

From: Piper, Jane jane.piper@stantec.com
Subject: FW: Officers' Meadow - Housing mix
Date: 26 July 2024 at 11:32
To: Jane Piper jane.piper1@gmail.com



Kind regards
Jane

Jane Piper

Planning Director

Mobile: 07887 526404
Tel: +44 118 952 0242
[Jane.piper@stantec.com](mailto:jane.piper@stantec.com)



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From: Piper, Jane
Sent: Tuesday, April 16, 2024 1:12 PM
To: Federica Ambrosini <federica@kewplanning.co.uk>; Kathryn Williams <Kathryn@kewplanning.co.uk>; Shanshan Li <Shanshan@kewplanning.co.uk>; emma.goodings@brentwood.rochford.gov.uk; Ben Yallop <Ben.Yallop@croudace.co.uk>
Subject: Officers' Meadow - Housing mix

Hi Federica

As you know we have responded on the issue of housing mix a number of times, but we feel we should address the issue about the information that the Housing Department is apparently gathering versus the SHMA evidence sent to us.

The Local Plan was drafted on the basis, amongst other things, of the South Essex Housing Needs Assessment (June 2022) and the SHMA Part 1 (October 2018) and SHMA Part 2, Objectively Assessed Need for Affordable Housing (June 2016). Therefore the needs for Policy R03 and the other allocated strategic sites come from this evidence.

Paragraph 6.24 of the adopted Local Plan that "*The Council's SHMA Part 2 provides a detailed assessment of **the housing required to meet existing and future needs across the borough.***" This has informed not just Policy HP05 on Affordable Housing but Policy HP04 Specialist Accommodation and other policies.

Adopted Policy HP05 2c states, "*In considering the suitability of affordable housing, the Council will require that **the type, mix, size and cost of affordable homes will meet the identified housing need as reported by the Council's most up-to-date housing evidence.***" Supporting text at paragraph 6.31 states,

"The provision of affordable housing to meet identified need is an important objective of the Local Plan. **To assess this need, the Council, commissioned consultants to produce a Strategic Housing Market Assessment (SHMA) Part 2**, which was published in June 2016, and uses the national planning practice guidance to calculate the level of affordable housing need." It is the SHMA that evidenced the need for 35% affordable housing and the tenure split set out in the local plan.

The local plan viability assessment was also based on this evidence.

Kew Planning sent the updated 2022 SHMA in May 2023 so Croudace could prepare the detailed application, in an attempt to minimise the delay of delivering house on their site to help the Council meet its published local plan housing delivery trajectory.

The Masterplan Development Principles document, approved in August 2023, was also based on the 2022 SHMA mix.

Further, the Planning Obligation SPD adopted as recently as December 2023 also relies on the SHMA, stating in the justification of the provision of on-site affordable housing, "*To address the need for affordable housing in the Brough in accordance to Policy HP05 and evidenced in the Council's SHMA*".

Given this obvious reliance on the SHMA throughout the local plan process and subsequent documents, and the fact Croudace were issued the update in May 2023, it is more than reasonable for Croudace to take **the most up-to-date, consistent, substantiated and tested evidence at the point of submission**. Conversely, it is unreasonable two months prior to the targeted committee to be expected to deal with an inconsistent, unsubstantiated and untested figures from the Housing Department, that have yet to be sent.

As you know, given the concern about a positive local decision, Croudace has taken a view to be as policy compliant as possible, even though the original numbers of dwellings on the site can no longer be achieved, in case the application has to be appealed. The Local Plan, the viability assessment, the approved Masterplan Principles document and the recently adopted Planning Obligation SPD **ALL** specify the SHMA as the credible evidence base. The application is currently in accordance with ALL of these policy documents.

Notwithstanding this, Croudace has been reasonable and tried to meet the Housing Department's (unspecified) needs at this incredibly late stage, and more importantly the requirements of the delivery agents, the RPs.

On this basis, Croudace will be formally amending the housing mix to that offered in our email of 20 March, so the total 1B apartments is 27% and the combined no of flats is 39% to align with the comments received from RPs.

Affordable			
Bedrooms	Number	%	Combined %
1B apartment	33	27%	39 %
2B apartment	14	12%	
2B house	59	48%	
3B house	13	11%	
4B house	2	2%	
Total	121	100%	

The plans and SOA are currently being amended and will be submitted along with our response to Place Services comments, but we thought you should know the Croudace position prior to our meeting on Friday and in advance of your (and hopefully our) meeting with Emma Goodings.

We can discuss the tenure split/First Homes as part of the s106 discussions. As I've written before, Croudace is getting to the top end of its financial tolerance (and in deed the figures assumed in the local plan viability assessment) so all of these things will need to be considered in the round when we know the full expectations.

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