



# Five Year Housing Land Supply Statement as at 31 March 2018

November 2018

## Introduction

1. This statement sets out how the Council calculates its five-year housing land supply. In doing so it reports on the housing completions at 31 March 2018 and the supply of deliverable sites for the subsequent five-year period, 1 April 2018 to 31 March 2023.

## Background

2. The National Planning Policy Framework (NPPF), revised 24 July 2018, requires local authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

## Deliverable Housing Supply

3. The Council has produced and published an accompanying Five-Year Housing Supply Sites Schedule which identifies specific sites that have been assessed as having a realistic prospect of delivery within the five year period.
4. The Sites Schedule provides information which includes the planning status of sites, whether works have started and the projected phasing of the delivery of units on each site. All sites included in the Sites Schedule are not subject to any constraints that would jeopardise their development by 2023. A summary of the Sites Schedule is shown in Table 1.
5. In considering a deliverable supply the Council has applied a 10% non-implementation discount to all sites with planning permission and prior approvals. The discount is used to safeguard against the fact that a proportion of sites may not start in the five-year period and that their permission will lapse.

**Table 1:** Deliverable Supply as at 31 March 2018

	Dwellings
Sites with planning permission subject to section 106	223
Extant planning permissions on unallocated large sites	103
Extant planning permissions on small sites	230
Prior Approval (residential)	417
Non-implementation discount (10% of supply)	-97.3
Allocations – Regulation 19 Local Plan	819
<b>Total</b>	<b>1694.7</b>

## Housing Requirement

6. The Government introduced a standardised methodology for calculating local housing need alongside the NPPF in July 2018. This calculates local housing need using the national household growth projection and applying an affordability adjustment. To limit increases there is a potential cap dependant on the status of relevant strategic policies for housing.
7. Under the standardised methodology it is not necessary to factor in previous levels of under delivery into the calculation of local housing need, since any such under delivery will be reflected in the affordability adjustment. This is confirmed in Planning Practice Guidance: Housing Need Assessment, which states:

*“The affordability adjustment is applied to take account of past under delivery. The standard method identified the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately.”*

(Paragraph 017, Reference ID: 2a-017-20180913)

8. Government guidance on calculating local housing need is set out in ‘How is the minimum annual local housing need figure calculated using the standard methodology’ (Ministry of Housing, Communities and Local Government, July 2018). Using this approach, the local housing need for Brentwood Borough calculates as 343 homes per year, the detailed calculation is set out in Table 2 (please see the guidance for further explanation).

**Table 2:** Local Housing Need (as at October 2018)

	Dwellings
Projected households 2018	32,119
Projected households 2019	34,566
Projected increase in households 2018-2028	2447
Annual projected increase in households 2018-2028	244.7
<b>Median house price 2017</b>	
Median house price 2017	405,000
<b>Median workplace earnings 2017</b>	
Median workplace earnings 2017	36,068
Ratio	11.23
<b>Adjustment factor - applied to projected increase in households 2018-2028</b>	
Adjustment factor - applied to projected increase in households 2018-2028	0.7
Adjustment factor	415.99
<b>Projected increase in households 2018-2028 capped at 40%</b>	
Projected increase in households 2018-2028 capped at 40%	3,425.80
Annual capped housing need for 5 year supply	342.58
<b>Total</b>	<b>343</b>

### Buffer

9. The NPPF requires that the supply of specific deliverable sites should in addition to local housing need include a buffer (moved forward from later in the plan period of:
  - a) 5% to ensure choice and competition in the market for land; or

- b) 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
  - c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.
10. The question of significant under delivery of housing is informed against the Housing Delivery Test. This defines significant under delivery as below 85% of the housing requirement, over the previous three years.
  11. The Government introduced the methodology for calculating local housing need alongside the NPPF in July 2018. It is anticipated that the Government will publish the Housing Delivery Test outcome for all local planning authorities in November 2018, however with the confirmed methodology and the necessary data being available, it is possible to undertake the calculation at the current time. The Housing Delivery Test calculates as 50.83% for Brentwood Borough.
  12. Under the Housing Delivery Test, the Council is required to add an additional buffer of 20% to the local housing need for persistent under delivery, as delivery has fallen below 85% of housing requirement.

## Five Year Housing Land Supply at March 2018

13. The deliverable five-year housing land position for the period 1 April 2018 – 31 March 2023 is set out in Table 3.

**Table 3:** Housing land supply at 31 March 2018

		<b>Dwellings</b>
1	Housing need at 343 homes per year 01/04/2018 - 31/03/2023	1,715
2	Housing need plus 20% buffer for period 01/04/2018 - 31/03/2023	2,058
3	Annual rate for 5-year requirement plus 20% buffer	411.6
4	Total deliverable housing supply for period 01/04/2018 - 31/03/2023	1,694
5	Total deliverable housing supply in years for period 01/04/2018 - 31/03/2023 (4 divided by 3)	4.1

14. On the basis of the five-year housing requirement and the forecasted housing supply Brentwood Borough can demonstrate a suitable supply of housing for 4.1 years.

## Potential for a stepped trajectory

15. The high proportion of designated Green Belt within the Borough (89% of the total Brentwood Borough area) makes it extremely difficult to achieve a five-year supply, due to the fact sites on the edge of settlements, currently within the Green Belt are not available for development purposes until the emerging Local Plan is adopted. As such, it hasn't been possible to identify a five-year housing land supply which delivers the annualised requirement.
16. Consequently, a greater proportion of the required homes is likely to be delivered in the period beyond 2023, when the sites on the edge of settlements begin to benefit from the detailed planning consents, enabling infrastructure and construction commences on these sites (assuming adoption of the emerging Brentwood Local Plan in 2019).
17. Therefore, it is clear from the outcomes of this statement further consideration be given to demonstrating a five-year supply for Brentwood through cross-boundary Duty to Cooperate discussion and the consideration of a stepped housing trajectory which uses different housing requirements for different years in the plan, 'stepping up' the housing requirement as the plan progresses.
18. Planning Practice Guidance: Housing and Economic Land Availability Assessment, sets out how a five-year land supply is measured where authorities have a stepped rather than annual average requirements; it states:

*“Five-year land supply is measured across the plan period against the specific stepped requirements for the particular 5 year period. Stepped trajectories will need to ensure that planned housing requirements are met fully within the plan period.”*  
(Paragraph 017, Reference ID: 2a-017-20180913)
19. Table 4 sets out the Regulation 19 Pre-Submission Local Plan housing delivery target of 7,752 homes a year (456 homes a year over the 17-year Plan period), together with annualised projected housing completions. It is clear from a comparison of this data an initial stepped requirement of 310 homes per year to 2023, followed by a higher stepped up requirement of 584 homes per year for the remainder of the plan period, is a logical approach to take given the circumstances described above.
20. This approach to stepping up the housing requirement would ensure that the housing delivery target of 7,752 homes is met fully within the plan period in accordance with government guidance.

**Table 4:** Comparison of annualised housing delivery target and projected completions

Local Development Plan Period (Year)																	Total
16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	
<b>Housing Delivery Target (Reg 19 Local Development Plan)</b>																	
456	456	456	456	456	456	456	456	456	456	456	456	456	456	456	456	456	<b>7,752</b>
<b>Projected Housing Completions (Reg 19 Local Development Plan)</b>																	
150	213	117	337.5	366.6	402.6	475	723.4	756	702	720	524	586	536	406	386	386	<b>7,787</b>
<b>Stepped Requirement</b>																	
150	213	310	310	310	310	310	584	584	584	584	584	584	584	584	584	584	<b>7,752</b>

**Table 5:** Stepped Housing Trajectory 2016 – 2033



**www.brentwood.gov.uk**  
**email:** [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)  
**telephone:** 01277 312 500

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Planning Policy Team, Town Hall, Ingrave Road, Brentwood, Essex CM15 8AY

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