



Brentwood Monitoring Report Housing Delivery 2021/22

November 2022

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Introduction

1. The introduction of the Localism Act (2011) and updates to the Town and Country Planning Regulations 2012 removed the requirement for local authorities to send an Annual Monitoring Report to the Secretary of State. However, the act retains the overall duty to monitor the implementation of the Local Development Scheme and the extent to which policy targets are being achieved in the Local Plan.
2. The Act allowed for more flexibility when monitoring and amended the name Annual Monitoring Report to “Authorities Monitoring Reports”, reflecting the fact that information can be published as and when it becomes available.
3. This monitoring update reports on themes related to housing supply and delivery for the period 1 April 2021 to 31 March 2022.
4. This report is primarily based on the established structure of previous monitoring updates, which have been centred upon the ‘saved’ policies of the Brentwood Replacement Local Plan (2005). On the 23 March 2022 the Council voted to adopt the Brentwood Local Plan 2016-2033, this now forms part of the statutory development plan and supersedes the Brentwood Replacement Local Plan (2005). As such this will be the last monitoring update produced in this format.
5. In future monitoring updates all Local Plan policies will be monitored in line with the ‘Monitoring Framework’ as set out in Appendix 3 of the Brentwood Local Plan 2016-2033.

Summary of Key Findings

- The gross number of new homes completed in the period was 454, with a net gain of 407 new homes. This marks a significant uplift from past completion trends.
- 279 of the new homes (gross) were completed on large sites (sites of 10 or more units) and 175 homes (gross) were completed on small sites.
- 96% of gross completions were built on previously developed land (PDL). This figure is reflective of recent trends in the borough.
- The total dwellings delivered via Change of Use permitted development rights for this monitoring year accounts for 53% (217 dwellings) of total (net) completions. This has primarily been a result of officer to residential conversions.
- In terms of supply prior approvals account for 41.5% (642 dwellings) of total housing supply (as at 1 April 2022).
- 7 of the 407 (net) new completed dwellings (1.7%) were affordable dwellings, falling significantly short of the annual estimate of affordable housing need in Brentwood which is calculated as 107 households per year.
- When taken as a percentage of total completions, windfalls account for 45% of net completions between 2009 and 2021/22.
- Within the monitoring period a total of 82 (use class C2) spaces have been completed.
- The required 5-year supply of deliverable land for traveller accommodation is met.

Housing Completions

Annual Completions

6. Table 1 shows the number of homes completed in Brentwood Borough since 2010.
7. During 2021/22 a total of 407 net additional dwellings were completed. The net figures comprise of additions to housing stock from new build, change of use and conversions minus any losses as a result of demolitions, changes of use and conversions.
8. 407 (net) new completed dwellings indicates a notable increase in completions in comparison to previous monitoring years.

Table 1: Housing completions by dwelling size and previously developed land (PDL) 2010 to 2022

	1bed	2bed	3bed	4+bed	Unknown	Total (Net)	Total (Gross)	No. PDL	%PDL
2021/22	167	109	60	83	-12	407	454	435	95.81%
2020/21	50	32	8	3	75	168	172	156	90.60%
2019/20	46	104	24	26	1	200	201	200	99.50%
2018/19	48	73	22	36	67	246	249	236	94.77%
2017/18	72	81	27	35	-2	213	239	219	91.63%
2016/17	45	83	11	17	-6	150	176	148	84.09%
2015/16	41	31	28	19	-8	111	125	107	85.60%
2014/15	55	79	26	15	-16	159	178	147	82.60%
2013/14	20	53	32	14	-14	105	119	97	81.50%
2012/13	42	117	50	21	-18	211	239	212	88.70%
2011/12	6	55	32	43	-4	132	148	131	88.50%
2010/11	78	249	25	46	-4	394	416	413	99.30%

Note: Not known column –. 2010/11: 4 unknown losses. 2011/12: 4 unknown losses. 2012/13: 18 unknown losses. 2013/14: 14 unknown completions. 2014/15: 16 unknown losses. 2015/16: 3 unknown completions & 11 unknown losses. 2016/17: 6 unknown losses. 2017/18: 2 unknown losses. 2018/19: 67 unknown completion dwelling sizes. 2019/20: 1 unknown dwelling size. 2020/21: 75 unknown dwelling size. 2021/22: 12 unknown losses.

Source: Brentwood Residential Land Monitor

Completions on Previously Developed Land

9. Key to the achievement of sustainable development is making best use of previously developed land (PDL). Previously developed land is often referred to as brownfield whilst undeveloped land is often called greenfield. The National Planning Policy

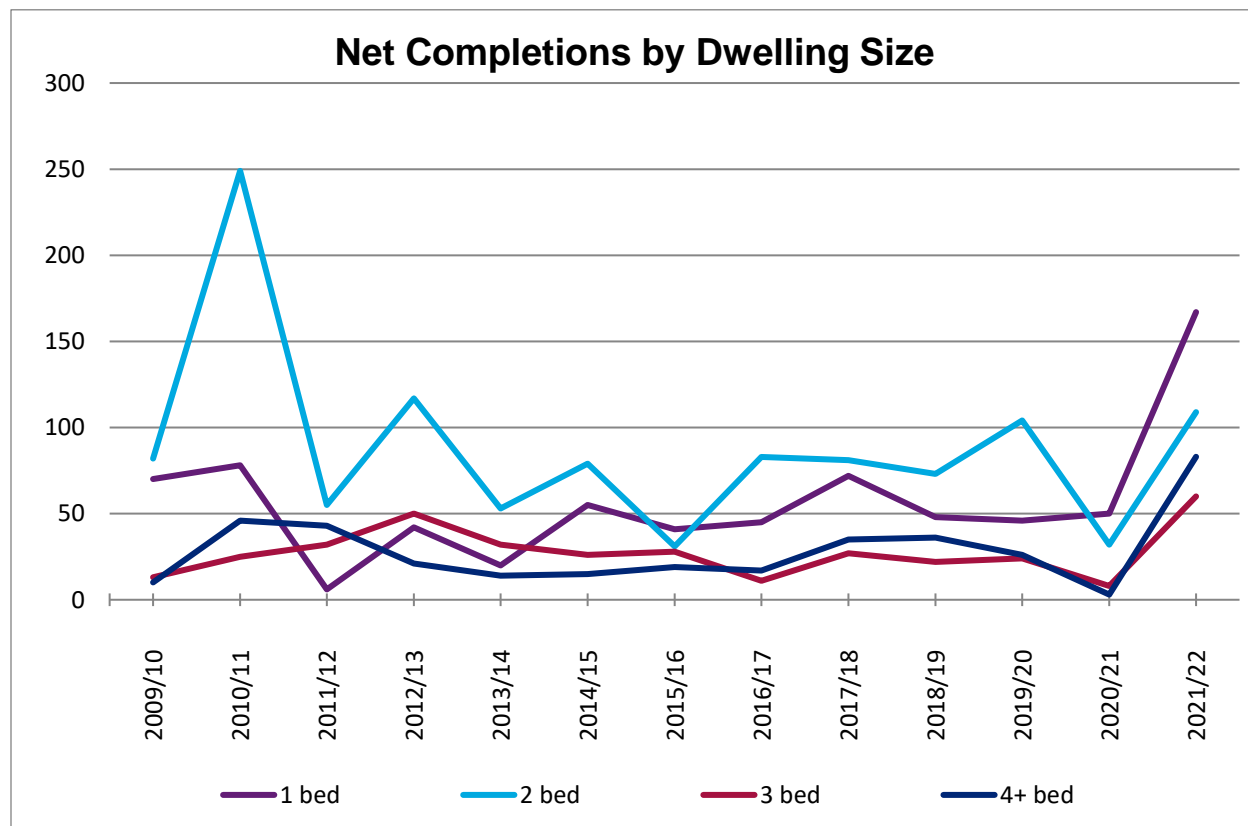
Framework (NPPF) encourages the effective use of land by reusing land that has been previously developed, provided that it is not of high environmental value.

10. As seen in Table 1, the Borough has consistently achieved high proportions of residential development on previously developed land. In the monitoring year 96% of completions were on previously developed land. This is in line with recent years levels of completions on previously developed land, partially resulting from a high proportion of completions of apartments / flats in the urban area.

Completions by dwelling size

11. An important element of the housing supply is to provide a variety of choice in the type and size of accommodation, in order to reflect local need. Table 1 shows housing completions by number of bedrooms. Figure 1 also maps these completions over the past 11 years to better understand trends.
12. Of (net) new completed dwellings 40% were 1 bedroom, 26% were 2 bedrooms, 14% were 3 bedrooms, whilst 4/5 bedroom homes accounted for 20% of total completions. This represents an increase in the number of one-bedroom units from the previous monitoring years, primarily as a result of the large number of conversions granted through Permitted Development Rights from Office (B1) to Residential (C3) over the year.

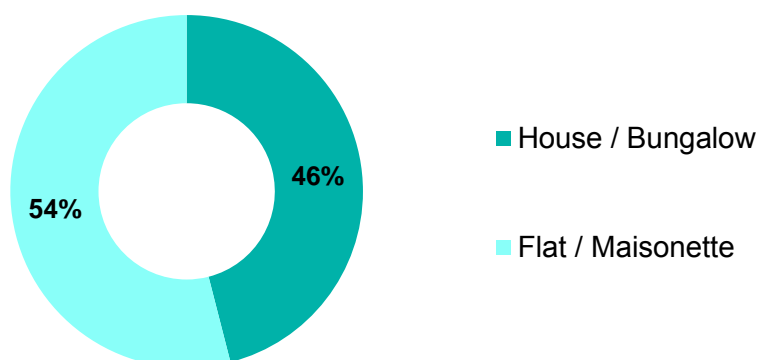
Figure 1: Net Completions by dwelling size 2010 to 2021/22



Completions by dwelling type

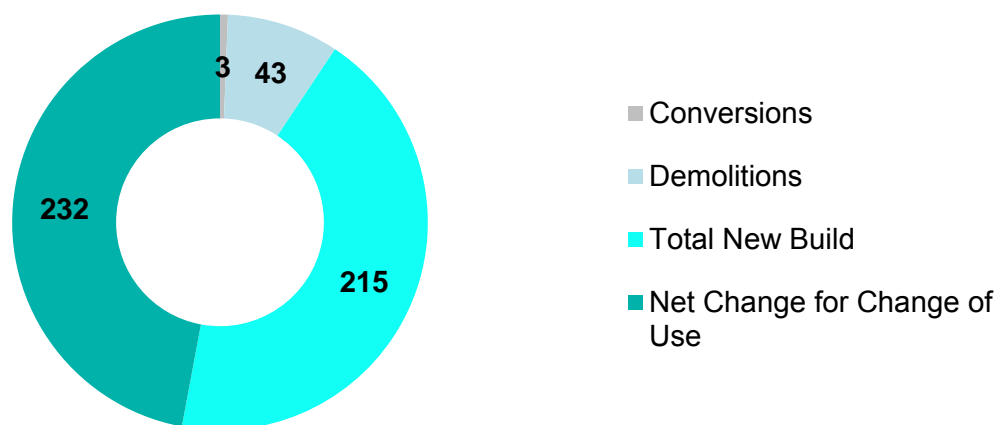
13. Figure 2 shows that the net dwellings completed in 2021/22 were relatively evenly split between flats and houses. The high number of flats completed is a trend continued from the previous monitoring year, and one that reflects the relatively high percentage of developments that have been completed through Permitted Development rights.

Figure 2: Housing completions (%) by type of dwelling 2021/22



14. Figure 3 shows the changes in dwelling stock in Brentwood Borough over the monitoring period 2021/22, according to new build, conversion, change of use¹, and demolitions.

Figure 3: Changes in dwelling stock 2021/22 - additions and losses

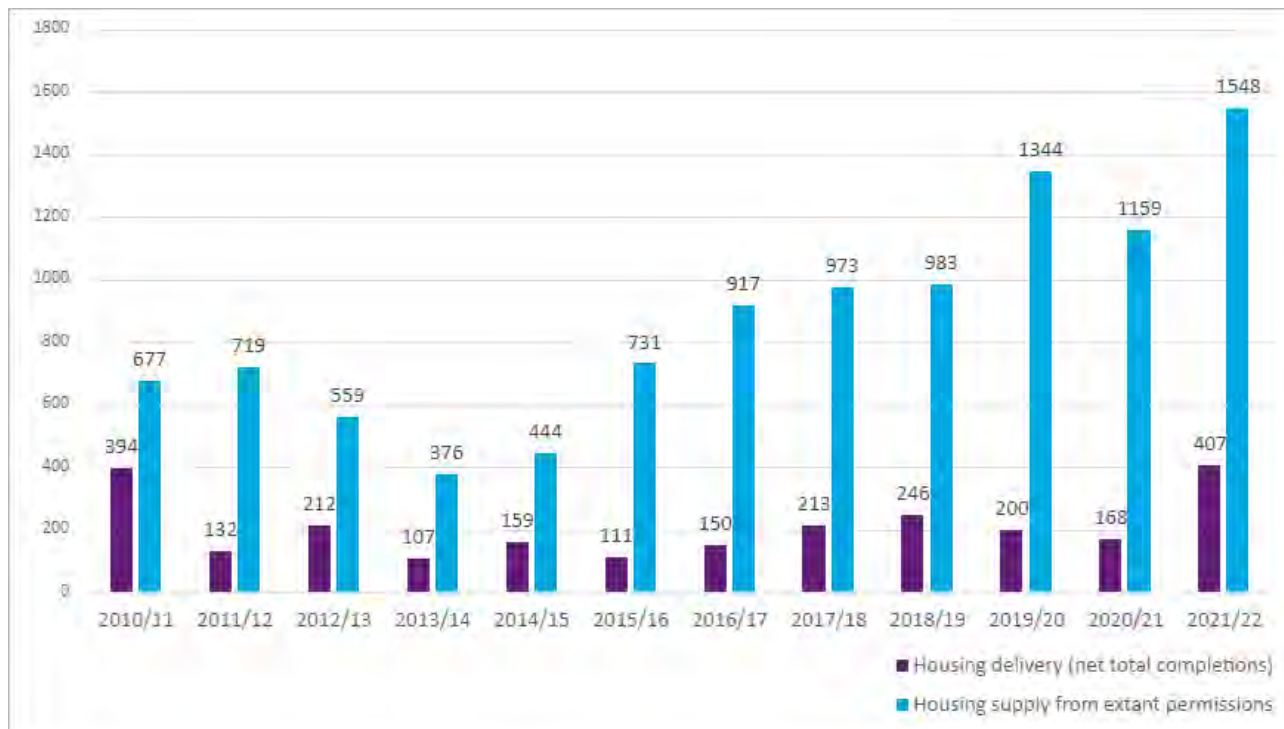


¹ Changes of use refers to the number of dwellings created through the change of use from non-residential buildings and the number of dwellings lost through changes to non-residential use.

Delivery and Supply

15. Figure 4 compares housing delivery and supply each year since 2010. Housing supply consists of planning permissions, those subject to S106, and residential prior approvals (yet to be completed). For the years 2011 to 2013 a marked fall in housing supply can be observed, in part due to a drop in the number of planning permissions on allocated sites, as those allocated for housing within the Brentwood Replacement Local Plan (2005) were largely built out earlier in the plan period. Since 2014 this downward trend in housing supply has reversed, with contribution from increased permission; an uplift in the housing market and development values; and recent changes to permitted development rights.
16. This uplift has been most pronounced in the current monitoring year, which has seen a notable acceleration of completions rates from historic trends, coupled with a noteworthy increase in housing supply from extant permissions.
17. A higher completion rate for this monitoring year is to some degree explained by the large number of conversions granted through permitted development rights over previous years. The total dwellings delivered via Change of Use permitted development rights for this monitoring year accounts for 53% (217 dwellings) of total (net) completions. This has primarily been a result of Office to Residential conversions.
18. In terms of supply prior approvals account for 41.5% (642 dwellings) of total housing supply (as at 1 April 2022).

Figure 4: Housing delivery and supply from extant permissions 2010 to 2021/22



Prior Approvals

19. Over recent years the Government has revised 'permitted development rights' to allow change of use of certain retail units, office and agricultural buildings to be converted into residential use without planning permission, via a prior approval application made to the Council.
20. As reported in Table 2, prior approval applications for the change of use from office to residential buildings make up the majority of completions that have taken place through change of use.

Table 2: Change of use 2021/22

	Total number of dwellings
A: To dwelling from former or current agricultural or forestry buildings	9
A1: Of which under agricultural to residential permitted development right	4
B: To dwellings from other buildings	224
B1: Of which under permitted development right Office to Residential	213
C: Total dwellings delivered via Change of Use permitted development rights (A1 + B1)	217
D: Loss of dwellings to non-dwellings	-1
E: Net change for Change of Use (A + B - D)	232

21. During the monitoring year, three Major prior approval developments (over 10 dwellings) were completed under permitted development right office to residential, as listed below:
 - Regent House, Hubert Road, Brentwood - (Prior Approval Notification Class O - Change of use of Offices Class B1(a) to form 136 apartments (Class C3) (16/00290/NON/1)
 - Floors 1-5, Ewing House, Kings Road, Brentwood - Prior Approval Notification Class O - Change of use of floors 1-5 from office space Class (B1(a)) to residential use to create 50 residential units Class (C3) (20/00301/PNCOU)
 - 11 Queens Road, Brentwood - Change of use from B1a offices to 11no. flats (7no. one bedroom and 4no. two bedroom) (20/00433/PNCOU)

Affordable Housing

22. Delivery of sufficient affordable homes is an important issue within the borough. The affordability ratio² for Brentwood Borough is 13.2, meaning the median house price in the borough in 2020 is 13.2 times median gross annual workplace-based earnings. Housing affordability in Brentwood has worsened to a greater degree than any other authority in Essex.
23. The annual estimate of affordable housing need in Brentwood is calculated as 107 households per year, as set out in the Strategic Housing Market Assessment Part 2 (SHMA, 2016). This represents 30.6% of the annual projected household growth in the Borough between 2016 and 2033.
24. The supply of affordable housing is variable from one year to another, as shown in Table 3. Only 7 of the 407 (net) new completed dwellings in the monitoring year were affordable dwellings, falling significantly short of the annual estimate of affordable housing need in Brentwood
25. Affordable housing supply is severely constrained by the Borough's Green Belt location, restricted supply of development land and lack of development finance and public subsidy. In addition, historically much of Brentwood's housing has been provided on small sites below thresholds set out in the now revoked Replacement Local Plan.
26. With the adoption of the Brentwood Local Plan 2016-2033 in March 2022, the delivery of affordable housing on site allocations is projected to increase substantially. All developments of 10 or more are expected to provide 35% affordable housing, this indicator will be monitored closely in future monitoring updates

Table 3: Affordable housing completions 2010/11 to 2021/22

Year	Affordable Housing Units Completed	% of Total Housing Completions
2021/22	7	1.7%
2020/21	0	0%
2019/20	40	20%
2018/19	2	0.81%
2017/18	52	26%
2016/17	22	14.6%
2015/16	16	14.4%
2014/15	19	10.7%
2013/14	0	0%
2012/13	20	16.4%
2011/12	51	34.5%
2010/11	4	1.0%

²

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

Windfall Sites

Windfall Data

27. A windfall site is one that has not been specifically identified as available in the Local Plan process. They usually comprise previously developed sites that have unexpectedly become available and could not have been anticipated when the Local Plan was in preparation, or smaller sites not previously identified. Windfall sites can comprise the development of infill sites, conversion of existing buildings to residential use, redevelopment of residential land to provide a net gain in new units, the net gain in units from the sub-division of existing residential units or the bringing back into use empty or derelict buildings or sites. Occasionally, unused 'greenfield' land is developed for housing and this is also classed as a windfall if not allocated.
28. To ensure there is no double counting within the projected housing figures for Brentwood Borough, no housing sites within this windfall assessment are:
- Allocated sites within the adopted Development Plan;
 - Within the SHLAA (October 2011) / HELAA; or
 - Already granted planning permission for residential use through an existing planning permission. Any permissions which supersede others have not been included.

Historic Windfall Completions

29. The Borough has seen an average net windfall completion rate of 92 dwellings per annum over the last 13 years.
30. Year on year the number of completions on windfall sites has varied. At a peak of 344 net completions during this monitoring period (2021/22) to just 9 net completions in 2011/12. When taken as a percentage of total completions, windfalls account for 45% of net completions between 2009 and 2021/22.
31. With the adoption of the Brentwood Local Plan 2016-2033 in March 2022, it's anticipated the number of non-windfall completions will increase substantially as allocated sites are built out.

Self and Custom Build

32. From 1 April 2016 the Self Build and Custom House Building Act 2015 placed a duty on local authorities to keep a register of people who express an interest in developing land for self-build and custom-built projects.
33. In accordance with national legislation the Council has set up a register and interested parties can complete an online application form from the Council's website. This register helps inform the Council of the level of demand for self build and custom build plots in the Borough and forms a key part of the Council's evidence base informing future local plan preparation.
34. This monitoring update seeks to examine the indicators as set out in Table 5. The data extracted is for the period 31st October 2021 to 30th October 2022.
35. These indicators will be updated in the next iteration of the Council's monitoring update, in line with the 'Monitoring Framework' as set out in Appendix 3 of the Brentwood Local Plan 2016-2033.
36. Inclusion on the register does not entitle a registered person or organisation to a plot and any planning application will need to be in accordance with the policies in the Council's Local Plan.
37. Data collected so far suggests a modest level of interest in self and custom build, as set out in Table 4. A total of 20 individuals and one group have registered during this monitoring period, this is a decrease from last year which recorded 30 new individuals joining the register.
38. The majority of those joining aspire to living in a 4+ bedroom detached house or bungalow. There is mixed preference for location between urban and rural areas.

Table 4: Headline data on the demand for self-build and custom house building (31st October 2021 to 30th October 2022)

Indicators	Number
Number of individuals joining the registered	20
Number of associations registered	1
Preference for the type of custom build plot	
Individual self-build plot	18
Group custom build	1
Developer-led custom build	2
Other	0
Preference for type of house	
Detached House / Detached Bungalow	18
Semi detached House / Bungalow	3
Apartment / Flat	0
Other	0
Preference for the number of bedrooms	
1 bed	0
2 bed	1
3 bed	3
4+ bed	17
Preference for general location	
Town	6
Village	7
Rural	8

Specialist Accommodation

39. Housing for older people and people with disabilities can fall within the C2, C3 or sui generis land use class.
- 'C2' is defined as "residential institutions - residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres"
 - 'C3' is defined as "dwelling houses, formed of three parts:
 - a. A single person or by people to be regarded as forming a single household;
 - b. Not more than six residents living together as a single household where care is provided for residents; or
 - c. Not more than six residents living together as a single household where no care is provided to residents (other than use within Class C4 'Houses in multiple occupation').
 - 'Sui generis' is defined as "uses which do not fall within any use class. Such uses include larger houses in multiple occupation and hostels providing no significant element of care".
40. National planning guidance advises that the future need for specialist accommodation for older people broken down by tenure and type (eg sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (use class C2).
41. The Council's SHMA Part 2 (2016) uses the Strategic Housing for Older People Analysis Tool – SHOP, which is available from the Housing Learning and Improvement Network (LIN). The Elderly Accommodation Council (EAC) classifications are used for the purpose of defining housing³.

Need for Specialist Accommodation for older people (Use Class C3)

42. Both specialist housing (that has been specifically designed to meet the needs of people with particular needs) and extra care housing (designed with the needs of frailer older people in mind and with varying levels of care and support available on site) form part of the Borough's overall housing need and tend to fall within use class C3.
43. The Brentwood SHMA Part 2 (2016) addresses current and future growth in the numbers of specialist housing across all tenures in terms of their related care and support needs. In terms of specialist accommodation for older people; it identifies a

³<https://www.housinglin.org.uk/Topics/browse/HousingExtraCare/ExtraCareStrategy/SHOP/SHOPAT/Dashboard/CurrentNeeds/>

need for 123 affordable and 372 market and extra care houses to be provided between 2013-2033.

Need for Residential Institutions (Use Class C2)

44. This type of housing relates principally to a C2 use class and does not form part of the Borough's overall housing need (although LPA's should count housing provided for older people, including residential institutions in use class C2, against their housing requirement⁴). This is housing for people living in registered care homes which are managed and run by a care provider who is responsible for all aspects of their daily needs and wellbeing. Such housing is not self-contained and is often referred to as either residential or nursing care.
45. The SHMA Part 2 identifies a long-term requirement for an additional 494 spaces within registered care to be provided between 2013-2033.

Monitoring Delivery and Supply

46. Within this monitoring period a total of 77 (use class C2) spaces providing registered care for elderly people have been completed, together with 5 (use class C2) spaces providing specialist supported living accommodation. A total of 55 (use class C2) bed spaces for assisted living are currently under construction.
47. For the purposes of policy monitoring the below distinction between use class has been applied in Table 5⁵:
 - Residential institutions use class C2: Housing for people living in registered care managed and run by a care provider who is responsible for all aspects of their daily needs and wellbeing. Accommodation consisting usually of just a bedroom (and possibly a bathroom) but with everything else communal.
 - Specialist accommodation use class C3: Self-contained accommodation capable of facilitating independent living. Designed to meet particular needs of residents with varying levels of care and support on site.

⁴ National Planning Policy Framework Planning Policy Guidance - Housing and Economic Land Availability Assessment – Methodology – Stage 5: Final evidence base – Paragraph 037 reference ID: 3-037-20140306 – 6th March 2014 <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/>

⁵ For Use Class distinction of each development in individual planning application terms refer to details in planning decision.

Table 5: Planning permission and completions for Specialist Accommodation 2013 to 2022

Site Name/Planning Reference	Accommodation type	Net gain/loss
Specialist Accommodation Use Class C3 completions & losses from 2013		
Homehurst House (20/01169/FUL)	Supported living (units for independent living)	1
Marillac Hospital (11/00149/FUL)	Supported living (units for independent living)	3
25 St Georges Court (13/00967/BBC)	Sheltered accommodation	2
Bermans Close (15/01491/FUL)	Sheltered accommodation (for older people)	3
2 Rayleigh Road (14/00065/FUL)	Supported living (units for independent living)	4
Trueloves Lane (13/00336/FUL)	Supported living accommodation	-10
Total		3
C2 Completions from 2013		
24 Norton Road (16/01729/FUL)	Supported living	5
Rayleigh Close, Hutton (18/00678/REM)	Residential care home (for older people)	77
1 – 4 The Beeches (11/00089/FUL)	Residential care home (for older people)	99
Howard Lodge (10/00724/FUL)	Residential care home (for older people)	20
Total		201
Specialist Accommodation Use Class C3 Extant permissions		
-	-	-
Total		0
C2 Extant permissions		
Rayleigh Close, Hutton (18/00678/REM)	Assisted living	55
Eagle Way, Great Warley (Outline)	Residential care home (for older people)	-
Total		55

Gypsy and Traveller Accommodation

Local Need

48. National policy is clear that Brentwood Borough Council has a duty to identify land to meet the local needs of Gypsies and Travellers. The Council is required to update annually a supply of specific deliverable sites sufficient to maintain a five-year supply of deliverable land for traveller accommodation.
49. The need for gypsy, traveller and travelling showpeople accommodation has been assessed through the Brentwood Borough Council Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2017) (GTAA). This uses a jointly commissioned GTAA methodology prepared for the Essex local authorities and Southend-on-Sea and Thurrock Councils.
50. The GTAA concludes the overall level of additional need for those households who meet the planning definition of a Gypsy or Traveller, is for 11 additional pitches over the period to 2033. The GTAA also sets out the following delivery timeframes required to meet a five-year supply of Gypsy and Traveller sites:

Table 6: Additional need for Gypsy and Traveller households in Brentwood that meet the Planning Definition by 5-year periods (extracted from GTAA 2017)

Years	0-5	6-10	11-15	16-17	Total
	2016-21	2021-26	2026-31	2031-33	
	8	1	1	1	11

51. The need for households who meet the definition increases to 12 additional pitches over the GTAA period to 2033 if a 10% allowance is applied to represent unknown need, as shown in Table 7.

Table 7: Additional need for Gypsy and Traveller households (extracted from GTAA 2017)

Site Status	Gypsy and Traveller Local Plan Policy	SHMA Housing Policy	TOTAL
Meet Planning Definition (+ 10% Unknown)	12	0	12
Not meeting Planning Definition (+ 90% Unknown)	0	66	66
TOTAL	12	66	78

52. Since the GTAA was completed, one existing gypsy and traveller pitch within the Borough has been lost, increasing the need to 13 pitches for the Plan period.
53. Policy HP07 of the adopted Brentwood Local Plan 2016-2033 sets out the identified gypsy and traveller need for 13 pitches and identifies how this will be met.

- 54. Since the adoption of the Brentwood Local Plan in March 2022, a planning application (Ref. 19/00909/FUL) for Oaktree Farm has been received by the Council. The application was for 11 pitches within the site boundary. The application was approved, as it was in accordance with policies HP07: Provision for Gypsies and Travellers and HP09: Subdivision of plots or pitches.
- 55. With the approval of the application, Brentwood has provided more than the required 5-year land supply and close to meeting its full gypsy and traveller needs for the plan period (short by 1 pitch).
- 56. An update on the GTAA for across Essex, including Brentwood, is in the inception stage, with plans for the GTAA document to be updated with site visits and surveys expected to commence in March 2023. This updated evidence and its implications for monitoring will be reported on in future monitoring updates.

Caravan Counts

- 57. Local authorities carry out a count of Gypsy and Traveller caravans twice a year, in January and July, providing a snapshot of caravan numbers on the day of the count. This is then compiled by Government and published on their websiteⁱ
- 58. As the caravan count data is only representative of caravan numbers at one point in time it should not be relied upon to provide estimates of actual need. Instead, data collected in the Council's GTAA should be used to guide future pitch provision. It is also important to note that a caravan and a pitch are not the same, and so the two are not comparable.
- 59. The caravan count for July 2022 includes 89 caravans on authorised sites with permanent permission, 43 on tolerated sites without planning permission and 71 not tolerated sites.

ⁱ www.gov.uk/government/statistics/traveller-caravan-count-january-2022