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To: BRENT Reg19: 6.2 Housing
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Date:

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(1) Vacant Building Credit

The Draft New London Plan says:

H9 (A): The Vacant Building Credit is unlikely to bring forward additional development in London, therefore in most circumstances, its application will not be appropriate in London. However, there may be some limited circumstances where the credit would, in line with the intention of the credit, provide an incentive for development on sites containing vacant buildings that would not otherwise come forward for development.

The Panel wants to strike out all of H9:

236. Policy H9, in encouraging boroughs to disregard the Vacant Building Credit ("VBC") except in limited circumstances, would be contrary to national policy. The justification for the approach taken is the significant housing need, including affordable housing need and past rates of delivery without VBC, indicating that brownfield land would come forward for development in the absence of this incentive. Whilst the need for affordable housing is acute and the potential impact of the VBC significant, these circumstances are likely to apply to most large urban areas. Further, we find that there is insufficient evidence of the impact of disapplication of the VBC across London as a whole to justify a departure from national policy. If boroughs wish to disapply the VBC, they can do that based on local evidence, which some boroughs already have.

The Brent Plan should contain evidence to disapply VBC, because it cannot assume the London Plan will do so.

(2) Brent Policy BH5: Affordable Housing

BH5 a) should replace the slash with "or", to make it slightly clearer that they are different types of housing, as now acknowledged in the Consolidated Changes to the Draft New London Plan.

Given the difference in costs of social and London Affordable Rent homes and the impact that the latter may have on low-income households in Brent, it is arguable that targets should just be for social-rented homes.

Otherwise, Brent should consider setting separate targets for social and London Affordable Rent - to ensure that these homes are not all delivered at London Affordable Rent, and to show a commitment to delivery of social-rented homes to meet the needs of low-income households.

It would be helpful to the public to add a clear 'planning' definition of "minor sites" (referenced in this section) and "small sites" (in BH4). Paragraph 6.2.50 is not adequate.

You deserve credit for trying to introduce financial contributions towards off-site affordable housing from sites of 5 to 9 units. But you should change that to 2 to 9 units. The Brent viability study only tested 5, 7 and 9 units, but it would be easy to

test 2 or 3 units.

What are the borough's proposed contribution amounts per unit? (LB Islington usually gets about £50k/unit.)

In September 2019 the Planning Inspectorate accepted Tower Hamlet's Draft Local Plan specifying 2 to 9 units after viability testing. That borough expects to get about £65-million over 10 years as a result. That also means that 8 London boroughs are now getting some contributions from minor sites.

(3) Brent Policy BH3: Build to Rent

Given the overwhelming need for social rent homes, and the increasing numbers of approved Build to Rent developments with no 'low cost' rent at all, schemes are failing to meet the most pressing housing need.

The Draft Local Plan's requirement for Build to Rent developments to provide 100% of their 'affordable' housing as London Living Rent should be changed. It should require a significant proportion of social rent (as Southwark's viability-tested Draft Local Plan does).

Why didn't the Brent Local Plan viability test this? Can you commit to urgently carry out a viability study on this subject?

Brent cannot claim to be doing everything possible to meet housing need or sustain mixed communities. If other councils are taking this step why isn't Brent? The Draft London Plan specifically allows boroughs to require some 'low cost' rent, including social rent.

(4) Brent Policy BH10: Resisting Housing Loss

You should take account of the Consolidated Changes to the Draft New London Plan on estate regeneration, which the London Plan panel has concurred with.

You should have a policy of no loss of social rented housing.

You should collect data long-term on what housing loss happens in the borough, and of what tenure, to inform future policy. You should also encourage other council departments to monitor and document changes in levels of poverty and deprivation in redeveloped areas.

Paragraph 6.2.89 should be rewritten so that it is understandable. Also,

"conformity with"

should be changed to

"justification for"

since that is the role of supporting evidence.

Paragraph 6.2.88 contains a strange underscore character that is not conventional; it cannot be copied and cannot be printed. Replace the nasty thing with a space.

(5) Brent Policy BH8: Older Persons Housing

Developers should be required to consider placing this type of housing alongside community facilities like child nurseries and infant schools, given the strong international evidence of improved social well-being to both generations (and possibly those generations in between) from such arrangements.

(6) Brent Policy BH6: Housing Size Mix

There is insufficient pressure on developers to supply family-sized homes. Brent should change policy BH6 to say:

"For every odd number of four dwellings included within a development, at least one must be 3 bedrooms or more. For every even number of four dwellings included within a development, at least one must be 4 bedrooms or more."

That means passing the 8, 16, 24, ... dwellings levels each adds an additional

guaranteed home of 4 bedrooms or more.

Any exceptions you choose to grant should not apply to larger developments, otherwise you discourage wider mixed communities.

In aiming for percentage housing tenure targets, on individual sites you should consider relaxing targets if it allows even more family housing in return. That is because of the obvious additional cost to developers of physically larger homes, but also the huge social stress within Brent of families desperately needing more space.

Figure 33 is unsound, because it erroneously collapses Social and London Affordable Rent. There are, however, quite wide differences in their costs and thus the impact on low-income households. For soundness, 'London Affordable Rent' should be removed from the table.

(7) Brent Policy BH9: Gypsies and Travellers

The West London Gypsy and Traveller Accommodation Needs Assessment you refer to has found:

“There is a need for 86 additional pitches for households that did not meet the planning definition. This is made up of 23 concealed or doubled-up households or adults, 16 teenage children who will be in need of a pitch of their own in the next 5 years, 2 movement from bricks and mortar, 4 from in-migration and 41 from new household formation using a formation rate of 2.25% derived from the household demographics.”

Clearly there is evidence of need arising from the site at Lynton Close, so the second half of the policy's first sentence is not justified and should be removed.

The sentence becomes:

“The existing Lynton Close travellers' site will be retained.”

The Needs Assessment also says:

“The need for those households who did not meet the planning definition will need to be addressed through other means such as the SHMA or HEDNA and through separate Local Plan Policies as set out in the revised NPPF.”

You cannot ignore the evidence and should plan to meet these needs. Policy BH9 should set a target to meet identified need of up to 90 additional pitches.

The welcome approach that accommodation for Gypsies and Travellers should be provided for in Growth Areas should generally be mandatory. The earliest possible provision within the Growth Areas should occur, to allow early and stable links to be made within the wider incoming communities, and to provide early school-settlement, job and training opportunities.

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