Resources and Public Realm Scrutiny Committee

Tuesday 2 September 2025 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 Substitute Members

Councillors: Councillors:

Conneely (Chair) Aden, Afzal, Ethapemi, Collymore, Mahmood, Rajan-

Kennelly (Vice-Chair) Seelan, Ketan Sheth and T Smith

Ahmadi Moghaddam

S Butt Councillors:

Dixon Kansagra and J Patel

Long

Lorber Councillors:
Maurice Clinton and Matin

Mitchell Molloy Shah

For further information contact: Rebecca Reid, Governance Officer

Tel: 020 8937 2469 Email: rebecca.reid@brent.gov.uk

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Notes for Members - Declarations of Interest:

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

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

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

*Disclosable Pecuniary Interests:

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

**Personal Interests:

The business relates to or affects:

- (a) Anybody of which you are a member or in a position of general control or management, and:
 - To which you are appointed by the council;
 - which exercises functions of a public nature;
 - which is directed is to charitable purposes;
 - whose principal purposes include the influence of public opinion or policy (including a political party of trade union).
- (b) The interests 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 **Deputations (if any)** To hear any deputations received from members of the public in accordance with Standing Order 67. 4 Resources & Public Realm Scrutiny Committee Work Programme 1-8 2025/26 To provide an update on the changes to the Resources and Public Realm Scrutiny Committee's work programme. 5 **Establishment of Budget Scrutiny Task Group** 9 - 12The purpose of this report is for the Resources and Public Realm Scrutiny Committee to establish a task group to consider the Cabinet's budget proposals for 2026/27. **Brent Local Plan Review** 13 - 30 6 This paper addresses points that the Scrutiny Committee has indicated that it wishes to focus on in respect of the Brent Local Plan review. These are an overview of the Local Plan's performance to date, along with the key priorities, proposed scope, approach, and governance arrangements for the upcoming review. **Scrutiny Progress Update - Recommendations Tracker** 31 - 70 7

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

(Agenda republished to include this item on 29 August 2025)

8 Any other urgent business

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

Date of the next meeting: Tuesday 4 November 2025



Please remember to set your mobile phone to silent during the meeting.

 The meeting room is accessible by lift and seats will be provided for members of the public. Alternatively, it will be possible to follow proceedings via the live webcast HERE



Resources and Public Realm Scrutiny Committee

2 September 2025

Report from the Deputy Director, Democratic and Corporate Governance

Resources and Public Realm Scrutiny Committee Work Programme 2025/26

Wards Affected:	All
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:	Appendix A – Resources and Public Realm Scrutiny Committee Work Programme 2025/26
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Jason Sigba, Strategy Lead – Scrutiny, Democratic & Corporate Governance Jason.Sigba@brent.gov.uk Amira Nassr, Deputy Director, Democratic & Corporate Governance, Finance & Resources 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 following amendment set out in this report is reflective of this:
 - The agenda item titled 'Kerbside Management Scrutiny Task Group Findings' has been rescheduled from the 2 September 2025 meeting to the 4 November 2025 meeting (please see change in Appendix A highlighted in red).

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 and Corporate Governance



Resources and Public Realm Scrutiny Committee Work Programme 2025/26

16 July 2025

Agenda Item	Cabinet Member/Non-Executive Member	Corporate Director	External Organisations
Committee Work Programme 2025/26	Cllr Rita Conneely, Chair of Resources and Public Realm Committee	Minesh Patel, Corporate Director – Finance and Resources	
Recycling in Brent	Cllr Krupa Sheth, Cabinet Member for Public Realm and Enforcement	Alice Lester, Corporate Director – Neighbourhoods and Regeneration	
Budget 2025/26 Update: Medium Term Financial Outlook	Cllr Mili Patel, Deputy Leader and Cabinet Member for Finance and Resources	Minesh Patel, Corporate Director – Finance and Resources	

2 September 2025

Agenda Item	Cabinet Member/Non-Executive Member	Corporate Director	External Organisations
Establishment of Budget Scrutiny Task Group	Cllr Rita Conneely, Chair of Resources and Public Realm Committee	Minesh Patel, Corporate Director – Finance and Resources	
Local Plan Review	Cllr Teo Benea, Cabinet Member for Regeneration, Planning and Property	Alice Lester, Corporate Director – Neighbourhoods and Regeneration	

4 November 2025

Agenda Item	Cabinet Member/Non-Executive Member	Corporate Director	External Organisations
Budget 2025/26: In-Year Monitoring Update	Cllr Mili Patel, Deputy Leader and Cabinet Member for Finance and Resources	Minesh Patel, Corporate Director – Finance and Resources	
Social Value Policy	Cllr Jake Rubin, Cabinet Member for Climate Action and Community Power	Rachel Crossley, Corporate Director – Service Reform and Strategy	
Procurement Strategy	Cllr Jake Rubin, Cabinet Member for Climate Action and Community Power	Rachel Crossley, Corporate Director – Service Reform and Strategy	
Funding and Support for the Voluntary and Community Sector (VCS)	Cllr Jake Rubin, Cabinet Member for Climate Action and Community Power	Rachel Crossley, Corporate Director – Service Reform and Strategy	
Kerbside Management Scrutiny Task Group Findings	Cllr Mary Mitchell, Member of Resources and Public Realm Committee and Task Group Chair	Minesh Patel, Corporate Director – Finance and Resources	

21 January 2026

Agenda Item	Cabinet Member/Non-Executive Member	Corporate Director	External Organisations
Budget Scrutiny Task Group Findings	Cllr Rita Conneely, Chair of Resources and Public Realm Committee	Minesh Patel, Corporate Director – Finance and Resources	
Safer Brent Partnership Report 2025/26	Cllr Harbi Farah, Cabinet Member for Safer Communities, Jobs and Skills	Nigel Chapman, Corporate Director – Children, Young People and Community Development	Metropolitan Police

Community Engagement and Consultation Consu	
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24 February 2026

Agenda Item	Cabinet Member/Non-Executive Member	Corporate Director	External Organisations
Budget 2025/26: In-Year Monitoring Update	Cllr Mili Patel, Deputy Leader and Cabinet Member for Finance and Resources	Minesh Patel, Corporate Director – Finance and Resources	
Complaints Annual Report 2024/25	Cllr Mili Patel, Deputy Leader and Cabinet Member for Finance and Resources	Minesh Patel, Corporate Director – Finance and Resources	
Littering and Fly Tipping	Cllr Krupa Sheth, Cabinet Member for Public Realm and Enforcement	Alice Lester, Corporate Director – Neighbourhoods and Regeneration	

2 April 2026

Agenda Item	Cabinet Member/Non-Executive Member	Corporate Director	External Organisations
Allotments Management	Cllr Krupa Sheth, Cabinet Member for Public Realm and Enforcement	Alice Lester, Corporate Director – Neighbourhoods and Regeneration	
Approach to tackling ASB across Brent	Cllr Harbi Farah, Cabinet Member for Safer Communities, Jobs and Skills	Nigel Chapman, Corporate Director – Children, Young People and Community Development	

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Resources and Public Realm Scrutiny Committee

2 September 2025

Report from the Deputy Director, Democratic and Corporate Governance

Establishment of Budget Scrutiny Task Group

Wards Affected:	All
Key or Non-Key Decision:	Non-Key Decision
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:	None
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Jason Sigba, Strategy Lead – Scrutiny, Democratic & Corporate Governance Jason.Sigba@brent.gov.uk Amira Nassr, Deputy Director, Democratic & Corporate Governance, Finance & Resources Amira.Nassr@brent.gov.uk

1.0 Executive Summary

1.1 The purpose of this report is for the Resources and Public Realm Scrutiny Committee to establish a task group to consider the Cabinet's budget proposals for 2026/27.

2.0 Recommendation(s)

- 2.1 That a Budget Scrutiny Task Group be established with members to be confirmed at the Committee meeting on 2 September 2025.
- 2.2 The terms of reference for the group will be to:
 - 1. Consider the Cabinet's budget proposals for 2026/27
 - 2. Receive evidence from cabinet members, senior departmental officers, and any other relevant stakeholders
 - 3. Agree a draft report to comment on the budget proposals for submission to the Resources and Public Realm Scrutiny Committee for ratification and submission to Cabinet

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 process for developing proposals for the budget and capital programme each year is outlined in the Brent Council Constitution, Part 2, Paragraph 19. This requires the Resources and Public Realm Scrutiny Committee to meet (on more than one occasion if necessary) to consider the report to Cabinet from the Corporate Director of Finance and Resources setting out the financial position of the Council, financial forecasts for the following year, and the possible expenditure priorities of the Executive, as well as a report on the draft budget proposals.
- 3.2.2 The Committee may receive evidence from Cabinet Members, Council officers, and other relevant stakeholders.
- 3.2.3 The Committee should agree a report setting out its view of the budget priorities and any other issues it considers relevant. This report should then be submitted to each Cabinet Member and each Group Leader in order to inform budget proposal discussions. The Committee should submit a note/report on its deliberations and comments on the proposals to the Cabinet.
- 3.2.4 At its meeting on 16 July 2025, the Resources and Public Realm Scrutiny Committee received a report from the Corporate Director of Finance and Resources outlining the Council's overall financial position. This included the Medium Term Financial Outlook, which highlighted the significant risks, issues, and uncertainties facing the authority. The report also set out the proposed budget setting strategy for 2026/27, which is the Council's minimum legal duty in respect of local authority budget setting, in order to maximise the period of consultation with residents, businesses and other key stakeholders.
- 3.2.5 A report to Cabinet from the Corporate Director of Finance and Resources on the Draft Budget, outlining proposals for 2026/27, is scheduled for publication in autumn 2025. This will be reviewed by the Task Group.
- 3.2.6 Comments and any draft recommendations from the task group are expected to be considered and agreed by the Resources and Public Realm Scrutiny Committee on Wednesday 21 January 2026. A report from the Committee will then be presented to Cabinet for consideration on Monday 9 February 2026, alongside the report from the Corporate Director of Finance and Resources on final budget proposals.
- 3.2.7 Cabinet will recommend a budget for approval at Full Council on Monday 23 February 2026.

4.0 Stakeholder and ward member consultation and engagement

4.1 The Budget Scrutiny Task Group may consider any consultation being undertaken as part of the Council's budget setting process.

5.0 Financial Considerations

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

6.0 Legal Considerations

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

7.0 Equity, Diversity & Inclusion (EDI) Considerations

7.1 There are no Equity, Diversity & Inclusion considerations for the purposes of this report.

8.0 Climate Change and Environmental Considerations

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

9.0 Communication Considerations

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

Report sign off:

Amira Nassr

Deputy Director, Democratic and Corporate Governance





Resources and Public Realm Scrutiny Committee

2 September 2025

Report from the Corporate Director, Neighbourhoods and Regeneration

Brent Local Plan Review

Wards Affected:	All except parts of Alperton, Harlesden and Kensal Green, Stonebridge and Tokyngton, where the Old Oak and Park Royal Development Corporation (OPDC) is the Local Planning Authority.
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:	None
Background Papers:	None
Contact Officer(s):	Paul Lewin Spatial & Transportation Planning Manager, Inclusive Regeneration & Climate Resilience paul.lewin@brent.gov.uk

1.0 Executive Summary

1.1. This paper addresses points that the Scrutiny Committee has indicated that it wishes to focus on in respect of the Brent Local Plan review. These are an overview of the Local Plan's performance to date, along with the key priorities, proposed scope, approach, and governance arrangements for the upcoming review.

2.0 Recommendation(s)

2.1 To note the contents of the report as a basis for discussion.

3.0 Detail

3.1 Contribution to Borough Plan Priorities & Strategic Context

3.1.1. The development plan and associated planning documents provide a positive framework for managing development to meet the borough plan priorities as follows:

- 1. Prosperity and Stability in Brent The Plan seeks to address housing needs of the population for housing and necessary social and cultural infrastructure. By supporting extensive regeneration of parts of Brent, especially in its growth areas, its town centres and commercial areas and supporting business it provides increased opportunities for wealth generation and prosperity of Brent residents through providing access to local jobs. This will sustain its desirability and prosperity, whilst providing clear guidelines for development helps ensure stability in an area.
- 2. Thriving Communities Addressing the wide range of needs of residents and businesses will better equip Brent communities in meeting the challenges and opportunities ahead. A strengthened sense of place provided through a clear vision for the development of Brent helps to improve development outcomes and create a sense of belonging which contributes towards community cohesion.
- 3. A Healthier Brent Providing more and better homes, jobs, social infrastructure and improving the quality and amount of green infrastructure in Brent, encouraging walking and cycling, whilst reducing unnecessary vehicle movements will improve mental and physical well-being.
- 4. A Cleaner, Greener Future New developments will deliver higher environmental standards, better addressing the threat posed by climate change and working towards the Council's goal to be carbon neutral by 2030.
- 5. The Best Start in Life A principal determinant of future life chances for younger people is having a stable accommodation, including a home that is affordable, has sufficient space to live and growth in and internally provides a healthy environment. Brent's current development plan supports the delivery of as many homes as are realistically considered to be feasible in the period to 2041, a significant number of will be higher quality affordable homes, with higher levels of outdoor amenity space than standards set in the London Plan.

3.2 Background

- 3.2.1 The Council is required to have a Development Plan (also known as a Local Plan) in place that is up to date and regularly reviewed (at least every 5 years). It published a revised <u>Local Development Scheme in April 2025</u>. This set out an indicative timescale for the West London Waste Plan and Brent Local Plan reviews. The West London Waste Plan is being taken forward with partner Local Planning Authorities (Ealing, Harrow, Old Oak Development Corporation, Hillingdon, Hounslow and Richmond) with project management support from the West London Alliance. The intention is to submit the Waste Plan for examination prior to the Government's December 31st 2026 deadline for plans to use the existing development plans adoption process.
- 3.2.2 The review of the Brent Local Plan will be subject to the new development plans process as initially set out in the Levelling Up and Regeneration Act 2023. This

will be subject to yet unreleased associated regulations and national practice guidance which will provide a more definitive process for taking plans through to adoption. Cabinet will consider a paper on the funding of the Local Plan review on 8th September 2025.

3.2.3 Performance of the existing Local Plan

Overview of performance against key targets, highlighting successes and areas of underperformance.

- 3.2.4 The performance of the Local Plan is reviewed and reported annually in the Authority Monitoring Report (AMR). Previous reports can be found on this link: Authority monitoring reports | Brent Council This is usually produced towards the end of the calendar year, reviewing the previous financial year. Some policies of the Local Plan might take some time to become apparent in their implementation due to development lag, i.e. it can for larger sites take about 5 years before policy outcomes can be seen in development that is completed/occupied. Feedback of the initial implementation however in terms of what might not work so well in terms of deviation from aims can become apparent through discussion with colleagues when considering planning applications and seeing how applicants and councillors respond to policies.
- 3.2.5 Housing is the most significant priority in national policy, the London Plan, Brent Local Plan and the Brent Borough Plan. The London Plan 2021 target significantly increased from a previous 1525 dwellings per annum in the old London Plan to 2325 dwellings per year for the 10-year period to 2028/29 (ie 23,250 new homes in the borough over the entire 10 year period). These targets are minimums, not a cap. The target is measured by the number of completions per year, not the number of homes granted planning permission, nor begun on site.
- 3.2.6 Brent's delivery prior to 23/24 was excellent. In the 3 financial years to 22/23 Brent delivered the equivalent of 8136 net additional dwellings (MHCLG official figures). This represented 131% of its target against the Housing Delivery Test (HDT). Delivery in 23/24 was however very weak at 656 net dwellings. This is not yet reflected in the latest MHCLG HDT figures but represents only 28% of the 2,325 annual minimum target. Completions for 24/25 have not been finalised but are likely to be well below the target. Lack of planning permissions are not what is holding back delivery. The latest GLA datahub information indicates that as of 31st March 2024, 16,985 dwellings had permission but had not been completed. It is other factors including viability, construction capacity, the contraction of the private sales market, investor caution and building safety regulator sign-off (for buildings 6 or more storeys) that are having the biggest slowdown impact.
- 3.2.7 In respect of other Local Plan housing objectives, the amount/ percentage of affordable housing, when compared to overall housing delivery, is below the 35% London Plan fast track route target and significantly below the 50% strategic Local Plan target. In 23/24 19.7% of the homes that were completed in the borough were affordable, and 26.7% of the homes that were approved

- that year were affordable. For 23/24 homes delivered which were subject to an affordable housing S106 obligation, the percentage delivered was 44%.
- 3.2.8 The Local Plan has a target of 1 in every new 4 homes requiring permission being 3 or more bedrooms. In 23/24 delivery was below this at 12.2%. Delivery of this target is impacted by small scale schemes that might be for three of less dwellings, thus not required to provide a three-bed home; on larger schemes, there is often a trade-off reflecting the viability considerations. 3+ bedroom schemes do not attain the same values (per square metre) as properties with 1 or 2 bedrooms, thus requiring the 25% affects development viability and can reduce the number of affordable homes that can be delivered.
- 3.2.9 Significant successes have been the adoption of masterplan supplementary planning documents for the growth areas of Church End, Neasden Stations and Staples Corner, whilst a masterplan will be approved as part of the planning permission for Northwick Park growth area. These will support development of those areas once delivery picks up. Interest in the areas has increased significantly compared to when they were first allocated, and the SPD adoption process has increased the areas' exposure and awareness of the development sector in them and through clear guidance improves investor confidence.

3.2.10 In-depth analysis of the following areas:

a) Delivery of high-quality, sustainable, and affordable housing

- 3.2.11 The quality of new homes being delivered, particularly in major developments is high. London has the highest quality standards in the country delivered through policies and supporting guidance. Major developments are subject to the greatest level of professional advice for the developers (e.g. architects/ urban designers/ landscape engineers/ ecologists/ structural and mechanical engineers, etc) with a wider range of policies particularly related to attainment of sustainability standards required, e.g. energy efficiency, incorporation of renewables, carbon neutrality, air quality positive, etc. These schemes are also increasingly reviewed by the Brent Quality Review Panel and the Community Review Panel who provide an expert/ specialism-based critique of schemes at early stages of their development, which supports improvement. Many large schemes are also subject to a two stage GLA review, who, like the Council, have a wide range of development related professionals scrutinising the developments.
- 3.2.12 For minor developments, the range of policies that apply are fewer, in part reflective of the Government's position that to support the small builders' sector there should be lower costs/ simpler processes. In addition, many of the homes in this sector in Brent are delivered via conversions of existing homes (e.g. conversions of houses to flats). These factors can bring compromises that might not be applicable in larger schemes, e.g. no lifts, inability to provide outdoor amenity space for upper floor dwellings, encouragement to attain higher energy efficiency/ renewables, rather than requirement, etc.

3.2.13 The Council ensures that the quality of the affordable homes is consistent with that delivered for private homes. Applicants know that the Council will not accept obvious lower standards or development that is not tenure blind particularly in terms of outward appearance and location. There however, may be subtle differences, (e.g. communal facilities such as size of lobbies, corridor finishes, incorporation of soft furnishings, gym facilities) as registered providers seek to reduce on-going service charges to occupants.

Infrastructure-led development that integrates housing into complete, sustainable neighbourhoods with access to:

- Social infrastructure (e.g. sports and community facilities)
- Green spaces
- Local services and shops
- Active travel infrastructure
- 3.2.14 Brent's Local Plan policies focus most of the new homes delivery in the eight Growth Areas it identifies. Some of these have a relatively long history of delivery, e.g. Wembley, South Kilburn, Alperton, others are just emerging, e.g. Neasden stations, Northwick Park or Staples Corner. Each Growth Area is supported by Local Plan policies which identify the amount of development that is expected to come forward and the infrastructure that is required to support that development.
- 3.2.15 Most of the Growth Areas have been subject to masterplanning. This has either been undertaken by the Council taking forward an Action Plan (Wembley) or Supplementary Planning Document (such as Alperton, Church End, Neasden, South Kilburn and Staples Corner). In some cases, applicants have submitted a large outline application with an associated masterplan that has been subject to the Council's approval, (e.g. Northwick Park). Work is progressing on the Capitol Valley masterplan, part of the Burnt Oak/ Colindale Growth Area. These masterplans build on the information provided within the Local Plan policies, identifying the infrastructure needs and the location for that infrastructure.
- 3.2.16 Where required, the masterplans have referred to the need for additional onsite social infrastructure, e.g. public open spaces, health centres and schools. Wembley is the largest growth area and the most advanced in terms of delivery. Infrastructure provision associated with development is generally dependent on developer contributions. As it is a cost to developers, it usually has been delivered as the developments have progressed and gained some financial returns to developers. Most is incorporated within planning applications for the developments and their delivery.
- 3.2.17 For example, for Wembley Growth area, a large-scale public open space in the form of a new park which is north and south of Engineers Way and smaller scale public open spaces such as Elvin Gardens have been provided over time as part of developments. To date, the Wembley Park development incorporates new GP premises, a community centre (Big Yellow), two nurseries and affordable workspace, as well as all dwellings having access to a high-quality on-site amenity space (plus in the case of housing developments, communal internal facilities, gyms, etc). Ground floor commercial uses in residential blocks

address local resident and wider locality needs, complementing the town centre offer. Affordable housing has been delivered, with the amount/ tenure varying considering permissions granted, plus changes in market circumstances/ viability. A site has been allocated within the Local Plan for an additional primary school with nursery on the York House car park, should it be required in the future.

- 3.2.18 In the nearby Wembley Housing Zone development (Council led), there will be new public open spaces, enhanced public realm and a community centre.
- 3.2.19 Outside the infrastructure upgrades provided by development, Community Infrastructure Levy (CIL) payments which have been made by the developers have supported the provision of infrastructure such as the connection of North End Road to Bridge Road, the resurfacing/ landscaping of Olympic Way, replacement of the pedway with steps, plus anti-terror vehicle control measures, it has also part funded fit out of the GP surgery.
- 3.2.20 The public open spaces in this development are retained by the developer and paid for by the occupants of adjacent developments but required to be publicly accessible.
- 3.2.21 CIL has also been used or committed for the provision of infrastructure in several other areas. This includes a £5m contribution towards the provision of step free access for Alperton Station, a new pedestrian/cycle bridge over the canal in Alperton, the provision of new play facilities in some Alperton parks, funding towards the fit out of the new medical facilities in South Kilburn, the construction of a new primary school in South Kilburn, the upgrading and improvement of the South Kilburn Open Space, and road and connectivity improvements in Staples Corner.
- 3.2.22 Other funding sources where they become available are sometimes drawn upon. For Northwick Park, major improvements were required to the vehicular access arrangements before development could proceed. At £1m these were too costly for the development to deliver before start on site, so were funded by Government's Housing Investment Fund (£10 million), CIL (£3million) and funds from the developer partners.
- 3.2.23 Active travel infrastructure is being addressed in masterplan areas and larger developments through new street layouts and connectivity improvements, consistent with the TfL Healthy Streets for London Guide which promotes walking and, with traffic calming, an environment that is better for cyclists. Schemes incorporate cycle parking in line with London Plan minimums and design standards. Some improved connectivity measures to encourage more cycling will start to be taken forward through for example, the development of the Brent Active Travel Implementation Plan. Along with TfL funding for cycling/transportation schemes, these measures, due to the limited TfL funds available may well require additional funding sources.

b) Climate change mitigation and resilience, including flood risk management

- 3.2.24 Major developments are subject to policies which address climate change and resilience, minor developments do not have the same level of policy requirements for all these matters but are encouraged to address them.
- 3.2.25 Major residential developments are required to reduce energy needs through design (capturing solar gain/ reducing overheating through orientation and building features) and fabric (insulation/ air tightness), support use of renewables and be carbon zero (or make an off-set payment where this cannot be achieved on site). Where possible growth areas should support/ make use of district heating/ cooling/ hot water systems or be able to connect into them in future if they are not available. Major non-residential developments are expected to be BREEAM excellent. There is a district heating in Wembley Park, and one for South Kilburn is currently being procured; one is proposed for Northwick Park and will address the residential heating/ cooling and hot water through an integrated development wide system making use of air source heat pumps.
- 3.2.26 In terms of ecology, all major developments are subject to the statutory 10% biodiversity net gain (BNG) uplift. Green infrastructure provision on site is enhanced where existing biodiversity might be low and the 10% uplift provides limited benefits, through the application of the GLA's Urban Greening Factor (UGF) of 0.4 for residential development and 0.3 for most commercial features.
- 3.2.27 For flooding, consistent with national policy a sequential approach is taken to development in terms of flood risk from all sources, based on the acceptability of the use's risk in the relevant flood risk zone. The Council has undertaken Strategic Flood Risk Assessments consistent with the requirements of national policy and guidance and justified where it has not been possible to avoid sites being identified for development in the floodplain. For site allocations, growth areas and other designations such as intensification corridors it sets out measures required to address flooding risk.
- 3.2.28 Where development occurs in floodplain (typically identified as having a 1 in 100-year probability of flooding), it is expected to be safe for the lifetime of the development. This also must account for climate change (design allowing shelter or safe access or egress in times of flood, floor levels above predicted flood levels and not increase flood risk elsewhere). In cases where development may not be able to raise floor levels above flood levels, e.g. industrial buildings, it is designed to be resistant or resilient should water enter, e.g. through use of materials that can withstand water and ensuring services (such as electrical equipment/ power sources, are not compromised e.g. by placing them above predicted flood levels).
- 3.2.29 Surface water is expected to be reduced to greenfield run-off rates wherever possible. For example, in Wembley Park the hard surface areas discharge to underground attenuation tanks/ structures with a limited outflow to the surface water pipe system leading to the Wealdstone Brook. This has significantly reduced surface water run-off in times of heavy rain compared to levels that occurred in the period prior to the new stadium being built. All schemes which

impact on the surface water network are reviewed and agreed by the Council's Lead Local Flood Authority officer. National and local policy prioritises sustainable urban drainage (SUDS) techniques over harder engineered solutions such as tanks or pipes. Developers are encouraged to integrate SUDS where possible into amenity space or public realm, as it can also assist in delivering UGF or BNG. For some very constrained sites (very high density on small site footprint) however, there might be a greater reliance on tanks.

c) Jobs and skills development

- 3.2.30 The Local Plan policies address several matters to support the local economy, e.g. site allocations for employment use, protection of employment sites and small employment premises (Policies BE2 and BE3), inclusion of 10% affordable workspace in significant employment developments and an Employment, Apprenticeship and Training Plan for developments of over 5000sqm or 50 dwellings (Policy BE1). The Planning Obligations SPD sets out more of the expectations in respect of developments providing jobs and skills development.
- 3.2.31 The focus in the construction phase is on apprenticeship opportunities being provided for borough residents who may be from a disadvantaged background or having been unemployed. Post occupation of commercial premises job opportunities/ training can sometimes be subject to agreements involving Brent Works to source some of the workforce for commercial tenants. In 23/24 it is estimated that approximately 300 job opportunities were created via S106 obligations for Brent residents. Further detail on the range of support Brent Works provide because of planning obligations and other activities is set out in the AMR.

d) Gambling

- 3.2.32 Overall, over the last decade there has been a reduction in the number of licensed gambling premises across the borough. The biggest drop has been in betting shops/ bookmakers. Reductions in prize levels for fixed odds gambling machines, plus a large move of the sector in the last 5 years towards on-line gambling have resulted in the large betting shop chains reducing their physical presence in town centres and local parades.
- 3.2.33 There has however been increased interest from Adult Gaming Centres (AGCs) in providing more outlets. These often are focussed on disused betting shops (established gambling use which often have been vacant for some time) or banks (similarly vacant for some time).
- 3.2.34 Brent's Local Plan policy BE5 identifies a 4% frontage limit for betting shops and a 3% limit for adult gaming centres and pawn brokers, with an expectation of a minimum of four units allowed between the uses to prevent an over-concentration. This works well where the number of AGCs means that an additional AGC will break the 3% frontage length limit. Inspectors have supported the Council's refusals at appeals where this breach is used as a reason for refusal, e.g. Neasden. For some town centres however, the 3% limit

still provides some headroom for additional premises. All other reasons for refusal related to anti-social behaviour, harms to more deprived/ vulnerable residents, etc. currently hold little weight for Inspectors considering appeals. The AGC operators have empirical evidence gained from operating hundreds of units and dealing with many appeals that can refute what is often anecdotal evidence on harms that have been used as reasons for refusal. They set out company policy/ procedures/ training for staff that diminish the prospect of anti-social behaviour or identification of vulnerable/ addictive individuals/ behaviours and the time for intervention.

- 3.2.35 The Local Plan policy on gambling establishments will be reviewed. The policy needs to be clearer on the tests for over-concentration in respect of separation between any gambling use. Inspectors have interpreted the policy to require a gap between each of the named gambling uses, rather than between any type of gambling use. In addition, naming the end user typologies means new typology entrants to the market who do not fall within the identified categories are harder to control (e.g. recent move towards 'bingo halls'). The Council working with other Councils and local MPs is leading the lobbying of central government to change the licensing regime to allow the consideration of harmful impacts associated with a concentration of gambling premises. The Government has recently indicated to Brent MPs that it is considering strengthening councils' ability to influence the location and density of gambling outlets, through the introduction of Cumulative Impact Assessments (CIAs) in gambling licensing when parliamentary time allows.
- 3.2.36 If CIAs are introduced for licensing purposes, this should provide sufficient measures to control over concentration. If not, the Local Plan policy will need to try to address this matter in seeking to further limit over-concentration. If this is accepted through the examination process, albeit as indicated above, Inspectors appear to give limited weight currently to this argument. There however may be the ability to still address over-concentration in respect of its impact on vitality and viability of town centres, as its clear from responses to the last Local Plan review that a significant proportion of residents may avoid centres which are considered to have a proliferation of establishments.
- 3.2.37 Any new policy should refer to a more generic term such as licensed gambling establishments. Similarly, the 3% frontage limit in the larger centres such as Wembley, Harlesden and Kilburn High Road is ineffectual, in that there is quite a bit of headroom available. A more tailored approach to limits might be required for some town centres where it can be justified.

3.2.38 Scope of the Local Plan Review

What the review will and will not cover.

- 3.2.39 The review will be informed by three main factors:
 - 1. The National Planning Policy Framework and any further review following its update in December 2024 (the main change was associated with

- addressing housing need through a new standard method). The Local Plan should be consistent with national policy and guidance.
- 2. The revised London Plan and specifically increases in Brent's housing target. Brent Local Plan must be in 'general conformity' with London Plan policies. For Brent the large scale more obvious potential housing sites usually in Growth Areas are part built or have already been identified. This will mean sustaining high levels of delivery beyond 2031 will require additional sites with good prospects of delivery. This is more likely to require new housing on lower density suburban or similar sites that are already occupied by existing homes.
- 3. National development management policies. These may make some of the Local Plan's existing policies redundant, so need to be removed, or may require some local interpretation to make them work better for Brent.
- 3.2.40 The above is currently difficult to predict in terms of likely outcomes. At this stage, in respect of what will be reviewed, it is considered that the basic structure of the Local Plan in terms of setting out a vision, objectives, splitting the borough into places, that also have a vision and strategic outcomes identified, together with policies for larger development sites (allocations) works well and shouldn't be changed. A likely significant change in the borough's housing target to 2046 and possibly beyond will have spatial implications for all areas of the borough, which will likely affect the above sections in terms of detail. In addition, some site allocations have been delivered or have a full planning permission so can be removed from the Plan, whilst new ones will need to be added. To aid their delivery some urban design principles/ indicative site layouts may be beneficial and provide greater certainty of priority outputs being achieved. The continued population growth will require sufficient employment and social infrastructure, and where possible its location to be identified to provide added certainty of its delivery.
- 3.2.41 In respect of the topic area policies sections changes are likely to be required to reflect recent and proposed trends, e.g. during and post Covid the move towards on-line trading will mean some retail uses are diminishing, meaning town centres are at greater risk of contraction, whilst hospitality uses are also struggling, with existing numbers of pubs proving difficult to maintain as viable. The Council will need to review its viability tests/ periods of vacancy that are acceptable to ensure its not unnecessarily maintaining property vacancies. Review of the borough's green spaces indicates an inconsistency in categorisation and levels of protection provided for those not identified. These will need a detailed review and amended policy. The affordable workspace policy will need review to apply it to a lower size threshold of development. It was subject to change during the last examination by the Inspectors as it received objections, which the Council was not allowed to address properly due to submission of additional viability being inadmissible. The amount and concentration of student housing has also become a more pronounced concern for councillors and the Plan will consider how to best address this, balancing up London's strategic student housing needs against Brent's housing priorities including very high affordable housing needs.

- 3.2.42 Partial reviews of Local Plans tend to only be possible where a very limited number of changes are proposed to the Local Plan, e.g. Westminster's focussed on its affordable housing and zero carbon policies. Anything larger than this can end up being confusing and is likely to require justification why other policies are not being amended.
- 3.2.43 Given the scale of likely change related to matters identified above for Brent's Local Plan, it is anticipated a full review will be required. Early participation consultation can ask the question of which policies need review and what needs to be in and out of scope. Where policies are not replaced in their entirety, they may well be subject to minor changes that improve their effectiveness in delivering their objectives/ outcomes to that which was intended.

Rationale for the Review

- 3.2.44 The principal rationale for review is to embrace the need to plan longer term to meet the needs of a growing population to at least 2046 and possibly beyond. The largest priority is to ensure housing delivery can be sustained at high levels in the future. This requires identifying sites well in advance of when they are needed. Due to the complicated nature of future opportunities (the need to parcel up sites that currently include individual homes) this could well be longer than was needed in the past. Large single ownership sites such as Grand Union in Alperton are getting rarer. Sites are more likely to be like 1-22 Brook Avenue allocated in 2011, having publicly been identified 3 years earlier in the draft plan; this only had a comprehensive planning application submitted in 2023 (15 years after first being identified) and it is understood that full site ownership has still not yet been achieved by the applicant.
- 3.2.45 The Local Plan provides clarity to the community, councillors and developers about the long-term changes that are anticipated forthe borough to accommodate sustainable growth. It supports investment and gives a positive message to investors that the Council is supportive of development and the benefits it can bring to the borough.
- 3.2.46 Government requires the Council to keep the Local Plan up to date, with a review of policy content required every 5 years. The NPPF sets out that to be up to date, Local Plan housing targets should have been adopted within the last 5 years to be current/ have significant weight. The new national needs methodology has radically altered nearly all Council housing targets. This will be addressed in the new London Plan. Brent will need to change its Local Plan to reflect these new targets.
- 3.2.47 The consequences of not doing the review will mean the Plan becomes out of date. This will lead to a loss of clarity to residents, businesses and developers on which policies should be used to assess planning applications. Development that is inconsistent with the current Local Plan is increasingly likely to gain permission, e.g. could involve loss of open space, leading to mistrust of the Council's policies and its advocacy in representing residents' needs and priorities.

3.2.48 Many developers praise the certainty that the current Local Plan brings to their investment decisions, which helps them prioritise Brent over other areas where greater risk of delays or costs associated with uncertainty arise. An up to date Plan is part of the wider picture and perception of Brent being a place to do business, which has supported its inward investment and delivering the fourth highest number of homes across London over the last decade. Apart from the direct investment this development makes, comes S106 planning obligations, CIL, New Homes Bonus, Council Tax and Business Rates income that supports the Council's delivery of infrastructure and services for the benefit of its population.

Contextual factors and reasons for undertaking the review e.g. alignment with national policy changes, infrastructure demands, and local challenges etc

3.2.49 This has been covered in the sections above.

Objectives - What the review aims to achieve.

3.2.50 The review seeks to put in place an updated Local Plan that provides a clear direction for how the borough will meet the challenges of population growth and economic challenges, and steer investment and infrastructure to meet needs in the most socially, economically and environmentally sustainable way possible. It will seek to ensure that a sound plan is produced that will pass through the examination process and be adopted by the Council in a timely and cost-effective manner.

Review Approach and Timeline - Process to be followed and key milestones

- 3.2.51 There is currently no certainty on the new Local Plan process in terms of the regulations and national practice guidance being in place, although these are currently anticipated later in the year.
- 3.2.52 In addition, the timelines are also based on the London Plan review timeline; the latest indication is that the draft London Plan will now be published post May 26 elections. Upper tier policies set out by Government and the London Plan are critical to the content of the Brent Local Plan which must be consistent with and should not needlessly duplicate them.
- 3.2.53 The expectation is that revised London Plan will not contain any 'surprises' for boroughs, however, to date GLA officers have not shared much of their emerging evidence base or policy options. There is no clarity yet on what the Plan will seek to do in respect of meeting the up lift in London's housing needs target set by the Government and how it will balance this against other priorities it has identified, e.g. retention of/ provision of additional industrial land, other development to meet the growing population's needs.

- 3.2.54 The GLA will, for the first time, be carrying out a review of the Green Belt boundaries, in line with central government's policy direction. It is anticipated that there may well be large scale revisions to the Green Belt boundaries suggested, albeit the GLA might leave the detailed changes to boroughs to deliver through Local Plan reviews. Although Brent does not have a Green Belt boundary, if the policy is changed to allow significant amounts of housing on current Green Belt land, then it may reduce the housing target for Brent and other non-Green Belt authorities. In any event, it is anticipated that a Green Belt review (and release/ redesignation as grey belt) will be a lengthy and controversial process.
- 3.2.55 The Local Development Scheme sets out a high-level timetable:
 - Scoping and Early Engagement March 2026
 - First Formal Consultation January 2027
 - Second Formal Consultation January 2028
 - Examination June 2028 Adoption January 2029.

Engagement Strategy - How stakeholders, including scrutiny committee members, will be involved throughout the review/refresh.

- 3.2.56 It is likely that engagement will be like that undertaken for the current Local Plan. The most intensive period of engagement is in the earliest stages. For example, for the last Local Plan early consultation included:
 - An internal visioning and objectives session occurred with all managers and above (Heads, Service Directors, Corporate Directors) before any public consultation started. This sought to identify key issues for the Plan to address, this was supplemented by attendance at individual team meetings/ management meetings. A facilitated 2-hour session also occurred with CMT.
 - 5 Drop-in sessions, which allowed members of the public to meet the team and discuss the issues and options in person
 - 9 Workshops, where a presentation on the issues and options were provided, with group discussions on how it could be improved
 - Targeted workshops and drop-in sessions were held with groups that are sometimes underrepresented in consultation events: - Brent Youth Parliament - Brent Multi-faith Forum - Disability Rights and Politics (DRAP) Brent - Parents with young children via Barnardos' children's centres.
 - Councillors through Brent connect forums, the drop-in sessions and workshops, plus the Local Plan Working Group (more below in governance section).

The consultation was promoted under the brand Shape Brent using the following methods:

- Social media Twitter, Facebook, Yammer using #shapebrent
- Eventbrite
- Leaflets and posters/roller banners in Council Buildings
- Posters in Park Notice Boards
- Exhibition and flyers at Drop in Sessions
- Emailing Local Plan and Community Database
- Emailing Brent Citizen's Panel
- E-newsletter
- Promoting at Brent Connects Events and via Brent Connects mailing list
- Emailed to partner contacts e.g. Brent Housing Partnership and CVS Brent
- Main Council webpage and dedicated website www.brent.gov.uk/shapebrent
- The Brent Magazine summer and autumn issues
- Article in Brent & Kilburn Times
- Elected Members' News bulletin.

There was an interactive map through Common Place that allowed residents/ anyone to comment on any part of the borough in terms of what they liked/didn't like and what should be improved through the Plan.

In addition to this were forums for developers/ registered providers/ property owners/ investors. There was also engagement with statutory consultees for example the Environment Agency in relation to the Strategic Environmental Assessment that accompanies the Plan and boroughs/ agencies/ infrastructure providers related to the Duty to Co-operate.

There were two further formal consultation periods (preferred options and draft Plan publication) with similar forms/ levels of engagement. This included a leaflet delivered to every household in the borough for the preferred options draft Plan.

3.2.57 The Brent Local Plan, including its consultation and engagement processes were recognised as very good practice, being recognised in 2023 as the Best Local Plan in the RTPI's London awards and shortlisted in the national awards.

Governance & Decision-making - Roles and responsibilities of officers, members, and oversight arrangements.

- 3.2.58 To involve councillors more closely throughout the Local Plan adoption process, last time a Local Plan Working Group was set up. This comprised 10 councillors from all political parties with representation across the borough. Councillors were invited by the Cabinet member. It met regularly at all 12 times prior to the submission of the Plan. A similar approach is likely with the review.
- 3.2.59 To reduce the time taken to get the Plan to the submission stage, consultation material and the early draft versions of the Plan were subject to delegated agreement by the Cabinet member in consultation with the Corporate Director. Cabinet agreed the final Plan for submission for examination. To assist through the examination process officers were delegated to propose modifications that

would enable the Plan to be found sound. Formal approval of the final modifications to be consulted upon was again delegated to the Cabinet member in consultation with the Corporate Director. Adoption of the Plan was by Full Council, following consideration by Cabinet. Again, a similar process is anticipated for the review

Risks and Challenges - Identification of potential risks, including budget, resourcing, and delivery challenges.

- 3.2.60 The timetable suggested in the LDS is in part seeking to reduce the potential risks associated with changes to the NPPF, national development management policies, the changes to the Local Plan system bedding in and the London Plan review. A very early start on the review would increase the number of fundamental risks that could arise. For example, in respect of the London Plan, the Council must be relatively clear about the likely housing target it will be set. Radical changes to that Plan could have significant impacts on Brent's policies. Large changes in population numbers due to London Plan policy changes could impact on evidence base studies to support the Local Plan and, also the strategy for the development of the borough. This might lead to delay or expensive revisions to the evidence base, or the Council going back to an earlier stage of the Local Plan process to address these issues.
- 3.2.61 In respect of budget, the Cabinet paper has been pitched at a realistic point in terms of assumed cost of £880K. This is above the lower end estimate of £500K which would require much of the evidence base work to be done in house, leading to increased time and resource being pulled away from other planning activities. The upper end estimate is £1.6million, which assumes greater level of evidence base required/ higher evidence base costs due to capacity constraints as many Councils will be doing a Local Plan review, a protracted examination/ adoption process, and if the Council is not successful in addressing known needs from the overcrowding at Lynton Close prior to the review, site allocations being required for traveller pitches.
- 3.2.62 Staff resources although the core team is currently stable, should this change, recruitment challenges within the wider planning sector could impact on the Council's ability to progress with the review.
- 3.2.63 Legal and procurement support will also be critical.
- 3.2.64 To date much of the population of Brent has accepted the ambitious levels of development that the last Local Plan promoted. The next Local Plan may well have to deal with accommodating more development amongst suburban housing, most of which will be in good condition and privately owner occupied. As well as potentially affecting more people's homes, it could more likely to result in more areas having more substantial changes in character compared to currently. This may well increase the amount of objection and challenge to the plan from Brent residents or community groups. This could again slow down the plan's delivery, requiring further levels of engagement and revision to plan content or policy direction.

- 3.2.65 In respect of the Plan's ambitions, given the viability and construction challenges, the ability of the sector to deliver significant numbers of homes of all tenures, is a risk to the delivery of the Plan's policies.
- 3.2.66 In addition, Government's Housing Delivery Test (which tests housing delivery against Local Plan housing targets over the last 3 years) and Five Housing Land Supply test (which requires sufficient supply of deliverable housing sites to achieve the next 5 years' Local Plan housing targets) if not delivered can have significant implications for the Plan. In such cases, the Plan risks being considered out of date in respect of some of its policies, or alternatively limited weight being placed on them. This might mean the undermining of core policies, e.g. protection of/ retention of open space, or industrial land. Not being able to placing significant weight on Local Plan policies may mean that Planning Committee in reflecting residents' concerns about outcomes inconsistent with the Plan's policies in any case refuse permissions. This may lead to more appeals being submitted and at its extremes risk of the Council paying developer costs where it cannot reasonably defend decisions overturned by the Planning Inspectorate.

4.0 Financial implications

- 4.1 It is considered that when funding for the review is agreed, processes will be in place to ensure that the identified budget is adhered to.
- 4.2 The Local Plan is a significant element in supporting development delivery. This has positive implications for the Council's income in respect of New Homes Bonus, Council Tax, Business Rate Uplift, CIL and S106 contributions for infrastructure plus, affordable housing grants and other government funding streams that might become available to support growth.

5.0 Stakeholder and ward member consultation and engagement

5.1 The appropriate levels of consultation and engagement consistent with the Council's Statement of Community Involvement regarding Local Plans will be undertaken. The Lead Member will be kept regularly updated on progress.

6.0 Legal Considerations

6.1 The processes will be consistent with the relevant Regulations once they have been enacted. Prior to adoption by the Council the draft Local Plan will have some limited weight in the determination of planning applications, post adoption the weight will be significant.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

7.1 The Equality Act 2010 introduced a new public sector equality duty under section 149. It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Council must, in exercising its functions, have 'due regard' to the need to:

- a) Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- b) Advance equality of opportunity between people who share a protected characteristic and those who do not.
- c) Foster good relations between people who share a protected characteristic and those who do not.
- 7.2 The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.
- 7.3 The Local Plan review will be subject to full equality impact assessment.

8.0 Climate Change and Environmental Considerations

8.1 The Local Plan is required to support sustainable development. There may be a requirement to include policies that are Brent specific if climate change and environmental considerations are not appropriately addressed in national policy, national development management policy or London Plan policy.

9.0 Communication Considerations

9.1 Consistent with the approach to the previous Local Plan review, there will be an appropriate level of communication's team support to raise awareness, e.g. through press releases/ council social media notifications to complement the engagement measures set out in the Councils' Statement of Community Involvement.

Related documents:

London Plan March 2021

Brent Local Plan 2019-2041

National Planning Policy Framework Dec 2024

Report sign off:

Alice Lester

Corporate Director, Neighbourhoods and Regeneration





Resources and Public Realm Scrutiny Committee

2 September 2025

Report from the Deputy Director, Democratic and Corporate Governance

Scrutiny Recommendations Tracker

Wards Affected:	All
Key or Non-Key Decision:	Non-Key Decision
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:	Appendix A - Scrutiny Recommendations Tracker
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Jason Sigba, Strategy Lead – Scrutiny, Democratic & Corporate Governance Jason.Sigba@brent.gov.uk Amira Nassr, Deputy Director, Democratic & Corporate Governance, Finance & Resources 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 for consideration.

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 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.
- 3.2.2 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.
- 3.2.3 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.
- 3.2.4 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 and Corporate Governance



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.

Suggestions for improvement from RPRSC to Council departments/partners

Meeting date and agenda item	Suggestion for improvement	Council Department/External Partner	Response / Status
27 Feb 2024 – Draft Property Strategy	Upon completion, sight the Committee on the draft Corporate Social Benefits Assessment Methodology for feedback.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	Response received on 12/04/24: 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. Updated response received on 01/11/2024: 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 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. Updated response received on 13/08/2025: A significant redraft of the Social Value Policy which adopts a more modern approach is well underway. The approach is seeking to blend a traditional quantitative view of measures and targets with a longer term collaborative development of community wealth building. It is intended to share a draft of the new Policy ahead of the planned meeting in November, to then discuss with the Committee with the new Policy becoming effective from April 2026.
	Upon completion, publish the final Corporate Social Benefits Assessment Methodology for the benefit of residents, businesses, and community organisations.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	Updated response received on 13/08/2025: A significant redraft of the Social Value Policy which adopts a more modern approach is well underway. The approach is seeking to blend a traditional quantitative view of measures and targets with a longer term collaborative development of community wealth building. It is intended to share a draft of the new Policy ahead of the planned meeting in November, to then discuss with the Committee with the new Policy becoming effective from April 2026.
25 Feb 2025 - Commissi oning, Procurem ent, Communit y Wealth- Building, and Social Value	Engage residents in understanding community wealth building and social value, highlighting their key roles in council activities, particularly in procurement and commissioning.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	Response received on 13/08/2025: Two related initiatives are underway to support resident engagement and understanding of Community Wealth Building and Social Value: The Council recently agreed a contract to launch Match My Project. This is intended to broker suppliers' commitments and capacity to deliver Social Value with the needs of local residents, community and voluntary groups who will be engaged as part of the process. Wider consultation of the development of the new Social Value Policy (as outlined above) will take place Autumn 2025. A key aim is to facilitate greater community involvement in shaping priorities.
Value			A key aim is to facilitate greater community involvement in shaping priori and promoting the contribution community wealth building and social value

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Revise the official council report template to include dedicated sections for Community Wealth Building and Social Value Considerations, ensuring these factors are assessed and reported in all council reports where relevant.	Amira Nassr– Deputy Director, Democratic & Corporate Governance, Finance & Resources	have in addressing community needs, ensuring the best possible value for money for Brent, supporting local businesses and job creation, tackling inequalities and helping communities thrive. Understanding community needs and priorities and developing commissioning and procurement so that it better addresses these by using approaches like community engagement, market shaping and co-production is being supported by development of a commissioning framework and the procurement improvement programme. Response received on 11/06/2025: This will be revisited in April 2026 once the procurement and social value policies have been formally adopted.
Explore how credit unions and the	Rhodri Rowlands –	Response received on 13/08/2025:
promotion of their services can be embedded within Community Wealth Building initiatives to strengthen financial inclusion, enhance local economic resilience, and provide greater support for residents.	Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	This can be considered and if viable included as part of the role out of the Match My Project initiative, referenced above. The Council is also seeking advice from Centre for Local Economic Strategies (CLES) – a leading voice on community wealth building to inform this.
Develop a robust, systematic	Rhodri Rowlands –	Response received on 13/08/2025:
approach to reviewing service contracts that enables transparent, evidence-based decisions on preferred forms of delivery (e.g., in-house, outsourced, or hybrid), guided by defined criteria, detailed cost-benefit analysis, and internal capability assessments.	Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	 As part of the general approach to re-commissioning of services towards the latter part of a contract term, full consideration should be given to the following: Stage 1: what are the future needs/demands for the particular service; what can the Council afford and what other organisations (public, private or voluntary) are already operating in or delivering services in this area. The approach is evidence based and looks at prevailing good practices in other organisations. Once the above is established then Stage 2 can consider all the viable service delivery options such as in-house, outsourced, shared delivery etc. Criteria to evaluate these options are established as part of the process and usually include a) overarching principles such as how the service would best meet needs or align to the council priorities/plans; b) specific criteria

Promote and support the long-term sustainability of voluntary and charity sector (VCS) organisations in the council's revised commissioning and procurement frameworks, where legally permissible. This should include a focus on removing and/or reducing barriers to VCS organisations participating in council tender activities.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	for each service and c) detailed financial modelling of each short listed option. • The outcome of these determinations inform decisions on future contracts. Members would typically be consulted as part of the process and any decision should have the non-sensitive information in the public domain. The Council already has some toolkits to support this approach and as part of the Procurement Improvement programme launched in summer 20205, one of the workstreams (Procurement Operational Excellence) will review this. Response received on 13/08/2025: The Council has commenced drafting a new Procurement and Commissioning Strategy which following consultation it is intended will be live from April 2026. This will consider how best to engage with the VCS sector as well as local organisations and where possible lowering barriers for entry for both groups. The new Strategy fits within the Procurement Improvement Programme. A procurement plan has also been adopted which sets out expected procurement activity between April 2025 and October 2026. The plan will support opportunities / procurements with the potential for local VCS provision. This will be supported by renewed focus on market shaping through commissioning which will promote and support local VCS and other local provision by removing or mitigating barriers to participation. The Council is also working closely with VCS partners to review the capacity building support required to enable a more resilient and sustainable VCS sector that is better able to participate in council tender activities. And a review of community grants and funding is in progress that will explore ways to optimise and streamline council funding mechanisms so that funding can be accessed and provided where it can realise greatest impact in the VCS.
Subject to risk analysis, explore additional joint procurement opportunities with neighbouring boroughs to leverage collective buying power, share best practices, and support local	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	Response received on 13/08/2025: Joint procurement with neighbouring authorities is one of the service delivery options referenced in the response above and should always be considered in relevant areas.

suppl			It should be noted that the benefits arising from increased economies of scale from larger/joint procurements be measured against the risks of loss of control, increased complexity and longer timescales to put arrangements in place that can arise from collaborative arrangements.
			One of the enabling principles behind the Procurement Improvement Programme is to strengthen Brent's procurement profile and engagement with sector networks and forums. This will support identification of best practice, opportunities to draw on learning from elsewhere and build partnerships. Examples of this have already been acted on through the Procurement Improvement Programme.
			A procurement plan has been adopted which sets out expected procurement activity between April 2025 and October 2026. The pipeline will be used to identify priority opportunities / procurements with the potential for exploring joint or additional procurement opportunities and approaches with neighbouring boroughs. This will build on the arrangements that are actively place in respect of various services, for example West London Alliance.
acros value comm	mitments, including fair trade efforts to combat climate	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	Response received on 13/08/2025: It is intended to continue with these arrangements so long as they remain council priorities and policies. The new Social Value Policy and Procurement Strategy being drafted as part of the Procurement Improvement Programme will reference these and consider opportunities to further strengthen these commitments in procedures where possible and build into the Council's Community Wealth Building approach.
future requi proace trans according should respond to the first proace trans according to the first proace trans to the future responds to the future requirements to the future requirement requirements to the future requirements to the future requirements to the future requirements to the future requirements to th	iring suppliers to demonstrate	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	Response received on 13/08/2025: A Procurement Improvement Programme has been established through which procurement and related service improvements will be delivered. The Programme was formally adopted in May 2025. The Procurement Improvement Programme includes a workstream on procurement operational excellence. All procurement procedures, processes and guidance will be updated to reflect recommendations identified by Committee as well as all other improvement requirements and service enhancements opportunities. These considerations can be considered in the drafting of the new Procurement Strategy and any review of Council terms and

		conditions, to the extent that they reflect Council policy, are lawful and equitable.
Where legally permissible, acknowledge and incorporate external financial contributions secured by VCS organisations that are linked to the tender into procurement evaluations, ensuring these funds are recognised as part of social value and community wealth building.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	Response received on 13/08/2025: A Procurement Improvement Programme has been established as a single forum through which procurement and related service improvements will be delivered. The Programme was formally adopted in May 2025. The Procurement Improvement Programme includes a workstream on procurement operational excellence. All procurement procedures, processes and guidance will be updated to reflect recommendations identified by Committee as well as all other improvement requirements and service enhancements opportunities. The purpose of this suggestion for improvement needs to be better understood before providing a response.
Explore integrating factors such as organisations whose staff pay council tax and those paying business rates within the borough into the social value and community wealth building criteria for procurement evaluations, where legally permissible.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	Response received on 13/08/2025: As part of the Procurement Improvement Programme there is a workstream to update both the Procurement Strategy and Social Value Policy and this will explore the extent to which future procurement activity can analyse this suggestion for improvement to understand whether it is both feasible and legal. The Council is also seeking advice from Centre for Local Economic Strategies (CLES) – a leading resource for community wealth building on this.
Where practicable, ensure procurement contracts include tailored social value commitments, encouraging bidders to shift from 'in-kind agreements' to direct investments in existing or planned council-led initiatives that deliver tangible benefits to local communities.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	Response received on 13/08/2025: A Procurement Improvement Programme has been established through which procurement and related service improvements will be delivered. The Programme was formally adopted in May 2025. The Procurement Improvement Programme includes a workstream to update both the Procurement Strategy and Social Value Policy and this will explore the extent to which future procurement activity can consider reflecting this recommendation. As referenced above, a significant redraft of the Social Value Policy which adopts a more modern approach is well underway. The approach is seeking to blend a traditional quantitative view of measures and targets with a longer term development of community wealth building.

			It is intended to share a draft of the new Policy ahead of the planned meeting in November, to then discuss with the Committee.
	Strengthen collaboration between suppliers and Brent Works and Employment Services Team to actively facilitate the targeted recruitment of local and underrepresented residents into job opportunities created through procurement.	Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy Kibibi Octave – Director, Community Development, Children, Young People & Community	Response received on 13/08/2025: This suggestion for improvement can be considered as part of the role out of the Match My Project initiative, as referenced above.
	Develop a publicly accessible contract performance dashboard to track and report on key metrics, including social value commitments, ensuring transparency and clear accountability for contract outcomes.	Development Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	Response received on 13/08/2025: The Procurement Act 2023 requires Councils to publish Key Performance Indicators (KPIs) for all contracts valued at over £5 million at least once every 12 months. A Procurement Improvement Programme has been established through which procurement and related service improvements will be delivered. The Programme was formally adopted in May 2025. The Procurement Improvement Programme includes a workstream on procurement operational excellence. All procurement procedures, processes and guidance will be updated to reflect recommendations identified by Committee as well as all other improvement requirements and service enhancements opportunities. As part of this additional performance measures will be considered for public reporting.
23 April 2025 – Build Quality in Brent	Conduct a survey to identify which council-owned buildings may fall within the scope of the Building Safety Act 2022 and/or the Defective Premises Act 1972 in relation to relevant defects, and assess whether there is potential for legal recourse.	Tanveer Ghani – Director, Property & Assets, Neighbourhoods & Regeneration	Response received on 07/07/25: Officers have identified two projects (Housing and Education) that may fall within the scope of the Building Safety Act 2022 and/or the Defective Premises Act 1972. Work is being undertaken to assess if/where they may be potential for legal recourse. A further update will be provided by 9 January 2026.

	Undertake a sampling review to assess design changes from the planning stage through to practical completion, and determine whether these changes have impacted build quality.	Director, Property & Assets, Neighbourhoods & Regeneration	Response received on 07/07/25: Officers propose to undertake a sampling of three projects, one from each the following areas: • Education • Housing • Regeneration A further update will be provided by 9 January 2026.
23 April 2025 – Complaint s Annual Report 2023/24	party providers that enable the council to recover costs incurred		Response received on 13/08/2025: Contracts with service providers contain key performance indicators which the respective contract managers monitor and report – escalating as appropriate if issues become significant. Third party providers will also have complaints processes in relation to their own service delivery and these should be exercised when the complaint is about the third-party provider, rather than the council itself. Each contract will contain provision for a supplier's failure to perform which range from their duty to make good any service failures, liquidated damages if the cost of their failure has been pre-estimated, to the council's right to terminate the contract at no cost to the Council (though this would be last resort given the inconvenience and cost in procuring a replacement). Close and proactive management of suppliers and a collaborative relationship is a primary means of preventing service failure by monitoring trends in the KPIs and acting before failure. In many situations, and unless pre-agreed, the council cannot impose fine to compensate residents as this may be seen as a penalty and unlawful. If the council were to adopt an approach in the future that sought to penalise suppliers for each service failure then a) suppliers would assess the risk of this during the bidding process and factor in additional cost to their price and b) suppliers may be unwilling to submit a bit if the balance of risks in the contract were tilted too far one way.

16 July	Deliver a member briefing session	Chris Whyte –	Response received on 22/08/25:
2025 –	on the council's recycling	Director, Public Realm,	
Update on	initiatives, outlining current efforts	Neighbourhoods &	We have in the past delivered a session on waste and recycling to our lead
Recycling	and opportunities for members to	Regeneration	member. Similarly, we can organise a session for other interested members
in Brent	support promotion to constituents.	_	and talk through performance data and recycling initiatives in the borough. We
			can make members aware of the ongoing communications campaign so that
			those could be promoted to our residents widely. We will liaise with democratic
			services colleagues to get dates of upcoming members meetings so that we
			can plan a session.
	Strengthen collaboration between	Chris Whyte –	Response received on 22/08/25:
	recycling, housing management,	Director, Public Realm,	
	and regeneration teams to	Neighbourhoods &	We do already work together with housing and regeneration teams. The
	improve the robustness and	Regeneration	Recycling team carries out joint visits with housing, signpost where necessary
	accessibility of waste and	1 togotioration	and share information. For new builds we have a waste and recycling policy
	recycling infrastructure in new		document. This policy is followed whereby, Veolia and Brent work with
	builds and estate upgrades.		managing agents to ensure correct waste and recycling facilities are built and
	bullus and estate upgrades.		installed, however, further work is needed with planning. One of our
			neighbourhood managers is consulted on all new builds. We are also involved
			in St Raphael's waste and recycling facilities upgrade via our regeneration team
			and will be carrying out our own programme to upgrade bins/facilities at all Brent
		01 : 14/1 1	Housing Management estates.
	Strengthen outreach and boost	Chris Whyte –	Response received on 22/08/25:
	engagement with young people to	Director, Public Realm,	
	increase awareness and	Neighbourhoods &	There is already a range of waste and recycling awareness activities taking
	participation in recycling initiatives	Regeneration	place with primary and secondary schools in the borough in partnership with
			our climate team colleagues. The age group of 18-24 years are notoriously
			the most difficult group to engage with on the topic. However, we will look to
			target this audience with paid ad campaigns on social media.
	Enhance and diversify	Chris Whyte –	Response received on 22/08/25:
	communication efforts and	Director, Public Realm,	
	strengthen collaboration with local	Neighbourhoods &	Contamination monsters' campaign is being run as a gold campaign by the
	partners to raise awareness about	Regeneration	council's communications team. We rely on them to push the campaign as we
	nappy disposal and recycling		do not have direct access to the council's media channels. We are working with
	options.		our communication team to organise and develop a strategy to increase
			engagement and reach a measured impact. Information on contamination
			monster campaign can be found at: https://www.brent.gov.uk/bins-rubbish-
			and-recycling/bin-monsters including a helpful video, which both customer
			services and recycling teams signpost to residents found contaminating
L			The state of the s

cour requ uphe	ıncil waste and recycling uirements are consistently	Chris Whyte – Director, Public Realm, Neighbourhoods & Regeneration	recycling. Coverage has included paid social ads, JCD board coverage, in person communications, and Brent magazine features. We do have more autonomy on our point-of-sale communications which the team are always developing and evolving and see the most impact here by way of visual stickers, tags, letters and in person visits. The reusable nappy voucher scheme in partnership with Real Nappies for London has been a success so far with 68 parents registered since launch in April 2025 and 35 vouchers issued. This scheme was promoted via social media, Brent magazine, through partner communications as well as at Brent library parent events. Response received on 22/08/25: We are working closely with housing associations to improve recycling performance, increase resident engagement, and reduce contamination levels. Where voluntary cooperation falls short, our enforcement team retains the ability to issue formal notices under Section 46 of the Environmental Protection Act 1990. However, legislative changes introduced in 2015 have significantly limited the effectiveness of this enforcement mechanism, making it more challenging to apply robust action against non-compliant housing associations.
		Chris Whyte –	Response received on 22/08/25:
robu		Director, Public Realm,	
		Neighbourhoods &	The current caddy liners supplied are industry standard and is accepted at our
	•	Regeneration	food waste recycling facility. As the packaging industry is constantly changing,
food	d waste recycling service.		we can certainly explore other alternative options to caddy liners. We will speak to other local authorities and sector partners to find other robust solutions.

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16 July 2025 – Scrutiny Recomme ndations Tracker: Follow-Up Discussio n on the Complaint s Annual Report	Collaborate with the procurement and complaints teams to assess how complaints data and areas of underperformance can be more effectively embedded into the management and monitoring processes of the Wates contract, and the upcoming Mears contract.	Spencer Randolph – Director, Housing Services, Resident & Housing Services	Response received on 29/08/25: In progress. The Housing Quality Assurance and Standards Team are working closely with Corporate Complaints and Digital to improve the use of complaints data across the service. This includes changes to the Dynamics RFC system, regular Power BI reporting and other insight-led reporting. A new governance framework (complaints 'line of sight') is also being implemented which will ensure the performance is being scrutinised, and learning monitored by the right people and at the right frequencies.
2023/24			The Housing Quality Assurance and Standards Team have recently met with Corporate Procurement to discuss ongoing training opportunities, corporate approaches for contract management / tools, and closer working opportunities. A new contract monitoring framework has been developed by the Repairs Service which will be implemented to ensure that the service is holding contractors accountable, and have a clear record of notices (performance notices, improvement notices etc). This will cover all KPIs including complaints data. Complaints performance will also be monitored regularly in partnership with the Customer Insight leads at both Wates and Mears, where opportunities for improvement in resident outcomes can be agreed.
	Develop a communication standard in collaboration with key contractors, such as Wates and Mears, to ensure consistent, transparent, and high-quality engagement with residents throughout the repairs and complaints journey.	Spencer Randolph – Director, Housing Services, Resident & Housing Services	Response received on 29/08/25: In the 2026 QA work plan. The Housing Management Improvement Plan (July 2024) identified a workstream to improve 'the services we deliver are easy to access, well communicated and can be tailored to meet individual needs.' To deliver this, it has been agreed that a communications guidance document will be created for all interactions across the service, including services delivered by contractors. The Housing Quality and Assurance Team will lead on a review into case management communication, and work closely with the Customer Insight leads at both Wates and Mears to develop a communication standard to be adopted and monitored against (e.g. through a programme of case audits).

		The review will consist of staff workshops to be held to pick out the common issues with communication throughout cases. Followed by resident consultation to hear their experiences and co-design solutions. A standard and guidance will then be developed for Officers and Managers which explains the importance of communication, including risks, and details a step-by-step approach. This is an example of the work that will be embedded across Housing Services (adopted by all landlord services, including those delivered by SLAs or contracts) and create a strong foundation for culture improvements.
Establish mechanisms that enable residents to play a meaningful role in monitoring the performance of the repairs service and in holding both the council and contractors accountable.	Spencer Randolph – Director, Housing Services, Resident & Housing Services	Response received on 29/08/25: In progress and ongoing. In June 2025, the Housing Management Advisory Board, representative of tenants, leaseholders, and independents was set up to monitor, work with and hold the service accountable. The delivery of repairs (and repair contract management) is key area of the Regulator of Social Housing's Safety and Quality Standard as well as Housing Ombudsman spotlight best practice. The Board's forward plan will be devised around effective scrutiny and assurance of the delivery of the improvement plan and as a result, compliance with the RSH's Standards. The new Head of Housing Quality Assurance, Engagement and Insight role (September 2025) has been created to ensure there is a stronger link between our resident satisfaction and outcomes, performance, engagement activities, assurance reviews and service improvement. Repairs is a top area of focus for our residents and so high quality engagement activity in this area will be prioritised in the development of new work plans, with consideration of new and innovative engagement approaches across the sector. The new repairs contractors have contractual requirements to engage with resident engagement activity including but not limited to walkabouts, meetings, newsletters, events and visits.

	Ensure regular reporting on the performance management of the Wates and Mears contracts to the Community and Wellbeing Scrutiny Committee.		Response received on 29/08/25: In progress. As part of the mobilisation of the new repairs contracts are mobilised, new reporting will be developed to capture the KPI framework stipulated in the contracts. A forward plan of regular reporting to key stakeholders will also be developed and signed off, and that will include the Community and Wellbeing Scrutiny Committee. Data validation and report building is currently underway.
	Develop and implement a robust guidance framework for succession planning to be rolled out across relevant internal teams and extended to contractors, with a specific focus on managing staff turnover and maintaining continuity of service in the delivery of repairs for residents.		Response received on 29/08/25: In the 2026 QA work plan. The Housing Quality and Assurance Team will lead on a review into case management handovers and succession planning. The review will consist of staff workshops to be held to pick out the common issues with handovers. Followed by resident consultation to hear their experiences. This will result in the development of a guidance document for staff leaving their roles, and relevant managers which explains the importance of continuity of service, including risks, and details a step-by-step approach. This is an example of the work that will be embedded across Housing Services (adopted by all landlord services, including those delivered by SLAs or contracts) and create a strong foundation for culture improvements.
16 July 2025 – Budget Update: Medium Term Financial Strategy	In future finance reports, provide detailed information on the balance of unallocated CIL funds, how they are being factored into financial planning, and their contribution to achieving the Council's strategic priorities and long-term objectives.	Deputy Director,	Response received on 30/07/25: This will be undertaken in future reports.
3	In future finance reports, provide detailed analysis of Council Tax collection, including any ongoing		Response received on 30/07/25: This will be undertaken in future reports.

assessment of the current Council	Planning, Finance &
Tax Support Scheme's impact on	Resources
collection rates, and the outcomes	
of initiatives aimed at improving	
collection performance.	

Information requests from RPRSC to Council departments/partners

Meeting date and agenda item	Information requests	Council Department/External Partner	Responses / Status
4 Sept 2024 – Delivery of Affordabl e Housing by i4B Holdings Ltd and First Wave Housing Ltd (FWH)	Provide Asset Management Strategy upon completion.	Sadie East – Director, Communications, Insight & Innovation, Service Reform & Strategy	Response received on 07/10/24: This will be presented to the i4B/FWH Board meeting on Thursday 28th November and, dependent on any feedback from directors and further work required, will be available to share with the committee in December 2024. Updated response received on 14/02/25: The draft strategy was presented at the December i4B/FWH Board meeting. The Board have requested more detailed financial analysis which is to be implemented into the business plan. The strategy is expected to return to the Board in February/ March 2025 for approval. Updated response received on 15/04/25: The draft strategy was presented at the December i4B/FWH Board meeting. The Board has requested more detailed financial analysis. The strategy is expected to return to the Board in early summer 2025 for approval. Awaiting further response.
	Provide a breakdown of the expected costs associated with enhancing energy performance	Sadie East – Director, Communications, Insight & Innovation,	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 28th November and,

	and retrofitting the i4B/First Wave Housing stock.	Service Reform & Strategy	dependent on any feedback from directors and further work required, will be available to share with the committee in December 2024. Updated response received on 14/02/25: The draft strategy was presented at the December i4B/FWH Board meeting. The Board have requested more detailed financial analysis which is to be
			implemented into the business plan. The strategy is expected to return to the Board in February/ March 2025 for approval.
			Updated response received on 15/04/25:
			The draft strategy was presented at the December i4B/FWH Board meeting. The Board has requested more detailed financial analysis. The strategy is expected to return to the Board in early summer 2025 for approval. **Awaiting further response**.
25 Feb 2025 – Quarter 3 financial Forecast 2024/25	Provide a detailed breakdown of compensation payments made, categorised by claim type, along with the associated legal fees incurred over the past five years.	Darren Armstrong – Deputy Director, Organisational Assurance & Resilience, Finance & Resources	Response circulated to committee on 29/08/2025.
25 Feb 2025 - Commissi oning, Procurem ent,	Provide a detailed breakdown of commissioned services income received over the last three years, categorised by organisation type.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	Response to be provided by 19 September 2025.
Communit y Wealth- Building, and Social Value	Provide a detailed breakdown of funding allocated to externally commissioned services, distinguishing between organisation types—private companies (small and mediumsized enterprises (SMEs) and large enterprises/corporations),	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	Response to be provided by 19 September 2025.

VCS organisations, and social enterprises—while also indicating whether each organisation is local or non-local.		
Provide details, including examples, of how the council supports local SMEs in its procurement process.	Rhodri Rowlands – Director, Strategic Commissioning, Capacity Building & Engagement, Service Reform & Strategy	Response received on 20/08/2025: Examples provided below. A Procurement Improvement Programme has been established through which procurement and related service improvements will be delivered. This will include a strong focus on further supporting local SME's through the procurement process including through early engagement and consultation on the procurement strategy and social value policies.
		Community Wealth Building & Business Summit Event held in March 2025, focused on community wealth building through increasing knowledge around public procurement, connecting local suppliers to contract opportunities and encouraging anchor institutions to use local suppliers. Over 100 SMEs attended. Evaluation is being developed with Branduin Business Support and will inform future events and engagement.
		Fit to Bid Supplier/SME Development Programme Provided by Branduin Business Support and held between January-March 2025, the programme was targeted at Brent's local supply-chain capacity, helping local businesses be in a better place to win new and larger contracts in the Borough of Brent, and therefore, grow their confidence with a commensurate improvement in well-being and material outcomes.
		1:1 SME tender support sessions Delivered as part of Fit to Bid and in conjunction with Brent Procurement - high impact 1-2-1 tender advice sessions were delivered, resulting in 36 unique SME interventions.
		Procurement Act 2023 – SME / Supplier Engagement Session at CWB Business Summit in March 2025 to inform SME/ suppliers of the Procurement Act 2023 and opportunities for SME's through more flexible procedures.
		SME skills programme

110 attendees across a series of modules designed to build capacity and skills to support SME's to be better placed to bid for tenders. Run between January and March 2025.

Market Shaping

Informed by the Procurement Plan, contract opportunities with scope for greater local SME / VCS provision have been supported through various market shaping, engagement sessions:

- Pre-market Engagement Exercises: involving both local and national suppliers to input into the process for procurement processes
- Tender workshops: into recent tenders to provide suppliers with information on tender documents and guidance on submission tailored to SMEs. For example, Church End Youth Anchor and Clement Close Supported Living Services, various building and construction contracts.
- Tailored questions: for example, the Homecare Framework which involved use of simple pass/fail experience questions, which helped 74 tender submissions, including 71 from SMEs

Procurement Processes and Policies

- Updated guidance for SME / suppliers on registering on the Council's Procurement Portal as a prospective tenderer and to benefit from sight of future procurement opportunities
- **Prompt payment commitments**: ensuring local suppliers, are paid promptly via the P2P process
- RFQ (request for quotes) Procurement Process: requiring at least one local supplier to be considered
- **Simplified tender documents**: reduction of technical 'jargon' in documentation
- Social value weighting: current evaluation criteria that reward economic contributions to the local area (e.g. local job creation, use of local supply chains)
- Supplier Engagement and Networking: events targeted towards local suppliers / small businesses with the intention of building trust in the council's commercial activities, improving transparency, and ensuring the council is more inclusive and SME-friendly.

25 Feb 2025 – Emerging Employm ent Strategy 2025-2030	Provide an update on the Roy Smith House initiative after its reopening, measuring its effectiveness in addressing the challenges outlined in the Stonebridge Outcome Based Review (OBR) and reviewing the outcomes of the council's Market Rent Reduction Framework.

Sadie East - Director, Communications. Insight & Innovation, Service Reform & Strategy

Response received on 14/04/25:

The commercial unit at Roy Smith House is part of the test of the council's new Market Rent Reduction Framework, which is designed to allow local voluntary and community sector (VCS) organisations to have a reduced rent for council assets where they can demonstrate delivery of significant community value from their proposed use of the asset.

Three bids were received for Roy Smith House from VCS organisations and were evaluated in March 2025. All bidders have been notified of the outcome of their bids and the comparative merits of their bid in comparison to the highest scoring bid.

Officers are due to meet with the highest scoring bidder later this month to understand their proposal in more detail and discuss/agree heads of terms for a new lease.

The organisation with the highest scoring bid demonstrated a proven track record of delivering community value and positive outcomes for residents. including opportunities to build confidence, skills and become more employable.

Pending the outcome of negotiations, agreed deliverables will be included as a Schedule in the lease to be monitored by the lead service.

The commercial unit at Roy Smith House is currently empty and in need of fitout works. A procurement exercise to appoint a provider to complete the fit-out works is currently live. The works are anticipated to complete in Summer 2025, which is the earliest the highest scoring bidder would be able to move in to the unit and begin delivering their proposed service.

Updated response received on 13/08/25:

Discussions with the highest scoring bidder are ongoing with a view to agree heads of terms by the end of September 2025. A Procurement exercise for a contractor for fit-out works to the space was carried out between February and March 2025. During this process officers identified a pre-existing engineering issue on site, which delayed progress in the contract award until satisfactory

			resolution of this issue. Officers are now in a position to award the works contract, which once commenced is expected to last a minimum of 12-weeks.
	Share data on the number and types of roles secured through training at the Green Skills Centre, facilitated by the partnership between the Council and the College of North West London.	Director, Community Development, Children, Young	Response received on 14/04/25: We have asked the college for a response and await a return on this data. Awaiting further response.
23 April 2025 – Build Quality in Brent	Share examples that demonstrate how feedback on build quality issues has led to tangible improvements in design and processes, helping to enhance build quality in subsequent projects or schemes.	Tanveer Ghani – Director, Property & Assets, Neighbourhoods & Regeneration	Response received on 07/07/25: Officers will collate examples from different schemes where we have either self-delivered or acquired from the open market and share with RPRSC to demonstrate how feedback / lessons learned have been incorporated into future projects/schemes. A further update will be provided by 9 January 2026.
16 July 2025 – Update on Recycling in Brent	Provide an analysis of the effectiveness of current initiatives aimed at reducing textile contamination in recycling, including any lessons learned and adaptations to the approach that have been made to improve efforts.	Chris Whyte – Director, Public Realm, Neighbourhoods & Regeneration	Response received on 22/08/25: Please see attached document: Update on Recycling in Brent - Information
	Provide data on the extent to which exempt households contribute to the average monthly 14–18% of paper and card incorrectly placed in blue-lidded recycling bins instead of blue sacks.	Chris Whyte – Director, Public Realm, Neighbourhoods & Regeneration	Response received on 22/08/25: Please see attached document: Update on Recycling in Brent - Information
	Provide a detailed breakdown of recycling contamination specifically attributed to garden waste over the last year (2024/25).	Chris Whyte – Director, Public Realm, Neighbourhoods & Regeneration	Response received on 22/08/25: Please see attached document:

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			Update on Recycling in Brent - Information					
2025 – Service Scrutiny Review Recomme 2024/25 ndations update Tracker: the rec	Provide a copy of the Housing Services Complaints Management Review Findings Report for 2024/25, along with a progress update on the implementation of the recommended interventions outlined in the report.	Director, Housing Services, Resident & Housing Services	Response received on 29/08/25: The Housing Services Complaints Management Review Findings Report will be shared with the Committee and published in Autumn 2025, once it has gone through the required internal governance. A summary of the recommended interventions and progress:					
			System and data health check	Digital change project to make changes to RFC system leading to better data, records and reporting	Progress Phase 1 requirements confirmed and to soon be implemented Phase 2 has been scoped			
						Holistic complaints service	Plans for how complaints can be coordinated centrally across the service for better consistency, challenge and resident outcomes	New Teams area is live, new Head of Service role (Sept 2025) will bring more oversight and cohesion
						Decreasing use of service requests	Increasing awareness around risks of service requests, and strengthening triage	Cultural shift has started to take place and noticeable difference in volumes
			Implement audit program	Scope key quality assurance checks which can be used for case audits and how findings will be embed as part of performance management	Scoping has begun			

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Increasing quality and resolution of MEs New governance arrangements New policy and procedural documentation	Create a tool to improve consistency of complaint-led reviews and easier monitoring of actions, to become a standard part of the complaints handling process Bring key stakeholders together to explore and implement ways to improve outcomes of housing MEs Create a complaints 'line of sight' ensuring correct scrutiny and assurance at the correct levels, including the Member Responsible for Complaints Create housing specific guidance to aid staff and clarify information on	Tool has been developed and received positive feedback from Housing Ombudsman, embedding as BAU is underway In progress, improvements to case triage and follow up have begun to be implemented Line of communication open with MRC and line of sight is in draft, recruitment for resident complaints panel is underway Procedural guidance is underway, Teams channel has been set up to give staff better access to resources New housing
Website review	Ensure information on the website aligns with housing messaging and process, and meets our residents' needs	. •

Provide details on the number of	Spencer Randolph –	Response received on 29/08/25:
penalties issued under the Wates repairs contract over the past five years, specifically those related to upheld complaints in the repairs service.	Director, Housing Services, Resident & Housing Services	The legacy Wates contract has a penalty clause relating to missed appointments only (when reported to the Council). In addition, the monitoring of upheld complaints as a KPI is being commenced as part of the new contract and has not been previously formally monitored.
Provide a yearly breakdown and comparison of compensation paid by Wates for repairs over the past five years, alongside compensation paid by the council over the same period in response to complaints about Wates' service.	Spencer Randolph – Director, Housing Services, Resident & Housing Services	Response received on 29/08/25: We are currently exploring changes to the complaints system which will allow us to have a clear picture of all complaints cases where our contractors have full or partial responsibility for any failings. The system has not been set up in this way previously meaning that we are not able to confidently extract a list of Wates' complaints and the subsequent compensation (it is currently mixed in with wider Repairs Service cases compensation).
		Going forward, system changes will allow us to confidently extract data on monitor cases relating to both Mears and Wates, as well as our own internal repairs service delivery. Once this change is implemented, we will be able to easily analyse and compare data such as compensation, root causes, and outcomes, and make informed contract management and service improvements.
Provide a summary of the responsibilities and service scope for both the Wates and Mears contracts.	Spencer Randolph – Director, Housing Services, Resident & Housing Services	Response received on 29/08/25: The new Wates repairs contract (West of the borough) and the Mears repairs contract (East of the borough) have been set up identically to ensure consistent services to all residents across the borough, and to improve contract and performance management through comparison. Core responsibilities and service scope of the Contractors
		Responsive Repairs Delivery Manage all categories of repairs: Emergency, Urgent, Standard, Minor Works, and Out-of-Hours Ensure high-quality, cost-effective service with a focus on first-time fix Provide sufficient appointment slots and flexible scheduling to meet resident needs Maintain detailed records of job status, appointments, and outcomes

Appointments & Access

- Offer fixed and flexible appointment slots
- Pay compensation for missed or cancelled appointments
- Maintain access tools (keys, fobs) and follow no-access protocols

Scope of Service

- Covers 8,506 units, including 3,472 leasehold properties (communal repairs only)
- Operates on a Price Per Property (PPP) model with exclusions

Damp, Mould & Disrepair

- Comply with Awaab's Law: treat damp and mould as Category 1 hazards
- Promptly report and escalate issues to Council Surveyors
- Assist with legal claims under housing legislation

Customer Interaction

- Support Brent's Contact Centre and potentially take over call handling
- Communicate clearly with residents via texts, reminders, and real-time updates
- Obtain resident sign-off and feedback on completed works

Performance Management

- Meet Key Performance Indicators (KPIs) for repair timeliness, quality, and customer satisfaction
- Submit monthly reports and action plans for underperformance
- Participate in annual reviews and continuous improvement initiatives

Operational Requirements

Office & IT Infrastructure

- Maintain an office within 5 miles of Brent's Civic Centre
- Provide robust ICT systems for scheduling, reporting, and data sharing
- Ensure integration with Brent's systems and compliance with data governance

Health & Safety

- Comply with all statutory obligations and CDM Regulations 2015
- Provide risk assessments, method statements, and maintain safety records
- Ensure operatives are trained, equipped, and conduct work safely in occupied properties

Personnel Standards

- Staff must be DBS-checked, properly uniformed, and trained to NVQ Level 2
- Maintain a professional code of conduct and respect for residents
- Provide identification and vehicle tracking for operatives

Resident & Community Engagement

- Attend resident meetings, walkabouts, and community events
- Provide training sessions and apprenticeships for local residents
- Promote local supply chain involvement and support Brent's employment strategy

Contract Administration & Financial Controls

- Administer works via Brent's ICT systems and submit monthly invoices
- Maintain open-book accounting and participate in financial audits
- Submit business cases for price changes and adhere to PPP adjustment mechanisms

Compliance & Governance

- Adhere to Brent's policies on:
 - o Data Protection
 - Freedom of Information
 - Equality & Diversity
 - Safeguarding
 - o Complaints Handling
- Maintain confidentiality and report conflicts of interest

Provide details on	the key Spencer Randolph –	Response received on 29/08/25:				
performance indicators penalty clauses inclu Wates repairs contra Mears repairs contract.	uded in the Services, Resident & act and the Housing Services	The new Wates repairs contract (West of the borough) and the Mears repairs contract (East of the borough) have been set up identically to ensure consistent services to all residents across the borough, and to improve contract and performance management through comparison.				
		The proposed KPI measures in the contract are as follows:				
		KPI measures				
		Responsive repairs:				
		 Overall satisfaction with the repairs service Satisfaction with the last repair completed % of complaints against the Contractor which are upheld % of complaints which are escalated to Stage 2 				
		 Void repairs: % of minor voids completed within timescale (<14 calendar days) % of major voids completed within timescales (<28 calendar days) % post-inspections completed as satisfactory: void repairs Customer satisfaction with new home post-letting Average no of responsible repairs per property raised within first 3 months of tenancy 				

Planned repairs:

- Resident satisfaction with the works completed (tenants)
- Resident satisfaction with the works completed (leaseholders)
- % post-inspections at handover completed as satisfactory without defects
- Recalls within defects liability period as % homes where planned works completed
- % works completed within agreed timescale
- Cost certainty: variation of cost of completed projects against initial estimate
- No. of RIDDOR incidents
- % of complaints against the Contractor which are upheld
- % of complaints which are escalated to Stage 2

Penalty clauses

Missed Appointments Penalties

- £10 compensation to the resident for each missed appointment where the contractor arrives but outside of the appointment slot on the day
- £25 compensation if the contractor cancels an appointment within 1 working day of the scheduled time
- £100 compensation if the contractor cancels on the day of the appointment
- For communal repairs missed by the contractor, £10 is paid to the Council

Failure to Meet KPI Targets

- Contractors must meet Minimum Levels of Acceptable Performance (MLAP) for each KPI
- If a KPI falls below MLAP:
 - o Contractor must submit and implement an Improvement Plan
- Continued failure may result in:
 - o Reduction in scope of works
 - o Shortening of contract term
 - o Reallocation of properties to other contractors

Unsatisfactory Work

		If the Contractor should fail after a notice period of 5 working days to remove any defective or unsatisfactory work:
		Failure to Authorise Exclusion Repairs Payment will not be made for exclusion repairs that exceed thresholds and are not correctly authorised
		Data Protection Breaches
		Complaints Handling
		We will hold contractors accountable when their failures cause extra costs. If defective work, delays, or complaints result in rent loss, rework, or compensation, these costs will be deducted from contractor payments. Where residents are due compensation, we will recover the amount from the contractor and pass it on proportionately, so the Council does not bear the cost of their failings, where it is determined by the Councils' representative that this is an appropriate course of action.
Provide a clear overview of how the price-per-property model works in repairs, along with a five-year breakdown of the percentage of council properties that did not require any repairs each year.	Spencer Randolph – Director, Housing Services, Resident & Housing Services	Response received on 29/08/25: Overview Brent Council's new contracts for responsive repairs and voids use two pricing models: Price Per Property (PPP) and Price Per Void (PPV). These provide cost certainty, improve performance management, and focus on outcomes for residents.

Price Per Property (PPP) - Responsive Repairs

- Fixed annual price per property for day-to-day repairs.
- Covers most common repair types (plumbing, electrics, carpentry, etc.).
- Adjusted annually if housing stock changes.

Positives: Predictable costs, efficiency incentives, better resident experience.

Price Per Void (PPV) - Empty Homes

- Fixed price per property to return an empty home to lettable standard.
- Minor voids 14 days; Major voids 28 days (e.g. new kitchen, bathroom, rewire).
- Based on property archetype and works required.

Positives: Faster turnaround, reduced waiting times, cost-cutting, consistent quality.

Comparison: PPP vs PPV

	PPP – Responsive Repairs	PPV - Voids
What it covers	All routine day-to-day repairs	Works to bring empty homes up to Brent Void Standard
Pricing model	Annual price per property	Fixed price per void
Council benefit	Predictable budgets, efficiency incentives	Faster turnaround, reduced waiting list pressure
Resident benefit	Clear service standards, quicker fixes	Homes re-let to a consistent, safe standard

Overall Benefits

- Value for money paying for outcomes not jobs.
- Budget control predictable and transparent costs.
- Resident focus repairs and voids delivered to clear standards.
- Accountability contractors performance managed through KPIs.

Exclusions

It is important to note that not every type of work is included under PPP or PPV pricing. Certain specialist, high-value or compliance-driven works are excluded and are ordered separately outside of the fixed pricing model.

Examples include:

- Major structural works (e.g. subsidence, significant roofing replacement).
- Specialist compliance works (e.g. asbestos removal, fire safety upgrades, gas servicing).
- Large-scale capital improvements (e.g. full window renewal programs, new lifts).
- Works exceeding defined thresholds or requiring specialist contractors.

These exclusions ensure that PPP and PPV remain focused on everyday, routine housing management needs, while allowing the Council to separately commission major or specialist projects where appropriate.

PPP data analysis:

Financial year	Number and % of properties with					LAHS stock count	
	No rep	airs	1 or more repair		10 or more repairs		
2020- 2021	1064	14.33 %	6359	85.67 %	748	10.08 %	7423
2021- 2022	1172	14.91 %	6688	85.09 %	924	11.76 %	7860
2022- 2023	2234	25.23 %	6621	74.77 %	896	10.12 %	8855

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2024 2024- 2025	2050	% 23.72 %	6594	% 76.28 %	918	10.62 %	8644
2023-	2237	25.43	6561	74.57	854	9.71%	8798

Update on Recycling in Brent – Information Requests

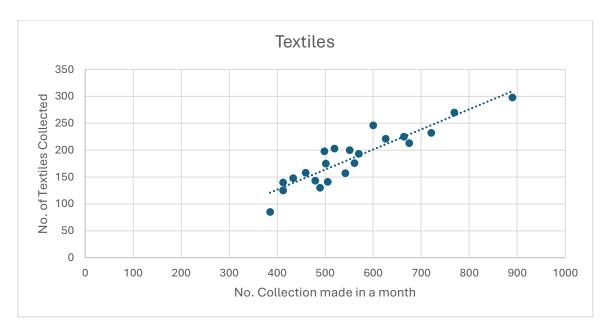
1. Provide an analysis of the effectiveness of current initiatives aimed at reducing textile contamination in recycling, including any lessons learned and adaptations to the approach that have been made to improve efforts.

The small items collection service, which collects textiles - below data shows the service and textiles increase throughout the time the service has been in place since October 2023.

From our small items collection service which commenced from October 2023 over 12,000 items have been collected. Over 33% of all items collected via this service, textiles is currently the most collected item (4,077).



The above highlights the steady increase in both the total number of collections and the number of textile collections.



The above graph shows there is close relationship between the number of textiles and total collections made in a month. This statistically proves that as more people use the service more textiles are being collected, highlighting that residents are trying to recycle their textiles through the small items collection.

In terms of reduced textiles within the prohibitive waste, when reviewing the top 5 contaminants monthly from April 2023 to June 2025, textiles has decreased but not at a significant rate as shown in the graph below.



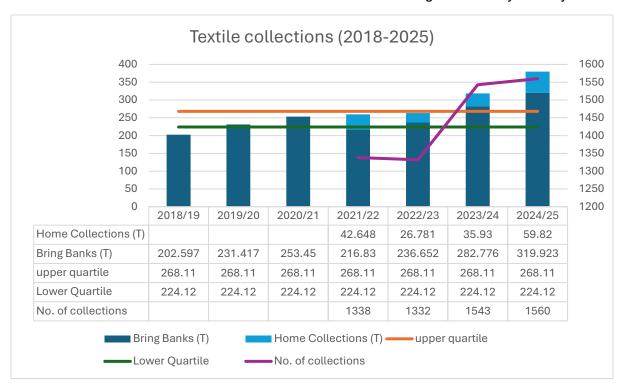
The negative correlation shown in the graph above (blue dotted line) is displaying a downward trend over a two-year period.

A 1% decrease over 2 years although not statistically significant is a modest reduction highlighting our current efforts are working to phase textiles from our prohibited waste, but at a slow pace.

One other observation on textiles contamination in the recycling bins is that it is often bedding and duvets which are difficult to recycle as there isn't a market for it. Our small items collection and textiles banks do not accept duvets. We need more movement in the industry on these items, which our communication strategies can then reflect. Our West London Waste colleagues are aware of this challenge and are exploring options for recycling of larger textile items.

Textiles monster had a paid spend behind it on social media (<u>Textile Monster ad campaign</u>) which had over 33,000 views.





From our analysis of the Bring Bank data, we can conclude that there has been a steady increase in both Bring Banks and Home Collection tonnage on annual basis. This is highlighted by a year-on-year correlation of 0.83 suggesting a high consistency rate.

Bring Banks

Through the figures for Bring Banks show a range of 117.3 tonnes as well as the upper and lower quartile not being too far apart (43.9 tonnes) highlights high consistency levels. Based on the graph above and the annual increase we should see further improvements of collection.

Home Collections

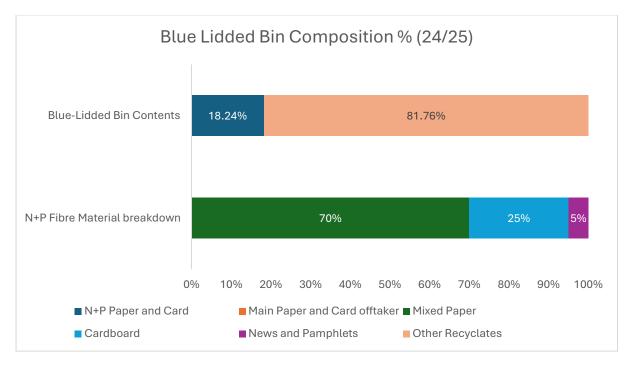
Home Collections began in April 2021. Despite the dip in service output after the launch year, the last financial year has seen a great improvement in tonnage (59.82), highlighting the positive effect of our recycling campaign and increased public engagement.

Similar to Bring Banks we can see that this service has steadily increased in terms of the number of collections made and tonnages. Although the home collection tonnage is low, the previous financial year has seen an uptake in the collection service. In the previous year home collection made up 15% of TRAID textile tonnage in 2024/25. In the above

data we can see there is a moderate correlation between collection numbers and home collection tonnage of 0.59.

2. Provide data on the extent to which exempt households contribute to the average monthly 14–18% of paper and card incorrectly placed in blue-lidded recycling bins instead of blue sacks. The point was made that there are exempt households and households that do not have the space/facilities to use the blue sack e.g. small kerbside blocks of flats.

Currently, there are 50,800 kerbside properties. 107 properties are exempt from using the paper and card blue sacks with the main reason of non-participation due to age related/ health mobility, space issues etc. Those exempted would only equate to 0.21% of the kerbside properties, suggesting that residents are abstaining from using the blue sacks for other reasons.



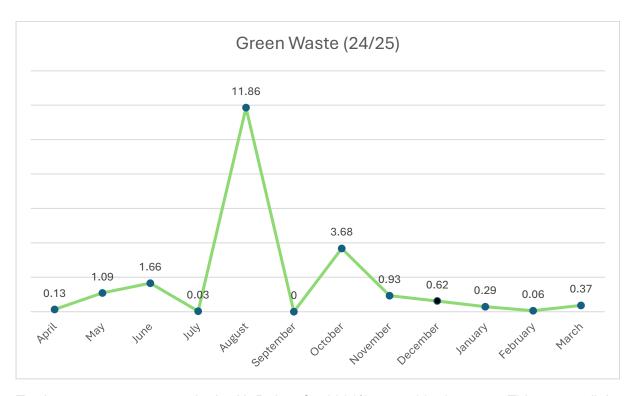
The top line of the graph (Blue-Lidded Bin Contents) displays a percentage composition of our blue lidded bin contents. As we can see 18.24% of all recycled material sent to N+P is actually paper and card. When we focus on that 18.24% we can see a further breakdown of what makes up our paper and card going to N+P.

When reviewing the data on paper and card being sent to N+P we can see newspaper and pamphlets is nominal making up on a monthly average of 5%. Cardboard accounts for a monthly average of 25%, with mixed paper making up 70%. We can deduce from this that more cardboard is placed in the blue sacks correctly. Where materials are mixed (e.g. paper and plastic bread packets, envelopes, wrapping paper with plastic coating etc.), it indicates that residents considering those materials are not sure as to where they should go, and instead of using the blue sacks end up using the blue recycling bins.

Additionally, communal recycling is still all comingled and any communal recycling that is deemed good enough quality to process is added to the same recycling from kerbside to go

to the same processor. Therefore, there are several factors contributing to the level of paper and cardboard in the recycling mix to N+P. We have a comingled contract with our recycling processor, N+P and the paper and cardboard here is still recycled and we receive a rebate for it. We will never be in a position to remove all paper and cardboard from the recycling mix to N+P due to the factors listed above. Overall, there is an indication that the levels of paper and cardboard in the blue sacks has increased and stabilised.

3. Provide a detailed breakdown of recycling contamination specifically attributed to garden waste over the last year (2024/25).



Total green waste tonnage in the N+P data for 2024/25 was 20.72 tonnes. This was a slight improvement on the contamination level as compared to the previous financial year (2023/2024) which was 24.53 tonnes. We can see a monthly average of 1.7 tonnes being found in our blue lidded recycling bins.

The sharp spike seen in August could be due to seasonality and could also be considered as an anomaly, as this was far out of normal trend. Although the tonnage in August seems high, this represents 2.54% of the total collected green waste in August 2024/2025.

