

Bracknell Forest Housing Land Supply (HLS) calculation as at 1st April 2021 (dated 27 July 2021)

- 1. This Housing Land Supply (HLS) document sets out the position as at 1 April 2021. It also refers to an appeal decision issued on 17 December 2019 relating to Westwood House¹, in relation to the approach to the windfall allowance.
- 2. **Table 1** sets out the Housing Land Supply (HLS) calculation reflecting the position as at 1 April 2021, which indicates that the Council is currently able to demonstrate a 5 year HLS of **4.2 years**. **Table 2** lists the sites forming part of the HLS.

Housing Requirement

- 3. Para. 74 of the National Planning Policy Framework (NPPF, 2021) states that where strategic policies are more than five years old, the local housing need figure should be used to assess five years' worth of housing. The Core Strategy was adopted in 2008 and is therefore more than five years old. Consequently, national policy clearly implies that the Local Housing Need (LHN) figure needs to be used in Bracknell Forest.
- 4. Para. 61 of the NPPF also states that the standard method (as set out in National Planning Practice Guidance (PPG)) should be used as the basis for calculating the minimum housing need. Further guidance is set out in section 2a of the PPG (republished December 2020).
- 5. Therefore, the local housing need for Bracknell Forest is based on the standard method. It uses the 2014-based household projections for the period 2021 2031 (released September 2016²), and the 2020 affordability ratio (published March 2021³) to derive a local housing need figure of 572 dwellings per annum (dpa).

¹ Appeal Decision: APP/R0335/W/19/3229885. Appeal dismissed, relates to 73 assisted living units at Westwood House, Swinley Road, Ascot (planning application 18/00397/FUL).

² 2014-based household projections: 2014-based Household Projections Live Tables; Table 406. See: https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections#based-live-tables

³ 2020 Affordability ratio, Table 5c: (published 25 March 2021): https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplaceb asedearningslowerquartileandmedian

Housing Delivery Test and application of NPPF 'buffer'

- 6. The Government introduced the Housing Delivery Test (HDT) in 2018, with the first results of the HDT published by the Secretary of State in November 2018. The HDT measures the net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data.
- 7. The HDT provides a measure based on the preceding 3 financial years. The current HDT result ('2020 measurement', which was published on 19 January 2021⁴) used data from 2017-18, 2018-19 and 2019-20.
- 8. The data for Bracknell Forest shows that between 2017/18 and 2019/20, the Council delivered a total of 2,956 homes (against a requirement of 1,697), which was 174% of its housing requirement. As housing delivery in Bracknell Forest was above the nationally set threshold of 85% of the housing requirement over the specified period, the Council is not required to add the additional buffer to its 5 year housing supply or produce an action plan. Therefore, in line with para. 74a) of the NPPF, only a 5% buffer is included in the housing land supply calculation.

BFC HLS as at 1 April 2021 (dated 27 July 2021)

⁴ Housing Delivery Test 2020 Measurement: https://www.gov.uk/government/publications/housing-delivery-test-2020-measurement

Deliverable Supply

- 9. All sites contributing to the supply of land over the plan period 2006-2026 (reflecting the position as at 1 April 2021) are set out in the Housing Trajectory, and sites which form part of the 5 year HLS are summarised in **Table 2** of this document.
- 10. The Council considers that the sites forming part of the 5 year HLS are deliverable (as defined by the Glossary of the NPPF, 2021), and there is clear evidence and a realistic prospect that housing completions will begin within five years. Officers visit all sites in order to obtain building progress data (not started, under construction or completed), liaise with case officers, have regard to planning history (progress on other applications linked to the sites such as approval of conditions) and liaise with developers/agents in order to inform the preparation of the Housing Commitments and Housing Trajectory⁵. Large and medium sites are visited quarterly (end of June, September, December and March), and small sites are visited on an annual basis.
- 11. In terms of liaising with developers, an initial email was sent asking how many units were expected to be completed in the next five years (1 April 2021 to 31 March 2026). Whilst it is acknowledged that some responses were received after 1 April 2021, they clearly relate to the relevant 5 year period, so have been used to inform the HLS trajectory.
- 12. It is not considered that the approach taken by the Council is contrary to advice published in section 3 of the PPG (relating to 'Housing Supply and Delivery'), which was published on 22 July 2019⁶. The Council has had regard to the factors listed in the PPG informing the trajectory relating to sites.
- 13. For clarification in relation to the types of sites listed in reference ID 68-007-20190722 of the PPG (types of sites which need further evidence to be considered deliverable), the Council does not include the following sites within the HLS (unless they benefited from a planning permission as at 31 March 2021, and met the definition of 'deliverable'):
 - Sites allocated in a development plan
 - Sites included on the brownfield register
 - Sites listed in the 'Strategic Housing and Economic Land Availability Assessment' (SHELAA)
 - Sites included in Pre-Submission Bracknell Forest Local Plan (relating to the Regulation 19 consultation in March-May 2021).
- 14. No post 31 March 2021 approvals are included within the housing figures (any such schemes will be reflected in future housing commitments/trajectory). Current updated information relates to the position as at 7 July 2021, taking account of any progress on planning applications, and quarterly site visits (quarter one, June 2021) on large and medium sites.

⁵ Housing Commitments and Housing Trajectory as at 1 April 2021: https://www.gov.uk/planning-monitoring/housing-monitoring/housing-monitoring/housing-monitoring/housing-monitoring/housing-supply-and-delivery

Approach to prior approval applications (change of use from office to residential)

- 15. These sites relate to developments which have been granted prior approval change of use from office to residential, under Schedule 2, Part 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (GPDO). Within the housing trajectory, such applications are prefixed '/PAC'. The Council is of the view that these prior approvals do fall within the definition of being 'deliverable'.
- 16. The PPG ('when is permission required') explains that, "Permitted development rights are a national grant of planning permission which allow certain building works and changes of use to be carried out without having to make a planning application. Permitted development rights are subject to conditions and limitations to control impacts and to protect local amenity' (reference ID: 13-016-20140306).
- 17. The above-mentioned 'conditions and limitations' imposed on the prior approvals do not include the requirement for the development to mitigate against its impacts on the Thames Basin Heaths Special Protection Area (SPA). Instead this is a separate regulation outside of the GPDO and the Town & Country Planning Act 1990 (as amended) (TCPA). Therefore, planning permission has been granted to the prior approval developments without limitations under the GPDO, and subsequently benefit from a grant of planning permission.
- 18. The requirement for SPA mitigation for prior approvals falls entirely under the Habitats Regulations regime, and not the GDPO or the TCPA. Accordingly, any enforcement of SPA mitigation falls under a separate regime to planning regulations in the case of prior approvals.
- 19. The trigger point of the SPA mitigation is prior to the occupation of the residential units (this being because the buildings already exist, with internal layout works not normally forming planning development, and therefore the change of use development is only triggered upon active occupation). It is therefore the case that many developers undertake the internal renovation works prior to the completion of the Section 106 for SPA, limiting any overall delay.
- 20. In addition, for the prior approvals the required Section 106 agreements are 'single issue', solely to provide mitigation in the form of Suitable Alternative Natural Greenspaces (SANGs) and contributions towards Strategic Access Management and Monitoring (SAMM) measures. There is sufficient SANG capacity available in the Borough, which can be secured through a Section 106 (normally, in the case of prior approvals, through purchasing SANG capacity from a third party SANG provider, of which there are many options).
- 21. The Council therefore sees no reason why these prior approval developments should not be classed as 'deliverable', and for this reason they form part of the Council's 5 year HLS.

Approach to windfall allowance

- 22. The term 'windfall' relates to sites that have not been specifically identified as available through the local plan process. There has been a change in approach to the windfall allowance to that taken prior to 2018. Previous windfall allowances were based on the definitions of windfall set out in the 2012 NPPF namely:
 - Para. 48 which set out that the windfall allowance should not include residential gardens
 - Annex definition: which set out that windfall sites should not normally comprise previously developed sites (PDL).
- 23. Since the publication of the revised NPPF in July 2018 (and further updates in February 2019, which are incorporated in the July 2021 version) the definition of 'windfall' has changed. The annex definition no longer includes reference to comprising PDL sites, and the replacement para. 48 (now para. 71) does not refer to omitting residential gardens. Therefore, the historic data that the windfall allowance is based on, no longer excludes garden/infill development.
- 24. The Council has assessed the contribution likely to be made by 'windfall' sites based on sites that have not been allocated but that have come forward and been completed over the last ten years. This is updated on an annual basis (therefore the 10 year period changes). The current 10 year period relates to 2011/12-2020/21, and the average completion rate has been calculated (see **Table 3**). Any completions relating to allocated sites identified in the Site Allocation Local Plan have then been removed to give a residual windfall figure.
- 25. Possible changes to those trends have also been considered such as the reduction/exhaustion of certain sources of supply (see below) and changes in policy. It is clear that windfall sites have consistently played an important role in the housing supply of the Borough over a considerable period. The Council acknowledges that in recent years prior approval applications (relating to change of use from office to residential) have made a contribution towards the windfall allowance. However, taking a precautionary approach to reflect the fact that this source may not continue to deliver at current rates, only 25% of completions through prior approvals for small and medium sites have been included (i.e. deduction of 75%) in the windfall figure to give a remaining net balance (rounded) as follows:
 - 24 dpa (net) for small sites (less than 5 units/less than 1ha,
 - 76 dpa (net) for medium sites (5+ units/less than 1ha).
- 26. Small sites with outstanding planning permissions are not listed in the Housing Trajectory the windfall allowance is relied upon for projections of future completions.
- 27. Medium sites with outstanding planning permission are however listed in the Housing Trajectory. To avoid double counting, no allowance is included for the first two years of the projected five year figures and only 50% of the allowance is included for the third year of the projected figures. These assumptions are based on an analysis of the time taken to complete a medium sized site. In relation to large sites, no windfall allowance has been included. If such sites come forward, they will be reported through the monitoring process.
- 28. The Westwood House Inspector (para. 58) gives endorsement to the Council's approach to windfall "the Council has taken a precautionary approach to windfalls which is robust and consistent with the advice in the Framework....". The approach to the current 10 year period is even more precautionary than the appeal position, as now only 25% of prior approval office conversions are included (previously 50% were included).

Table 1: Five year supply as at 1 April 2021

1. Setting the baseline of Local Housing Need (LHN) 2014-based projections ⁷ , over period 2021-2031		
Bracknell Forest average annual projected household growth	451.9	(56,608-52,089) /10
2. An adjustment to take account of affordability	0.266	[Local affordability ratio-4)/4] x0.25
Bracknell Forest median workplace-based affordability ratio 20208: 8.26		, -
3. Minimum annual local housing need figure	572	(1+adjustment factor) x projected household growth
Housing requirement over next 5 years	2,860	572 x 5
(based on LHN figure of 572)	2,000	372 X 3
TOTAL requirement over next 5 years		
LHN requirement (no shortfall as based at 2021)	2,860	
Plus NPPF 5% buffer	3,003	Plus 5% (in line with NPPF)
Annual requirement over next 5 years	600.6	
Deliverable supply (Projected completions 2021/2022-2025/26)	2,531	
5 year Housing Land Supply	4.21	2,531/601
Deficit	-472	(2,531-3,003)

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⁷ 2014-based Household Projections Live Tables; Table 406. See: https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections#based-live-tables

⁸ 2020 Affordability ratio, Table 5c: (published 25 March 2021): https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian

Table 2 – sites contributing towards the 5 year HLS

Site Address	No.	Projected Net Completions (April-March)						
	Bedrooms (C2 use - net)	2021/22	2022/23	2023/24	2024/25	2025/26	Total Net	Site Status (as at April 2021)
(1 April 2021 position) * = new permission in the 2020/21 moni u/c = under construction n/s = not started	toring year							
C3 USES (NB, this does not include 0 within C3 use, see separate table)	C3 specialised	uses relatin	g to senior liv	/ing/extra cai	e/sheltered a	iccommodati	on falling	
HARD COMMITMENTS (C3 uses: non Large Sites hard commitments (C3 uses		ialiand\ (sita	of the or mo	ro)				
Amen Corner North, Binfield	ses. non-spec	63	0	0	0	0	63	UC
(SALP SA6)								
Blue Mountain Golf Club & Conference Centre, Wood Lane, Binfield (SALP SA7)		70	70	70	52	16	278	UC
Land at Tilehurst Lane, Binfield		0	10	22	21	0	53	NS
Wyevale Garden Centre, Forest Road, Binfield (The Walled Garden)		10	10	0	0	0	20	UC
Jennetts Park (formerly Peacock Farm), Peacock Lane, Bracknell		0	0	25	0	0	25	UC
Land at former Garth Hill College Site, Sandy Lane (access off Hutley Drive) (Part of SALP Policy SA1) (Millennium Fields, Phase 2)		49	0	0	0	0	49	UC
Aspect 1-3, Wokingham Road (Blu Bracknell)		24	0	0	0	0	24	UC
The Hideout, West Road (Badgerwood Park)		10	10	10	10	10	50	UC
Land at former TRL Site, Nine Mile Ride, Crowthorne. (SALP SA5) (Buckler's Park)		76	100	100	100	100	476	uc
Land west of Alford Close and 96-98 High Street (SALP SA3) (Sandhurst Gardens)		10	0	0	0	0	10	UC
Land North of Harvest Ride and South of Forest Road and East of West End Lane, Warfield. (SALP SA9, Part of Area 2)		75	75	75	0	0	225	uc
Land East of Avery Lane and North of Watersplash Lane, Warfield (SALP Policy SA9 Area 1) (Orchids Place)		25	25	11	0	0	61	UC
Land south of Fairclough Farm, Newell Green, Warfield (SALP Policy SA9 Area 1) (Archfield)		15	15	12	0	0	42	UC
Kingswood, Kings Ride, Winkfield		13	6	0	0	0	19	UC
White Gates, Long Hill Road, Winkfield		-1	13	0	0	0	12	NS
Winkfield Park (Brockhill House, Winkfield Row, Winfield		0	10	0	0	0	10	NS
Total Large Sites (C3 uses: non-specialised)		439	344	325	183	126	1417	

Site Address	No. Projected Net Completions (April-March)							
	Bedrooms (C2 use - net)	2021/22	2022/23	2023/24	2024/25	2025/26	Total Net	Site Status (as at April 2021)
Medium Sites hard commitments (C3 (sites less than 1ha with 5+ dwellings		ecialised)						
Brackworth, Broad Lane, Bracknell	,	8	0	0	0	0	8	UC
Blythe House, Great Hollands Square, Bracknell		0	0	6	0	0	6	NS
Racal House, Eastern Road, Bracknell (SALP SA1, part of Eastern Rd allocation)		0	0	26	34	0	60	NS (Demolition complete)
Amber House & Northgate House, Market Street, Bracknell		0	55	81	57	0	193	UC (Demolition complete)
Dennis Pilcher House, Rowley Close, Bracknell		9	0	0	0	0	9	UC (demolition complete)
Building B Berkshire Court, Western Road, Bracknell		46	0	0	0	0	46	UC
Summit House, London Road, Bracknell		0	4	4	0	0	8	UC
Bus Depot and Offices, Coldborough House, Market Street, Bracknell (The Grand Exchange)		0	106	136	0	0	242	UC (demolition complete)
The Braccans, London Road, Bracknell		14	0	0	0	0	14	UC
Land At East Lodge, Great Hollands Road, Bracknell		0	0	9	0	0	9	NS
Clifton House, Brants Bridge, Bracknell		0	0	14	0	0	14	NS
Forth House, Brants Bridge, Bracknell		0	0	9	0	0	9	NS
Tamar House, Brants Bridge, Bracknell		0	0	9	0	0	9	NS
Blocks A, B and C Christine Ingram Gardens, Bracknell		0	0	6	0	0	6	NS
Manhattan House, 140 High Street, Crowthorne		13	0	0	0	0	13	UC
Manhattan House, 140 High Street, Crowthorne		1	0	0	0	0	1	NS
Liberta House, 17 Scotlands Hill (adj. Cofters Close), Sandhurst		0	9	0	0	0	9	UC
Windmill Farm (including Storage Barn), Malt Hill, Warfield		0	0	5	0	0	5	NS
Land at the Yard, Chavey Down Road (Brickfields), Winkfield		7	5	0	0	0	12	UC
Orchard House, Priory Road, Winkfield		0	0	5	0	0	5	NS
Jade Farm, Winkfield Lane, Winkfield		0	5	0	0	0	5	NS
Land west of Prince Albert Drive, Winkfield		6	0	0	0	0	6	UC
Moat Farm, Winkfield Lane, Winkfield		0	0	12	0	0	12	NS
Total Medium Sites (C3 uses: non-specialised)		104	184	322	91	0	701	
Total Large & medium hard commitments (excludes windfall allowance)		543	528	647	274	126	2118	

Site Address	No.	Projected Net Completions (April-March)						
	Bedrooms (C2 use - net)	2021/22	2022/23	2023/24	2024/25	2025/26	Total Net	Site Status (as at April 2021)
Medium Prior Approval sites (decision granted) pending s.106 in relation to habitat mitigation (C3 uses)								
Continuity House, London Road, Bracknell		0	0	7	0	0	7	NS
Countrywise House, 28 Wellington Business Park, Crowthorne		0	6	0	0	0	6	UC
Total Medium Prior Approval sites		0	6	7	0	0	13	
TOTAL Prior Approval sites, subject to s.106 (C3 uses: non-specialised)		0	6	7	0	0	13	
TOTAL HARD COMMITMENTS (C3 uses: non-specialised) (Large, Medium, Small & PAC s.106)		543	534	654	274	126	2131	
Windfall Allowance								
Medium Windfall Allowance (C3 uses) (net)		0	0	38	76	76	190	
Small Sites Completions/Windfall Allowance (C3 uses) (net)	_	24	24	24	24	24	120	_
Total windfall allowance		24	24	62	100	100	310	
TOTAL SOFT COMMITMENTS (C3 uses: non-specialised)		24	24	62	100	100	310	
GRAND TOTAL (C3 uses: non - specialised)		567	558	716	374	226	2441	
C3 SPECIALISED USES (senior living HARD COMMITMENTS (C3 USES: SPI		eltered acco	mmodation f	alling within	C3 use)			
Calcott, Rectory Close, Bracknell		0	0	2	0	0	2	NS
TOTAL C3 SPECIALISED USES: Hard Commitments		0	0	2	0	0	2	
GRAND TOTAL OF ALL C3 USES (SPECIALISED & NON- SPECIALISED)		567	558	718	374	226	2443	
C2 USES Monitoring has only taken place since (NB for C2 uses, in line with the Housing equivalent number of dwellings, rounded HARD COMMITMENTS (C2 uses) Holly Cottage, London Road,	Delivery Rule	Book (July 20	018), a ratio o		n applied to the	e number of b	edroom space	s to derive an
Popeswood Binfield (12 bed/7 ratio)								
Heathlands Home For The Aged, Crossfell, Wildridings, Bracknell	25	36.70	0.00	0.00	0.00	0.00	36.70	UC
(Demolition of 41 bedspaces/23 dwelling equivalent and 66 new bedspaces/37 dwelling equivalent, net increase of 25 bedspace/14 dwellings)								
Land at former TRL Site, Nine Mile Ride, Crowthorne (SALP SA5) (80 bedspaces/44 dwelling equivalent)	80	0.00	44.44	0.00	0.00	0.00	44.44	UC
TOTAL C2 Hard Commitments	105	43	44	0	0	0	88	
OVERALL TOTAL C2 & C3 USES		610	602	718	374	226	2531	

Table 3 – Windfall allowance data for small and medium sites 2011/12- 2020/21

Windfall a	nalvsis of sn	nall site developme	nts (less than 5 units	/less than 1ha)	
Year		Net number of		Net number of completions	Total Net Figure
			with SALP sites	resulting from PAC change of use	(following deduction of completions
	Completions	SALP sites	deducted	from B1 to C3 applications	
		SALF SILES	deducted	ITOTT BT to C3 applications	involving SALP sites, and 75% of B1 to C3
					prior approval applications)
2011-12	16	0			
2012-13	18	0			
2013-14	11	0		0	11
2014-15	26	0		6	21.5
2015-16	31	0	31	1	30.25
2016-17	39	0	39	7	33.75
2017-18	40	0			
2018-19	18	0			
2019-20	29	0			
2020-21	28	0		0	
Total	256	0		-	
_	25.60	-			-
Average	25.00	0.00	23.00	1.80	24.23
Windfall	nalveic of m	dium cito dovolore	monte (5.10 unito/les	s than 1ha)	
			ments (5-10 units/les		T-4-1 N-4 E:
Year	Total net	Net number of		Net number of completions	Total Net Figure
	completions	completions on	with SALP sites	resulting from PAC change of use	(following deduction of completions
		SALP sites	deducted	from B1 to C3 applications	involving SALP sites, and 75% of B1 to C3
					prior approval applications)
2011-12	5	0	5	0	
2012-13	14	0		•	
2013-14	-15	0			
2014-15	26	0			
2015-16	58	0		_	
2015-10	31	0		0	
				•	
2017-18	-16	0			-
2018-19	31	0		8	
2019-20	21	0		0	
2020-21	27	0		0	
Total	182	0	182	32	158
Average	18.20	0.00	18.20	3.20	15.80
Windfall a	nalvsis of me	edium site developr	nents (10+ units/less	than 1ha)	
Year	Total net	Net number of		Net number of completions	Total Net Figure
		completions on	with SALP sites	resulting from PAC change of use	(following deduction of completions
	Completions	SALP sites	deducted	from B1 to C3 applications	
		SALF SILES	deducted	ITOTT BT to C3 applications	involving SALP sites, and 75% of B1 to C3
					prior approval applications)
2011-12	9	0		*	
2012-13	100	0		0	
2013-14	16	0		0	
2014-15	73	0	73	0	73
2015-16	5	-1	6		
2016-17	168	47	121	104	-
2017-18	205	209	-4		
2018-19	233	33	200	95	
2019-20	440	94	346		
2020-21	108	26	82	69	
	1357	408	949		606.25
Total					
Average	135.70	40.80	94.90	457.00	60.63