

Home Builders Federation

Matter 4

BRACKNELL FOREST LOCAL PLAN EXAMINATION

Matter 4: Housing Numbers

Issue 1: Whether the Council's approach to calculating its full, objectively assessed needs and housing requirement is justified, based on up-to-date and reliable evidence, effective, positively prepared, and consistent with national policy?

Objectively Assessed Need-Housing

Q42. Does the plan period cover an appropriate time frame for the provision of housing (2020/21-2036/37) consistent with national policy? If not, what would be the implications for housing need?

No. Paragraph 22 of the NPPF states that local plans should look ahead for at least 15 years from the point of adoption. Given that this plan at it earliest will not be adopted until the start of 2023 will require the plan period to run to at least 2037/38 to be consistent with national policy. This will add an extra year to the overall housing need to 11,052 homes. Taking into account the Council's proposed 10% buffer to ensure housing needs are met in full will mean housing supply should be increased 12,157 new homes.

43. To determine the minimum number of homes required, housing policies should be informed by the Government's local housing need methodology. As such, are the inputs used to determine the level of housing needed within the LP appropriate?

It is common knowledge that the standard method requires the use of the most up to date data with regard to the work place-based affordability ratios with any assessment being fixed for two years from submission to the Council. Using the latest ratio available at the time of submission results in a local housing needs assessment of 589 dpa, 24 homes fewer per annum than using the affordability ratio from the previous year. However, whilst PPG requires Council's to update their assessment as the plan progresses however the Government has also been clear that the results arising from the standard method represent the minimum number of homes that should be planned for. As we set out in our representations, we do not consider it appropriate to reduce



the housing requirement in this local plan. Firstly, the NPPF requires Councils to consider taking the unmet needs from other areas. London is not meeting its own housing needs and the failure of the capital to meet its growing need for housing will inevitably place pressure on housing markets in the neighbouring south east region as more people seek to meet their accommodation needs away from the capital. It would therefore be inappropriate to reduce the requirement given that there are unmet needs in the capital and that London has asked for help from local authorities across the South East of England in addressing their unmet housing needs.

Secondly, the Council will fall well short of addressing its need for affordable housing which is currently estimated to be 338 dpa. Paragraph 2a-024 of PPG states that Councils should consider whether an uplift to the total housing figures included in the local plan may need to be considered where it could help deliver the required number of affordable homes. The differential between what is needed and what is expected to be delivered would support the Council's decision to retain the requirement to deliver 614 dpa. Indeed, the potential under supply of affordable housing would suggest that the housing requirement should be increased beyond that included in the submitted local plan.

44. Are there exceptional circumstances to suggest that an alternative approach be taken? If so, what are they, and how would they impact on housing need?

No.

45. Are there other considerations that are likely to drive an increase in the homes needed locally, such as any needs that cannot be met within neighbouring areas?

As set out above the failure of London to meet its housing needs will drive migration and demand for homes across the South East. As such all Councils across the South East should be considering the impact of London's inability to meet its housing needs and the potential contribution, they should make to addressing the capital's current shortfall. The impact of London's failure to meet its housing needs on Bracknell Forest will be an increased level of migration from the capital that will drive demand for homes and see worsening affordability unless housing delivery is increased. At the very least we would suggest that the Council's housing requirement should not be reduced based on the change to the affordability ratio seen in last year's data.

46. What are the implications, if any, of the Plan's economic strategy, and in particular, the proposed Science and Innovation Park at Jealott's Hill on the demand for housing?

In considering the number of homes that should be delivered it is important for the Council to consider whether any strategy for economic growth in the area will need to be supported by higher levels of housing delivery than that arrived at using the standard method. Whilst the Council have considered the circumstances specifically highlighted in paragraph 2a-010 of PPG which may drive an increase in the number of homes needed in area beyond that derived from the standard method It is important to remember that paragraph 2a-010 of PPG does not provide an exhaustive list of

circumstances and it is important to ensure that housing growth is sufficient to support the areas economic strategy. Whilst the Council considered this issue in the 2016 SHMA it does not appear to have considered this issue more recently. It is essential that the expected jobs growth will be supported by the level of housing being provided.

Affordable housing

47. Is the figure of 338 affordable homes per annum, split between rented and owned homes, subject to S106 control, based on appropriate evidence?

No comment.

48. Given the date of the submission of the Plan, the Council is not required to take into account Paragraph 72 of the Framework. Should the Council commit to an early review of the Plan to give plan-led support to the development of entry-level exception sites?

The Council's policy does not specify the tenure mix for affordable housing and as such offers flexibility for the delivery of First Homes on the basis of the requirements set out in national policy. However, we would agree that a commitment in policy to an early review in order to consider First Homes exception sites would enable the Council to consider how best to support the delivery of such homes.

Other specialist needs

51. How have the needs of other caravan dwellers and houseboat dwellers been considered within the Council's evidence base?

No comment.

52. What assessment has taken place of the needs of particular groups by household size, type, and tenure, including self-build and custom housebuilding? What assumptions have been made to calculate the need for specialist housing: for example, housing for older people and students, and for households with specific needs, to ensure that the appropriate level of need is made explicit within the plan?

No comment.

Housing Requirement

53. Is a housing requirement of 11,482 dwellings made up of 10,438 dwellings to meet local housing need and 1,044 dwellings to provide for additional flexibility, justified and consistent with national policy?

The housing requirement for Bracknell Forest and the level of supply necessary to meet that requirement need to be clearly distinguished in policy LP3. It is clear from the Council's evidence, for example paragraph 2.1.4 of the Housing Topic Paper

(LP/PS/001) that it considers its housing requirement to be 614 dpa (10,438 dwellings) and that the 10% allowance is included to ensure that this requirement is met in full. The HBF would suggest that the policy is amended to provide the necessary clarity.

The need for the 10% buffer to provide flexibility is consistent with national policy and justified. This buffer recognises that sites do not deliver as expected and ensures, as required by paragraph 35 that the requirement is deliverable over the plan period. In particular it is necessary to provide a buffer in supply over the housing requirement where there is a reliance on a limited number of strategic sites to meet housing needs. The complexity in delivering such sites means that there can be delays as to when the initial homes on any site will be delivered and it is important to ensure there is flexibility in the supply of homes over the plan period to take account of any delays.

54. Is it the Council's intention that the housing requirement against which any five-year supply of deliverable housing land will be calculated should be predicated on the LHN and a 10% flexibility buffer? Is the housing requirement set out in an unambiguous manner?

As set out above the Council must clearly differentiate between the housing requirement and the proposed 10% buffer in supply to ensure housing needs are met in full. This will ensure clarity for such discussions at any future appeals and the application of the appropriate buffers set out in paragraph 74 of the NPPF.

55. Is the use of an average annualised, housing requirement justified and appropriate, given that a number of existing allocated sites are dependent on the provision of infrastructure, and that a significant percentage of the new housing proposed is within the Garden Village allocation. If a stepped approach can be justified, please set out what this should be and why?

Yes. It is important to recognise that paragraph 68-021 of PPG states that stepped trajectories “*may be appropriate ...*” and as such the expectation from Government is clearly that housing requirements should, in the first instance, seek to ensure a consistent supply of new homes across the plan period. This is further supported later in the same paragraph which states that in the event of using a stepped trajectory that they should not unnecessarily delay meeting housing needs. The Government is clearly supportive of local plans that seek to meet needs as soon as possible recognising that much of the housing needs in many areas is as result of past under delivery and a failure to deliver homes early in the plan period has consequential impacts on affordability.

The Council have set out a plan that can meet an annualised housing needs of 614 dpa taking into account the infrastructure requirements necessary to support their delivery. Uncertainty over the delivery of new homes as a result of the inclusion of the new garden settlement is being addressed through the 10% buffer. If there remain uncertainties as to infrastructure and potential delays to homes coming forward on this site, we suggest that the supply buffer be increased to take account of these risks and ensure needs are met consistently across the plan period.

56. What is the housing requirement for each designated neighbourhood area? Is it appropriate that these figures be defined within policy LP 4, which sets out the allocations for the plan?

No comment

57. Are there any policies within the Framework that protect areas or assets of particular importance that provide a strong reason for restricting the overall scale of housing within the plan area?

No.

58. Are any main modifications required in order for the plan to be found sound?

As set out above the plan period must be increased in order to ensure the plan is consistent with national policy. The HBF would also suggest that the housing requirement is increased on the basis of the unmet needs arising in London and to better meet the needs of affordable housing in Bracknell Forest.

Mark Behrendt MRTPI

Planning Manager – Local Plans SE and E