagement process and approval being obtained from the Charity Commission regarding any associated change required in the Trust's charitable purpose.

- As a further issue, details were also sought as to how this process would reflect and link with consideration of the social value element included within the Council's Property Strategy and members keen to explore how the value of an asset such as the library or other community use would be assessed in relation to their social as well as financial impact. In recognising the issues highlighted, Councillor Muhammed Butt felt it was important to consider what value any operator or tenant brought to any asset or space, with it noted that the Council's Property Strategy related to assets held by the Council which were distinctly separate from those held by the Trust. In relation to the Barham Park buildings and park, the Trust would need to consider the existing uses within the building and wider value provided when evaluating any options and requirements moving forward.
- In addition to the planned engagement and consultation process with existing tenants, members queried what, if any, further consultation was planned on the strategic property option and whether this would include local ward councillors as well as the local community. In response, Tanveer Ghani (Director of Property and Assets) advised that the starting point of consultation would be engagement with existing tenants who would be most impacted by the proposals. Public consultation would depend on whether a planning application might be necessary and on pre-planning engagement with residents and members. Any wider public consultation would not take place until there was certainty about the feasibility of the bronze option or any variations of it, particularly in relation to initial engagement with the tenants. Councillor Muhammed Butt as Chair of the Trust Committee added that trustees had an obligation to ensure that they were working within the constraints of what was permitted, in line with Charity Commission guidance. Advice was always sought from officers and the Charity Commission on what would be necessary and acceptable moving forward. This raised related questions about how essential it was to seek Charity Commission approval for any change in the Trust's charitable purpose to allow wider commercial use of the building with the Committee advised that this related to the ability of the Trust to generate income from the estate to support its ongoing use. Whilst social value remained an important consideration there was also a need to ensure a sufficient yield was generated to sustain and improve the building with Tanveer Ghani advising that one of the reasons the gold and silver options had been rejected from the original strategy property review options

was that they essentially involved commercial takeovers of the estate, necessitating significantly greater investment and commercial rent to make the overall investment plan feasible. In contrast, the bronze option proposed a smaller amount of commercial activity to provide a cross-subsidy for the long-term maintenance of the Trust's charitable purposes. As a further query regarding consultation, members were keen to explore whether discussions would include representatives of each tenant's management body or wider membership and interested community groups, such as the Friends of Barham Park. In response, Tanveer Ghani advised that the starting point for consultation would be with management representatives and individuals who were dealt with on a landlord / tenancy basis, but this would not prevent those organisations engaging with their members to ensure their views were also feedback as part of the engagement process.

- Having noted the concerns expressed within the call-in regarding the proposed changes in delegation of powers to Council officers acting on behalf of the Trust, assurance was sought that the Trust Committee retained confidence in the advice and exercising of these delegated powers to date, which Councillor Muhammed Butt confirmed. Highlighting reference within the call-in to concerns regarding performance in relation to rent collection, the conducting of rent reviews and application of service charges to tenant organisations further clarification was sought on the background given the potential impact on income being generated to support the Trust and maintenance of the Estate. Whilst recognising the issues highlighted, Tanveer Ghani supported by Denish Patel (Head of Property) felt it important to outline the work being undertaken to improve performance in relation to the collection of rent and clearance of outstanding arrears in partnership with the relevant tenant organisations. In terms of current arrears, it was acknowledged that dialogue with tenants did not always result in the desired outcomes and in these instances the Trust would need to rely on legal powers to support the work being undertaken in as efficient a way as possible.. It was noted that during the height of the pandemic rent arrears had accrued, and since then officers had been working hard to support tenant organisations in seeking to sustain tenancies over the long term, balanced against the desire to provide them with the opportunity to financially recover and clear any arrears. In terms of service charges, it was acknowledged that historically these had not been applied with the aim moving forward to rectify this in order to support ongoing maintenance and improvement works required. If the Trust was to continue receiving support in delivering its charitable objectives, a balance needed to be struck between income and social value. The operational property matters report dealt with the present while the strategic property matters report concentrated focus on the long-term sustainability of the estate and effective estate management requiring both an operational and strategic approach. Councillor Muhammed Butt referenced earlier comments made by the Veterans' Club regarding how they had currently reached the maximum amount they could afford and explained that if rent increases were necessary, discussions would need to take place with each tenant to ensure they understood the implications. Denish Patel (Head of Property) noted that rent increases would be implemented from April 2025 in a gradual and fair way to enable sustainability in tenancies and allow for tenants to be able to adapt to the changes.

- In terms of the longer-term plan to address and enhance performance Tanveer Ghani (Director of Property and Assets) advised that there was a detailed plan in place to address the matters raised. This included the need to progress urgent building repairs, address the status of leases held by tenants and the vacant units within the building (including the undertaking of outstanding rent reviews and implementation of service charges), complete negotiations relating to the restrictive covenant and commence a process of engagement with tenants on the longer term proposals in advance of seeking an approvals required from the Charity Commission to progress the longer-term plan.
- Returning to the issue of rent arrears, members again queried performance on the clearance of rent arrears and pointed out that in the 2022-23 financial year, the arrears totalled £39,500. Having been advised that the aim was to clear these by the end of the 2024-24 financial year the Committee noted this had not been achieved prompting questions around the reasons for this. Denish Patel (Head of Property) clarified that this partly related to the issue of backdated rent reviews which had been undertaken earlier in the year with the current level of arrears reflecting the outcome of that process and progress continuing to be made in seeking to clear debts in an ethical and supported way to sustain tenancies.
- As a follow up issue, further details were also sought on the reasons for service charges not having been consistently applied which Denish Patel (Head of Property) advised reflected the approach adopted in seeking to balance income against social value. Whilst the Trust remained committed to supporting community organisations the need to adjust this approach had now been identified to reflect the current costs involved in maintenance and upkeep of the Estate.
- In response to a query regarding the costs associated in seeking to remove the restrictive covenant on the site at 776 and 778 Harrow Road, Denish Patel advised that main costs would include the legal fees for preparing the deed, the costs of an updated valuation, and the time officers spent obtaining any required approvals.
- Members observed that the costs of maintaining the park had been rising each year. For the past six years, the park's income had remained stagnant at around £100,000, raising questions around future plans regarding market or affordable rent and the ultimate goal for community benefit. The Committee were advised that the ultimate aim for community benefit was to ensure the estate's sustainability and provide high-quality accommodation for tenants, some of whom would be involved in delivering community services while others would be able to offer commercial and retail services, subject to Charity Commission approval. It was therefore crucial that the estate was self-sufficient and did not require funding from other sources to run the operations as a sustainable venture. In relation to the strategic property options presented to the Trust Committee it was pointed out that the gold and silver options which had been rejected would have required consideration of open market rents and converting the building into a commercial space, which did not align with the Trust's objectives. Whilst progressing the bronze option

would require discussions with the Charity Commission around the possibility of incorporating partial commercial use within the building along with the provision of a Business Case and Investment Strategy to establish the ability to fund the refurbishment proposal, it was once again highlighted that the final design would need to reflect the outcome of the engagement process shortly due to commence regarding future use of the building including the need to ensure the estate remained as accessible as possible.

- Returning to the issue of consultation, members asked whether only those who used the Barham Park facilities would be consulted, or if the consultation would also include individuals who might not feel the park was meant for them. Officers responded that the priority issues concerned the building estate, the tenants, and units with that identified as an initial focus for the engagement process. Following up, views were also sought on whether any consideration had been given to whether the building was in fact felt to be worth preserving or would pose a substantial burden that obstructed progress. Officers responded that, although there were challenges given the current condition of the building, it was essential to tackle strategic operational issues, lease renewals, and landlord responsibilities that the Trust needed to uphold. The importance in making the building accessible to the wider community was also emphasised. It was further explained that part of the request to the Charity Commission to expand its use was aimed at encouraging broader engagement, attracting more members of the public to enjoy both the building and the park and reflecting its current level of use as a valued community asset.
- In response to Committee questions around the financial investment required to progress the proposals and associated risks in seeking to pursue the options in advance of the development of a Business Plan and any necessary Charity Commission approval, Members were advised that the work undertaken by architects had helped to articulate what was possible across the three different options which had initially been presented to the Trust Committee. In terms of the investment plan, there was a sufficient level of detail to provide an outline of initial cost proposals with the bronze option assessed as requiring investment of approximately £1.7m based on current market conditions, which would primarily need to be funded through capital borrowing. This did not, however, rule out the possibility of exploring other grant opportunities or Strategic Community Infrastructure Levy (SCIL) funding in future. The work required to prepare an appropriate Investment Strategy and Business Plan would need to reflect development of the design proposals which the decisions taken by the Trust Committee had been designed to ensure could now be taken forward.
- Following on from the previous question, details were sought on whether climate change implications had also been considered in design of the proposed options considered by the Trust Committee, including retrofitting and energy supply sources as the report had indicated there were none. Members were advised that at this stage in their development detailed considerations relating to what materials would be used or what features could be included in the fixed design process had not yet been undertaken, which would dictate opportunities for retrofitting, carbon emissions, and achieving net zero. Officers would explore potential climate change mitigation strategies as part of

the long-term investment plan, focusing on options that provided the best value for money with the next phase in their development and procurement of the appropriate design team following on from an assessment of the outcome from the engagement and consultation process.

- In terms of progressing the proposals, views were also sought as to how confident the Trust remained on the ability to secure any necessary approvals from the Charity Commission. Tanveer Ghani (Director of Property and Assets) responded that the current proposals were centred around maintaining the current charitable purposes of the estate, and whilst officers were confident in being able to present a compelling case, it was recognised that the final decision would remain outside of their control.
- Returning to the issue of engagement, further assurance was sought by the Committee in relation to the commitment to actively engage with current tenants prior to the proposals being progressed any further. In response, Councillor Muhammed Butt re-iterated that the starting point of consultation would be with existing tenants with the Trust (subject to the outcome of the call-in) having granted officers permission to initiate the consultative process, which would commence once the call-in process had been completed. Following the outcome of the call-in, next steps would be evaluated with an outline of proposed timescales having been outlined within the original report presented to the Trust Committee in September.
- In response to clarification being sought regarding the potential clawback of any Sure Start grant funding Denish Patel (Head of Property) confirmed that as this related to services commissioned by Brent Council and not directly by the Trust it would be the Council who would be responsible for addressing any clawback provisions under the funding arrangement should the lease on Unit 8 not be renewed prior to the end of the existing grant agreement.
- Clarification was also sought regarding the position of the lease for Unit 7, with members noting its original intended use as a dementia advice and outreach service. Officers responded that potential leasing arrangements would be discussed with Friends of Barham Library who had managed the original process with the Trust keen to bring Unit 7 back into use. Highlighting the impact of the delay in the position being addressed in terms of potential access to the Unit by an important local service and on the income position of the Trust, members were keen to explore the basis of the delay which officers explained had related to the need identified for development of a strategic plan that would clarify the long-term vision for the estate. Now that this plan was in place, meaningful discussions could begin in collaboration with the Memory Lounge regarding the leasing of Unit 7.
- As a final issue, reference was made to the concerns highlighted within the call-in relating to the governance arrangements for the Trust with assurance provided that these arrangements were subject to regular and ongoing review by Trustees in order to assess and ensure they continued to provide the most appropriate model.

As no further comments were raised, the Chair thanked everyone for their contributions to the discussion.

Having considered the grounds for the call-in and response provided at the meeting in outlining the basis for the decisions which had been taken by the Barham Park Trust Committee a majority of members on the Committee, in summing up and having considered the options available under the call-process, indicated they were minded to confirm rather than refer back the original decisions taken by the Barham Park Trust Committee in relation to both the strategic property and operational property matters.

Having noted the comments from the one member who voted against confirming the decision and in favour of referring the decisions back to the Trust Committee for reconsideration on the basis it was not felt the issues raised under the call-on had been adequately addressed the Committee **RESOLVED** as a final outcome of the call-in to confirm the original decision made by the Barham Park Trust on 10 September 2024 to agree the decisions relations to strategic property matters and operational property matters with it noted that the decision would therefore take immediate effect following the meeting.


4. **Any other urgent business**

No items of urgent business were identified.

The meeting closed at 8.00 pm

COUNCILLOR DANIEL KENNELLY
Vice-Chair in the Chair

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 Brent	Resources and Public Realm Scrutiny Committee 5 November 2024
	Report from the Director of Inclusive Regeneration and Employment
	Lead Member(s) - Cabinet for Regeneration, Planning & Growth (Councillor Shama Tatler) Cabinet Member for Environment and Enforcement (Councillor Krupa Sheth)
Findings of the Local Government Ombudsman regarding a failure to attach a condition to a 2012 planning consent	

Wards Affected:	Kingsbury
Key or Non-Key Decision:	Not Applicable
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	Two Appendix 1: Local Government Ombudsman decision Appendix 2: DM Process flow chart
Background Papers:	None
Contact Officer(s):	David Glover Head of Planning and Development Services E-mail: David.glover@brent.gov.uk

1.0 Executive Summary

- 1.1 Planning permission was granted in May 2012 for the change of use of a site in Kingsbury Road to tyre fitting, storage and car wash. Within the planning report it stated that a condition requiring the turning area to be kept clear was necessary, however this condition did not get put on to the decision letter. A complaint was subsequently received highlighting that vehicles were reversing down the access road to Kingsbury Road because the area supposed to be used for turning was not being kept clear.

- 1.2 Last year the Local Government Ombudsman found fault in the way that the Council dealt with this planning application back in 2012 and recommended that actions were undertaken to ensure that this is less likely to happen again. This comprised an a) apology to the complainant for the disappointment and frustration caused by the fault; b) a review of the council's practices and procedures; and c) the consideration of whether the council has any power to require safe vehicular access to and from the site. The Ombudsman has recommended that the outcomes are reported to the relevant council oversight and scrutiny committee in relation to actions a) an apology to the complainant; and b) a review of the Council's procedures and practices.
- 1.3 These steps have been carried out. A formal apology was sent to the complainant on 4th January 2024 and the Council's procedures have been updated to include specific references to the need to ensure that all relevant and necessary conditions are attached. This report examines the process and procedures that were in place at the time of the decision and examines the Council's current procedures and identifies improvements to minimise the risk of future error or oversight.

2.0 Recommendation(s)

2.1 That Scrutiny note

2.1.1. The findings of the Ombudsman.

2.1.2 That all actions that were recommended by the Ombudsman have been carried out and there are no further specific recommendations.

3.0 Detail

3.1 Contribution to Borough Plan Priorities & Strategic Context

3.1.1 Planning decisions contribute to a number of Brent's Borough Plan Priorities, with the decision on the 2012 planning application specifically contributing to:

- Prosperity and Stability in Brent – in relation to the need to support businesses to ensure that they can thrive.
- A cleaner, greener future – in relation to the objective to keep Brent on the move;

3.2 Background

3.2.1 Planning permission was granted on 10 May 2012 for the change of use of a property adjacent to the complainant's business premises to tyre fitting, storage and car wash. The safe movement of vehicles within the site was evaluated. It was set out within the officers report for the application that a condition should be attached to the consent which requires the turning area to be kept clear in order to allow vehicles to turn within the site and therefore enter and exit in a forward direction. However, a condition was not attached to the planning permission which required the area to be kept clear.

3.2.2 A complaint was received which highlighted that this area was not being kept clear and because of this, vehicles were leaving the site by reversing down a long access to the public highway. The complainant highlighted that this was dangerous and not what the case officer had intended when they wrote their report.

3.3.3 The Local Government found fault in the way that the Council dealt with this application in the omission of the condition. The following was set out in the decision of the Ombudsman:

21 *In their report, the case officer said an area should be kept clear to allow vehicles to enter and leave the site in a forward gear, but the Council did not require this. There was an intention to assert planning control, but this did not happen. This is fault.*

22. *When we find fault, we need to decide whether an injustice was caused to the individual who complained to us. We also need to decide whether further action is needed to avoid the same fault happening again in the future.*

23. *From my discussion with X and reading their emails and letters, it is clear they are disappointed and frustrated by what has happened. The Council should apologise for the fault I have found.*

24. *A condition requiring a turning area was for maintaining safe public access to and from the site. It was not intended to benefit X as an individual business operator. Because of this, I will not recommend any personal remedy beyond an apology.*

25. *However, the fault I have found might happen again. I will ask the Council to review its practice and process in light of this complaint and make any changes that are necessary.*

3.3.4 Three actions were recommended by the Ombudsman in relation to this fault. This comprised an a) apology to the complainant for the disappointment and frustration caused by the fault; b) a review of the council's practices and procedures; and c) the consideration of whether the council has any power to require safe vehicular access to and from the site. The Ombudsman recommended that the outcomes in relation to actions a) and b) to the relevant council oversight and scrutiny committee. These recommendations have been implemented.

3.3.5 This report focuses on the review of the council's practices and procedures as the Council's constitution states that "*the terms of reference of the scrutiny committees exclude matters concerning individual applications for consent, permission, approval, registration or grants. Examples include but are not limited to individual planning and licensing decisions*"

3.3.6 The decision which was made in May 2012. At this time, the Council had processes in place relating to the checking of reports, recommendations and

conditions. Checklists were produced for the files (which were in hard copy) covering a range of quality assurance control. However, while some process notes were available for officers, the Planning Service did not have an end-to-end process manual and the processes weren't as accessible as they would ideally be.

- 3.3.7 With regard to the decision making process, the 2012 application was checked by the Area Manager and determined by the Head of Area Planning (positions now known as the Development Management Area Manager and Development Management Service Manager). Robust measures were therefore in place to ensure that the reports and recommendations are checked. However, no guidance was in place for decision makers other than the general quality control checklists.
- 3.3.8 In the 12 years since this decision was made, the Development Management service has been through several audits. This included two Brent Council Internal Audits which were carried out by the Council's audit team in 2016 and 2021, independent of the Planning Service. The Local Government Association also carried out a Planning Improvement Peer Challenge in 2016. While no issues were raised regarding the processes that were place in relation to conditions, these audits together with other internal improvement projects have resulted in the introduction of quality control mechanisms built into its practices and systems to minimise the chances of error or oversight. This includes mechanisms to prevent certain documents being produced (e.g. draft decision notices) if key actions have not been undertaken. It also includes warnings that appear on the system under pre-defined situations (e.g. if the number of objections exceeds the threshold for planning committee but a delegated decision type has been selected, or if the consultation end date has not yet been reached). Further to this, a number of intranet based quality control webpages were established to allow issues to be identified.
- 3.3.9 It is set out in government guidance that planning conditions must meet specific legal tests and be necessary, relevant to planning, relevant to the proposed development, enforceable, precise and reasonable. Because of this, conditions will vary from one consent to another. However, certain application types were identified where the suite of conditions that were applicable to all decisions for certain application types and our system was updated to automate the addition of these conditions. However, this approach could not be taken for all conditions and process manuals play a key role in ensuring that all necessary actions are undertaken by both the case officer and the decision maker.
- 3.3.10 A detailed end-to-end procedure manual was produced in 2021 alongside process flow charts to replace the checklists that were previously used. These provide both structured information to ensure thorough and consistent training and also act as reference guides to ensure that the policies and procedures are followed. This manual has been updated over time to reflect necessary changes and improvements to policies and procedures.
- 3.3.11 Following the receipt of the ombudsman's decision, these processes and procedures were reviewed by Planning Management, and the processes were

updated to include further information and reminders regarding the requirements for planning conditions and reasons for refusal. A two step process is already in place to ensure that all reports, recommendations and conditions / reasons for refusal are checked by a person with appropriate delegated authority, with IT system controls in place to ensure that this happens.

3.3.12 It was considered that the overall process is robust with appropriate checks in place to minimise the risk of error. This is also evidenced by the very small number of issues that have resulted from the Council's planning decisions (with between 4,500 and 5,500 planning decisions made each year). Nevertheless, the inclusion of further reminders at key stages of the process was considered to be a valuable addition.

3.3.13 Following the review, it was considered that the Council's policies and procedures are considerably stronger than they were in 2012, with additional resources available to officers and a greater number of quality control mechanisms. It was considered beneficial to add additional information to the process guides and this was undertaken following the review. The DM Process flow chart has been appended to this report which forms a part of the full manual and provides an overview of the process.

4.0 Stakeholder and ward member consultation and engagement

4.1 No consultation or engagement is required in relation to the Ombudsman decision.

5.0 Financial Considerations

5.1 None.

6.0 Legal Considerations

6.1 None.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

7.1 No specific equalities, diversity or inclusion considerations have been raised in association with the Ombudsman decision.

8.0 Climate Change and Environmental Considerations

8.1 There are no climate change or environmental considerations associated with this Ombudsman decision.

9.0 Human Resources/Property Considerations

9.1 There are no human resources or property considerations associated with this Ombudsman decision.

10.0 Communication Considerations

10.1 There are no communications considerations associated with this Ombudsman decision.

Report sign off:

Gerry Ansell
Director of Inclusive Regeneration and
Employment

The Ombudsman's final decision

Summary: X complained about the Council's failure to take planning enforcement action against a business that operates near the business X operates. We found fault that the Council has agreed to take action to reduce the likelihood of it to happening again.

The complaint

1. The person that complained to us will be referred to as X. X runs a business and complained to the Council about another business that operates from an adjacent premises.
2. X complained that the Council failed to take planning enforcement action against the other business, which:
 - did not keep a turning area clear as was shown on an approved plan, so vehicles were reversing from the site onto the highway; and
 - operated out of hours agreed in a planning condition.

The Ombudsman's role and powers

3. We investigate complaints about 'maladministration' and 'service failure'. In this statement, I have used the word fault to refer to these. We must also consider whether any fault has had an adverse impact on the person making the complaint. I refer to this as 'injustice'. If there has been fault which has caused significant injustice, or that could cause injustice to others in the future we may suggest a remedy. (Local Government Act 1974, sections 26(1) and 26A(1), as amended)
4. If we are satisfied with an organisation's actions or proposed actions, we can complete our investigation and issue a decision statement. (Local Government Act 1974, section 30(1B) and 34H(i), as amended)

How I considered this complaint

5. I read the complaint and discussed it with X. I read the Council's response to the complaint and considered documents from its planning files, including the plans and the case officer's report.
6. I gave the Council and X an opportunity to comment on a draft of this decision and I took account of the comments I received.

What I found

Planning law and guidance

7. Councils should approve planning applications that accord with policies in the local development plan, unless other material planning considerations indicate they should not.
8. Planning considerations include things like:
 - access to the highway;
 - protection of ecological and heritage assets; and
 - the impact on neighbouring amenity.
9. Planning considerations do not include things like:
 - views over another's land;
 - the impact of development on property value; and
 - private rights and interests in land.
10. Councils may impose planning conditions to make development acceptable in planning terms. Conditions should be necessary, enforceable and reasonable in all other regards.
11. Planning enforcement is discretionary and formal action should happen only when it would be a proportionate response to the breach. When deciding whether to enforce, councils should consider the likely impact of harm to the public and whether they might grant approval if they were to receive an application for the development or use.

What happened

12. X complained to the Council about the business that operated on the site next to their own. X said the business was operating outside hours agreed in a planning condition, and that an area shown on approved plans for turning was not kept clear.
13. X referred to the case officer report which was written before planning permission was granted. It said the hardstanding area around the site should be kept clear to allow vehicles to turn and leave in a forward gear. The plan shows other areas marked for parking and storage, but the turning area is being used for these purposes. X said that because of this, vehicles leave the site by reversing down a long access track onto the public highway. X said this was clearly dangerous and not what the case officer intended when they wrote their report.
14. The Council responded to X's complaint, and said:
 - it could not insist the business kept the turning area clear, because it did not have a condition requiring this; and
 - it would not enforce the hours of operation condition, because there were no recent complaints from nearby residents.
15. X was unhappy with the Council's response, so complained to us.
16. During my investigation, the Council expressed some uncertainty that a condition to require a turning area was enforceable. I checked the Council's website and found other approvals where conditions requiring turning areas and parking spaces to be marked out and kept clear, were imposed.

My findings

17. We are not a planning appeal body. Our role is to review the process by which planning decisions are made. We look for evidence of fault causing a significant injustice to the individual complainant.

Hours of operation

18. The Council imposed a condition, the purpose of which was to protect the amenities of residents.
19. X complained the condition was breached, but the Council decided not to enforce because X runs a business next to the site but does not live nearby. Though there are houses nearby, no residents had complained to the Council.
20. This was a judgement the Council was entitled to make, and we will not criticise unless we find evidence of fault in the decision making process. Before it made its decision the Council considered the condition, its enforcement powers and the extent to which the breach caused harm. This is the decision making process we expect and so I find no fault.

Vehicle turning area

21. In their report, the case officer said an area should be kept clear to allow vehicles to enter and leave the site in a forward gear, but the Council did not require this. There was an intention to assert planning control, but this did not happen. This is fault.
22. When we find fault, we need to decide whether an injustice was caused to the individual who complained to us. We also need to decide whether further action is needed to avoid the same fault happening again in the future.
23. From my discussion with X and reading their emails and letters, it is clear they are disappointed and frustrated by what has happened. The Council should apologise for the fault I have found.
24. A condition requiring a turning area was for maintaining safe public access to and from the site. It was not intended to benefit X as an individual business operator. Because of this, I will not recommend any personal remedy beyond an apology.
25. However, the fault I have found might happen again. I will ask the Council to review its practice and process in light of this complaint and make any changes that are necessary.

Agreed action

26. The Council agreed to carry out the following actions, which may make the fault I found less likely to happen again. The Council will:
 - a) apologise to X for the disappointment and frustration caused by the fault I have found. This will happen within four weeks from the date of this decision.
 - b) carry out a review of its practice and procedure to ensure it imposes the planning conditions it intends to. It will also ensure that the conditions it uses are enforceable, necessary and fit for purpose. This will happen within three months from the date of our final decision.
 - c) consider whether it has any power it has and should use to require safe vehicular access to and from the site. This will happen within three months from the date of our final decision.
27. The Council will report the outcomes of the actions in paragraphs 26 (a) and (b) above to its relevant oversight and scrutiny committee(s).

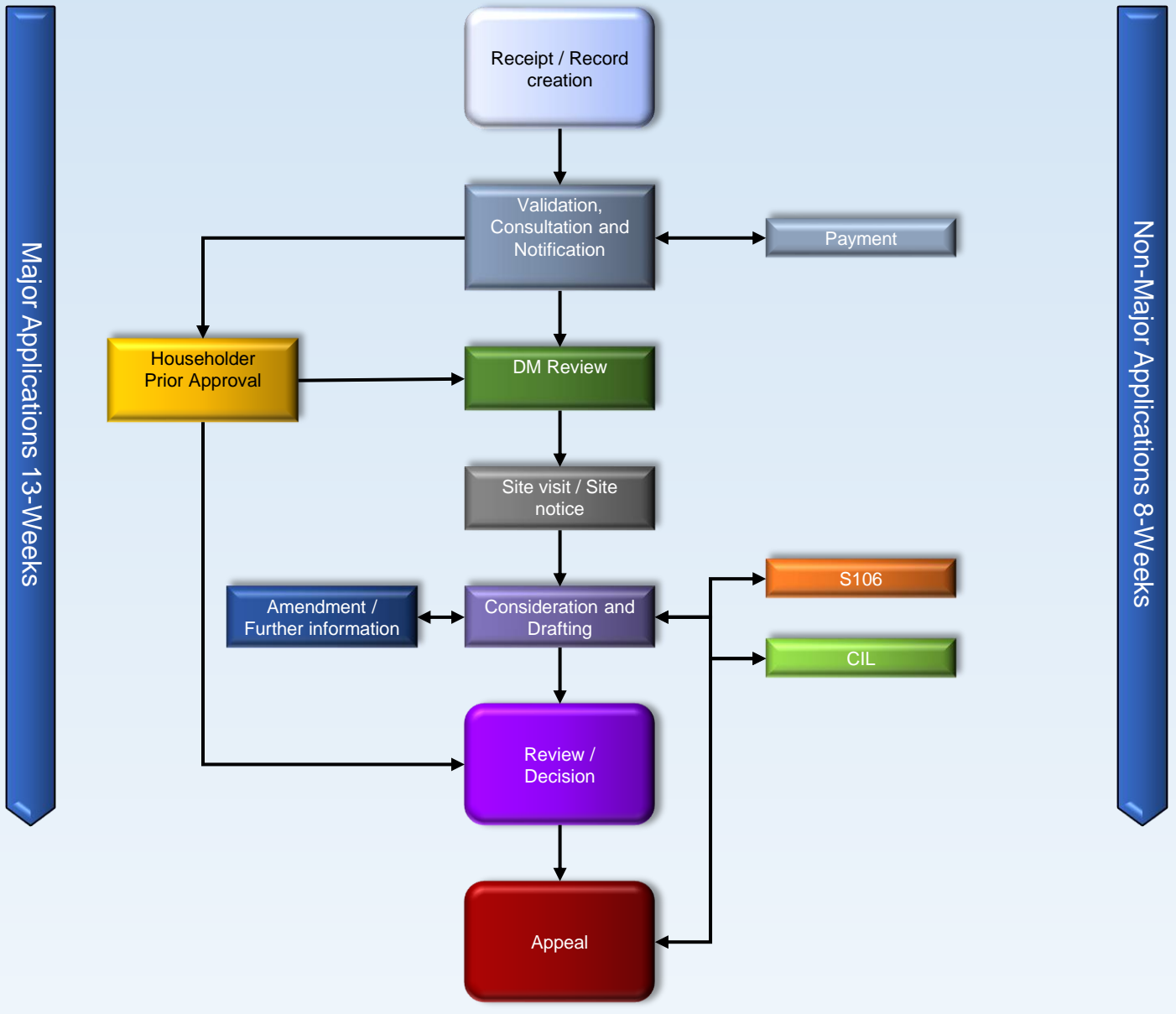
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28. The Council will provide us with evidence it has complied with all the above actions.

Final decision

29. I found fault causing injustice which might recur. I completed my investigation because the Council agreed to my recommendations.

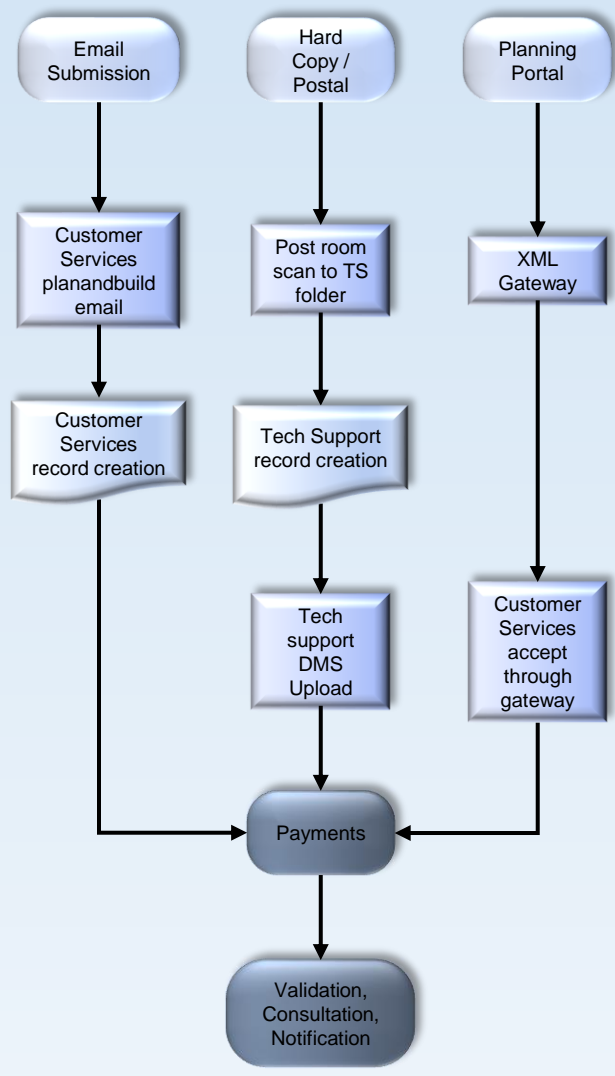
Investigator's decision on behalf of the Ombudsman

DM Process Overview



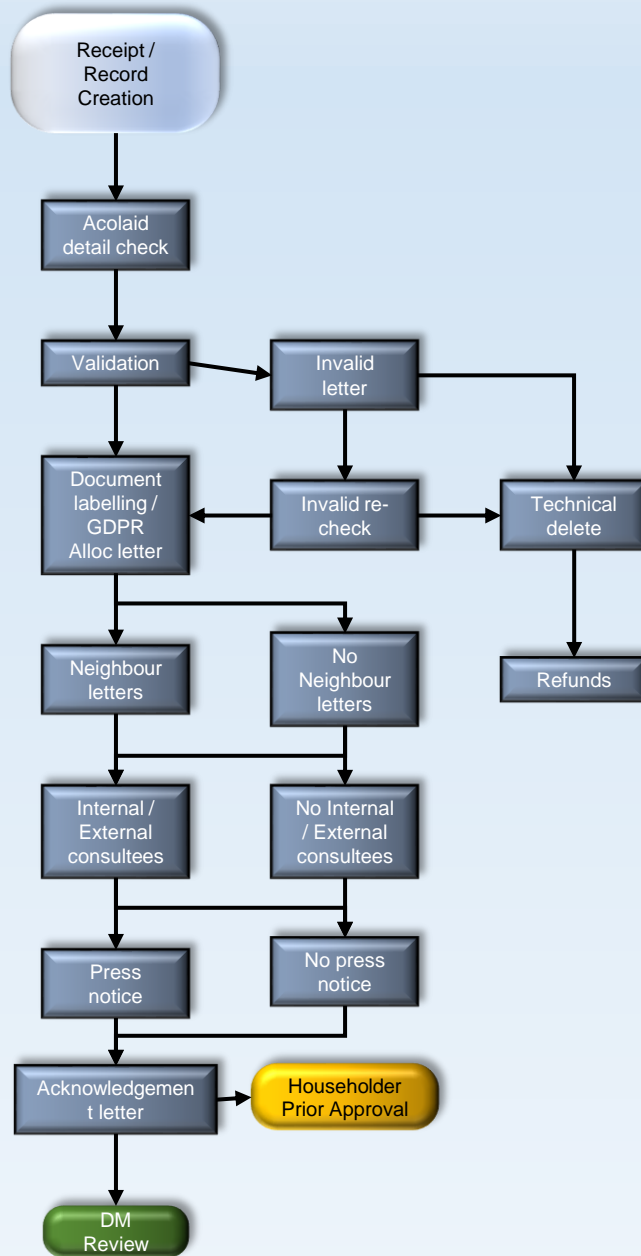
Receipt / Record Creation

Major Applications Week 1 / Non-Major Applications Week 1



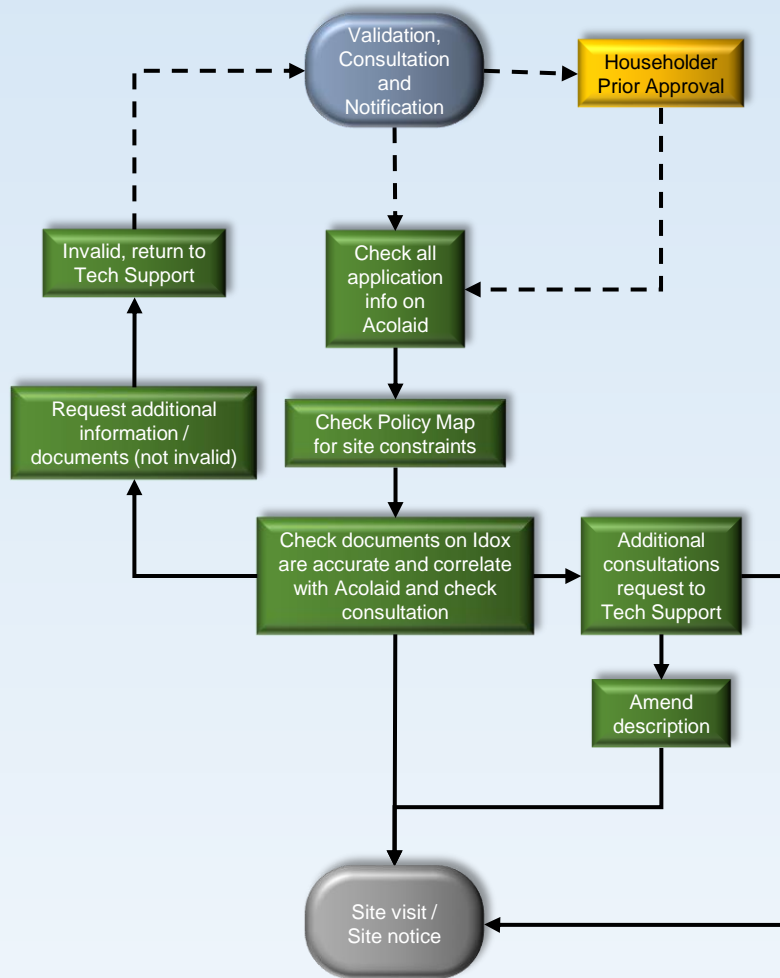
Validation, Consultation and Notification

Major Applications Week 1 / Non-Major Applications Week 1



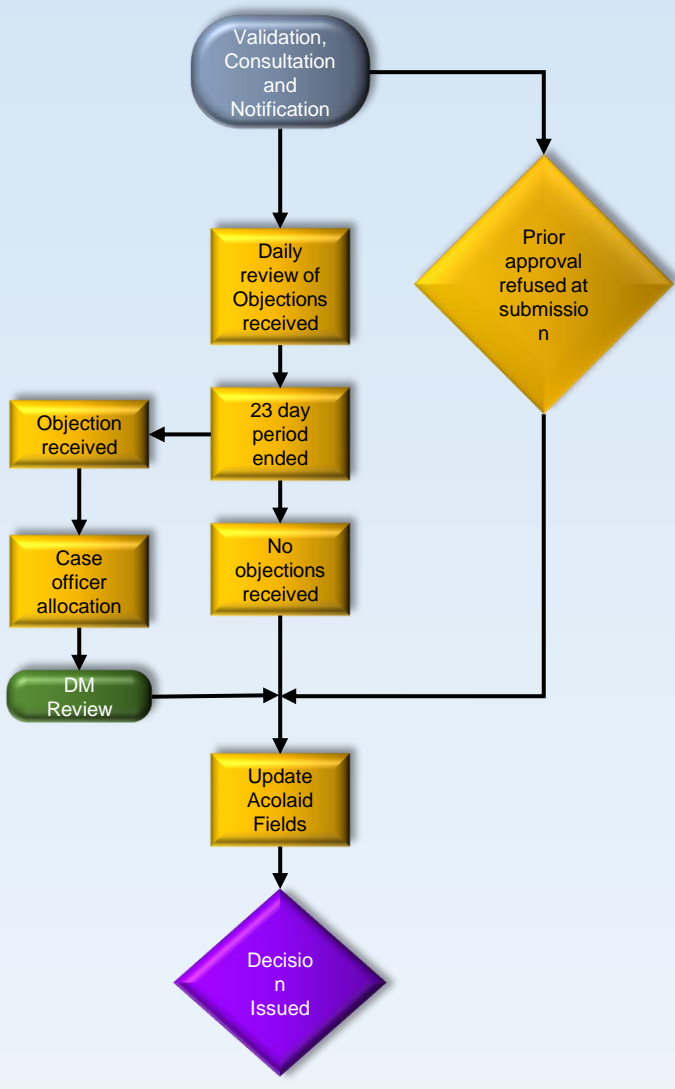
DM Review

Major Applications Week 2 / Non-Major Applications Week 2



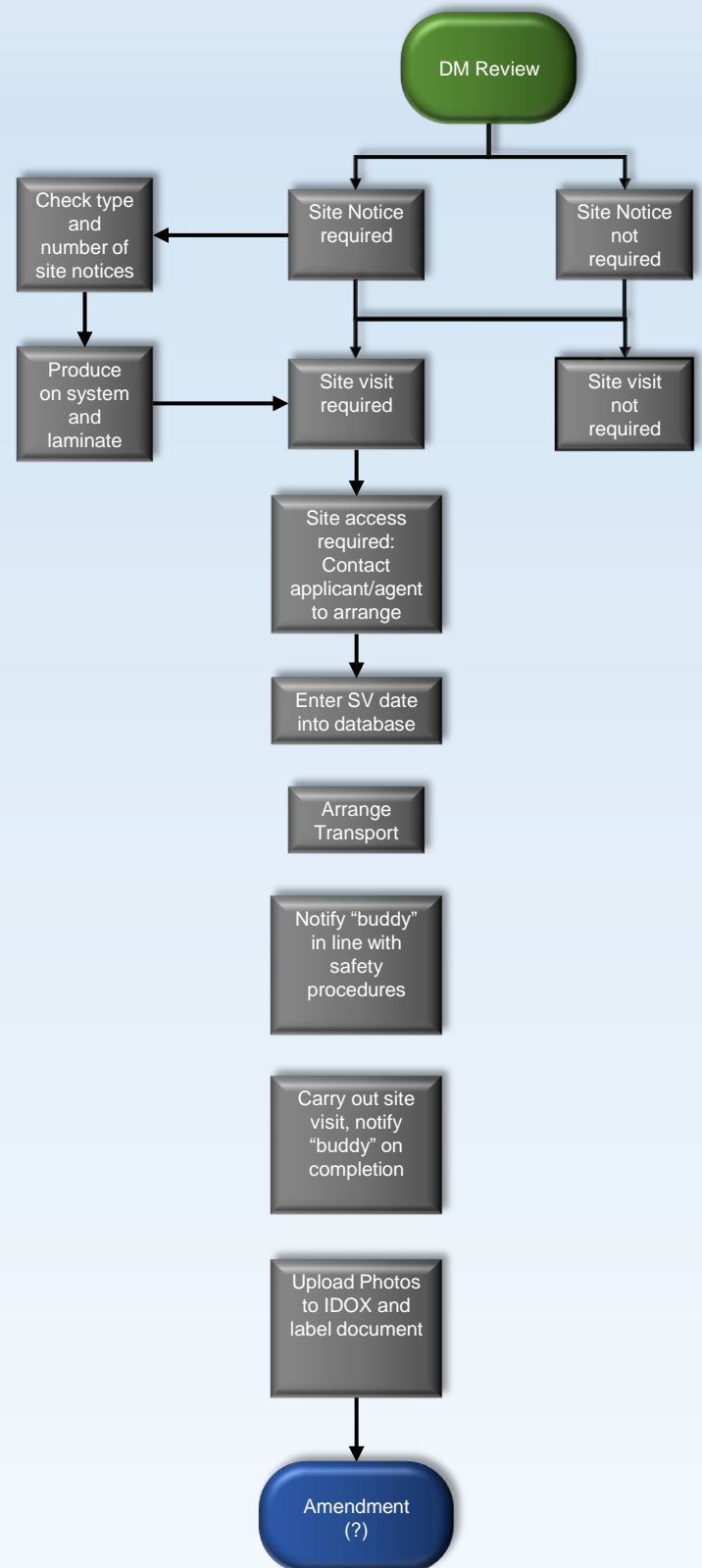
Householder Prior Approval

Non-Major Applications Weeks 2-7



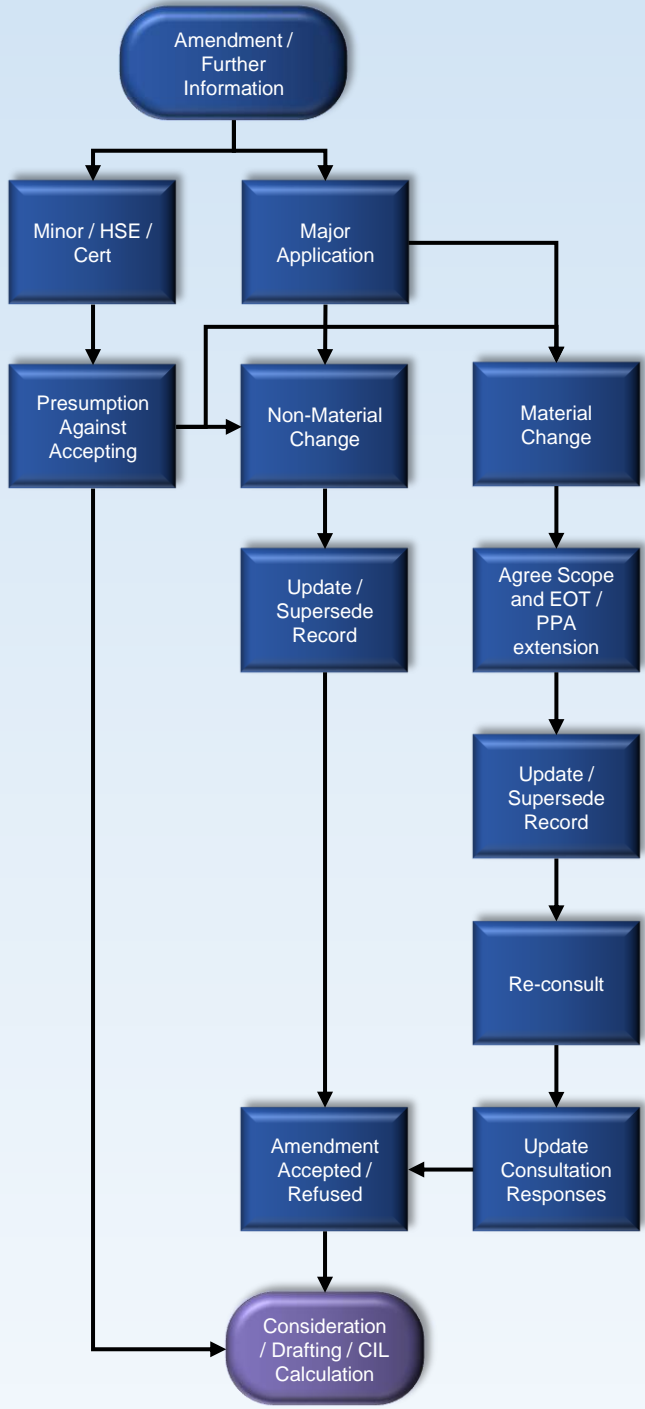
Site Visit / Site Notice

Major Applications Week 3 / Non-Major Applications Week 3



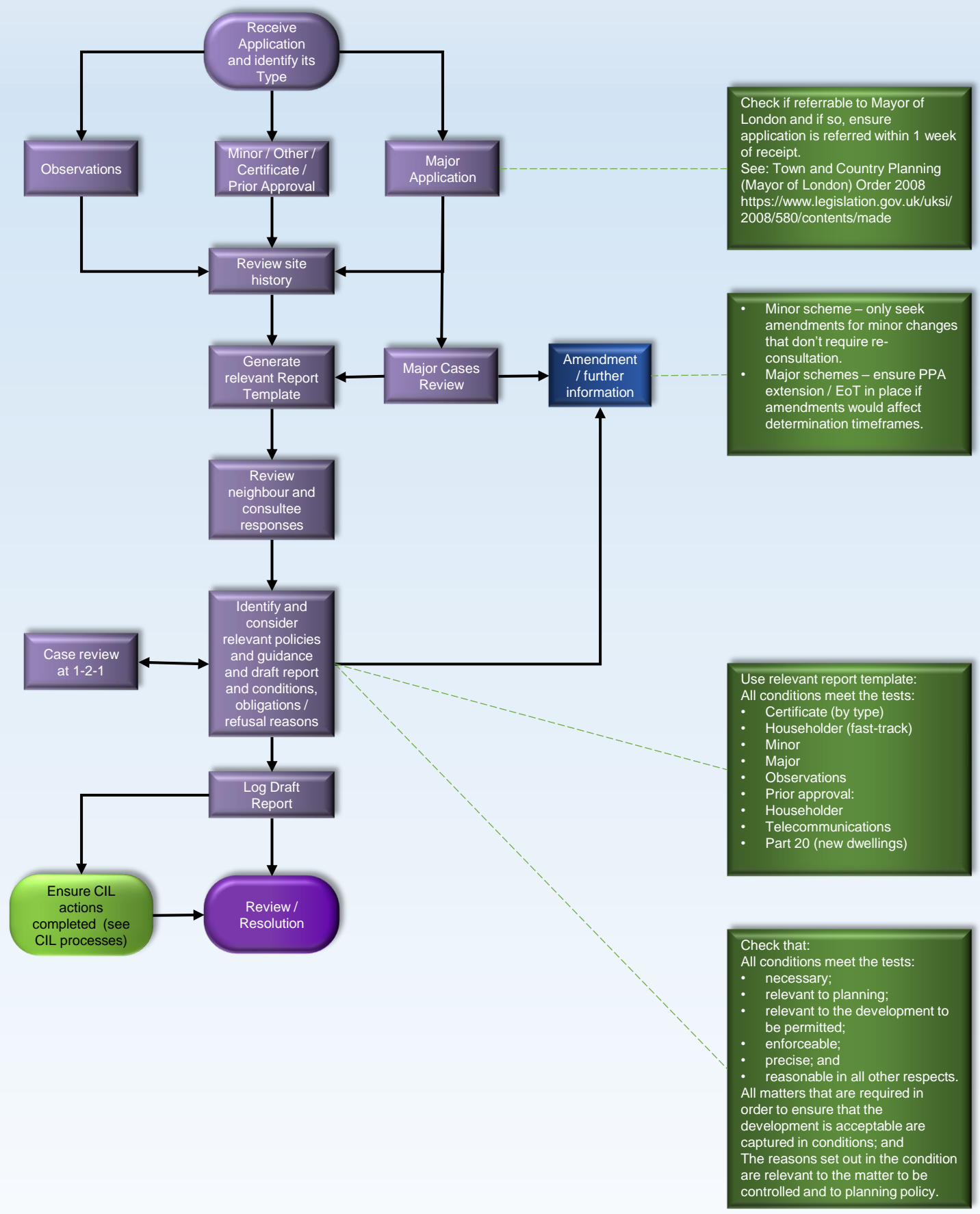
Amendment / Further Information

Major Applications Week 3 / Non-Major Applications Week 3



Consideration and Drafting

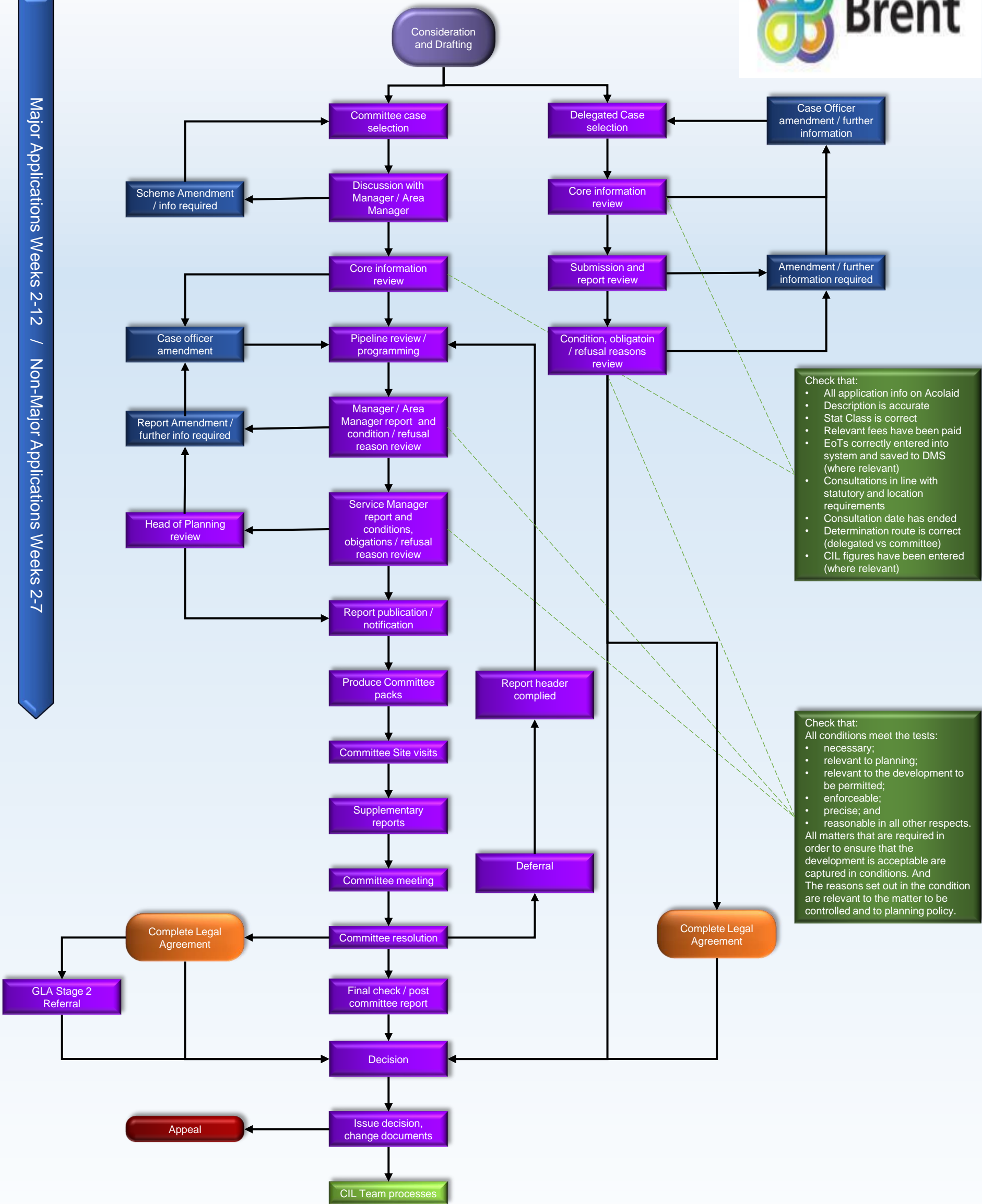
Major Applications Weeks 2-12 / Non-Major Applications Weeks 2-7



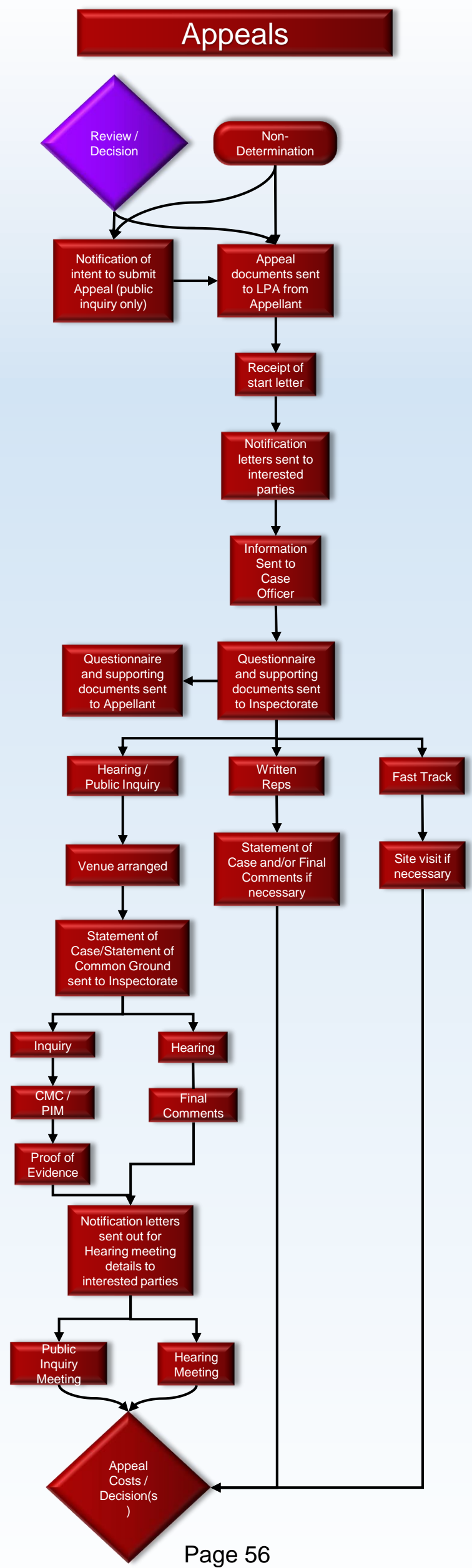
Review / Resolution / Decision



Major Applications Weeks 2-12 / Non-Major Applications Weeks 2-7

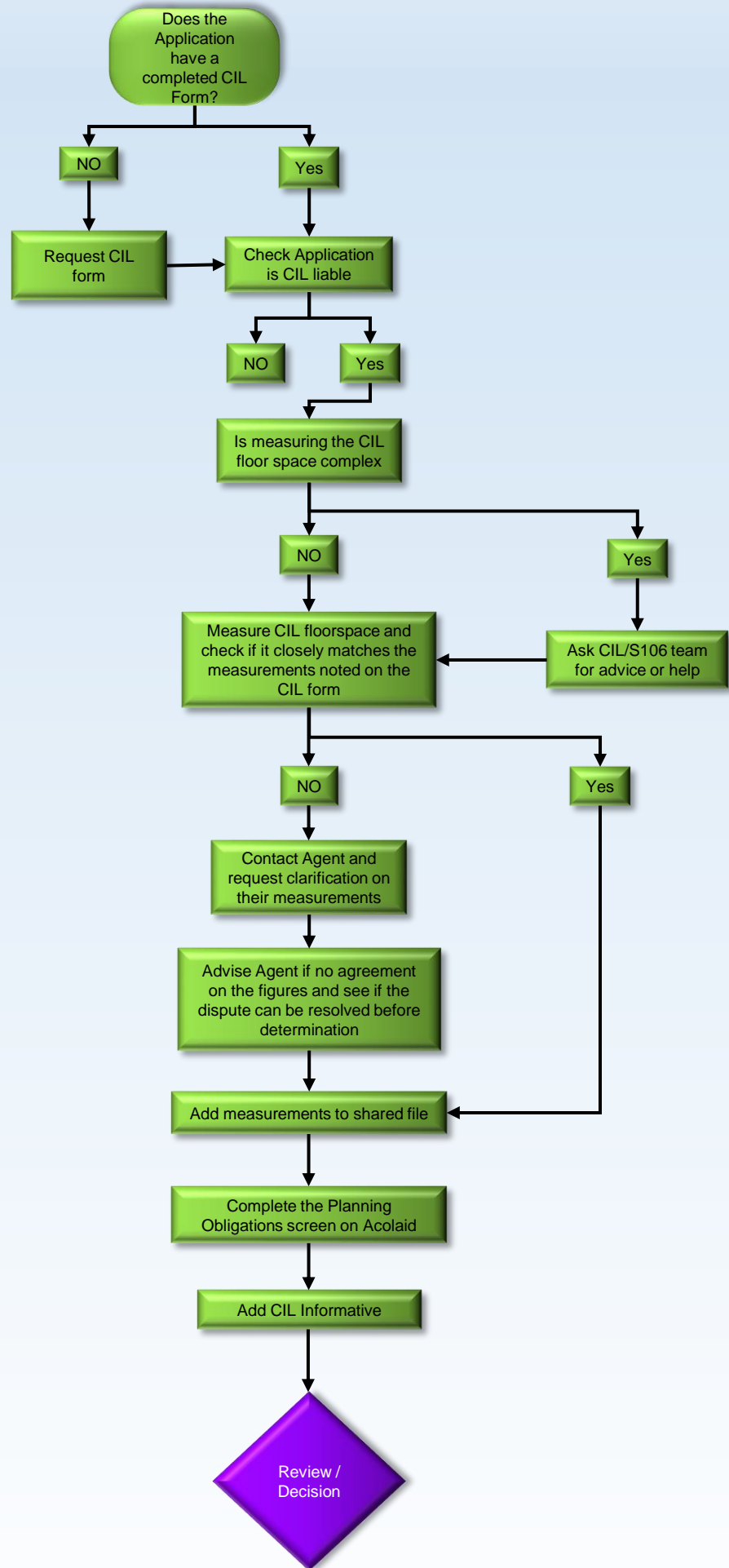


Major Applications Weeks 2-12 / Non-Major Applications Weeks 2-7

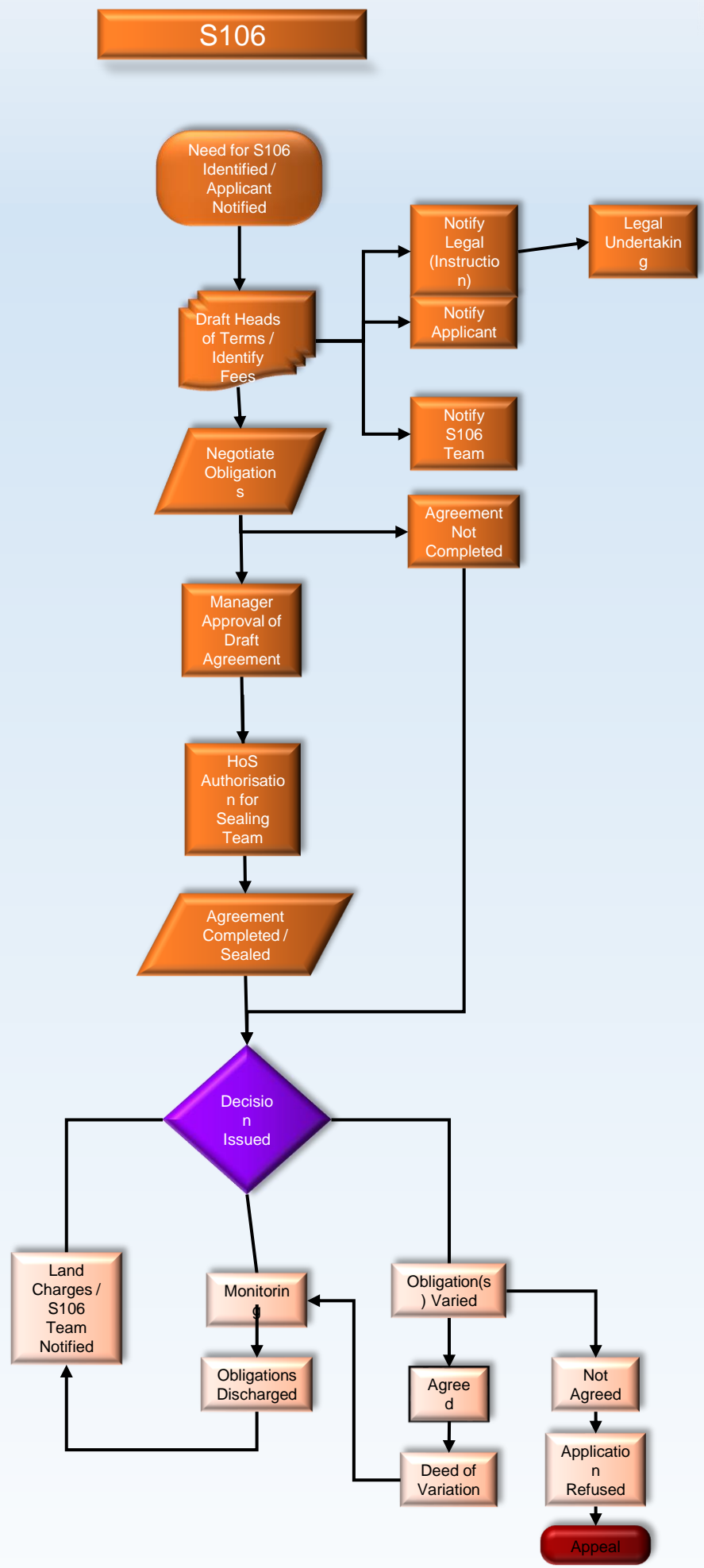



CIL

Major Applications Weeks 2-12 / Non-Major Applications Weeks 2-7



Major Applications Week 2-12 / Non-Major Applications Weeks 2-7



 Brent	Resources & Public Realm Scrutiny Committee 5 November 2024
	Report from the Corporate Director of Neighbourhoods & Regeneration
	Lead Member - Cabinet Member for Regeneration, Planning, & Growth (Councillor Shama Tatler)
Strategic Community Infrastructure Levy and Section 106 Overview	

Wards Affected:	All, excluding parts of Alperton, Harlesden and Kensal Green, Stonebridge and Tokyngton where Old Oak and Park Royal Development Corporation is the Local Planning Authority
Key or Non-Key Decision:	Not Applicable
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:	Three: Appendix A: Brent Annual CIL Rate Summary 2024 Appendix B: Brent S106 Commissioning Application Support Form Appendix C: S106 Funds Available to Allocate
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Martin Paglione Holley, Infrastructure Planning Team Leader 020 8937 4811 Martin.PaglioneHolley@brent.gov.uk

1.0 Executive Summary

- 1.1. The purpose of the report is to provide an update on the collection, allocation, and spend of Strategic Community Infrastructure Levy (SCIL) and Section 106 Agreement contributions made pursuant to the of the Town and Country Planning Act 1990 (S106) over the last 10 years, including information on any unallocated funds and spending priorities.
- 1.2. This report does not consider the collection, allocation and spend of the Neighbourhood Community Infrastructure Levy which is overseen by the Community Grants team in the Partnerships, Housing and Residents Services directorate.

2.0 Recommendation(s)

- 2.1 For Scrutiny Committee to note the content of this report and appendices A, B & C and provide relevant feedback for improvements or further review.

3.0 Detail

3.1 Contribution to Borough Plan Priorities & Strategic Context

3.1.1 The Borough Plan includes commitments to providing affordable housing, tackling climate change, air quality, employment and training, skills, and education.

3.1.2 New development can assist in delivering the Borough Plan priorities in a variety of ways, including through S106 planning obligations and infrastructure delivered through CIL contributions. The council produces an Infrastructure Funding Statement (IFS) every year. This demonstrates how the Council is meeting the priorities through showcasing the collection and subsequent allocation of contributions received from development to projects around the borough, improving the lives of current and future residents.

3.1.3 The allocation and spending of SCIL and S106 contributions, as set out in the IFS annually, also links to and aligns with the priorities and ambitions of several other Council plans and policies including:

- Affordable Workspace Strategy (in relation to S106)
- Brent Local Plan
- Climate and Ecological Emergency Strategy
- Inclusive Growth Strategy
- Long Term Transport Strategy

3.2 Background

3.2.1 Brent uses two key mechanisms to secure funding for infrastructure improvements and community benefits from new developments; S106 and CIL. Both mechanisms are essential in providing local infrastructure in response to the demands created by new development.

3.2.2 While both S106 and CIL are designed to ensure that developments contribute to infrastructure and community services, there are key differences in how they function:

- S106 is negotiated on a case-by-case basis and focuses more on addressing specific impacts of individual developments, such as affordable housing.
- CIL is a fixed charge that applies to most developments and is more broadly used to fund general infrastructure improvements across the borough.

3.2.3 Prior to the adoption of Brent's CIL on 1 July 2013, S106 contributions also covered generic financial contributions such as '*X amount to be spent on*

education, sustainable transport and open space/sports'. This was negotiable per development and could address borough wide issues. The majority of the infrastructure projects which this style of obligation could be spent on is now covered by SCIL however, SCIL requires the money to be spent on physical infrastructure, a restriction which may not have been in the old pre 2013 S106's.

3.3 CIL

What is CIL?

- 3.3.1 CIL is a standardised charge levied on new developments, introduced by the Planning Act 2008 and the CIL Regulations 2010. It is intended to provide a predictable and transparent method for local planning authorities to secure funding for infrastructure improvements.
- 3.3.2 Brent adopted its own CIL on 1 July 2013. CIL is calculated based on the size (measured in square metres) of new developments. Developers pay a fixed amount per square metre of additional floorspace. The levy is charged on most types of new buildings, with some exceptions, such as affordable housing, buildings used by charities and some smaller developments. Brents charging schedule is attached within the 2024 CIL Rate Summary within Appendix A.
- 3.3.3 Once a CIL liable planning permission is granted, the council will issue the developer a Liability Notice which sets out the amount of CIL they will need to pay. If eligible, a developer can then chose to apply for a CIL relief such as social housing, self build or charity relief, which must be submitted prior to the commencement of the scheme or it is void. Once the developer knows their commencement date, they must submit a Commencement Notice to the council prior to commencing. The council will then acknowledge this and send a Demand Notice and an Invoice setting out the payment and the date(s) by which it is due. If the payment date is missed, statutory Late Payment Interest (LPI) is due along with a surcharge.
- 3.3.4 CIL receipts can be broken down into three distinctive portions – the Strategic CIL (SCIL), the Neighbourhood CIL (NCIL) and the Administration CIL. In addition, all London planning authorities are required to collect a Mayoral CIL (MCIL). This is set by the Mayor of London and is required to be passed on to TfL on a quarterly basis to pay for the Elizabeth Line.

Table 1: CIL Portions Description

Portion	% of Receipts	Process
Brent Strategic CIL	70% plus	Spend decided by the Council according to its strategic infrastructure priorities. Spend must support development in Brent, although does not have to be spent by Brent.
Neighbourhood CIL	15% to neighbourhoods or 25% where a neighbourhood plan is in place	A round of bids inviting communities to suggest projects for NCIL funding.

Portion	% of Receipts	Process
CIL Administrative expenses portion	Up to 5%	Spend applied to administrative expenses for collection and enforcement in line with legal restrictions on the use of this funding. Any CIL Admin which is not spent within the year it is received is moved to SCIL.
Mayoral CIL Administrative expenses portion	Up to 4% of MCIL received	

3.3.5 Strategic CIL must be used to fund the improvement or replacement of physical infrastructure (e.g. education, transport facilities, medical facilities, schools, sporting, and open space/recreation facilities) that supports development in the borough. Whilst it cannot be used to resolve pre-existing deficiencies, it can secure improvements to existing infrastructure if it is shown that this supports development and is eligible for CIL funding in line with CIL regulations.

3.3.6 While SCIL is allocated and spent on capital projects, NCIL is allocated to community bids which currently go out annually. The community can bid for projects that meet the above infrastructure requirements but can also be spent on *“anything else that is concerned with addressing the demands that development places on an area.”* However, it must be spent on physical infrastructure. NCIL is usually used for more local interventions.

SCIL Governance

3.3.7 The current SCIL governance arrangements were agreed by Cabinet on 7th September 2020. This set out the requirement that strategic projects are submitted to an Infrastructure Officer Working Group (IOWG) that considers whether each project is eligible for SCIL. It ensures that the projects meet the legal test set out in the CIL regulations 2010 as amended. If eligible, the project manager takes the project to the relevant service board followed by the Capital Programme Board (CPB) for final approval. If the request is for more than £250,000, the decision to agree the SCIL allocation is made by Cabinet.

3.3.8 SCIL can only be spent on physical infrastructure that supports development. It cannot be spent on revenue or feasibility reports. It also cannot be used to repair existing failing infrastructure which is not related to development i.e. potholes, pavement repairs and existing infrastructure deficiencies.

Collection, Allocation and Impact of SCIL Spend

3.3.9 SCIL has been allocated to 26 projects across the borough with a total value of £102,371,676.37. This has had a significant impact on the borough and its residents from providing improved transport connectivity, medical centres, public realm improvements, community centres and libraries. The projects are listed within the tables below.

3.3.10 Table 2 shows the SCIL collected, allocated and spent per ward since Brent started collecting its own CIL. With both Table 2 and Table 3, it should be stated

that we do not have the spend figures for 24/25 as this are provided at the end of the financial year.

Table 2: SCIL Collection, Allocation and Spend per Ward

Ward	SCIL Collected	SCIL Allocated	SCIL Spent
Alperton	£20,627,495.98	£8,537,799.33	£0
Barnhill	£1,202,568.69	£0	£0
Brondesbury Park	£3,436,787.73	£0	£0
Dollis Hill	£2,555,657.35	£200,000.00	£0
Cricklewood & Mapesbury			
Dudden Hill	£4,007,590.44	£0	£0
Fryent	£3,790,840.36	£0	£0
Harlesden	£971,512.11	£3,959,100.00	£542,939.30
Harlesden & Kensal Green	£40,908.37	£0	£0
Kensal Green	£1,593,929.05	£0	£0
Kenton	£480,864.24	£0	£0
Kilburn	£7,739,009.13	£8,608,495.33	£53,512.18
Kingsbury	£122,899.25	£500,000.00	£0
Mapesbury	£621,141.37	£0	£0
Northwick Park	£9,265,974.17	£13,900,621.00	£3,213,323.85
Preston	£2,488,448.06	£1,615,684.77	£1,615,684.77
Queensbury	£3,333,732.47	£0	£0
Queens Park	£2,343,790.09	£0	£0
Roundwood	£2,699.65	£0	£0
Stonebridge	£6,583,968.34	£15,926,427.26	£2,615,579.17
Sudbury	£1,326,635.36	£0	£0
Toykngton	£81,131,269.41	£32,770,333.33	£24,926,853.85
Welsh Harp	£352,839.40	£0	£0
Wembley Central	£16,351,655.35	£0	£0
Wembley Hill	£1,064,631.59	£11,230,000.00	£0
Wembley Park	£9,190,968.85	£0	£0
Willesden Green	£4,662,720.45	£5,123,215.35	£5,123,215.35
Total:	£185,290,537.26	£102,371,676.37	£38,128,608.47

3.3.11 Table 3 shows the projects allocated SCIL, their spend to date, the type of infrastructure and the ward which they took place in.

Table 3 – SCIL Allocated Projects

Project	Infrastructure Type	Ward	SCIL Allocated	SCIL Spent	Project Status
Olympic Way Public Realm Improvements	Public Realm	Tokyngton	£17,800,000.00	£17,800,000.00	Complete
Wembley Two Way Working	Transport	Tokyngton	£1,696,986.38	£1,696,986.38	Complete
North End Road	Transport	Tokyngton	£5,203,013.62	£4,656,610.13	In Progress
Morland Gardens	Community Facilities and Public Realm	Stonebridge	£15,200,000.00	£2,513,151.91	Cancelled
CIL Contribution to Three Medical Centres - Wembley	Health	Tokyngton	£1,157,333.33	£701,596.00	Complete

Project	Infrastructure Type	Ward	SCIL Allocated	SCIL Spent	Project Status
CIL Contribution to Three Medical Centres - Alperton	Health	Alperton	£1,157,333.33	£0	Not Started
CIL Contribution to Three Medical Centres - South Kilburn	Health	Kilburn	£1,757,333.33	£0	In Progress
United College Group (UCG)	Education	Tokyington	£6,500,000.00	£0	Not Started
Northwick Park Spine Road, HIF Underwriting	Transport	Northwick Park	£10,000,000.00	£213,323.85	Complete
Neville House, Winterleys, Carlton House and Carlton Hall	Public Realm	Kilburn	£4,900,000.00	£0	In Progress
Wembley Hostile Vehicle Measures	Transport	Tokyington	£413,000.00	£71,661.34	In Progress
Harlesden Library	Community Facilities	Harlesden	£559,100.00	£542,939.30	Complete
Carlton Vale Boulevard	Public Realm	Kilburn	£1,951,162.00	£53,512.18	Not Started
Stonebridge Redevelopment - New Community Café and External Amenity Space	Community Facilities and Public Realm	Stonebridge	£102,427.26	£102,427.26	Complete
Preston Community Library Redevelopment - New Community Facility	Community Facilities	Preston	£1,615,684.77	£1,615,684.77	Complete
Learie Constantine Centre Redevelopment - New Community Centre	Community Facilities	Willesden Green	£2,643,445.04	£2,643,445.04	Complete
Brent Indian Community Centre Redevelopment - New Community Centre	Community Facilities	Willesden Green	£2,479,770.31	£2,479,770.31	Complete
Grand Union Canal Bridge	Transport	Alperton	£6,855,000.00	£0	Not Started
Alperton Housing Zone Parks Improvements at	Public Realm	Alperton	£525,466.00	£0	In Progress

Project	Infrastructure Type	Ward	SCIL Allocated	SCIL Spent	Project Status
One Tree Hill and Mount Pleasant Open Spaces					
Picture Palace	Community Facilities	Harlesden	£3,400,000.00	£0	In Progress
Neasden Town Centre Connectivity and Place Strategy	Transport	Dollis Hill	£200,000.00	£0	In Progress
Grove Park Pavilion Refurbishment	Community Facilities	Kingsbury	£500,000.00	£0	Not Started
Northwick Park Mortuary Expansion	Health	Northwick Park	£900,621.00	£0	Not Started
Northwick Park Spine Road	Transport	Northwick Park	£3,000,000.00	£3,000,000.00	Complete
Wembley Housing Zone	Community Facilities and Public Realm	Wembley Hill	£11,230,000.00	£0	In Progress
Roy Smith Community Space Fit Out	Community Facilities	Stonebridge	£624,000.00	£0	Not Started
Total:			£102,371,676.37	£38,128,608.47*	

*Includes £37,500 of spend on the Decommissioned Onside Youth Zone project

Strategy for Unallocated SCIL

3.3.12 The Brent Local Plan sets the vision and framework for Brent's development up to 2041. Over this time, the borough will continue to see a significant increase in its population, with around 2,300 new homes each year currently required in order to meet identified housing need together with new industrial and warehousing space and associated physical and social infrastructure. This is expected to increase in the forthcoming London Plan review, with updated government calculations for housing (currently subject to consultation) identifying an increase in the requirement for new homes to approximately 2,900 homes per year.

3.3.13 The infrastructure that is required to support this development is identified within the Council's Infrastructure Delivery Plan (IDP). The IDP examines the infrastructural needs and indicative costs for short, medium, and long-term projects and will help guide decisions on future SCIL allocations. A number of sources are normally required to fund the delivery of infrastructure including SCIL, S106 contributions, capital spend by the Council and income from other sources (e.g. DfE, GLA grant funding, etc).

3.3.14 The Council focuses the spending of SCIL on essential infrastructure to support the level of growth outlined in the Local Plan and the projects identified in the IDP. This is undertaken jointly with partners such as TfL and the NHS through effective and ongoing engagement, ensuring key infrastructure is delivered at the right time and in the right place to support growth and development.

3.3.15 The Council will soon start updating its IDP to inform the future planning of infrastructure across the borough to ensure that it aligns with the growth anticipated to come forward in the Local Plan and Borough Plan priorities, and with the capital pipeline. This provides transparency to residents, members, infrastructure providers and the wider development industry on the type of infrastructure required to support long-term growth and development of the borough.

3.3.16 The proposed updated governance strategy for SCIL, as mentioned above, will help to guide the future allocation of SCIL, ensuring the council can properly plan for future infrastructure needs to facilitate and support growth.

3.4 S106

What is S106

3.4.1 Section 106 (S106) of the Town and Country Planning Act 1990 is a mechanism in UK planning law that allows local authorities to enter into legally binding agreements with developers. These agreements capture "planning obligations" which are used to mitigate the impact of new developments on local communities and infrastructure.

3.4.2 Planning obligations can only be used to mitigate the impact of development that would otherwise be unacceptable. To meet legal tests, they must be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

3.4.3 S106 obligations are focused on site-specific mitigation of the impact of development such as securing affordable housing or requiring improvements to an access road. CIL, on the other hand, is designed to raise funds for infrastructure needed generally as a result of an increase in development in an area and is spent on infrastructure projects across the borough.

3.4.4 While both S106 and CIL are designed to ensure that developments contribute to infrastructure and community services, there are key differences in how they function:

- S106 must be negotiated on a case-by-case basis and focuses more on addressing specific impacts of individual developments, such as affordable housing.
- CIL is a fixed charge that applies to most developments and is more broadly used to fund general infrastructure improvements across the borough.

3.4.5 S106 and SCIL are used in a complementary manner. For larger developments, both mechanisms are likely to be used, with S106 addressing specific local impacts (e.g., affordable housing and site-specific infrastructure), and CIL contributing to broader borough-wide needs.

3.4.6 Financial contributions are commonly sought through S106 towards the implementation of Controlled Parking Zones (CPZ), Affordable Housing or Affordable Workspace (where it can't all be provided on site), Carbon Offsetting for schemes which can't hit the savings target or Employment and Training contributions. Any other financial contribution will have a specific mitigation which it must be spent or contributed towards.

S106 Governance

3.4.7 S106 financial contributions must be spent in accordance with the precise wording within the S106 legal agreement. In some cases, the wording is specific, in other cases it enables some localised discretion. For example 'Contribution towards the upgrade of Northwick Park Pavillion'. This is more general – 'Street tree planting in the locality of the land'.

3.4.8 The current allocation and bid process for S106 financial contributions is set out below:

- Each Quarter a spreadsheet showing all available to allocate S106 contributions, their purpose and the area they must be spent in is sent out across the council to teams and individuals that project manage or are in teams where S106 money which has been collected needs to be spent.
- Teams have three weeks to submit a bid which includes how the project meets the S106 clause. The S106 bid template is included in Appendix B.
- If the project meets the S106 clause and other elements of the bid form, and there are not any competing bids, the project is sent to finance for final approval.

3.4.9 The full details of all of the S106 contributions that have been collected, allocated and spent each year is provided within the annual IFS, along with the affordable housing secured and a list of all S106 agreements that have been agreed that year. This is also reported to the Lead Member each quarter. [Link to current and previous Brent IFS](#)

S106 Collection, Allocation and Spend

3.4.10 Table 4 shows the S106 contributions that have been collected, broken down by ward, for the last 10 years between 1st October 2014 and 30th September 2024.

Table 4 - S106 Collection by Ward Over 10 Years

Ward	S106 Collected
Alperton	£3,460,721.43
Barnhill	£270,246.77
Brondesbury Park	£142,743.58
Cricklewood & Mapesbury	£0

Ward	S106 Collected
Dollis Hill	£3,942,275.87
Dudden Hill	£190,801.00
Fryent	£757,126.06
Harlesden	£366,791.21
Harlesden & Kensal Green	£8,000.00
Kensal Green	£30,093.94
Kenton	£65,014.54
Kilburn	£3,246,759.21
Kingsbury	£17,500.00
Mapesbury	£703,834.90
Northwick Park	£627,025.17
Preston	£668,102.12
Queensbury	£5,660,186.16
Queens Park	£1,612,990.77
Roundwood	£49,030.40
Stonebridge	£1,285,377.35
Sudbury	£227,745.42
Toykngton	£7,541,208.94
Welsh Harp	£0
Wembley Central	£2,484,402.91
Wembley Hill	£199,038.27
Wembley Park	£17,500.00
Willesden Green	£657,099.54
Total:	£34,231,615.56

3.4.11 Table 5 shows the S106 contributions that have been collected and allocated, broken down by ward, for the last five years from 1st April 2019 to 30th September 2024. We do not have ward data recorded for each project before 2019/20. We also do not have the spend per project as the ward data has only been recorded on allocation. However, of the **£22,167,554.78** allocated in this period, **£8,222,093.80** has been spent.

Table 5 – S106 Collected, Allocated & Spent per Ward Over Five Years

Ward	S106 Collected	S106 Allocated
Alpertton	£3,292,657.82	£265,469.12
Barnhill	£262,746.77	£106,000.47
Brondesbury Park	£117,269.02	£40,474.56
Dollis Hill	£3,942,275.87	£37,637.10
Cricklewood & Mapesbury	£0	£0
Dudden Hill	£173,066.29	£1,375,887.29
Fryent	£700.00	£226,600.00
Harlesden	£10,351.81	£92,186.84
Harlesden & Kensal Green	£8,000.00	£0
Kensal Green	£0	£0
Kenton	£0	£75,810.31
Kilburn	£1,608,815.75	£1,795,930.46
Kingsbury	£17,500.00	£0
Mapesbury	£0	£36,458.29
Northwick Park	£567,840.05	£58,000.36
Preston	£537,363.20	£658,701.36
Queensbury	£4,186,502.92	£936,673.57

Ward	S106 Collected	S106 Allocated
Queens Park	£1,060,176.62	£145,760.99
Roundwood	£49,030.40	£0
Stonebridge	£65,796.54	£232,416.83
Sudbury	£100,435.35	£0.00
Toyknngton	£5,368,684.49	£4,403,539.53
Welsh Harp	£0	£0
Wembley Central	£1,244,764.93	£492,772.68
Wembley Hill	£199,038.27	£1,189,343.76
Wembley Park	£17,500.00	£188,852.72
Willesden Green	£280,495.61	£2,910,000.00
Borough Wide	N/A	£6,899,038.54
Total:	£23,111,011.71	£22,167,554.78

3.4.12 Table 6 shows the S106 contributions that have been collected, allocated and spent per obligation type for the last 10 years between 1st October 2014 and 30th September 2024. It is important to note that we will have collected money that was secured within S106 agreements that were agreed prior to the adoption of CIL in Brent and some of these could be used for multiple uses.

Table 6 – S106 Collected, Allocated & Spent per Type Over Ten Years

Contribution Type	S106 Collected	S106 Allocated	S106 Spent
Affordable Housing	£8,268,731.20	£8,228,731.20	£4,993,297.14
Affordable Workspace	£860,186.53	£654,882.22	£143,037.82
Amenity or Recreation	£72,461.33	£67,455.55	£65,958.90
Art	£7,500.00	£2,838.20	£894.20
Carbon Offset	£5,547,277.34	£1,995,909.98	£129,118.34
Community	£213,576.29	£163,576.29	£153,215.78
Education in Ealing*	£216,207.18	£216,207.18	£216,207.18
Education	£177,979.61	£177,979.61	£177,979.61
Education, Open Space or Transport	£210,968.99	£210,968.99	£196,712.97
Employment & Skills	£1,351,030.78	£892,610.21	£687,375.97
Environment	£1,227,536.76	£763,811.31	£617.91
Environmental Health	£10,617.91	£10,617.91	£7,255.97
Landscape	£713,653.56	£480,811.53	£248,263.49
Parking & Lighting	£14,750.83	£14,750.83	£14,750.83
Parks	£1,020,642.65	£674,176.94	£545,580.18
Schools	£1,130,610.73	£1,130,610.73	£1,041,796.60
Social	£39,335.45	£39,335.45	£29,641.22
South Kilburn Regeneration	£1,431,294.97	£1,431,294.97	£66,835.49
Sports	£12,250.00	£12,250.00	£12,250.00
TfL	£2,590,511.97	£1,985,035.58	£1,985,035.58
Transportation	£9,114,491.48	£7,800,035.67	£5,908,486.96
Totals:	£34,231,615.56	£26,953,890.35	£16,624,312.14

*This is from a 2012 permission in Park Royal

Strategy for Unallocated S106

3.4.13 S106 financial contributions must be allocated in accordance with the requirements within the individual S106 legal agreement. Relevant teams must

identify specific projects which meet those requirements and those teams require sufficient capacity to create and deliver the projects. In some instances this can result in longer periods between the receipt of the funding and the delivery of projects. Where there are unallocated S106 contributions, we work with the relevant teams to find projects or earmark contributions for future projects to ensure they can be spent within the timeframes set out in the legal agreement. Additionally, some smaller sums may remain after projects have been completed and decommissioned.

3.4.14 We have allocated £22,167,554.78 amount of S106 contributions to 92 projects over the last five years, demonstrating the proactive allocation of the available monies.

4.0 Stakeholder and ward member consultation and engagement

4.1 Quarterly reporting on infrastructure priorities and projects, as well as the SCIL and S106 allocation, expenditure and income, is provided to the Cabinet Member for Regeneration, Planning & Growth.

5.0 Financial Considerations

5.1 Projects applying for SCIL and s106 funding are proposed via the capital pipeline with a spend profile spanning 2 – 5 years. In the first instance they are reviewed by the Infrastructure Officer Working Group (IOWG) before progressing through approval stages via relevant programme sub-board, the Capital Programme Board then finally Cabinet. Proposals presented from the pipeline must have a viable business case and will deliver value for money (VfM) for the Council.

5.2 The IOWG was established to standardise the approach to how the Council manages its governance processes concerning the application of strategic CIL (SCIL) to ensure that priorities within the Local Plan and Infrastructure Delivery Plan are met.

5.3 The s106 and SCIL teams work closely with finance to monitor available reserve funding for projects, which are commissioned/decommissioned by Finance depending on available funding.

5.4 Actual spend for s106 and SCIL is already covered in detail elsewhere within this paper.

6.0 Legal Considerations

6.1 Following the adoption of CIL in Brent on 1 July 2013, S106 planning obligations are only considered if the planning obligation assists in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms. They must be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

6.2 These tests are set out as statutory tests in regulation 122 of the CIL Regulations (as amended by the 2011 and 2019 Regulations) and as policy tests in the National Planning Policy Framework. These tests apply whether or not there is a levy charging schedule for the area. Any financial contribution received must be spent in accordance with the S106 to which it relates.

6.3 The SCIL can be used to fund a wide range of physical infrastructure, including transport, flood defences, schools, hospitals, and other health and social care facilities (for further details, see section 216(2) of the Planning Act 2008, and regulation 59, as amended by the 2012 and 2013 Regulations). This definition allows the levy to be used to fund a very broad range of facilities such as 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 (the Development Plan and the London Plan in London). It is up to the Council to decide where to apply CIL in relation to infrastructure in the Borough.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

7.1 The public sector equality duty set out in Section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have due regard to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, and to advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not share that protected characteristic. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

7.2 The report does not have a direct impact on EDI. Each project that comes forward for funding would need to be subject to EDI considerations prior to applying for SCIL or S106 funding.

8.0 Climate Change and Environmental Considerations

8.1 The Council declared a climate and ecological emergency in 2019 and set out to do all reasonable in the Council's gift, within available resources and competing priorities, to aim for carbon neutrality for the borough by 2030. The Council has subsequently adopted a Climate and Ecological Emergency Strategy (2021-2030) which sets out the council's route map to achieve this aim.

- 8.2 The IFS demonstrates Brent's commitment to the Brent Climate & Ecological Emergency Strategy through showcasing the use of SCIL and S106 allocations which meet the Key Themes of the document, in particular:
- Key Theme 2 - '1. Supporting and Encouraging Active Travel' through the Neasden Town Centre Connectivity and Place Strategy SCIL project;
 - Key Theme 3 - '1. Improving Energy Efficiency' through the Social Housing Decarbonisation S106 project;
 - Key Theme 4 - '1. Enhancing Green Spaces and Biodiversity' through the Chalkhill Parks Improvements, Heather Park Dog Station, Lawrence Avenue Open Space Improvements, and One Tree Hill Paths S106 projects; and
 - Key Theme 5 – '3. Brent Carbon Offset Fund' through the collection of Carbon Offset S106 contributions throughout the financial year.
- 8.3 Since 1 October 2016, all developments must be carbon neutral achieved through a combination of on-site carbon reduction measures together with a financial contribution to a Carbon Offset Fund. Both the on-site carbon reduction measures and the financial contributions are secured through S106 obligations. The contributions are used to fund local carbon reduction projects, thereby offsetting the development's carbon emissions shortfall.
- 8.4 Brent is a Local Planning Authority (LPA), and the London Plan requires LPAs to:
- Set up a Carbon Offset Fund that is ring-fenced to secure delivery of carbon savings within the relevant LPA;
 - Set a price for carbon, i.e. price per annual tonne of carbon, that developers pay to make up any shortfall in on-site carbon savings, securing contributions through S106 agreements;
 - Identify a suitable range of projects that can be funded through the Carbon Offset Fund; and
 - Put in place suitable monitoring procedures to enable reporting to the GLA.
- 8.5 The GLA has specific guidance on the Carbon Offset Fund, which is available online, but the fundamental purpose of the fund is that it should be used for tangible carbon reduction projects in homes and buildings, although education projects are also eligible. There are specific criteria related to the amount of carbon reduction achieved.
- 8.6 Since Cabinet agreement was obtained in October 2022, the Council has allocated its Offset Fund via a three-way split between Council Housing (60%), Community Schools (30%), and other (10%). A decision was made by Brent's Cabinet at its meeting on 14 October 2024 to remove this existing allocation split, and for the fund to be utilised in a more agile and flexible way going forward. The expenditure and allocation to date following the previous policy is set out below:

Category	Percentage Allocated	Total Allocation	Expenditure to Date	Amount Remaining
Housing	60%	£2,774,716	£900,000	£1,874,716
Schools	30%	£1,387,358	£595,910	£791,449
Other	10%	£462,453	£139,503	£322,950
Total	100%	£4,624,527	£1,635,412	£2,989,115

- 8.7 The figures provided on current SCIL allocations within this report reflect figures up until Q2 (end of Sept 2024). At a meeting of Brent's Cabinet on 14 October 2024, Cabinet agreed approved a capital budget allocation of £3mil of SCIL to implement the Church End and Roundwood Green Corridors Scheme. This scheme affects Roundwood and Harlesden & Kensal Green wards, as part of the council's Church End & Roundwood Green Neighbourhood scheme and will be reflected accordingly in the Q3 breakdown.

9.0 Communication Considerations

- 9.1 The IFS is published on the Brent Council website annually before 31st December as required the CIL regulations (as amended, 2019) and sets out all the SCIL and S106 money which has been collected, allocated and spent within the previous financial year, along with the total amount available to allocate.

Report sign off:

Alice Lester

Corporate Director of Neighbourhoods & Regeneration

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Brent Community Infrastructure Levy Rate Summary 2024



1 Brent Annual Community Infrastructure Levy (CIL) Rate Summary - 2024

- 1.1 This Annual CIL Rate Summary has been prepared in accordance with Regulation 121C of the Community Infrastructure Levy (CIL) Regulations 2010 (amended 2019) which requires the London Borough of Brent as a charging authority to publish this statement in relation to the calendar year beginning 1st January 2024.
- 1.2 The BCIS All-in Tender Price Index applicable for the year 2013 is 224. That is the index that is now used for the purpose of the rates contained within the charging schedule (1c) as per Regulation 121c (iii) (see below table 1).
- 1.3 For planning permissions granted in the year 2024, the RICS CIL Index to apply will be 381 as [published](#) on 23rd October 2023 by Royal Institution of Chartered Surveyors (RICS). This will confirm the index for the permission (1y) as per [Regulation 121c \(iii\)](#). See below table 2 for CIL Index rates 2024.

2 The Charging Authority

- 2.1 The Charging Authority is the London Borough of Brent.

3 Year to which the CIL rate summary relates

- 3.1 This CIL Rate summary relates to the year 2024.

4 Date of Effect of the CIL charging schedule

- 4.1 The Charging Schedule came into effect on 1st July 2013.
- 4.2 On 1st September 2020, the use class schedule was updated. To ensure that CIL charging schedules continue to operate and have proper effect, the Town and Country Planning (Use Classes) (Amendment) (England) (No.2) Regulations 2020 inserted the new regulation 4A into the Amendment Regulations. Regulation 4A applies to charging schedules which were approved and published by charging authorities before 1st September 2020. It provides that any references to the use classes that were specified in the Use Classes Order prior to 1 September 2020 are to be read as if they were references to the descriptions of the uses which comprised those use classes before that date.
- 4.3 For example, where the CIL rates for a specific use, such as A1 retail (which became part of the Commercial, Business and Service use class E from 1 September 2020) should continue to be applied to retail development previously categorised within Use Class A1.

5 CIL Rates

- 5.1 Table 1 below sets out the Charging Schedule, with Table 2 setting out the CIL Indexed Rates for 2024.
- 5.2 Brent Council is also a 'Collecting Authority' for the Mayor of London MCIL1 and MCIL2. This is an additional CIL charge on top of Brent CIL, which is calculated and collected by Brent Council then passed onto the Mayor of London. See [link](#) pages for further information.

Table 1: CIL Charging Schedule

Category	Proposed Use	Charge per Sqm
1	Residential (Use Classes C3 & C4), Residential Institutions except Hospitals (Use Class C2), Student Accommodation, Hostels and HMOs (Sui Generis)	£200
2	Hotel (Use Class C1)	£100
3	Retail (Use Class A1), Financial & Professional Services (Use Class A2), Restaurants & Cafes (Use Class A3), Drinking Establishments (Use Class A4), Hot Food Take-aways (Use Class A5), Office (Use Class B1a), All Sui Generis uses except Student Accommodation, Hostels, HMOs, Public Transport Stations, Theatres, Water and wastewater infrastructure, Fire stations and fire service facilities, Police stations and police facilities, and Warehouse Clubs	£40
4	Warehouse Clubs (Sui Generis)	£14
5	Assembly and Leisure, excluding Public Swimming Pools (Use Class D2)	£5
6	Light Industry and Research & Development (Use Class B1b&c), General Industrial (Use Class B2), Storage & Distribution (Use Class B8), Health, Education, Public Libraries, Museums, Public Halls and Places of Worship (Use Class D1a-h), Hospitals (Use Class C2), Public Swimming Pools (Use Class D2), Public Transport Stations, Theatres, Water and wastewater infrastructure, Fire stations and fire service facilities, and Police stations and police facilities (Sui Generis)	£0 (Zero Charge)

Table 2: CIL Indexed Rates for 2024

Category as per Above	Charge per Sqm (Non – Indexed)	Charging Schedule Index (lc)	RICS CIL Index (ly)	Charge per Sqm (Indexed)
1	£200	224	381	£340.18
2	£100	224	381	£170.09
3	£40	224	381	£68.04
4	£14	224	381	£23.81
5	£5	224	381	£8.50
6	£0	224	381	£0.00

Infrastructure Planning Team

London Borough of Brent Brent
Brent Civic Centre
Engineers Way
Wembley Park
Wembley, London
HA9 0FJ

Email: CILad@brent.gov.uk

Brent S106 Commissioning Application Support Form

Project title	
----------------------	--

Service Area	<i>ie Parks, Highways, Education etc</i>
Head of Service	
	Evidence of approval provided? Yes <input type="checkbox"/> No <input type="checkbox"/>
Lead Member	
	Evidence of approval provided? Yes <input type="checkbox"/> No <input type="checkbox"/>
Other Service Consultation	Does the project crossover another Service Area? Yes <input type="checkbox"/> No <input type="checkbox"/>
	Evidence of approval provided? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

Project Address	<i>Please also provide a site location map</i>
Ward	

Project Description	
<i>Ensure all works to be undertaken are also specifically detailed</i>	
Documents detailing the project provided? Yes <input type="checkbox"/> No <input type="checkbox"/>	
S106 Details (S106 which is providing the contribution)	Planning Ref: S106 Clause No.:
Relevant S106 Clause Text & Relevant Definitions (S106 which is providing the contribution)	
<i>An image(s) is fine</i>	

Brent S106 Commissioning Application Support Form

How does the project meet the S106 obligation

Total amount required	£	<i>Please attach budget detailing costs</i>
Total S106 funding required	£	<i>Please attach budget detailing costs</i>

Forecasted S106 drawdown		Year 1	Year 2	Year 3	Year 4	Year 5	
	Year						Total
	S106						
Total other funding secured	£						
	Please explain the sources of this funding:						

Estimated start date			
Estimated end date			
Key Milestones	Estimated Date		
Milestone 1			
Milestone 2			
Milestone 3			

Brent S106 Commissioning Application Support Form

Milestone 4	
Milestone 5	

Other dependent infrastructure/triggers? *Is delivery of this project dependant on any other project/s coming forward or being completed?*

Deliverability? *Is there the resource to deliver the project and are there other projects being delivered at the same time?*

High level outputs and outcomes

Outputs – *defined as what is being delivered by the project*

Outcomes/wider benefits – *defined as the change which occurs as a result of the outputs*

Key risks and steps taken to mitigate against risks

Risks	Mitigating Actions Taken
Risk 1	
Risk 2	
Risk 3	
Risk 4	
Risk 5	

Brent S106 Commissioning Application Support Form

Does the project have any associated or partner organisations?	
Organisation	Rationale for inclusion in Project
Organisation 1	
Organisation 2	

Completed by		Date	
Email address		Tel.	

Project Manager		Date	
Email address		Tel.	

Submission Checklist

Application support form	
Commissioning form	
Site location map	
Supporting Documents for the project	
Budget breakdown of costs (with evidence)	
Budget breakdown of S106 costs (with evidence)	
Evidence of other funding (if applicable)	

Address	Wards	Planning Ref.	Type of Contribution	Purpose of Contribution	Available to Commission
Parkwood House, Albion Way, Wembley, HA9 0LP	All Wards	17/2782	Affordable Housing	Affordable Student Housing	£ 40,000.00
Land Former 17 Northfields, Beresford Avenue, Wembley, HA0 1NW (Known as Grand Union)	All Wards	20/2784	Affordable Workspace	Affordable Workspace	£ 128,997.85
Former Northfield Industrial Estate & units 2-18 Beresford Avenue & Abbey Works Estate, Wycombe Road, Wembley, HA0 & Ace Corner & Capital House, North Circular Road, London, NW10	All Wards	18/0321	Affordable Workspace	Affordable Workspace	£ 47,292.40
units 2-18 Beresford Avenue & Abbey Works Estate, Wycombe Road,	All Wards	18/0321	Affordable Workspace	Affordable Workspace	£ 11,841.02
Parkwood House, Albion Way, Wembley, HA9 0LP	All Wards	17/2782	Affordable Workspace	Affordable Workspace	£ 495.30
Former Northfield Industrial Estate & units 2-18 Beresford Avenue & Abbey Works Estate, Wycombe Road, Wembley, HA0 & Ace Corner & Capital House, North Circular Road, London, NW10	All Wards	18/0321	Affordable Workspace	Affordable Workspace	£ 16,677.74
ALLOTMENTS N/T 2 BRIDGE ROAD, Gibbons Road, Neasden, London, NW10	Stonebridge	00/2262	Amenity	6 street trees in the vicinity/locality of the land	£ 1,150.00
Wembley Park Station Car Park and Train Crew Centre, Brook Avenue, Wembley	Preston	20/0967	Amenity	a) Improvements to signage and way markings between Chalkhill Park/Linear Park, St David's Close Open Space and Chalkhill Open Space and assoc. maintenance for 10 years; and b) Improvements to paths and access between Chalkhill Open Space towards Quintain's Street	£ 35,799.04
Keelers Service Centre, Harrow Road, Wembley, HA0 2LL	Sudbury	18/3069	Amenity	Amenity Space Contribution	£ 12,859.11
Hospital, Nightingale Avenue, London, HA1 3GX	Northwick Park	20/0701	Amenity	Biodiversity Contributions towards improvements to enhance and protect biodiversity on the boundary between the Development and edge of Northwick Park as shown coloured green on Plan 5	£ 11,987.18
2A, Preston Waye and 283, 285 & 287 Preston Road, Harrow, HA3	Barnhill	18/4902	Amenity	Boundary Treatment Contributions towards improvements to the landscaping immediately adjacent to the eastern boundary to the Land so as to ensure adequate levels of amenity to the Dwellings at basement level	£ 37,893.80
Land adjacent to Northwick Park Hospital, Nightingale Avenue, London,	Northwick Park	20/0701	Amenity	Contribution towards the upgrade of Northwick Park Pavillion	£ 296,679.49
293 Neasden Lane,	Dudden Hill	10/0228	Amenity	Education in the borough, sustainable transport in the local area, sport and/or open space in the area	£ 0.40
Dicey, 289-293 Neasden Lane, London, NW10 1QR	Dudden Hill	04/3715	Amenity	Neasden Town Centre & environmental improvements to open space	£ 3,319.21
1-7, 9, 11 & 11A Elm Road, Wembley, HA9 7JA	Wembley Central	18/1592	Amenity	Planting & maintenance of street trees within public realm in the vicinity of the development along St John's Road & Elm Road	£ 11,145.76
Central Middlesex Hospital, Abbey Road, NW10	Stonebridge	98/1486	Amenity	Public transport and environmental works or studies within Park Royal	£ 6,409.00
21, 21A, Car Park opposite United Biscuits and Gormley House, Waxlow Road, London, NW10	Stonebridge	15/1147	Amenity	Replacement of trees in the vicinity of the Development	£ 1,504.02
Unit D, 150D Coles Green Road, London, NW2 7JL	Dollis Hill	05/1832	Amenity	Street tree planting in the locality of the land	£ 2,000.00


Land at 255, Ealing Road, Wembley, HA0 1ET	Alperton	14/2276	Amenity	Street trees along the route between the Development and the Alperton Sports Ground public open space	£	27,362.98
219 Kingsbury Road, NW9 8WP	Fryent	07/1160	Amenity	Street trees in the locality	£	5,354.20
76 Eton Avenue, Wembley	Sudbury	10/0535	Amenity	Towards the provision of replacement trees in the vicinity of the site	£	1,000.00
60 Neasden Lane and 450 High Road, London, NW10	Dudden Hill	14/4254	Amenity	Tree contribution towards the planting of seven trees on the High Road adjacent to the Development	£	14,086.32
55 Waterloo Road, London, NW2 7TS	Dollis Hill	05/2549	Amenity	Tree planting in the locality of the land	£	5,000.00
All flats at 93 & 95 Cricklewood Broadway, London, NW2 3JG	Mapesbury	15/4696	Amenity or Recreation	Mapesbury Dell turfing contributions	£	2,000.00
Builders Depot, Abbey Road, NW10	Stonebridge	07/0066	Amenity or Recreation	Open space and landscaping improvements including a contribution towards the 10,000 trees to be provided as part of the Park Royal project	£	1,589.92
Storage rear of 397 High Road & Rear Part of 397A, Rosemead Avenue, Wembley, HA9	Wembley Central	11/1030	Amenity or Recreation	Sport and/or open space in the local area	£	10,210.56
Former London Transport Sports Ground, Old Kenton Lane Kingsbury, NW9 9ND	Kenton	95/0270	Amenity or Recreation	towards the cost of a sports pavilion/interpretation centre including car parking and recreational facilities within the land edged blue shown on the plan annexed hereto (see plan)	£	90,000.00
2-8 Malvern Road, London, NW6 5PP	Kilburn	15/1050	Amenity or Recreation	Towards the improvement of public space north of the site on the junction of Chippenham Gardens and Malvern Road to include but not limited to tree planting	£	5,005.78
Land to the West of St Mary's Church England School Mayo Road London NW10	Harlesden	07/2476	Amenity or Recreation	towards the improvements of the adjoining cemetery and open space	£	199,445.15
Central Middlesex Hospital Abbey Road	Stonebridge	05/3174 & 99/0618	Amenity or Transport	Environmental improvements and/or improvements of local infrastructure and public transport facilities in the Park Royal area	£	12,892.18
Brent Town Hall, 54 Forty Lane, Wembley,	Barnhill	13/1995	Art	Towards commissioning, installing and maintaining a modest piece of art work or street furniture in Chalkhill Park commemorating the previous use of the site as a Local Government Town Hall	£	4,661.80
Wembley Park Station Car Park and Train Crew Centre, Brook Avenue, Wembley	Preston	20/0967	Carbon Offset	Carbon Offset	£	195,540.12
100 Beresford Avenue, Wembley, HA0 1QJ	Alperton	20/1424	Carbon Offset	Carbon Offset	£	102,572.88
JVC Business Park, Priestley Way, NW2	All Wards	22/1849	Carbon Offset	Carbon Offset	£	355,857.75
60 Neasden Lane, London, NW10 2UW	All Wards	17/2477	Carbon Offset	Carbon Offset	£	90,937.41
units 2-18 Beresford Avenue & Abbey Works Estate, Wycombe Road, Wembley, HA0 & Ace Corner &	All Wards	18/0321	Carbon Offset	Carbon Offset	£	38,703.30
Former Northfield Industrial Estate & units 2-18 Beresford Avenue & Abbey Works Estate, Wycombe Road, Wembley, HA0 & Ace Corner & Capital House, North Circular Road, London, NW10	All Wards	18/0321	Carbon Offset	Carbon Offset	£	286,667.50

Car Park North East of Morrisons, Honeypt Lane, NW9 & Vacant Land at the junction of Westmoreland Road, NW9 and Cumberland Road, Stanmore, HA7	All Wards	18/2183	Carbon Offset	Carbon Offset	£	227,610.22
Land, garages, alleyway rear of 416-444, High Road, Wembley, HA9	All Wards	18/3111	Carbon Offset	Carbon Offset	£	18,969.67
10 & 11 Watkin Road, Wembley, HA9 ONL	All Wards	18/3381	Carbon Offset	Carbon Offset	£	312,368.57
Euro House, Fulton Road, Wembley, HA9 0TF	All Wards	21/2989	Carbon Offset	Carbon Offset	£	592,759.54
233 Willesden Lane, Willesden, London, NW2 5RP	All Wards	21/0090	Carbon Offset	Carbon Offset	£	108,151.60
1-64 INC Neville House & Neville House Garages, Neville Road, 1-64 INC Winterleys and Seahorse Day	All Wards	23/1935	Carbon Offset	Carbon Offset	£	169,025.28
Land rear of 390-408, High Road, Wembley, HA9	All Wards	23/2811	Carbon Offset	Carbon Offset	£	85,716.57
JVC Business Park & JVC House, Priestley Way and 717, 719 & 721 North Circular Road, Neasden,	All Wards	22/4185	Carbon Offset	Carbon Offset	£	470,695.55
1-7 Bridgehill Close, Wembley, HA0 1EP	All Wards	20/1213	Carbon Offset	Carbon Offset	£	3,524.59
Canterbury Terrace, 8-14 Neville Close, 2 Canterbury Road & Peel Site	Kilburn	19/3259	Carbon Offset	District Energy Centre Contributions	£	462,397.07
64, 66, 66a Ealing Road and land and building to the west side of Ealing Road, Wembley	Wembley Central	10/1803	Education or Transport or Recreation	Education in the borough, sustainable transport in the local area, sport and/or open space in the area	£	0.49
904 Harrow Road, London, NW10 5JU	Kensal Green	13/0224	Education or Transport or Recreation	Education in the borough, sustainable transport in the local area, sport and/or open space in the area	£	0.60
29-31 Abbey Road, NW10 7SJ	All Wards	22/2310	Employment	Employment & Training	£	25,200.00
JVC Business Park, Priestley Way, NW2	All Wards	22/1849	Employment	Employment & Training	£	102,907.53
374 Ealing Road, Wembley, HA0 1HG	All Wards	21/2205	Employment	Employment and Training contributions	£	20,721.76
JVC Business Park & JVC House, Priestley Way and 717, 719 & 721 North Circular Road, Neasden, London, NW2	All Wards	22/4185	Employment	Employment and Training contributions	£	196,269.58
Fairgate House, 390-400 and 402-408 (Even), High Road, Wembley, HA9	All Wards	22/2225	Employment	Local People Employment Requirement	£	42,178.69
Land rear of 390-408, High Road, Wembley, HA9	All Wards	23/2811	Employment	Local People Employment Requirement – Support Fee (Construction Phase)	£	71,143.01
713 North Circular Road, NW2 7AX	Dollis Hill	06/2711	Environment	Flood Alleviation	£	10,000.00
South Kilburn Regeneration Roundabout Site, Carlton Vale, London, NW6	Kilburn	12/0661	Environment	Sustainability measures to enable the development to reach Sustainable Homes level 4	£	1,328.38

All Flats at Avery Court, Bree Court, Cara House, Dara House and Everly House, 39, 42-44 INC, 47 AND 49 Capitol Way, NW9 and 401A & 401B Edgware Road, London, NW9 (Formerly known as Land at Junction of Edgware Road, Capitol Way, London, NW9)	All Wards	22/2954	Landscape	Contributions for the planting of seven trees within the borough	£	17,500.00
330 Ealing Road, Wembley, HA0 4LL	Alperton	20/3914	Landscape	Contributions for the planting of seventeen street trees within the vicinity of 330 Ealing Road	£	53,128.53
Land Surrounding Wembley Stadium Station, South Way, Wembley	Wembley Park	14/4931	Landscape	Street Trees contributions towards provision of offsite street trees	£	17,500.00
Flats 1-4 INC, First Floor Front and Cottrell House, 53-63 Wembley Hill Road, Wembley, HA9 8DL	Tokyngton	16/1698	Recreation	Towards the planting of street trees in Linden Avenue and Dagmar Avenue	£	14,994.48
Wembley Park Station Car Park and Train Crew Centre, Brook Avenue, Wembley, HA	Preston	20/0967	TFL	Bus Services Contribution to transfer to TFL Contributions	£	75,062.50
Land, garages, alleyway rear of 416-444, High Road, Wembley, HA9	Wembley Central	18/3111	TFL	Bus Services Contribution to transfer to TFL Contributions	£	1,679.41
Land, garages, alleyway rear of 416-444, High Road, Wembley, HA9	Wembley Central	18/3111	TFL	Bus Services Contribution to transfer to TFL Contributions	£	528,734.48
LAND N/T 864, Harrow Road, London, NW10	Queens Park	02/2794	Transport	Car Club	£	3,000.00
Land N/T 2, Atlip Road, Wembley HA0	Alperton	06/0845 & 06/0856	Transport	Car Club	£	6,880.28
1018 Harrow Road, London, NW10 5NS	Kensal Green	12/2891	Transport	Car Club	£	2,182.22
186 Church Road, London,	Dudden Hill	12/3037	Transport	Car Club	£	6,241.66
186 Church Road, London,	Dudden Hill	12/3038	Transport	Car Club	£	2,080.55
Land at 255, Ealing Road, Wembley, HA0 1ET	Alperton	14/2276	Transport	CPZ Contribution	£	52,212.08
1C Carlyon Road, Wembley, HA0 1HP	Alperton	15/3950	Transport	CPZ Contribution	£	15,589.37
Chesterfield House, 9 Park Lane, Wembley, HA9 7RH	Wembley Central	15/4550	Transport	CPZ Contribution	£	949.04
MAHATMA GANDHI HOUSE, 34 Wembley Hill Road, Wembley, HA9 8AD	Tokyngton	15/4714	Transport	CPZ Contribution	£	14,109.97
6 Bowmans Trading Estate, Westmoreland Road, London, NW9 9RL	Queensbury	16/0595	Transport	CPZ Contribution	£	280.47
Flats 1-4 INC, First Floor Front and Cottrell House, 53-63 Wembley Hill Road, Wembley, HA9 8DL	Tokyngton	16/1698	Transport	CPZ Contribution	£	5,066.25
All Units, 253A Ealing Road, Wembley, HA0 1ET	Alperton	17/1104	Transport	CPZ Contribution	£	10,000.00
Units 1-5 Inc, Cannon Trading Estate, First Way, Wembley, HA9 0JD	Tokyngton	17/3797	Transport	CPZ Contribution	£	103,426.79
Front Forecourt, Wembley Point, 1 Harrow Road, Wembley, HA9 6DE	Tokyngton	18/3125	Transport	CPZ Contribution	£	212,556.02
10 & 11 Watkin Road, Wembley, HA9 0NL	Tokyngton	18/3381	Transport	CPZ Contribution	£	108,500.00

290B Ealing Road, Wembley, HA0 4LL	Wembley Central	19/1761	Transport	CPZ Contribution	£	5,190.31
Wembley Stadium, Olympic Way, Wembley, HA9 0ND	Tokyngton	99/2400	Transport	CPZ Contribution	£	108,622.66
Minavil House, Rosemont Road, Wembley, HA0 4PZ	Alperton	16/2629	Transport	CPZ Contribution	£	176,775.86
330 Ealing Road, Wembley, HA0 4LL	Alperton	20/3914	Transport	CPZ Contribution	£	29,556.43
Keelers Service Centre, Harrow Road, Wembley, HA0 2LL	Sudbury	18/3069	Transport	CPZ Contribution	£	19,288.66
Land adjacent to Northwick Park Hospital, Nightingale Avenue, London, HA1 3GX	Northwick Park	20/0701	Transport	CPZ Contribution	£	239,743.59
Wembley Park Station Car Park and Train Crew Centre, Brook Avenue, Wembley	Preston	20/0967	Transport	CPZ Contribution	£	115,480.77
Wembley Park Station Car Park and Train Crew Centre, Brook Avenue, Wembley	Preston	20/0967	Transport	For the delivery of 12 Temporary Blue Badge Parking Bays that cannot be retained on the land	£	115,480.77
Building 15, Dollis Hill Estate, Brook Road, NW2	Dollis Hill	10/1712	Transport	Off-site signange & transport infrastructure assoc. w/Menorah girls School	£	16,678.21
CENTRAL SQUARE, Central Square, Wembley, HA9	Wembley Central	03/3765	Transport	Taxi Rank Contributions to be applied in the event of receipt towards the provisions of a taxi rank within the vicinity of the development	£	15,000.00
Chalk Hill Health Centre, Chalk Hill Road, Wembley, HA9 9BQ	Barnhill	05/0968	Transport	Towards the implementation and first two years operating costs of a car sharing scheme.	£	20,212.92
Public Convenience opposite Kenmont Garden, Harrow Road, London	Kensal Green	14/3690	Transport	Towards the relocation of the advertising board currently situate outside the premises to the Land to a new location (to be agreed in writing with the Council) and JC Decaux being the owners of the advertising board	£	7,000.00
Garages rear of 77-80, Riverside Gardens, Wembley	Alperton	12/1301	Transport	Towards widening Riverside Gardens	£	5,500.00
186 Church Road Upper Floor, NW10 9NP	Dudden Hill	.12/3037	Transport or Recreation	Sustainable transport in the local area or open space in the area	£	0.49
Kelaty House, First Way, Wembley, HA9 0JD	Tokyngton	12/1293	Unique	Towards fitting out the community unit provided on site as shown on plan 3	£	50,000.00
					£	7,212,112.64

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 Brent	Resources & Public Realm Scrutiny Committee 5 November 2024
	Report from the Corporate Director of Finance and Resources
	Lead Member – Deputy Leader & Cabinet Member for Finance & Resources (Councillor Mili Patel)
Quarter 2 Financial Forecast 2024/25	

Wards Affected:	All
Key or Non-Key Decision:	Non Applicable
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:	Two: Appendix A: Savings Delivery Tracker Appendix B: Prudential Indicators
Background Papers:	N/A
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Minesh Patel, Corporate Director of Finance & Resources Tel: 020 8937 4043 Email: Minesh.Patel@Brent.gov.uk

1.1 Executive Summary

1.2 This report sets out the financial forecast for the General Fund revenue budget, the Housing Revenue Account, the Dedicated Schools Grant and the Capital Programme, as at Quarter 2 2024/25.

1.3 The Council’s revised General Fund revenue budget for 2024/25 is £386.7m. There is a forecast overspend of £14.4m against the revenue budget at quarter two. If sustained until the year end, this would require a transfer from unallocated reserves. Equally, any overspend not dealt with in 2024/25 could potentially carry over into following year, therefore increasing the requirement for further savings whilst at the same time depleting the Council’s reserves. The Council is taking a number of mitigating actions,

including continuing to implement spending controls, in order to contain identified pressures. The current budget also reflects £8m of savings that are set out in Appendix A.

1.4 There are also potential budget pressures being reported within the Housing Revenue Account as a result of considerable savings being required following rent limitations imposed by central government in previous years and increased demand and costs associated with repairs. Further details are set out in section 5. The Dedicated Schools Grant is reporting a £0.4m overspend, however there remains a legacy deficit of £15.1m that presents a significant risk. Further details are set out in section 4. There is significant risk within the delivery of the Capital Programme due to the complex nature of the projects within it which may result in slippage. Further details can be found in section 6.

1.5 The tables below show the forecast position against budget for the General Fund, Dedicated Schools Grant and Housing Revenue Account.

	Budget	Forecast	Overspend / (Underspend)
	£m	£m	£m
Community, Health and Wellbeing	156.3	154.2	(2.1)
Children and Young People	91.0	90.5	(0.5)
Neighbourhoods and Regeneration	29.4	28.4	(1.0)
Law and Governance	13.8	13.4	(0.4)
Finance and Resources	17.2	16.6	(0.6)
Partnerships, Housing and Resident Services	38.8	52.8	14.0
Subtotal Service Area Budgets	346.5	355.9	9.4
Central Budgets	40.2	45.2	5.0
Total Budget Requirement	386.7	401.1	14.4
Funding	(386.7)	(386.7)	0.0
Grand Total General Fund Budgets	0.0	14.4	14.4
DSG Funded Activity	0.0	0.4	0.4
Housing Revenue Account (HRA)	0.0	0.0	0.0
Net Total*	0.0	14.8	14.8**

*DSG and HRA budgets have been presented as net figures in the table above. Gross income and expenditure budgets for the DSG and HRA are shown below.

**In-year forecasts are inclusive of the in-year savings as discussed in section 1.16

DSG gross income and expenditure			
	Budget	Forecast	Overspend / (Underspend)
	£m	£m	£m
DSG			
Income	(235.9)	(235.9)	0.0
Expenditure	235.9	236.3	0.4
Total	0.0	0.4	0.4

HRA gross income and expenditure			
	Budget	Forecast	Overspend/ (Underspend)
	£m	£m	£m
HRA			
Income	(65.9)	(65.9)	0.0
Expenditure	65.9	65.9	0.0
Total	0.0	0.0	0.0

1.6 The table below shows the current forecast against the revised budget for the Capital Programme for 2024/25.

Directorate	Original Budget	Revised Budget	Current Forecast	FY Variance		
				£m	£m	£m
	£m	£m	£m	(Underspend) / Overspend	(Slippage) / Brought Forward	Variance Total
Corporate Landlord	14.2	17.2	16.2	(0.1)	(0.8)	(0.9)
Housing GF	59.8	62.7	61.4	0.6	(1.9)	(1.3)
Housing HRA	57.3	53.7	52.2	1.9	(3.4)	(1.5)
PRS I4B	46.3	46.2	20.5	0.0	(25.7)	(25.7)
Public Realm	23.8	25.4	24.5	0.5	(1.4)	(0.9)
Regeneration	64.7	65.8	64.3	(0.6)	(1.0)	(1.4)
Schools	24.7	25.5	20.1	(0.4)	(5.0)	(5.4)
South Kilburn	27.2	33.4	33.7	0.3	0.0	0.3
St Raphael's	0.3	0.5	0.5	0.0	0.0	0.0
Total	318.3	330.4	293.5	2.2	(39.3)	(36.9)

Current Economic Environment

- 1.7 The current economic environment is volatile and uncertain with high interest rates designed to curb high inflation seen since 2021. This particularly impacted energy costs and exacerbated the cost-of-living crisis.
- 1.8 Consumer Price Index (CPI) inflation returned to the Bank of England target of 2% in May 2024, for the first time since July 2021, before rising slightly again to 2.2%. In its March 2024 economic and fiscal Outlook report, the Office for Budget Responsibility forecast that inflation will average at 2.2% this year and 1.5% in 2025 before gradually returning to the Bank of England target level of 2% in 2028.
- 1.9 However, it is important to note that this lower level of inflation is now being applied to prices that are more than 20% higher on average than they were three years ago, more than triple the increase that would have occurred if inflation had remained at the target. This continues to make the economic environment challenging for Brent Council and its residents and businesses.
- 1.10 On 31 July 2024, at the meeting of the Monetary Policy Committee, The Bank of England reduced the base interest rate by 0.25 percentage points to 5.0%. This was the first reduction in the base rate since 14 consecutive increases between December 2021 and August 2023. Future policy decisions are dependent upon UK economic data with the Bank monitoring both inflation and employment. These factors create a challenging environment for the Council to plan its future resourcing requirements.

Maintaining Financial Control

- 1.11 Local government is facing the most challenging financial environment for many decades. Many councils are overspending and depleting their reserves, most are experiencing the adverse effects of a prolonged period of high inflation, high interest rates and significant increases in demand due to demographic changes. Some are even declaring bankruptcy by issuing Section 114 notices. Concerns about future levels of government funding are widespread. Against this backdrop, Brent has maintained a strong position in terms of financial resilience and sustainability with a good track record of delivering savings and balancing the overall budget. However, in 2023/24 the Council overspent its revenue budget by £14m and is forecast to overspend again in 2024/25.
- 1.12 Despite the considerable efforts of the Council to manage its position, the operating environment and wider economic context continues to be volatile with small changes in demand disproportionately materialising in large financial pressures. These are particularly in Children's social care and Adult

social care packages in terms of volumes and complexities, and temporary accommodation volumes, costs of provision and loss of Housing Benefit subsidy from central government. The Council is also dealing with the impact of rising costs due to continued high level of provider inflationary pressures, and the impact of the cost-of-living crisis which also affects important income streams of the Council.

- 1.13 Since the Quarter 1 forecast report was presented to Cabinet in July 2024, the financial position has worsened. The forecast overspend in the Housing service, which is experiencing high levels of demand due to a rise in homelessness and a reduction in the supply of suitable temporary accommodation, has increased from £10m to £15m. Additionally, a new pressure of £5m has been identified against 'Supported Exempt Accommodation'. These pressures are being partially offset by £6m of in year savings required to delivered across other services, but have resulted in another forecast £14m overspend in 2024/25. Section 3.6.6 of this report sets out the Council's strategy in dealing with the significant increase in the cost of providing temporary accommodation for those homeless people to whom the Council owe a legal duty.
- 1.14 The introduction of spending controls and the Budget Assurance Panel in 2023 helped to facilitate better grip of the Council's financial position and stabilise the in year overspend. This introduced a range of measures including proactive vacancy management, directorate led targeted non-essential spending control including agency and interim spend, alongside department led management action plans reflecting other actions being undertaken. These sensible, proactive and prudent measures are estimated to have led to cost avoidance of c£3m across the Council and are providing more assurance over the Council's spending decisions.
- 1.15 While Brent is not currently in the financial situation of those Councils that have recently issued, or threatened to issue, a Section 114 notice (legally required when the council cannot balance its budget, unlike the NHS and other parts of the public sector, councils are not allowed to carry a deficit) all efforts must be focused on positively changing the financial position. For Brent, the current forecast overspend represents approximately 4% of our net revenue budget. This is close to the level of 5% that the Council decided should be held as generally usable reserves at the time of setting the 2024/25 budget and without the in year savings required to be delivered by services, this threshold would have been reached.
- 1.16 Given the current forecasted overspend, these spending controls will continue throughout 2024/25. However, it is clear that further actions are now necessary, including a new requirement for services to deliver £10m of in year savings in addition to the £8m of savings already being delivered during 2024/25. Identifying and delivering this level of additional savings will be a

significant challenge for the Council's services during the coming months, but this is considered to be a necessary step to ensure that the Council's budget can be returned to a sustainable position. The Q2 forecast reflects where departments are in the identification and delivery of these new in year savings targets, which will continue to focus on rigorous spending controls, reviewing staffing levels, increasing income, as well as using new technology to transform services and reduce overheads. Council officers and members will continue to work hard to minimise the impact on residents and provide the highest possible quality of service within the current resource constraints.

1.17 A further update on the overall financial position over the medium term will be provided in the draft budget for 2025/26, which will be brought to Cabinet in November 2024.

2.0 Recommendation(s)

2.1 That the Resources & Public Realm Scrutiny Committee note the new grant funding received in year, the overall financial position and the actions being taken to manage the issues arising.

2.2 That the Resources & Public Realm Scrutiny Committee note the savings delivery tracker in Appendix A.

2.3 That the Resources & Public Realm Scrutiny Committee note the prudential indicators for treasury management in Appendix B.

3.0 Revenue Detail

3.1 Community, Health and Wellbeing

Community, Health and Wellbeing	Budget (£m)	Forecast (£m)	Overspend / (Underspend) (£m)
Adult Social Care	84.7	82.1	(2.6)
Strategic Commissioning & Capacity Building	45.8	45.9	0.1
Public Health	24.2	24.2	0.0
Leisure	1.5	1.9	0.4
Integrated Health Partnerships	0.1	0.1	0.0
Total	156.3	154.2	(2.1)

Summary

3.1.1 The Community, Health and Wellbeing (CHW) department is currently forecasting an overall underspend of (£2.1m), which is a movement from the

Quarter 1 breakeven position mainly due to the requirement to identify in year savings currently forecast to be (£2.6m). The underspend is mitigating a £0.4m pressure against the Leisure budgets arising from the Bridge Park Leisure Centre and Vale Farm and a slippage against saving CHW01 of £0.1m against technology enabled care.

- 3.1.2 As set out in section 1.16, the directorate needs to identify further in year savings of c£3.9m in order to contribute to the overall £10m in year savings target. At this stage it is anticipated that some of the savings that were previously agreed to be delivered in 2025/26, can be brought forward and delivered early. In addition, the impact of the changes to the charging policy that was implemented earlier this year has been factored into the forecast.
- 3.1.3 The section below provides further details of the areas and risks which may further impact on the forecast position going forward.

Risks and uncertainties

- 3.1.4 There remains a number of risks and uncertainties which could impact on the budgets within the CHW department. These include the following:
 - 3.1.5 There is a forecast pressure of £0.1m against Strategic Commissioning budgets. This is due to the slippage of a £0.1m saving which was expected to be generated through technology enabled care (CHW01). It is unlikely this will materialise into realisable savings this year as the project is still in the scoping phase.
 - 3.1.6 Demographic changes could put pressure on existing systems and budgets if the trend of rising number of clients using social care services in Brent continues. Since the 31 March 2024, the average number of weekly service users has increased by 231. This is an increase of 5%, an average of 1% per month. If this trend continues, there could be 4,878 service users by March 2025. The trend of client numbers will be monitored so that any pressures can be identified and managed. In addition to demand pressures, the average weekly cost has increased by 2% since the 31 March 2024. This combination of increased demographic and inflationary pressures, above which has already been budgeted for, could add to the existing budget pressure.
 - 3.1.7 Regarding complex cases, it remains a challenge that an increasing number of clients are presenting with more complex health and social care needs, requiring additional resources and more specialised staff. There is a risk of additional costs due to difficulties in managing complex cases and the need for detailed assessments and personalised care plans, such as one-to-one support in a residential / nursing placement which costs £1,299/ £1,177 per week respectively.

- 3.1.8 The risk remains that nationally, the adult social care sector has consistently faced challenges with recruitment and retention, with high staff turnover and vacancy rates. Also, the shortage of qualified staff can have detrimental effects on the care provided to adult service users and added stress on existing staff. The national shortage of care workers has changed the workforce model across social care leading to a reliance on agency staff that are more costly compared to permanent staff. Management continues to focus on agency to permanent conversions as part of its workforce planning strategy and to maintain stability for the clients.
- 3.1.9 Supporting the Care Market could also place pressures on the budget as there are risks related to the sustainability of private care providers and the need to ensure the care market has sufficient capacity to meet demand. There is also the need to support care providers through fair contracts and financial assistance to ensure continuity of services and care quality.
- 3.1.10 To manage demand, the service continues to focus on prevention through continuing work with the Partnerships, Housing and Resident Services directorate, providing advice and ensuring that only those who are eligible access council funded services, including ensuring appropriate referrals to the NHS for Continuing Health Care and appropriate reviews of aftercare provision under Section 117 of the Mental Health Act 1983. The valuable role of carers is also recognised, and the Directorate is working hard to ensure that carers are well supported. Brent's commitment to carers is outlined in the new co-produced carers strategy and the services focus on strength-based practice to promote independence and aid people to remain supported within their community.
- 3.1.11 There is currently a review of the 'Better Care Fund' being undertaken by the North West London Integrated Care System (ICS) with the aim to have clear sight of all spend, activity & impact of BCF schemes in order to assess their value in achieving whole system aims, and to develop consistency across ICS. There is therefore a risk that if a decision is made to revise commissioned services this could mean some in year changes during 24/25. A revised BCF which takes full account of the outcomes of the review will be agreed by 30 September 2024 and in place for April 2025 following due governance processes including approval by Health & Wellbeing Boards (both approval of the outcomes of the review and the proposed allocations) and consideration through Councils' Scrutiny process. The current size of Brent's BCF, including Local Authority & Health funding, for 2024/25 is £55m.

Public Health

- 3.1.12 The Public Health grant is currently forecast to breakeven. Contracts have been affected by the rising levels of inflation. Most public health services are commissioned from the NHS where the national Agenda for Change (AfC) and medical pay awards have significantly outstripped uplifts in the Public Health grant. While the Department of Health and Social Care (DHSC) has allocated an additional AfC supplement of £0.3m to help fund these pressures, there remains a shortfall against the actual costs which will be incurred. In previous years, the council has managed to keep in year expenditure below the total grant, allowing the service to maintain a reserve. This was a prudent response to the year-on-year decline in the real-time reduction in the value of grant and to prior in year reductions. Funding from the reserve will be drawn down to manage these pressures and continue to deliver vital services.
- 3.1.13 Public health spend activity against the additional grants, Supplementary Substance Misuse Treatment and Recovery Grant (SSMTRG), Rough Sleepers Drug and Alcohol Treatment Grant (RSDATG), Stop Smoking Grant and the Start for Life Grants, are all on track and in line with the outcomes that have been set out within the respective guidelines. Funding for these grants, except for the Stop Smoking grant, is not currently guaranteed beyond 2024/25. The SSMTRG and RSDATG have allowed significant expansion of the local treatment offer with improved outcomes. While OHID has given positive indications of at least one more year of funding, the service is developing a contingency plan to utilise the public health reserve to maintain the outcomes in 2025/26.
- 3.1.14 Sexual Health services are under increasing pressure to deliver due to the increasing Sexually Transmitted infection (STI) rates including emerging infections and increased clinical complexity including antimicrobial resistance. The service is exploring with providers the potential to expand the online offer to meet this increased need at the lowest cost.

Leisure

- 3.1.15 The Leisure service relies on income generation, and any shortfall in expected demand, or unexpected increases in cost, could lead to financial difficulties. There is currently a forecast pressure of £0.4m in 2024/25 largely as a result of pressures at Bridge Park Community Leisure Centre of £0.2m and Vale Farm £0.2m. The council is working to identify a more sustainable approach to managing income fluctuations and funding the rising costs of operating the service.
- 3.1.16 The increasing running and maintenance at Bridge Park Community Leisure Centre is leading to pressures on the budget. Although the fees for some services have increased, it is not sufficient to cover the rising costs of staffing,

cleaning, security, repairs and maintenance. The service is trying to mitigate this by identifying ways to increase income through renting office space and reduce costs through effective contract negotiations.

3.1.17 The Leisure service provision at Vale Farm Sports Centre is delivered through a Tri Borough contract with Ealing, Brent and Harrow. In order to mitigate the impact of increasing costs of utilities and other goods and services, the council has offered a reduced management fee income, a pressure has therefore arisen due to the shortfall in income of £0.2m. Both Ealing and Harrow Borough are making a similar contribution to support the service.

3.1.18 The indexed unitary charges and rising utility costs at Willesden Sports Centre are placing considerable strain on the budget. A smoothing reserve of £1m is available to manage the fluctuating cash flows over time, but it is anticipated that most of this will be spent in 2024/25. The current forecast assumes a £0.8m drawdown from reserves. The council is collaborating with leisure providers to ensure the continued provision of an affordable service that does not depend on temporary reserves.

Savings and Slippages

3.1.19 The department has a savings target of £0.8m to deliver in 2024/25. Most of the savings are on track to be delivered, however, savings target CHW01 – technology enabled care (£0.1m) will be delayed as work required in determining an approach to deliver the saving is still underway.

Summary of Key Assumptions

3.1.20 The table below summaries the main assumptions made in the CHW forecast.

Key Assumption	Downside if worse	Upside if better	Mitigations
Adult Social Care providers' costs will increase to the anticipated level in line with inflationary assumptions.	A 1% increase over and above budgeted levels on the cost of care packages could result in a £1m pressure	A 1% decrease on the cost of care packages could result in a £1m reduction in anticipated costs.	The Council is working closely with the service providers and provides robust challenge of individual package costs based on evidence as part of placement reviews.
Client numbers and unit costs stay within the forecast range	Additional budget pressures should there be clients beyond	Client numbers falling below those forecasted	The Council are monitoring both client numbers and package costs for each service. This

	those predicted in the forecast	would reduce costs	should allow for early identification of pressures so mitigating actions can be taken.
Leisure - Utility costs to stay within the expected forecast	Additional pressure on the leisure reserves	Reduced pressure on the reserves	Service is monitoring activity and pricing to ensure are updated and reflected in a timely and accurate way.

3.2 Children and Young People (CYP) (General Fund)

CYP Department	Budget (£m)	Forecast (£m)	Overspend / (Underspend) (£m)
Central Management	4.0	4.0	0.0
Early Help	5.5	5.4	(0.1)
Inclusion	2.9	2.9	0.0
Localities	24.2	23.9	(0.3)
Looked After Children and Permanency	7.4	7.3	(0.1)
Forward Planning, Performance & Partnerships	44.7	44.7	0.0
Safeguarding and Quality Assurance	2.2	2.2	0.0
Setting and School Effectiveness	0.1	0.1	0.0
Total	91.0	90.5	(0.5)

Summary

- 3.2.1 The CYP directorate is forecasting an underspend of £0.5m at the end of Quarter 2. However, there are risks and uncertainties discussed below which may impact this position going forward.
- 3.2.2 The challenges typically faced by the directorate are largely due to rising demand and volatility of care packages and placement costs; recruitment and retention challenges which have led to a reliance on qualified social worker agency staff; increasing number of children with complex needs requiring Education, Health and Care Plans (EHCP) and the impact of rising inflation driving increased costs of services. Therefore, ongoing actions are being undertaken by the directorate to control spend within the funding envelope available.

3.2.3 The budget for SEN Transport transferred to CYP at the beginning of the financial year. The budget also covers transport services for adults with social care needs. Pressures are expected mainly from the taxi service to transport children and young people with SEN who cannot be transported by more cost-effective modes of transport. A new Travel Assistance Policy for CYP aged 0-25 in Education was approved by Cabinet in June 2024 and will begin to be implemented this financial year. However, the financial impact of the new policy is unlikely to be seen until 2025/26 onwards. The department is reviewing the service to identify areas where in year savings could be achieved against this budget.

Forecast

3.2.4 The Forward Planning, Performance and Partnership service demand led budgets have seen the following increases in this financial year:

- On average, a 2% increase in residential placement prices, although numbers have remained stable this year with 32 placements. On the other hand, there has been a 13% decrease in the number of CYP children placed in independent fostering agencies (IFAs) compared to the last financial year, in line with the fall in the number of Looked After Children.
- The semi-independent provision supporting care leavers budget, has seen an overall 1.63% increase in numbers compared to 2023/24. Currently around 18% of the care leavers in semi-independent provision are Unaccompanied Asylum-Seeking Children (UASC).
- The forecast is also dependent on income from the Home Office for UASC and leaving care grants, contributions from health and housing benefits income.

3.2.5 The Localities service which includes the Children with Disabilities (CWD) demand led care packages budgets i.e. Direct Payments, Care at Home, Residential and Day Services has seen the number of supported clients rise by 5% since March 2024. A cost driver in this area is the increasing number of Education, Health, and Care Plans (EHCPs) which is also affecting the High Needs Block of the Dedicated Schools Grant (DSG). Care packages are also seeing significant price increases including 5% increases in Care at Home and 10% in Direct Payments. The Localities and the Looked After Children and Permanency services are also reliant on the need to use agency social workers to cover vacant positions.

3.2.6 To manage these pressures, a CYP Strategic Placements Commissioning Group chaired by the Corporate Director for CYP has been put in place to oversee the development of two workstreams:

- Growing Brent’s in-house foster care provision by developing a new and competitive package for in-house carers and reducing the requirement to use more expensive Independent Fostering Agencies (IFAs).
 - Promoting greater independence for care-experienced young people thereby reducing placement spend and the number of care-experienced young people in paid for accommodation through a system-wide approach that supports young people transitioning to independence (e.g., working with the Housing department to enable tenancy sustainment, ensuring care leavers claim Housing Benefit when entitled with the aim of reducing the impact on the placements’ budgets).
- 3.2.7 CYP management continue to take steps to improve recruitment and retention of social workers including several recruitment drives, a weekly Establishment Board created to scrutinise all agency recruitment, and corresponding activity to achieve permanency through conversations with agency staff to convert to permanent roles.

Risks and Uncertainties

- 3.2.8 The main risks and uncertainties impacting on the CYP directorate stem from inflationary pressures resulting in increased costs from private providers of fostering, semi-independent and residential accommodation for looked after children.
- 3.2.9 The SEN transport service is a demand-led budget and increases in the number of children needing Education, Health and Care Plans (EHCPs) could put additional pressures on this budget. Furthermore, there could be inflationary and market pressures which could impact on taxis, fuel and other running costs and thereby exacerbating the pressure to achieve the expected savings for this financial year.
- 3.2.10 Recruitment and retention of skilled and experienced social work staff continues to be a risk in Localities and Looked After Children, and Permanency (LAC&P) services with agency staff occupying up to 50% of the workforce in some teams.
- 3.2.11 The volatility surrounding the placements budget for looked after children (LAC) is a key challenge. If demand for residential placements increases, this will increase the financial pressure as an individual high cost residential or secure placement can cost over £0.5m per annum.
- 3.2.12 Ofsted has introduced regulation of the 16/17-year-old placement market. This new approach, alongside a testing inspection framework for children’s residential homes may cause a risk of a reduction in the number of homes available from providers, causing higher demand and higher costs for local authorities competing for the same places. In response, Brent has been successful in a DfE bid to build and run a children’s home, which will help

manage costs and improve placement sufficiency. The home is expected to open in April/May 2025.

- 3.2.13 The Children with Disabilities budget within the Localities service funds the social care cost element for many children with an EHCP. There remains a risk that further increases in EHCPs will put additional pressure on the care packages budgets in this area and impact on staffing costs. The average cost of supporting a new CWD client can range between £33K to £8K (Direct Payment). These are average costs, some of the most expensive packages can be substantially higher.
- 3.2.14 A lack of full, agreed cost sharing for children's care packages at an Integrated Care Board level for CYP Placements and Children with Disabilities remain a high risk for the department, particularly in events where placement charges are disputed.
- 3.2.15 The forecast position is also dependent on estimated income from the Home Office for UASC and Care leavers (£2.8M) and health contributions from the ICB (£1.66m). Any major fluctuations against these income streams could impact on the outturn position.
- 3.2.16 Currently young people are being successfully prepared for independence to have their own tenancy. However, the current housing crisis is placing significant pressure on the Council's housing stock. This means young people have to wait for a social tenancy to become available during which time they remain in accommodation funded from CYP budgets. To mitigate this, a Brent Shared House model is being tested which will result in lower accommodation costs compared to relatively higher average placement costs.
- 3.2.17 Mitigating factors include the development of the new in-house children's home which is expected to open later in this financial year and reduce the need to use costly independent providers. Brent is part of a pan-London vehicle to ensure greater sufficiency of secure welfare residential placements which will be operational in 2025.
- 3.2.18 The Placements Commissioning Strategic Group has focused on two workstreams aimed at reducing financial pressures: "Growing the In-house Fostering Service" (To increase the number of in-house Brent Foster Carers to reduce the reliance on higher cost IFAs) and "Promoting Care Leavers Independence" (A review of Brent's support for care leavers to promote independence to achieve financial savings). A key risk is the pipeline of care leavers waiting for permanent secured tenancy, in line with the Council's agreed offer to care leavers.

Savings and Slippages

- 3.2.19 The directorate has a £1.9m savings target to deliver in 2024/25. There are also savings of £1.2m against the SEND Transport budget, however, this has

now been deferred to 2025/26 following the implementation of the new Travel Assistance Policy.

- 3.2.20 There are savings from reductions in care packages of £0.86m, staffing efficiencies of £0.51m, £0.376m arising from contract and other miscellaneous items and £0.2m from “service transformation/digital” savings. The digital savings remain a risk as not all of the £0.2m has yet been identified. Implementation of changes will involve support as part of the Council’s wider Digital Programme. The rest of the savings are on track to be delivered, and any risk of slippage will be managed by the department.
- 3.2.21 As part of the requirement to deliver £3m in year savings to address the challenging financial situation the Council is facing, the directorate has reviewed some of the savings previously planned for 2025/26 with the potential to bring these forward into the current financial year. As of July 2024, the directorate has identified c£0.5m worth of savings that could be achieved, and these have been included in the reported forecast. Identifying and delivering the full level of additional savings will be a significant challenge for the directorate, given the inherent pressures against the CYP budgets, particularly placements which tend to be costly, volatile and unpredictable. Theoretically, to find the required balance of £2.5m by the end of the financial year, given the limited time to implement any structural changes, would require a major reduction in agency staff and placements spend. However, this would increase caseloads for remaining staff and significantly increase a number of risks, many related to safeguarding, which would be extremely challenging for the directorate to manage effectively. The directorate is scrutinising all aspects of discretionary spend to identify where greater impact can be seen to deliver the total £3m in year savings in this financial year.

Summary of Key Assumptions

3.2.22 The table below summaries the main assumptions made in the CYP forecast.

Key Assumption	Downside if worse	Upside if better	Mitigations
LAC and Care Leaver placements forecast assumes numbers of 799 FTEs and unit costs reflect current trends	An increase in the number of high cost residential or secure placements would place additional pressure on the budget. e.g., an	Increased step-down arrangements result in falling number of residential placements. A single stepdown from a residential placement to a	Ongoing review of packages for best outcomes and focus on stepdown arrangements to support children to transition from residential to foster and/or semi-independent placements.

	increase by 4 placements in year could cause an additional in-year pressure of c£0.5m (and £2m per annum).	semi-independent placement could reduce expenditure by c£0.2m in-year	Supporting the transition of care leavers to their own tenancies, to improve outcomes and independence. Innovative support and partnering with Health for CYP Mental Health and Wellbeing, among other preventative measures.
CWD placements forecast assume numbers of 684 and packages & unit costs reflect current trends	An increase in the number of packages would place pressure on the budget.		Rigorous gate keeping of care packages. Enhanced clawback arrangements.
Health contributions for CYP placements and Children with Disabilities (CWD) packages will be lower than the 2023/24 levels.	spend will not be mitigated by these contributions in proportion to the overall demand.	It will assist in mitigating overall net spend.	Maximising joint funding approaches with health to ensure contributions to placement costs where applicable. Targeted activity across ICS to ensure consistency in Continuing Health Care funding.
Mix of social work staff and caseloads in the Localities and LAC & Permanency service to include the use of agency staff at a similar level than 2023/24.	If increases of 15% during the year, there could be up to £0.4m additional spend on agency social work staff to manage the pressure.	There would be a reduction in the use of agency staff and the reduced caseloads could be attractive to social workers seeking permanent roles.	Continued management action to monitor caseloads across the service and review and manage social work resources and incentives. New/more targeted recruitment campaign
Assume numbers of SEN clients requiring transport do not	An increase in the numbers would place pressure on the budget	Reduction of the expected overspend	Transformation programme is reviewing options to achieve savings and avoid costs

increase significantly			
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3.3 Neighbourhoods and Regeneration

Neighbourhoods and Regeneration	Budget (£m)	Forecast (£m)	Overspend / (Underspend) (£m)
Public Realm	26.3	25.5	(0.8)
Strategic Housing	1.9	1.9	0.0
Inclusive Regeneration & Employment	1.2	1.0	(0.2)
Total	29.4	28.4	(1.0)

Summary

- 3.3.1 Neighbourhoods and Regeneration Directorate are currently forecasting an underspend of £1.0m at Q2. This underspend is a result of in year savings implemented to assist the Council with forecast budget pressures.
- 3.3.2 The service is expecting to generate more income from the parking service, based on forecast PCN income. Smaller savings come from bringing forward voluntary redundancy dates, and minor restructures related to this.

Risks and uncertainties

- 3.3.3 Within Inclusive Regeneration & Employment, pressures reported on income generated by Building Control and Planning remain.
- 3.3.4 Increased interest rates and material costs have seen cancellation or scaling back of some major developments, which has affected the ability of Building Control to generate the fee income that it has collected historically. The Health and Safety Executive (HSE) high-rise building regulations were introduced in October 2023, which meant a switch to a cost recovery basis for charging. In addition, almost all major project work is assigned to Local Authorities by the BSR (Building Safety Regulator) which has taken away the department's ability to bid for further work. The department is working to mitigate the effect of these factors.
- 3.3.5 Within Planning and Development Services, application and pre-application fee income has seen a decline in recent years. This reduction in income is not exclusive to Brent and has been the case across the country. This was managed in 2023/24 due to an implementation of fee increases in December 2023, which is currently estimated to be sufficient to prevent any pressures in 2024/25.

- 3.3.6 For Public Realm the new contractual arrangements for a number of key services such as parking and waste management, commenced in 2023/24. These continue to be closely monitored as the contracts become embedded.
- 3.3.7 Within the new waste contract there is close monitoring of recycling tonnage and market prices to ensure they align with the predicted figures for the contract. It was anticipated the new service would face some pressure in the first few years, and as such an earmarked reserve was created to smooth any financial impacts between years. £1m from the reserve was factored into the RLS finance model for 2024/25 and the remainder will be utilised by next year.

Savings and Slippages

- 3.3.8 Savings for 2024/25 were set under the Council's previous structure. Following the senior leadership realignment, savings have been realigned and £1.2m of savings are attributable to the new Neighbourhoods and Regeneration department.
- 3.3.9 At Quarter 2 there are no reported issues, and all savings are expected to be delivered in year.
- 3.3.10 The table below summaries the main assumptions made in the N&R forecast.

Summary of Key Assumptions

Key Assumption	Downside if worse	Upside if better	Mitigations
That newly implemented in-year savings can be achieved. This also assumes that the service would otherwise have broken even.	If the savings are not achieved, it will put pressure on the Council's overall budget.	There are significant pressures on the Council's overall budget, so if further savings are achieved to will go towards alleviating this.	Work has already begun to achieve the savings. Some are straightforward, such as holding vacancies and therefore already achieved.

Building Control is able to mitigate pressure on its income generation.	In 23/24 the department reported a £600k overspend, without mitigation the same could occur	The department is able to generate more income providing additional revenue to the Council	Cases arriving through the BSR are being closely monitored to ensure accurate forecasting. A reserve was created in 2023/24 to mitigate pressures whilst a longer term plan is implemented.
The new waste contract is still embedding and recycling performance will improve	The full reserve could be utilised and pressures spread into future years.	The reserve balance is not fully used and is available to repurpose and utilise for other pressures	The monthly data around tonnage, rejections and market prices for recycling are closely monitored. With ongoing work to improve recycling performance.

3.4 Law and Governance

Law and Governance	Budget (£m)	Forecast (£m)	Overspend / (Underspend) (£m)
Legal Services	5.3	5.3	0.0
HR & Organisational Development	3.5	3.1	(0.4)
Democratic Services	4.1	4.1	0.0
Total	13.8	13.4	(0.4)

Summary

- 3.4.1 The Law & Governance Directorate are forecasting to underspend by £0.4m in 2024/25.
- 3.4.2 The underspend is a result of implementing in year savings measures to contribute to the overall £10m in year savings target. These come largely from reviewing savings previously agreed for 2025/26, and where possible bringing these forward. This includes holding posts vacant, reducing subscriptions and releasing the corporate training budget that is not committed.

Risks and uncertainties

- 3.4.3 Although the department is forecasting a small underspend there are some pressures which present a risk to this forecast within Legal Services.
- 3.4.4 Legal services are currently using temporary staff to cover critical positions in the department which are vacant. There is a risk to the staffing budget if the department is unable to permanently recruit to these. A recruitment campaign is planned to mitigate this risk.
- 3.4.5 Additionally, the department is experiencing budget pressures due to increases in Barrister fees since the start of the year when a new Framework was procured through the London Boroughs Legal Alliance. The new rates are generally advantageous compared to rates available outside that framework but are higher than under the previous framework. The service is seeking to mitigate this by close controls over instruction of barristers and by increasing advocacy capacity internally.

Savings and Slippages

- 3.4.6 Under the new Council structure £0.3m of 2024/25 savings are attributable to Law & Governance. At Quarter 1 there are no reported issues, and all savings are expected to be delivered in year.

3.5 Finance and Resources

Finance and Resources	Budget (£m)	Forecast (£m)	Overspend / (Underspend) (£m)
Finance	5.2	5.2	0.0
Organisational Assurance & Resilience	4.2	4.2	0.0
Shared Technology Services	0.0	0.0	0.0
Property & Assets	7.8	7.2	(0.6)
Total	17.2	16.6	(0.6)

Summary

- 3.5.1 Finance and Resources are currently forecasting to underspend by £0.6m in 2024/25.
- 3.5.2 Shared Technology Services has a net zero budget as it recharges all its costs to the member councils, including the Brent client service within Partnerships, Housing and Resident Services.

Property & Assets

- 3.5.3 Property and Assets are required to find new tenants to replace expired leases and vacant property to meet income forecast. The service is working to mitigate this risk by actively marketing these properties and working with agents where appropriate.
- 3.5.4 Based on the current forecasts of energy prices from the Council's energy supplier, which is based on the contracts they have already bought for future energy supply, Property & Assets are expecting energy costs to the council to fall in October. The current estimate is an underspend of £0.6m.

Savings and Slippage

- 3.5.5 A total of £1.1m in savings is planned through staff reductions, digital transformation, leasing additional floors of the Civic Centre, streamlining Facilities Management services, maximising income potential from Council assets, and other departmental efficiencies.

3.6 Partnerships, Housing and Resident Services

Partnerships, Housing and Resident Services	Budget (£m)	Forecast (£m)	Overspend / (Underspend) (£m)
Communications Insight and Innovation	15.5	15.0	(0.5)
Communities & Partnerships	4.1	4.0	(0.1)
Housing Needs & Support	2.2	17.4	15.2
Private Housing Services	0.3	0.2	(0.1)
Residents Services	14.8	14.3	(0.5)
Housing & Resident Services Corporate Director	1.9	1.9	0.0
Total	38.8	52.8	14.0

Summary

- 3.6.1 The Partnerships, Housing and Resident Services Directorate is forecasting a possible budgetary pressure for 2024/25, which could amount to £14.0m and is directly attributable to the high level of pressures in the Housing Needs and Support service, partially reduced by in year saving measures across other service areas within the department. In year saving measures amounting to £1.2m contribute to the overall £10m savings target and are largely achievable as a result of holding vacant posts, generating additional

income and reviewing opportunities to postpone expenditure plans in the short term.

- 3.6.2 The department continues to take a number of actions to support Brent residents and businesses and mitigate the impact of the cost-of-living crisis.
- 3.6.3 The Household Support Fund (HSF) grant has been extended for 12 months, until 31 March 2025, to support residents through the cost-of-living crisis. The initial grant, to be spent between April and September 2024, was £2.8m. The second tranche of funding, to be spent between October 2024 and March 2025 has not yet been announced but is estimated to be in the region of £2.3m. This is anticipated to be utilised to continue to support households receiving free school meals, Care Leavers, Disabled households on Housing Benefits, Credit Union and external partners. An amount will also be allocated for reactive support where residents who are in hardship can apply for help and support.
- 3.6.4 In addition, a new model of support for Brent residents has been developed through the piloting of Cost-of-Living Outcome Based Review (OBR) projects and guided by a series of design principles. The approach proposes a single, joined-up model including development of a Community Wellbeing Programme aligned with a refreshed Resident Support Fund (RSF), designed to support residents to be more resilient in the longer term and align more closely with strategic priorities and related projects. The RSF supports the Council's approach towards addressing key community needs through strategic funding and partnerships, ensuring impactful and sustainable support for residents. £1m of recurring funding has been allocated in the Medium Term Financial Strategy to support this new model. The Council's original RSF, a discretionary support fund, has been in place since August 2020 to provide more support to residents and businesses with the cost of living.
- 3.6.5 The 2024/25 budget has been set considering assumptions around future demographic changes, the impacts of the cost-of-living crisis and inflationary trends. It is based on these assumptions and current trends that the Partnerships, Housing and Resident Services department is forecasting a break-even position for areas other than Housing Needs for 2024/25. However, there are risks and uncertainties that could impact the year's final financial outturn position.

Risks and uncertainties

- 3.6.6 Housing Needs and Support continues to be the most significant area of risk for the department. An extremely elevated level of demand for housing services and emergency accommodation is a national issue that is particularly acute in London. The Housing Needs Service in Brent has seen

a 12% increase in the number of homelessness presentations received in 2023/24 (7,300) compared to 2022/23. The total number of households in temporary accommodation in Brent has increased by 8% over the same period, and the number of families in emergency temporary accommodation has increased by 36%. As at the end of August 2024, the total number of homeless households living in emergency type accommodation had risen to 1062, with the service placing an average of 30 households every week. This is a 15% rise in comparison to April 2024 that had 922 households in stage 1 temporary accommodation.

- 3.6.7 London Councils conduct analysis and benchmarking of peers that help to gauge the situation in London. They revealed that Housing pressures are increasing rapidly compared to budgeted levels and that Councils' net deficit on homelessness service spending was projected to be £104.9m (54.2%) higher in 2023/24 than it was in 2022/23. Brent has seen a 259% increase in the deficit between 2022/23 and 2023/24. The gross total monthly TA spend was £65.2m in January 2024 up 28.1% on a year earlier. Across London, the total number of households in temporary accommodation has increased by 8.4% and the total number of families living in B&B accommodation rose by 70% when compared to the previous year. There was a 131% increase in families living in B&Bs beyond the six-week limit.
- 3.6.8 As these issues are London wide, the availability of B&B and Annexe accommodation is severely restricted across the capital, with many Councils being forced to book rooms in commercial hotels to meet statutory duties. This lack of availability of accommodation is resulting in having to use expensive providers and at times outside of Brent, which also causes significant financial pressures to the families placed there due to additional travel costs for children at schools in Brent.
- 3.6.9 The supply of settled TA properties, leased from private owners and used to move families out of B&B and Annexe accommodation has also contracted. This is due to fewer new properties being procured under Private Sector Leasing (PSL) schemes, and owners not renewing the lease for existing stock when the lease ends.
- 3.6.10 London Councils' findings suggest that London's PRS (Private Rented Sector) is affected by multiple factors driving a reduction in the availability of properties for rent. The demand for housing is continuing to increase while supply is reducing across the whole market. Greater reliance on the PRS to house lower income households and increasingly limited housing benefits are making accommodation less affordable and available. It appears to be supply side factors notably taxation, interest rate changes and uncertainties about future regulation that are reducing availability at the lower end of the PRS.

- 3.6.11 Homeless households placed in temporary accommodation who are entitled to it can claim housing benefit to go towards their housing costs. Local authorities pay the cost of that housing benefit upfront and then are paid back by the Department for Work and Pensions (DWP) through subsidy arrangements. Households receive the full housing benefit they are entitled to, however the amount the council can claim back is limited to 90% of the Local Housing Allowance (LHA) rates from 2011. This means that if the cost of the housing benefit claim is higher than those rates, the local authority loses money. The council is essentially bridging the gap between rent and the amount the council is allowed to recover in housing benefit subsidy from the Department of Works and Pensions. This means that if the weekly award of housing benefit for a placement in a bed and breakfast is higher than £170 on average per week, the council only receives £170, and the difference comes at a cost to the council. The average placement is in excess of £280 per week.
- 3.6.12 In 2023/24, the total subsidy loss for the Council amounted to £10.4m. In 2024/25, the Council is changing its approach to rental charges, which is expected to reduce the amount of lost subsidy, but these costs will be borne by the Housing Needs service.
- 3.6.13 A programme of works has been designed to focus on containing the projected overspend. Several workstreams covering affordability of Temporary Accommodation and new and alternative supply have been set up. Officers are actively looking to renegotiate prices and identify alternative arrangements that would allow the Council to move some of the most expensive cases with the aim of reducing costs for the Housing Needs service. Officers also continue to carefully consider and assess the needs of homelessness applications. In 2023/24, 49% of approaches were successfully prevented or relieved. At the end of August 2024, the average percentage of approaches that had successfully been prevented or relieved in 24/25 reached 53%.
- 3.6.14 In 2024/25, i4B is continuing its street property acquisition programme and had a target to acquire 25 homes. i4B is a housing company wholly owned by Brent Council set up to acquire, letting, and manage a portfolio of affordable, good quality private rented sector (PRS) properties. Properties are let to homeless families at Local Housing Allowance (LHA) levels. This enables the Council to either prevent or discharge its homelessness duty and therefore reduce temporary accommodation costs whilst also ensuring families have a secure and responsible landlord. The rise in LHA rates has enabled i4B to increase its acquisition price caps. As at end of August 2024, 26 properties have been acquired and these property sizes range between one to five bed properties, meaning i4B has exceeded its target for the year and is on track to acquire a total of 40 properties in the year. Negotiations are in progress for additional properties in the borough. i4B continues to be

self-financing and the current portfolio results in an annual saving in excess of £4m in Temporary Accommodation costs. Whilst building and new acquisitions would not solely resolve the homelessness crisis, the Council is doing everything within its powers and the funding available to source new supply. Any new supply would help to avoid additional housing costs and mitigate the risk of the projected overspend increasing.

Supported Exempt Accommodation

- 3.6.15 In addition, the supported exempt accommodation properties are leading to growing financial pressures on the Council and present a new budgetary risk for 2024/25. This is because providers are not constrained by the LHA caps like other landlords and are able to charge a higher rent once they justify that they are providing support. The amount of Housing Benefits subsidy is dependent on the Rent Officer decision and is awarded based on the claim related rent. This is a national challenge as there is a need for better regulation around the agreed criteria that a provider should meet to be considered as a Supported Exempt Accommodation provider and further clarity on what constitutes as minimal care would enable a universal approach when considering an individual's support needs. In Brent, the resulting subsidy loss to the Council is forecast to be in the region of £5m - £9m for the year. Historically, this has not been a significant budget pressure for the Council and has been managed corporately within Central Budgets. At this stage an overspend of £5m is forecast while further work investigative work takes place.
- 3.6.16 A dedicated working group has been set up within the Council and its work aims to minimise the opportunities for exploitative landlords to join the Supported Exempt Accommodation market by introducing a clear strategy on the Council's mechanisms to review landlords that enter this market and those already established. Reviews will also be carried out to consider the individual's support care needs and to verify whether the provider is providing the appropriate amount of care.

Savings and Slippages

- 3.6.17 A total of £1.5m in savings is planned to be delivered from the department's budgets in 2024/25, including a £0.4m housing saving deferred from the previous financial year. The main savings are expected from service transformations, restructures and digital projects. Considering the overall pressures on the Housing service, there is a risk that the £0.4m saving will not be achieved in the current financial year due to slippages against the delivery of this saving, however it is anticipated that any slippages will be managed by the department through one-off in year measures.

Summary of Key Assumptions

Key Assumption	Downside if worse	Upside if better	Mitigations
The additional number of homeless people can be managed within the existing forecast.	Each person costs on average £360 per week to accommodate, therefore any further increases in demand would result in a circa £0.1m per quarter for every 20 people.	Faster progress on homeless pathways or any decrease in demand will reduce expenditure by £350 per week per person.	The service is focusing on moving homeless clients along the various pathways. Various project workstreams are focusing on sourcing additional housing supply to alleviate some of the pressures.
Rent collection rates for the Housing Needs service will not fall below the anticipated level.	A 5% worsening in the collection rate will cost £0.4m.	A 5% improvement in the collection rate will recover £0.4m.	Collection rates are being closely monitored and investigations into the drivers for the movements in the collection rates are ongoing.
Other inflation linked costs can be contained within existing budgets.	A 3% increase in costs above budgetary assumptions could cost an additional £0.2m per annum	A 3% cost reduction in costs would result in a circa £0.2m saving for the year.	The department continues looking for best way to achieve value for money, utilising the most efficient procurement and service delivery options and negotiations.

3.7 Central items

Collection Fund – Council Tax

- 3.7.1 The net collectible amount for Council Tax for 2024/25 (after exemptions, discounts and Council Tax Support) as at 31 August 2024 is £217.1m (£216.9m at 31 May). As at the end of August 2024, the amount collected was 43.3%, a decrease of 1.7% when compared to the in year target and equal to the amount collected in the same period in 2023/24.

- 3.7.2 At the meeting of General Purposes Committee in December 2023, the decision was taken to increase the long-term collection rate for budget setting back to the pre-pandemic target of 97.5%. The target had previously been reduced to 97.0% in December 2021 to account for anticipated increase in uncollectable debts arising from the acute economic impact of the Covid-19 pandemic and the resulting recession. The decision to reverse this reduction was taken on the basis that with all Covid-19 restrictions having been lifted, it could be expected that collection would return to the pre-pandemic average. Increasing the long-term collection rate resulted in an increase to the tax base used for budget setting purposes, which in turn resulted in an increased Council Tax income used to fund the 2024/25 budget.
- 3.7.3 In 2023/24, by 31 March 2024 only 92.2% of the net collectable debit for 2023/24 had been collected, 1.8% below the 94% in year target and 2.1% lower than the equivalent figure for 2022/23. Based on the collection in the year to date, a similar level of collection can be expected at the end of 2024/25, indicating that the issues that have been negatively affecting the collection of Council Tax are continuing. The most prominent of these impacts is likely to be the ongoing cost-of-living crisis, which has been exacerbated in Brent by levels of unemployment above national and London averages.
- 3.7.4 Furthermore, analysis of the trends in the Council Tax collection over several years has shown that the collection has been falling since before the Covid-19 pandemic, meaning that the short-term shocks have only accelerated the longer-term trend.
- 3.7.5 The Revenue and Debt service are currently utilising external resources to enable a deeper analysis of the outstanding Council Tax debts and the reasons for non-payment. The analysis will also enable the service to segment the debts based on the likelihood of collection, ensuring that appropriate actions can be taken which maximise the collection within the internal resources that the Council has available.
- 3.7.6 The results of this work and the effect that it has on the long-term forecast of Council Tax collection will determine whether it is possible to continue with the current long term collection target for setting the 2025/26 budget. Current Medium Term Financial Strategy assumption is for a 97.5% long term Council Tax collection for all years. The current low in year collection does not necessarily mean that the target needs to be reduced and every effort will be made by the Council to achieve this target if possible. However, if it is necessary to reduce the target, this will reduce the funding available to the General Fund for 2025/26 by approximately £0.9m for every 0.5% reduction.

- 3.7.7 In the current uncertain funding environment for local government there is potential significant risk to the Council's financial resilience. Any budget gap arising from reduced expectations for collection will have to be met either from reserves in the short term or from additional budget savings. The Council has already committed to a challenging programme of savings across 2024/25 and 2025/26 and the reserves have been depleted in recent years due to high inflation and demographic pressures.
- 3.7.8 Recent years have seen some of the pressure from the reduction in Council Tax collection be mitigated by higher than average tax base growth, which has been driven by the regeneration work ongoing within the borough. Based on the homes we have delivered to date and those expected to complete within our pipeline, the Council will exceed our target to deliver 1000 homes by the end of 2024. Brent also received the highest level of New Homes Bonus in 2023/24 at £7.9m as a result of increasing the supply of homes more than any other Council in the UK. With interest rates at their highest level for over a decade and expected to remain high, it is not yet clear what effect (if any) this will have on the building of new homes in Brent. Work will continue in the coming months to produce a more accurate forecast for the growth in the Council Tax base, and this will feed into the budget setting for 2025/26.

Collection Fund – Business Rates

- 3.7.9 The budgeted net collectable amount for Business Rates (NNDR) for 2023/24 is £140.1m (after exemptions, reliefs and discounts). This was based on the forecast used for the NNDR1 form in January 2024 and has increased by 11.6% from £125.5m in 2023/24. This increase is largely the result of a £10.5m reduction in the transitional relief provided to businesses (£1.7m, down from £12.2m in 2023/24), which deferred the increase to their business rates resulting from the revaluation of all non-domestic properties as at 1 April 2023.
- 3.7.10 The actual net collectible amount for NNDR as at 31 August 2024 is £135.5m, a reduction of £4.6m from the budget in January 2024. This is mostly due to additional empty properties for which relief is given to the businesses. Further adjustments to this may occur during the year due to increases or reductions in the number of non-domestic properties and successful appeals against rateable values.
- 3.7.11 Any movement in the net collectible amount for NNDR does not directly affect the General Fund as the overall resources that the Council receives from the Business Rates retention system are determined in the Local Government Finance Settlement. However, where the actual income to the Collection Fund is different to the budget, Brent's share of the resulting surplus or deficit estimated in January is distributed to or from the General Fund in the following

financial year. The reduction in business rates income resulting from the additional empty property relief is an unfunded relief, meaning that this will result in a deficit that will affect the 2025/26 budget.

3.7.12 As at 31 August 2024, the amount collected was 43.7%, which is 3.06% below the amount collected in the same period in 2023/24 (46.78%). This is partly due to delays with the payment of a small number of large liabilities, which should be resolved in the coming months.

3.7.13 Furthermore, there remains a number of factors present in the economy, which could have a negative impact on the ability of businesses to pay their Business Rates, such as high interest rates and the reduction in consumer spending power as a result of the ongoing cost-of-living crisis. Work is underway to review the NNDR collection rates and determine if the future trend is one of continued growth, or if the aforementioned economic factors will result in a new drop in collection rates.

Savings

3.7.14 The 2024/25 budget, agreed at Full Council on 29 February 2024, included an £8.0m savings target, of which £4.5m had been agreed in February 2023. Appendix A sets out the progress in delivery against this savings target and any mitigating actions. Of the savings for 2024/25, at quarter 2, 96% of these are on track to be delivered, which equates to delivering £7.7m of the £8.0m budgeted savings required.

Virements

3.7.15 The table below shows the virements which have been entered to adjust the budgets at Corporate Directorate level during 2023/24.

	2024/25 Opening Budget	In-year growth	Transfer of functions between services	Technical Adjustments	2024/25 In- Year Budget at 31.07.2024
	£m	£m	£m	£m	£m
Community, Health and Wellbeing	147.2	10.1	0.0	(1.0)	156.4
Children and Young People	85.8	4.6	0.0	0.7	91.0
Neighbourhoods and Regeneration	26.0	0.0	2.4	1.1	29.4
Partnerships, Housing and Resident Services	43.1	0.1	(2.4)	(2.0)	38.8
Law and Governance	12.6	0.1	0.0	1.1	13.8

Finance and Resources	17.6	0.0	0.0	(0.2)	17.3
Central Items	(332.2)	(14.9)	0.0	0.3	(346.8)
Total Budget	0.0	0.0	0.0	0.0	0.0

3.7.16 In year growth items are budget movements from the Central Items budget to Departmental budgets which were not actioned at the start of the financial year. The table above includes the following in year growth items added between April and July 2024:

- Allocation of confirmed growth requirement for Concessionary Fares (£3.1m)
- Temporary funding for recurring budget pressures in Community, Health & Wellbeing (£6.9m) prior to 2025/26 growth.
- Allocation of confirmed growth requirement for Children & Young People (£2.8m)
- Temporary funding for deferred savings to 2025/26 following review of the service (£1.8m)
- Temporary funding for additional IT equipment (£0.1m)
- Permanent funding for increase to salary budget in Law & Governance (£0.1m)

3.7.17 Transfers of functions between services are budget movements between Corporate Directorates, which occur when a department is moved from one service to the other. The virement ensures that the department and the related budget remain together. The table above includes the following transfer of functions between services items added between April and July 2024:

- Transfer of services from Partnerships, Housing & Resident Services to Neighborhoods & Regeneration following Council restructure in April 2024 (£2.4m)

3.7.18 Technical adjustments are budget movements resulting from either events which are provided for in the MTFs, but only confirmed during the year (e.g. pay award), or budget movements resulting from changes to processes (e.g. centralisation of budgets). The table above includes the following technical adjustment items added between April and July 2024:

- Allocation of funding for Climate Change and Cost-of-Living support from the Borough Plan budget (£0.5m)
- Reduction of Public Health expenditure budget to match grant income (-£0.3m)
- Reduction to Public Health salaries budget following change to recharge process (-£0.4m)
- Movements between departments as a result of the Council restructure in April 2024
- Transfer of positions between departments

4.0 Dedicated Schools Grant (DSG)

Funding Blocks	Overall DSG Funding 2024/25	Forecast Expenditure	Overspend/ (Underspend)
	£m	£m	£m
Schools Block	121.6	121.6	0.0
High Needs Block	77.0	77.3	0.3
Early Years Block	35.2	35.3	0.1
Central Block	2.1	2.1	0.0
Total DSG	235.9	236.3	0.4

Summary

- 4.1 The DSG forecast is reflecting a deficit of £0.4m, against grant funds of £235.9m for 2024/25, due to £0.3m pressures from High Needs (HN) Block and £0.1m from Early Years (EY) Block. As reported in Quarter 1, the forecast assumes that the other funding blocks will achieve a balanced budget by the end of the financial year. This position is likely to change over the next two quarters, as more information becomes available.
- 4.2 The EY Block is projecting an overspend of £0.1m. This is mainly resulting from the DfE's in year adjustment to the EY Block funding in July 2024, following the completion of the January 2024 census which confirmed the actual childcare hours Brent was set to receive for the current financial year. It is worth noting that this position is likely to change over the next few months as payments to childcare providers for the autumn term would determine if there has been an increase in the number of take up hours for EY provision from September 2024. In addition to this, due to changes in EY funding from September 2024 - working parents of 9 months – 3 years old can receive up to 15 hours a week free education and childcare, which will also have an impact on the projected overspend.
- 4.3 Although the HN Block allocation increased by £2.3m in 2024/25, the number of children with Education, Health, and Care plans (EHCPs) has continued to rise, therefore adding continued pressure against the HN Block from growing demand. The HN budget, including the proportion allocated to academies, is £77.0m. This allocation includes a £1.4m transfer from the Schools Block. The HN Block funding is expected to be adjusted for a recoupment of funds for school place funding for Brent pupils in other local authority areas and for a place funding repayment from other local authorities, following a recent import/export review by the DfE in July 2024.
- 4.4 The cumulative DSG deficit brought forward from 2023/24 is £13.2m, this included an in -year surplus of £0.6m achieved in 2023/24. The deficit carried forward since 2022/23 has been disclosed as an earmarked unusable reserve

in line with DfE regulations (the School and Early Years Finance (England) Regulations 2023). The regulations state that the deficit must be carried forward and held separately from in year surpluses, to be funded from future years' funding and/or recovery plans agreed with the DfE. The overall forecast will increase the DSG deficit to £13.6m by the end of this financial year.

Forecast

- 4.5 The £0.3m deficit against the HN Block is an increase from the break-even position reported in Quarter 1. This is mainly due to an increase in the forecast spend on top-up funding to out-borough mainstream schools and academies and independent Special schools.
- 4.6 The growth in EHCPs is a London and national trend whereby the number of children assessed as meeting the threshold for support continues to increase. However, the HN funding has not increased in line with the growth in overall pupil numbers creating financial pressures. At the end of July 2024, there were 3763 EHCPs, which represents a growth of 12% compared to July 2023 with 3363 EHCPs.

The forecast position is due to the following pressures:

- £1.2m forecast pressures against top-up funding paid to out-borough academies and mainstream stream schools and Independent Special schools due to increased number of pupils with special educational needs placed within the borough.
 - The pressure is further offset by a £0.8m forecast underspend against SEN Services and support being provided for inclusion services. This forecast is likely to change by year end as activity is subject to the actual number of pupils excluded from mainstream schools during the year, following enrolments from September 2024.
- 4.7 The Council has a High Needs Block Deficit Recovery Management Plan in place with longer-term actions to recover the deficit. A task group led by the Corporate Director of CYP and the Corporate Director of Finance coordinates and monitors these actions. Some of these actions to reduce costs include; managing demand for EHCPs through adopting a graduated approach framework, improving sufficiency of places through increasing the amount of special provision within the borough, particularly for secondary phase pupils and 16–25-year-old SEND students and financial management to identify efficiencies and charging an administrative cost to ensure that there is full cost recovery from other local authorities that place pupils in Brent Special Schools. A combination of these longer-term recovery actions and anticipated funding increases is expected to achieve continued reduction in the deficit.

- 4.8 In 2022/23 Brent participated in the DfE programme called Delivering Better Value (DBV) in SEND, to provide dedicated support and funding to help local authorities reform their high needs systems. The first phase of the programme included a comprehensive diagnostic to identify root cause cost drivers and mitigating solutions or reforms and support in developing a quality assured Management Plan and the opportunity to bid for a £1m grant to deliver the actions in the Management Plan. Brent was successful and has received £1m funding over two financial years 2023/24 and 2024/25. The programme is in its test and learn phase with specific project workstreams being implemented and monitored along with key performance indicators designed to ensure that actions are tracked. The DBV programme will not address the historic deficit but changes that will be embedded as a result of the programme will be aimed at reducing future spend. The current Management Plan and efficiencies identified from the programme may allow funds to be released to address historic deficits.

Risk and Uncertainties

- 4.9 A balanced budget has been set for the HN Block but there remains a risk that the number of children and young people with Education Health and Care Plans (EHCPs) will continue to grow above forecast levels. The growth in EHCPs is a national and London wide trend whereby the number of children assessed as meeting the threshold for support continues to increase. However, the HN Block funding has not increased in line with continued growth. Over the years, this has created financial pressures with many authorities holding deficit balances. The HN Block received a 3.5% increase in funding for 2024/25, however the risk remains that this increase may not be sufficient to cover the costs of further increases in EHCP numbers and increases from providers for high inflationary costs.
- 4.10 The financial year 2022/23 was the final year of the statutory override set out in the School and Early Years Finance Regulations 2021 which required local authorities to either carry forward any cumulative DSG deficit to set against the DSG in the next funding period or carry forward some or all the deficit to the funding period after that. The government has now extended the arrangement for another three financial years from 2023/24 to 2025/26. There remains the risk that the local authority would then be required to absorb any accumulated deficit from the DSG by using General Fund reserves.

5.0 Housing Revenue Account (HRA)

HRA gross income and expenditure			
	Budget	Forecast	Overspend/ (Underspend)
	£m	£m	£m
HRA			
Income	(65.9)	(65.9)	0.0
Expenditure	65.9	65.9	0.0
Total	0.0	0.0	0.0

Summary

- 5.1 Budgets for the Housing Management function are contained within the ring-fenced Housing Revenue Account (HRA), which has a balanced budget for 2024/25 made up of £65.9m of income matched by expenditure.
- 5.2 The HRA is forecasting a break-even position, unchanged from the Quarter 1 forecast. However, based on the analysis of last years' activity and spend on repairs, there is a potential pressure on these budgets in 2024/25 that could be circa £2m due to continued levels of demand to address disrepairs, complex repairs and damp and mould related works. If these responsive repairs related pressures materialise, overspends will be mitigated through in year savings and efficiencies.

Risks and uncertainties

- 5.3 High levels of uncertainty around the inflation and interest rates pose a financial risk to the HRA. This impacts the cost of materials and repairs and the cost of new build contracts. In addition, an increase in service requests relating to damp and mould and repairs in general is likely to put additional pressure on budgets.
- 5.4 Other pressures involve the capital programme as there is currently insufficient government funding having been made available to meet environmental priorities and requirements such as carbon reduction works to homes.
- 5.5 Government rent policy currently allows for CPI+1 inflation on rents up to March 2026 and could be subject to policy changes depending on the next government. Rent setting uncertainties add to the difficulties in financial planning and budgeting for improvements and building new homes.
- 5.6 These risks are being continuously monitored and reflected in the HRA Business Plan and the Council's Medium Term Financial Strategy (MTFS).

6.0 Capital Programme

6.1 The capital programme as at Q2, forecasts expenditure to be £36.9m less than the revised budget for the financial year. This is split between £39.3m of budgets that are forecast to slip into next financial year and £2.2m of budget overspends in the current 2024/25 financial year. The budgets have been updated compared to Q1 in two key areas: first a £2.9m increase in the Corporate Landlord budget approved at the 9th of September 2024 Cabinet meeting to meet critical additional capital improvement costs on corporate properties with the bulk of it relating to the Civic Centre. Secondly is the utilisation of contingency Regeneration budgets for the Wembley Housing Zone to meet upward revisions to cost estimates of the Ujima House development. Further explanations for the variances are provided below.

Directorate	Original Budget	Revised Budget	Current Forecast	FY Variance		
				£m	£m	£m
	£m	£m	£m	(Underspend)/ Overspend/	(Slippage)/ Brought Forward	Variance Total
Corporate Landlord	14.2	17.2	16.3	(0.1)	(0.8)	(0.9)
Housing GF	59.8	62.7	61.4	0.6	(1.9)	(1.3)
Housing HRA	57.3	53.7	52.2	1.9	(3.4)	(1.5)
PRS I4B	46.3	46.2	20.5	0.0	(25.7)	(25.7)
Public Realm	23.8	25.4	24.5	0.5	(1.4)	(0.9)
Regeneration	64.7	65.8	64.3	(0.6)	(1.0)	(1.4)
Schools	24.7	25.5	20.1	(0.4)	(5.0)	(5.4)
South Kilburn	27.2	33.4	33.7	0.3	0.0	0.3
St Raphael's	0.3	0.5	0.5	0.0	0.0	0.0
Total	318.3	330.4	293.5	2.2	(39.3)	(36.9)

Corporate Landlord (Capital)

6.2 Corporate Landlord, which is made up of the Civic Centre, Digital Strategy, ICT and Libraries, is forecast to underspend by £1m. This is predominately due to slippage of £0.7m in anticipated agency costs for Digital Strategy. This has been revised downwards based on the expenditure trend to date. There is also a £0.2m projected underspend relating to budgets created to enable more flexible working and funds sets aside to support energy efficiency improvements on corporate buildings.

Risks and Uncertainties – Corporate Landlord

- 6.3 Ongoing works to the Civic Centre such as complex roofing works and improvements to the lifts could experience higher spending than budgeted for and will be monitored throughout the year. At the 9th of September Cabinet meeting an additional budget of £8.7m was approved to cover critical major repairs predominately at the Civic Centre for the next 3 years which will help mitigate some of these risks, but additional costs are expected to emerge as more condition surveys are completed on other non-housing Council properties and assets.

Housing General Fund (Capital)

- 6.4 The Housing General Fund as at Q2 is forecasting to spend £1.3m less than the revised budget for 2024/25 of £62.7m. The variance consists of net slippage of £1.9m and an actual forecast overspend of £0.6m. The slippage is made up of £3m forecast slippage on the Church End development project as the project start on site was later than initially assumed during budget setting. This is offset by accelerated spend on the Edgware Road project with an expected advance spend of £1.2m of future budgets in current financial year. £0.6m of actual overspends on budgets are reported in Q2 in two areas; £0.3m on the Preston Park mixed development relating to higher than budgeted library fit-out costs and Northwick Park spine road project which is being delivered in partnership with the hospital, university, and Sovereign Homes. The estimated project overspend of £0.4m on the Northwick Park project is primarily driven by adverse movements in the cost to deliver utility infrastructure and unforeseen ground conditions. It is anticipated that the additional costs on the Northwick Park will be recovered by the Council's partners, but the timing of the recovery is uncertain hence the overspend forecast. The Preston Park project is funded by SCIL and the Northwick Park by borrowing while the Council takes steps to recover the additional costs from its partners.

Housing HRA (Capital)

- 6.5 Housing HRA is forecast to underspend by £1.5m compared to the revised budget, this splits between £3.4m of budgets expected to slip into next financial year and £1.9m of overspends on projects. Five Tower Blocks project is the main contributor to the slippage with £1m of the slippage attributed to it and a result of delays to the project from longer planning application processes than anticipated. Remaining slippages relate to various pipeline schemes that are not progressing as expected due to viability issues. These are offset by overspends of £0.7m relating to energy efficiency works within the Major Repairs Programme and other minor overspends spread across several major repair projects. The overspends in the current year are being offset by underspends from the slipping capital projects, however over the medium term it will be managed within the

affordability limits determined from the HRA business planning process.

Risk and Uncertainties – Housing

- 6.6 While cost inflation has slowed down in recent months, the recent rises are baked into current costs while additional cost pressures have also emerged from recent updates to fire safety regulations and the resulting need for redesigns. These and the high-interest rate environment continue to pose viability challenges. The construction industry is also seeing an increase in the number of contractors and suppliers going into administration, which is affecting competition in the sector and therefore contract costs. To help mitigate the impact of these costs on Council capital budgets, officers have commenced an exercise to review and improve the procurement of development schemes across the Council for the New Council's Homes Programme. The main aim is to strengthen the commercial position of the Council when procuring development schemes to improve the financial returns of the Council from these schemes.
- 6.7 The Council continues to face substantial supply pressures for Temporary Accommodation and has several schemes in the pipeline to help increase supply. Delivery of these pipeline schemes is increasingly becoming challenging due to viability issues brought about by recent high cost of construction and related supply chain issues. To mitigate this, the on-going acquisition programme to increase the supply of temporary accommodation through the Council's subsidiary I4B is expected to continue in 2024/25. The Council has also secured funding under the government's Local Authority Housing Fund (LAHF) programme to increase supply in the borough to help tackle the supply pressures for temporary accommodation. Additionally, the Council is also exploring introducing other tenure types into its development programme to create cross subsidy for social housing units while also increasing supply of homes in the borough.

PRS I4B and First Wave Housing

- 6.8 At Q2, I4B Private Sector Acquisitions is reporting to slip £25.7m of its allocated budget spend into next financial year. The current year's budget is composed of a loan facility for I4B to be drawn subject to them presenting a viable property acquisition programme.

Risk and Uncertainties - PRS I4B and First Wave Housing

- 6.9 I4B and First Wave Housing are collaborating with the Council to shape their future acquisition strategy and assess the availability of loan funding.

Risk and Uncertainties - St Raphael's

- 6.10 As at Q2, St Raphael's is forecast to spend £0.5m in line with £0.5m 24/25 budget, this will consist of £400k improvement to pavements and roads in the estate as well as £150k for additional CCTV equipment agreed with the residents. The next phase will be to instruct the community centre works along with the landscaping enhancement on the estate, once planning award has been secured currently scheduled for October 2024. A notable risk is the future profile of major works scheduled to commence from 2025/26 and beyond, which requires a more realistic assessment. This profile will be established once there is greater clarity around the programming and timing of the works.

Public Realm

- 6.11 As at Q2, Public Realm projects are forecast to underspend by £0.9m compared to the budget of £25.4m. There are approximately 135 live Public Realm capital projects. The majority of the £1.4m slippage reported in Q2 relate to delays for the following schemes; £0.8m on several Healthy Neighbourhoods schemes aiming to reduce traffic to improve air quality (e.g. Roe Green, Forty Lane, Watford Road and Hillside) – these have slipped due to reduced Healthy Streets staffing; £0.3m Gladstone Park tennis courts and sports pitches upgrades which have not yet been contracted; £0.3m waste bins, funded by the Council, which was delayed due to new DEFRA legislation. The Council continues to use sacks whilst further government advice is sought. The £1.4m underspends due to slippages are offset by the £0.5m of overspends in the 24/25 budget. These are the road potholes and carriageways resurfacing programmes (£0.4m, funded by Department for Transport) and the Brent School Streets development (£0.1m).

Risk and Uncertainties – Public Realm

- 6.12 The reduction in grant funding for TFL has resulted in a smaller scope of work to deliver the Local Implementation Plan. The long-term programme is being developed in recognition of this reduced level of funding to ensure the impact of the funding received is maximised. In addition, whilst we wait for further advice on the new DEFRA legislation and residents use sacks for household waste rather than bins.

Regeneration

- 6.13 The Regeneration programme budget is forecast to underspend by £1.4m compared to the current year budget of £65.8m. Most of the current year's budget is allocated to the Wembley Housing Zone. The underspend consists of £1m of budget slipped into next financial year on the Picture Palace and Bridge Park projects. For Picture Palace, due to delays in confirming the position of the operation of the building, the contract was awarded later than planned. The contractor is now on site and the project is expected to

complete in summer 2025. For Bridge Park, the Council is working with GMH (the developer) to finalise the masterplan prior to beginning pre-planning consultation later this year. The UK Shared Prosperity Fund (UKSPF) works programme budget has reduced by £0.5m. £0.3m of capital costs have been reclassified to revenue grant funded sources and the remaining £0.2m was already part of the Picture Palace works budget. Underspends on the Morland Gardens project relate to budgets that are no longer required following the decision to pause the scheme and review all delivery options for the site.

Risk and Uncertainties - Regeneration

- 6.14 The capital regeneration and development projects are subject to various risks and uncertainties. These include land and planning risks, and increased cost from new health and safety regulations and recent high build costs all potentially leading to delays and impacting scheme viability. The Wembley Housing Zone contingency budget was applied in Q2 to mitigate cost uncertainties. These will be monitored throughout the year and updated accordingly.

Schools

- 6.15 As at Q2, the Schools Capital Programme board is forecast to underspend by £5.4m. This consists of £5m forecast slippage in Q2, largely due to £4.3m of the budget for the SEND expansion programme slipping into future years due to an unsuccessful procurement process that has resulting in the scheme budget slipping into next financial year. The other £0.4m slippage relates to the Islamia School project which is attributed to delays in agreeing designs. An underspend of £0.4m is forecast in Q2 on staff capitalisation because of these slipped programme activities.

Risk and Uncertainties – Schools

- 6.16 There have been delays to some of the projects within the SEND Capital Programme due to issues such as changes in OFSTED ratings and failed contractor procurement exercises. As a result, the programme could experience volatility in its delivery and costs to deliver due to the delays in starting some of the projects. The capital projects are also impacted on the challenges in the construction industry such as inflation, resource and material availability and contractor administration.

South Kilburn

- 6.17 The South Kilburn Capital Programme is forecasting a minor underspend of £0.2m on the current year budget of £33.4m. This relates to the energy

infrastructure work for the site and updated costs of procurement activities in the current year compared to budget.

- 6.18 The South Kilburn project will deliver over 2,400 homes, of which 50% will be affordable. The forecast for the financial year includes project costs for ongoing projects, acquisition costs for obtaining vacant possession as well as funding for a project to identify the most beneficial way of delivering the remaining phases of the South Kilburn programme. The District Energy Network (DEN) has experienced a delay in delivery, and the option of a temporary energy resource is being investigated.

Risk and Uncertainties – South Kilburn

- 6.19 Viability is a key challenge for the remaining developments within the South Kilburn programme. The Council as a result is exploring other development routes aimed at improving the viability of the future phases and help provide certainty for the programme.

Treasury Management Prudential Indicators

- 6.20 In line with changes to the Prudential Code in 2021, the performance of the Council's treasury and capital activities against the approved prudential indicator for the year are now reported quarterly within these financial reports to members. Details of the performance against the indicators in the first quarter of the financial year are captured in Appendix B and show the Council to be operating within the limits of the prudential indicators.

7.0 Stakeholder and ward member consultation and engagement

- 7.1 There are no stakeholder and ward member consultation arising from this report.

8.0 Financial Considerations

- 8.1 This report sets out the financial forecast for the General Fund revenue budget, the Housing Revenue Account, the Dedicated Schools Grant and the Capital Programme, as at Quarter 2 2024/25. Financial implications of agreeing to this report are included within the forecasts provided.

9.0 Legal Considerations

- 9.1 The law requires that the council must plan to balance its spending plans against resources to avoid a deficit occurring in any year. Members need to be reasonably satisfied that expenditure is being contained within budget and that the savings for the financial year will be achieved, to ensure that income and expenditure balance (Section 28 Local Government Act 2003: the

council's Financial Regulation 2.3 Revenue Budget Monitoring, Forecasting and Overspends).

10.0 Equity, Diversity & Inclusion (EDI) Considerations

10.1 There are no EDI considerations arising out of this report.

11.0 Climate Change and Environmental Considerations

11.1 There are no climate change or environmental considerations arising out of this report.

12.0 Human Resources/Property Considerations (if appropriate)

12.1 There are no HR or property considerations arising out this report.

13.0 Communication Considerations

13.1 There are no direct communication considerations arising out of this report.

Report sign off:

Minesh Patel

Corporate Director of Finance and Resources

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Appendix A - MTFS Savings Delivery Tracker 2024/25

Department	Reference	Project / Proposal	Category	Description	2024/25 (£000)	RAG Status	Comments / Mitigating Actions
Corporate	2023-24 CORP4	Procurement savings	Procurement	To be managed by the Commissioning and Procurement Board. All contracts on pipeline will come to the board to review contract specifications in order to deliver savings	51	Green	On track to be delivered
Corporate	2023-24 AH08	Technical Adjustment - recurring grant funding	Service Transformation	Recognition of grants not previously budgeted for in the MTFS.	1,500	Green	On track to be delivered
Subtotal					1,551		
Community Health & Wellbeing	2023-24 GOV10	Procurement restructure	Restructure	Review structure of the Procurement team with overall impact leading to a reduction in the establishment by 1 FTE	50	Green	On track to be delivered
Community Health & Wellbeing	2024-25 CHW01	Technology Enabled Care	Service Transformation	Enabling residents to self-manage their health and well-being, including preventing and reducing the need for care and support through technology so they can stay independent and well in their homes and communities	100	Amber	Work has commenced in determining an approach to TEC within Adult Social Care services, including a project workshop facilitated by the Corporate Transformation Team. However, savings are still to be achieved from this workstream, and other options such as charging for telecare are being considered, and a soft-market test for our telecare service to recommission in 2025 is being prepared.
Community Health & Wellbeing	2024-25 CHW02	Managing demand at the front door, prevention and early intervention	Service Transformation	Managing demand and complexity of support to 23/24 with a consistent prevention and reablement offer and a focus on Care Act statutory responsibilities including integrated market management	365	Green	On track to be delivered

Community Health & Wellbeing	2024-25 CHW03	Continuing sustainable long-term care and support needs costs that promote independence	Service Transformation	Reducing expenditure in mental health and learning disability including transitions so Brent benchmarks in the middle quartile with comparator authorities	275	Green	On track to be delivered
Community Health & Wellbeing	2024-25 G09 (d)	Discontinue use of underutilised IT on-line systems/services	Service Transformation	A review has identified several underutilised resources across the Governance department and ceasing to subscribe to these will enable savings to be made. Cease use of Proactis e-tendering system and marketplace system	16	Green	On track to be delivered
Subtotal					806		
Finance & Resources	2023-24 FR04	Civic Centre Office Let	Income Generation	Lease further floors of the Civic Centre to external organisations / tenants to generate revenue	680	Green	On track to be delivered
Finance & Resources	2024-25 FR01	Increase Civic Centre Car Park Charging Tariffs in line with inflation/local prices	Income Generation	The current Civic Centre Car Park charging tariffs were introduced in September 2022. There is an opportunity to increase the car park charging tariffs in line with inflation and the rates charged at other car parking facilities within the vicinity of the Civic Centre from April 2024.	100	Green	On track to be delivered
Finance & Resources	2024-25 FR02	Property Strategy to maximise rental return on council assets	Income Generation	A new Property Strategy will allow the council to maximise the opportunity of increasing revenue from its assets. A starting target which we would endeavour to increase over time.	50	Green	On track to be delivered

Finance & Resources	2024-25 FR03	Delete three vacant posts	Digital	The current finance establishment has a number of vacancies. It is proposed to delete three posts that are currently filled by agency workers. Digital transformation will lead to improvements in self-service to enable further transactional activity to be reduced.	250	Green	On track to be delivered
Finance & Resources	2024-25 G09 (b)	Discontinue use of underutilised IT on-line systems/services	Service Transformation	A review has identified several underutilised resources across the Governance department and ceasing to subscribe to these will enable savings to be made. End contract with Alcamus and build system in SharePoint	22	Amber	Savings to be reflected in the budget this month. There is no contract end date in sight because of dependencies arising from the development of a usable in-house alternative. This is a work in progress.
Subtotal					1,102		
Page 133 Children & Young People	2023-24 CYP05	Looked after Children and Permanency	Restructure	Review of agency worker usage and implementation of a vacancy factor	510	Green	On track to be delivered
	2023-24 CYP06	Forward Planning Performance & Partnerships	Procurement	Proposed savings will be made through the commissioning of placements for Looked After Children and Care Leavers	860	Green	On track to be delivered
Children & Young People	2023-24 CYP09	Digital / Transformation Savings	Service Transformation	Admin - case management, RPA, Mosaic enhancement (alerts), electronic document management, removing manual processes and excel. Schools admissions chatbots/virtual agents. Direct payments automation and reduction in overpayments; potential for increased alignment with ASC DP team. CAMS dashboard.	200	Amber	£88K not achievable by original proposal and potential slippage of £60K due to delayed programme implementation. Pressure to be managed within the wider CYP directorate budgets

Children & Young People	2024-25 CYP01	Reduce the value of the contract that provides a targeted service that promotes education, employment, and training for young people. (Inclusion)	Reduction in provision	The current contract ends on 31 March 2024. The planned contract value from April 2024 onwards is £565,000 per annum (reflecting a previous saving of £80K). A 10% saving is proposed when the contract is re-procured. This will be targeted at the non-statutory element of the contract resulting in a reduction in bespoke projects for targeted vulnerable groups, fewer access points for the service and no service for children currently in specialist EAL provisions.	56	Green	On track to be delivered
Children & Young People	2024-25 CYP02	Additional controls to better manage spot purchasing of specialist assessments required for child care proceedings cases (Localities / LACP / Early Help).	Procurement	Additional controls to better manage spot purchasing of specialist assessments, contracts and support packages required for children's care proceedings cases. Practitioners undertaking their own assessments, better due diligence of contracts, reviewing support packages.	50	Green	On track to be delivered
Children & Young People	2024-25 CYP03	Utilising DSG to fund eligible services currently funded from the General Fund. Setting and School Effectiveness / Inclusion / Early Help.	Service Transformation	Utilising the Dedicated Schools Grant to fund eligible services currently provided from the General Fund. A review of Early Years functions that are funded through DSG across Setting and School Effectiveness, Early Help and Inclusion Service is being undertaken to reduce duplication. This will result in some DSG savings (1FTE equivalent) which will be repurposed to fund capacity in the Performance Management and Information Team that is eligible to be funded by DSG.	50	Green	On track to be delivered

Children & Young People	2024-25 CYP04	Reduction in school improvement funds in Setting and School Effectiveness Service. Setting and School Effectiveness	Reduction in provision	Reduction in budget identified for targeted school improvement activity. The general fund contributes to the team following the loss of the School Improvement and Brokering grant.	50	Green	On track to be delivered
Children & Young People	2024-25 CYP05	Freeman Family Centre – contact activity Early Help / LACP	Reduction in provision	A new organisation will be taking over tenancy of the Freeman Centre. The current contract with Barnardo's has ended and there is scope to reduce this by up to £50k as part of new arrangements with the new tenant organisation and reducing allocated growth to the existing contact service for children in care that operates from the Freeman Family Centre.	100	Green	On track to be delivered
Children & Young People	2024-25 CYP06	Offsetting overheads/management costs within Early Help through delivery of the Best Start for Life programme. (Early Help)	Service Transformation	To offset some Early Help staff costs using the Best Start for Life programme funding.	70	Green	On track to be delivered
Subtotal					1,946		
Partnerships, Housing & Residents Services	2024-25 CR02	Review of Directorate staffing structures to identify efficiencies	Restructure	Review of Directorate staffing structures to identify efficiencies	150	Green	On track to be delivered
Partnerships, Housing & Residents Services	2024-25 RS01 (a)	Increased use of automation	Digital	Based on 3 complex and 5 simple processes per year across all RS departments (focusing on transactional services) with efficiencies cashed through reduction in posts and/or increase in income.	117	Green	On track to be delivered

Partnerships, Housing & Residents Services	2024-25 RS02 (a)	Business support efficiencies.	Digital	Reduction in business support posts through alignment of support functions across Resident Services, combined with improved forms and integration with back-office systems.	78	Green	On track to be delivered
Partnerships, Housing & Residents Services	2024-25 RS10 (a)	Customer Access Improvement and Performance	Restructure	Restructure and pooling of administrative functions across Resident Services. Approx 2 FTE Reductions	44	Green	On track to be delivered
Partnerships, Housing & Residents Services	2024-25 RS03	Mobile telephony contract	Procurement	Saving through new contract for mobile telephony	200	Green	On track to be delivered
Partnerships, Housing & Residents Services	2024-25 RS04	Licensing	Digital	Savings through application rationalisation and license management	113	Green	On track to be delivered
Partnerships, Housing & Residents Services	2024-25 RS05	Registration and Nationality - Income generation	Income Generation	Fee Increase 24/25 following an income freeze for 23/24	20	Green	On track to be delivered
Partnerships, Housing & Residents Services	2024-25 RS06	Libraries and Heritage - realignment of managerial responsibilities and posts	Restructure	The restructure will focus on maximising income generation and delivering savings in 2024/25 – 2025/26.	48	Green	On track to be delivered
Partnerships, Housing & Residents Services	2024-25 RS07	Community Hubs - Reduction in provision	Reduction in provision	Deletion of a vacant post within Community Hubs	40	Green	On track to be delivered
Partnerships, Housing & Residents Services	2024-25 RS08	Revenue and Debt	Digital	To not recruit to vacant posts / move to digital – self-service / reduction in usage of Resilience Contract	65	Green	On track to be delivered
Partnerships, Housing & Residents Services	2024-25 RS09	Customer Services and Assessments	Digital	Reduction in Benefit Assessment processing costs due to impact of Universal Credit (UC)	61	Green	On track to be delivered

Partnerships, Housing & Residents Services	2024-25 RS10	Implementation of borough wide (except Wembley Park) selective licensing scheme	Income Generation	This is extra income into the General Fund and therefore has no negative impact on staff and service users. It is also not politically difficult to deliver. However, it is dependent upon approval by the Secretary of State.	100	Green	On track to be delivered
Partnerships, Housing & Residents Services	2024-25 RS17	Grave tending / additional vaults in cemeteries	Income Generation	Offer a paid for grave tending service for families that may not be able to access the Brent cemeteries.	40	Green	On track to be delivered
Partnerships, Housing & Residents Services	2024-25 RS18	Mortuary / Bereavement / Funeral Initiatives	Income Generation	A range of small income generating initiatives across our bereavement services	20	Green	On track to be delivered
Partnerships, Housing & Residents Services	2024-25 CR01	Volunteering Platform	Procurement	Not to procure a new Volunteering Platform	20	Green	On track to be delivered
Subtotal					1,116		
Law & Governance	2023-24 GOV11	Digital / Transformation Savings	Service Transformation	Electronic document management, further implementation of DocuSign, sharing documents with external parties via M365, chatbots for routine HR and Legal queries	75	Green	Not achievable by original proposal. Expected to be delivered from alternative budget
Law & Governance	2024-25 G01	Training budget reductions	Reduction in provision	Local training budgets have not been fully utilised in several teams and for the Member Development Programme. It is proposed to reduce these budgets accordingly. In both cases there has been an increase in in-house provision of training and therefore less dependence on purchasing from external organisations.	15	Green	On track to be delivered

Law & Governance	2024-25 G02	Member allowances	Reduction in provision	A reduction to reflect the reduction in the number of councillors as a result of the boundary review	51	Green	On track to be delivered
Law & Governance	2024-25 G03	Elections Legal provision	Reduction in provision	Currently the elections team have budgets to fund the extra legal support that might be necessary were there to be a challenge related to electoral registration or an election. Most years this has not been used. It is proposed in future to rely on the reserves that have been established for elections and call on those should such a challenge occur.	14	Green	On track to be delivered
Law & Governance	2024-25 G04	Miscellaneous overheads	Reduction in provision	This reduction is to reflect existing underspends on stationery and mail	3	Green	On track to be delivered
Law & Governance	2024-25 G05	Review of support arrangements in Executive and Member Services	Reduction in provision	There is scope to reduce the amount of administrative support provided within the service.	10	Green	On track to be delivered
Law & Governance	2024-25 G06	Legal Services – change approach to training posts	Reduction in provision	Currently Legal Services has three traditional graduate level trainee solicitor posts. It is proposed to reduce this to one post. As trainees are a valuable source of recruits to qualified posts, it is proposed to over time to convert two existing Legal Assistant posts to solicitor apprentice posts. These require a lower level of qualification, and the Apprentice Levy can be used to fund the qualification element of the training.	42	Green	On track to be delivered

Law & Governance	2024-25 G07	Increase income target for services to schools and for legal charges to third parties	Income Generation	Income from these sources has increased, for example through more schools buying into the services available from the Governance Department and work undertaken in relation to developments.	42	Green	On track to be delivered
Law & Governance	2024-25 G09 (a)	Discontinue use of underutilised IT on-line systems/services	Service Transformation	A review has identified several underutilised resources across the Governance department and ceasing to subscribe to these will enable savings to be made. The courts are moving to a new bundling system, and this will no longer be required	10	Green	On track to be delivered
Law & Governance	2024-25 G09 (c)	Discontinue use of underutilised IT on-line systems/services	Service Transformation	A review has identified several underutilised resources across the Governance department and ceasing to subscribe to these will enable savings to be made. Cease subscription to expert HR	5	Green	On track to be delivered
Law & Governance	2024-25 G08	Realign graduate budget	Reduction in provision	The number of graduates recruited under the council's programme is variable and as appointments are made part way through the financial year the precise costs are unpredictable. A smoothing reserve has therefore been established to manage this issue and it proposed that the core budget be reduced accordingly. The proposed reduction for 2024/25 is part of an overall £15k reduction already partly implemented.	5	Green	On track to be delivered
Subtotal					272		

Neighbourhoods & Regeneration	2023-24 CR01	Planning Service Staff	Restructure	Reduce planning staff by 5% (3.5 FTE) achieved by natural turnover/deletion of vacant posts. Would impact ability to provide planning service and policy framework.	205	Green	On track to be delivered
Neighbourhoods & Regeneration	2023-24 CR04	Regeneration Capitalisation	Restructure	Opportunity for further capitalisation for 4 years, whilst Wembley housing zone schemes are built	75	Green	On track to be delivered
Neighbourhoods & Regeneration	2023-24 RS18	RLS Related - Negotiate RLS cost reduction	Procurement	Potential to reduce cost as part of RLS competitive dialogue tendering approach	200	Green	On track to be delivered
Neighbourhoods & Regeneration	2024-25 RS01 (b)	Increased use of automation	Digital	Based on 3 complex and 5 simple processes per year across all RS departments (focusing on transactional services) with efficiencies cashed through reduction in posts and/or increase in income.	33	Green	On track to be delivered
Neighbourhoods & Regeneration	2024-25 RS02 (b)	Business support efficiencies.	Digital	Reduction in business support posts through alignment of support functions across Resident Services, combined with improved forms and integration with back-office systems.	22	Green	On track to be delivered
Neighbourhoods & Regeneration	2024-25 RS10 (b)	Customer Access Improvement and Performance	Restructure	Restructure and pooling of administrative functions across Resident Services. Approx 2 FTE Reductions	13	Green	On track to be delivered
Neighbourhoods & Regeneration	2024-25 RS11	Increased subscription to the bulky waste service	Income Generation	A saving to account for an established increase in demand for the bulky waste collection service from around 350 requests when Veolia were operating the service to around 650 requests per month currently	10	Green	On track to be delivered
Neighbourhoods & Regeneration	2024-25 RS12	Increased subscription and £5 charge increase with respect to the garden waste service	Income Generation	To increase the annual subscription price for garden waste collections from £60 to £65, an 8% increase to generate an additional income of £100,000	100	Green	On track to be delivered

Neighbourhoods & Regeneration	2024-25 RS13	Review of the Parks service	Income Generation	Create a programme of organised cultural and entertainment events in parks to include a revision of fees and charges.	70	Green	On track to be delivered
Neighbourhoods & Regeneration	2024-25 RS14	Rental of Parks building space	Income Generation	To review existing unused property space within parks.	30	Green	On track to be delivered
Neighbourhoods & Regeneration	2024-25 RS15	Licensing / sponsorship schemes in Parks	Income Generation	Offer space for advertising in parks.	40	Green	On track to be delivered
Neighbourhoods & Regeneration	2024-25 RS16	Increase tennis/sports bookings	Income Generation	Create and advertise a revised sports booking programme that encourages better take up and which offers new activities.	20	Green	On track to be delivered
Neighbourhoods & Regeneration	2024-25 RS19	Cashless Parking opt In Reminders	Digital	The Council generating income through optional text reminders, which is expected to generate income in the region of £80k per annum.	100	Green	On track to be delivered
Neighbourhoods & Regeneration	2024-25 RS20	RLS Contract Efficiencies Post Year 1	Service Transformation	Review of savings and efficiencies potential once the new contract operations have settled after year 1.	100	Green	On track to be delivered
Neighbourhoods & Regeneration	2024-25 RS21	Removal of vacant posts	Restructure	An ongoing assessment of the need to recruit to vacant posts and whether these can be removed and the tasks accounted for in different ways.	200	Green	On track to be delivered
Subtotal					1,218		
Overall total					8,010		

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Appendix B – Quarter 2 2024/25 Prudential Indicators

Legislative Update

In December 2021, CIPFA published its revised Prudential Code and Treasury Management Code of Practice following concerns around the commercial activity undertaken by several local authorities and the affordability of borrowing plans.

The Code required authorities to not borrow to invest primarily for financial return and all capital expenditure undertaken must be related to the functions of the authority. The Council has not undertaken any activities to invest for a yield or have any commercial plans within the capital programme.

The Code required the Prudential Indicators (which are approved as part of the Council's Treasury Management Strategy) to be reported quarterly (from semi-annually) as part of the financial updates and will be a recurring addition to the quarterly financial reports.

Prudential Indicators

The Council has a significant borrowing requirement and balance and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of risk remains central to the Council's treasury management strategy.

Prudential indicators have been calculated using the capital programme data as at quarter two of 2024/25 (August 2024 Forecast) and a forecasted spend as at 31 March 2025.

Capital Expenditure & Financing at Q2 2024/25 (£m)	2023/24	2024/25	2025/26	2026/27	2027/28	Total 2024/25-2027/22
	Actual	Estimated	Estimated	Estimated	Estimated	
Corporate Landlord	10.0	16.2	20.6	14.2	28.2	79.3
Housing GF	99.4	81.9	75.7	30.7	3.6	192.0
Schools	11.7	20.1	16.6	30.0	3.5	70.2
Regeneration	4.5	64.3	73.4	23.1	28.4	189.2
Public Realm	25.1	24.5	11.9	2.3	1.0	39.7
South Kilburn	18.9	33.6	3.9	3.9	0.0	41.4
St Raphael's	0.6	0.5	3.2	3.9	12.5	20.0
HRA	42.8	52.2	96.6	32.7	10.5	192.1
Total Capital Expenditure	213.0	293.5	301.9	140.8	87.8	823.9
Financed By:						
Grants	57.3	46.4	23.5	7.3	3.3	80.4
Section 106	8.9	26.3	16.6	0.0	0.0	42.9
Capital Receipts	4.9	1.8	28.2	23.3	26.1	79.4
Earmarked Reserves	0.9	2.5	0.1	1.4	0.0	3.9
Major Repairs Reserve	10.4	22.9	21.4	0.0	0.0	44.3
Revenue Contributions	9.0	10.6	1.7	7.7	0.5	20.5
Borrowing	121.5	183.1	210.4	101.2	57.9	552.5
Total Capital Financing	213.0	293.5	301.9	140.8	87.8	823.9

(a) Capital Financing Requirement (CFR)

The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement. This is the amount of the Capital Programme that is funded by borrowing. The Council's maximum external borrowing requirement for 2024/25 is shown in the table below. The indicator is set to ensure that the level of proposed capital expenditure remains within sustainable limits and to consider the impact on Council tax and in the case of the HRA, housing rent levels.

CFR Movement at Q2 2024/25 (£m)	2023/24	2024/25	2025/26	2026/27	2027/28
	Actual	Estimated	Estimated	Estimated	Estimated
Opening CFR	1,139.6	1,236.6	1,398.2	1,584.8	1,660.2
Capital Expenditure	213.0	293.5	301.9	140.8	87.8
External Resources	(66.3)	(72.6)	(40.1)	(7.3)	(3.3)
Internal Resources	(25.3)	(37.7)	(51.4)	(32.3)	(26.6)
MRP	(18.1)	(20.5)	(22.8)	(24.7)	(26.8)
Capital Loans Repaid	(0.9)	(0.9)	(1.0)	(1.1)	(1.2)
Accounting Adjustments	(5.5)	0.0	0.0	0.0	0.0
Closing CFR	1,236.6	1,398.2	1,584.8	1,660.2	1,690.0

External resources consist of grants and Developer contributions. Internal resources consist of use of reserves; capital receipts and revenue contributions.

(b) Gross Debt and the Capital Financing Requirement

To ensure that over the medium term, debt will only be for a capital purpose, the Council should ensure that debt does not, except in the short term, exceed the total of capital financing requirement in the preceding year plus the estimates of any additional capital financing requirement for the current and next two financial years. This is a key indicator of prudence. The table below shows that the Council expects to comply with this recommendation during 2024/25.

Gross Debt & the Capital Financing Requirement at Q2 2024/25 (£m)	2023/24	2024/25	2025/26	2026/27	2027/28
	Actual	Estimated	Estimated	Estimated	Estimated
External Loans	814.3	909.1	1,064.7	1,134.6	1,159.5
PFI & Leases	11.4	11.7	11.5	9.6	10.0
Total External Debt Liabilities	825.6	920.8	1,076.2	1,144.2	1,169.5
Internal Borrowing	411.0	477.5	508.7	516.0	520.6
Capital Financing Requirement	1,236.6	1,398.2	1,584.8	1,660.2	1,690.0

(c) Liability Benchmark

The liability benchmark is an important tool to help establish whether the Council is likely to be a long-term borrower or long-term investor in the future, and so shape its strategic focus and decision making. The liability benchmark itself represents an estimate of the cumulative amount of external borrowing the Council must hold to fund its current capital and revenue plans while keeping treasury investments at the minimum level required to manage day-to-day cash flow.

Liability Benchmark at Q2 2024/25 (£m)	2023/24	2024/25	2025/26	2026/27	2027/28
	Actual	Estimated	Estimated	Estimated	Estimated
Loans CFR	1,236.6	1,398.2	1,584.8	1,660.2	1,690.0
Less Balance Sheet Resources	(470.5)	(470.5)	(470.5)	(470.5)	(470.5)
Net Loan Requirement	766.1	927.8	1,114.4	1,189.7	1,219.6
Plus, Liquidity Allowance	20.0	20.0	20.0	20.0	20.0
Liability Benchmark	786.1	947.8	1,134.4	1,209.7	1,239.6

(d) Authorised limit and Operational Boundary for External Debt

The Operational Boundary for External Debt is based on the Council's estimate of most likely i.e. prudent, but not worst-case scenario for external debt. It links directly to the Council's estimates of capital expenditure, the capital financing requirement and cash flow requirements and is a key management tool for in-year monitoring.

Other long-term liabilities comprise finance leases, Private Finance Initiative contracts and other liabilities that are not borrowing but form part of the Council's debt.

The Authorised Limit for External Debt is the affordable borrowing limit determined in compliance with the Local Government Act 2003. It is the maximum amount of debt that the Council can legally owe. The authorised limit provides headroom over and above the operational boundary for unusual cash movements.

Authorised Limit at Q2 2024/25 (£m)	2023/24	2024/25	2025/26	2026/27	2027/28
Authorised Limit	1,700.0	1,700.0	1,800.0	1,900.0	1,900.0
Operational Boundary	1,500.0	1,500.0	1,600.0	1,700.0	1,700.0

The Corporate Director for Finance and Resources confirms that there were no breaches to the Authorised Limit and the Operational Boundary during Quarter one of 2024/25.

(e) Upper Limits on one-year revenue impact of a 1% movement in interest rates

This indicator is set to control the Council's exposure to interest rate risk. The impact of a change in interest rates is calculated on the assumption that maturing loans in the current year will be replaced at current rates.

	2024/25	2024/25
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Upper Limits on one-year revenue impact of a 1% movement in interest rates on Maturing Debt at Q2 2024/25 (£m)	Approved Limit	Actual
Upper limit on one-year revenue impact of a 1% rise in interest rates	5.0	0.8
Compliance with limits:		Yes
Upper limit on one-year revenue impact of a 1% fall in interest rates	5.0	(0.8)
Compliance with limits:		Yes

(f) Maturity Structure of Fixed Rate Borrowing

This indicator is to limit large concentrations of fixed rate debt needing to be replaced at times of uncertainty over interest rates. The Council uses the option date as the maturity date for its LOBO loans. Loans based on existing debt portfolio as at the reported period.

Maturity Structure of Fixed Rate Borrowing at Q2 2024/25	Upper Limit	Lower limit	2024/25	2024/25	2024/25	2024/25	2024/25
			Actual Borrowing	Actual Borrowing	Actual Borrowing	Actual Borrowing	Compliance with limits
	%	%	£m	%	£m	%	
Under 12 months	40.0	0.0	59.6	7.5%	48.7	6.7%	Yes
12 months & within 24 months	40.0	0.0	48.7	6.2%	23.2	3.2%	Yes
24 months and within 5 years	40.0	0.0	47.0	5.9%	37.5	5.1%	Yes
5 years and within 10 years	60.0	0.0	73.4	9.3%	72.9	10.0%	Yes
10 years and within 20 years	75.0	0.0	144.3	18.3%	132.1	18.1%	Yes
20 years and within 30 years	75.0	0.0	122.3	15.5%	133.5	18.3%	Yes
30 years and within 40 years	75.0	0.0	189.3	24.0%	177.1	24.3%	Yes
Over 40 years	75.0	0.0	105.0	13.3%	105.0	14.4%	Yes
Total			789.6	100.0%	730.0	100.0%	

(g) Ratio of Financing Costs to Net Revenue Stream

This is an indicator of affordability and highlights the revenue implications of existing and proposed capital expenditure by identifying the proportion of the revenue budget required to meet financing costs, net of investment income.

Financing Costs to Net Revenue Stream at Q2 2024/25	Limit	Forecast	Forecast	Forecast	Forecast
	2024/25	2024/25	2025/26	2026/27	2027/28
Financing Costs (Interest & MRP) (£m)	39.1	27.5	33.3	37.5	39.5
Net Revenue Stream (£m)	383.3	387.0	395.0	407.3	420.1
Proportion of net revenue stream (%)	10.2%	7.1%	8.4%	9.2%	9.4%

Financing costs can be further broken down as follows.

Capital Financing Costs at Q2 (£m)	2023/24	2024/25	2025/26	2026/27	2027/28
	Actual	Estimated	Estimated	Estimated	Estimated
Total Gross External Debt Interest	30.3	36.8	41.6	47.0	49.7
Total Interest Payable & Expenses	33.6	39.2	43.4	48.3	50.9
Total Interest Receivable	(24.5)	(27.1)	(27.8)	(30.7)	(33.0)
Net Interest	9.1	12.0	15.5	17.6	18.0
MRP (Excluding PFI)	13.4	15.5	17.8	19.9	21.5
Total Interest & MRP	22.4	27.5	33.3	37.5	39.5
Revenue Contributions to Capital Programme	8.5	9.0	9.5	4.0	4.0
Revenue Contribution from Service Area (Parking)	(0.5)	(0.5)	(0.5)	(0.5)	(0.5)
Total Capital Financing Costs	30.4	36.0	42.3	41.0	43.0
Total Budget	25.0	26.2	27.4	26.6	26.8
Variance	(5.4)	(9.8)	(14.9)	(14.3)	(16.1)

(h) Upper Limit for Total Principal Sums invested over 364 Days

The purpose of this limit is to contain exposure to the possibility of loss that may arise as a result of the Council having to seek early repayment of the sums invested.

	2023/24	2023/24	2024/25	2024/25

Upper Limit for Total Principal Sums invested over 364 Days at Q2 2024/25 (£m)	Approved	Actual	Approved	Actual
Upper Limit for Total Principal Sums Invested Over 364 Days	50.0	0.0	50.0	0.0

(i) Security

The Council has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

Credit Risk Indicator at Q2 2024/25	2023/24	2023/24	2024/25	2024/25
	Approved	Actual	Approved	Actual
Portfolio average credit rating	A	A+	A	A+

(j) Liquidity

The Council has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling three-month period, without additional borrowing.

Liquidity Risk Indicator at Q2 2024/25 (£m)	2023/24	2023/24	2024/25	2024/25
	Approved	Actual	Approved	Actual
Total cash available within 3 months	20.0	95.3	20.0	55.8

(k) Investment Forecast

This indicator demonstrates the Council's investment exposure broken down by category for Treasury and non-treasury investments. Non-Treasury investments are directed under the Council's Investment Strategy 2024/25, whilst treasury investments are managed under the Treasury Management Strategy 2024/25.

Total Investment Exposure Indicator at Q2 2024/25 (£m)	2023/24	2024/25	2025/26	2026/27	2027/28
	Actual	Estimated	Estimated	Estimated	Estimated
Treasury management cash investments	95.3	20.0	20.0	20.0	20.0
Service investments: Loans	285.6	284.5	283.3	269.1	267.7
Commercial investments: Property	0.0	0.0	0.0	0.0	0.0
Total Investments	380.9	304.5	303.3	289.1	287.7
Commitments to lend	50.0	50.0	50.0	50.0	50.0
Total Exposure	50.0	50.0	50.0	50.0	50.0

Service investments are further broken down in the table below.

Loans & Investments for service purposes: Category of borrower at Q2 2024/25 (£m)	2023/24	2024/25	2024/25	2025/26	2026/27	2027/28
	Actual	Approved Limit	Estimated	Estimated	Estimated	Estimated
I4B Subsidiary Loans	182.1	400.0	182.1	182.1	182.1	182.1
I4B Subsidiary Equity	36.4		36.4	36.4	36.4	36.4
FWH Subsidiary Loans	34.3		33.8	33.4	32.9	32.5
Local Businesses	0.2	10.0	0.2	0.2	0.2	0.2
Schools, Academies and Colleges	17.9	55.0	17.6	17.4	16.7	16.5
West London Waste Authority	14.8	20.0	14.4	13.9	0.8	0.0
Local Charities	0	10.0	0	0	0	0
Housing Associations	0	50.0	0	0	0	0
Local Residents	0	5.0	0	0	0	0
Total	285.6	550.0	284.5	283.3	269.1	267.7

(l) Investment Funding

This indicator demonstrates the amount of exposure to borrowing as a result of investments made for service purposes. These investments are the loans to the Council's subsidiaries i4B Holdings Ltd and First Wave Housing Ltd.

Investments Funded by Borrowing at Q2 2024/25 (£m)	2023/24	2024/25	2025/26	2026/27	2027/28
	Actual	Estimated	Estimated	Estimated	Estimated
I4B Loans	218.4	218.4	218.4	218.4	218.4
First Wave Housing (FWH)	34.3	33.8	33.4	32.9	32.5
Total Service investments: Loans	252.7	252.3	251.8	251.4	250.9
Total Funded by Borrowing	252.7	252.3	251.8	251.4	250.9

(m) Investment Rate of Return


This indicator demonstrates the rate of return obtained from the different investment categories.

Investments net rate of return at Q2 2024/25	2023/24	2024/25	2025/26	2026/27	2027/28
	Actual	Estimated	Estimated	Estimated	Estimated
Treasury management investments	5.31%	4.75%	3.00%	3.00%	3.00%
Service investments: Loans	2.40%	2.40%	2.40%	2.40%	2.40%
Commercial investments: Property	0	0	0	0	0

(n) Other Investment Indicators

Other investment indicators	2023/24	2024/25	2025/26	2026/27	2027/28
	Actual	Estimated	Estimated	Estimated	Estimated
External Debt (Loans)	814.3	893.9	1,037.6	1,105.1	1,133.1
Net Service Expenditure	358.4	387.0	395.0	407.3	420.1
Debt to net service expenditure ratio	2.3	2.3	2.6	2.7	2.7
Commercial income as a % of net service expenditure ratio	0.0	0.0	0.0	0.0	0.0

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 Brent	Resources and Public Realm Scrutiny Committee 5 November 2024
	Report from the Deputy Director, Democratic Services
Scrutiny Recommendations Tracker	

Wards Affected:	All
Key or Non-Key Decision:	Non-Key Decision
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	Appendix A – Scrutiny Recommendations Tracker
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Jason Sigba, Strategy Lead – Scrutiny, Law & Governance 020 8937 2036 Jason.Sigba@brent.gov.uk Amira Nassr, Deputy Director, Democratic Services, Law & Governance 020 8937 5436 Amira.Nassr@brent.gov.uk

1.0 Executive Summary

1.1 The purpose of this report is to present the Scrutiny Recommendations Tracker to the Resources and Public Realm Scrutiny Committee.

2.0 Recommendation(s)

2.1 That the progress of any previous recommendations, suggestions for improvement, and information requests of the Committee be noted (Appendix A).

3.0 Detail

3.1 Contribution to Borough Plan Priorities & Strategic Context

3.1.1 Borough Plan 2023-2027 – all strategic priorities.

3.2 Background

- 3.2.1 The Recommendations Tracker tabled at the 5 November 2024 meeting relates to the current municipal year (2024/25). However, it also includes updates from the 24 January 2024 meeting on the item regarding Budget Scrutiny (2023/2024 municipal year).
- 3.2.2 In accordance with Part 4 of the Brent Council Constitution (Standing Orders of Committees), Brent Council scrutiny committees may make recommendations to the Full Council or the Cabinet with respect to any functions which are the responsibility of the Executive, or of any functions which are not the responsibility of the Executive, or on matters which affect the borough or its inhabitants.
- 3.2.3 The Resources and Public Realm Scrutiny Committee may not make executive decisions. Scrutiny recommendations therefore require consideration and decision by the appropriate decision maker; the Cabinet or Full Council for policy and budgetary decisions.
- 3.2.4 The Scrutiny Recommendations Tracker provides a summary of any scrutiny recommendations made to Cabinet/Full Council/external stakeholders and implementation progress. It also includes suggestions for improvement and information requests to council departments/external stakeholders, as captured in the minutes of the committee meetings.
- 3.2.5 Recommendations, suggestions for improvement, and information requests are removed from the tracker when they have either been actioned or rejected.

4.0 Procedure for Recommendations from Scrutiny Committees

- 4.1 Where scrutiny committees make recommendations to the Cabinet, these will be referred to the Cabinet (and/or relevant cabinet member/s) requesting an Executive Response. If relevant, the item will be published on the Council's Forward Plan.
- 4.2 Regarding recommendations to Full Council (e.g. in the case of policy and budgetary decisions), the same process will be followed, where a report containing the scrutiny recommendations will then be forwarded to Full Council alongside the Cabinet's responses to those recommendations.
- 4.3 Where scrutiny committees have powers under their terms of reference to make reports or recommendations to external decision makers (e.g. NHS bodies), the relevant external decision maker shall be notified in writing, providing them with a copy of the respective Committee's report and recommendations, and requesting a response.
- 4.4 Once responses are received, they will be added to the Recommendations Tracker for review and consideration.

5.0 Stakeholder and ward member consultation and engagement

- 5.1 None for the purposes of this report.

6.0 Financial Considerations

6.1 There are no financial considerations for the purposes of this report.

7.0 Legal Considerations

7.1 Section 9F, Part 1A of the Local Government Act 2000, *Overview and scrutiny committees: functions*, requires that Executive arrangements by a local authority must ensure that its overview and scrutiny committees have the power to make reports or recommendations to the authority or the executive with respect to the discharge of any functions which are or are not the responsibility of the executive, or on matters which affect the Authority's area or the inhabitants of that area.

7.2 Section 9FE, *Duty of authority or executive to respond to overview and scrutiny committee*, requires that the authority or executive;-
(a) consider the report or recommendations,
(b) respond to the overview and scrutiny committee indicating what (if any) action the authority, or the executive, proposes to take,
(c) if the overview and scrutiny committee has published the report or recommendations, publish the response, within two months beginning with the date on which the authority or executive received the report or recommendations.

8.0 Equity, Diversity & Inclusion (EDI) Considerations

8.1 There are no EDI considerations for the purposes of this report.

9.0 Climate Change and Environmental Considerations

9.1 There are no climate change and environmental considerations for the purposes of this report.

10.0 Communication Considerations

10.1 There are no communication considerations for the purposes of this report.

Report sign off:

Amira Nassr
Deputy Director, Democratic Services

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Appendix A

Resources and Public Realm Scrutiny Committee (RPRSC) Recommendations Tracker 2024/25

The Recommendations Tracker is a standing item on committee agendas, and documents the progress of scrutiny recommendations, suggestions for improvement, and information requests made by the Resources and Public Realm Scrutiny Committee at its public meetings and as part of task and finish group reviews. Scrutiny recommendations, suggestions for improvement, and information requests will not be removed from the tracker until full responses have been provided to the Committee by either the Cabinet, Full Council, council departments, and/or external partners.

Recommendations to Cabinet from RPRSC

Subject	Scrutiny Recommendation	Cabinet Member, Lead Officer/s, and Department	Executive Response	Review date
<p>24 Jan 2024 – Budget Scrutiny Task Group Findings (2024/25 and 2025/26)</p>	<p>Improve budget communications:</p> <p>Include a concise, summary page in the Budget (and in future budgets), adopting more accessible language which makes it clear what its vision, aims, and priority protection areas are.</p>	<p>Cllr Muhammed Butt – Leader of the Council</p> <p>Cllr Mili Patel - Deputy Leader, Cabinet Member for Finance & Resources</p> <p>Minesh Patel – Corporate Director, Finance & Resources</p> <p>Rob Mansfield – Head of Communications, Conference, & Events, Partnerships, Housing, & Resident Services</p>	<p>Response received on 09/07/24:</p> <p>This recommendation is agreed. The Chair of the Resources and Public Realm Scrutiny Committee will be invited to meet with the Head of Communications and the Leader of the Council, to provide feedback on the previous communications campaign to support the budget consultation.</p> <p>It will also provide an opportunity for members of the Scrutiny Committee to present any suggestions for improvements on future campaigns.</p> <p>The Cabinet Member foreword will summarise the budget proposals for 2025/2026 in a one-page format and additional materials such as an infographic will be produced to support Members.</p> <p>Updated response received on 28/10/24:</p>	<p>05/11/2024</p>

			<p>A full Communications and Engagement Plan is now in development for the Budget Consultation for 2025/2026.</p> <p>The purpose of this communications and engagement plan is to:</p> <ul style="list-style-type: none">• Provide context which explains the council's current budget situation and pressures in simple and accessible formats that are easy for people without a financial background to understand.• Inform key audiences regarding the savings proposals and generate feedback on the savings needed to set a balanced budget.• Gather insights from residents, partners and stakeholders to refine the final draft Budget report.• Set out the high-levels plans around how the council intends to change in future years given the ongoing financial situation. <p>Both Chairs of the respective Scrutiny committees have been invited to meet with the Leader and the Head of Communications to provide further feedback on the development of the Communications and Engagement Plan for the budget consultation.</p>	
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	<p>Shared Outcomes Framework:</p> <p>Explore a shared-outcomes framework with the voluntary sector for the benefit of residents/service users. As part of this work, the Council should urgently discuss and collaborate with the Voluntary and Community Sector (VCS) in relation to budget proposals that involve them and/or may have an impact on their service provision.</p> <p>This discussion could build on the Task Group's recommendation from the Budget Scrutiny Task Group Review 2023/24 which suggested a collaborative strategy with the VCS to enable these organisations to identify and secure new income streams.</p>	<p>Cllr Muhammed Butt – Leader of the Council</p> <p>Cllr Mili Patel - Deputy Leader, Cabinet Member for Finance & Resources</p> <p>Cllr Fleur Donnelly-Jackson – Cabinet Member for Resident Support & Culture</p> <p>Minesh Patel – Corporate Director, Finance & Resources</p> <p>Peter Gadsdon – Corporate Director, Partnerships, Housing, & Resident Services</p>	<p>Response received on 09/07/24:</p> <p>We are in the early stages of reviewing the (independently) proposed Community Engagement Framework and related recommendations on how we can work more closely with the community, including the voluntary sector in co design, collaboration, and consultation.</p> <p>We will utilise existing quarterly VCS forums to ensure the council has an opportunity to communicate current and near future initiatives to ensure engagement and feedback from the sector.</p> <p>To address the urgent request – it is proposed that an event, with the support of CVS is arranged, to deliver an outline of budget 2024/25 recommendations to support the sector better understand the impact the budget savings will have on them.</p> <p>It is suggested that a mandatory sharing of all planned consultations with the voluntary sector is introduced as part of the wider best practice Consultation at Brent to create a consistent model of engagement cross council with the VCS.</p> <p>Updated response received on 28/10/24:</p> <p>Engaging the Voluntary Community sector is a key part of the emerging Communications and Engagement Plan. As outlined below, an event is being planned to deliver an outline of the budget proposals and explore opportunities to further collaborate with the council.</p>	<p>05/11/2024</p>
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			On the 25 th of September Brent Council delivered a “Meet the Funders” event alongside Wembley Stadium and CVS Brent. This sold-out event was an opportunity for voluntary groups to explore funding opportunities and secure new income streams from a range of different enterprises.	
	<p>Establish a strategic approach to income generation:</p> <p>Develop a longer-term, strategic approach to income generation (accompanied with yearly action plans) rather than focusing on piecemeal proposals year to year.</p> <p>The strategy should include a robust monitoring process that enables holistic working across all departments to create synergies for income generation.</p> <p>Specifically, allocating a dedicated, cross-departmental resource to work across the Council to investigate and identify additional opportunities for income generation e.g. compliance with mandatory HMO licensing, compliance with council tax on empty properties, and business rates evasion.</p>	<p>Cllr Muhammed Butt – Leader of the Council</p> <p>Cllr Mili Patel - Deputy Leader, Cabinet Member for Finance & Resources</p> <p>Minesh Patel – Corporate Director, Finance & Resources</p>	<p>Response received on 09/07/24:</p> <p>The council has an Income and Debt board that reviews all income and debt across the council.</p> <p>It is proposed to amend the terms of reference of this board to ensure there is a consistent approach to income generation across the council, consider opportunities for new income generation and benchmarking.</p> <p>As always, if members have any areas where they wish Cabinet Members to explore alternative areas that could lead to additional income generation, please let us know.</p> <p>Updated response received on 28/10/24:</p> <p>This works remains imperative and is ongoing considering the financial pressures that the council continues to face. An explicit aspect of the recently approved (at Cabinet in September) Property Strategy is to ensure that the council receives a sustainable rental income through its portfolio of assets in the years to come.</p> <p>As we continue to navigate through a period of scarce resources and environmental challenges, the strategic context in 2024</p>	05/11/2024

			highlights the need for a balanced approach that aligns community expectations and financial sustainability, and ensures our property portfolio is well maintained, accessible, inclusive, environmentally resilient, and compliant with all regulations.	
	<p>Implement additional shared service arrangements:</p> <p>Explore further opportunities for shared service arrangements, learning lessons from current arrangements and from good practice of the shared service models that already exist across the country.</p>	<p>Cllr Muhammed Butt – Leader of the Council</p> <p>Cllr Mili Patel - Deputy Leader, Cabinet Member for Finance & Resources</p> <p>Minesh Patel – Corporate Director, Finance & Resources</p>	<p>Response received on 09/07/24:</p> <p>A good example of a successful shared service arrangement in Brent is the Shared Technology Service.</p> <p>A report that sets out lessons learned from current arrangements and good practice will be organised so that it can be shared with senior management.</p> <p>Where appropriate, any opportunities for considering such arrangements can be considered as part of future budget challenge meeting.</p> <p>Updated response received on 28/10/24:</p> <p>This recommendation is still under development, but we will always explore any opportunities as they arise. We welcome any feedback from the committee on areas which should be considered for prospective shared service arrangements; when the respective procurement window is reached.</p>	05/11/2024

	<p>Wembley Stadium: 'Community Impact' Ticket Levy:</p> <p>Explore options with the Stadium for a ticket levy, whereby the Council receives a proportion of each ticket sale in order to fully recover costs incurred or to provide for further enhancement of the Council's event day operations.</p>	<p>Cllr Muhammed Butt – Leader of the Council</p> <p>Cllr Mili Patel - Deputy Leader, Cabinet Member for Finance & Resources</p> <p>Kim Wright – Chief Executive</p> <p>Minesh Patel – Corporate Director, Finance & Resources</p>	<p>Response received on 09/07/24:</p> <p>As part of our partnership working with Wembley Stadium, the council does receive funding to ensure that our highways, enforcement, and clean-up costs are reimbursed. A proportion of the income derived from ticket sales is also awarded to Wembley National Stadium Trust, who in turn invest in and around Brent.</p> <p>The Leader of the Council and the Chief Executive, Kim Wright will also raise this recommendation with the senior Leadership team at the Wembley Stadium/Football Association and Ovo Arena.</p> <p>We are reviewing the announcements of Cambridge City Council and Manchester City Council relating to a Tourism Levy to understand whether the initiative could be replicated, with our existing legal powers in Brent and more widely across London, as this might be better suited to a regional rather than local approach.</p> <p>Updated response received on 28/10/24:</p> <p>This recommendation will be raised with the senior leadership team at Wembley Stadium.</p> <p>Linked to this are the emerging campaigns for a Tourism Levy or Tax. At present, in England, neither the central government nor local councils have the power to introduce a tourist tax. Primary legislation would be required to permit this.</p>	<p>05/11/2024</p>
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			<p>Manchester and Liverpool city councils introduced a tourism-based Business Improvement District (BID) as of 1 April 2023. This is a legal workaround, using existing legal powers, to establishing a form of tourist tax.</p> <p>No council in London is yet to do this, but London Councils as the representative body continues to engage with London's business community to explore any further opportunities to replicate such a model.</p> <p>There is more information on the House of Commons Library here: https://commonslibrary.parliament.uk/tourist-taxes-in-the-uk/#:~:text=A%20tourist%20tax%20normally%20takes,of%20the%20bed%20or%20room.</p>	
	<p>Delegation of budgets and decision making to Brent Integrated Care Partnership (ICP):</p> <p>Continue to advocate and make the case to North West London Integrated Care Board (NWL ICB) for both a better alignment of NHS resources to population need and for an increased delegation of budgets and decision making to Brent Integrated Care Partnership (ICP).</p>	<p>Cllr Muhammed Butt – Leader of the Council</p> <p>Cllr Mili Patel - Deputy Leader, Cabinet Member for Finance & Resources</p> <p>Cllr Neil Nerva – Cabinet Member for Community Health & Wellbeing</p> <p>Minesh Patel – Corporate Director, Finance & Resources</p> <p>Rachel Crossley – Corporate Director, Community Health & Wellbeing</p>	<p>Response received on 09/07/24:</p> <p>NWL ICB are continuing to develop common-core specifications for all health services across NWL. Brent ICP are involved through various routes in developing these specifications. Whilst Brent is anticipated to be a net beneficiary in terms of investment resulting from this work, it is expected that only new funding will flow disproportionately to Brent, which is likely to mean that any significant improvement will be slow.</p> <p>Brent ICP has developed detailed business cases for investment into key gaps in provision. In particular for special school nursing, mental health access in NW2 and NW10 and childhood continence where there are significant immediate gaps in provision. NWL MH Exec have agreed to fund £850,000</p>	05/11/2024

			<p>new investment in MH (pending ICB Exec approval), and Brent ICP have agreed to use non-recurrent S256 funding to meet the gaps in provision pending decisions from NWL.</p> <p>Our focus for 2024/25 will be for additional investment into community health services, where there are significant gaps in provision, including district and community nursing, as well as securing existing additional investment through the Better Care Fund. We will also continue to work locally through ICP Executive around the additional NWL investment into health inequalities, and use of locally held S256 funding.</p> <p>Updated response received on 28/10/24:</p> <p>The Lead Member for Community Health and Wellbeing has been continuing these conversations with the NWL ICB and has represented this viewpoint at the highest level.</p>	
<p>17 July 2024 – Budget update: Medium Term Financial Strategy</p>	<p>Lobby central government to end the privatisation of Children’s social care services.</p>	<p>Cllr Gwen Grahl – Cabinet Member for Children, Young People & Schools</p> <p>Nigel Chapman – Corporate Director, Children & Young People</p>	<p>Response received on 28/10/24:</p> <p>In the year to 31 March, 103 new council-run children’s homes opened in England, according to the data – a 31% increase on the number of council-run homes operating a year earlier.</p> <p>Overall, at the end of March 404 of 3,491 children’s homes of all types actively operating in England were run by local authorities and 32 homes were run by a voluntary organisation running services on behalf of a local authority.</p> <p>Private providers were running four in five children’s homes with the top 10 largest</p>	<p>05/11/2024</p>

			<p>companies running 26% of all private children's homes, a fall from 30% in 2023. It is clear that we urgently need a national strategy to increase the supply of suitable residential and foster homes across the country, and to address the issues of profiteering which has no place in children's social care.</p> <p>The LGA has previously published reports outlining that the largest independent providers of children's social care brought in profits of more than £300 million last year.</p> <p>The Local Government Association has continued to make the case to both the previous government and today's administration for a better balance of provision to ensure that children are quickly found homes that best suits their needs.</p> <p>In Brent, we are investing £2.2m to create a council-ran residential home, to help children transition to independent living and reduce the cost of placements. This project has the potential to save Brent up to £461,000 a year as it will help cut the distance some children will be sent to find a place. Councils across London are also collaborating on further opportunities to create further council-ran children's residential homes.</p> <p>On the 5th October the Lead Member alongside counterparts from across London wrote to the government calling on them to provide: "urgent action to end profiteering in this market, and to ensure councils have the resources they need to protect the most vulnerable children."</p>	
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	<p>As part of work with London Councils, lobby for a greater co-ordinated approach between local authorities in the commissioning of services that curbs profiteering by private companies, creates new insourcing opportunities, enables mission-led procurement outcomes, and that delivers greater cost efficiencies overall.</p>	<p>Cllr Jake Rubin – Cabinet Member for Employment, Innovation & Climate Action</p> <p>Cllr Neil Nerva – Cabinet Member for Community Health & Wellbeing</p> <p>Cllr Gwen Grahl – Cabinet Member for Children, Young People & Schools</p> <p>Rachel Crossley – Corporate Director, Community Health & Wellbeing</p> <p>Nigel Chapman – Corporate Director, Children & Young People</p>	<p>Response received on 28/10/24:</p> <p>This recommendation is ongoing both at a political and officer level through London Councils and the Association of London, Directors of Children’s Services. The ALDCS also manage the London Innovation and Improvement Alliance and London Social Work for Children.</p> <p>One aspect of the work of the London Innovation and Improvement Alliance is to explore further opportunities in relation to commissioning.</p> <p>The Commissioning Priority Workstream is led by Barnet Council and is supported by the Pan-London Placements Commissioning Panel.</p> <p>The Pan-London Placement Commissioning Programme is taking forward a range of projects to improve placement sufficiency, quality and value for money for London local authorities in order to improve outcomes for London children.</p> <p>More information on this range of projects here: https://www.liia.london/priority-areas/resources-commissioning/</p> <p>Further work is also underway to address London Borough’s reliance on agency social workers. The London Pledge is a collective agreement between London’s borough’s and contains the following commitments in relation to workforce:</p> <ul style="list-style-type: none"> ▪ Pay rates: Commit to working within the London Pledge’s pay rates and 	05/11/2024
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			<p>protocols, which are reviewed annually</p> <ul style="list-style-type: none"> ▪ Data collection: Provide accurate and complete data to the London Council's HR Metrics Service quarterly ▪ Headhunting: Avoid headhunting staff from other signatory boroughs, unless for a promotional role ▪ Agency supply chain: Work with the agency supply chain to support permanent recruitment ▪ Balanced workforce: Work together to establish a more balanced social worker workforce across London <p>More information on the London Pledge is available here: https://www.liia.london/london-pledge/</p>	
	<p>Continue lobbying efforts for the urgent reform of local government finance that provides local authorities with greater options for how they raise and spend their resources (e.g. fiscal devolution options leading to more freedoms over local revenues such as 100% business rates retention and flexible use/spend of community infrastructure levy (CIL) monies).</p>	<p>Cllr Muhammed Butt – Leader of the Council</p> <p>Cllr Shama Tatler - Deputy Leader, Cabinet Member for Regeneration, Planning & Growth</p> <p>Alice Lester – Corporate Director, Neighbourhoods & Regeneration</p>	<p>Response received on 28/10/24:</p> <p>This work remains ongoing through London Councils as the body which represents London Boroughs on a national stage. The Lead Member has also written to the relevant Minister, calling for reform and flexibility of the use of Community Infrastructure Levy monies.</p> <p>The lobbying priorities for London and the reform of local government finance are set out below:</p> <p><i>The stabilisation of local government finances is London boroughs' top priority. Without stability, it will be near-impossible for boroughs to drive economic growth, invest in prevention or address the housing crisis facing London.</i></p>	<p>05/11/2024</p>

			<p>Our asks to government:</p> <ul style="list-style-type: none">▪ <i>Increase Core Spending Power by 7% in real terms in 2025-26—broadly in line with this year’s increase—to close the £700 million funding gap London boroughs face.</i>▪ <i>Extend the statutory override on the Dedicated Schools Grant beyond 2026 and commit to reforms to eliminate the high needs deficits.</i>▪ <i>Combine existing Social Care Grants into fewer grants.</i>▪ <i>Distribute the Social Care Grant using measures of relative need for adult and children’s social care.</i>▪ <i>Combine other non-ringfenced grants and distribute based on relative need (e.g. population and deprivation).</i>▪ <i>Implement three-year minimum Local Government Finance Settlements and publish them as early as possible.</i>▪ <i>Launch a Fair Funding Review of relative needs and resources as soon as possible.</i>	
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Suggestions for improvement from RPRSC to Council departments/partners

Meeting date and agenda item	Suggestion for improvement	Council Department/External Partner	Response / Status
6 Sept 2023 – Planning Enforcement	Undertake an audit to determine the wards with the highest amount of planning breach complaints, and the wards with the highest amount of enforcement activity. This intelligence should be used to develop a targeted strategy to prevent planning breaches e.g. targeted planning education and/or communications campaigns etc. The Audit should also categorise the types of breaches receiving enforcement notices.	Gerry Ansell – Director, Inclusive Regeneration & Employment, Neighbourhoods & Regeneration	<p>Response received on 24/10/23:</p> <p>We will look to do this but are currently waiting for our new software to be introduced. Currently scheduled for April 2024.</p> <p>Updated response received on 11/04/24:</p> <p>There has been a delay on the implementation of the new software. Testing is now not going to take place until June 2024 and go live is unlikely to take place until Autum 2024. Therefore we will not be in a position to produce this information until February 2025.</p>
27 Feb 2024 – Draft Property Strategy	Upon completion, sight the Committee on the draft Corporate Social Benefits Assessment Methodology for feedback.	<p>Tanveer Ghani – Director, Property & Assets, Finance & Resources</p> <p>Rhodri Rowlands – Director of Strategic Commissioning & Capacity Building, Community Health & Wellbeing</p>	<p>Response received on 12/04/2024:</p> <p>The council is currently reviewing its social value approach at an organisational level and the property strategy will fit into the wider organisational approach to community wealth building and social value. This ensures consistency and enables the property strategy to align with broader council objectives. The development of the assessment methodology itself falls outside of the Property and Assets Team's direct remit, consequently, at this stage we do not have immediate access to the specific details of the methodology. However, once the approach becomes clearer, we will get back in contact with further information about who can consider the recommendation.</p> <p>Updated response received on 01/11/2024:</p> <p>A review of the council's social value approach is now in progression and linked into the strategic change programme. This includes a review of the council's current Social Value Policy and a refresh of the council's priorities for social value contributions to ensure they maximise the opportunity to align supplier contributions to areas of most impact. Additional enabling areas of work are</p>

			also being developed including a social value charter and redesign of the council's social value method statement. This will include specific consideration of property and assets with link to this strategy. Opportunities are also being identified through which pilot activity can be implemented to test application of social value in respect of property and assets. For example, this maybe through consideration of rent incentivisation schemes. A working group linked to the Change Programme will provide ongoing oversight.
	Upon completion, publish the final Corporate Social Benefits Assessment Methodology for the benefit of residents, businesses, and community organisations.	To be confirmed. Rhodri Rowlands – Director of Strategic Commissioning & Capacity Building, Community Health & Wellbeing	Awaiting response.
23 Apr 2024 – Regeneration in Brent	Provide a member briefing session on viability assessments, covering key topics such as affordable housing and social value.	Gerry Ansell – Director of Inclusive Regeneration & Employment, Neighbourhoods & Regeneration	Response received on 19/06/24: This is currently offered to members of the Planning Committee as part of their training and can be extended to all members. David Glover Head of Planning and Victoria McDonagh Development Management Manager have been tasked with bringing this action into effect and this is targeted for Sept 2024. Updated response received on 28/10/24: The member training session has been booked to take place on the evening of Monday 4 November 2024.
4 Sept 2024 – Review of Year 1 of the Grounds Maintenance Contract with	Publish a user-friendly summary of the annual report for residents highlighting expected standards, performance, key achievements, challenges, and priorities of the Grounds Maintenance contract.	Chris Whyte – Director, Public Realm, Neighbourhoods & Regeneration	Response received on 29/10/24: A full annual report has been published internally. Parks Service will work with the web team to publish a user-friendly summary that can be published online by the beginning of December.
	Improve coordination and scheduling between Continental Landscapes and Veolia for verge	Chris Whyte – Director, Public Realm, Neighbourhoods & Regeneration	Response received on 29/10/24: A discussion has already taken place between Continental, Parks and the Head of Service for the Waste Contract to understand which areas of the borough are

Continental Landscapes	cutting and street cleansing operations across the borough.		perceived to be an issue with regards litter clearance from highways verges. This is an ongoing fluid process to ensure that both contractors are clear as to the responsibilities of the other.
	Work more closely with probation and community payback teams to create a focused work programme for offenders, exploring opportunities for relevant training and skills development.	Chris Whyte – Director, Public Realm, Neighbourhoods & Regeneration	Response received on 29/10/24: The Parks Service is working with Community Payback (CP) currently with them about to commence work in Monks Park. The Service is also working with CP mobile teams to understand the options for allotment plot clearance work in 2025.
	Enhance communication and collaboration with volunteer groups (e.g., 'Friends Of' groups, Thames 21, etc.)	Chris Whyte – Director, Public Realm, Neighbourhoods & Regeneration	Response received on 29/10/24: Following Scrutiny, Continental reached out to the Gladstone Copse Group to resolve the situation that was mentioned. Continental continue to work with Friends of Groups and improve that relationship. They immediately delivered the London in Bloom certificates to each volunteer group following the awards this year. Partnership working is reviewed monthly.
	Consider introducing larger and more varied bins in problem areas in parks/open spaces to reduce littering and fly-tipping.	Chris Whyte – Director, Public Realm, Neighbourhoods & Regeneration	Response received on 29/10/24: The Parks Service have had a meeting with Big Belly Bins on the 17 th October and there is now an opportunity to rent a bin for 6 months. Costs are in the process of being assessed to see if they are viable for a trial. Big Belly Bins are large, sealed bins that allow for monitoring of fill levels. The cost for one bin is over £4000, which is cost prohibitive. However, they can be rented for £85 a month for a minimum of 6 months. The first step is to arrange a demonstration with Continental in their depot by January 2025 to understand whether their crews can empty the bins with current vehicles before considering any trial.
4 Sept 2024 – Delivery of Affordable Housing by i4B	Explore further opportunities for i4B/First Wave Housing Ltd to reduce temporary accommodation costs and expand the supply of affordable housing in a sound yet non-risk adverse manner.	Alice Lester – Corporate Director, Neighbourhoods & Regeneration	Response received on 07/10/24: Discussions have taken place with the council as Shareholder of i4B/Guarantor of First Wave Housing (FWH) regarding future loan funding to finance further i4B acquisitions. The Shareholder/Guarantor and companies remain committed to exploring all viable and suitable opportunities to increase affordable housing supply.

Holdings Ltd and First Wave Housing Ltd			<p>The council has recently received grant funding through the Local Authority Housing Fund (LAHF) for the council to purchase properties from the market to be used as Temporary Accommodation. Due to potential overlap in the properties being considered under the LAHF and by i4B, there may be a reduction in the opportunities available to i4B over the next 1-2 years. That said, i4B – and FWH where appropriate – are expected to be able to continue to acquire properties, subject to interest rates and market conditions remaining favourable, and bring further new supply and benefits in reducing the use of Temporary Accommodation.</p>
	<p>Consider revising the viability assessment criteria to account for factors like temporary accommodation cost avoidance in order to support the delivery of more affordable housing via i4B/First Wave Housing Ltd.</p>	<p>Amanda Healy – Deputy Director, Investment & Infrastructure, Finance & Resources</p>	<p>Response received on 07/10/24:</p> <p>While housing households via i4B properties does reduce the council's spend on Temporary Accommodation (classed as cost avoidance), this is not a direct benefit to i4B and the company can therefore not factor this into its financial assessments for determining whether acquisitions are viable. As i4B is not benefiting from any actual cost savings, and the company is a separate legal entity with its own accounts and financial statements, it would be inappropriate for any savings achieved by the council to impact i4B's financial modelling. However, the council and i4B will continue to report on the savings achieved to the council group through cost avoidance to demonstrate the ongoing benefits of the work of the company.</p>

	Explore carrying out targeted work to source/purchase specific properties for households wishing to downsize and relocate outside of the borough.	Alice Lester – Corporate Director, Neighbourhoods & Regeneration	<p>Response received on 07/10/24:</p> <p>As the majority of families have been housed in recent years, their properties will generally still meet their specific needs and they are therefore unlikely to wish to downsize. However, the Strategic Housing team does work with a small number of families wishing to downsize.</p> <p>As part of this, i4B has carried out pilot projects in the past to explore purchasing accommodation to meet the requirements of specific clients. This has proven difficult and is generally challenging to make work due to i4B being unable to match price expectations from sellers. However, i4B has recently sourced and acquired a property to meet the specific needs of a resident in South Kilburn, and going forward will make efforts to carry out similar work in exceptional circumstances, including out-of-borough acquisitions. However, any acquisitions would need to take place in areas where i4B and FWH already have a housing management service in place. Specifically, this is in Brent and neighbouring London boroughs via Brent’s Housing Service and in certain of the Home Counties and other London boroughs to the north and west of Brent via i4B’s contract with Mears. Any acquisitions outside of this area would be unfeasible for reasons of cost, administration and service delivery oversight.</p>
	I4B/First Wave Housing directors to strengthen their oversight of policies and procedures to prevent a recurrence of the issues identified in the internal audit	Minesh Patel - Corporate Director, Finance & Resources Alice Lester – Corporate Director, Neighbourhoods & Regeneration	<p>Response received on 07/10/24:</p> <p>Company directors will be asked to review and approve all policies and procedures being carried out by or on behalf of the companies at Board meetings going forward, and this will be documented via standard governance procedures including Board minutes.</p>

Information requests from RPRSC to Council departments/partners

Meeting date and	Information requests	Council Department/External Partner	Responses / Status
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agenda item			
6 Sept 2023– Planning Enforcement	Provide a breakdown of: 1. Planning breach complaints by ward and; 2. Types of breaches that have received enforcement notices by ward	Gerry Ansell – Director, Inclusive Regeneration & Employment, Neighbourhoods & Regeneration	<p>Response received on 24/10/23:</p> <p>Need to await for new software to be installed. This is scheduled for April 2024.</p> <p>Updated response received on 11/04/24:</p> <p>There has been a delay on the implementation of the new software. Testing is now not going to take place until June 2024 and go live is unlikely to take place until Autum 2024. Therefore we will not be in a position to produce this information until February 2025.</p>
24 Jan 2024 – Safer Brent Partnership Annual report 2022/23	The timeframe for implementing the response at Wembley Stadium and Wembley Arena to support the victims of sexual violence.	Kibibi Octave – Director, Communities & Partnerships, Partnerships, Housing, & Residents Services	<p>Response received on 15/02/24:</p> <p>A meeting was held with the Football Association (FA), the Police and the Community Safety Team in November 23 to discuss better supporting victims of sexual violence. One of the key initiatives was to train Wembley Stadium stewards to better understand the behaviours associated with sexual violence.</p> <p>The department is awaiting a follow up meeting from the FA to develop the initiatives and timeline for completion (likely to be June 2024).</p> <p>Updated response received on 08/07/24:</p> <p>The project completion date has been revised due to staffing changes within the FA. Brent Council and the Police have requested a meeting with FA, to be held in July 2024 to agree a timeline for all Wembley Stadium Stewards, to be trained by October 2024.</p> <p>Updated response received on 18/10/24:</p> <p>Our Interim Violence Against Women and Girls (VAWG) Lead has met with Abbey Smith from the FA regarding their VAWG campaign. Abbey has informed us that the stewards in her team have now received VAWG training that will assist them in supporting victims and equip them in being able to tackle VAWG incidents that occur at the stadium. The FA are now part of a wider VAWG campaign steering group that has been established in Wembley Park. The steering group has members from Quintain, Wembley Arena, the local police</p>

			team, hotels in Wembley Park and the Community Safety team. We are currently in the pre planning phase of the campaign and decisions are being made on which partner will lead the initiative.
17 July 2024 – Budget update: Medium Term Financial Strategy	Provide information on the number of agency staff (social workers) in Adult Social Care who have transitioned to permanent employment contracts over the past two years.	Rachel Crossley – Corporate Director, Community Health & Wellbeing	Response received on 11/10/24: In November 2023, the General Purposes Committee approved the introduction of recruitment and retention payments for social workers, occupational therapists and visual impairment rehabilitation officers in Adult Social Care (ASC), bringing the service in line with the scheme adopted by Children and Young People. To ensure the effectiveness of these measures could be measured, formal recording of agency conversions in ASC was then introduced. Between January and September 2024, 15 agency workers have converted to permanent members of staff – covering a number of roles including one Head of Service, Team Manager, Advanced Practitioners, Occupational Therapists, Social Workers and Community Support Workers. This has contributed to a reduction overall in agency workers within the Community Health and Wellbeing Directorate when comparing September 2024 (86) to September 2023 (104). Managers continue to speak to agency workers regularly to encourage further conversions.
4 Sept 2024 – Review of Year 1 of the Grounds Maintenance Contract with Continental Landscapes	Provide a high-level overview of the differences between the current and previous contract specifications, focusing on significant changes, new features, enhancements, and any potential shortcomings.	Chris Whyte – Director, Public Realm, Neighbourhoods & Regeneration	Response received on 29/10/24: The contract specification was re-written for the new contract. Whilst general maintenance requirements were maintained; the main changes were as follows: <ul style="list-style-type: none"> • All bank holidays were considered to be normal days reducing the cost that was previously incurred for bin emptying in parks on bank holidays. • An IT system was expected from the Contractor, which would allow staff and Housing Residents to be able to clearly see schedules of works and log issues. • The specification for managing ponds and watercourses was tightened up ensuring litter picking and maintenance of weeds at the edges was included • The requirement to enter Green Flag submissions was added as well as a requirement to increase the number of London in Bloom Submissions year on year

			<ul style="list-style-type: none"> • The entire contract; including Housing sites I snow mapped on GIS, for both the council and the contractor • There is a clear process for contract variations and ad-hoc works • There is a clear contract monitoring and reporting process in place, ensuring monthly meetings and Operational Meetings as and when required <p>There is a requirement for exception reports to be provided by the contractor to the council for any issues experienced that severely impact service delivery; such as adverse weather conditions or loss of IT system.</p>
	Provide annual report of the Grounds Maintenance contract's first year performance, highlighting key performance metrics, successes, challenges, and priorities for year 2.	Chris Whyte – Director, Public Realm, Neighbourhoods & Regeneration	<p>Response received on 29/10/24:</p> <p>This has been produced and has been presented at Lead Members Briefing on the 30th September. The priorities for year two of the contract have been agreed as follows:</p> <ul style="list-style-type: none"> • A focus on working together to create a clear dashboard for the reporting of the contract key performance indicators (KPI's). • Working with the client to provide a published verge cutting schedule for 2025 • Reviewing bin emptying schedules in areas where there are high numbers of reports of overflow • Working to keep housing estates well maintained and engaging residents • Ensuring that all areas that have been picked up during the first year as not being on contract are added to schedules and regularly maintained • Strengthen the relationships with Friends of Groups • Working on a plan to gain our first Green Flag and develop opportunities for further submissions in additional contract years <p>A copy of the annual report was circulated to the committee by email.</p>
	Provide biodiversity key performance indicators.	Chris Whyte – Director, Public Realm, Neighbourhoods & Regeneration	<p>Response received on 29/10/24:</p> <p>The existing KPI's include the following overarching provision: "Implement Biodiversity Commitments in accordance with Specification and Contractor</p>

			Method Statements". The contract specification requires a reduction in pesticide use, recycle all green waste, as well as ensure the selection of plants that are good for pollinators when devising planting schemes and working with the Parks Service to consider improvements to biodiversity, for example on Housing Land throughout the contract.
	Provide strategic plan and roadmap to restore Brent parks to green flag standards.	Chris Whyte – Director, Public Realm, Neighbourhoods & Regeneration	Response received on 29/10/24: A meeting has been held this week and two locations (Bramshill Open Space and King Edward VII, Wembley) have been confirmed as our selected parks to submit for a Green Flag Award in 2025. Submissions need to be made by the end of January 2025. An additional park will be added to the submission every year following.
	Provide action plan for the ongoing maintenance and improvement of sports pitches throughout the borough.	Chris Whyte – Director, Public Realm, Neighbourhoods & Regeneration	Response received on 29/10/24: The pitches in general are being maintained well, but the issue is the sunken drainage lines across a few locations. A conversation has been had with Continental about the mix of material being used and costs are being provided for any remedial works that are necessary for seasonal repairs. In addition, Continental are trialling a new process whereby they rake out larger areas around drainage lines to get new soil to blend in more and not just sink in the drainage lines.
4 Sept 2024 – Delivery of Affordable Housing by i4B Holdings Ltd and First Wave Housing Ltd	Provide details of any Section 106 properties acquired through i4B Holdings Ltd.	Alice Lester – Corporate Director, Neighbourhoods & Regeneration	Response received on 07/10/24: i4B's key worker housing block, the Lexington Building, was purchased as a Section 106 opportunity. In compliance with the s106, the 153 flats at this block in Wembley Park are let exclusively to public sector key workers at a rent + service level of below 65% of market levels. This is to date the only Section 106 opportunity that has been pursued through i4B.
	Provide details of any potential Section 106 acquisitions that were not pursued due to viability issues, including the specific reasons for each case.	Alice Lester – Corporate Director, Neighbourhoods & Regeneration	Response received on 07/10/24: N/A - there have been no other Section 106 acquisition opportunities considered in detail by i4B (or FWH) and therefore none rejected due to viability issues. In general, it is challenging to make such opportunities work through the companies due to the required rent levels (such as social rent and London Living Rent) not matching up to price expectations from developers.

	Provide asset management strategy upon completion.	Alice Lester – Corporate Director, Neighbourhoods & Regeneration	Response received on 07/10/24: This will be presented to the i4B/FWH Board meeting on Thursday 28 th November and, dependent on any feedback from directors and further work required, will be available to share with the committee in December 2024.
	Provide a breakdown of the expected costs associated with enhancing energy performance and retrofitting the i4B/First Wave Housing stock.	Alice Lester – Corporate Director, Neighbourhoods & Regeneration	Response received on 07/10/24: This information will be included in the asset management strategy, which will be presented to the i4B/FWH Board meeting on Thursday 28 th November and, dependent on any feedback from directors and further work required, will be available to share with the committee in December 2024.

 Brent	Resources and Public Realm Scrutiny Committee 5 November 2024
	Report from the Deputy Director, Democratic Services
Resources and Public Realm Scrutiny Committee Work Programme 2024/25.	

Wards Affected:	All
Key or Non-Key Decision:	Not Applicable
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: Committee Work Programme 2024/25
Background Papers:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Jason Sigba, Strategy Lead – Scrutiny, Law & Governance 020 8937 2036 Jason.Sigba@brent.gov.uk Amira Nassr, Deputy Director, Democratic Services, Law & Governance 020 8937 5436 Amira.Nassr@brent.gov.uk

1.0 Executive Summary

1.1 To provide an update on the changes to the Resources and Public Realm Scrutiny Committee’s work programme.

2.0 Recommendation(s)

2.1 That committee members note the report and the changes to the work programme within.

3.0 Detail

3.1 Contribution to Borough Plan Priorities & Strategic Context

3.1.1 Borough Plan 2023-2027 – all strategic priorities.

3.2 Background

3.2.1 The work programme outlines the items which the Resources and Public Realm Scrutiny Committee will consider during the municipal year.

3.2.2 It is intended to be a flexible, living document that can adapt and change according to the needs of a committee. The amendments set out in this report are reflective of this (all changes in Appendix A highlighted in red).

3.2.3 The following items have been added to the agenda for the 5 November 2024 meeting:

- Findings of the Local Government Ombudsman regarding a failure to attach a condition to a 2012 planning consent (new addition to agenda)
- CIL and 106 (item brought forward from the 23 April 2025 meeting)

3.2.4 Other key changes to the work programme include:

- The People Strategy (formerly known as the Workforce Strategy) item being moved from the 5 November 2024 meeting to 28 January 2025 meeting
- The Employment & Skills item being moved from the 5 November 2024 meeting to the 25 February 2025 meeting
- The Complaints Annual Report 2023/24 being moved from the 28 January 2025 meeting to 23 April 2025 meeting

4.0 Stakeholder and ward member consultation and engagement

4.1 Ward members are regularly informed about the Committee's work programme in the Chair's report to Full Council. There is ongoing consultation with other relevant stakeholders.

5.0 Financial Considerations

5.1 There are no financial considerations arising from this report. However, budget and financial implications are addressed in the 'Financial Considerations' section of any reports to the Committee, requested as part of its work programme.

6.0 Legal Considerations

6.1 There are no legal considerations arising from this report. However, legal implications are addressed in the 'Legal Considerations' section of any reports to the Committee, requested as part of its work programme.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

7.1 There are no EDI considerations for the purposes of this report. However, EDI implications are addressed in the 'EDI Considerations' section of any reports to the Committee, requested as part of its work programme.

8.0 Climate Change and Environmental Considerations

8.1 There are no climate change and environmental considerations for the purposes of this report. However, climate change and environmental implications are addressed in the 'Climate Change and Environmental Considerations' section of any reports to the Committee, requested as part of its work programme.

9.0 Communication Considerations

9.1 There are no communication considerations for the purposes of this report. However, communication implications are addressed in the 'Communication Considerations' section of any reports to the Committee, requested as part of its work programme.

Report sign off:

Amira Nassr

Deputy Director, Democratic Services

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Appendix A

Resources and Public Realm Scrutiny Committee Work Programme 2024/25

17 July 2024

Agenda Item	Cabinet Member/Non-Executive Member	Chief Executive/Corporate Director	External Organisations
Budget 2024/25 Update: Medium Term Financial Strategy	Cllr Muhammed Butt, Leader of the Council Cllr Mili Patel, Deputy Leader and Cabinet Member for Finance and Resources	Minesh Patel, Corporate Director – Finance and Resources	

4 September 2024

Agenda Item	Cabinet Member/Non-Executive Member	Chief Executive/Corporate Director	External Organisations
Committee Work Programme 2024/25	Cllr Rita Conneely, Chair of Resources and Public Realm Committee	Debra Norman, Corporate Director – Law and Governance	
Establishment of Budget Scrutiny Task Group	Cllr Rita Conneely, Chair of Resources and Public Realm Committee	Debra Norman, Corporate Director – Law and Governance	
Grounds Maintenance Contract – Year One Performance	Cllr Krupa Sheth, Cabinet Member for Environment and Enforcement	Alice Lester, Corporate Director – Neighbourhoods and Regeneration	Continental Landscapes
I4B & First Wave Housing	Cllr Shama Tatler, Cabinet Member for Regeneration, Planning and Growth	Alice Lester, Corporate Director – Neighbourhoods and Regeneration	I4B/First Wave Housing

5 November 2024

Agenda Item	Cabinet Member/Non-Executive Member	Chief Executive/Corporate Director	External Organisations
Findings of the Local Government Ombudsman regarding a failure to attach a condition to a 2012 planning consent	Cllr Shama Tatler, Cabinet Member for Regeneration, Planning and Growth	Alice Lester, Corporate Director – Neighbourhoods and Regeneration	
CIL and 106	Cllr Shama Tatler, Cabinet Member for Regeneration, Planning and Growth	Alice Lester, Corporate Director – Neighbourhoods and Regeneration	
Budget 2024/25: In-Year Monitoring Update	Cllr Mili Patel, Deputy Leader and Cabinet Member for Finance and Resources	Minesh Patel, Corporate Director – Finance and Resources	

28 January 2025

Agenda Item	Cabinet Member/Non-Executive Member	Chief Executive/Corporate Director	External Organisations
Budget Scrutiny Task Group Findings	Cllr Rita Conneely, Chair of Resources and Public Realm Committee	Debra Norman, Corporate Director – Law and Governance	
Safer Brent Partnership Report 2023/24	Cllr Harbi Farah, Cabinet Member for Public Safety and Partnerships	Peter Gadsdon, Corporate Director – Partnerships, Housing, and Resident Services	Metropolitan Police
People Strategy (formerly known as Workforce Strategy)	Cllr Mili Patel, Deputy Leader and Cabinet Member for Finance and Resources	Debra Norman, Corporate Director – Law and Governance	

25 February 2025

Agenda Item	Cabinet Member/Non-Executive Member	Chief Executive/Corporate Director	External Organisations
Budget 2024/25: In-Year Monitoring Update	Cllr Mili Patel, Deputy Leader and Cabinet Member for Finance and Resources	Minesh Patel, Corporate Director – Finance and Resources	
Employment & Skills	Cllr Jake Rubin, Cabinet Member for Employment, Innovation and Climate Action	Alice Lester, Corporate Director – Neighbourhoods and Regeneration Peter Gadsdon, Corporate Director – Partnerships, Housing, and Resident Services	
Community Wealth Building and Social Value	Cllr Jake Rubin, Cabinet Member for Employment, Innovation and Climate Action	Rachel Crossley, Corporate Director – Community Health and Wellbeing	

23 April 2025

Agenda Item	Cabinet Member/Non-Executive Member	Chief Executive/Corporate Director	External Organisations
Complaints Annual Report 2023/24	Cllr Mili Patel, Deputy Leader and Cabinet Member for Finance and Resources	Debra Norman, Corporate Director – Law and Governance	
Build Quality	Cllr Shama Tatler, Cabinet Member for Regeneration, Planning and Growth	Alice Lester, Corporate Director – Neighbourhoods and Regeneration	

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