

	<p style="text-align: center;">Executive 16th January 2006</p> <p style="text-align: center;">Report from the Director of Director of Environment and Culture</p>
<p>For Action Wards Affected: ALL</p>	
<p>Draft Alterations To The London Plan: Housing Provision Target</p>	

Forward Plan Ref: E&C-05/06-044

1.0 Summary

- 1.1 This Report informs Members of the Mayor of London's proposals to alter the London Plan's new housing target for Brent, from 13,500 additional homes between 1997– 2017, to 12,700 for the period 2007– 2017 and assesses the potential implications for the Borough's planning strategy. The Report also outlines the 2004 London Housing Capacity Study from which the proposed new housing target has been derived.

2.0 Recommendations

- 2.1 That the Executive considers that the Borough's proposed new housing target has not been satisfactorily substantiated.
- 2.2 That the Executive resolves that the Council should formally object to the Draft Alterations to the London Plan, subject to further discussions with the GLA.

- 2.3 That the Executive delegates to the Director of Environment and Culture the submission of a detailed objection to the Mayor's Consultation on the Draft Alterations To The London Plan, in line with Officers comments in this report, if the outcome of further discussions in 2.2 are inconclusive.

3.0 Detail

Introduction

- 3.1 The London Plan currently seeks to ensure the provision of at least an additional 457,950 homes in London between 1997– 2016, equivalent to 23,000 per year. The Mayor is proposing that this target should be increased to 310,900 for the period 2007 – 2017, equivalent to 31,090 per year. The Council is currently required by both its Unitary Development Plan (UDP) and The London Plan to plan for the provision of at least 13,510 additional homes for the period 1997 – 2016, equivalent to 680 per year.
- 3.2 The Draft Alterations would revise this to 12,700 additional homes between 2007– 2017, equivalent to 1,270 per year; effectively representing an annual increase of 88%. This Draft Alteration target has been derived from the London Housing Capacity Study (2005) whose methodology is outlined below, together with brief Officer's comments.

2004 London Housing Capacity Study

- 3.3 The, recently published, London Housing Capacity Study (HCS) was undertaken by the Greater London Authority (GLA) with the assistance, at various stages, of Brent Planning Officers; who have most definitely not agreed to either its total potential capacity for Brent of 13,146 additional homes, nor its individual components as assessed according to the following provision sectors:

• Large sites	7,769
• Small sites	2,877
• Non self-contained	1,000
• Vacancies	1,030

These individual allocations are considered in more detail below:

Large Site Capacity

- 3.4 The HCS has identified a number of sites and areas in Brent which it considers have the collective capacity to provide 7,769 additional self contained homes developed on the basis of the location's appropriate Brent Unitary Development Plan (UDP) policies and The London Plan density range. This figure represents just over half of the original total large site capacity proposed by the GLA at the commencement of the HCS.

- 3.5 Most of this capacity is derived from specific individual sites defined as having a gross area of 0.5 hectares or more. But a proportion has also been extrapolated from unspecified potential housing development in several wider areas, publicly identified by the Council as regeneration strategy objectives, involving an element of housing, such as Wembley Town Centre, South Kilburn and Church End.

Individual Sites

- 3.6 The potential housing capacity of specific large Brent's sites was initially assessed through Brent Planning Officers' evaluation of a GLA list of 193 sites, loaded onto a dedicated GLA web site. Access to this GLA database was restricted by the GLA to specific borough officers as the entire Study has been undertaken on a 'confidential' basis, particularly in respect of individual sites to prevent premature speculative land valuation increases.
- 3.7 The GLA accepted Officers representations that the development of many of the initial HCS large site proposals would be contrary to Brent's land use strategy and UDP planning policies, particularly in respect of the protection of employment sites and areas of open space. A number of sites were clearly 'non starters', such as the playing pitch area of Wembley Stadium and the City Academy in Doyle Gardens. Others had already been developed for housing, such as the former HIRST site.
- 3.8 This initial stage of the Study resulted in the identification of 43 sites with a total capacity of 6,371 homes. However, as 15 of these sites, with a total capacity of 1,181 homes, have already been completed or will be completed before 2007 they were discounted in the next stage of the Study, leaving 28 sites with a total capacity of 5,190 homes. Officers have made representations to the GLA that a further two sites, with a capacity of 328 homes, should also be excluded as they consider that these are likely to be completed by April 2007 (the start date of the proposed target period)
- 3.9 The overwhelming majority (71%) of this provisional identified capacity of 5,190 homes on 28 sites already has planning consent for residential use; 7 sites with a total capacity of 3,692 homes (because of its size the Quintain 'New Wembley' development is methodologically assessed as 2 sites). The remaining 21 sites, with a provisional identified capacity of 1,498 homes, are of a type which Officers consider should be favourably considered, in principle, for at least a mixed use, part residential, development, in accordance with The London Plan and recent Government guidance on making better use of non-residential land to enable housing provision where appropriate.
- 3.10 Several of these sites have been subsequently granted planning permission, or approved for residential development subject to a satisfactory S106, since this part of the Study was undertaken. Officers are currently evaluating the remaining sites to identify any which might afford potential school development opportunities. Sites considered suitable for residential use, including mixed use development, will be

identified in the next stage of the preparation of the Draft Local Development Framework (LDF), Site Specific Proposals, which will statutorily replace the UDP.

Other Large Sites

- 3.11 The HCS provisionally identified a potential capacity for a further 4,120 additional homes in the general Wembley, Church End and South Kilburn areas; locations publicly identified by the Council as offering housing development opportunities. However, in doing so the GLA appear to have introduced an element of 'double counting' (specific sites in wider areas) and have also envisaged housing potential on certain sites which Officers consider would be contrary to UDP land use strategy. And so, Officers have made representations that the GLA should review this issue.

Housing Capacity Study Large Site Potential Capacity

- 3.12 The published Study has aggregated the individual sites and the 'other' categories into a single composite total of 7,769 additional homes, which is 1,541 less than their provisional capacities. This reduction appears to have been largely the product of a reappraisal of GLA assumed initial densities

Small Site Allowance

- 3.13 The identification of this potential sectoral capacity of 2,877 additional homes was undertaken directly by GLA officers who used the London Development Data Base (LDD) to identify housing development trends on sites of under 0.5 hectares in recent years. Many of these sites would have been 'windfall' developments (i.e.) not UDP designated housing proposals. The GLA extrapolated future potential housing development by assuming a further increase in recent permitted density.
- 3.14 However, Officers are concerned that the GLA has overestimated the potential density increase factor by understating the recent Borough development density trend. Officers have informed the GLA that the density figure of 58 dwellings per hectare used in the HCS (see its Annex 8) to extrapolate Brent's small site capacity does not properly reflect the actual housing development density in recent years.
- 3.15 Officers have specifically noted that this HCS density figure is significantly lower than the figure of 71 dwellings per hectare which is given for Brent in the Mayor's Draft Sub Regional Development Framework For West London, which was also published at approximately the same time as the HCS. Officers further note with concern that the provisional small sites capacity of 2,560 homes has been increased by 317 without any explanation.

Non Self-Contained Homes

- 3.16 The HCS has identified a potential sectoral capacity of 1,000 non self contained homes. This non self-contained sector covers a very wide range of accommodation from bed sits in subdivided houses to purpose built student and hospital staff residences. GLA officers originally extrapolated, from LDD data base records, that this sector had a potential capacity of 2,300 additional homes.
- 3.17 However, this was subsequently reduced to 1,000 following strong Officers representations that the historic development trend had been distorted by recent large student and hospital accommodation schemes which are unlikely to be repeated. Brent officers are currently undertaking a detailed scrutiny of the robustness of this sectoral target.

Vacant Homes;

- 3.18 This has been a particularly contentious sector, particularly as the GLA arbitrarily changed the basic assessment methodology in the course of the Study, from estimated reoccupation trends to a proportion of Council Tax identified vacant premises. Brent was originally allocated a target to bring back 1,500 vacant homes into occupation. However, following Officers' strong representations that the GLA had employed out of date Council Tax records, this figure was reduced to 1,030; a reduction which is reflected in the revised Draft Alteration's overall target of 12,700 additional homes.
- 3.19 Officers are undertaking further research to establish the justification for the vacancies target. Furthermore, Officers conceptually question whether a Housing Capacity Study, which is predicated on the statutory planning system, should embody a vacant homes element as the reoccupation of vacant buildings, which already have an authorised residential use, normally occurs without any further planning intervention.

Use of London Housing Capacity Study In The Draft London Plan Alterations

- 3.20 As the foregoing has indicated, Officers have significant reservations about key aspects of the Study's methodology and proposed sectoral targets.
- 3.21 A further problem is that a housing capacity figure was calculated from individual site assessments arriving at a grand total or potential capacity. Subsequent testing has shown that this level of housing development will require, in particular, new school sites. This means that Brent will need to have a lower capacity because some housing land will need to be given over to school sites. It is also likely that housing growth will need to be constrained by the availability of school sites and the time needed to deliver school expansion. In other words a high housing target will deliver housing faster than our ability to

provide the infrastructure for it, placing significant financial burdens on the council.

- 3.22 Your officers fully accept a significant increase in Brent's housing provision target but changes to that target should be made in the round considering the infrastructural problems that such a revised target creates.

Progressing The Draft London Plan Alterations And Their Implications For Brent

- 3.23 The Draft Alterations: Housing Provision Targets have been placed on statutory consultation for the period 17/10/05 to 20/1/05. Representations will be considered by an Examination in Public (EIP), which has been, provisionally, scheduled for June 2006. Accordingly, it is important that the Council makes any formal representations now. The Mayor, unlike the boroughs within the LDF plan making process, is not statutorily required to accept the EIP's report and recommendations as to whether or not the proposed housing targets for each borough should be incorporated into The London Plan.

- 3.24 The Mayor will look to boroughs to include proposed new London Plan housing targets in borough's draft LDFs, citing the need for 'general conformity' with the London Plan, and will formally object to any lower new housing targets. Boroughs would then have to persuade their own LDF Inquiry why the Mayor's target is unsatisfactory. Should an LDF Inquiry Inspector agree with a borough's stance, the Mayor could still ask the Secretary of State to intervene and direct amendment to incorporate the Mayor's target.

- 3.25 If the Borough accepts the Mayor's proposed new housing target by incorporating it into its LDF, this will mean that Brent' will have to plan for and identify sufficient sites to enable the provision of:

- 12,700 additional homes, the sixth highest London borough target and the :
- highest borough target in West London; one third of the sub regional target
- 1,065 additional self contained homes annually; compared to the recent average completions of 542 per year (1997 - 2003) with highest output of 912 (2001)
- 103 vacant homes to be reoccupied annually; the fourth highest London borough target (eleven boroughs have no vacancy target)

- 3.26 These would be very challenging statutory targets. Failure to consistently meet the annual total target could result in developers arguing that the Council should make available additional sites for housing, which the Council may wish to retain for other greater priority uses.

- 3.27 In this context, it should be noted that only about half of the sites identified in the previous London Housing Capacity Study (2000), and designated for housing in the UDP, have actually been developed as house builders have found it more financially attractive to press for housing development on other non-designated sites, particularly Local Employment Sites.

The Housing Capacity Study, Draft Alterations and Opportunity Housing Borough Status

- 3.28 The Council indicated in its Opportunity Housing Borough submission to the ODPM in 2005 that Brent has a potential capacity to provide about 12,000 additional homes. At first sight, this figure appears not very dissimilar to the 12,700 proposed in the Draft Alterations. But this would be a very superficial impression as the respective figures have been derived from very different methodologies.
- 3.29 Whereas the Housing Capacity Study is based on site specific evaluations and trend extrapolations, Opportunity Borough employed a much broader brush indicative methodology, identifying potential housing opportunities on a much wider area basis. It did not consider how that capacity would be constrained by the need for infrastructure such as schools.
- 3.30 As already noted, the Draft Alterations if adopted in their current form would impose targets which the Council would need to incorporate within its own LDF. Failure to meet these could generate potential significant consequences for the Council's planning strategy and ability to ensure that new housing is sustainably developed without detriment to other priority land uses and existing amenities.

4.0 Financial Implications

- 4.1 The need to pursue objections to an Examination will place an additional burden on the resources of the Planning Service. Also, the potential need to plan for and deliver an additional 12,700 homes would have substantial resource implications for the Planning and Housing Services. The scale of the proposed additional housing would also have significant resource implications for other Council services, particularly the need for additional educational facilities.

5.0 Legal Implications

- 5.1 The Draft Alterations if incorporated into The London Plan would become part of the Borough's statutory development plan framework, which consists of The London Plan and the Council's development plan (i.e. at the moment the UDP but in due course the LDF). The Council's LDF is required to be in 'general conformity' with The London Plan. A borough's land use strategy and planning policies which are not in 'general conformity' with The London Plan would almost certainly be formally opposed by the Mayor at every level from a Local Inquiry to a request for intervention by the Secretary of State.

6.0 Diversity Implications

- 6.1 The proposed level of additional housing would probably generate increased affordable housing provision, which would be of particular benefit to those with unsatisfactory housing; among whom ethnic minorities are overrepresented.

7.0 Staffing Implications

- 7.1 The need to pursue the objections to an Examination will place an additional burden upon staff resources in the Planning Service.

8.0 Environmental Implications

- 6.1 The proposed level of additional housing may exceed the Borough's ability to ensure the sustainability of all new housing development and thereby have detrimental implications for Brent's environmental quality.

9.0 Conclusions

- 9.1 Officers consider that the London Housing Capacity Study is not robust enough to provide an acceptable basis for the Draft Alterations To The London Plan; Housing Provision Targets. This initial view was supported by the Planning Committee (16/11/05) who recommended that the Executive, on behalf of the Council, should formally object to the Draft Alterations.
- 9.2 Officers are undertaking a detailed examination of the Study's sectoral outputs and are exploring the possibility, with other boroughs in London which share Brent's concerns, of producing a 'consensual critique' of the Study which could be submitted to an Examination in Public to complement individual borough submissions should Members wish to object to the Alterations.

- 9.3 Officers recognise that the Borough certainly has the capacity to substantially increase its current annual target of 680 additional homes, as indicated in Brent's designation as a Housing Opportunity Borough, but are not yet satisfied that the proposed additional 12,700 homes could be sustainably delivered between 2007– 2017 given current and projected Borough infrastructure constraints. It is proposed that objections to the London Plan Alterations should stand unless officers can resolve the issue in forthcoming discussions.

10.0 Background Papers

- 10.1 2004 London Housing Capacity Study (GLA, 2005)
Draft Alterations To The London Plan: Housing Provision Targets (GLA, 2005)
- 10.2 Any person wishing to inspect the above papers should contact Michael Maguire, The Planning Service, Brent House, 349 High Road, Wembley, Middlesex HA9 6BZ, Tel: 0208 937 5310

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