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Dear Inspectors

Response by the Home Builders Federation to the consultation on the additional evidence supporting the Brentwood Local Plan

Thank you for the opportunity to comment on the additional evidence that was published by the Council to support the examination of the Brentwood Local Plan. 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.

Our comments relate to the latest housing trajectory published in F81A (April 2021) with our key concerns being:

- The continued failure to meet needs in full;
- The housing trajectory pushing back significant levels of delivery to the end of the plan period;
- The use of the Liverpool method for calculating five-year housing land supply.

Meeting housing needs

This latest trajectory sets out that the Council expect to deliver 7,092 new homes over the plan period against a requirement of 7,752. As the Council note in Table 2 of F81A this is a shortfall of 660 homes. This situation is unsound. The Council are required to meet housing needs unless, as set out in paragraph 11 of the National Planning Policy Framework (NPPF), the application of policies in the Framework provide strong reason for restricting the overall scale of development in a plan area or any adverse impacts would significantly and demonstrably outweigh the benefits. The Council have not established that either of these are the case with regard to meeting housing needs in Brentwood. In order to ensure the local plan is consistent with paragraph 60 of the Council must allocate additional sites to ensure housing needs are addressed in full.

The housing trajectory

The Council consider it necessary to use a stepped trajectory on the basis of poor delivery in previous years and that a strategic site will deliver later in the plan period. However, paragraph 68-021 of Planning Practice Guidance (PPG) also states that step



trajectories should not unnecessarily delay meeting identified development needs. The proposed trajectory set out in F81A outlines a stepped trajectory that places 38% of required housing delivery in the final three years of the plan. Such an approach delays the delivery of much needed new housing and negates any potential benefit with regard to improving affordability that would result from meeting needs, and in particular the existing backlog, earlier in the plan period. Given that affordability in Brentwood is worsening with the work placed based affordability ratio increasing from 12.24 to 13.22 from 2019 to 2020 there is clearly a need for more supply earlier in the plan period to try and limit a further worsening of affordability in this area.

Methodology for calculating five-year housing land supply.

The Council are proposing to use the Liverpool methodology in calculating its five-year housing land supply. This method is not in line with PPG which states at paragraph 68-031 that the deficit should be "... *added to the plan requirements for the next five years (the Sedgfield approach)*" We recognise that PPG allows Councils to make the case for a different approach to be used through the local plan. However, we would suggest that in the case of Brentwood the use of both the stepped trajectory and the Liverpool pushes back to much of the housing required to meet needs in Brentwood towards the end of the plan period rather than seeking to address more of those needs over the next five years.

Recommendation

Rather than fail to meet housing needs and push back the requirement to deliver new homes we would suggest the Council examines the potential for additional sites to be allocated that will deliver earlier in the plan period. We accept that a stepped trajectory is likely to remain necessary, however, additional allocations to meet needs in full would potentially allow the backlog to be addressed in the manner required by PPG and provide a more balanced supply of homes across the whole plan period. At present the Council are relying on a strategy that fails to achieve either of these requirements of national policy and without further allocations cannot be considered sound.

Yours faithfully



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