



## **Empty Properties Strategy Task Group**

**Final report  
January 2006**

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**Cllr William Dromey  
Chair of the Task Group**

**Foreword by  
Chair of the Task Group  
Cllr William Dromey**

In establishing this task group, we sought to achieve a true picture of the empty properties issue in Brent and assess the Council's approach to it. In doing so, we wanted foremost to ensure that such properties become homes as soon as possible.

Focused on private sector properties, the task group set out to identify obstacles for developers and the problems experienced by those assisting re-use. A key concern was the often complex and unique circumstance that lay behind the "empty" classification. The task group envisaged a "person based" approach, reactive and sensitive to individual need.

A high and increasing number of empty properties across London and within Brent motivated this investigation. In determining its facts and figures, the task group identified areas in which the council could improve its co-ordination in tackling this issue.

Empty properties are empty homes. They also have the potential to blight local communities and attract an array of social problems. They represent an opportunity for the Council to support safer neighbourhoods and help people take pride in where they live.

As Chair of the task Group I hope its agreed recommendations will be taken forward and that its findings help inform future policy.

**Task Group Membership**

The Task Group consisted of the following members:

- Cllr Dromey (**Chair**)
- Cllr Irwin Van Colle
- Cllr Janice Long
- Cllr William Duffin
- Cllr Richard Harrod
- Cllr Mrs N Blackman

## **Executive Summary**

The Empty Properties Task Group investigated methods of “turning empty properties into homes”, aiming to help Brent’s homeless and discover current obstacles to re-use. It sought to identify those problems experienced within the private sector by developers of empty properties.

The Task Group focused its investigation on empty properties within the private sector, excluding those owned by Registered Social Landlords (RSLs) and the Local Authority.

There is no widely accepted definition of an empty property. Empty properties have unique histories, with a variety of circumstances surrounding their status.

Brent has used a grants based approach to bringing empty homes back into use. This has made a direct contribution to neighbourhood regeneration, environmental priorities, and homelessness. The Housing Act 2004 provides a new discretionary power for local authorities to take over the management of long-term privately owned empty properties

Brent has approximately 91,900 private dwellings within the borough boundary. Approximately 3155 of these are empty. In 2003/04, Brent Council helped return 874 private sector vacant dwellings into use through grants, enforcement, advice, planning powers, private sector leasing and deposit guarantee schemes.

The Task Group collected evidence from internal and external partners, RSLs, regional bodies, and the Empty Homes Agency.

### **Recommendations**

1. The Council should conduct two pilot surveys to provide greater detail of the empty properties situation in Brent.
2. That a separate leaflet be included within annual council tax bills explaining the empty property grants scheme.
3. That the Council make use of Compulsory Purchase Orders in cases where other attempts to encourage re-usage have failed, and in those cases which are seriously detrimental to the amenities of the neighbourhood. Capital funding should be made available upon requested to support this process.
4. Wherever possible, the Environmental Health Team, the Empty Property Team, and Adult Social Care should look at ways of working more closely in partnership with one another to address the empty properties issue. The Empty Properties Strategy should be formally re-written to reflect such closer working and greater use of “case conferences” should be encouraged.
5. Embed a person led, rather than property led approach.
6. Initiate a comprehensive questionnaire for landlords and owners, which will help us, understand why properties are empty, for how long, and what could persuade effective returns to use.
7. Investigate and develop a programme of incentives to compliment the current grants scheme.

A list of full recommendations is detailed on page 14.

## **Introduction**

The Empty Properties Task Group investigated methods of “turning empty properties into homes”; aiming to help Brent’s homeless, discover current obstacles to re-use, and address the need for affordable housing. It sought to identify those problems experienced within the private sector by developers of empty properties.

Locating empty properties within the Borough served to identify local geographical trends, which could be considered alongside national best practice. An electronic mapping exercise contributed at an assessment of the triggers and incentives for development.

The Task Group agreed to focus its investigation on empty properties within the private sector, excluding those owned by Registered Social Landlords (RSLs) and the Local Authority.

The Task Group collected evidence from internal and external partners, representatives from the planning service, environmental health, the Council’s direct lease section, RSLs and regional partners. Property developers contributed to an understanding of the problems facing the sector, with case studies illustrating the varied reasons for vacancy and those methods employed to tackle them. A national body, the Empty Homes Agency, also supported the investigation.

## **Context**

### ***What is an empty property?***

There is no widely accepted definition of an empty property. ODPM guidance, however, determines empty properties as those that<sup>1</sup>:

- Have been unoccupied for six months or over.
- Are “special cases”, unoccupied for less than six months. Such as those subject to legal action for disrepair.
- Are occupied but have potential for more beneficial use.
- Will not be brought back into use by the owner working alone.

Properties that appear empty can include second homes, commercial storage areas, and those awaiting planning consent or forming part of a regeneration area.

Properties can remain empty due to the reluctance of private owners to procure tenants, for business and financial reasons, and a variety of personal circumstance, including imprisonment and long-term residential care.

Properties remain empty for a variety of complex, and often unique, reasons. Some owners may be caught in an “asset rich, cash poor” situation which hinders their ability to return the property to use.

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<sup>1</sup> “Empty Property: Unlocking the potential” An implementation handbook, ODPM, May 2003.

### ***Why do empty properties matter?***

The Task group's principal objective was to identify properties that are empty and can be turned into homes to help address rising levels of homelessness and the need for affordable housing.

There are also implications for the level of payable council tax or rates, the assessment of local planning applications, and eligibility for financial improvement grants.

Empty properties can contribute to the positive regeneration of local communities and help tackle associated environmental problems. Such properties are often vulnerable to vandalism, risk dereliction, and can impact upon local business turnovers and community well being. Often attracting vandalism, fly-tipping and other forms of anti-social behaviour, they can blight house values and create an impression of decline.

It is important to ensure the Council strikes a balance between a reactive and proactive approach, able to address long term properties that require more intense redevelopment and those which are considered quick fixes (i.e. easily returned to use).

### ***What is the local picture?***

Brent has used a grants based approach to bringing empty homes back into use. This has made a direct contribution to neighbourhood regeneration, environmental priorities, and homelessness. It is an approach that tailors national measures to local circumstance.

Statistically, empty properties in the public sector constitute a small proportion of single units within Brent and few higher demand family sized properties. In addition, privately owned empty properties are frequently those in the poorest physical condition. The Council has a significant role in enabling redevelopment, enforcing return to usage, and regulating properties in the private sector.

Brent has approximately 91,900 private dwellings within the borough boundary. Approximately 3155 of these are vacant, with 2722 being vacant for more than a six month period (refer to the table on page 8).

In 2003/04, Brent Council helped return 874 private sector vacant dwellings into use through grants, enforcement, advice, planning powers, private sector leasing and deposit guarantee schemes. This exceeded the target of 730. The target for the next three years is 670 properties per year. This forms part of Brent's Public Service Agreement in which Brent has agreed to create 115 new housing units each year for three years as a result of empty properties brought back into use via grants to landlords and securing nomination rights to households in need. In return, Brent will receive £136,000 pump priming and £597,610 as a reward for reaching the stretched target.

Trends indicate that Brent has some of the worst housing conditions in the country, and needs at least 3,386 new affordable homes annually. The

Council has committed to providing 13,510 extra homes between 1997-2016. The Council has been making steady progress on its annual targets to achieve this commitment through the Empty Property Strategy. Results indicate that Brent is currently successful in returning approximately 140 properties to use.

Brent's Unitary Development Plan, however, outlines that it is getting harder to generate affordable housing: *"Whilst, in previous years, providers of affordable housing have been successful in securing larger sites at a period of depression in the housing market; this period has come to an end & larger sites seem to be in increasingly short supply"*. Difficulties in generating affordable housing have been exacerbated by 'Right to Buy' social rental stock loss; the implications of the Borough's Estates Regeneration Programme; and the Government's 'Decent Homes by 2010' Improvement Strategy.

Empty properties are identified through council tax records, the Council's house condition survey and via referrals from residents, councillors and developers. There are approximately 3155 properties classed as "empty". 2323 of these are privately owned.

The **Map in Appendix 1** indicates the number of empty properties in Brent, within the private sector. Properties are clustered in relation to density, including ward boundaries. Street specific references are not provided to ensure compliance with data protection.

**Appendix 2** gives a break down of figures, arranged by category of exemption or discount.

### ***What is the National Picture?***

The Government has outlined the following objectives<sup>2</sup>:

- To ease pressure on the housing stock in areas of high demand and reduce the necessity to develop on green field land.
- To reduce blight and opportunities for petty crime and anti-social behaviour.

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<sup>2</sup> ODPM, "Housing" section of [www.odpm.gov.uk](http://www.odpm.gov.uk)

## Housing Investment Programme Data 2004

2004	Total Number of Empty Homes	Ownership of Empty Homes			
		Local Authority	RSL	Other public	Other private
North East	39,957	6,803	3,091	410	29,293
Yorkshire & Humberside	84,224	9,814	3,822	219	70,369
East Midlands	58,192	4,966	2,125	1,053	50,048
Eastern Region	59,467	4,209	1,898	1,036	52,324
<b>London</b>	<b>99,047</b>	<b>8,952</b>	<b>5,960</b>	<b>924</b>	<b>83,211</b>
South East	83,371	3,035	3,480	1,577	75,279
South West	62,475	2,259	2,032	536	57,648
West Midlands	75,829	6,880	5,900	170	62,879
North West	127,473	10,618	10,887	1,450	104,518
<b>ENGLAND TOTAL</b>	<b>689,675</b>	<b>57,536</b>	<b>39,195</b>	<b>7,375</b>	<b>585,569</b>

Raw data *Regional and England grossed totals* - Total vacant dwellings at 1 April 2004. Source: The Empty Homes Agency, April 2004.

Housing Strategy Statistical Appendix (HSSA) further detail can be found at:

[http://www.odpm.gov.uk/stellent/groups/odpm\\_control/documents/contentservertemplate/odpm\\_index.hcst?n=1092&l=4](http://www.odpm.gov.uk/stellent/groups/odpm_control/documents/contentservertemplate/odpm_index.hcst?n=1092&l=4)

**Best Value Performance Indicator 64** relates to the number of empty dwellings returned to use and is a critical indicator in the Council's Local Performance Plan. This is a national measure which is designed to address the constant new demand from priority homeless people.

### ***The Legislative context***

The Housing Act 2004<sup>3</sup> provides a new discretionary power for local authorities to take over the management of long-term privately owned empty properties.

The legislation acts in parallel with existing measures for securing the occupation of empty homes. The Act strengthens existing provisions for voluntary leasing (operated by Local Housing Authorities and Registered Social Landlords) and offers alternatives to enforcement action.

The Act makes provision for **Empty Homes Management Orders** which provide local authorities with powers to act in the event of owner resistance. If home improvement grants are rejected without a good reason for the property remaining empty, the local authority can nominate itself to manage the property for a fixed period, undertake any necessary improvement work, and reuse the property to tackle cross-tenure demand.

The review of the Empty Properties Strategy aimed to adapt to market place changes, continued growth and demand for affordable housing, and the legislative changes under the Housing Act 2004. The Task Group sought to improve ways of matching increased demand for homes with usage of empty properties.

### **Addressing the Problem: Tools and Good Practice**

Brent's Empty Property Strategy (EPS) is a key component of the Council's Housing Strategy. The Council is currently reviewing the EPS, first introduced in 1996 to ensure that it continued relevance and effectiveness. The Task group, therefore, seeks to inform his review through its final recommendations and future monitoring.

There are a substantial number of privately owned empty properties in the borough, a wasted resource for the owner and the community.

Brent's EPS recognises the need for good quality, affordable, accommodation for all Brent residents, across all tenures, providing advice and initiatives to encourage owners to convert empty properties into valuable assets.

Brent's EPS is a high priority. The objectives of the strategy are:

- To maintain a good working relationship with internal and external partners to sustain and develop initiatives to turn empty properties into homes.
- To develop initiatives to prevent properties becoming empty.
- To provide an example to owners and landlords in the private sector of good quality efficient management practices in social housing.

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<sup>3</sup> The Housing Act 2004 received Royal Assent on Thursday 18 November 2004.



- To maximise all resources (funding, advice, planning powers and enforcement action) to turn empty properties into homes.
- To encourage involvement of the whole community through an effective communication strategy and sharing of information.

### **Grants**

Council Grants assist private owners or developers in refurbishing empty properties for re-use, in return for nomination rights over a given period (usually 5 years). A Grant will make a significant contribution to the cost of improvements and provide a managed income for property owners over the duration. After the Grant aid period, the owner gains from an improved property for private lease.

This can involve offering incentives ranging from grants to advice on sale, leasing and tax issues. Incentives are dependent on good will and co-operation. Where it is not forthcoming local authorities may resort to enforcement action.

Currently the level of grant is £3000 + 60% of the remaining eligible expenses, with five year nomination rights. This programme constituted £2.5M in 2004/5. The PSA target set a goal of 115 new units. It is estimated that for every £1 spent on returning an empty property to use, £1.50 is saved as a result.

The grants regime in Brent is highly successful and returns approximately 140 properties a year to use. The Council's approach is focused on "new homes", the grant allocation is fully spent and demand regularly exceeds capacity.

The Council's website provides guidance for those interested in exploring the Grant route for empty properties appears.

### **Compulsory Purchase Orders (CPO) and Enforced sale**

The Government introduced measures for Compulsory Purchase and Enforced sale to<sup>4</sup> a) complement voluntary leasing arrangements and existing enforcement powers; and b) bring dilapidated empty homes back into use that do not require owners to fund renovation from their own resources.

A CPO is an order that permits an authority to take ownership of privately owned property for residential purposes. They are intended as a last resort, following the failure of other initiatives.

However, making an adequate and justified case for a CPO can be difficult. The case needs to be strong and fully justify. The Council will need to prove: that the owner has no intentions to improve the property; that the acquisition is fair; and that it does not contravene human rights laws. This can be a lengthy and difficult process for the Council.

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<sup>4</sup> Empty Homes: Temporary Management, Lasting solutions: A consultation paper, May 2003, P24.

## **Key Findings**

The Task group findings are set out below ordered in accordance with the Empty Property Charter of the EHA (Empty Homes Agency).

### **1) Commitment to tackle empty property**

Brent has a history of commitment to tackling empty properties within the Borough. The Empty Properties Strategy within the housing strategy has set out challenging targets for returning properties to use. Such targets are extended each year.

The amount of effort, money, and time spent on encouraging landlords to deal with empty properties has been substantially increased over the past 4 years, in order to minimise numbers of priority homeless people living in bed & breakfast hotel accommodation. Not only is such hotel accommodation an unsatisfactory arrangement from the individual's point of view, it also costs the Council many thousands of pounds because of the shortfall between the Housing Benefit subsidy and the rents that are charged.

An exercise matching Controlled Parking Zone Permits with registered empty properties was requested by the task group. The exercise revealed that approximately 5 of all empty properties (including RSL/LA) had a current permit. It was noted that due to the separate histories of each empty property, caution should be exercised in applying such statistics.

Unoccupied property exemptions are not granted routinely and are considered on a case by case basis.

The classification and level of current exemptions is detailed in Table 1.

### **2) Clear methods of reporting.**

Brent provides good contact points for those wishing to report empty properties and for those seeking to bring them back into use. This helps to ensure that an accurate picture of such properties is achieved and that resources can be more effectively targeted to encourage return to use.

A London wide reporting system exists through the Empty Homes Agency's Hotline, funded by the Housing Corporation (London Region). This is especially useful to encourage cross working across boroughs and in circumstance where ownership occurs across boundaries.

The Empty Homes Agency found that 80% of their calls were from owners asking for advice about their empty homes.

### **3) Dedicated empty property officer.**

Brent has excellent empty properties officers and a dedicated team to address the issue. The focus of its work is to effectively buy nomination rights for the homeless and social housing.

Grants are available to landlords to convert or restore empty properties to residential use. Grants are conditional upon the owner allowing the Council to nominate the priority homeless tenant households, who are currently in Bed & Breakfast hotel accommodation, for 5 years after completion of the works. This is achieved by them leasing the properties through the Brent Direct Leasing Scheme (managed by Brent Housing Partnership) or a Housing Association. Grants are limited to £6,500 per person that the proposed unit(s) of accommodation can accommodate..

**3) Private Housing.** Brent has a comprehensive private housing assistance policy with the flexibility to offer grants to owners of empty property. Local authorities now have now been given more flexibility and can offer low rate loans as well as grants.

#### **4) Publicity and Communication**

A creative approach to publicity provides greater awareness of “carrots and sticks” for empty property owners. Owners need to know their options and equally be aware of the consequences of inaction.

Brent could take a more robust approach in highlighting the potential enforcement action it can take. Whilst loans and grants are well publicised this needs to be balanced with better promotion of the “sticks” at the Council’s disposal (i.e. Compulsory Purchase Orders).

A dedicated website has been suggested, developed in partnership with 7 west London boroughs, to raise profile and to assist in the co-ordination of resources.

#### **5) Pilot Survey**

Regular surveys of empty property owners allow for an accurate picture of the problem to be attained. A GIS (Geographic Information Systems) mapping exercise was requested by the task group to identify the location of empty properties in Brent and is included within this report.

While more empty properties are situated in the south of the borough, the north contains more high demand “family sized” accommodation. More research is required to understand the nature of empty property trends.

**Hammersmith and Fulham** undertook a survey of empty property owners in their borough to assess whether owners wanted help to bring their problem properties back into use, and with whom they would prefer to work. The results of the survey challenged their assumptions regarding owners and the tools they use to support them. They found that most respondents had bought or acquired their property already “empty” (only 9% inherited their property). They either intended to live in it themselves, use for family or friends, use it as an investment, or manage the property themselves. Only about a quarter of respondents were interested in some form of assistance to bring their empty property back into use. The rest of the respondents either didn’t want to work with the council or were unwilling to do anything with their property.

## **6) Private sector leasing scheme**

Brent has a very successful private sector leasing scheme in operation.

Through which private sector landlords provide housing for the homeless on a temporary leasing scheme. These are normally for three years and managed by Registered Social Landlords (RSLs) on behalf of the council.

## **7) A Joint multi-agency approach**

Whilst positive relationships exist between concerned partners, more could be done to “join-up” services. This is particularly important in light of the Council’s reorganisation and the restructuring of education and social services.

Successful authorities do not attempt to carry out their empty property work on their own.

## **8) Private sector enforcement**

The Task Group considered that while Brent has an effective Grants regime, the use of Compulsory Purchase Orders could send out a firm message that it is serious about tackling empty properties. Such measures should be used as “last resort measures” and be directed at properties that are eye sores.

As the CPO process is complex it relies on dedicated resources and focused expertise. Brent currently lacks the capacity to undertake such work. The Task Group were keen to explore partnering opportunities with other London Boroughs.

Whilst a grants based approach has proven effective in Brent it could be strengthened by more visible “last resort” measures.

**London Borough of Newham** is actively engaged in CPO's and has outlined a number of benefits from the CPO process:

- Bringing about the lawful use of empty commercial space and inappropriately or unused retail premises so as to encourage a vibrant town/centre/shopping precinct.
- Recovering unpaid Council Tax and other corporate debts that have accrued through the years and that the Council has been unable to collect by other means.
- Improving the ‘streetscene’ in Newham by the removal of eyesores thereby tackling vacant buildings/land problems relating to the dumping of rubbish, vandalism and arson, squatting, drug taking and increased rodent activity.
- Reducing service complaints to the Council (empty properties attract a disproportionate number of complaints from members of the public).
- Increase the availability of good quality private sector accommodation for purchase or rent.
- Reducing the number of privately owned dwellings classified as ‘unfit for habitation’ (under Section 604 Housing Act 1985).
- Encouraging private sector finance spend by forcing the refurbishment of vacant properties.

**The City of Westminster** has outlined similar benefits from CPO's, including the permanent regeneration of an area (due to abandoned areas becoming 'repopulated' with people and community life), and the capacity to generate housing in areas where there is inadequate available land for new housing development.

### **9) Redraft/review of strategy**

A review and update Brent's Empty Property Strategy (EPS), as a component of the Council's Housing Strategy, would help to ensure continued relevance and effectiveness. Build on the work of the task group his review through its final recommendations and future monitoring.

Following on from its investigation and key findings, the task group determined the following recommendations:

#### **Recommendations**

1. The Council should conduct two pilot surveys to provide greater detail of the empty properties situation in Brent. The Pilot should include one ward from the North and one from the South respectively. The Task group propose that this exercise takes place in Willesden Green and Sudbury.
2. That a separate leaflet be included within annual council tax bills explaining the empty property grants scheme, guaranteed rental income, and highlighting potential. Further advertising through the Brent Magazine and internet should complement this.
3. That the Council make use of Compulsory Purchase Orders in cases where other attempts to encourage re-usage have failed, and in those cases which are seriously detrimental to the amenities of the neighbourhood. Capital funding should be made available upon requested to support this process.
4. Wherever possible, the Environmental Health Team, the Empty Property Team, and Adult Social Care should look at ways of working more closely in partnership with one another to address the empty properties issue. The Empty Properties Strategy should be formally re-written to reflect such closer working and greater use of "case conferences" should be encouraged.
5. Embed a person led, rather than property led approach. Tailor solutions to the needs of owners, giving consideration to the complex situations and circumstance behind empty property cases.
6. Initiate a comprehensive questionnaire for landlords and owners, which will help us, understand why properties are empty, for how long, and what could persuade effective returns to use. Use best practice from neighbouring local authorities.
7. Investigate and develop a programme of incentives to compliment the current grants scheme. Look at a range of packages which will further support a "return to use" for social housing.

## References:

The following documents were used in the preparation of this report:

- Empty Property: Unlocking the potential: A case for action, ODPM, 2002.
- Empty Homes Toolkit, Empty Homes Agency, 2002.
- Empty Properties Strategy: Turn empties into home, London Borough of Brent, June 2003.
- Empty Homes: Temporary Management, lasting solutions: A Consultation Paper, ODPM, 2003.
- Empty property: Unlocking the potential, An implementation handbook, ODPM, 2003
- Empty Properties Case Study, Private Housing Services, Brent Council, 2004.
- Enforcement on Empty Properties, Chartered Institute of Environmental Health, 2004.
- Unlocking the potential of London's Empty Homes, The Empty Homes Agency, 2004.

The Government's response to the ODPM: Housing, planning, local government and the regions select committee's eight report on empty homes and low demand pathfinders, Cm6651, HOC, 2005.

Other sources:

- Case studies material, Brent Council
- Partner presentations
- Summary of guidance for empty properties in Brent from [www.brent.gov.uk](http://www.brent.gov.uk)

The task group received presentations from:

- Steve Wilson ,Head of Private Housing Services, Brent Council
- Jonathan Ellis, Chief Executive, Empty Homes Agency
- Elaine Sanders, Business Manager, Pathmeads Housing Association

## Appendix 1

**MAP**

Table One

- Detail of ALL Empty Properties, broken down by *Classification* of exemption and by *Discounts*.

		ALL Empty Properties	> 6 Months	Note: This list includes Registered State Landlord (RSL) properties	
Exemptions					Explanations
Class	A	251	171		A - Require or are undergoing major repair or undergoing structural alteration (exemption allowed for up to one year only or 6 months from completion of the works, whichever the sooner)
Class	B	76	1		B - Are owned by a charity (exemption allowed for up to six months only)
Class	C	191	5		C - Are unfurnished (exemption allowed for up to six months only)
Class	D	7	7		D - Are left empty by someone who has gone to prison
Class	E	54	50		E/I - Are left empty by someone who has moved to receive personal care in a hospital or a home, or elsewhere
Class	F	325	241		F - Are waiting for probate or letters of administration to be granted (exemption continues for up to six months after being granted).
Class	G	1	1		G - Are empty because occupation is forbidden by law
Class	H	4	4		H - Are waiting to be occupied by a minister of religion
Class	I	5	3		E/I - Are left empty by someone who has moved to receive personal care in a hospital or a home, or elsewhere
Class	J	2	2		J - Are left empty by someone who has moved out to provide personal care to another person
Class	K	4	3		K - Are owned by a student and were last occupied by that student



Class	L	14	13		L - Have been repossessed
Class	Q	1	1		Q - Are the responsibility of a bankrupt's trustee
<b>Discounts</b>					
PCLA		13	13	* PH to confirm if all are > 6 months	PCLA - Require or are undergoing major repair or undergoing structural alteration (exemption allowed for up to one year only or 6 months from completion of the works, whichever the sooner)
PCLB		621	621	* PH to confirm if all are > 6 months otherwise 596	PCLB - Are owned by a charity
PCLC		1586	1586	* PH to confirm if all are > 6 months otherwise 1065	PCLC - Are unfurnished
<b>TOTALS</b>		<b>3155</b>	<b>2722</b>		

Table Two

- Detail of Private Empty properties over 6 months, by the same categories.

Empties Properties over 6 months							
Exemption Class	Private	HA	Council				
CLASS A	136	32		<b>Key</b> Ownership defined through Property database Maintenance Description Z Private Q, QA ans QB Housing Associations C Council			
CLASS B	1						
CLASS C	4	1					
CLASS D	3	4					
CLASS E	48	2					
CLASS F	225	15	1				
CLASS G	1						
CLASS H	4						
CLASS I	3						
CLASS J	2						
CLASS K	3						
CLASS L	11	2					
CLASS Q	1						
Discounts							
Discount Type	Private	HA	Council	C&F	E&C	BH	TMO
PCLA	13						
PCLB	568	13	1	2		2	
PCLC	1314	175	16	6	4	1	1

**Key**

C&F Children and Families  
E&C Environment and Culture  
BH Brent Health Authority  
TMO Tenants Management Organisation