**Small sites Delivery Assumptions in the Brent Local Plan.**

**Response to the request for the Local Plan Inspectors to explain and justify small site windfall allowance identified in the housing trajectory for the Local Plan period 2019/20-2040/41.**

**December 2020**

**Summary:**

* 1. The Council used the West London Small Sites SHLAA November 2018 (evidence base EB\_H\_07-09) to support its projected small-sites windfall allowance over the Plan period. Arising out of the examination hearings the Inspectors sought additional clarity from the Council to justify and explain the small sites windfall allowance identified in the housing trajectory that supports the Local Plan. Having considered this further, the Council now proposes to use the London Plan small sites windfall methodology to identify supply for the Plan period. This is due to the fact it is simpler, more transparent and has been found sound as a mechanism for identifying Brent’s likely small site windfall delivery. These are considered important factors in addressing a request from the Inspectors within hearing sessions for the Brent Local Plan to identify neighbourhood area housing targets.

**Brent Local Plan small sites windfall assumptions background**

* 1. In the draft Brent Local Plan Regulation 19 version (November 2019) the Council used the outputs of the West London Small Sites SHLAA November 2018 (evidence base EB\_H\_07-09) to support its projected small-sites windfall allowance over the Plan period. It had commissioned this evidence in association with some boroughs within the West London Alliance (London Boroughs of Barnet, Ealing, Harrow, Hillingdon and Hounslow). This work was in response to the original draft London Plan December 2017 which identified a small sites windfall target of 10,230 dwellings in the period 2019/20-2028/29.
	2. The West London Small Sites SHLAA set out an alternative methodology. It undertook a more detailed analysis of the historic trends of small site development locally specific in Brent and opportunities available. It also interviewed local developers to get an understanding of the capacity of the development industry to increase outputs consistent with the assumed London Plan delivery rates. The outputs of this study identified a stepped approach to delivery, reflecting the need for a more positive policy background to be in place to support planning permissions and also the ability of the building sector to respond to the opportunity. For the period 2019/20-2028/29 this identified likely delivery within Brent of 3,728 dwellings. For the years 2029/30-2040/41 a delivery of 469 dwellings per annum was identified, or 5,628 dwellings. Over the Plan period this would total 9,356 dwellings. The Council took these figures and used them in its housing trajectory showing how dwellings from this source would be delivered over the Local Plan period to achieve the Plan’s target. To avoid potential double counting, it subtracted dwelling numbers from site specific ‘major’ developments of 25 dwellings or less it had identified in the trajectory from each respective year’s windfall allowance.

**Revised London Plan small sites windfall capacity**

* 1. The small sites capacity was subsequently revised in the Intend to Publish London Plan issued in December 2019 as a result of the Examination Panel’s recommendations. This version of the London Plan identified a minimum target for Brent of 4,330 dwellings in the period 2019/20-2028/29 as a component of the wider minimum housing target for the borough from all sites of 23,250 dwellings. On an annual basis this is equivalent to 433 dwellings per annum, or over the Local Plan period of 22 years it would be 9,526 dwellings.

**Difference between West London small sites windfall SHLAA and London Plan small sites figures**

* 1. Overall, the Council’s use of the West London SHLAA small site windfall assumption resulted in 170 fewer dwellings identified as being delivered from small site windfalls over the Local Plan period in the trajectory than if the London Plan methodology was used. In the context of the overall delivery for the Brent Local Plan period identified in the latest trajectory of 46,018 dwellings, the number is very small.

**Neighbourhood Areas housing targets and small sites windfall allowance.**

* 1. Consistent with the London Plan Examination Panel Report recommendations paragraph 4.2.4 of the Intend to Publish London Plan identifies “The small sites target can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect required by paragraph 70 of the National Planning Policy Framework of 2019.”
	2. In accordance with the National Planning Policy Framework paragraph 65, the Council has been asked to provide neighbourhood area housing targets within the Brent Local Plan. This will involve identifying likely housing delivered from small site windfall capacity in addition to larger allocated sites.
	3. Whilst the Council considers the West London small sites SHLAA robust, application of its methodology to determine a small sites windfall target for neighbourhood areas will be much more complicated than that of the methodology used for the London Plan target. This is due to different multipliers being applied to different years from adoption of the London Plan and also to different capacity types. In addition, as set out the London Plan methodology has already been found sound at examination, whereas use of the West London SHLAA methodology has not.
	4. To aid transparency and understanding and reduce potential challenge over the methodology of how the neighbourhood targets have been derived, the Council proposes to now use the London Plan methodology to determine the number of small site dwellings that will come forward.

**Move to London Plan small sites allowance within the Brent Local Plan Housing Trajectory.**

* 1. For consistency the Council will also change the focus within its housing trajectory supporting the Brent Local Plan targets on small site windfalls from the West London methodology to that of the London Plan. This results in the housing trajectory in the first 10 years of the Local Plan 2019/20-2028/29 delivering an additional 602 dwellings (4330-3728), whilst for the 12 years of 2029/30-2040/41 it would reduce by 432 (5,196-5,628) but for the whole plan period when adding the two together would result in an additional 170 dwellings. The Council has been able to identify a significant buffer in its housing trajectory over the first 10 years of the Plan compared to the London Plan requirement. As such it no longer has such significant concerns around using the London Plan methodology as it had when that methodology was identifying a target/likely supply of 1023 dwellings per annum.

**How the capacity from specific small sites identified within the housing trajectory is dealt with when taking account of the likely capacity from all small sites.**

* 1. Within the trajectory, most years have specific sites that although identified could be categorised as small sites. For example BSESA29 Willesden Telephone exchange has a capacity of 20 dwellings indicatively identified for delivery over four years of 5 dwellings a year. As it is a small site, for each year, its anticipated delivery is removed from the respective year’s small sites allowance e.g. 2034-35 the 5 dwellings is subtracted from 433 dwellings for that year. As this is the only small site identified for delivery in that year, it results in a windfall allowance of 428 for 2034-35. Across the whole plan period 613 dwellings from identified sites have been subtracted from the London Plan small sites capacity target of 9,526 dwellings, which leaves 8,913 dwellings assumed to be delivered from small site windfalls.
	2. Further review of the spreadsheet formulas that generated the housing trajectory supplied for the examination hearings aimed at dealing with removing potential ‘double counting’ has identified that they were not working correctly. They were subtracting too many sites, resulting in lower levels of delivery from this source than should have been the case. This has now been remedied.