



**BRENTWOOD
BOROUGH COUNCIL**

Response to the “Planning for the right homes in the right places” consultation October 2017

Brentwood Borough Council supports the principles for simplifying the calculation of local housing need, most importantly to provide a more understandable process that is publicly available. We would hope that revised specifications for local planning authorities would be realistic and have regard to local constraints. This new proposed method would seem to be an improvement over the current method.

It is essential that more certainty be provided in the plan-making process as well as simplifying the requirements. The Council is proactively looking to address local housing demand to deal with the national housing crisis in our borough. However, the situation whereby housing needs increase each year that new projections are announced hinders the plan-making process. This is not aided by simply increasing need in those areas where housing affordability is an issue – which in much of the south east of England is an issue not down to a lack of will to deliver housing but by a range of constraints. There is also the challenge that by simply focusing on annual housing need over a plan period that we are not dealing with the real problem in much of the south east, which is how to deliver houses now in areas within Green Belt and constrained by existing infrastructure.

The following comments relate to finer details in the assumptions made as part of proposing a standard method for calculation.

Affordability

Assumptions made about increased housing growth in areas that have experienced affordability issues is overly simplistic. These issues exist because of high house prices in the case of Brentwood Borough and the south east predominantly. There is a lack of evidence to support the view that increasing housing supply will have a noticeable impact on house prices. The standard method calculation of the affordability of an area relates to the use of workplace wages, which is the basis for the uplift as opposed to resident wages. In the case of Brentwood Borough, workplace wages are lower than resident wages because of a high in and out commuting flow – where very generally Brentwood residents commute out to support London and other local jobs are filled by people commuting in to the Borough. Using workplace wages as a basis means that Brentwood picks up a very high market signal, which does not seem correct given that local house prices are determined by resident wages. The Council would suggest that using resident wages as a basis would be more sensible.

Number to Apply from Submission

It is noted that proposed figures for objectively assessed need for each local planning authority are published in the housing need consultation data table. However, when following this method, the need number is likely to change by summer 2018 as new household projections are released. This means that the applicable need number to apply will depend on when a plan is submitted, which is particularly difficult to predict when undertaking consultation on issues and options at earlier stages of the plan-making process before the need is set. This will result in similar challenges and delays to plan-making that local planning authorities face now, where numbers inevitably change over the period that a plan is being prepared, meaning additional sites need to be identified to meet needs and crucially, ensure that supporting technical evidence has been thoroughly considered as part of delivering a sound plan. In the south east of England demographic projections seem to have only increased in recent years resulting in higher objectively assessed need at submission than when the plan-making process starts, causing delay and additional expense.

Projection Base

The continued use of the official projections makes the housing need number unstable between projection rounds. The official projections can be highly volatile because they use a very short (five-year) trend base for domestic migration and each round of projection only shares three of the five data points informing the previous round. The Council suggests that a longer period be used (a ten-year projection for example), and that the number be fixed earlier to allow other evidence to align with a stable housing number.

Cross-boundary working

Housing need for almost all surrounding authorities in Essex and the south east have seen a considerable uplift in housing need, generally because of assumptions about affordability. This poses questions about cross-boundary unmet housing need, particularly with London. In the current proposals, the weight given to constraints such as Green Belt is unclear, as are the cross-boundary working arrangements. Whilst there is acknowledgement that not all authorities can meet housing needs due to constraints such as Green Belt, this is ignored in the standard method calculation. This leaves a reliance on unmet need being met by other adjoining authorities but fails to recognise situations where these authorities are also constrained by Green Belt, for example. Higher need will mean authorities will be required to identify additional housing land. Brentwood Borough Council believes this uncertainty will only serve to further delay delivery of local plans.

Housing Shortfall

A key issue the Council has faced in the preparation of a new Local Plan has been the difficulty of starting from a position of high housing need backlog when objectively assessed needs are applied from the point at which the regional plan was abolished (2013). This makes it extremely difficult to provide a five-year housing supply even when suitable allocations are made to meet full objectively assessed need over the plan period. No mention of backlog is made in the standardised method. It would be far simpler for local planning authorities to apply housing need from submission or the start of a plan period to be able to effectively meet a five-year supply of homes in areas where need has increased significantly, requiring an uplift of delivery which will inevitably take time.

Other Comments

There is no consideration of vacancies, second homes, concealed and/or shared households in the methodology and, accordingly, there is no conversion of households to dwellings. The methodology will also need to fully consider the length of local plans, which are often well beyond 10 years.

Conclusion

In general terms, the Council welcomes the opportunity through this consultation to make representation on both the calculation of housing need numbers and the approach to delivering a local plan. Simplifying the process would enable us to swiftly deliver a sound plan whilst recognising the Borough's local character constraints. We support the need for additional housing to meet future demand and a clearer process would enable us to work with partners to ensure the necessary infrastructure can be delivered alongside development. We urge the Government to use this opportunity to speed up the plan-making process by removing much of the associated complexity, which in turn subsequently causes delay in delivering a sound and workable plan.
