Finalising the Gloucestershire Strategic Housing Market Assessment

Management Summary

13 February 2009

Gloucestershire Strategic Housing Market Assessment Partnership

CONTENTS

CONTENTS2				
1	Introduction	3		
	The Gloucestershire's SHMA process	3		
	Core SHMA outputs and the assessment of robustness	4		
	The requirements of PPS3	5		
	Report structure	5		
2	Review of the Fordham Research draft report	6		
3	The Housing Needs and Demand Technical Report	8		
	The brief	8		
	The approach	8		
	Comparing the calculation of housing needs	8		
	Main conclusion	11		
4	Updating the Assessment	12		
5	Audit	13		
	Strategic Housing Market Assessment core outputs	13		
	Strategic Housing Market Assessment Process Checklist	13		
	Strategic Housing Market Assessment Process Checklist	13		

1 Introduction

1.1 The Gloucestershire Strategic Housing Market Assessment (SHMA) is made up of several components which together provide the evidence base to inform the development of housing and housing related planning policies in the County. The last of these components is the Technical Report 'Estimating Housing Need and Demand in Gloucestershire' which was produced by Peter Smith Research and Consulting in January 2009. This Management Summary explains why this final piece of work was carried out and how it fits together with the earlier completed elements of the SHMA. It then sets out how all key SHMA requirements have been met.

The Gloucestershire's SHMA process

- 1.2 The Gloucestershire Strategic Housing Market Assessment has its origins in the study titled 'Analysis of Sub-regional Housing Markets in the South West' (South West Housing Body/DTZ Pieda Consulting, July 2004). The study identified Gloucester-Cheltenham as a housing market area, noting that "Gloucester and Cheltenham urban area lie at the heart of this sub-regional housing market, which broadly embraces the whole of the county of Gloucestershire and its constituent districts, though parts of Stroud district is subject to the influence of the West of England market, parts of Cotswold district look to Swindon, Oxford or north to Stratford upon Avon. On the north boundary of the market there is overlap with the Worcester sub-regional housing market" (p. 14, SWHB/DTZ 2004).
- 1.3 Based on the findings of this study the six Gloucestershire Authorities together with Gloucestershire County Council formed a housing market partnership for the purpose of preparing a strategic Housing market assessment. A Steering Group was set up to direct the process.
- 1.4 An initial scoping exercise was carried out by Gloucestershire County Council in November 2006 in which secondary data on the housing market and related demographic and economic aspects was compiled. This preliminary work provided a baseline knowledge position which informed subsequent steps in the assessment.
- 1.5 A wider steering group was established consisting of the Housebuilders Federation, the South West Regional Assembly; the South West RDA, GOSW (invited but didn't attend), Gloucestershire Rural Community Council and the Commission for the Protection for Rural England.
- 1.6 Fordham Research was contracted to undertake the SHMA in 2007. This consultant produced a draft report in June 2008 which incorporated the findings of the previously completed work, integrating these with new research using secondary data sources.
- 1.7 Consultation with the wider housing market partnership took place at an event organised on Wednesday 19th September 2007. Three meetings were held, each with a different range of stakeholders:
 - Meeting 1: Senior Officers and Members
 - Meeting 2: Professional Stakeholders including social housing providers and housing developers
 - Meeting 3: Community interest groups
- 1.8 Upon completion of Fordham Research's draft report in June 2008 the Steering Group engaged ECOTEC Research and Consulting as 'critical friend' to review it. This resulted in a report titled 'Review of Gloucestershire and Districts Strategic Housing Market Assessment'

- (ECOTEC, July 2008) which identified a number of gaps in the Fordham Research draft report.
- 1.9 The Steering Group approached several consultants to carry out additional work to fill these gaps, Peter Smith Research and Consulting was contracted to do this additional work in November 2008. This resulted in the Technical Report 'Estimating Housing Need and Demand in Gloucestershire' which was signed off by the Steering Group in early February 2009.
- 1.10 This management summary report is the last in the suite of reports that together make up the Gloucestershire Strategic Housing market Assessment.

Core SHMA outputs and the assessment of robustness

- 1.11 In August 2007 Communities and Local Government Department issued the latest version of the Strategic Housing Market Assessments Practice Guidance, which is referred to further in this report as 'the Practice Guidance'. Adherence to this Practice Guidance is an essential requirement for compliance with Planning Policy Statement 3 (PPS3).
- 1.12 Concerning robustness the Practice Guidance states that "...in line with PPS12, for the purposes of the independent examination into the soundness of a Development Plan Document, a strategic housing market assessment should be considered robust and credible if, as a minimum, it provides all of the core outputs and meets the requirements of all of the process criteria in figures 1.1 and 1.2. In such circumstances, there is no need for the approach used to be considered at the independent examination" (p. 9, CLG 2007).
- 1.13 Figure 1.1 of the Practice Guidance lists the following 8 SHMA core outputs:
 - Core output 1: Estimates of current dwellings in terms of size, type, condition, tenure.
 - Core output 2: Analysis of past and current housing market trends, including balance between supply and demand in different housing sectors and price/affordability.
 Description of key drivers underpinning the housing market.
 - Core output 3: Estimate of total future number of households, broken down by age and type where possible.
 - Core output 4: Estimate of current number of households in housing need.
 - Core output 5: Estimate of future households that will require affordable housing.
 - Core output 6: Estimate of future households requiring market housing.
 - Core output 7: Estimate of the size of affordable housing required.
 - Core output 8: Estimate of household groups who have particular housing requirements, e.g. families, older people, key workers, black and minority ethnic groups, disabled people, young people, etc.
- 1.14 Figure 1.2 of the Practice Guidance lists the following 7 items making up the SHMA process checklist:
 - Item 1: Approach to identifying housing market area(s) is consistent with other approaches to identifying housing market areas in the region.
 - Item 2: Housing market conditions are assessed within the context of the housing market area.
 - Item 3:Involves key stakeholders, including house builders
 - Item 4: Contains a full technical explanation of the methods employed, with any limitations noted.

- Item 5: Assumptions, judgements and findings are fully justified and presented in an open and transparent manner.
- Item 6: Uses and reports upon effective quality control
- Item 7: Explains how the assessment findings have been monitored and updated (where appropriate) since it was originally undertaken.

The requirements of PPS3

- 1.15 Strategic Housing Market Assessments are a crucial aspect of the evidence base in terms of preparing regional spatial strategies, local development documents, regional housing strategies and local housing strategies. It is however stated in PPS3 that strategic housing market assessments are only one of several factors that should be taken into account when determining housing provision figures or the right mix of housing.
- 1.16 The Gloucestershire SHMA Steering Group considers it vital that the County-wide SHMA provides clear evidence to inform the requirements set out in paragraph 22 of PPS 3, which is worded as follows. "Based upon the findings of the Strategic Housing Market Assessment and other local evidence, Local Planning Authorities should set out in Local Development Documents:
 - The likely overall proportions of households that require market or affordable housing, for example, x% market housing and y% affordable housing.
 - The likely profile of household types requiring market housing eg multi-person, including families and children (x%), single persons (y%), couples (z%).
 - The size and type of affordable housing required."
- 1.17 Similarly the Steering Group requires the SHMA to provide evidence that can be used to address PPS3 paragraph 29, which concerns the following:
 - Setting an overall (i.e. plan-wide) target for the amount of affordable housing to be provided;
 - Setting separate targets for social-rented and intermediate affordable housing where appropriate;
 - Specifying the size and type of affordable housing that is likely to be needed in particular locations and, where appropriate, on specific sites;
 - Setting out the range of circumstances in which affordable housing will be required.
- 1.18 There is clearly a degree of overlap between the core outputs listed in the Practice Guidance and the requirements of PPS3 paragraphs 22 and 29. The need to meet these requirements was a key reason for commissioning additional research to finalise the Gloucestershire SHMA.

Report structure

1.19 Section 2 of this report looks at the gaps that were identified by ECOTEC in their review of the draft SHMA report produced by Fordham Research. Section 3 describes the approach taken to the additional technical work on Housing Needs and Demand, describing the outputs produced and how they fit along side the previous work. The final Section details how all SHMA requirements have been met.

2 Review of the Fordham Research draft report

- 2.1 In June 2008 Fordham Research presented a draft report to the Steering Group titled 'Gloucestershire and Districts Strategic Housing Market Assessment'. The 325 page report was made up of 15 chapters organised under 5 main sections:
 - Section A: Introduction;
 - Section B: Context, which included chapters on the national and regional policy context, input from stakeholder consultations, the sub-regional housing market area, demographic and economic data, the housing stock and lastly the active housing market;
 - Section C: The Future Housing Market, projections for households and employment;
 - Section D: Housing Needs Analysis, which included an estimate of housing need and explored the housing requirements of specific household groups;
 - Section E: Bringing the Evidence Together, comprising 2 chapters 'current policies and trends in housing' and 'major themes, drivers and challenges';
 - Section F: Policy Implications and Updating, including chapters on housing market gaps and the housing ladder, policy tools for size mix and price, and a final chapter covering monitoring and updating.
- 2.2 As indicated by the section titles above, the Fordham report covered the full spectrum of SHMA topics, providing a great deal of the evidence required. However Fordham Research raised concerns about the quality of some of the primary data to support the Housing Market Assessment, in particular the Gloucestershire County-wide Housing Needs Survey carried out in 2004. Fordham Research pointed to limitations of the financial assessments of Survey respondents, and how this impacted on the ability to robustly predict figures for various tenure groups and property mix, as sought by PPS3.
- 2.3 The Steering Group commissioned ECOTEC Research and Consulting to carry out a 'critical friend' review in order to get a second opinion about the concerns raised. This resulted in the report 'Review of Gloucestershire and Districts Strategic Housing Market Assessment' (ECOTEC, July 2008) which assessed the Fordham Research draft report against the requirements of the Strategic Housing Market Assessments Practice Guidance (CLG, August 2007) as well as those of PPS3 paragraph 22.
- 2.4 The ECOTEC Review contained the following main conclusions:
 - Core Outputs 1, 2, 4, 5, and 8 of the Practice Guidance had been met, although some shortcomings and weaknesses were identified;
 - Core Outputs 3, 6 and 7 had not been met and these shortcomings would need to be addressed for the SHMA to be deemed robust. Specifically, these outputs concern:
 - Output 3: Estimate of total future number of households, broken down by age and type where possible;
 - Output 6: estimate of future households requiring market housing;
 - Output 7: an estimate of the size of affordable housing required.
 - 6 of the 7 requirements of the Process Checklist set out in table 1.2 of the Practice Guidance had been provided; the missing item concerned the failure to report on effective quality control mechanisms.
 - ECOTEC shared the Steering Group's concerns that the draft report did not effectively deliver an evidence base to inform the requirements of PPS3 paragraph 22, nor did it provide a clear picture of intermediate sector need.

- 2.5 Fordham Research proposed carrying out of a full primary survey of households in the 6 Gloucestershire district councils in order to address the limitations of the 2004 Housing Needs Survey.
- 2.6 The Steering Group was, at that time, unable to commission new primary research, leaving the SHMA carried out by Fordham Research incomplete.
- 2.7 Between August 2008 and January 2009 improvements were made to the Fordham SHMA report, addressing a number of the issues identified in the ECOTEC Review. This included reporting on effective quality control mechanisms (item 6 on the process checklist).

3 The Housing Needs and Demand Technical Report

The brief

- 3.1 Following consideration of the options available to ensure a compliant Strategic Housing Market Assessment, the Steering Group decided to engage a new suitably experienced consultant to carry out additional work to fill the gaps that had been identified in the ECOTEC Review. This piece of work would complete the Gloucestershire SHMA by building on the existing SHMA components and ensuring that the SHMA as a whole was fully compliant with the Practice Guidance.
- 3.2 The brief required core outputs 3, 6 and 7 of the Practice Guidance to be provided. In addition the new work was required to provide Local Planning Authorities with the necessary information to a) meet the requirements of Paragraph 22 and 29 (PPS 3) for developing LDF policy and b) enable ongoing planning negotiations to take place with the support of a robust and compliant indication of housing needs, tenure split and unit mix across the affordable and market sector.
- 3.3 Several consultants were approached to do the work and the contract was awarded to Peter Smith Research and Consulting in November 2008. The consultant produced a Technical Report in January 2009 titled 'Estimating Housing Need and Demand in Gloucestershire'.

The approach

- 3.4 In order to generate the required outputs concerning affordable housing (core output 7, the third bullet point of PPS 3 paragraph 22 and the requirements of PPS3 paragraph 29), the approach taken was to re-calculate housing need, applying a different methodology to the followed by Fordham Research. In particular, households in need were broken down by household type and a more sophisticated method was used to determine aspects of affordability. Need by household type was then converted into requirements for dwellings of different types, sizes and tenures (intermediate and social rent). These results were then compared to the available affordable housing supply, also differentiated by type, size and tenure, to identify shortfalls and surpluses.
- 3.5 The method also contained a new analysis of household projections data, delivering SHMA core output 3 as well as those outputs concerned with open market housing (output 6 and the first 2 bullet points of PPS 3 paragraph 22).

Comparing the calculation of housing needs

- 3.6 Both the Technical Report produced by Peter Smith Research and Consulting and chapter 9 of the SHMA report produced by Fordham Research are concerned with the calculation of housing need. However different estimates were arrived at due to the substantially different methodological approaches that were taken.
- 3.7 Both studies generated an estimate of current housing need that was based primarily on local authority housing register data. However the approach taken in the Technical Report was to screen individual records in the full datasets provided by each local authority. In addition eligible households interested in shared-ownership products as recorded by the Zone Agent were added to housing register candidates. Fordham Research on the other hand used the number of households considered to be in a "reasonable preference category" as given in the Housing Statistical Appendix Return (HSSA 2007/08) as the basis for their calculation. There was no investigation as to whether the numbers given in the HSSA Returns were underpinned by a consistent application of criteria by each local authority.

- 3.8 Both consultants applied an affordability test to candidates considered to be in housing need, but again there were significant differences to the approaches taken. Fordham Research assumed that the income distribution of those on the housing register would be the same as that of the population at large, resulting in 36% of candidates being considered able to afford open market housing. Peter Smith Research and Consulting investigated the income distribution of households on the Housing Register in three local authorities for which data was available. This resulted in a significantly lower estimate of those able to afford open market housing between 6 and 7% across Gloucestershire as a whole. In addition, actual income information was available for those candidates on the Zone Agent's list, allowing those able to afford market housing to be directly removed from consideration.
- 3.9 These divergent approaches led to significantly different estimates of current housing need 5,178 in chapter 9 of the Fordham Report compared to 9,666 in the Technical Report. The latter figure is considered to be more robust because it was arrived at following a bespoke analysis of raw data and because a more sophisticated approach to measuring affordability was taken.
- 3.10 Both consultants based their estimate of the number of newly forming households unable to afford open market housing each year on household formation rates given in the latest available CLG sub-regional household projections. Despite this, different approaches were adopted, although both were compliant with the methods set out in Annex B of the Practice Guidance. A key difference was in the age range chosen for the analysis of newly forming households. Fordham Research counted those in the age range 15 to 54 which resulted in an annual estimate of 4,696 newly forming households in Gloucestershire. Peter Smith Research and Consulting adopted a much narrower banding: 15-35 years in the case of multi-person households and 25-35 years in the case of single person households. This resulted in an annual estimate of 3,478 newly forming households in the County as a whole.
- 3.11 As with current need, the two studies took divergent approaches to determining the proportion of newly forming households able to afford open market housing. Fordham Research modeled this on income averages generated in Steve Wilcox' research for the Joseph Rowntree Foundation in combination with data from the Annual Survey of Hours and Earning (ASHE) and CACI PayCheck. This resulted in an estimated 49.5% of households passing the affordability test. The approach set out in the Technical Report analysed Survey of English Housing raw data to estimate the household income distribution specific to each household type and to each age band. This resulted in an estimated 54% of newly forming households being able to afford open market housing, with the share varying for each household type.
- 3.12 Fordham Research estimated that 2,372 newly forming households per annum would require affordable accommodation in Gloucestershire, compared to 1,599 in the Technical Report. The latter figure is considered to be preferable due to the approach taken to gauging affordability which identified levels of affordability for each household type.
- 3.13 The second component of newly arising need concerns existing households falling into need. The two studies diverge significantly in the approach to estimating this annual flow. Peter Smith Research and Consulting estimated this flow to be 285 per annum on the basis of Core data showing the number households accessing social rented and intermediate affordable housing from private sector tenures. The Technical Report states that this is to be considered a minimum level estimate as not all existing households falling into need will have been successful in securing affordable accommodation. Fordham Research arrived at a figure of 1,661 households by analysing the annual change in the number of households on Gloucestershire housing registers in recent years and making a deduction for those estimated to be newly forming households, which was done with reference to Core data on social sector lettings. This estimate is possibly too high given that there was no analysis of the previous tenure of households joining the housing register. The truth is therefore likely to

lie somewhere between the two estimates and the lower estimate has been adopted out of caution.

- 3.14 Both studies excluded households in need already occupying affordable dwellings from the estimate of current need and correspondingly excluded this number from the supply side of the calculation as well. The two studies are also alike in returning zero for surplus stock and units to be taken out of management.
- 3.15 There is a difference in interpretation concerning committed supply of new affordable units. Peter Smith Research and Consulting took a narrow interpretation, considering only those units currently under construction or in all reasonableness certain of being built at the time of the assessment. Bespoke information was produced by each local authority in accordance with this definition, resulting in a figure of 354 being entered into the calculation. Fordham Research gave a broader interpretation to supply element, taking it to mean affordable units 'which are committed to be built over the period of the assessment'. HSSA data showing the number of planned and proposed affordable units for the period 2007-2009 was used as a guide to new provision resulting in 1,743 being entered into the calculation.
- 3.16 The lower figure arrived at through a narrow interpretation of the Practice Guidance is considered preferable for the reasons set out in the Technical Report. Firstly, future new build levels are notoriously hard to predict and there is a significant risk of overestimating production volumes when these estimates are based on 'plans on the table'. Secondly, the narrow definition is consistent with a 'policy-off' scenario, which makes the results of the calculation easier to interpret.
- 3.17 Both consultants estimated annual re-let supply using Core data, although different estimates were arrived at (Fordham Research: 2,204; Peter Smith Research and Consulting: 1,215). The primary reason for this difference is that Fordham Research included first lettings of newly built affordable housing. The Technical Report excluded this element for the same reason that a narrow interpretation of committed supply was taken the inclusion of new build lettings would in effect constitute a 'policy-on' scenario, making the results of the calculation more difficult to interpret.
- 3.18 The last supply-side component concerns the annual level of affordable intermediate sector dwellings available for re-let or resale. Both consultants adopted broadly the same methodology for calculating this flow, in essence estimating the current size of the intermediate sector and then applying the re-let rate from the social rented sector as a proxy due to the lack of bespoke data covering intermediate sector re-lets and re-sales. There were however differences in the execution which led to different final figures (Fordham Research: 107 p.a., Peter Smith Research and Consulting: 96 p.a.). Peter Smith Research and Consulting made use of more up to date stock figures (RSR 2008) and projecting the recent growth in the number of shared ownership dwellings forward, estimating a greater number of intermediate sector dwellings in the future. A second difference was that Fordham Research used a higher re-let percentage (6.3% instead of 3.7%) which stems from the difference covered in the preceding paragraph.
- 3.19 Completing the housing needs calculation using the elements outlined above resulted in the following 'bottom line' figures for annual net (unmet) housing need:

• Fordham Research: 2,409

Peter Smith Research and Consulting: 2,435

3.20 The difference between these figures is less than 2%, however it should be remembered that the second estimate represents a 'policy-off' scenario with respect to the supply-side of the calculation. If future new builds (committed supply and new build lettings) had been entered into the calculation in the same way as that done by Fordham Research then the second

- estimate would have been halved to approximately 1,200. Furthermore aggregation at the County level masks significant differences to the figures generated for each local authority.
- 3.21 Crucially, the approach taken by the Technical Report produced outputs concerning the size and type of affordable housing required as well as a tenure split (social rent intermediate) to satisfy the requirements of Practice Guidance core output 7 as well as those required by PPS3 paragraphs 22 and 29. These were the outputs missing from the Fordham Research study.

Main conclusion

3.22 It has not been possible, given the different methodologies used and time frame for data gathering, to combine the two reports into a single volume 'Strategic Housing Market Assessment'. Therefore the Technical Report produced by Peter Smith Research and Consulting supersedes Chapter 9 of the Gloucestershire and Districts Strategic Housing Market Assessment' report produced by Fordham Research in its entirety

4 Updating the Assessment

- 4.1 Updating those elements of the SHMA completed by Fordham Research is detailed in Chapter 15 of its report 'Gloucestershire and Districts Strategic Housing Market Assessment' (this is referred to as 'Volume 2' by Fordham Research, as Volume 1 refers to the Executive Summary Report which they produced).
- 4.2 The housing needs calculation contained in the Housing Needs and Demand Technical Report should be updated annually using the (MS Excel) spreadsheets provided by consultant Peter Smith. The following input will need to be fed into the spreadsheets:
 - House price thresholds for market entry and the intermediate sector; these can be
 done using index figures taken from the Rent Service (private rented sector) and
 Homes and Communities Agency (average social rents); alternatively a new survey of
 lettings agents' housing offer could be carried out.
 - Household income data: a new CACI area report for Gloucestershire needs to be ordered each year as soon as figures for 2009 become available.
 - Social re-lets and intermediate sector re-sales: Core data, which is available on-line at <u>www.core.ac.uk</u>; individual data records (only available to those with log-in permission) need to be analysed to generate the detailed cross-tabulations required by the model.
 - Household projections data: CLG 2006-based sub-regional household projections are expected to become available in 2009; the dataset for Gloucestershire will need to be analysed using the same steps taken in the Technical Report, to generate new estimates for newly arising households.
 - Committed supply and units to be taken out of management: this requires a
 questionnaire to be circulated and filled in by local authority housing/planning officers.
 - Housing Register and Zone Agent data: this data is crucial for measuring current housing need; it is recommended that a project group be set up across all 6 local authorities to promote consistency and data quality; this will result in greater efficiency and improved accuracy when the next SHMA update is carried out.
 - Survey of English Housing: this study provided vital parameters to the assessment of
 housing need. It is not essentially that these parameters are updated every year, but it
 is suggested that at some point new analysis should be carried out on a later version
 of the survey when the data becomes available. In April 2008 the Survey of English
 Housing (SEH) merged with the English House Condition Survey (EHCS) to form the
 new English Housing Survey (EHS). Inquiries will need to be made to determine if
 and when record level data from this survey will become available.
- 4.3 It is recommended that the Steering Group consider updating the SHMA in the 3rd quarter of 2009.

5 Audit

5.1 Because the Gloucestershire SHMA comprises several elements the following two tables are presented to show how the core outputs and process checklist requirements of the Practice Guidance have been met.

Strategic Housing Market Assessment core outputs

5.2 Figure 1.1 of the Practice Guidance lists 8 core outputs that SHMAs are required to produce. These are set out in the following table. The column on the right describes where these outputs have been provided among the suite of Gloucestershire SHMA documents.

Core output		Provided
1	Estimates of current dwellings in terms of size, type, condition, tenure.	Fordham Research Volume 2, chapter 6.
2	Analysis of past and current housing market trends, including balance between supply and demand in different housing sectors and price/affordability. Description of key drivers underpinning the housing market.	Fordham Research Volume 2, chapters 5, 7, 11 and 12.
3	Estimate of total future number of households, broken down by age and type where possible.	Peter Smith Research and Consulting section 4.
4	Estimate of current number of households in housing need.	Peter Smith Research and Consulting section 3.
5	Estimate of future households that will require affordable housing.	Peter Smith Research and Consulting section 4.
6	Estimate of future households requiring market housing.	Peter Smith Research and Consulting section 6.
7	Estimate of the size of affordable housing required.	Peter Smith Research and Consulting section 6.
8	Estimate of household groups who have particular housing requirements, e.g. families, older people, key workers, black and minority ethnic groups, disabled people, young people, etc.	Fordham Research Volume 2, chapter 10.

Strategic Housing Market Assessment Process Checklist

5.3 The next table sets out how the Practice Guidance process checklist items have been met.

Process Checklist		Provided
1	Approach to identifying housing market area(s) is consistent with other approaches to identifying housing market areas in the region.	Fordham Research Volume 1, S.7 and S.8; this refers to the preliminary work done by DTZ Pieda in 2004 to define sub-regional housing market areas across the South West Region.
2	Housing market conditions are assessed within the context of the housing market area.	In March 2007 the CLG issued an Advice Note which emphasised the need to take a pragmatic approach that groups local authority administrative areas together as an approximation for functional sub- regional housing markets. In keeping with this most of the secondary data has been analysed at the local authority level. Where national datasets have been used (such as the Survey of English Housing) the relevance of this data to the local situation has been investigated using parallel datasets and through data triangulation.
3	Involves key stakeholders, including house builders	Several consultation events were held during the process; Fordham Research chapter 3 and appendix 1 sets out some of the detailed information provided by consultation.
4	Contains a full technical explanation of the methods employed, with any limitations noted.	This has been done throughout the assessment; the technical paper on Housing Need and demand sets out fully the approach taken, and limitations are acknowledged

		openly. All data sources used are fully referenced.
5	Assumptions, judgements and findings are fully justified and presented in an open and transparent manner.	Again, this is done throughout the assessment; the technical paper sets out in a transparent manner where estimates have been used and explains the rationale behind them.
6	Uses and reports upon effective quality control mechanisms.	Fordham Research Volume 2 chapter 1 (see 1.13); the ECOTEC 'critical friend' Review of the Fordham Research draft report was a further element of quality control carried out during the SHMA process.
7	Explains how the assessment findings have been monitored and updated (where appropriate) since it was originally undertaken.	Monitoring and updating is yet to take place; however arrangements are in place and this aspect is covered Fordham Research Volume 2 chapter 15as section 4 of this management summary document.

...