

Neighbourhood Forum Housing Requirement

Action: Write a short report to state a housing requirement for the Neighbourhood Areas which expresses compliance with NPPF paragraph 65. It was mentioned to express this as a minimum.

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Introduction

The Brent Local Plan was subject to Examination in Public hearings sessions for three weeks, from 29th September 2020, to 16th October 2020. During this process, the Inspectors assessed whether or not the Brent Local Plan met the test of soundness. It was identified that in order to make the Plan ‘Sound’, the plan needed to meet the requirements set out in paragraph 65 of the National Planning Policy Framework (NPPF). This states the following:

‘Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.’¹

This report therefore sets out how the Council has arrived at the identified housing requirement figures for the identified Neighbourhood Forum areas within its boundary.

Brent Context

Brent has three extant Neighbourhood Forum areas. These include Sudbury Town, Harlesden, and Kilburn. These are identified in Appendix A. A summary of the status of these neighbourhood forums is shown in Table 1 below.

Table 1: Neighbourhood forum description/ status

Neighbourhood Forum	Status (December 2020)
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. 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. According to LB Brent’s Local Development Scheme (October 2019), consultation on the draft Neighbourhood Plan is estimated to take place in early 2021.
Sudbury Town	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.

¹ Par 65 National Planning Policy Framework, MHCLG, 2019

As shown in the table above, both Sudbury Town and Harlesden have adopted Neighbourhood Plans. Kilburn does not. Table 2 below gives a snapshot of the size and composition of each Neighbourhood Forum Area. Harlesden and Kilburn expand into adjacent Local Planning Authorities, however, for the purposes of this exercise, the housing figures and data used regard those portions which reside solely within Brent.

Table 2: Neighbourhood forum area housing composition and constituent LPAs.

Neighbourhood Forum Area	Area within LB Brent (ha)	No. Dwellings	Detached/semi	Terrace	Flat	Constituent Local Planning Authorities
Harlesden	149.47	7382	1045	424	5835	LB Brent, Old Oak and Park Royal Development Corporation (OPDC)
Kilburn	64.74	4781	369	324	4042	LB Brent, LB Camden, City of Westminster
Sudbury Town	126.91	3107	1212	218	1671	LB Brent

Policy Context

As at January 2020, the most recent London Plan (the Publication London Plan, December 2020) has been through examination but has not yet been adopted. This has been reviewed by the GLA in accordance with the directions sent by the Secretary of State (SoS) on 13th March 2020 and 10th December 2020. This has been approved by the Mayor and is awaiting response from the SoS. As Brent is located within London, housing targets within the London Plan apply to Brent. Within the Publication London Plan (2020), Brent has been given both an overall housing target of 23,250 dwellings over the period 2019/20-2028/29² including a housing target for small sites (below 0.25 hectares in size) of 4,330 dwellings over the same ten-year period³.

Following the examination hearings of the draft Brent Local Plan, the Council has decided to accept the small sites windfall target methodology that was used to generate the small sites housing target for Brent as the determinant of the small sites capacity within Brent, rather than continuing to pursue the alternative West London SHLAA methodology which it had previously favoured.

Approach

The approach used to calculate the housing requirement for each Neighbourhood Forum area mimics that used for the London Plan to determine the borough-wide housing targets. This includes figures for both larger sites (greater than 25 dwellings/ 0.25ha, whichever is

² Table 4.1 of the Publication London Plan, GLA, 2020

³ Table 4.2 of the Publication London Plan, GLA, 2020

the greater), and small sites (those smaller than major sites). The process used in arriving at these figures is outlined below.

Methodology

In establishing housing figures for the Neighbourhood Forum areas, the Council has used the 'combined approach' as set out in London Plan Strategic Housing Land Availability Assessment (SHLAA) methodology 2017. This methodology was used to establish the small sites target for the borough as a whole. Therefore, for consistency, it is considered appropriate to replicate this process at a more granular level, to establish targets for individual areas within the borough.

This methodology uses a 'combined approach'. This includes the sum of two figures, one which has been reached via a modelled approach, and another which fills in the gaps using historical data ('remaining windfall'). These approaches are fully outlined in Chapter 6 of the London Plan SHLAA (2017).

It should be noted that the London Plan SHLAA methodology assumed that 1% of existing stock of houses would increase in density in areas which benefit from PTALs 3 to 6 or are within 800m of a tube station, rail station or town centre boundary. However, through the examination of the London Plan, the panel of inspectors felt that an annual growth rate of 0.3% was more likely to reflect the realistic output from small sites⁴. The council has adopted the 0.3% growth rate in calculating each Neighbourhood Forum area's housing requirements rather than the original growth rate proposed in the London Plan SHLAA (2017).

Following the 'combined approach' summarised above, the council has also assessed sites from its housing trajectory submitted for independent examination and from site allocations in the draft Local Plan to reach a total. Assessments have been made of these sites (site allocations of 25 dwellings or under, planning permissions of over 25 dwellings / 0.25ha, and site allocations of over dwellings / 0.25ha) to determine whether they should be added to the final total for each area, or whether they may have already been counted within the combined approach.

For clarify on how this process has been translated locally, a summary of the methodology used has been outlined below.

Modelled approach

This approach seeks to identify the most sustainable locations within an area, which under London Plan policy, would generally be suitable for residential intensification. This includes areas with a Public Transport Accessibility Level (PTAL) greater than 3, and/or areas within 800m of a tube station, railway station or town centre boundary (see Appendix B). This will enable a more accurate windfall figure to be planned for as a result of the step-change in policy toward delivery of housing in these areas. The actions which come together to produce this figure are summarised in Table 3 below.

Table 3: London Plan SHLAA prescribed actions for when arriving at small sites modelled figures and justifications.

Location	Action	Justification
Within 800m of a railway station or town centre, or	Assume increase of 0.3% annual across	Growth identified as reasonable assumption given policy push for intensification of small sites in these

⁴ Par 173 of the Report of the Examination in Public of the London Plan 2019, The Planning Inspectorate, 2019

PTAL 3+ (the defined catchment)	housing stock (see Appendix B)	areas. Justified within the panel of Inspectors' Report for the London Plan.
Semi-detached/detached houses	Increase growth within the defined catchment by 2.23	Account for increased capacity available at larger houses reflecting London wide trends. Justified by par 6.26 of the London Plan SHLAA methodology (2017).
Terrace houses	Increase growth within the defined catchment by 1.34	Account for potential capacity increases as is reflected within London wide trends. Justified by par 6.26 of the London Plan SHLAA methodology (2017).
Houses in conservation areas	Reduce growth identified above by 75%	Reflects protected status of conservation areas and associated limited growth potential. Justified by par 6.28 of the London Plan SHLAA methodology (2017).
Flats	Remove from growth assumptions	Already relatively high density which limits opportunity for intensification.
Commercial buildings	Remove from growth assumptions	Changes of use are accounted for within the 'remaining windfall' calculations (justified by par 6.35 of the London Plan SHLAA methodology (2017)).
Listed Buildings	Remove from growth assumptions	Reflects protected status and limited potential for growth. Justified by par 6.31 of the London Plan SHLAA methodology (2017).
Within Site Specific Allocation boundary	Remove from growth assumptions	Remove as already included within figures.
Developed post 2001	Remove from growth assumptions	Recently developed and therefore unlikely to contribute to growth over the Plan period. Justified by pars 6.32 and 6.33 of the London Plan SHLAA methodology (2017).
Estate Regeneration Schemes	Remove from growth assumptions	If applicable – remove, as would be counted within the Site Specific Allocations, or, if already developed post 2001, unlikely to contribute to growth over the plan period.

To acquire this data, the Council extracted all properties within the defined neighbourhood forum areas (as identified in Appendix A) from its property database. Using Geographical Information Software (GIS), the Council was then able to identify firstly if these properties fell within the 'defined catchment area', and secondly what type of dwelling they were. These figures were then cross referenced against data from the London Development Database (LDD) to identify if the properties had resulted from development which has taken place since 2001. With this data, and applying the actions listed in Table 3 the Council has arrived at the figures in Table 7.

Remaining windfall approach

Within the London Plan SHLAA (2017), remaining windfall trends are then added to the modelled results. These cover housing completions on other types of small sites which are not covered in the modelling. The remaining windfall element is based on annual trends in

net housing completions between 2008/09 and 2015/16⁵. The following steps were taken to calculate the remaining windfall element.

Table 4: London Plan SHLAA prescribed actions when arriving at remaining windfall figures, and justification.

Action	Justification
A record of residential completions was extracted from the old LDD system, for completions which took place between 2008/09 – 2015/16	In accordance with par 6.35 of the London Plan SHLAA methodology (2017).
Sites which delivered over 25 dwellings were removed	While not explicit in the SHLAA methodology, sites delivering over 25 dwellings would not be considered to be small sites and would therefore be excluded from the 433 dwelling small sites target
Housing completions from office to residential permitted development rights were removed. Other changes of use (including other types of permitted development rights) were not excluded, as the SHLAA Methodology retains changes of use and does not make explicitly whether other types of permitted development should be removed. Notwithstanding this, after the remainder of the filtering exercise had been completed, no other applications of this type remained anyway.	In accordance with par 6.35 of the London Plan SHLAA methodology (2017).
New build development where the proposed number of homes was 10 or fewer was removed	In line with par 6.36 of the London Plan SHLAA methodology (2017).
Residential conversions were removed	In line with par 6.36 of the London Plan SHLAA methodology (2017).
An exercise was then undertaken to correlate the remaining developments with the designated neighbourhood areas and removing schemes which did not fall into any of those areas	By virtue of the fact that this exercise is to produce minimum targets for these specific designated neighbourhood areas only
A sense check was undertaken on the remaining cases to check that they were eligible to be counted in accordance with the methodology. This included checking for / removing infill development within a residential curtilage	In line with par 6.36 of the London Plan SHLAA methodology (2017). This sense check was undertaken as the last step as it required checking descriptions of development for infill development or incorrect labelling / categorising, rather than undertaking a pure filtering exercise..
Finally, the total net completions for each designated neighbourhood area were divided by 8 (the number of years over which the completions were recorded) to calculate an annual average, and multiplied by 22 (the number of years in the plan period). The resultant estimated remaining windfall is shown in Table 8 below.	To produce an estimated total net remaining windfall amount of the plan period for each of the neighbourhood areas.

⁵ Chapter 6, The London Strategic Housing Land Availability Assessment 2017, GLA, 2017

Site Allocations of under 25 dwellings

A number of smaller site allocations within the draft Brent Local Plan and within the Harlesden Neighbourhood Plan fall within the neighbourhood forum areas. In order to ensure that such smaller sites have not been double counted within the modelled approach or remaining windfall approach above, an assessment has been made of each of the sites to determine whether they should be included within the final figure for each neighbourhood forum area.

Table 5: Site allocations of under 25 dwellings to come forward over the Plan period by Neighbourhood Forum area.

Neighbourhood Area	Site	Source	Net dwellings over plan period	Assessment	Conclusion
Harlesden	Harlesden Railway Generation Station	BSSA17 – draft Brent Local Plan	0	N/A	Exclude
Harlesden	Harley Road	Harlesden Neighbourhood Plan	7	Would have already been counted within the modelled approach: see par 6.36 (page 135) of SHLAA methodology	Exclude
Harlesden	Car Sales at Junction of High Street and Furness Road	Harlesden Neighbourhood Plan	5	Would have already been counted within the modelled approach: see par 6.36 (page 135) of SHLAA methodology	Exclude
Harlesden	Former Willesden Ambulance Station	Harlesden Neighbourhood Plan	8	Would have already been counted within the modelled approach: see par 6.36 (page 135) of SHLAA methodology	Exclude

Harlesden	Land at Challenge Close	Harlesden Neighbourhood Plan	10	Would have already been counted within the modelled approach: see par 6.36 (page 135) of SHLAA methodology	Exclude
Kilburn	Gaumont State Cinema	BSESA19 – draft Brent Local Plan	0	N/A	Exclude
Sudbury Town	Keelers Service Centre	BSWSA12 – draft Brent Local Plan	22	In accordance with par 9.22 of the SHLAA, this site would fall under the 'remaining windfall' capacity modelling. However, the remaining windfall calculations in Table 8 below show that there is no historic delivery of this type of windfall in Sudbury Town inclusion of this site would not be considered to be double-counting.	Include

Permissions of over 25 Dwellings / over 0.25 ha and Site Allocations of over 25 dwellings / over 0.25 ha Methodology (large sites)

In addition to the small site allocations assessed above, for each area, extant applications and site allocations within the defined boundaries of greater than 25 dwellings/ 0.25ha

(whichever is the greater) have been assessed to determine whether such sites would have already been accounted for through the combined approach. Combining these figures with those identified using the small sites methodology combined approach and assessment of sites under 25 dwellings will provide the final housing figures for each area.

Table 6: List of sites of over 25 dwellings / over 0.25ha to come forward over the Plan period by Neighbourhood Forum area.

Neighbourhood Area	Site	Source	Net dwellings over plan period / site area	Assessment	Conclusion
Harlesden	Harlesden Telephone Exchange	BSSA18 – draft Brent Local Plan	52 / 0.4ha	Would have been considered a large site under SHLAA methodology and therefore excluded from small sites combined approach	Include as a large site
Harlesden	Salvation Army and Manor Park Works	Harlesden Neighbourhood Plan	45 / 0.19ha	Would not have been considered a large site in SHLAA due to being less than 0.25ha, but would also not have been included within modelled approach or remaining windfall due to exceeding 25 units – therefore will not have already been counted anywhere.	Include as a large site
Harlesden	Harlesden Plaza	Harlesden Neighbourhood Plan	208 / 0.9ha	Would have been considered a large site under	Include as a large site

				SHLAA methodology and therefore excluded from small sites combined approach	
Harlesden	Knowles House, Longstone Avenue	Planning Application - 17/2516	149 / 0.48ha	Would have been considered a large site under SHLAA methodology and therefore excluded from small sites combined approach	Include as a large site
Kilburn	Kilburn Square	BSESA20 – draft Brent Local Plan	100 / 1.1ha	Would have been considered a large site under SHLAA methodology and therefore excluded from small sites combined approach	Include as a large site
Kilburn	1-2 Drakes Courtyard	Prior Approval - 17/4179	39 / 0.036ha	Would not have been considered a large site in SHLAA due to being less than 0.25ha but would also not have been included within modelled approach or remaining windfall due to exceeding	Include as a large site

				25 units – therefore will not have already been counted anywhere.	
Sudbury Town	Sudbury Town Station Carpark	BSWSA14 – draft Brent Local Plan	30 / 0.2ha	Would not have been considered a large site in SHLAA due to being less than 0.25ha but would also not have been included within modelled approach or remaining windfall due to exceeding 25 units – therefore will not have already been counted anywhere.	Include as a large site

Results

Modelling Results

Table 7 below shows the total number of dwellings, and their breakdown by dwelling type. Using the factor increases for detached/ semi-detached, and terrace housing for units within the defined catchment, this provides us with a gross figure for each Neighbourhood Forum area. The gross figure already excludes flats from any potential growth. The net total takes account of growth reductions for units within conservation areas, and the growth exemptions identified in Table 3. The figure for Kilburn is low due to the high proportion of flats, and the percentage of the area within conservation areas.

These figures will come together with the remaining windfall figures in Table 8 below to provide the small sites housing figures for each area. These figures will then be added to site allocation and planning permission figures in Tables 9 and 10, which represent unaccounted for site capacity identified in the housing trajectory, to provide an overall housing figure for each area.

Table 7: figures arrived at using the Modelled approach by neighbourhood forum area

Neighbourhood Forum Area	No. Dwellings	Detached/semi-detached	Terrace	Flat	Other (i.e. commercial)	Gross uplift	Net total
Harlesden	7382	1045	424	5835	78	8.6975	8.00535
Kilburn	4781	369	324	4042	46	3.7683	1.01975
Sudbury Town	3107	1212	218	1671	6	8.9924	8.7932

Remaining Windfall Results

Table 8: Figures arrived at using the remaining windfall approach by neighbourhood forum area.

Neighbourhood Area	Net total dwelling completions 2008/09 – 2015/16	Average net total dwellings per annum	Estimated net total dwellings over plan period
Harlesden	61	7.625	167.75
Kilburn	68	8.5	187
Sudbury Town	0	0	0

Site Allocations of 25 dwellings and under

Table 9: Figures for Site Allocations of under 25 dwellings which are not already encompassed within the small sites methodologies outlined above, by Neighbourhood Forum area.

Neighbourhood Area	Total Net Dwellings over Plan Period	Estimated number of dwellings per year
Sudbury Town	22	1

Permissions of over 25 dwellings / over 0.25ha and Site Allocations of over 25 dwellings / over 0.25ha

Table 10: Figures for large sites which are not encompassed within the small sites methodologies outlined above, by Neighbourhood Forum area.

Neighbourhood Area	Total Net Dwellings over Plan Period from Site Allocations and other developments of over 25 dwellings on Housing Trajectory	Estimated number of dwellings per year
Harlesden	454	20.63
Kilburn	139	6.32
Sudbury Town	30	1.36

Final figures

Table 11 below shows the breakdown of housing figures for each Neighbourhood Forum area. This shows how the final annual housing figures have been arrived at using the three methods outlined above. This includes the small sites figure, which is comprised of the modelled approach and the remaining windfall approach, and the figure for other sites, which is comprised of site allocations of 25 dwellings and under, site allocations of over 25 dwellings / over 0.25ha, and permissions of over 25 dwellings / over 0.25ha. . Extrapolating the annual housing figure over the length of the Plan period provides us with an overall housing figure for each area over the next 22 years.

Table 11: Final figures combining the modelled results, the remaining windfall, the Site Allocations of under 25 dwellings, Permissions of over 25 dwellings / over 0.25ha and Site Allocations of over 25 dwellings / 0.25ha

Neighbourhood Forum Area	Modelled	Remaining windfall	Other sites (combined)	Annual housing figures	Housing figures over the 22 year Local Plan period
Harlesden	8.01	7.63	20.63	36.27	797.94
Kilburn	1.02	8.5	6.32	15.84	348.48
Sudbury Town	8.79	0	2.36	11.15	245.37

Conclusion

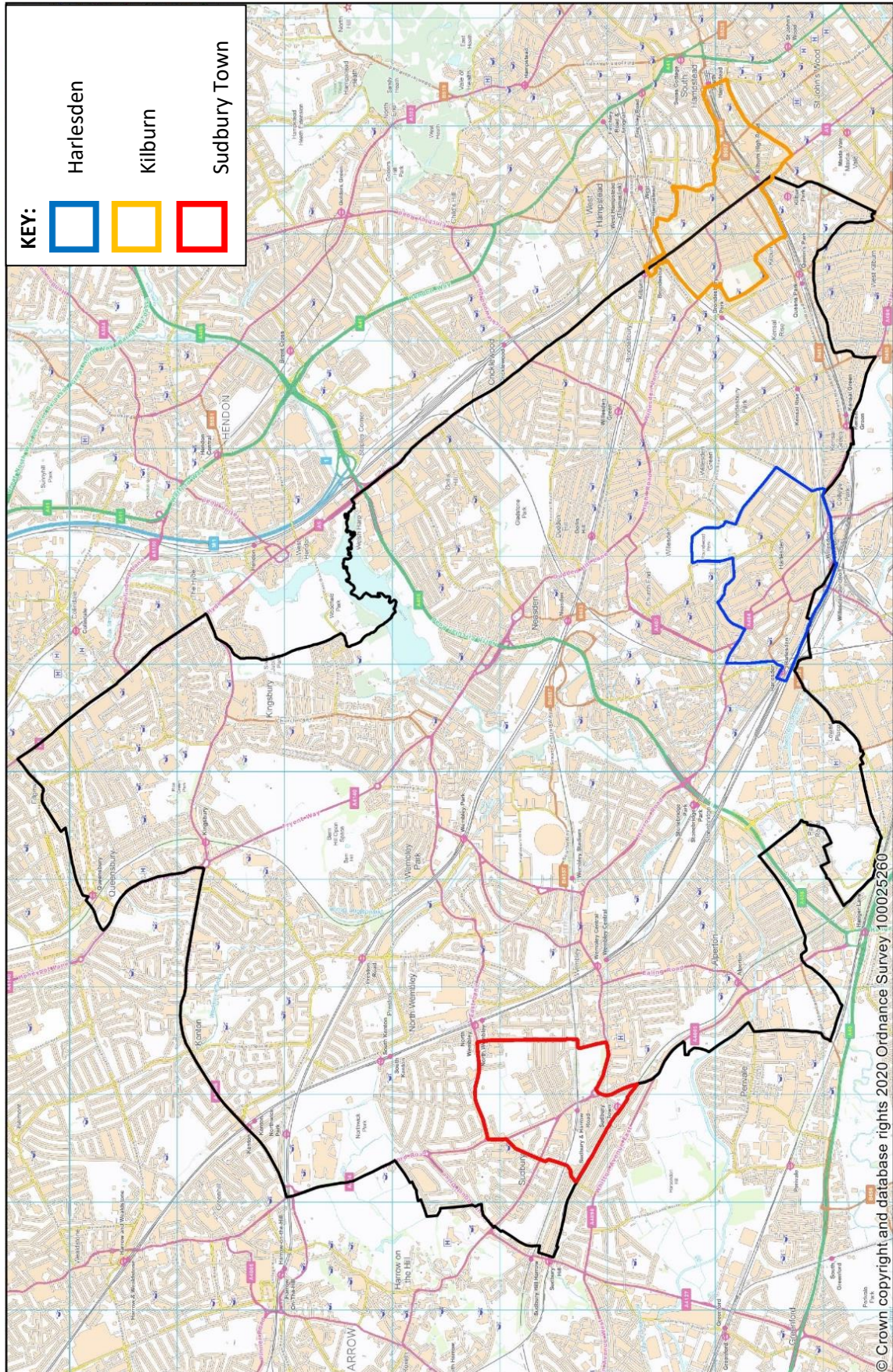
The Council has used the London Plan SHLAA (2017) methodology for producing housing figures for each of its designated Neighbourhood Forum areas, as is required under NPPF paragraph 65. This method has been approved by the panel of Inspectors for the London Plan, in conjunction with recommendations which arose out of representations from the West London Alliance, and has therefore been amended to reflect this.

Each of the Neighbourhood Forum areas are wholly within what the London Plan defines as an area appropriate for sustainable small site intensification. Under this policy guidance, intensification within these areas should be maximised where appropriate. The Brent Local Plan has sought to guide this development toward high PTAL areas, town centres, and intensification corridors. This will enable these areas to contribute toward meeting the Councils housing needs, whilst minimising impacts upon existing residents.

The figures listed in Table 11 reflect the Neighbourhood Forum areas' current housing composition, historic trends in housing delivery, and the new policy environment which will shape development over the Plan period. This figure still only represents the Council's best estimate, using data and established methodology to project housing delivery over the long term. Given the need for housing within Brent, and the significant housing target with which the Council has been set, these figures should be considered strictly as minimums. This has been advised by the Inspectors of the draft Brent Local Plan. As minimums, they should not impinge upon the Councils ability to meet its strategic housing targets sustainably.

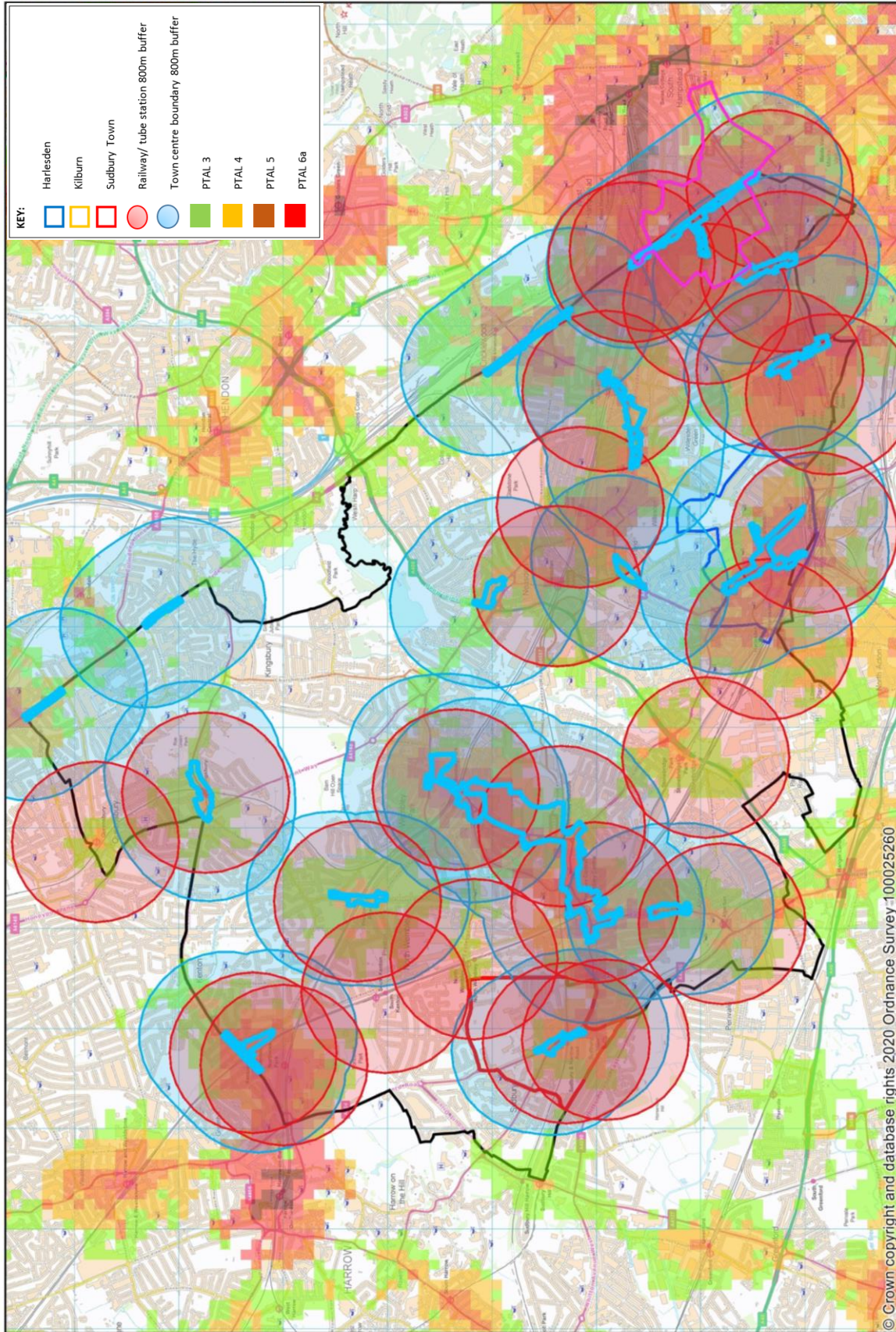
Appendix A – Designated Neighbourhood Forum area map

Brent designated Neighbourhood Forum Areas



Appendix B – Neighbourhood Forum sustainable catchment areas

LB Brent sustainable catchments



1:52000

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