



Brentwood Housing Action Plan

February 2020

1. Introduction

The need of tackling under-supply of housing

The Government's White Paper "Fixing our broken housing market" makes it clear that the housing market in the UK is broken. The problem, it concludes, is threefold: not enough local authorities planning for the homes they need; house building that is simply too slow; and a construction industry that is too reliant on a small number of big players.

Following this, the National Planning Policy Framework 2018 (NPPF) and National Planning Policy Guidance (NPPG) introduces the 'Housing Delivery Test' (HDT) as the mechanism to monitor local delivery. The HDT measures net additional dwellings provided against the homes required with results on performance for each local planning authority in England and is issued annually in November.

The consequences of failing the Test are set out in the NPPG:

- a. the authority should publish an action plan if housing delivery falls below 95%;
- b. a 20% buffer on the local planning authority's 5 year land supply if housing delivery falls below 85%; and
- c. application of the presumption in favour of sustainable development if housing delivery falls below 75%, subject to the transitional arrangements set out in paragraph 215 of the NPPF.

It is important to note that the presumption in favour of sustainable development introduces a test, which has become known in legal cases as 'the tilted balance,' in favour of granting permission for housing development. This test states that where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites; or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement, permission should be granted unless:

- a. policies in the NPPF that protect areas or assets of particular importance provide a clear reason for refusing the development proposed or
- b. (ii) where any adverse impacts of approving the proposed development would significantly and demonstrably outweigh the benefits.

This means in such scenario, local authorities will come under pressure to approve inappropriate development (i.e. development conflicting with adopted planning policies) as developers seek to rely on the tilted balance arguments in favour of housing delivery. This may lead to an increase in planning appeals as adopted planning policies are tested against the presumption in favour of sustainable development. The worst-case scenario for the Council would be the loss of vitally important lower value uses such as offices, shops, pubs, restaurants and community uses to residential development.

The more obvious consequence of under-delivery is fewer homes are built to meet demand and need, which exacerbates the unaffordability of homes and lack of funding of infrastructure. This is

because development can generate funds to provide affordable homes and infrastructure provision. The affordability ratios, published on 28 March 2019 by ONS, indicates a continued worsening in housing affordability in Brentwood and raises further concern.

The purpose of this Housing Action Plan

The number of homes that actually get built has fallen short of the housing targets set for Brentwood. This action plan has been produced to investigate the reasons for the under delivery of new housing in the borough. It sets out how the Council will respond to the challenge of building more homes faster and the actions we propose to take to address housing delivery.

2. Local housing delivery performance

Context

The Borough's current development plan is the Replacement Local Plan 2005. The Council is currently preparing a new Local Plan (currently Pre-Submission Local Plan) for the Borough which, once adopted, will supersede the Replacement Local Plan 2005. The Pre-Submission Local Plan proposes to allocate 26 sites across the borough for residential-led development, totalling 7,752 new dwellings to be built over the Plan period 2016-2033.

At the time of writing, the Pre-Submission Local Plan is going through its final stage before being submitted to the Secretary of State for an Examination-in-Public.

Past performance

The government's 2018 Housing Delivery Test outcome for Brentwood is 51%; therefore, the Council is required to add an additional buffer of 20% to the local housing need for persistent under delivery.

Year	Number of homes required	Number of homes delivered	HDT 2018 measurement
2015 - 16	302	111	51%
2016 - 17	305	150	
2017 - 18	325	213	
Total	933	474	

Figure 1: Housing Delivery Test 2018

In terms of the five-year housing requirement and the forecasted housing supply, Brentwood Borough can only demonstrate a suitable supply of housing for 2.36 years, substantially below requirement.

For period 01/04/2019 - 31/03/2024	
Housing need per year (using the 2014-based household projections)	452 dwellings
Housing need per year plus 20% buffer	542.4 dwellings
Total deliverable housing supply for period 01/04/2019 - 31/03/2024 ¹	1,284.7 dwellings
Total deliverable housing supply in years for period 01/04/2018 - 31/03/2023	2.36 years

Figure 2: Housing land supply at 31st March 2019

As at 31st March 2019, there are 885 extant permissions (this figure factored in a 10% non-implementation) that have yet to commence building works.

Total Extant Permissions as at 31/03/2019	Dwellings
Sites with planning permission subject to section 106	166
Extant planning permissions on unallocated large sites	60
Extant planning permissions on small sites	239
Prior Approval (residential)	518
Non-implementation discount (10% of supply)	-98.3
Brownfield Register Sites (with pre-planning permission)	400
Total	1,284.7

Figure 3: Deliverable supply as at 31/03/2019

The Council prepared the Brownfield Registry as required by the Town and Country Planning (Brownfield Land Register) Regulations 2017. The Brownfield Registry consists of two parts, where applicable: Part 1 all brownfield sites which meet the required criteria (see below); and Part 2 brownfield sites which are granted permission in principle. When the Register was first produced in 2018, there were 45 sites with an estimated minimum total dwelling capacity of 2,625 dwellings. Since then, a total of 11 sites have commenced building works, with approximately 546 units expected to be completed by 2020/21.

Application Number	Site Name / Address	Estimated Number of Dwellings
15/01379/FUL	Warley Training Centre, Essex Way, Warley	50
17/01527/OUT	Essex County Fire Brigade HQ, Rayleigh Road, Brentwood, CM13 1AL	101

¹ Not including proposed allocations in the Pre-Submission Local Plan. See Figure 3.

14/01446/FUL	Former Mountnessing Scrap Yard, Roman Road Mountnessing	85
16/01298/PNCOU	Regent House Hubert Road, Brentwood	120
17/00891/PNCOU	Leigh House Weald Road Brentwood Essex CM14 4SX	10
16/01462/FUL	114-112 Kings Road Brentwood Essex CM14 4EA	15
16/00183/FUL	Eclipse Ongar Road, Brentwood Essex, CM15 9AU	16
16/01729/FUL	24 Norton Road Ingatestone CM4 0AB	5
14/01247/FUL	Former Elliots Nightclub and Petrol Station West Horndon CM13 3TB	20
18/00542/FUL	Brescia House and 5 & 7 Eastfield Road Brentwood Essex CM14 4HB	15
17/00127/PNCOU	Library House New Road Brentwood	55
15/01084/FUL	Land Formerly Known as NV Tools St James Road Brentwood	45
17/01372/FUL	Majenta House Coptford Road Brentwood Essex CM14 4BS	8
18/01570/FUL	Chain Bridge Farm	1
Total	11 Sites	546

Figure 4: Brownfield Land Register: Table of site which have commenced development

Barriers preventing homes from being built

Green Belt constraints and the lack of available, suitable land

All of the borough's countryside lies within Metropolitan Green Belt of London. That equates to 89% of the borough, the sixth highest in England by percentage of total area. Green Belt helps protect much of the high-quality agricultural land and countryside but it also constrains development opportunities. There are only a small number of strategic sites capable of delivering significant amounts of housing.

Preserving the historic built environment

The borough has significant built heritage. It has over 500 listed buildings, 13 Conservation Areas, 12 scheduled ancient monuments, 100s of sites of archaeological interest. The 13 Conservation Areas cover a significant proportion of the Borough's residential areas. The height of buildings in these conservation areas are relatively consistent, ranging from 2-3 storey, therefore opportunities for significant intensification of existing sites are limited.

Affordability

Although demand for housing in Brentwood remains high, affordability is rapidly becoming a major issue, the ONS' 2018-based affordability ratio has increased from around 11.23 to 13.30, indicated that housing affordability in Brentwood has worsened to a greater degree than any other authority in Essex. The slow build-out rates exacerbate the situation and drives prices even higher.

Brexit factor

The economic uncertainty around Brexit was recognised to have caused disruption in the building industry and housing market in the UK; as well as Brentwood. The Purchasing Managers' Indices (PMIs) and construction output statistics² shows a continued declined trend in the UK's building industry, across all subsectors including commercial construction activity, house building and civil engineering work. This further exacerbates property developers' delayed decision-making and build-out rates.

What we have done so far to ensure more homes are built

The Council has already taken a number of steps to boost the delivery of homes, including:

Reducing uncertainty and minimising risk for developers

The Council's Development Management Team provide a pre-app service to review applications before their submission which aid to reduce uncertainty for developers and lowers the costs of exploring development options and unnecessary delays.

The use of Design Review Panels and Planning Performance Agreements (PPA) is another mechanism that significantly reduces the risk and support the delivery of housing development in the borough on larger schemes. PPA is a project management often used on large schemes to guide the proposed development through all stages of the planning process. This process sets out a timetable for decision making and ensures sufficient resources are allocated. Design Review Panels are a group of independent, multi-disciplinary construction professionals that offer early constructive discussions to help the design development process.

In addition, the Council has also produced an area specific Supplementary Planning Document for Brentwood Town Centre that helps to guide developers towards proposals that would be granted planning permission. This further reduces the uncertainty for developers in bringing forward housing development proposals.

Efficient planning process

The data on deciding planning applications shows that the Council functions efficiently. Average turnaround time for validation, including public consultation is 4 days, 91.6% of major apps were determined within 13 weeks (or with EOT), 98.4% of minor apps were determined within 8 weeks (or with EOT)

²

<https://www.ons.gov.uk/businessindustryandtrade/constructionindustry/bulletins/constructionoutputingreatbritain/june2019#detailed-growth-rates>

Progressing the emerging Local Plan

Through preparing the emerging Local Plan, the Council has sent out two calls for sites to find potential sites to be allocated. The emerging Local Plan identified sites capable of delivering 7,752 new residential dwellings (net) to be built in the borough over the Plan period 2016-2033 on land suitable for housing development.

Engaging with stakeholders in identifying infrastructure gap

Early engagement and focused workshop with key infrastructure stakeholders have taken place in preparing the Infrastructure Delivery Plan which provides the Council an understanding of infrastructure deficit in the context of Local Plan growth. This provides a schedule of infrastructure requirements to help support new development growth planned within Brentwood borough.

Identifying funding opportunities

The Council is proactively driving forward the Dunton Hills Garden Village project by working with stakeholders, service providers, Essex County Council and neighbouring authorities. A project team was created to oversee the project and it has received over £600,000 of funding from Homes England in the last three years, showing a commitment both nationally and locally to delivering housing need.

Producing a new Housing Strategy and developing new Council house building scheme

In recognition of the changing housing environment, a new and ambitious Housing Strategy 2017-2020 was developed to provide the direction and vision for the delivery of services across the Council's property, estates, sheltered and housing options teams. The Council then has embarked on new schemes of Council house building for the first time in over a decade. We started with focussing on small-scale achievable sites, including two schemes at Fawters Close (sheltered homes for older residents) and Magdalen Gardens (family size homes).

Empty home strategy

The Council has developed an Empty Homes Strategy 2017 – 2020 in relation to privately owned vacant properties to reduce the number of empty homes, and to facilitate and assist in the unlocking of good quality and affordable accommodation for local people in the Borough.

3. Next step

The Council is looking at a range of actions to boost housing delivery including:

Developing Council owned land

In July 2019, the Council approved the formation of a £1bn joint venture (JV) with Morgan Sindall Investments. The joint venture will bring forward new homes, public open spaces and commercial and leisure facilities in the borough. The JV will initially focus on three Council's owned sites located at William Hunter Way Car Park, Westbury Road Car Park and the Maple Close garages site. These will provide new homes together with new leisure and community facilities, boosting sustainable housing supply across the borough to meet the needs of its growing population.

Actions

Develop the Council owned land holdings to bring forward more affordable homes without the need to rely on third party developers.

Prioritise the delivery of strategic sites

The Council is proactively driving forward strategic projects including Dunton Hills Garden Village (R01), land at West Horndon Industrial Estate (R02), land North of Shenfield (R03), and Ford Headquarters and Council Depot (R04 & R05). It is acknowledged that there are a number of barriers in bringing strategic sites forward for homes, such as:

- a. Multiple landowners with differing interests;
- b. High cost of required infrastructure and need to fund it upfront;
- c. Large site with long lead in times;
- d. Accessibility to some sites.

Actions

- a. Maintain the project team to progress the delivery of the site (completed for Dunton Hills Garden Village project team);
- b. Produce a Masterplan Framework and/or an SPD where necessary to reduce uncertainty for landowners and speed up development at the site;
- c. Enter into a PPA agreement with the landowners;
- d. Set out a timetable for pre-application discussions.

Improve communication with agents and developers to identify issues affecting housing delivery

Improved communication with agents and developers will lead to better understanding and identifying issues affecting housing delivery so as to ensure that planning permissions and site allocations can actually deliver the homes that people need. This is particularly important where a site failed to progress despite promotion by the Council through an allocation in the Local Plan or has ground to a halt after planning permission has been granted and/or implemented. In such circumstance, the Council will work proactively with developers, landowners and agents to bring forward development to deliver the homes we need.

Actions

- a. Continue to monitor the development pipeline;
- b. Build up relationships with agents and developers. Maintain dialogues between planning officers and stakeholders to monitor any issues affecting housing delivery.

Stepping up the housing requirement

The high proportion of designated Green Belt within the Borough makes it extremely difficult to achieve a five-year supply due to the fact that many sites on the edge of settlements are not available for development purposes until the emerging Local Plan is adopted. As identified in the latest Five Year Housing Supply statement, a greater proportion of the required homes is likely to be delivered in the period beyond 2024, when the sites on the edge of settlements begin to benefit from the detailed planning consents, enabling infrastructure and construction commences on these sites. Therefore, further consideration would be given to 'stepping up' the housing trajectory which uses different housing requirements for different years in the plan. This approach is detailed in the emerging Local Plan³.

Actions

Ensure the housing delivery target of 7,752 homes is met fully within the plan period in accordance with government guidance by stepping up the housing requirement.

³ www.brentwood.gov.uk/localplan