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Submission in respect of Brent Local Plan 2019

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Preamble

Brent is to be commended for subscribing to ambitious housing delivery targets, for adopting a positive approach to development, and for accepting the general thrust of the New London Plan. However, Brent's specific deviation from GLA assumptions in respect of development on small sites, and its resulting policy stance on such developments, does not appear to be soundly formulated, and may impede the achievement of other policy objectives.

In the context of a growing and changing city, the New London Plan argues that it is no longer justifiable or equitable that low density, 'Metroland' era suburbs remain indefinitely fossilised in the form in which they were created almost a century ago. Policy H2A of the London Plan recognises that the local character of such areas should be 'allowed to evolve over time to provide new homes.' The Brent Local Plan carefully avoids acknowledging the significance of this shift and seeks, by subtle but potentially effective means, to continue to inhibit the delivery of infill residential development within the low density residential suburbs.

Housing Delivery Targets on Small Sites

Brent disagrees with increasing the delivery of housing units on small sites from 260/annum to 1023/annum. Past experience is cited as evidence in support of this stance: Paragraph 6.2.17 argues that the Brent policy context to date was 'generally supportive of small site delivery,' resulting in the delivery of 260 new homes per annum.

A review of historic Brent planning applications reveals that almost none of these new homes were specifically consented on suburban / metroland infill sites. Indeed, very few applications were even received by the council compared to other Boroughs with a similar suburban context, which reflects the chilling effect of previously restrictive policies such as CP17.

This past experience, based on policy presumptions which specifically restricted development across the majority of the land area of the Borough, therefore does not represent reliable evidence as to the capacity of small sites in the Borough in a future, more permissive policy context. Indeed, the watering-down of the London Plan policy H2A as translated into Brent policy BH4 will undermine attempts to achieve the targeted delivery from small sites.

Brent's proposed deviation from London Plan targets for small sites deviates from regional planning policy without sufficient justification and hence represents a threat to the soundness of the plan.

London Plan Policy H2A v Brent Local Plan Policy BH4

London Plan Policy H2A establishes a presumption in favour of 'residential conversions, redevelopment, extensions of houses and/or ancillary residential buildings or infill development within the curtilage of a house, where it is within PTALs 3-6 or 800m distance of a station or town centre boundary.' Brent Plan Policy BH4 seeks to restrict this presumption to areas of PTAL 3-6, removing the 800m radius from stations and town centre boundaries.

This subtle deviation from the letter of London Plan policy significantly subverts its spirit. The effect of this approach is to reduce by over 50% the suburban area where this policy is applicable, frustrating the intention of the policy. The maps attached to this submission offer a visual representation as to the effect of this policy, overlaying PTAL 3-6, 800m station radii, and discounting conservation areas which are in any case excluded from the permissive principle.

The justification for this deviation from London Plan policy, as set out in Paragraphs 6.2.50 and 6.2.51, is deficient in several respects.

The council seeks to define the suburban context and conditions in the northern part of the borough (non town-centre rail stations with low quality local links) as in some way exceptional to a wider norm, when in fact these conditions are found across all outer London boroughs. The GLA would have been perfectly familiar with such conditions when formulating policy. Indeed, the 800 metre radius from train stations and town centres has been established as a compromise in place of previous proposals for a more widely permissive policy, and achieves a perfectly reasonable balance between encouraging sustainable suburban intensification and discouraging unsustainable travel patterns.

Brent's attempt to set a higher bar 'to only apply where there are genuine reasonable public transport alternatives that could realistically encourage people to not own/ use a car on a frequent basis' (paragraph 6.2.51) is arbitrary and fails to recognise the value of close geographic proximity (walking distance) to one of the borough's circa 27 high quality rail stations or urban centres which is already embedded in London Plan policy.

The council criticises H2A as a 'blunt tool' but replaces it with an equally blunt alternative. Any attempt to deviate from London Plan policy in this area should only be presented as a local exception rather than a borough-wide exemption, and must be informed by specific local evidence as to why the 800m permissive radius should not apply to a specific station or centre.

In summary, the justification for deviating from the London Plan:

- a) fails to distinguish between small sites of different types and contexts
- b) seeks to perpetuate past policies which insulate the residential suburbs in their generality from any change or intensification
- c) attempts to drastically curtail the areas where the newly permissive regime will apply
- d) rests on an arbitrary change to qualifying parameters which is not supported by evidence

And therefore falls short of the standard of soundness required of this Plan.

Other Policy Considerations

Family Sized Units

Paragraph 6.2.10 notes that family size units (3 bed+) account for more than half of housing demand in the borough (53%). Policy BH6 reflects this reality by requiring that at least 25% of new homes should be family sized units, and specifically recognises that 'Brent's suburban context provides opportunities for houses as well as flats.' However, this ambition will be notably difficult to achieve given market realities and the high densities proposed in respect of the majority of site allocations, growth areas and intensification corridors. By contrast, small infill sites, suitable for the construction of individual 3-4 bedroom homes, offer an effective means of increasing the supply of this type of

unit. Failure to identify and promote realistic and deliverable opportunities to deliver family sized units undermines effectiveness and represents a threat to the soundness of the plan.

Amending Brent's policy BH4 to reflect a positive and permissive approach to small sites across the residential suburbs will assist in achieving the objective of BH6. It may even be desirable to extend the permissive principle to a wider geographic area than envisaged under H2A to improve effectiveness of delivery.

Self- and Custom-Build

The council notes its statutory duty to support self- and custom-build, but has not followed this statutory duty with an active commitment to encouraging such developments. The brownfield register by its nature does not capture many of the smaller, privately owned, domestic scale plots, generally in suburban infill settings, which are highly appropriate to small-scale self build projects.

Amending Brent's policy BH4 to reflect a positive and permissive approach to small sites across the residential suburbs will assist in improving the availability of plots suitable for the self- and custom-build market.

Fairly distributing the effects of development

An increasing population should be seen as an opportunity to leverage development to the benefit of both existing and future residents, as increasing densities across the existing built area can support improved provision of social, sporting, cultural and transport facilities. However, the soundness of the plan is potentially compromised by broader questions of fairness in where and how change and development are accommodated.

According to Policy BH1, the overwhelming majority of housing delivery is to be focused in Development Areas (comprising site allocations, growth areas and intensification corridors) which represent only a small fraction (12-15% by estimate) of the total land area of the borough. The fraction of residents proximate to these areas are therefore asked to bear the full burden of dramatically increased density, while those privileged enough to already dwell at a density of 12 houses to the acre are insulated from all change; the latter cohort substantially comprises private owner-occupiers whereas the former include a greater proportion of renters and residents of HMOs. The evidence base is potentially deficient in that the Inclusive Growth Strategy and the Equalities Impact Assessment neither identify nor justify such embedded inequity, undermining the soundness of the plan.

Amending Brent's policy BH4 to reflect a positive and permissive approach to small sites across the residential suburbs may assist in social cohesion and spreading the effects - and benefits - of development more equitably across all of the borough.

Changes in residential density

While some parts of the borough face challenges of overcrowding and excessive intensification of occupation due to subdivision, 'beds-in-shed,' etc, decreasing average household size in the context of a fixed stock of housing in some more affluent areas means that population density within many established residential suburbs is actually falling, resulting in less effective use of existing community infrastructure and assets. CSO mapping of intra-census changes in residential density at local level should form part of the evidence base for this (and many other) policies, but does not appear to

have been included in the published evidence base. Failure to take account of such statistical data represents a threat to the soundness of the plan.

Amending Brent's policy BH4 to reflect a positive and permissive approach to small sites across the residential suburbs may improve utilisation of existing public infrastructure and assets and contribute to the social sustainability of existing communities.

Positively enabling development

Hundreds of garage, corner and side garden plots exist across the Borough, many with the potential to accommodate one or two residential units without detriment to protected garden land or residential amenity. However, the investment of time and effort required to bring such sites forward for development is considerable, and easily outweighed if subjected to the zealous application of the entire gamut of planning policies devised with larger developments in mind.

Positive reference should be made to principle of appropriately designed, small scale infill development on sites across the Borough, which can improve housing mix and choice without detriment to the character of local residential areas. To provide greater clarity and assist in unlocking the potential of small plots around the Borough, the council should create specific design guidance to define acceptable patterns of development which acknowledge the sensitivity and character of the context where these developments are likely to come forward.

Policy BH4 should commit the council to generating supplementary planning guidance on this matter in the near future to improve the effectiveness of the plan.

Site allocations process

The approach to identifying and allocating housing sites avoids the conventional suburban typology. The London Plan small-sites targets would be more achievable if this typology had been investigated more closely, such as examining the redevelopment of mews-lane garage sites within the inter-war suburbs. The redevelopment of mews plots has become a standard and accepted pattern of development in housing of all previous periods: Georgian, Victorian and Edwardian. Subject to the application of appropriate design standards and the resolution of practical issues of carparking on narrow lanes, the development of mews sites throughout the interwar suburbs offers the opportunity to contribute significantly to housing supply in the borough over the plan period.

The allocations process should seek to identify at least one suitable area where such a mews lane development could be permitted under the plan, as a test-bed for future rounds of allocations, and as a means to improve the effectiveness of the plan.