

Sent by email to: Development.Plan@Bracknell-Forest.gov.uk

15/08/2022

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the proposed modifications following the stage1 hearings.

Thank you for consulting the Home Builders Federation (HBF) on the proposed modifications to the local plan following the stage 1 hearings. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Policy LP3 Housing Requirement and Supply

Whilst the policy identifies the minimum housing requirement for the plan period the policy goes on to state that the requirement against which housing needs will be assessed is 579 dpa due to completions between 2020/21 and 2021/22. This approach is not consistent with national policy or effective. The minimum number of homes that the Council are required to deliver and should be used in any assessment of the five-year land supply is 614 dpa with any under or over supply being taken into account at the point of assessing the five-year land supply and not within the policy itself. This will ensure that any potential errors in monitoring delivery are not baked into the policy itself.

Furthermore, the policy goes on to state that and accumulated surplus of completions over the minimum requirement will be taken into account in calculating the five-year requirement for that period. The HBF do not consider such an approach to be sound. Whilst we recognise the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) are silent on the issue of how over supply should be taken into account in land supply assessments it is not logical that the cumulative supply above the requirement is taken into account in the following five years as this fails to take account of expected delivery over the whole plan period. It must be remembered that the requirement to ensure under supply is addressed within five years, as set out in paragraph 68-031 of PPG, is a mechanism to ensure that Council do not continually



push back the delivery of housing and ensure that shortfalls are addressed rapidly. As such it does not follow that the same mechanism should be applied to oversupply. Indeed, the Council recognise this in the second paragraph of the amended policy which in effect averages over supply across the remaining plan period.

Finally, the Council state in LP3 that any accumulated deficits are accounted for in the buffer applied following the application of the Housing Delivery Test. It is not clear to us what the Council mean by this and it will require clarification. Paragraph 68-022 of PPG states that the buffer should be applied to the five-year requirement “*including any shortfall*” yet it would appear that the Council are seeking to include the shortfall following the application of any buffer. If this is the Council’s intention then it is inconsistent with PPG.

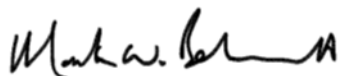
Recommendation.

The Council should delete the second and third paragraphs from policy LP3.

Housing supply

The HBF remain concerned that the windfall assessment with regard to medium sized sites is not supported by the Council’s update to the viability evidence in Exam 30A. Whilst it indicates that small and medium sized sites outside of Bracknell are viable it is the case that Bracknell is considered to be unviable at the policy costs placed on development. Given that Bracknell is the principle town in the area and a significant proposition of the windfall is likely to come forward there we remain concerned that the Council’s windfall assessments for medium sized sites is not justified. The Council will need to consider how much windfall is expected to come forward on medium sized sites in Bracknell and reduce its expectations accordingly.

Yours faithfully



Mark Behrendt MRTPI
Planning Manager – Local Plans
Home Builders Federation
Email: mark.behrendt@hbf.co.uk
Tel: 07867415547