

Annual Monitoring Report 2019-2020



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1.0 Introduction

1.1 Purpose and Structure of the Report

This is the fifteenth Annual Monitoring Report (AMR) for the London Borough of Brent and covers the period April 2019 to March 2020. It serves as the Authority Monitoring Report consistent with Section 113 of the Localism Act 2011. Its purpose is to assess the extent to which the policies set out in the Local Plan are being achieved. The information in this report allows Brent's planning service to identify which policies are performing as intended and if any need to be reviewed.

The report starts by providing an overview of the work of the planning service. It sets out the number of applications, decisions and enforcement cases that have been dealt with over the period. It outlines the progress in developing the Local Plan, neighbourhood plans, and collecting and spending Community Infrastructure Levy (CIL) and Section 106 monies. In addition, a high level summary is provided as to how the Council has satisfied the duty to cooperate.



* The 31 non self-contained homes is the equivalent of 17.2 dwellings using the national conversion factor.

Brent's performance in 2019/20 at a glance:

- An increase in the number of homes delivered on last year, above the current London Plan target of 1525 dwellings per annum
- 752 affordable units completed, representing 31% of net conventional completions
- Phasing of delivery of housing on large sites, such as the continued development of the Quintain development in Wembley Park and Grand Union in Alperton
- Submission to the Secretary of State of the draft Brent Local Plan
- 5 POCAs finalised by the planning enforcement team. The total amount awarded was £682,249.47—of which £201,945.84 is expected to come to Brent
- Continued loss of office floorspace (over 6000 sqm), due to prior approval and through re-development
- A net increase in educational floorspace, mainly through a change of use from retail to higher education institution in Wembley
- A net increase in A1 (43 sqm) and A2 floorspace (463 sqm) within Brent's town centres
- A number of awards won for Brent's parks, including various London in Bloom awards
- Brent declared a climate change emergency in July 2019 and the majority of completed schemes adhered to current London Plan and Brent Council sustainability policies

2.0 Performance of the Planning Service

This section briefly outlines the main work of the Planning Service during 2019-2020.



Figure 1: shows documents forming the Local Plan as of March 2020.

The Local Development Scheme (LDS) sets the timetable for taking forward additional documents forming the Local Plan. Forthcoming documents and their current status are set out in Table 1. The LDS was reviewed in October 2019. As of the end of March 2020, three departures from the LDS had taken place. Consultation on the Staples Corner Growth Area Masterplan, the Neasden Stations Growth Area Masterplan and the S106 Planning Obligations SPD had been due to take place in Spring 2020, but as at the end of the 19/20 monitoring year, consultation had not yet commenced.

Document	Stage reached March 2020	Latest Status (outside of 19/20 monitoring year)
Local Plan and Policies Map	Submitted to the SoS on 17th March 2020	Examination in Public Undertaken Sept / Oct 2020 (outside of 19/20 monitoring year)
Staples Corner Growth Area Masterplan	Not started	Drafting commenced
Neasden Stations Growth Area Masterplan	Early draft stage	Early draft stage
Brent Design Guide (SPD1)	Not started	Not started—waiting for plan to be adopted to provide clarity on policy context of SPD
S106 Planning Obligations SPD	Early draft stage	Early draft stage
Barnhill Conservation Area Design Guide	Not started	Not started

2.2 Neighbourhood Planning

Neighbourhood Forum	Status March 2020	At the begin monitoring y three design	
Sudbury	Neighbourhood Forum & Area designated in December 2012. The Sudbury Neighbourhood Plan passed referendum and was adopted in September 2015. The Sudbury Town Residents' Association had its Neighbourhood Forum status renewed for a further 5 years on 8 December 2017. There have been no changes in the 19/20 year.	Neighbourho Forums and Neighbourho Progress ma Neighbourho date is sumr Further infor available at: <u>www.brent.g</u> neighbourho	
Harlesden	Neighbourhood Forum & Area designated by Brent Council in September 2015, and by the Old Oak and Park Royal Development Corporation within its area in November 2015. The Harlesden Neighbourhood plan was made in May 2019. Outside of the 19/20 year, an application for renewal of the Forum and Area was made to the Council and OPDC in October 2020 and a decision is likely to be made following the results of consultation in March 2021.		
Kilburn	Neighbourhood Forum & Area designated by Brent Council and Camden Council in June 2016. There have been no changes in the 19/20 year, however, the October 2019 LDS indicates that consultation on the draft Neighbourhood Plan is estimated to take place in early 2021.		

At the beginning of the monitoring year Brent had three designated Neighbourhood Areas and Forums and one made Neighbourhood Plan. Progress made by the Neighbourhood Forums to date is summarised adjacent. Further information is available at: <u>www.brent.gov.uk/</u> <u>neighbourhoodplanning</u>

Table 2: Summary of Neighbourhood Forum status

2.3 Development Management

4770 applications were received (applications of all types). Of the planning applications of the types listed below*, 1.45% of received applications were categorised as major. 97.62% of majors determined within the year were determined within the agreed timescales. Of all application types below*, 72.54% were granted consent.

ALL	Received	Determined	Granted	Percentage Granted (%)
2012/2013	2522	2805	1841	65.63%
2013/2014	2756	2696	1959	72.66%
2014/2015	2946	3123	2139	68.49%
2015/2016	3212	3243	2214	68.27%
2016/2017	3267	3522	2373	67.38%
2017/2018	3242	3497	2428	69.43%
2018/2019	2955	3124	2206	70.61%
2019/2020	2892	2961	2148	72.54%

Table 3: Applications received, determined and granted involving assessment of schemes against policies. *Only the following application types included ('con', 'ful', 'hse', 'vary', 'res', 'lbc', 'adv', 'amd', 'out', 'rem', 'lcd', 'ldo').

MAJORS	Received	Determined	Granted	Percentage
IVIAJOR3	Received	Determined	Granteu	Granted (%)
2012/2013	44	62	28	45.16%
2013/2014	49	54	35	64.81%
2014/2015	32	32	23	71.88%
2015/2016	53	31	23	74.19%
2016/2017	53	55	44	80.00%
2017/2018	52	66	47	71.21%
2018/2019	40	38	29	76.32%
2019/2020	42	42	36	85.71%

Table 4: Major applications received, determined and granted, from Q1-Q4 2019/20.

ALL	MAJOR	OTHER	MINOR
2015/2016	58.62%	73.03%	81.78%
2016/2017	82.61%	78.76%	80.94%
2017/2018	94.34%	88.34%	92.09%
2018/2019	100%	89.41%	87.47%
2019/2020	97.62%	86.17%	85.36%

Table 5: Percentage of applications determined within time (PS2 figures).

2.4 Enforcement

Ensuring that approved proposals are properly implemented and preventing unauthorised schemes is an important contribution towards sustainable development.

Type of enforcement activity	Number of cases
Live cases	1854
Enforcement notices served	172
Planning contravention notices served	78
Enforcement appeals dismissed	54
Direct action undertaken	14
Enforcement appeals allowed	11
POCA cases started	6
POCA cases finalised*	5
Enforcement appeals part allowed and part dismissed	4

Table 6: breakdown of enforcement activity

* Of the 5 POCA cases finalised, the total amount awarded was £682,249.47, of which £201,945.84 is expected to come to Brent.

2.5 The Duty to Cooperate

The duty to cooperate requires Brent to cooperate with neighbouring boroughs and other public bodies to address strategic planning issues, including the preparation of Local Plans. During the monitoring period, the council continued to engage with adjacent local authorities on its draft Local Plan.

Brent also continued to engage with other London boroughs through the West London Alliance in procuring a West London Employment Land Review (completed May 2019). In the 19/20 year, a Vision for Growth Strategy, and Guide to Supported Internships were published by the West London Alliance.

Brent also engaged with and contributed to the Association of London Borough Planning Officers. It also continued to engage with the Old Oak and Park Royal Development Corporation as it moves towards the adoption of their Local Plan and associated Supplementary Planning Documents, masterplans and evidence base.

As part of the Local Plan process a number of Statement of Common Ground documents were produced and agreed with statutory agencies, including the GLA, TFL, Canal and River Trust, Thames Water, Affinity Water and the Environment Agency.

2.6 Community Infrastructure Levy

The Council formally introduced Brent CIL in July 2013.

Total Brent CIL summary	Amount
Total CIL receipts for the reported year:	£27,269,890
Total CIL carried over from the previous reported year(s)	£84,027,462
Total CIL expenditure for the reported year:	£5,213,438
Of which, total amount of CIL applied to administrative expenses pursuant to regulation 61:	£745,780
Above as a percentage of CIL collected in the reported year:	2.73%
Total CIL retained at the end of 2019/20:	£105,253,906

Table 7: breakdown of CIL receipts 2019-20.

The CIL Regulations 2010 (as amended) stipulate that at least 15% of CIL receipts generated must be spent on Neighbourhood Projects or 25% of CIL receipts where a neighbourhood plan is in place. The Council undertakes two bidding periods - June & December each year – to provide the local community with an opportunity to apply for funding for projects that will help to support the impact of development. The Council is planning on re-launching NCIL in January 2021. Further information is available from www.brent.gov.uk/cil.

Brent is also a collecting authority for the Mayor's CIL. MCIL is passed on to TfL on a quarterly basis and will be used to fund the Elizabeth Line and Crossrail 2. The Mayor of London reports on this separately, as can be seen at the <u>MCIL page</u>.

CIL Neighbourhood Area	Sum of Totals (Spend)
Harlesden CIL Neighbourhood	£205,521.74
Kilburn & Kensal CIL Neighbourhood	£414,911.74
Kingsbury & Kenton CIL Neighbourhood	£148,068.41
Sudbury Town Residents Association (Neighbourhood Forum)	£2,761.00
Wembley CIL Neighbourhood	£1,108,590.49
Willesden CIL Neighbourhood	£335,302.19
Grand Total	£2,215,155.57

Table 8: A summary of Neighbourhood CIL projects 2019-20. Further information is available from NCIL Team by contacting NCIL@brent.gov.uk or visiting the <u>CIL spend information</u> webpage.

A separate Infrastructure Funding Statement is also published on the Council website as per the regulations. Further detail on the project spend outlined in Tables 7 and 8 is available in this separate CIL report. This replaces the previously published Annual CIL Report. The Infrastructure Funding Statement can be found at https://www.brent.gov.uk/media/16417549/brent-infrastructure-funding-statement-2019-20 final.pdf.

2.7 S106 contributions

S106 agreements are legal agreements between local authorities and developers. Below is a table which outlines the current status of all S106 payments for the last financial year.

Year S106 Contribution	The value of the					
s Paid	payment	Spent	Commissioned	Uncommissioned	Repayment	Reason
2019-20	£1,683,719.19	£144,465.02	£177,312.00	£1,361,942.17 *	N/A	N/A

Table 5: summary of S106 contributions spent by year they were paid.

* Replaced/ updated from previously reported figures.

3.0 Implementation of Policies

Policies Monitored: CP2, CP21, London Plan 3.8

3.1 Housing

Housing Targets

In this monitoring period 2,433 net additional dwellings were completed, which exceeds the current London Plan housing target for the borough of 1,525 units. There was a net loss of 31 non-self contained dwellings (all HMO rooms), equating to 17 self-contained units. A number of permissions for non-self contained accommodation (particularly student accommodation) are currently under construction with completion anticipated in the 20/21 year.

2416 net additional new dwellings



Figure 4: breakdown of net additional dwellings.

Affordable Housing

Of the homes completed during the monitoring period, 752 were affordable. This represents an increase from the previous monitoring year both in terms of percentage and in terms of actual delivery. Of the major development completions, 3 were permitted development, and therefore were not required to provide any affordable housing. A total of 14 other major developments were completed within the monitoring period, with 8 of these providing affordable homes. 2 of these major developments are located within the OPDC, but at the time of approval, were granted permission by Brent as a Local Planning Authority.

The council has limited control over the delivery of housing, with the exception of sites which are owned by the council, such as those within the South Kilburn Estate Regeneration project.

Year	Units completed (net)	Affordable units	% Affordable
2012/13	662	224	33.84%
2013/14	678	243	35.84%
2014/15	1557	707	45.41%
2015/16	1047	52	4.97%
2016/17	1306	281	21.52%
2017/18	693	110	15.87%
2018/19	1741	442	25.39%
2019/20	2433	752	30.91%
Total			26.72%

Table 10: Net completions of all conventional housing units including the breakdown of affordable*

Year	Units proposed	Affordable units	% Affordable
2015/16	1234	112	9.08%
2016/17	7976	2280	28.59%
2017/18	3730	1086	29.12%
2018/19	6802	1762	25.90%
2019/20	2701	884	32.73%
Total			25.08%

Table 11: Proposed units: Gross conventional housing units granted permission in each of the last 5 financial years including a breakdown of affordable housing as a percentage, excluding superseded permissions.

* Sometimes, the number of affordable housing units delivered on sites exceeds what has been approved in the original permission via the s106 legal agreement. As such, actual affordable housing completion rates may be higher than the number of affordable units originally consented. Contact has been attempted with registered providers on larger developments to determine the level of affordable housing being delivered to ensure as accurate reporting as possible.

3.1 Housing



Housing Size

The vast majority of homes delivered were 1 and 2 beds. Around 12% of homes had bedrooms of 3 or more, which is below the council target of 25%.



Self and Custom Build Register

The Self Build and Custom Housebuilding Act 2015 places a duty on councils to keep a register of people and community groups who are interested in self build or custom build projects in their area.

Self build projects are defined as those where someone directly organises the design and construction of their own home. This covers a wide range of projects including a traditional DIY self build home to projects where the self builder employs someone to build their home for them. Community-led projects can also be defined as self build.

Custom build homes are where you work with a developer as an individual or a group to help deliver your own home. The developer may help to find a plot, manage the construction and arrange the finance for your new home. This is more of a hands-off approach but your home will be tailored to match your individual requirements.

Base period	Date	No. individu- als	No. of organisations	Total
Base period 1	April-30 October 2016	28	0	28
Base period 2	31 Oct 2016 - 30 Oct 2017	35	0	35
Base period 3	31 Oct 2017—30 Oct 2018	41	0	41
Base period 4	31 Oct 2018—30 Oct 2019	24	0	24
Base period 5	31 Oct 2019—30 Oct 2020	39	0	39

Table 6: individuals and organisations registered for the first four base periods.

Local Planning Authorities have a duty to have regard of the entries in the register as we carry out our planning, housing, land disposal and regeneration functions. They must give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area.

The Self and Custom Build Register base years run from the 31st October to 30th October every year. Between 31st October 2019 and 30th October 2020 Brent Council granted permission for 181 residential units (net) meeting the definition of suitable serviced plots of land.

According to Government guidance, a suitable serviced plot of land is a plot of land that either has access to a public highway and has connections for electricity, water and waste water, or, in the opinion of a relevant authority, can be provided with access to those things within the duration of a development permission granted in relation to that land. However, it should be noted these might not necessarily come forward for self and custom build.

3.2 Town Centres & Cultural Facilities

Policies Monitored: CP1, CP7, CP10, CP16

Brent Council commissioned health check surveys for each of its 17 town centres in 2018, along with a Retail & Leisure Needs Study in 2018. The health check surveys were then updated throughout Autumn / Winter 2019. Due to the coronavirus pandemic, the council has not undertaken more up to date health checks for the 2020 year.

Retail Rents

Colliers have indicated that they did not attempt to collect retail rates in 2020 due to pandemic disruptions. However, they have noted that latest MSCI data suggested that as at July 2020, since the previous information provided in August 2019 for the 18/19 year, retail rents had been falling at a 7.5% year on year rate.

As such Colliers have indicated that in the absence of recorded information, reducing 18/19's figures by 7.5% would be indicative of where rents would be. This would mean that Kilburn prime rental rates would have reduced to approximately £92.50 per sq. ft. in Zone A (net effective), rental rates in Wembley would have reduced to approximately £64.75 per sq. ft. in Zone A (net effective). This would also mean that the Zone A Outer London average has reduced from £151 per sq. ft. (2017/18) to £138 per sq. ft. (2018/19), and down further to £127.65 per sq. ft. in (2019/20).



Figure 5: retail rents within Zone A from 1999/00-2019/20

Vacancy

Due to the coronavirus pandemic the Brent town centre health checks were not updated in 2020. The information below therefore represents the position of the town centres at the end of 2019, which still falls into the 2019/20 monitoring year.

In Brent vacancy levels have been decreasing but still remain high. Just over half of Brent's town centres have lower vacancy rates than the London average**, with 9 out of 17 coming in lower than the London average, compared to 8 the previous year. Neasden, Church End, Sudbury and Harlesden have seen the greatest reduction in vacant retail floorspace, while Wembley Park has seen the greatest increase. Willesden Green and Church End remain the town centres with the highest vacancy rates in the borough.

Units have been added to some of the town centres through the most recent town centre health check update (for example, where new units have been created). All additional units surveyed have been located within the town centre boundaries. Floorspaces which have been added have been based on available information such as planning permissions and taking measurements from maps and plans.

Centre Type	Centre Name	Vacant retail floor space as a % of total town centre floorspace* (2019/20)
Major	Kilburn	9
	Wembley Central	7
District	Burnt Oak	5
	Colindale	8
	Cricklewood	6
	Ealing Road	3
	Harlesden	6
	Kenton	7
	Kingsbury	0
	Neasden	7
	Preston Road	2
	Wembley Park	7
	Willesden Green	11
Local	Church End	12
	Kensal Rise	2
	Queen's Park	4
	Sudbury	4
Lon	don Average	6.1**

Table 7: Vacancy data in Brent's town centres.

* Data includes A1, A2, A3, A4, A5 and Sui Generis use classes. (Source: Regeneris Town Centre Health Checks 2018, updated Autumn / Winter 2019).

** Source of London Average: 2017 London Town Centre Health Check Report (January 2018). This represents the most up to date information for London as a whole.

Town Centre Floorspace

Over the monitoring period, within all of Brent's town centres (major, district and local), completions resulted in a net increase of A1 and A2 floorspace (43sqm of retail and 463sqm of financial and professional services, respectively) and a net loss of B1a office floorspace (963sqm). There was no net gain or loss of D2 (assembly and leisure) within the town centres. It should be noted that while the increase in A1 floorspace appears small, the apparently low total is due to the balancing out of some major gains and losses on different developments. 7 out of 13 of the major and district town centres did not see any change in town centre floorspace in relation to the A1, A2, B1a and D2 use classes. Only Burnt Oak, Harlesden, Willesden Green, Kilburn, Wembley town centres saw changes in floorspace (shown in Figure 6 below). Gains / losses within local town centres are also excluded.

The major loss in A1 floorspace within Burnt Oak was due to the redevelopment of 3 Burnt Oak Broadway, originally approved in 2011, and involving the demolition of a 3 storey retail building and replacement with mixed use development which incorporated A1 and A2 uses, but not to the same extent as the original unit. The 488sqm net gain of A2 floorspace at Burnt Oak arises from the same scheme. The small losses of A1 and A2 in Harlesden were all due to changes of use from retail to residential, one of which was through prior approval. The slight loss of A1 in Willesden Green was due a change of use from A1 to A3, with A3 still being considered a use acceptable in the town centre. The minor gain in Kilburn in A1 was also due to a change of use from other town centre uses. The gains of A1 in Wembley were due to a number of developments including the ex-Mahatma Ghandi House and plot W06 in Wembley Park. The 44sqm gain of A2 in Wembley was through a larger redevelopment which also saw a significant gain of A1 floorspace, with the A2 being provided as flexible floorspace. Finally, the slight gain of office floorspace in Wembley town centre was actually due to a major loss at Brent House balancing out with a major gain at W06 on the Quintain development in Wembley Park.

The Council acknowledges that they require flexibility to encourage a wider range of commercial uses within units that may become vacant. The draft Brent Local Plan includes policies around town centres and the night-time economy. The plan states the need for a lower threshold for retail impact studies and a flexible approach to enable the development of a mx of uses, supporting the increasing leisure function of Brent's town centres and enhancing their destination appeal.

It should be noted the figures only account for changes in floorspace where planning permission is needed. Many changes within the A use class are allowed under permitted development rights. Additionally changes to the Use Classes Order came into effect on 1st September 2020, creating a new use class (Class E—Commercial, Business and Service) which subsume A1, A2, A3 and parts of D1 and D2. This will have implications on changes in town centre floorspace in the future.



Net Change in Major and District Town Centre Floorspace

Figure 6: Change in major and district town centre floorspace 2019-20 (Source: London Development Database LDD and Acolaid).

3.3 Employment

Policies Monitored: CP1, CP3, CP7, CP12, CP16, CP20

Employment Land

Brent's designated employment sites comprise Strategic Industrial Land (SIL), which are designated in the London Plan due to their importance to the London economy, and Locally Significant Industrial Sites (LSIS), which are of strategic importance to employment in the borough. In addition there are smaller employment sites distributed throughout the borough, referred to as Local Employment Sites. Within SIL and LSIS there was a total net gain of approximately 14,104 sqm of B1 and closely related use classes (B2, B8 and Sui Generis) floorspace.

This figure is approximate, as a 290-space coach park (Sui Generis use) which was completed in Wembley is only partly located within Wembley SIL—approximately half of this has been counted. Due to this completion, however, there was a net gain of employment floorspace in Wembley SIL. Within Staples Corner SIL there was also an overall net gain in floorspace. Although there was some loss of floorspace due to the demolition of a warehouse to include parking, storage yard, service space and extensions to another warehouse on one site, this was compensated for by an increase in floorspace on another site through the demolition of a non-food retailing warehouse to provide a four storey car showroom, workshop and MOT centre. The Core Strategy target of an annual net increase of 1200 sqm in employment floorspace in Park Royal was met, with a net increase of 1657sqm.

Office Floorspace

The <u>Brent Employment Land Demand Study</u> identified additional demand for between 32,600sqm and 52,350 sqm of office floorspace in the borough to 2029. The Core Strategy has a target of no net loss of office floorspace which was not achieved during this monitoring period, with a net loss of 6328 sqm office floorspace across the borough. This is similar to what was lost last year.

The loss was due to a variety of reasons. Of the completions that involved a net loss of office floorspace, 9% of the floorspace lost was through prior approval. The remainder was lost through mixed-use redevelopment, comprising only four schemes, although the vast majority of the loss of office space comes from only two schemes. Of these, one of the schemes (ex-Mahatma Ghandi House) had a previous valid prior approval for office to residential. Another, the ex Brent-House Scheme, does provide flexible commercial floorspace on the ground floor (including the B1a use classes), but if all this floorspace were to be provided as B1a, there would still be an overall loss. Notwithstanding the losses, Quintain plot W06 completed within the 19/20 monitoring year providing over 13,000 sqm of office space over 8 floors and contributing significantly towards new office space within the borough.

In May 2013 the government introduced permitted development rights allowing offices to convert to residential, subject to prior approval of certain limited matters. This had significantly limited the council's ability to prevent the loss of office space. The council subsequently confirmed Article 4 Directions in August 2018 to remove these permitted development rights in some parts of the borough. The council consulted on extending this Article 4 Direction to cover the rest of the borough between October and December 2019, and this was confirmed in October 2020.



Figure 7: percentage of office floorspace lost by cause 2019/20 (Data sourced from LDD and Acolaid).

The Core Strategy sets the target for an increase in residents employed in the tourism sector, and for a net increase of 500 jobs per annum in Wembley. The ONS Business Register and Employment Survey indicates between 2017 and 2018 the number of jobs in Wembley reduced by approximately 500 jobs. The number of Brent residents employed in tourism (accommodation and food services, arts, entertainment, recreation and other services) increased slightly from 14,000 to 14,500 people. Between 2017 and 2018 these jobs as a percentage of overall employment increased slightly from 10.9% to 11.5% - a return to 2016 levels.



Figure 8: proportion of population employed in different employment sectors (Source NOMIS BRES data).



Figure 9: proportion of the workforce employed in tourism compared with London and Great Britain. (Source NOMIS BRES data).

Brent Works prepares and equips local residents to secure and sustain employment opportunities created by regeneration projects in the borough. During the monitoring period Brent Works assisted 126 people into jobs (against a target of 100), and 60 people into apprenticeships (against a target of 60).

Policies Monitored: CP7, CP8, CP9, CP10, CP11, CP12, CP18, CP23

School Places / Education

There was a net increase in educational floorspace of 4,485 sqm.

This majority of this was due to a change of use of first and second retail floors to college for higher education in Wembley. However, there was also a change of use from a flexible commercial unit into education use, and a permission for the permanent retention of a modular building at Mount Stewart Junior School. There were no net losses of this type of floorspace within the monitoring year. Expansions of Xenon Manor Primary School and works at the Oakington Manor Primary School are currently underway.

Healthcare Facilities

There was a net loss of 7159 sqm of floorspace for healthcare facilities. The majority of this was at the Central Middlesex Hospital (now within the OPDC area), with the application submitted in 2010 and the land having already been cleared for redevelopment. Whilst construction on this site began many years ago, the loss of D1 floorspace has only been recorded in the 19/20 year due to the final completion of redevelopment of part of this site taking place. Three other small losses of D1 floorspace relate to three doctors surgeries being converted into residential units. There were some small gains in this type of D1 floorspace through the change of use from part of a warehouse to an ophthalmic service, a change of use from office to a mixed use

of B1 and D1 (workspace and treatment room), and the retention of an outbuilding for use as a physiotherapy centre (D1).

Other Community Space

There was an overall net increase of approximately 413 sqm of other D1 floorspace. This was mainly due to the completion of flexible A1-A5, B1 and D1 floorspace at the Former Oriental City site (Bang Bang Food Hall / 399 Edgware Road) in Kingsbury, which has two studios to hire available to the community. Within this net gain is a loss of 750 sqm of community floorspace at the Summit Court Garages site, which included the demolition of a community room to provide 11 new affordable dwellings.



Community Space at 399 Edgware Road (source: http:// bangbangoriental.standard.aws.prop.cm/)

Cultural and Leisure Facilities

There was a net loss of 601sqm of D2 cultural and leisure facilities floorspace due to the completion of the redevelopment of a vacant former men's' working club on Craven Park Road.



Amount of Floorspace Lost / Gained (sqm)

Figure 10: Community floorspace loss/gain (Source LDD and Acolaid).

3.5 Green Infrastructure

Open Space & Green Infrastructure

There were 1033 trees planted across Brent in public areas by the council in the 19/20 monitoring year. This figure does not include trees planted on private schemes, such as Wembley Park. Historically, to assess the quality of parks, the Core Strategy set a monitoring target of parks awarded Green Flag status. However, the council has not entered any parks into the Green Flag award scheme since 2014. The Council works to achieve green flag standard on a number of parks but do not apply for the award. The Council has also previously commissioned the services of Keep Britain Tidy (KBT) to undertake and assessment of the quality of Brent's parks and open spaces.

Brent has once again won numerous awards at the London in Bloom awards, winning 11 awards in total, including 5 gold awards, 4 silver awards and 2 Best in Category awards. Brent's Parks Service were also national winners of the APSE Parks and Greenspaces Innovation Award 2019 or the Bee corridors.

Parks and Play Spaces

Volunteers made improvements to Quainton Street Open Space, Welsh Harp Open Space and Fryent Country Park. A newly formed charity (Northwick Park Community Garden) arranged several community events to plant an orchard at Northwick Park. New or upgraded equipment and surfacing was provided in the following parks (the majority of work was undertaken in the 19/20 monitoring year, although some completion work may have extended into 2020/21): Neasden Lane Park, Gibbons Recreation Ground, Wood Road Play Area, Preston Park, De Havilland Open Space, Eton Grove Open Space, King Edward VII Park, and an enhanced playground at Woodcock Park.

The following works were also undertaken:

- Landscaping to the north of Grove Park
- Community hub installation at Harlesden Town Gardens
- Improvements to King Edward VII Park
- A range of projects at Barham Park.

Of major developments completed in the 19/20 year, the Brent House development features a new public square and play space. There was a loss of playspace (Powerleague) with the development of Plot W03 in Wembley Park, however, this was a meanwhile-use and has been relocated.

Biodiversity

There was a loss of 0.053 ha of Sites of Importance for Nature Conservation (SINC) due to a development next to Waverley Court, Brondesbury Park. The development follows an earlier extant permission and an appeal decision whereby the Inspector decided that given the current condition of the land (which had already been cleared), the appeal proposal would not harm the nature conservation value of the site. Permission was subsequently granted for 6 flats and completed in 19/20. The Parks Service continued with improvements to the Bee-corridors, continuing the innovation from leaving selected areas of grass to grow longer during the spring and summer, to planting within strips of plants within those areas to provide nectar for bees and habitat for other wildlife.



Volunteers at Quainton Street Open Space (photo source: semble.org)



Brent's Bee Corridors (photo source: Brent Council)

Policies Monitored: CP7, CP19, London Plan policy 5.2

Carbon Reduction & Sustainable Drainage

Brent Council declared a climate change emergency in July 2019 and has produced an updated draft Climate Change Strategy (2021-2030). Within the monitoring period, 17 major residential developments were completed (including parts of the Quintain Wembley Park development). A summary of the sustainability of these schemes is shown in the table below. 11 schemes adhered to London Plan and Brent Council sustainability policies, based on the time of consent in relation to reduction in CO2 emissions, renewables and the GLA energy hierarchy. One scheme was required to make a payment to a carbon offset fund. Another two formed part of larger outline permissions in Wembley Park, one of which predated the 2010 reduction in CO2 emissions target. 3 schemes were office to residential conversions granted through the prior approval process, and therefore sustainability standards could not be required.

Application	Sustainable Urban Drain- age Systems	GLA Energy Hierar- chy	Reduction in CO2 emis- sions on Part L 2010	Renewables
18/3920—3 Drakes Court- yard, Kilburn High Road	Not Required— Prior Approval (Office to Resi- dential)	Not Required—Prior Approval (Office to Residential)	Not Required—Prior Approv- al (Office to Residential)	Not Required— Prior Approval (Office to Residen- tial)
17/4179— 1-2 Drakes Courtyard, Kilburn High Road	Not Required— Prior Approval (Office to Resi- dential)	Not Required—Prior Approval (Office to Residential)	Not Required—Prior Approv- al (Office to Residential)	Not Required— Prior Approval (Office to Residen- tial)
18/3127—70 & 72 Salus- bury Road	Not Required— Prior Approval (Office to Resi- dential)	Not Required—Prior Approval (Office to Residential)	Not Required—Prior Approv- al (Office to Residential)	Not Required— Prior Approval (Office to Residen- tial)
17/1342—3 Burnt Oak Broadway	Yes	Yes—Passive design, Zero carbon energy systems, onsite CHP, Energy efficient measures	>25%	PV panels
17/0328—Plot 06 Green Car Par (Wembley Park— W06)	Yes	Partly—energy efficient measures, CHP, but no renewable energy measures	35%	None—emission targets to be met without renewable energies
17/0190—61 Craven Park Road	Yes	Yes—solar PV and LZC, fabric and overall effi- ciency of building	Fails to meet—payment re- quired to carbon offset fund	PV panels and LZC
16/4506—Land Next to Wembley Arena Square (W03)	Yes	Partly—Passive energy efficiency measures, CHP, communal heating and individual ventilation	Not specified—original out- line permission is dated 2007.	None
16/1698—53-63 Wembley Hill Road	Yes	Yes—energy efficiency, CHP and PV	> 35%	PV panels

3.6 Sustainability

Policies Monitored: CP7, CP19, London Plan policy 5.2

Application	Sustain- able Urban Drain- age Sys- tems	GLA Energy Hierarchy	Reduction in CO2 emissions on Part L 2010	Renewables
16/1404—Amex House, North End Road	Yes	Yes—energy efficiency measures, CHP and solar panels	> 30%	Solar Panels
15/5068—24-51 Inc, John Barker Court, 12-14 Brondesbury Park	Yes	Yes—energy efficiency measures, PV, although CHP ('be clean') not found to be viable	35%	PV panels
15/4743—349 Brent House, High Road	Yes	Yes—energy efficiency measures, HVAC system, CHP, PV panels	32% and carbon off- set contribu- tion	PV panels
15/1892—Summit Court Garages, Shoot Up Hill	Yes	Yes—energy efficiency and PV pan- els, although CHP ('be clean') not found to be viable	36%	PV panels
15/1337—Phases 2 & 3 Former Oriental City, 399 Edgware Road	Yes	Yes—CHP, PV, ground source heat pumps	25%	Solar PV, ground source heat pumps
14/4254—18 Neasden Lane	Yes	Yes—energy efficiency measures, CHP, PV panels	> 40%	PV panels
15/4714—ex Mahatma Ghandi House, 34 Wem- bley Hill Road	Yes	Yes—passive design features and demand reduction, CHP—although renewables are not viable	46%	None—would reduce quantum of amenity space, and emission rates already exceed targets
13/1296—Land next to Victoria Centre, Acton Lane*	Yes	Yes—fabric measures, ventilation, passive measures, CHP, PV panels	25%	PV panels
10/3221—First Central, Coronation Road*	Yes	Yes—passive design features and demand reduction measures, CHP, PV panels	22%	PV panels

* Schemes are now located within the OPDC.

Table 8: Major schemes' sustainability

District Wide CHP Wembley

No district-wide CHP systems were delivered in Wembley. However, a CHP system was completed on the Quintain Wembley Park development on plot E03. This will serve the Quintain Wembley Park development. In line with the Wembley Area Action Plan, major developments coming forward within the growth area have been designed to allow future connection to a network.

3.7 Waste

Policies Monitored: London Plan 5.16, London Plan 5.17 Waste Capacity, West London Waste Plan

Waste Collection

The total amount of municipal waste collected in 2019/20 was 107,796 tonnes, a 0.1% increase from the previous year. The proportion of waste recycled and composted in the borough was at its highest point in 2011-12 and has subsequently declined, although the amount of waste recycled in 2019/20 was higher than the previous year. In 2019/20 30% of the borough's waste was recycled and composted, which is below the existing London Plan target of 45% and the Intend to Publish London Plan target of 65% by 2030.

Waste Sites

During the period there was no loss of safeguarded waste management sites or waste management capacity. Safeguarded and existing sites are listed in the West London Waste Plan available at: www.brent.gov.uk/localplan.





Figure 11: amount of municipal waste by disposal method.

Proportion of municipal waste recycled or composted (%)



Figure 12: proportion of municipal waste recycled or composted from 2003 to 2020

3.8 Site Allocations & Wembley Area Action Plan

The implementation of Site Specific Allocations will be monitored against the estimated phasing of the delivery of development and will also be assessed as to whether or not development is in accordance with the guidance for each site.



Completed Started on site Permission granted Application submitted No progress

Wembley

Site Specific Allocation	Other Land Uses Proposed	Planning app reference	Status 2019/ 2020
Wembley Central Square	Residential	01/1714	Completed 155 units
Elizabeth House	Residential	09/2506	Completed 115 units
Quadrant Court HA9 0BY (W04)	Residential	06/3630	Completed 232 units
Forum House HA9 0AB (W01)	Residential	05/2949	Completed 286 units
W1 Wembley West End	Main Town Centre Uses/Car Parking	15/4473	Completed 186 units
W2 London Road	Main Town Centre Uses		No progress.
W3 Chiltern Line Cutting North	N/A		No progress.
		Chesterfield House - 15/4550.	Chesterfield House - permission granted for 239 residential units and ground floor retail and commercial. Under construction.
W4 High Road/Chiltern Line Cutting South	Main Town Centre Uses/Offices/Student Accommodation/Hotel	Brent House Annexe - 15/1310.	Brent House Annexe - prior approval 25 residential units. Completed.
		Lanmor House - 14/1700.	Lanmor House - prior approval 30 units. Completed.
		Land, garages, alleyway rear of 416-444, High Road—18/3111	256 units—(permission granted outside of 19/20 monitoring year)

Site Specific Allocation	Other Land Uses Proposed	Planning app reference	Status 2019/ 2020
		Brent House - 15/4743.	248 units—completed
W5 Copland School and Brent House	Redeveloped school/Mixed use development frontage	Copland School (now Ark Elvin Academy) - 15/3161.	Ark Elvin Academy - permission granted redevelopment and expansion. Occupation Sept 18.
W6 South Way Site	Main Town Centre Uses	15/3599 ; 14/4931; 17/0718—553 units 14/4931—188 units	188 units completed Remainder under construction
W7 Mahatma Ghandi House	Office	15/4714	198—completed
W 8 Land West of Wembley Stadium	Main Town Centre Uses/ Community/Leisure/Office	15/5550	Permission granted 3990 residential units and 59573 sqm commercial floorspace. Completed
W 9 York House	Mixed use	18/2197; 19/0073 & 15/5550	Prior Approval office to residential 369 dwellings— under construction Reserved matters for primary school—no start
W 10 Dexion House	Retail/Office/Leisure/Student Accom./Hotel/Community Swimming Pool	14/3624	Completed
W 11 Malcolm House	Retail/Office/Leisure/Student Accom./Hotel/Community Use	08/2633	Permission for a 7 storey and 11 storey hotel, restauran <u>t</u> and parking. Started.
W 12 North West Lands	Retail/Office/Leisure/Student Accom./Hotel/Community Use	10/3032, 15/5550, 14/4330, 15/5394, 18/4422	Permission granted for 2446 units. Started.
W 13 Stadium Retail Park	Retail/Office/Leisure/Student Accom./Hotel/Community Use	17/3059 (outline) - approx. 995 units	Wider Wembley Masterplan see W8. Resolution to grant subject to legal agreement
W 14 Arena House and Crescent House	Office/Education/Student Acomm./Hotel	-	No progress
W 15 Apex House & Karma House	Hotel/Commercial/Affordable	Shubette House - 08/3009.	Shubette House - completed 2013.
	Workspace	Apex House - 15/4708.	Completed 558 unit student accommodation.
W 16 1 Olympic Way	Office	16/2156 & 17/4538—229 units 19/0395—additional 119 units	Under construction
W 17 Olympic Way Office Site	Leisure/Tourism/Cultural	14/4981.	211 residential units and ground floor commercial completed.
		14/0363 & 16/5563	Planning permission 707 unit student accommodation. Completed and increased by 8 units

Site Specific Allocation	Other Land Uses Proposed	Planning app reference	Status 2019/ 2020
W 18 Wembley Retail Park	Public Open Space/Primary School	575 North End Road - 13/1494.	575 North End Road - delivered 450 student accommodation. Completed.
		15/5550	Wider Wembley see W6.
W 19 Wembley Stadium Car Park	Leisure	15/5550; 17/0462; 17/0016; 17/0016; 17/3213	Permission for 1834 dwellings. Started.
W 20 Cottrell House & Norman House	Retail/Commercial/Community Faculties	16/1698	Start on site 55 dwellings
W 21 21-31 Brook Avenue	N/A	10/2814	33 residential units completed.
W 22 Wembley Park Station Car Park	N/A	12/3499	Delivered 109 residential units. Completed.
W 23 The Torch/Kwik Fit Euro	Retail		No progress
W 24 Town Hall	Office/Retail/Community Facilities	13/1995	Now converted into a French School.
W 25 Amex House	Office/Managed Affordable Workspace	16/1404	Completed—195 units
	Office/Leisure/Managed Affordable Workspace/Community	Parkwood House— 17/2782	283 bed student accommodation. Started.
W 26 Watkin Road		10 & 11 Watkin Road— 18/3381; 19/2750	229 units—under construction
		1,2,3&9 Watkin Road— 20/0587	174 units—to be determined
		Remainder of allocation	No progress
W 27 Euro Car Parts	Office/Leisure/Student Accom/Managed Affordable Workspace/	-	No progress
W 28 First Way	Leisure/Hotel/Office	12/1293	Tipi & Alto complete (705 units).

Table 9: development status of site allocations within the Wembley Growth Area as of 2019.

South Kilburn

Site Specific Allocation	Land uses proposed	Planning app reference/ target date for planning application	Status 2019/ 2020
SK1. Queen's park station area	Community Facilities, Retail and bus interchange	12/0788	Started on site.
SK2 British Legion, Mar-		12/1516	144 units—completed
shall Hse & Albert Rd Day Centre	N/A	09/3319	153 units—completed
SK4 Canterbury Works	Offices and community facilities	Canterbury House - 15/0696	Canterbury house completed 24 units.
			Canterbury Works—remainder of site reserved for HS2 Vent Shaft
SK5 Moberley Sports Cen- tre	Sports & nursery school	13/3682	Completed 71 units.
Gordon House			Completed 26 units.
Texaco Site			Completed 50 units.
Site 11a (Swift House & George House)			Completed 153 units.
Site 11b			Completed 144 units.
Argo Business Centre		184023	Completed 93 units.
SK Phase 1b Cambridge / Wells, Ely, Bond Hicks Bol- ton	Residential		Completed 90 units.
SK Phase 2a Bronte & Fielding	Residential		Completed.
Site 3c (Hansel Road)			Completed 133 units.
SK Phase 3a Gloucester & Durham	Residential	12/0788	235 homes—under construction
SK Phase 3a 4-26 Stuart Road / 5-9 Chippenham Gardens	Residential	16/1191	52 homes—under construction
SK Phase 3a Peel Precinct	Residential & Retail	16/4174, 19/3259	226 units and doctors' sur- gery—under construction
SK Phase 3b Woodsworth & Masefield (new school site)	Residential		No progress.

Table 10: development status of site allocations within the South Kilburn Growth Area as of 2019.

Alperton

Site Specific Allocation	Land uses proposed	Planning app reference/ target date for planning application	Status 2019/ 2020
Atlip Road	Residential & Commercial	06/0856	Completed 186 units.
243 Ealing Road	Residential & Commercial	09/2116	Completed 440 units.
A1 Alperton House	Residential/Workshops/Food & Drink	18/4199	474 residential units, com- mercial, retail, office. Not started.
A2 Minavil House & Unit 7 Rosemont Road	Residential/Office	16/2629	251 dwellings and retail. Started.
A3 Former B&Q and Mar-	Residential/B1 workspace/A3	B&Q (243 Ealing Road - 13/0653	B&Q (243 Ealing Road) com- pleted 140 units.
velfair House	Also 17/1104 253a Ealing Road 20dwellings 15/3950 1c Carlyon Road 38 dwellings	Marvelfairs House - 14/2276	Completed. 125 dwellings and B1 office.
A4 Atlip Road	Residential/Employment/A3 uses	15/2061	15/2061 expired after 19/20 monitoring year—no pro- gress
	Residential/Commercial including workspace & A3	2014—Remainder of Site Allocation	No Progress
A5 Sunleigh Road		18/0418 - Chanton House, 498 Sun- leigh Road	Completed—26 units
		18/0320—82 Sunleigh Road	Not Started—
A6 Woodside Avenue	Residential/B class including afforda- ble workspace	18/4919	18/4919—refused outside of 19/20 monitoring year
		All Units at Abbey Wharf & Delta Centre and All of 152, Mount Pleasant - 16/4478	135 residential units under construction.
A7 Mount Pleasant/ Beresford Avenue	Residential/Work-live/ managed affordable workspace	Afrex House / Ambassador House—18/0752	31 units under construction
		Remainder of site alloca- tion	No progress
Northfields	Housing, employment, retail and leisure	18/0321 and 19/0465	Application for mixed use development including 3030 units—under construction

Table 11: development status of site allocations within the Alperton Growth Area as of 2019/2020.

Burnt Oak/Colindale

Site Specific Allocation	Land uses proposed	Planning app reference/ target date for planning application	Status 2019/ 2020
B/C1 Oriental City & Asda	Residential/Retail/ community use (incl. school) /commercial	Oriental City - 15/1337	Completed—183 units
			Asda – no progress.
B/C2 Sarena house/ grove park/Edgware road	Residential/Workspace (incl. managed affordable)	Sarena House - 14/2930	Completed—227 units
			381-383 Edgware Rd—no progress
B/C3 Capitol Way	Residential/Retail / car show- room / community use	08/2823	First phase complete (243 units). Remaining 219 resi- dential units to be delivered.
B/C4 3-5 Burnt Oak Broadway	Residential/Retail	11/0403	Completed—76 units
Capitol Industrial Park	Residential Employment	17/0837 (414 units) 19/4545 (501 units—to be de- termined as at March 2020)	Permission granted

Table 12: development status of site allocations within the Burnt Oak/Colindale Growth Area as of 2019.

Church End

Site Specific Allocation	Land uses proposed	Planning app reference/ target date for planning application	Status 2019/ 2020
CE1. Church End local centre	Residential/Retail, public square, local offices and health centre	13/2213	Permission granted— commenced
		13/1098	Permission granted— commenced
CE3. Former White hart PH and Church	Residential/Retail	White Hart PH - 09/1208	White Hart PH - scheme completed 76 units Sep 2012.
			226 occupied by a church and recording studio. No progress
CE4. Homebase	Residential/Retail	2012	No progress.
CE5 Chancel House	Residential/Employment Use	19/2804	Application for a secondary school—resolution to grant subject to s106 (outside of monitoring year)
CE6. Asiatic Carpets	Residential/Light Industrial/ Managed	2012	No progress.

Table 13: development status of site allocations within the Church End Growth Area as of 2019.

Site Specific Allocation	Land uses proposed	Planning app reference/ target date for planning application	Status 2019/ 2020
1. Metro Hse.	Residential	09/2650	Completed. Delivered 143 residential units.
2. Garages at Barnhill Rd	Residential	10/2104	Completed. Delivered 9 residential units.
3. Dollis Hill Estate	Residential/New school and employment development	10/1388	Completed. Delivered 160 residential units.
4. Dollis Hill House	Residential/Food & drink use / community use / conferencing	-	Site now landscaped as feature in the park. Completed 2012.
5. Priestly Way, North Circular Road	Employment development	-	No progress.
6. Neasden Lane / Birse Crescent	Residential/Retail	2012	No progress.
7. Neasden Lane / North Circular Road	Hotel/Retail	2012	No progress.
8. Former N/A Kingsbury Library & Community Centre	Community/Education Use	08/1106	Completed. Education centre and extension.

Site Specific Allocation	Land uses proposed	Planning app reference/ target date for planning application	Status 2019/ 2020
9. Harlesden Plaza, Man- or Park Road	Residential/Retail / Community Use	09/0732	Retail development com- pleted 2013.
10. Former Willesden Court House	Residential/Community use	08/1629	Completed. Delivered 38 residential units and com- munity space.
11. Manor Park Road	Residential	2014	17/2331—appeal allowed.
12. Former Willesden Social Club & St. Jo- seph's Court	Residential/community use	13/3702	Completed.
13. Sainsbury's Super- store	Residential/Retail	2014	No progress.
14. Clock Cottage	Residential/Community use/ Residential institution	16/3294 (16 units); 20/1561 (13 units)	Under Construction
16. Morrison's Super- market	Residential/Retail	18/2183	194 units under construc- tion on parking land east of Morrisons.
17. Alpine House	Residential/Affordable Work- space	12/2612	Completed. Delivered 144 residential units and 1705sqm employment floorspace.
18. Bridge Road	Residential	10/3226	Completed. Delivered 4 residential units.
19. Stonebridge Schools	Residential	16/0077	Completed. Delivered 73 units.

Site Specific Allocation	Land uses proposed	Planning app reference/ target date for planning application	Status 2019/ 2020
20. Former Unisys & Bridge Park Centre	Residential /Community use/ Sports facilities, B1, local needs retail and hotel	2012	No progress.
21. Land Adjoining St. Johns Church	Residential /Community facility	09/3104	Completed. Delivered a church hall and 4 residential units.
22. Roundtree Road	Residential Community /retail	09/2350	Completed
23. Vale Farm Sports Centre	Sport and recreation	-	No progress.
24. Wembley Point	Residential/Office/ local retail/leisure/ community use	Wembley Point—15/1625 & 16/4997, 16/3049; 18/3125 Argenta House—18/4847	Wembley Point - permission for 439 units. Started on site. Application for 130 units at Argenta House—resolution to grant (granted outside of 19/20 year).
25. Vivien Ave.	Residential/ Community use	12/2653	Completed. Delivered 40 extra care units and new community open space.
26. Old St. Andrew's Church	Community use	-	Now in use as a church.
27. Hawthorn Road	Residential	11/0952	Completed. Delivered 20 residential units.

Site Specific Allocation	Land uses proposed	Planning app reference/ target date for planning application	Status 2018 / 2019
28. Queen's Parade / Electric House	Residential /Retail /Food & Drink	Electric House - 13/1428	Electric House delivered 25 residential units - completed.
	Residential /Retail /Food & Drink	Queen's Parade—17/0322	Queen's Parade – application for 106 student residential accommodation units Refused due to failure to provide S106
29. Former Dudden Hill Lane Playground	Residential /Community/ Leisure or Retail	19/2688	Permission for 29 units
30. Gaumont State Cinema	Community /Arts & Culture /Retail / Entertainment / Employment Workspace	-	Change of use to place of worship implemented.
31. Kilburn Square	Residential /Community use and Retail	09/0410	No progress.
32. Former Rucklidge Service Station	Residential	07/2829	Completed. Delivered 14 residential units and ground floor retail.

Table 14: development status of site allocations which are not within Growth Areas (i.e. 'other sites') as of 2019/2020.

3.9 Housing Delivery Test

Policy context

The National Planning Policy Framework (NPPF) 2019 requires local authorities to demonstrate that they have delivered a sufficient proportion of their housing targets over a rolling three year period. If the authority has not met 95% of its target they have to prepare an Action Plan which will help guide the council's future actions, supporting them to bring forward more homes. Since March 2015, Brent's target has been 1,525 from the Further Alterations to the London Plan (FALP). The draft London Plan (2018) proposed a much more ambitious target for Brent of 2,915 homes per year over the next ten years. However, following examination in summer 2019, the panel of Inspectors recommended that this target be reduced to 2,325 homes per year over the same period, which the mayor has now accepted. Monitoring of this target will be carried out in future AMRs. Housing Delivery Test figures below are based on the targets of the current adopted London Plan.

The target figure consists of both self contained homes and communal homes. Communal homes are homes with shared facilities and therefore do not constitute entire homes themselves. In this case these homes are divided by the average number of residents occupying them; on average student accommodations are occupied by 2.5 students, and other communal facilities by 1.8 residents. Brent has delivered 5347.6 homes over the past 3 years which constitutes 116.9% of its target of currently adopted London Plan target of 4575. Under this methodology the council is seen to have delivered more housing than required by its housing target and will therefore not have to produce an Action Plan. These figures are subject to verification by government.

Year		Net Communal Accommodation	Communal/2.5	Net Homes HDT Figure
2017-18	694	1266	506.4	1200.4
2011 10		1200	000.1	1200.1
2018-19	1741	-24	-9.6	1731.4
2019-20	2433	-31	-17.2	2415.8





Figure 11: Data sourced from the MHCLG live tables: Net Dwellings Nov20 & LDD.

4.0 Housing Trajectory

Policy Context

The National Planning Policy Framework (NPPF) 2019 requires strategic policies to include a trajectory illustrating the expected rate of housing delivery over the plan period. It also requires authorities to identify and update annual a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

Brent's housing target

Brent's annual housing target is set out in the London Plan. In 2014/15 the target for net housing completions was 1,065. Following adoption of the Further Alterations to the London Plan (FALP) in March 2015 this annual target increased to 1,525 for the period 2015/16 to 2024/5. It comprised conventional supply, non-self contained accommodation and vacant properties returning to use.

The draft London Plan (2019/20—2040/41) went through examination in 2019 and the Inspectors' report was published in October 2019. Following recommendations from the Inspectors, the revised housing target for Brent in the Intend to Publish London Plan (December 2019) is 2,325 dwellings per annum. The draft Brent Local Plan (submitted to the Secretary of State in March 2020) seeks to achieve and exceed this target.

Five-year housing supply

The five year-housing supply included in this document is based on the housing trajectory submitted in August 2020 to the Planning Inspectorate as part of the examination of the draft Brent Local Plan. The future supply of conventional and non-self contained accommodation in the housing trajectory is based on:

- Sites in the development pipeline i.e. with extant planning permission or approval (gained through prior approval process), either under construction or not yet started;
- Sites which have resolution to grant subject to S106, and are considered to be deliverable in the next 5 years;
- Sites allocated within the draft Brent Local Plan which have permissions to be determined or pre-apps but are considered to be deliverable in the next 5 years;
- Sites allocated within the draft Brent Local Plan which form part of the South Kilburn Masterplan, and where there will either be a net gain or net loss of dwellings in the next 5 years;
- An allowance for windfall sites

A detailed breakdown of deliverable sites comprising the 5 year supply is included on the following pages. The majority of these sites identified have extant planning permission or prior approval (78% in total) and of these, 57% have started on site. Annex 2 of the NPPF (2019) defines a deliverable site, and such sites are considered deliverable unless there is clear evidence to the contrary. The remaining sites are considered to be deliverable in principle and have required further evidence to be considered deliverable, in line with the NPPG (2019) and a recent decision in the courts which extended the scope of what can be considered deliverable.

Windfall

Authorities may make an allowance for windfall sites in the five-year supply if there is compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic, having regard to the SHLAA, historic windfall delivery rates and expected future trends. The Council has taken the expected windfall totals outlined in the West London Small Sites SHLAA (2018) and subtracted sites of 25 dwellings or less to avoid double counting of such sites in the windfall totals. This is the method used in the version of the Housing Trajectory submitted to the Planning Inspectorate for the examination of the draft Brent Local Plan.

Undersupply

Planning Practice Guidance requires local planning authorities to deal with any undersupply within the first five years of the plan period where possible. Since Brent's Core Strategy was adopted in 2010 cumulatively Brent has exceeded its housing target by 1910 units.

Buffer

The NPPF (2019) requires a supply of specific deliverable sites to in addition include a buffer of either 5%, 10% or 20%.

Brent exceeded its housing target from 2012/13 to 2016/17, and from 2018/19 to 2019/20. The 2017/18 year was an exception, recording an under-delivery of 215 units. Cumulatively, the borough has exceeded its housing target since the Core Strategy was adopted in 2010 by 1910. The borough does not have a history of under delivery and accordingly a 5% buffer should be applied.

Draft Brent							2024			
Local Plan ref.	SSA / WAAP ref.	Address	Туре	Status	Planning App Ref#	2020- 21	2021- 22	2022- 23	2023- 24	2024- 25
			Full Planning Per-	Status		~ -		23		23
n/a	SSA B/C3	Colindale Retail Park, (Wickes) Capitol Way	mission	Started	08/2823	219				
		SK Phase 3a Queens Park Station & Cullen	Full Planning Per-							
n/a	n/a	House Area (Site 18)	mission	Started	12/0788			-31		137
			Full Planning Per-							
n/a	WAAP W28	Kelaty House	mission	Started	12/1293		240			
			Full Planning Per-							
n/a	n/a	SK Phase 3a Gloucester & Durham	mission	Started	14/1896	83	152			
n/a		Souh West Lands SW01/02/07	Reserved Matters		14/493 & 18/0742			156	j	
n/a	WAAP W6	South West Lands SW03/04/05/SW06	Reserved Matters	Started	14/4931 & 15/3599; 17/0718	553	•			
			Full Planning Per-							
n/a	SSA A3.2	1C Carlyon Road	mission	Started	15/3950	10)			
. /.			Full Planning Per-	Charles I.		220				
n/a		Chesterfield House	mission	Started	15/4550	239)	200		
n/a		QED North West Lands NW09/10	Reserved Matters		15/5550; 18/4422	20		396		
BSWSA4	SSA A5	Chanton House, 498 Sunleigh Road	Prior approval	Started	18/0418	26)			
n/a		Land Adjacent Wembley Stadium QED Stage 1 Part 2 Quintain ref E0102	Reserved Matters	Startod	15/5550; 17/0462	633				
11/ a	WAAP WIJ		Full Planning Per-		13/3330, 17/0402	033	,			
n/a	n/a	Winchelsea Road, Stonebridge Site 29/30	mission	Started	16/0760	178				
11/ 0		SK Phase 3a 4-26 Stuart Road / 5-9 Chippen-	Full Planning Per-		10/0/00	1/0	,			
n/a	n/a	ham Gardens	mission	Started	16/1191 & 18/4071	-12		52		
			Full Planning Per-							
n/a	n/a	Car Park Brondesbury Road	mission	Started	16/1947	24	ŀ			
n/a	n/a	291 High Road	Prior approval	Started	16/2689	10)			
			Full Planning Per-							
n/a	n/a	Warranty House, Dudden Hill Lane	mission	Started	16/4010	136	;			
			Full Planning Per-							
n/a	n/a	SK Phase 3a Peel Precinct	mission	Started	16/4174; 19/3259		38			
			Full Planning Per-							
n/a	SSA A7	Mount Pleasant/Beresford Avenue	mission	Started	16/4478	135				
			Full Planning Per-							
n/a	n/a	750-756 Harrow Road	mission	Started	16/4565	17	·			

Draft Brent										
Local	SSA / WAAP		-					2022-	2023-	
Plan ref.	ref.	Address	Туре	Status	Planning App Ref#	21	22	23	24	25
		All units 4-9, Gladstone Parade and garages rear of 4-9, Gladstone Parade, Edgware Road,	Full Dianning							
n/a	n/a	Cricklewood, London	Permission	Started	17/0298; 18/4777		38			
Πλα			Full Planning		17/0258, 18/4777		50			
n/a	n/a	Longstone Avenue	Permission	Started	17/2516		149			
11/ 0					172310		113			
n/a	WAAP W19	Land Adjacent Wembley Stadium QED Stage 1	Full Planning	Started	15/5550 & 17/0016;		458			
n/a	n/a	39 Waterloo Road	Prior approval	Started	17/3698	11	L			
			Full Planning							
n/a	n/a	79-83 Kenton Road	Permission	Started	17/3717; 20/2164	36	5			
n/a	n/a	Barclay House, The Stadium, Oaklands Road	Prior Approval	Started	17/4252 & 18/0020	25	5			
n/a	n/a	18 Iron Bridge Close	Prior approval	Started	17/4346	10)			
n/a	WAAP W16	1 Olympic Way	Prior approval	Started	17/4538 & 19/0395	150	77 (119		
n/a	n/a	6-10 Hallmark Trading Centre, Fourth Way	Prior approval	Started	17/4679	12	2			
n/a	n/a	York House Empire Way	Prior approval	Started	17/3856 and 19/0073	369	Ð			
			Full Planning							
BCSA6	WAAP W26	Parkwood House, Albion Way	Permission	Started	17/2782	113	3			
			Full Planning							
BCSA6	WAAP W26	10 & 11 Watkin Road	Permission	Started	18/3381; 19/2750		229			
		Units 1-5 Inc, Cannon Trading Estate, First	Full Planning							
BCSA9	WAAP W28	Way, Wembley	Permission	Started	17/3797	269	Ð			
			Full Planning		/					
BEGA1	n/a	60 Neasden Lane	Permission	Started	17/2477			121		
	55A 45		Full Planning	Charles I	10/2102		104			
BNSA3	SSA 16	Parking Land East of Morissons	Permission	Started	18/2183		194			
	n / 2	206 200 High Dead	Full Planning	Startad	15/2505		,			
BSSA12	n/a	296 - 300 High Road	Permission	Started	15/2595	8	5			
BSSA3	n/a	Church Road	Full Planning Permission	Started	13/1098			17	17	,
DJJKJ		Catalyst land 235 & Land in Church Road Car		Started	13/ 1030			1/	1/	
BSSA3	n/a	Park rear of 205-235 Church Road	Permission	Started	13/2213			30	35	
BSSA6	n/a	Wembley Point	Prior approval	Started	18/3125		439			
DJJAU	μηα	weinsicy rollic		Started	10/ 5125		+33			

Draft Brent										
	SSA / WAAP ref.	Address	Туре	Status	Planning App Ref#	2020-21	2021-22	2022-23	2023- 24	2024-25
rian ren.	WAAP ICI.		Reserved	Status		2020-21	2021-22	2022-23	27	2024-23
15/5550	WAAP W19	Part 2 E03A/B	Matters	Part complete	15/5550 & 17/0016	426				
<u> </u>		· · ·	Full Planning Per-	•						
BSWSA1	SSA A2	Minavil House and Unit 7 Rosemont Road	mission	Started	16/2629		251			
			Full Planning Per-							
BSWSA6	SSA A7	Afrex House/Ambassador House		Started	18/0752			31		
			Reserved		10/0001					0.00
BSWSA7	SSA A8	Northfields Industrial Estate	Matters	Started	18/0321					262
BSWSA7	84 422	Northfields Industrial Estate	Full Planning Per- mission	Started	18/0321		200	200		
DJVJAJ			Full Planning Per-	Started	10/0321		200	200		
BSESA10	n/a	SK Phase 4a Neville/Winterleys	mission	Not started	18/4920	-72				
			Full Planning Per-							
BSESA3	n/a	SK Phase 4 Carlton House	mission	Not started	18/4920	-16				
BSESA31	n/a	Turpins Yard Industrial Estate	Prior approval	Not started	17/1977	1	2			
	,	•	Full Planning Per-							
BSWSA4		82 Sunleigh Road	mission	Not started	18/0320		7			
Harles-			Full Planning Per-							
den NP	n/a	164 Harlesden Road	mission	Not started	19/4357			8		
18/1446	n/a	Jubilee House, Townsend Road	Prior approval	Not started	18/1446		12			
			Full Planning Per-							
19/1305		Preston Library, Carlton Avenue East	mission	Not started	19/1305				12	
			Full Planning Per-							
18/4716	n/a	133 - 137 Kilburn Lane	mission	Not started	18/4716		-2	14		
10/2204	CCA 14		Full Planning Per-		16/2204-20/4564			10		
16/3294	SSA 14	Clock Cottage	mission	Not started	16/3294; 20/1561			13		
19/2378		Granville Centre, 80 Granville Road	Full Planning Per- mission	Not started	19/2378					18
								10		10
20/0881	n/a	3 Cambridge Avenue	Prior approval	Not started	20/0881			19		
17/1104	550 03 2	253a Ealing Road	Full Planning Per- mission	Not started	17/1104		20			
17/1104	55A AJ.2		Full Planning Per-		1//1104		20			
BSWSA12	n/a	Keelers Service Centre, Harrow Road, Wembley	-	Not started	18/3069		22			
			Full Planning Per-							
BSSA13	n/a	Learie Constantine Centre	mission	Not started	19/1095			26		

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Draft Brent										
	SSA / WAAP ref.	Address	Туре	Status	Planning App Ref#	2020-21	2021- 22	2022-23	2023-24	2024- 25
		Flats 1-17 INC and 18 Prospect House, North Cir-	Full Planning Per-	Status		2020-21		2022-25	2023-24	25
17/0637		cular Road	mission	Not started	17/0637			28		
			Full Planning Per-							
BSSA10	n/a	Former Dudden Hill Lane Playground	mission	Not started	19/2688			29		
		2A Preston Waye and 283,285 and 287 Preston	Full Planning Per-							
11/1042	n/a	Road	mission	Not started	18/4902			31		
BSSA1	n/a	Units 29, 30 & 31 Cygnus Business Centre	Prior approval	Not started	18/2278		34			
18/2120	n/a	Empire House	Prior approval	Not started	18/2120 & 19/1973		38			
		Heron House, 109-115 Wembley Hill Road,	Full Planning Per-							
16/4156	n/a	Wembley	mission	Not started	16/4156			40		
			Full Planning Per-							
BESA1	n/a	6 & 6a Coombe Road	mission	Not started	18/2984			42		
			Full Planning Per-							
17/1829	n/a	The Willows Honeypot Lane	mission	Not started	17/1829; 19/1350			43		
	,				47/2224			24		
Harlesden	n/a	Manor Park Road, Acton Lane	Full Planning Per-		17/2331		24	21		
10/0210	n /n	The Ouesnehum, 110 Malm Lens	Full Planning Per-		19/0210			40		
18/0210	n/a	The Queensbury, 110 Walm Lane	mission	Not started	18/0210			48		
BSWSA15	n/a	Trinity House, Heather Park Drive	Full Planning Per- mission	Not started	15/5564			50		
17/3789	liya	3 Olympic Way	Prior approval	Not started	17/3789	60	<u> </u>			
1//3/09		Stonebridge Primary School Annexe, Twybridge	Full Planning Per-		1//5/05	00				
16/0073	n/a	Way	mission	Not started	16/0073; 18/4810			67		
10/00/3			Full Planning Per-					07		
BSESA25	n/a	St Paul's Avenue	mission	Not started	17/5291			70		
16/3408	n/a	Raglan Court & Garages Empire Way Blocks 1 & 2	Full Planning Per-	Not started	16/3408	40	32			
	-		Full Planning Per-							
16/3606	SSA A3.2	245-249 Ealing Road	mission	Not started	16/3606			92		
			Full Planning Per-							
BSWSA3	SSA A4	Remainder of Atlip Road site	mission	Not started	15/2061				110	110
	WAAP	Land, garages, alleyway rear of 416-444 High	Full Planning Per-							
BSWSA8	W3&W4	Road	mission	Not started	18/3111			256		
			Full Planning Per-							
BSWSA1	SSA A1	Alperton House, Bridgewater Road	mission	Not started	18/4199			113	247	114

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	SSA / WAAP		-			2020.24	2024 22		2022.24	2024.25
Plan ref.	ref.	Address	Type Full Planning	Status	Planning App Ref#	2020-21	2021-22	2022-23	2023-24	2024-25
BSESA27	n/a	Strode Road	Permission	Awaiting S106	18/3019			15		
BSWSA1			Full Planning					13	, 	
	n/a	Transputec House	Permission	Awaiting S106	18/0284			36	5	
17/2284		381A-D INC, 381-397 INC and 13-20 Park Parade	Full Planning	Awaiting S106	17/2284				110	
		2A, Part of Former Westend Saab and Boyriven	Full Planning		40/4544					
BSWSA1	SSA AZ	Textile	Permission	Awaiting S106	19/4541		124			
BSWSA5	SSA A6	Woodside Avenue	Full Planning	To be Deter-	20/1096			14	L	
20110,10				To be Deter-						
BSWSA8	WAAP W3&W4	Ujima House	Outline	mined	19/3092				54	
BESA3	n/a	Gower House School (SHLAA) AKA 5 Blackbird Hill	Full Planning	To be Deter-	20/2096			57	1	
	-	Complete Marcheves 8 Adjeining Algertan		To be Deter-	20/1002					
BSWSA1	11/ d	Carphone Warehouse & Adjoining Alperton	Full Planning	To be Deter-	20/1683			80		
BCSA7	n/a	wembley park station (SOUTH)	Full Planning	To be Deter-	20/0967					152
		Land at 370 High Road and 54-68 Dudden Hill	Full Planning	To be Deter-						
BSSA4	n/a	Lane	Permission	mined	18/3498					245
BSWSA9	WAAP W5	Demolished Ark Elvin Site, Wembley High Road	Full Planning	To be Deter-	15/3161, 19/2891				250	
BCSA9	WAAP W28	Access Storage	Full Planning	To be Deter-	18/4767				150	150
000/10										100
BNSA1	n/a	1-8 Capitol Way Industrial Park	Full Planning	To be Deter-	17/0837; 19/4545				201	180
BCSA4	WAAP W27	Euro House Fifth Way	Full Planning	To be Deter-	20/2033				450	
BNWGA1	55415	Land adjacent to Northwick Park hospital	Full Planning	To be Deter-	20/0701		218	218	218	
DIVUGAL	JUNE	QED North East Lands - Stadium Retail Park			20/0/01		210	210	210	
BCSA8	WAAP W18	NE01/02/03	Outline	No Progress	15/5550					550
		26-28, 42, 42A-D & land, Dudden Hill Lane, Lon-		To be Deter-						
BSSA8	n/a	don, NW10	Pre-App	mined					24	
				To be Deter-						
BSWSA1	SSA A1	Alperton Bus Depot, 330 Ealing Road	Pre-App	mined				324		

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Local Plan	SSA / WAAP									
ref.	ref.	Address	Туре	Status	Planning App Ref#	2020-21	2021-22	2022-23	2023-24	2024-25
BSESA8	n/a	SK Phase 3b Hereford & Exeter	No progress	No Progress			-167			
BSESA5	n/a	SK Phase 6 Craik	No progress	No Progress					-78	
		SK Phase 3b Woodsworth & Masefield (new school								
BSESA12	n/a	site)	No progress	No Progress					-40	
BSESA11	n/a	SK Phase 3b Old Granville Open Space	No progress	No Progress				20		
	Small Sites Windfall						220	209	297	332
					Total	3872	3049	3074	2057	2250

Note: The 5 year housing land supply shown above was last updated in August 2020 (outside of the 19/20 monitoring year) and is taken from the Housing Trajectory submitted as a Post Submission Document for Examination as part of the examination process of the drat Brent Local Plan.

Target is 12,338 (5 year Intend to Publish London Plan + 5% buffer). The trajectory identifies delivery of 14,302 dwellings, equating to 5.85 years supply.