

CLARIFICATION QUESTIONS ON MATTER A – BCC

STRATEGIC HOUSING MARKET ASSESSMENT

1. Have the Council prepared a Strategic Housing Market Assessment in accordance with the policy at paragraph 159 of the NPPF and the guidance at sections 2a-014-20140306 to 2a-029-20140306 of the *Planning Practice Guidance* [PPG]?
2. Please explain how each requirement of that policy and guidance has been met in the evidence submitted to the examination.

OBJECTIVELY-ASSESSED HOUSING NEED

3. Do the Council consider that it is a legal requirement to prepare a full objective assessment of housing needs in the housing market area, before deciding whether or not the Plan should provide for less than the objectively-assessed needs? [See the judgment in *Gallagher Homes Ltd & Lioncourt Homes Ltd v Solihull MBC* [2014] EWHC 1283 (Admin).]
4. Do the Council still place any reliance on the range of 81,500 to 105,200, derived from the SHMA 2012 (revised January 2013) (doc.H2), as representing the objective assessment of overall household growth in the city over the Plan period? If so, should those figures be adjusted by adding 3% to give the overall housing need?
5. Is the Council's position now that the range from 89,000 to 115,900 set out in the *Objectively assessed housing need Update note* (September 2014) by Peter Brett Associates (Appendix to the Council's Matter A hearing statement) now represents the most accurate and up-to-date objective assessment of overall housing need in the city over the Plan period?
6. Is it the case that the PBA assessment which produced this range did not take into account employment trends and/or market signals, as recommended in the PPG, Ref ID 2a-018 to 20-20140306? If so, should those factors have been taken into account, and what effect are they likely to have had?

THE GBSLEP HOUSING NEEDS STUDY

7. Please explain more fully how the HRRs used in the PBA Trends models - described in paragraph 2.12, first bullet point, of the *Objectively assessed housing need Update note* (September 2014) - were derived. A table showing the annual average HRRs actually used in the models may be of assistance in clarifying this point.

8. When will the report on stage 1 and 2 of the GBSLEP Housing Needs Study be published (para 1.1 of the PBA *Update note* refers)?
9. Has stage 3 of the Study been commissioned and if so, when will the report on it be published?

THE HOUSING REQUIREMENT

10. If the Inspector considers it necessary to set a precise housing requirement figure in the Plan rather than a range, what should that figure be, and why?

THE HOUSING TRAJECTORY

11. Please explain the relationship between the housing trajectory in policy TP28 and "Table 2 – Supply Period" on page 5 of the Council's 2013 *Strategic Housing Land Availability Assessment* [SHLAA – H11].
12. Does the housing trajectory in policy TP28 need to be adjusted to take account of the Council's 2014 SHLAA [EXAM6]?

AFFORDABLE HOUSING

13. Would the Council like to comment on the points made by the Home Builders Federation in response to the Inspector's questions 7 and 8, in the HBF's Matter A statement?