

Philip Drane
Planning Policy Team Leader
Brentwood Borough Council
Town Hall
Ingrave Road
Brentwood
Essex
CM15 8AY

05 September 2014

BY POST/EMAIL

Dear Mr Drane,

STRATEGIC HOUSING MARKET ASSESSMENT

We are writing on behalf of EA Strategic Land (EASL) to highlight a number of material considerations regarding the Brentwood Borough Council (BBC) draft Strategic Housing Market Assessment (SHMA).

The draft SHMA was published in June 2014 and we understand that it is the intention of each of the constituent authorities within the Heart of Essex (HoE) Housing Market Area (HMA) (including yourselves) to use its findings to inform your plan-making functions as a part of the evidence base.

The purpose of this letter is to draw your attention to our concerns with the SHMA, and the potential issues that may arise in its use in the plan-making process. This letter is provided in addition to the response form we provided in relation to the SHMA event, provided to Christopher Downes on 29th July 2014.

In summary, the NPPF and NPPG identify the following principal matters in relation to housing:

- The need to prepare plans that meet objectively assessed needs, with sufficient flexibility to adapt to rapid change;
- Make every effort to identify objectively assessed needs and then meet them in full;
- Local plans should be based on adequate, up-to-date and relevant evidence;
- In the context of the above, the SHMA should provide the necessary evidence base to facilitate the above. Furthermore it is explicitly required to identify housing need which meets household and population projections, taking account of migration and demographic change;
- The identification of need should quantify the total number of homes needed based on quantitative assessments that is based on facts and unbiased evidence;
- Plan makers should not apply constraints to the overall assessment of need; and

- Use household projections published by the Department for Communities and Local Government as the starting point estimate of overall housing need.

A failure to accord with the above matters would mean it could be argued that the draft SHMA does not accord with the requirements of the NPPF and the consequential weight attributed to the evidence base as a whole must be limited.

In view of the above, it is important to draw out the weaknesses of using the SHMA as a key evidence base document for the calculation of your borough's housing supply requirements.

Having undertaken a detailed review of the draft SHMA, and those of the other constituent authorities within HoE, we are unable to conclude that the draft SHMA complies with the requirements of the NPPF or NPPG. It is cast in the mould of a pre-NPPF SHMA, placing its focus on affordable housing needs. In order to function effectively as a SHMA, and accord with the requirements of the NPPF and NPPG should identify the OAN for housing in the relevant HMA, or HMAs, having, inter alia:

- Identified the HMA, or HMAs, with appropriate and compelling evidence provided to clarify rationale;
- Identified the sources of information for determination of OAN and confirmation of any potential weaknesses or shortcomings in its application in the HMA, or HMAs;
- Apply relevant considerations to the OAN to determine needs associated with specialist groups (as identified at Paragraph 50 of the NPPF);
- Make adjustments to account for socio-economic trends and aspirations (both within, and beyond, the HMA);
- Consider the relationship between the HMA and its neighbouring HMAs, to determine the need to accommodate overspill;
- Consider the effect of the plans and policies in place, or being prepared, in surrounding areas that influence the HMA and the HoE as a whole (including, for example, London and the TGSE area);
- Identify a range of potential scenarios for housing need with clear evidence as to why the scenarios have been identified; and
- Undertake rigorous sensitivity testing to determine the most relevant, robust and justified OAN figure;

In this case, the draft SHMA fails to identify the objectively assessed needs of BBC and furthermore it:

- The SHMA considers BBC to be a single market area without providing any robust justification for this assumption. Therefore BBC is under increased pressure to make provision for the full objectively assessed needs in order to be compliant with the NPPF;
- It has utilised the short term 'interim' 2011 household projections data which only consider projected growth for the 10-year period to 2021 and are subject to recessionary factors that have been assessed to have suppressed the household formulation rates;
- The 2011 household projections should be approached with caution based on the sensitivities outlined above, however we understand that the 2013 CLG household projections are scheduled to be produced this October, which will provide the most up-to-date figures upon which to base the plan; and

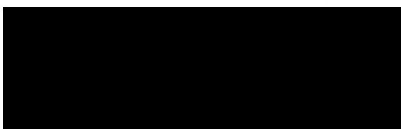
- It fails to give adequate consideration to the potential effects of housing requirements arising out of either the in-migration resulting from forecast economic growth, the ability of the London authorities to accommodate theirs and the effect of growth arising from neighbouring HMAs.

The identified position of BBC within the consortium and its relationship with neighbouring authorities is outlined at 3.11.6 within the SHMA. In order to ensure the duty to co-operate is capable of being found legally compliant we consider it is prudent for the Council to publish full details of the work it has undertaken to-date in order to discharge these duties.

We note comments made by DCA in the presentation that is 'not possible for the LPAs to address the under-delivery in the first 5 years of the Plan'. Were these comments made in the context of an NPPF compliant SHMA we would have also felt it necessary to express our concern that the author of the SHMA had adopted such a defeatist attitude from the outset. However, on the understanding that these concerns were cast in the context of affordable housing delivery they can be justified on the basis that the evidence base itself fails to set the necessary parameters to facilitate the delivery of sufficient affordable housing to meet needs.

We would welcome the opportunity to discuss these matters in further detail at your convenience.

Yours sincerely,



David Churchill
DIRECTOR