

## Home Builders Federation

### Matter 8

## BRENTWOOD LOCAL PLAN EXAMINATION

### Matter 8 – Housing provision

***Issue 9 – Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy?***

#### Housing supply

101. Does the Plan set out a robust housing land supply that meets the identified needs? In particular:

a. Does the supply identify sufficient land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, in accordance with paragraph 68 of the NPPF?

Whilst this is for the Council to answer it is important that the Council can show there to be sufficient supply of small sites to accommodate at least 10% of the housing requirement. In line with national planning policy, it is important that the Council does more to actively identify and allocate small sites. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country, resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80% following the introduction of the planned system in 1990.

HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure with a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or else the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have. This is why the Government, through the NPPF, now requires local authorities to allocate more sites of varying sizes. It is therefore essential that the Council can show that this plan is in accordance with paragraph 68 of the NPPF.



b. Is there sufficient flexibility in the housing trajectory to ensure that housing land supply within the Plan area will be maintained and will deliver the housing requirement set out in Policy SP02?

The Council's evidence in document F5D indicates that the Council expected to deliver 8,502 new homes against a total requirement of 7,752. This provided a buffer of 750 homes, a little under 10% of the total.

However, we note that the Council has provided an updated trajectory in document F26. This sets out that the Council now expects to deliver 7,376 homes between 2016 and 2033 – some 376 homes short of its requirement. The Council has moved from having a buffer within its supply to ensure needs are met in full to having a deficit. The Council must seek to rectify this position and identify additional development to ensure needs are met in full. In addition, the Council must ensure that there is a sufficient buffer between its supply and requirements to ensure that minimum number of homes is delivered. This was necessary when the plan was submitted it remains the case.

The presence of a buffer is an assurance that supply is sufficiently flexible to ensure that needs are met in full. This is particularly important given the reliance towards the end of the plan period that the Garden Village. Between 2023 to 2033 the Garden Village comprises of 40% of all the homes to be delivered and in the last five years this increases to 66%. Whilst we do not have any concerns regarding the deliverability of this scheme there is always a risk with any strategic allocation that delivery will be delayed or slower than expected. As such in a plan that is relying so much on just one development to ensure needs are met in full, we would expect to see a significant buffer of around 20%. Only this degree of buffer will provide the necessary certainty that needs will be met in full and ensure there is flexibility within overall supply across the plan period.

c. Is there credible evidence to support the expected delivery rates set out in the housing trajectory? In particular, with 679 total completions for the period 2016/17 to 2019/20, this means that around an average of 544 completions per year would have to be achieved from 2020/21 to the end of the plan period to meet the 7,752-unit housing requirement. This is a significant rise in house building rates from recent and historic trends in the borough. Does the evidence support that this can be achieved?

It would appear from the Council's latest trajectory that they now no longer consider it possible to deliver 7,752 units across the plan period. Between now and the end of the plan period the Council will deliver on average 527 dpa and as such cannot show a five-year housing land supply for each year in the plan period. It also indicates why it is important to have a substantial buffer in order to ensure needs are met in full.

## Five-year housing land supply

### 102. Is a five-year housing land supply clearly demonstrated? Is it based on robust evidence and is it justified?

The Council state that they will have a housing land supply on adoption of 6.27 years. However, this assessment does not appear to include any assumptions, in the first five years or across the remaining plan period, in relation to the backlog in delivery between 2016 and 2020. The only way the Council can achieve a 6.27-year land supply on adoption is if they have assumed a zero backlog in supply as of 2021 – which would appear to be the case based on table 1 in F26.

Contrary to the Council's position using a flat trajectory of 456 dwellings per annum across the whole plan period and the supply assumptions in F26 there is a backlog of 1,227 dwellings on adoption. Using this latest trajectory, it can be seen in table one below that the Council's five-year land supply on adoption will be 4.08. This is using the Sedgefield methodology, as required by paragraph 68-031 of Planning Practice Guidance (PPG), which requires the Council to address backlog within five years and with a 20% buffer as indicated is necessary by the latest Housing Delivery Test measurements. Therefore, based on the Council's latest estimates of supply in F26 the Council can only show a land supply of 4.08 years on adoption. As such they will need to find additional supply to address the identified shortfall.

Table 1: Brentwood Five-year housing land supply on adoption

Base five-year requirement 2021/22 to 2025/26	2,280
Backlog 2016/17 to 2020/21	1,227
Total 5-year requirement 2020/21 to 2025/26	3,507
Buffer applied (20%)	4,207
Supply 2021/22 to 2025/26	3,430
Surplus/shortfall	-778
Years supply in first five years	4.08

However, what is most concerning is that the Council cannot show a five-year land supply in future years. This can be seen in the rolling five-year housing land supply assessment as attached to our statements at appendix 1. The only approach for the Council to take is to identify further sites that will deliver more homes in the first five years of this plan. Not only will this ensure the Council will have a five-year land supply on adoption but provide an increased buffer with regard to overall delivery.

### **Other housing policies**

(Policies HP01-HP04 and HP06)

#### Policy HP01 Housing mix

### 103. Does the policy, and the Plan as a whole, adequately address the needs of different groups in the community in accordance with paragraph 61 of the NPPF?

No comment

104. Criterion A a i of the policy requires a housing mix as set out in the SHMA or similar evidence. The supporting text provides more detail on the mix being sought, but also states that this will be subject to negotiation. Does this approach provide sufficient flexibility concerning the mix of house types and sizes to allow reactions to market forces and updated local needs evidence?

No comment

105. Criterion A a ii of the policy requires that on residential sites of 10 or more new dwellings, Building Regulations M4(2) for accessible and adaptable dwellings will apply to all new homes, unless they are built to the M4(3) wheelchair adaptable standard. Is this requirement justified and supported by robust evidence? Would it address an identified need as specified by national policy?

The HBF and its members recognise that some homes will need to be built to higher accessibility to standard to meet the increasing demand for such homes. Indeed, many of our members will adapt homes to meet these requirements on request when someone is buying a new home. However, the HBF does not consider it necessary for all new homes need to be built to part M4(2) of the Building Regulations in order to meet needs moving forward.

The Council correctly note that the population of Brentwood is ageing at a faster rate than it has in the past and that there is a strong correlation between age and long-term health conditions and disability. This is not disputed. However, when considering whether this ageing population translates to the need for all new homes in developments of over 10 units it is important to consider how many of those over 65 will not only require the home to be adapted but will also seek to move in order to have their needs met.

We note that the Council use the CORE LA lettings evidence with regard to its estimates of needs. These relate to social housing moves and as such cannot be used to determine needs across the whole market. Some evidence relating to the whole market this is provided in the English Homes Survey. Whilst we recognise that this is a national study it provides an indication as to the proportion of more adaptable homes that are required. The study examined the need for adaptations in 2014/15<sup>1</sup> and noted that just 9% of all households in England which had one or more people with a long-term limiting illness or disability required adaptations to their home and that this had not changed since 2011-12. So, despite an increasing amount of older people in the general populace the proportion of the population requiring adaptations had not changed. As such the assumption that is seemingly made by the Council in paragraph

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<sup>1</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/539541/Adaptations\\_and\\_Accessibility\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/539541/Adaptations_and_Accessibility_Report.pdf)

7 of F5G that the proportion of new homes that need to be adapted increases by the same amount as the ageing population is not correct.

It is also the case that many older people are less likely to move home. The assumption that seems to have been made by the Council in paragraph 8 of F5G is that the proportion of older people in the housing will be directly reflected in the number of moves. Data from the 2011 census showed that just under 11% of all those living at a different address one year previously were over 65, despite forming 19% of the population. In addition, the majority of those 'new' older person households forming over the plan period are currently resident in the Borough – they have not moved from elsewhere, they are a reflection of an ageing population. Many will want to stay in their own home and, if necessary, have that home adapted to meet their needs. In many cases that will be possible, and even more so in more recently built homes where accessibility is significantly better than in older housing stock.

The English Homes Survey also found that in 2014-15, 81% of households that required adaptations in their home, due to their long-term limiting disability, felt their current home was suitable for their needs and that 10% of those households whose home required an adaptation were trying to move somewhere more suitable. So, whilst there is an ageing population this does not directly lead to the need for all new homes built to higher accessibility standards. An ageing population will lead to more people who are likely to have a mobility problem but not necessarily more people who need a new home built to the M4(2) standard. Many older people, and indeed those of all ages with a long-term limiting illness or disability, will be able to adapt their existing homes to meet their needs and do not need to find alternative accommodation. It is also the case that for many people a new home built to the mandatory M4(1) standard will offer sufficient accessibility and adaptability throughout their life.

106. Is criterion A b of the policy requiring a minimum 5% of new affordable dwellings to meet the M4(3) standard, on sites of 60 or more dwellings, justified by robust evidence? Is the threshold level justified and effective? Does this provision address an identified need as specified by national policy?

We note the evidence set out in the Council's response to the Inspectors initial question 61 in paragraphs 11 to 17 which now provides a more thorough analysis of this situation. However, as we note above an increasing ageing population does not necessarily mean increasing numbers of wheelchair users and the evidence on moves should only be considered against moves within the social housing market.

107. Criterion A c of the policy sets a threshold of sites of 500 dwellings or more on which self-build (and custom build) homes and specialist accommodation are required to be provided.

a) Is the requirement for a minimum 5% self-build homes justified and supported by a credible evidence base? What amount of self-build homes would this provide? Is this level of provision echoed in all relevant site allocations and is it consistent?

No comment

b) What specialist accommodation is being sought? Is this clear, is it justified and is it based on robust evidence?

No comment

c) The Council has suggested that the threshold be reduced so that the requirements apply to sites of 100 dwellings or more. Is this justified, supported by the evidence and necessary for soundness? What implications, if any, would this have for any other policies within the Plan and would it effect site viability?

This amendment is not justified or necessary for soundness. Firstly, the amendment to the self-build policy is in response to new data which the Council suggests indicates a higher annual average demand for self-build plots on their self-build register. However, it is important that data on the self-build register is considered against other relevant data sources. The data on such registers is flawed in that it does not consider whether individuals on such registers are on other registers in neighbouring areas and whether those on the list are still seeking a self-build plot. It would be helpful to know whether the Council has undertaken a review of its list with regard to such matters. There is also no analysis as to whether there is demand for self-build plots within major developments. The majority of self-builders are probably not seeking to build there home on a major development site.

Secondly, the Council does not appear to have considered how many self-build plots have been delivered within each of the base periods. The Council is required to ensure sufficient self-build plots come through for each base period and without an understanding of how many such plots come through via windfall the Council do not have the necessary evidence to support the proposed change.

Finally, whilst Councils are required to maintain a self-build register and identify sufficient plots to meet the needs of those wanting to build their own homes it does not require the provision of such plots on sites for residential development. In fact, the NPPG is clear in paragraph 57-025 that Council's should engage with landowners who own sites and to encourage them to consider self-build and custom housebuilding. In addition It should also be noted that planning policy is just one approach highlighted by PPG which also identifies the need for Council's to use their own land to support self-builders and to consider how they could meet demand through local housing and regeneration strategies. It is not clear that other such mechanisms have been considered by the Council in seeking to meet the demand for self-build plots. The Council should be examining how it can secure delivery through such mechanisms before amending its submitted policy as is being suggested.

108. It has been suggested that criterion B of the policy could hinder the delivery of smaller sites with two or more separate ownerships where land parcels are separated physically or legally. Is the wording of the policy justified and effective in this regard?

No comment

109. Have the requirements of the policy been suitably viability assessed?

The viability assessment considers the application of the 5% target on sites of 20 plus units.

**Policy HP06 Housing standards**

116. Is the requirement, in criterion A of the policy, for all new residential development to comply with the nationally described space standard (NDSS) justified and consistent with footnote 46 of paragraph 127 of the NPPF? Is it necessary for soundness to set the NDSS out within the supporting text? Does the evidence demonstrate that the application of the NDSS is viable?

The Council do not appear to have examined whether or not there is evidence to support the introduction of the NDSS. These are optional standards and should only be introduced, as set out in both the NPPF and PPG in order to address an identified need. Whilst the Council may consider it nice to have these optional standards it must have the necessary evidence to show that they are needed. As the Council note in paragraph 21 of F5G that there are no particular issues within the Brentwood housing market to require to depart from national standards there does not appear to be the evidence to support the introduction of the optional NDSS.

117. Are the proposed external residential space requirements justified, effective, consistent with national policy and have they been included in the viability assessment?

No comment

118. Are criteria C to F of the policy relating to housing quality sound? Is the suggested Council modification to delete criteria C and D necessary for soundness?

No comment

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## Appendix 1: Rolling Five-year Housing Land Supply

	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33
<b>Req'ment</b>	456	456	456	456	456	456	456	456	456	456	456	456	456	456	456	456	456
<b>Cumulative</b>	456	912	1,368	1,824	2,280	2,736	3,192	3,648	4,104	4,560	5,016	5,472	5,928	6,384	6,840	7,296	7,752
<b>Delivery</b>	150	213	246	200	245	603	781	884	638	524	561	452	452	412	392	312	312
<b>Cumulative</b>	150	363	609	809	1,054	1,657	2,438	3,322	3,960	4,484	5,045	5,497	5,949	6,361	6,753	7,065	7,377
<b>Deficit</b>	-306	-549	-759	-1,015	-1,226	-1,079	-754	-326	-144	-76	0	0	0	-23	-87	-231	-375
<b>Five-year req'ment</b>	2,280	2,280	2,280	2,280	2,280	2,280	2,280	2,280	2,280	2,280	2,280	2,280	2,280				
<b>Add deficit</b>	2,280	2,586	2,829	3,039	3,295	3,506	3,359	3,034	2,606	2,424	2,356	2,280	2,280				
<b>Buffer</b>	114	129	141	152	165	701	672	152	130	121	118	114	114				
<b>Total req</b>	2,394	2,715	2,970	3,191	3,460	4,207	4,031	3,186	2,736	2,545	2,474	2,394	2,394				
<b>Five-year supply</b>	1,054	1,507	2,075	2,713	3,151	3,430	3,388	3,059	2,627	2,401	2,269	2,020	1,880				
<b>Surplus/deficit</b>	-1,340	-1,208	-895	-478	-309	-777	-643	-127	-109	-144	-205	-374	-514				
<b>5YHLS</b>	<b>2.20</b>	<b>2.78</b>	<b>3.49</b>	<b>4.25</b>	<b>4.55</b>	<b>4.08</b>	<b>4.20</b>	<b>4.80</b>	<b>4.80</b>	<b>4.72</b>	<b>4.59</b>	<b>4.22</b>	<b>3.93</b>				

