

Examination of the Brentwood Local Plan 2013-33 **F5C Housing Need Topic Paper**

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1 Introduction

- 1.1 This short paper clarifies and expands aspects of the Council's evidence on Brentwood's housing need. It responds to representations received in the Reg 19 consultation on the Brentwood Local Plan, which took place in February - March 2019, and to the Inspectors' Initial Questions to the Council, issued on 1st June 2020.
- 1.2 The paper takes account of the latest available information, including new data releases and the progress of Local Plans in neighbouring areas. It considers the housing need and requirement of 7,552 net new dwellings against the requirements at paras 35 and 60 of the National Planning Policy Framework (NPPF):
- 35 ... *Plans are 'sound if they are:*
 - a) *Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs¹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development...*
 - '60 *To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.*
- 1.3 Below, Chapter 2 considers the borough's housing need as determined by the standard method in National Planning Practice Guidance (PPG). Chapter 3 looks at the needs of neighbouring areas and Chapter 4 discusses whether standard-method housing need should be uplifted to take account of Crossrail. Chapter 5 summarises our conclusions.
- 1.4 The Local Plan proposes large-scale residential development at Dunton Hills Garden Village. That strategic allocation is not discussed in this paper. The rationale behind it is set out in a separate Green Belt Topic Paper, which explains that this planned concentration of development will ensure that the borough's housing need can be met without any further development in the Green Belt.

¹ Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 60 of this Framework

2 Housing need and the standard method

ISSUES

- 2.1 Policy SP02 of the submitted plan sets a housing requirement (target) of 7,752 net new dwellings to be built over the plan period, equal to 456 dwellings per annum (dpa). The Inspectors in their Initial Questions (para 42) have asked the Council to clarify how this figure has been calculated and what housing need figure it is based on.
- 2.2 Also in relation to Policy SP02, several consultees note that Local Housing Need (LHN), measured by the current standard method, is 452 dpa, so the margin of requirement over need is only an insignificant 4 dpa. Some point out that when the plan was drafted the standard-method LHN was only 350 dpa, so the requirement of 456 dpa provided a margin, or buffer, of 106 dpa. Now that the LHN has increased to 452 dpa, they suggest that the target should also be increased, so that the original buffer is restored, providing insurance against delays in delivery.

HOUSING NEED AND REQUIREMENT IN THE DRAFT PLAN

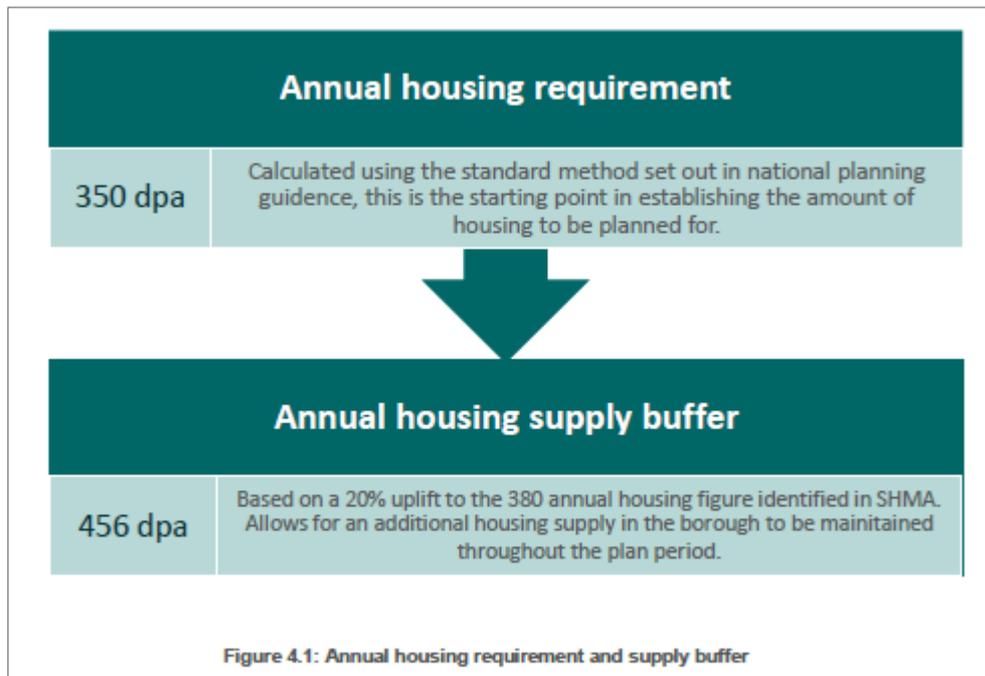
- 2.3 To begin with the Inspectors' question, the plan was produced in January 2019 and launched for Reg 19 consultation on 14th February 2019. At that time, under the standard method provided in National Planning Practice Guidance, housing need was calculated from the 2016-based official household projections, which for Brentwood produced the figure of 350 dpa mentioned earlier. But the government in October-December 2018 had consulted on a revised method, which would use the much higher 2014-based projections instead, and for Brentwood would produce a need of 452 dpa. The draft plan refers to that government proposal in supporting text:

'4.14 The Council is committed to planning positively for new homes to help significantly boost the supply of housing to meet the needs of the area. Taking into account the government's ambitions for housing growth, it is appropriate to consider the government's response document to the revised NPPF, and its intention to adjust the standardised methodology to ensure that the starting point in the plan-making process is consistent with ensuring that 300,000 homes are built per year by the mid-2020s nationally².

² Ministry of Housing, Communities and Government (2018) Government response to the draft revised National Planning Policy Framework consultation: A summary of consultation responses and the Government's view on the way forward. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728498/180724_NPPF_Gov_response.pdf

4.15 Mindful of the above and to provide flexibility in the supply of housing sites, helping boost delivery, the Council proposes to allocate development sites in the Local Plan to provide an uplift from the 350 dpa minimum housing requirement.'

- 2.4 In short, the plan's housing requirement, as set in early 2019, was based on the standard-method LHN of 350 dpa, plus a margin to cover the possibility that a new standard method would increase the LHN. The Council added that margin in a spirit of positive planning.
- 2.5 The size of the contingency margin is explained at Figure 4.1 of the plan, reproduced below, which the Inspectors have asked the Council to clarify.



Source: Brentwood Local Plan Pre-Submission Document

- 2.6 The calculation pictured above proceeded in two steps. At the first step it lifted the standard-method number of 350 dpa to 380, based on the advice in the Strategic Housing Market Assessment produced by PBA (now Stantec) in October 2018. When the SHMA was written, the standard method had been consulted upon, but its introduction had not yet been confirmed. The SHMA advised on the method and its implications as follows³:
- i It noted that the method was likely to come into effect shortly, producing a housing need of 350 dpa, derived from the 2016-based official projections – which had come out a fortnight before the SHMA was completed.
 - ii It added that the government considered the 2016-based needs too low across England, and would shortly begin a new consultation, with a view to revising upwards the brand-new standard method.
 - iii It also estimated that this revised method might produce a housing need of 380 dpa, or possibly more – though the actual number was unpredictable.

³ The SHMA's discussion of household projections is at para 4.39 onwards.

- iv It concluded (at para 9.5) that the plan should plan for at least 380 dpa, and this figure should be reviewed just before the plan was submitted.

At the second step in Figure 4.1, the plan increased the 380 dpa by 20%, to guard against further contingencies. The SHMA supported this approach;

'9.8 ...we note that the Council is proposing to make additional land allocations over and above 'need' (20% above our 380 number). Such an approach, for flexibility or other local reasons, is supported in the Guidance and should more generally be welcomed. In this case overprovision compared to the minimum need should provide additional flexibility in the supply and delivery of sites. It also provides an even greater "buffer" should the Standard Method increase above 380.'

- 2.7 In the event, just days after the SHMA was published the Government did launch a consultation on a revised standard method. Its proposal was to revert to the 2014-based household projections. Following the consultation, the government implemented that proposal, through revisions to the PPG issued on 20 February 2019 – six days after the draft plan was issued for consultation. As noted earlier, the revised standard method produces a need of 452 dpa for Brentwood, much higher than the SHMA's 380 dpa. But the new need does fit within the plan's requirement of 456 dpa.
- 2.8 In summary, the draft plan's housing requirement is based on the housing need of 350 dpa assessed by the previous version standard method, plus a margin of 106 dpa to insure against future contingencies, including future changes in the standard method. In the event, the standard method did change, producing a large increase in the assessed need, to 452 dpa. The contingency margin proved just sufficient to cover the increase. Consequently the proposed requirement of 456 dpa delivers the Local Housing Need calculated by the current standard method as required by the NPPF.

ALTERNATIVE DEMOGRAPHIC PROJECTIONS

- 2.9 As noted in the Introduction, the Framework also advises that in exceptional circumstances housing need might be assessed by a different method, which should also reflect demographic trends and market signals. Neither the Council nor any objector considers that such exceptional circumstances apply. But alternative evidence on demographic trends is mentioned in representations from the Greater London Authority (GLA). The representations support the plan, but also note that the Authority's latest demographic modelling provides alternative population and household projections for all local authorities in England, which *'could also be taken into account when applying the standardised approach'*.
- 2.10 The GLA projections were considered in the 2018 SHMA, at table 4.4 and paras 4.27 onwards. The SHMA found that the latest version available at the time, which was released in July 2017 and was 2016-based, showed household growth well below the 2014-based official projections – which are the basis of the current standard method calculation.

- 2.11 In October 2018 , after the SHMA was completed, the GLA issued a new set of 2016-based household projections, titled ‘Research Outputs’. Explanatory text explains that the new Research Output projections use a new ONS household model to convert the central GLA central trend population projection into households. The text adds that those projections are provided for information and comparison purposes only, and do not supersede the version reviewed in the SHMA. Nevertheless we have looked at the results, to see if they might have implications for Brentwood.
- 2.12 For Brentwood in the period 2019-29, on which the standard-method calculation is based, the GLA Research Output projections show growth of 254 households per annum. Again this is well below the 323 households per annum shown in the 2014-based official projections, which are the basis of the current standard method. (By way of context, for the same period annual household growth in the 2016-based official projections is 250; in the new 2018-based official projections it is 34.)
- In summary, all the available GLA household projections show considerably lower household growth than the 2014-based official projections that are the starting point of the standard method calculation. If we applied the affordability adjustment to translate them into housing need, they would produce a need considerably lower than the LHN. To justify such a lower figure, in line with para 015 of the Guidance⁴ it would have to be demonstrated at examination, *‘using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method.*
- 2.13 In our opinion there it is very unlikely that this could be demonstrated. Therefore the GLA demographic projections do not provide a suitable starting point for assessing Brentwood’s housing need.

IS THE HOUSING REQUIREMENT FIT FOR PURPOSE?

- 2.14 As discussed earlier, the background to the proposed housing requirement is complicated, due to a series of changes in government guidance and official household projections. The timing of these changes was unfortunate in relation to the plan timetable. But the simple outcome is a housing requirement that meets the assessed Local Housing Need, in line with national policy and guidance. Representations on behalf of CEG state the position clearly:
- ‘The Council’s housing requirement figure is set out in the Plan at 456 dpa and this figure is in excess, albeit only slightly, of the standard method figure (452 dpa) using the 2014 projections and is sufficient. The requirements of national policy are met and the plan is sound.*
- The Council states that in including its “annual housing supply buffer” on top of the 350 dpa (derived from use the standard method calculation using the 2016 projections) it serves to safeguard against any potential uplift to the standard method, this now having materialised. This was a sensible contingency. Considering this*

⁴ Reference ID: 2a-015-20190220

buffer has now effectively absorbed within the updated standard method figure the Council is requested to confirm if its purpose has now been served and it intends to submit the plan to examination with the housing requirement as currently stated.'

3 The needs of neighbouring areas

ISSUES

- 3.1 A number of objectors maintain that the plan's housing requirement should be increased to absorb unmet need from neighbouring authorities in. Icení, on behalf of E&A Strategic Land, supports this view with detailed evidence, aiming to demonstrate two related points. The first point is that, contrary to the findings of the SHMA, Brentwood is not a free-standing housing market area (HMA)⁵. The second is that neighbouring areas, specifically Basildon, Havering and London as a whole, have unmet needs that Brentwood should make provision for.
- 3.2 Whether Brentwood is a free-standing HMA makes no difference to the emerging Local Plan, because the concept of HMAs has now been removed from national policy and guidance. In the 2012 NPPF, local planning authorities within an HMA were collectively responsible for assessing and meeting the area's housing needs, as part of the Duty to Cooperate. Under the 2019 Framework, this has been replaced by the requirement at para 35 quoted earlier, that authorities should accommodate unmet need from neighbouring areas where this is practical and sustainable.
- 3.3 Nevertheless, for the sake of completeness, in the next section we briefly respond to Icení's discussion of HMAs.
- 3.4 In the next section we discuss housing market geography in the context of the present Framework, considering which neighbouring areas have the closest links to Brentwood, such that 'exporting' their needs to Brentwood is likely to be practical and sustainable. We then go on consider how far those areas have unmet needs and how their Councils propose to deal with them. Finally in this chapter we consider if there is unmet need in one further authority, Castle Point – which is not as closely linked to Brentwood, but is of interest because it has had Duty to Cooperate discussions with Brentwood Council in the past.
- 3.5 An essential point to bear in mind is that no neighbouring authority has asked Brentwood to accommodate its unmet need. Therefore there is no reason why the plan should provide for such needs. Consequently the analysis in this section is somewhat academic, as there are no specific proposals for Brentwood to 'import' unmet need, whose practicality and sustainability we could assess.

THE HOUSING MARKET AREA

- 3.6 The 2018 SHMA updated the findings on market geography of the previous SHMA, produced by David Couttie Associates (DCA). Both studies concluded that Brentwood qualified as a housing market area in its own right. In the 2018 SHMA this finding was based on migration and commuting data from the 2011 census, which remain the most up-to-date evidence (for new data we must await the 2021 census).

⁵ Basildon Council made a similar point in earlier consultations in 2016, referring to evidence that Brentwood was part of a South Essex HMA. However, Basildon has not put forward this view in the latest Local Plan consultation.

- 3.7 Iceni challenge the SHMAs' conclusions, maintaining that Brentwood doesn't meet the containment threshold in the 2014 PPG – which is that within an HMA *'typically 70%'* of house moves should occur within the area's boundary. Both SHMAs estimate that Brentwood meets this criterion, with migration containment around 80%. Iceni says that this is an overstatement, because the SHMAs only take account of a selection of neighbouring authorities, comprising Braintree, Chelmsford, Colchester, Maldon, Epping Forest and Basildon (see for example Table 3.1 in the 2018 SHMA). Iceni point out that, if all cross-boundary moves are taken into account, Brentwood's migration containment is around 40%, far below the 70% threshold in the 2014 PPG. They also note that Brentwood's strongest migration flows connect it to London Boroughs, rather than the Essex authorities covered by the SHMAs' analysis.
- 3.8 The simple answer to these criticisms is that in the 2014 PPG the 70% threshold excluded long-distance moves and those due to a change of lifestyle:
- 'The findings can identify the areas within which a relatively high proportion of household moves (typically 70%) are contained. This excludes long distance moves (e.g. those due to a change of lifestyle or retirement), reflecting the fact that most people move relatively short distances due to connections to families, friends, jobs, and schools.'*⁶
- 3.9 The SHMAs interpreted the above to exclude moves from local authority areas beyond Braintree, Chelmsford, Colchester, Maldon, Epping Forest and Basildon. They excluded flows to and from Essex districts further away, and also flows to and from London, which they considered long-distance or due to lifestyle changes. This is why the 2018 SHMA (para 3.14) emphasised that the containment analysis relates to **'local moves'**. This choice of geography of course is a matter of judgment, as the PPG does not define 'long distance' or 'a change of lifestyle', and in any event there are no data on the lifestyle changes associated with house moves.
- 3.10 Iceni make another criticism of the SHMAs' market geography: that it takes no account of the HMAs defined by Newcastle University (CURDS) in 2010, which places Brentwood in a London Housing Market Area. They point out that PBA (now Stantec), in technical advice published by the Planning Advisory Service, suggest that the CURDS geography should be the starting point for defining HMAs.
- 3.11 We still consider that in general the definition of HMAs should start from the CURDS analysis. But in the particular case of London that analysis does not give a useful answer, because the London HMA defined by CURDS is much too large. The area is pictured in Figure 4.1 of the Iceni report. It extends beyond Oxford, Southampton, Horsham, Canterbury and Ipswich. For the practical purpose of delivering the Guidance it was always necessary to define smaller HMAs.
- 3.12 Such definitions inevitably involve judgment and choice, because for any one local authority there are many possible HMAs that can meet the 70% threshold and other criteria in the 2014 PPG. Under that guidance, from those various overlapping possibilities each local authority had to choose a single one, as to join several HMA groupings would not have been practical, for obvious reasons. In the case of

⁶ Paragraph: 011 Reference ID: 2a-011-20140306

Brentwood the Council's choice, informed by the SHMA, was that the borough should operate as a separate HMA – while of course recognising links with other HMAs, given that containment is relative, and no area is a wholly self-contained island.

One argument in favour of this choice is that neighbouring authorities take the same view. The 2018 SHMA (para 3.17 onwards) provided an analysis of development plans and supporting evidence across Essex and London, which showed that no local authority considered itself to be in an HMA with Brentwood. We have looked at the latest documents and found that this position has not changed. In particular, the emerging new London Plan in its latest iteration takes the same view as the adopted London Plan, that *'for the purposes of the plan, London is considered as a single housing market area'*⁷. The conclusion of the 2018 SHMA remains valid, that

'Brentwood is on the edge of a number of HMAs but does not neatly form part of any HMA'.

- 3.13 Perhaps surprisingly, Iceni seem to agree with this conclusion. Their representations, while criticising the SHMA's definition of the market area, do not propose an alternative. Instead, their analysis of market geography concludes with:

'Iceni accept that there are practical issues for the purposes of HMA preparation for defining housing market geographies around London, given that the GLA defines the London HMA as conterminous with London's regional boundary. Whilst this may justify the preparation of evidential studies on a borough basis, it does not justify in any way arguments that the HMA geography means it would not be appropriate to accommodate unmet housing needs from either London or other adjoining authorities in Essex.'

- 3.14 Fortunately, the practical issues in defining HMAs need no longer concern us, because as noted earlier the concept of HMAs has been removed from national policy and guidance. To see which authorities might have a prima facie case for exporting unmet need to Brentwood (or indeed exporting unmet need from Brentwood), in the next section we make a new analysis of migration flows.

MIGRATION FLOWS

- 3.15 The table below shows domestic migration (people moving house within the UK) between Brentwood and other local authority areas in the 12 months to census day 2011. Despite their age, these are still the most recent data available. (In the 2018 SHMA, the migration analysis at Table 3.1 used the same source, but a different approach, driven by the containment criterion in the PPG.)
- 3.16 As a full list would be far too long, the table below shows the 10 local authority areas that produced the net largest inflows into Brentwood, and at the other extreme the 10 areas that received the largest outflows from Brentwood.

⁷ London Plan, Intend to Publish version, December 2019, para 4.1.2. HMAs are still relevant to the emerging new London Plan, because it was examined under previous versions of the NPPF and PPG, due to transitional arrangements.

Table 3.1 Domestic migration across local authority boundaries to and from Brentwood in the 12 months to census day 2011
10 largest net inflows / outflows

Local authority	To Brentwood from	From Brentwood to	Net to Brentwood	Combined to and from Brentwood
Havering	682	290	392	972
Redbridge	230	43	187	273
Barking and Dagenham	102	36	66	138
Newham	77	29	48	106
Waltham Forest	63	28	35	91
Thurrock	121	89	32	210
Harlow	50	20	30	70
Epping Forest	158	140	18	298
Enfield	20	8	12	28
Haringey	17	7	10	24
...				
Uttlesford	20	41	-21	61
Suffolk Coastal	0	24	-24	24
Rochford	29	56	-27	85
Canterbury	20	49	-29	69
Southend-on-Sea	32	63	-31	95
Portsmouth	9	42	-33	51
Colchester	41	82	-41	123
Braintree	41	111	-70	152
Basildon	290	405	-115	695
Chelmsford	237	409	-172	646

Source: ONS

3.17 The dominant flow of migration is outward from London, with people moving from east London boroughs to Brentwood, and from Brentwood to Essex districts further east. The largest inflows to Brentwood, both in gross and net terms, are from the London Boroughs of Havering and Redbridge. The largest outflows from Brentwood, both gross and net, are to Chelmsford and Basildon. If we look at the combined number of moves, summing flows into Brentwood and out of Brentwood, the six largest figures are for the same four authorities, plus Epping Forest and Thurrock - for which inflows and outflows are quite evenly balanced, so net migration is low. Flows to and from other areas are much smaller.

3.18 By any reckoning, therefore, the six local authorities with the strongest migration links to Brentwood are:

- Havering and Redbridge in London.
- Basildon, Chelmsford, Epping Forest and Thurrock in Essex.

- 3.19 These six authorities are the most likely candidates to export any unmet housing needs to Brentwood (they are also the most likely to import unmet need from Brentwood, depending on which places produce unmet need and which places have the sustainable capacity to accommodate it):
- If the London Boroughs delivered housing over and above their assessed need, other things being equal they would produce less out-migration to Brentwood than is implied by Brentwood's assessed need (remembering that the assessment is based on projections, which roll forward previous migration trends).
 - If Essex districts to the east delivered housing over and above their assessed need, other things being equal more people would move out of Brentwood to those districts than is implied by Brentwood's assessed need (which, again, rolls forward past migration trends).

UNMET NEEDS IN NEIGHBOURING AREAS

- 3.20 Below, we look at the latest planning policy and evidence in the six 'likely candidate' authorities, to see if they have unmet needs that potentially might be exported to Brentwood. The analysis builds on the 2018 SHMA (paras 3.17 onwards), expanding and updating it where necessary. We then look at housing need in Castle Point, which is not a 'candidate authority, but is of interest because it has held Duty to Cooperate discussions with Brentwood Council in the past.

HAVERING

- 3.21 The draft Havering Local Plan 2016-31 was examined in May 2019. Policy 3 of the plan aims to deliver at least 17,550 new homes. This number is based on the minimum target of 1,170 per year in adopted (2015) London Plan, times the 15 years in the plan period. The London Plan provides targets for only 10 years, 2015-25, but advises that they be rolled forward to cover the remaining Local Plan period. In May 2019 the examining Inspector wrote that she was '*currently minded to accept that this approach to the overall housing target in the Plan is justified and sound*'⁸.
- 3.22 The examination is suspended while the Council is working with the Inspector to prepare consultation on Main Modifications relating to other matters.

REDBRIDGE

- 3.23 The Redbridge Local Plan 2015-30 was adopted in March 2018. The Inspector's report confirms that the minimum requirement of 16,458 new dwellings at Policy LP2 covers the requirement of the adopted London Plan – which is rolled forward over the Local Plan period, in the same way as for Havering. The Inspector adds that:
- 'A draft of the new London Plan was published for consultation, but the final version of that document is some way off and, in particular, the housing target for Redbridge has not been settled. There is still too much uncertainty about this, and over the*

⁸ Examination into the Havering Local Plan 2016-31, Inspector's Matters Issues and Questions, For further hearing sessions May 2019 ((Update re Policy 6)

implications of Brexit, to warrant any adjustment to the current London Plan target. Policy LP2 is accordingly justified.⁹

LONDON

3.24 For London as a whole the latest iteration of the emerging New London Plan says:

*'Although this Plan is seeking to accommodate the majority of London's future growth within its boundary, given the pressure for growth in both London and the WSE, the barriers to housing delivery that need to be overcome to avoid a further increase of the backlog, and potential changes to projections over time, it is prudent to also plan for longer-term contingencies. Therefore, the Mayor is interested in **working with willing partners** [Mayor's emphasis] beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital.'¹⁰*

3.25 In short, the London Plan aims to minimise the quantum of unmet need that London will export to other places, and if exports are necessary it aims to agree them with willing partners, rather than force unwilling hosts to accept them.

BASILDON

3.26 Basildon's Revised Publication Local Plan 2014-34 was submitted to the Secretary of State in March 2019. Its supporting text (para 6.19 onwards) indicates that it will have unmet need of some 4,000 homes over the plan period – the difference between need of around 19,500 (whether measured by the old or new method) and expected delivery of some 15,500. The plan suggests that this need will be accommodated elsewhere in the South Essex HMA:

6.19 The SHMA Addendum, identifies an objectively assessed need (OAN) for housing of up to 4,000 homes to be delivered in South Essex every year in order to support both housing need and the needs of economic growth. This housing target is made up of the cumulative requirements of the five authorities of Basildon, Castle Point, Rochford, Southend-on-Sea and Thurrock that consist the housing market area. [South Essex] The Joint Strategic Plan will address the matter of housing distribution between these authority areas once adopted, including any redistribution.'

3.27 Basildon Council has not specifically asked Brentwood to accommodate any of its housing need, although this may change in future as the Joint Strategic plan evolves.

3.28 It is important to note that Brentwood is not part of the South Essex HMA – which was defined by the 2016 South Essex SHMA and did not change in the update that was the SHMA Addendum 2017. Nor is there anything else in the Basildon plan to suggest that Brentwood is expected to take any of Basildon's unmet need.

⁹ The Planning Inspectorate, Report to the Council of the London Borough of Redbridge, 24 January 2018, para 32.

¹⁰ London Plan, Intend to Publish version, December 2019, para 2.3.4

CHELMSFORD

- 3.29 The Chelmsford Local Plan 2013-36 was adopted on 27th May 2020. Strategic Policy S6 makes provision for 805 dpa to cover the assessed housing need in full. The plan also over-allocates land, providing a 20% buffer for the sake of flexibility.

EPPING FOREST

- 3.30 The Epping District Local Plan 2011-33 was submitted in September 2018. Policy SP2 of the plan sets the housing requirement at a minimum of 11,400 new dwellings, which is below the assessed need of 12,573 dwellings. Supporting text (para 2.14 onwards) notes that Epping Forest is part of the Essex and East Herts Strategic HMA, which also covers East Herts, Harlow and Uttlesford. It adds that the HMA authorities have signed a Memorandum of Understanding which shows that the District cannot meet its full need due to constraints, and its resulting unmet need will be met elsewhere in the HMA. The examining Inspector supported the policy, noting that the requirement should not be increased, given the constraints on development in the district and her concerns about some of the allocated sites.

THURROCK

- 3.31 Thurrock Council is working on a new Local Plan, of which the most recent version is the Issues and Options (Stage 2) document, published for consultation in December 2018. The document noted that the future scale of housing development for Thurrock will be determined through the Joint Strategic Plan (JSP) for South Essex. It went on to say that the district's housing need, based on the standard method current at the time, was 1,173 dpa- which might change if the standard method changed; and added that to set a housing target below that standard-method need

'would require the Council to approach neighbouring authorities through the Duty to Cooperate process and through the preparation of the JSP to see if they are able to accommodate all or part of Thurrock's unmet housing need. Initial discussions with neighbouring local authorities indicate that, at present, this is unlikely to be the case'.

- 3.32 In short, the most recent iteration of Thurrock's Local Plan indicates that the borough expects to meet its standard-method housing need in full, without resorting to help from neighbouring authorities.

CASTLE POINT

- 3.33 Castle Point and Brentwood Council in 2018 and 2019 held Duty to Cooperate discussions regarding potential unmet housing need in Castle Point. However, on the latest evidence there will be no such unmet need.
- 3.34 On 22 October 2019, Castle Point Council agreed to proceed with the Pre-submission Local Plan and Policies Map to a Regulation 19 public consultation. The New Castle Point (Pre-submission) Local Plan and Policies Map was out for a public consultation from Monday 16 December 2019 to Friday 14 February 2020. It is the Council's intention to submit the Local Plan for Examination in Public in the summer of 2020. The pre-submission draft of the plan at para 9.6 states:

*'This Plan identifies land for 5,284 new homes. This exceeds the OAN by 154 homes and equates to 352 new homes per annum. This exceeds the target of 342 homes per annum. Therefore, there is no unmet need which other local planning authority areas need to include within their emerging local plans.'*¹¹

SUMMARY

- 3.35 Our analysis above has found that two of the six 'likely candidate' authorities currently have identified unmet housing needs, Epping Forest and Basildon. Both expect those needs to be accommodated by neighbours in their respective housing market areas, neither of which includes Brentwood. In Epping Forest, the transfer of unmet need has been supported by the Local Plan Inspector. In Basildon, the emerging Local Plan advises that unmet need will be redistributed across the HMA by the Joint Strategic Plan for South Essex (which is currently at the Early Issues Consultation stage).
- 3.36 We have also looked at housing need in Castle Point, which is not a 'candidate' authority, but is of interest because it has held Duty to Cooperate discussions with Brentwood about possible unmet need in Castle Point. We have found that there is no such unmet need, as Castle Point Council now plans to meet all their need within its own boundaries.
- 3.37 In London, under the targets set in the adopted London Plan, the two boroughs most closely linked to Brentwood, Havering and Redbridge, do not have unmet needs. The emerging new London Plan sets new targets, which in future are likely to lead to unmet need for London as a whole – though we do not know how individual boroughs will be affected. Those future unmet needs are not relevant to Brentwood's Local Plan today. They may result in additional housing provision at Brentwood's next Local Plan review. But this would be a voluntary choice, because the Mayor of London will only seek help from '*willing partners*'.

¹¹ New Castle Point Local Plan, Pre-submission Plan 2018-2033, December 2019

4 The impact of Crossrail

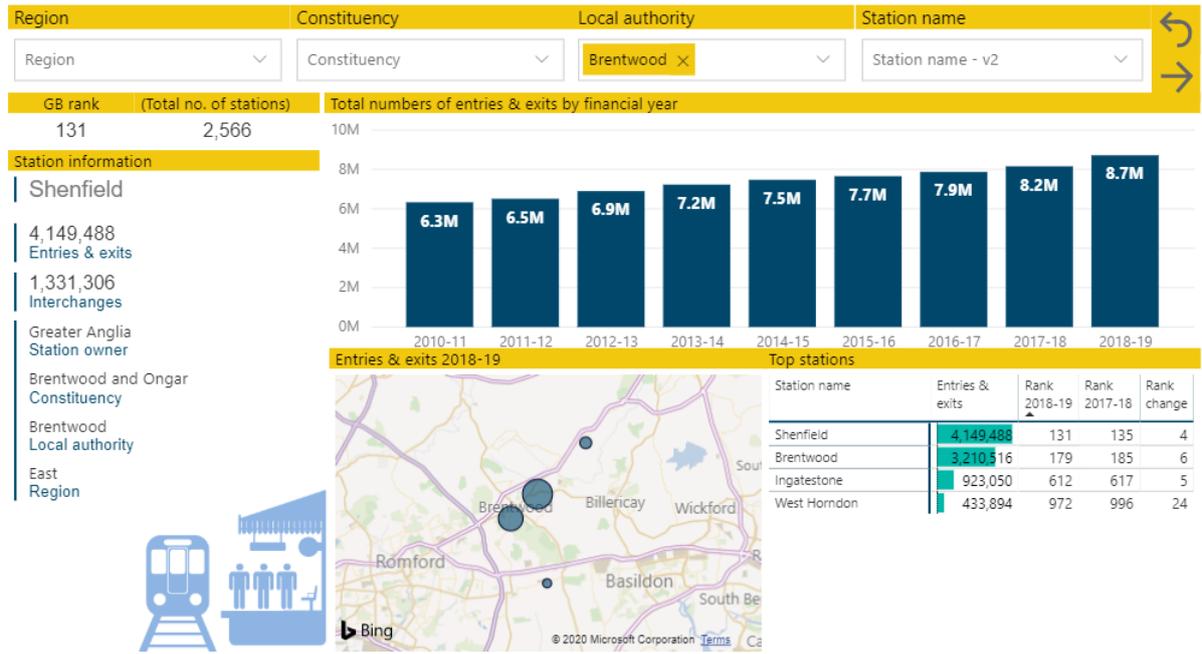
- 4.1 One consultation response, from Icení on behalf of E&A Strategic Land, refers to PPG advice that indicates that strategic infrastructure improvements may drive increased housing need, over and above the standard-method number. The document maintains that this applies to Brentwood, due to the opening of Crossrail 1 (the Elizabeth Line) – which will dramatically expand railway capacity, and slightly improve travel times. It provides an estimate of the additional homes needed, starting from the forecast in the Council’s Transport Assessment, that Crossrail will increase passenger numbers at Brentwood and Shenfield stations by around 10%, mainly due to increased population rather than modal shift. This figure is translated into numbers of additional commuters and then into numbers of homes. The analysis concludes that those 1,005 homes should be added to the assessed housing need and requirement.
- 4.2 This line of reasoning is incorrect, because it doubles counts the passenger growth that will be accommodated by Crossrail:
- As is common for major infrastructure investments, the primary rationale for the new railway is that capacity should increase to accommodate the population growth that is expected for the future.
 - The additional commuters who will use the railway are not additional to the population projection that underlies the Local Housing Need calculation. Rather, they are part of that population projection. Crossrail provides transport for them, just as the Local Plan provides homes for them.
 - If this additional transport capacity were not provided, the expected population growth (in Brentwood and elsewhere) might not happen, or it might happen at the cost of unacceptable congestion on the railways. If it does not happen, the borough could need fewer homes than it is currently planning for.
- 4.3 That Crossrail is planned to accommodate predicted population growth, is obvious from the summary business case for the project. At para 2.3, it states three objectives of the project, taken from the Mayor’s Transport Strategy, of which the first is
- ‘To support sustainable economic development and population growth by increasing transport capacity, reducing congestion on the transport network’¹².*
- 4.4 That expected population growth drives transport investment, is also mentioned at para 2.6-2.7 and Figure D in the summary business case. Here, the document notes the population and employment growth forecast in the then London Plan, and that without Crossrail they would result in growing congestion and crowding on the network.
- 4.5 That future investment is needed to cater for continuing growth, is also illustrated by Figure 5.1 in the Icení representations. The figure charts usage of Brentwood and Shenfield stations, which in future will be served by Crossrail. It shows steady growth at both stations from 1997/98 to 2017/18, except for a brief dip in the recession (the

¹² Crossrail Business Case Update: Summary Report, July 2011.

same history of growth is shown by the chart on page 15. That history reflects the past population growth that the demographic projections carry forward into the future. (However, Figure 5.1 says nothing about the impact of Crossrail, because it covers a period in which Crossrail did not exist; its heading, '*Entries and Exits at key Crossrail Stations*', is misleading.)

- 4.6 In short, the population growth that Crossrail will support is already included in the demographically projected population that the Local Plan provides for. In fact the Plan provides more homes than the projected population will require, because the affordability uplift standard formula uplifts the demographic projections by 40%. If, hypothetically, the Crossrail business plan and the Local Plan were based on the same population projections, Crossrail would need to be expanded beyond current plans, to accommodate the additional future population resulting from the affordability uplift. If Crossrail were thus expanded, Icení would presumably say that the Local Plan should provide even more housing to match the additional transport investment, initiating a new round of circular reasoning.
- 4.7 To put the above discussion in context, it will be helpful to keep a sense of proportion about the scale of improvement that Crossrail may bring. Rail usage in Brentwood borough is some 9m entries and exits a year, at four stations of which the two largest, Shenfield and Brentwood, will be served by Crossrail. Both these stations are predominantly used by commuters into the City of London and Canary Wharf, and Crossrail will affect them differently:
- For users of Shenfield station (who account for some 4m entries and exits annually), Crossrail will provide little if any benefit against the existing Greater Anglia service. That service offers very frequent semi-fast trains that run to Stratford in less 15-20 minutes and Liverpool Street in less than half an hour. By contrast, Crossrail, which of course is a stopping service, will take over 30 minutes to Stratford and over 40 minutes to Liverpool Street.
 - For users of Brentwood station (3m entries and exits), Crossrail will take over the existing stopping service. Travel times will not change, but frequency and hence capacity will increase dramatically – so trains will not get more crowded, and may get less crowded, as the population grows.
- 4.8 To sum up, Brentwood is already a highly attractive location for commuters into London. Crossrail will not dramatically increase that attractiveness, because it will not reduce travel times. Its main benefit to Brentwood will be to avoid growing traffic congestion for users of Brentwood station as the population grows. That population growth is already accounted for in the existing housing target. Therefore, it cannot justify an uplift in the housing target.

Usage of rail stations in Brentwood



Source: Office of Rail and Road (ORR), Estimates of Station Usage
<https://dataportal.orr.gov.uk/statistics/usage/estimates-of-station-usage/>

5 Summary

- 5.1 This short paper clarifies and expands aspects of the Council's evidence on Brentwood's housing need. It responds to representations received in the Reg 19 consultation on the Brentwood Local Plan and to the Inspectors' Initial Questions to the Council.

HOUSING NEED AND THE STANDARD METHOD

- 5.2 Policy SP02 of the submitted plan sets a housing requirement (target) of 7,752 net new dwellings to be built over the plan period, equal to 456 dwellings per annum (dpa). The Inspectors in their Initial Questions (para 42) have asked the Council to clarify how this figure has been calculated and what housing need figure it is based on.
- 5.3 Also, in relation to Policy SP02, consultees note that Local Housing Need (LHN), measured by the current standard method, is 452 dpa, so the margin of requirement over need is only an insignificant 4 dpa. Some point out that when the plan was drafted the standard-method LHN was only 350 dpa, so the requirement of 456 dpa provided a margin, or buffer, of 106 dpa. Now that the LHN has risen to 452 dpa, they suggest that the target should also be lifted, so the original buffer is restored.
- 5.4 In reply to the Inspectors' question, the draft plan's housing requirement is based on the housing need of 350 dpa assessed by the previous version standard method, plus a margin of 106 dpa to insure against future contingencies, including future changes in the standard method. In the event, the standard method did change, producing a large increase in the assessed need, to 452 dpa. The contingency margin proved just sufficient to cover the increase. Consequently, the proposed requirement of 456 dpa delivers the Local Housing Need calculated by the current standard method as required by the NPPF.
- 5.5 In response to the objectors' point, contingency margin, or buffer, is no longer needed, because the uncertainty it was insuring against has been resolved.
- 5.6 The background to the proposed housing requirement is complicated, due to a series of changes in government guidance and official household projections. The timing of those changes was unfortunate in relation to the plan timetable. But the simple outcome is a housing requirement that meets Local Housing Need, in line with national policy and guidance.

THE NEEDS OF NEIGHBOURING AREAS

- 5.7 A number of objectors maintain that the plan's housing requirement should be increased to absorb unmet need from neighbouring authorities. Icení, on behalf of E&A Strategic Land, supports this view with detailed evidence, aiming to demonstrate two related points. The first point is that, contrary to the findings of the SHMA,

Brentwood is not a free-standing housing market area (HMA)¹³. The second is that neighbouring areas, specifically Basildon, Havering and London as a whole, have unmet needs that Brentwood should make provision for.

- 5.8 In relation to housing market areas, we demonstrate in Section 3 above that Icení's challenge to the SHMAs is unfounded. More important, we show that whether Brentwood is an HMA makes no difference to the emerging Local Plan, because the concept of HMAs has now been removed from national policy and guidance. In the 2012 NPPF, local planning authorities within an HMA were collectively responsible for assessing and meeting the area's housing needs, as part of the Duty to Cooperate. Under the 2019 Framework, this has been replaced by a requirement that authorities accommodate unmet need from neighbouring areas where this is practical and sustainable.
- 5.9 In regard to unmet need, in the Reg 19 Local Plan consultation no local authority has asked Brentwood to accommodate its unmet housing need. Therefore, there is no reason why the plan should provide for such needs.
- 5.10 Nevertheless, in Section 3 above we identified the local authorities that hypothetically might consider exporting unmet need to Brentwood in the future, if they had such needs. These authorities are the London boroughs of Havering and Redbridge and the Essex districts of Basildon, Chelmsford, Epping Forest and Thurrock. We then looked at the latest planning position to see if they currently have unmet needs, and if so, how they plan to deal with them.
- 5.11 Our analysis finds that two of the six authorities most closely linked to Brentwood currently have unmet housing needs, Epping Forest and Basildon. Both expect those needs to be accommodated by neighbours in their respective housing market areas, neither of which includes Brentwood. In Epping Forest, the transfer of unmet need has been supported by the Local Plan Inspector. In Basildon, the emerging Local Plan advises that unmet need will be redistributed across the HMA by the Joint Strategic Plan for South Essex.
- 5.12 Also in Section 3, we considered housing need in Castle Point district – which is not as closely linked to Brentwood as the areas discussed above, but is of interest because Castle Point and Brentwood Councils have held discussions in the past about possible unmet need in Castle Point. In the event such unmet need does not arise, because the latest iteration of the Castle Point Local Plan shows that the district expects to meet its need in full within its own boundaries.
- 5.13 In London, under the targets set in the adopted London Plan, the two boroughs most closely linked to Brentwood, Havering and Redbridge, do not have unmet needs. The emerging new London Plan sets new targets, which in future are likely to lead to unmet need for London as a whole – though we do not know how individual boroughs will be affected. Those future unmet needs are not relevant to Brentwood's Local Plan today. They may result in additional housing provision at Brentwood's next Local Plan

¹³ Basildon Council made a similar point in earlier consultations in 2016, referring to evidence that Brentwood was part of a South Essex HMA. However, Basildon has not put forward this view in the latest Local Plan consultation.

review. But this would be a voluntary choice, because the Mayor of London will only seek help from '*willing partners*'.

- 5.14 To sum up, there is no reason why the Brentwood Local Plan should make provision for unmet housing needs from neighbouring local authority areas. No authority has asked for such help, and the authorities most closely linked to Brentwood either have no unmet needs or have made other arrangements for accommodating their unmet needs.

THE IMPACT OF CROSSRAIL

- 5.15 Iceni, on behalf of E&A Strategic Land, say that the opening of Crossrail (the Elizabeth Line) will make Brentwood a more attractive place to live; this will increase housing need by an estimated 1,005 homes over the plan period; and the housing numbers in the Local Plan should be uplifted accordingly.
- 5.16 This argument is not right, because it double counts the passenger growth that will be accommodated by Crossrail. The future new commuters counted by Iceni are not additional to the population projection that underlies the Local Housing Need calculation. Rather, they are part of that population projection. Crossrail provides transport for them, just as the Local Plan provides homes for them.
- 5.17 Brentwood is already a highly attractive location for commuters into London, due to the existing rail services. Crossrail will not dramatically increase that attractiveness, because it will not reduce travel times. Its main benefit to Brentwood will be to avoid growing traffic congestion for users of Brentwood station as the population grows. That population growth is already accounted for in the existing housing target. Therefore, it cannot possibly justify an uplift in the housing target.