

**Appeal by Catesby Estates Ltd**

**Land East Buckingham, Stratford Road, Maids Moreton**

**PROOF OF EVIDENCE OF**

**JONATHAN LEE**

**ON BEHALF OF**

**AYLESBURY VALE DISTRICT COUNCIL**

**PINs Ref: APP/J0405/W/17/3175193**

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# 1. Introduction and Summary

- 1.1 My name is Jonathan Lee and I am Managing Director of Opinion Research Services (ORS), an independent social research practice that was founded at the University of Wales Swansea and has specialised in social and housing research for more than 20 years. I have a BSc degree in Computer Science (with Honours) awarded by the University of Wales (Swansea) in 1996.
- 1.2 I first joined ORS in 1994 and have been responsible for Strategic Housing Market Assessments undertaken for more than 100 local authorities across England and Wales, all of which require advanced knowledge of statistics and demographic modelling. I have also worked on numerous Housing Needs Assessments, Housing Requirement Studies, Stock Condition Surveys and Health Impact Assessments.
- 1.3 I am instructed by Aylesbury Vale District Council to give evidence in relation to this Appeal. My evidence in this case deals specifically with “Buckinghamshire Housing and Economic Development Needs Assessment Update 2016” (CD F.2; “the HEDNA Update”) and the associated “Buckinghamshire HEDNA Addendum (September 2017)” (CD F.3; “the HEDNA Addendum”) prepared by ORS and Atkins.
- 1.4 ORS and Atkins were jointly commissioned by Aylesbury Vale District Council (with Chiltern District Council and Wycombe District Council) to prepare a Housing and Development Needs Assessment (HEDNA) which was published as a Consultation Draft in October 2015 (“the Original HEDNA”) to support the Council in objectively assessing and evidencing development needs for housing (both market and affordable) and provide evidence to inform local policies, plans and decision making. The Original HEDNA was based on a Housing Market Area (HMA) for Buckinghamshire that ORS identified as part of a study jointly commissioned by the four Buckinghamshire local planning authorities to identify Housing Market Areas in Buckinghamshire and surrounding areas (“the HMA study”).
- 1.5 The HEDNA Update was subsequently prepared to take account of the consultation feedback received, to extend the geographic coverage of the study to include the South Bucks District Council area (in order to provide a consistent evidence base for the Chiltern and South Bucks joint Local Plan) and to take account of the most up-to-date information available. The HEDNA Addendum was prepared to respond to additional feedback. The HEDNA Update together with the associated HEDNA Addendum entirely supersede the Original HEDNA.

- 1.6 I was the Project Director for the Original HEDNA, the HMA study, the HEDNA Update and the HEDNA Addendum. I took responsibility for the analysis and modelling on all of these studies and was the lead author of their reports. All of the studies fully comply with the National Planning Policy Framework (CD E.1; “NPPF”) and the approach used is well-established and consistent with Planning Practice Guidance on the Assessment of housing and economic development needs (CD E.2, ID 2a; “PPG”) and the good practice advice published by the Planning Advisory Service (PAS) *“Objectively Assessed Need and Housing Targets: Technical Advice Note, second edition”* (July 2015; CD G.40).
- 1.7 It is relevant to note that the Appellant has not submitted any alternative assessment of housing need in advance of proofs being finalised and exchanged. This contrasts with the approach normally taken by Appellants who are relying on alternative assessments of housing need in the context of 5-year housing land supply. In my experience, the relevant Council would normally be advised that such work is being undertaken well in advance and specific dates would normally be included on the inquiry timetable in order to ensure that all evidence is available to both parties well in advance of proofs being prepared.<sup>1</sup> Given that the Appellant in this inquiry has not submitted any alternative assessment before proofs were finalised, it will unfortunately be necessary to respond to this evidence through a rebuttal proof.
- 1.8 The evidence which I have prepared and provide for this appeal reference APP/J0405/W/17/3175193 (in this proof of evidence) is true and I confirm that the opinions expressed are my true and professional opinions. A list of acronyms is included for reference at Appendix 1. Planning and site assessment details relating to the Appeal are considered by other witnesses.

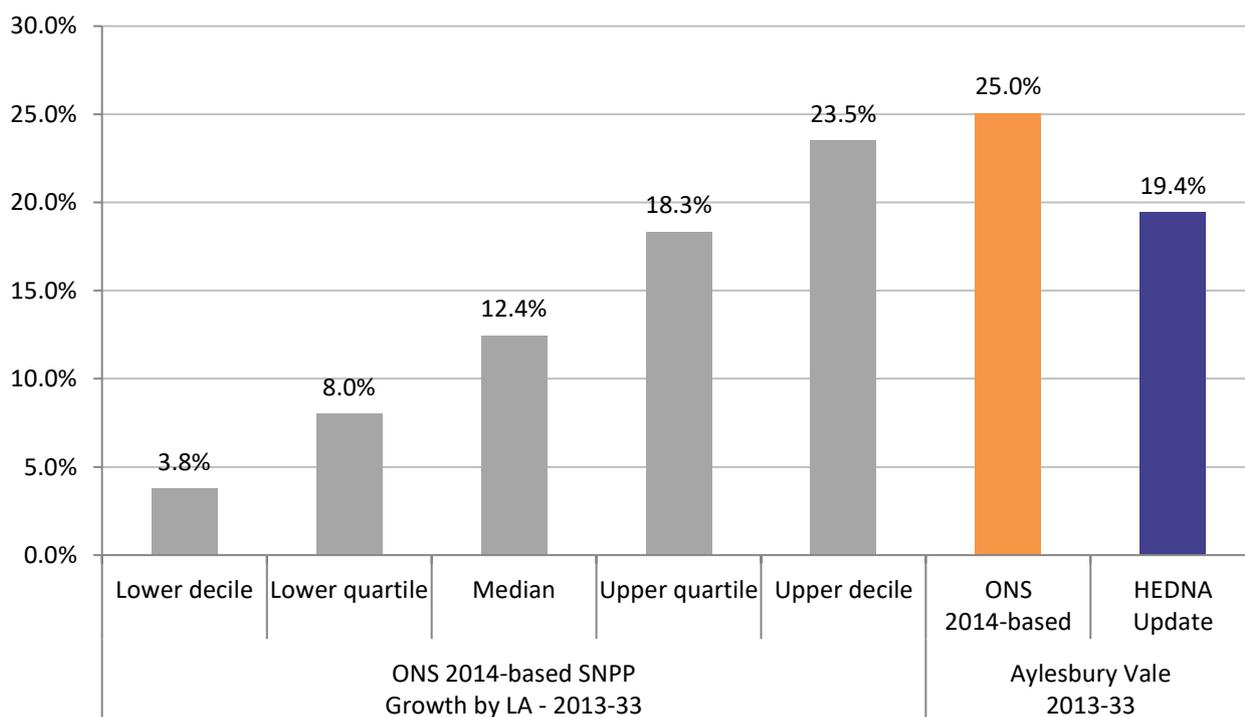
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<sup>1</sup> For example: for a recent appeal in Aylesbury Vale, evidence on OAN was exchanged on 21 February 2017, 4 weeks in advance of the submission of proofs of evidence on 21 March.

## Summary of Evidence

### Establishing the Objectively Assessed Need

- 1.9 The HEDNA Update sets out the Council’s full assessment of housing needs, based on the Buckinghamshire housing market area over the 20-year period 2013-2033. For the purposes of 5-year housing land supply, the OAN should be assessed for Aylesbury Vale district.
- 1.10 The HEDNA Update takes full account of all of the relevant evidence that affects local demography issues for Aylesbury Vale and provides realistic demographic projections, based on the most reliable data and set in the context of long-term migration trends. The population projections identify that population growth will be 19.4% over the 20-year period 2013-33.
- 1.11 The following chart considers the population projections for Aylesbury Vale in context.



- 1.12 The HEDNA Update (which takes account of local data quality issues and is based on long-term trends) projects that population growth will be 19.4% over the 20-year period 2013-33. This projection remains within the upper quartile, so is higher than more than three quarters of all local authority areas in England; but it identifies a level of growth that is realistic when compared to the exceptionally high 5-year trend. The ORS migration rates, based on reliable long-term trends, provide the most robust basis for projecting population on which to base the OAN.

- 1.13 In aligning jobs and workers, the HEDNA Update has been based on employment forecasts prepared by Oxford Economics which identify a jobs-growth of 40,700 jobs for Buckinghamshire HMA over the 20-year period 2013-2033. This represents a compound growth rate of 0.78% per year, and since 1997 there have been no periods of 10-years or more where Buckinghamshire has sustained a higher rate of growth. In terms of assumptions taken relating to the future labour force, the HEDNA Update is fully consistent with the Oxford Economics forecast in terms of economic activity rates, unemployment rates, commuting rates and double jobbing.
- 1.14 Where additional housing is provided to balance future jobs and workers, it is reasonable to conclude that this will “*increase planned supply by an amount that ... could be expected to improve affordability*” (PPG ID 2a-020) in the same way as providing additional housing for any other reason. There is no reason to conclude that providing extra housing given a need for additional workers would have an impact that is any different to providing extra housing to enable more households to form; so this uplift should also be considered as a cumulative part of the response to market signals.
- 1.15 The Council’s OAN of 969 dpa represents an overall increase in dwellings of 26% over the 20-year Plan period, an average of 1.3% per year.

## Inspector Decisions from Previous Appeals in Aylesbury Vale

- 1.16 The HEDNA Update was tested at a previous appeal in April 2017 (“Land off Chilton Road, Long Crendon”; Appeal Ref: APP/J0405/W/16/3142524). The appeal was dismissed and the Inspector endorsed the FOAN identified in the HEDNA (CD H.5, paras 15-25).
- 1.17 On the main issues of disagreement relating to OAN, the Inspector confirmed:

**Data Quality:** “*I am satisfied on the basis of the evidence that I heard that in the 2011 census the ONS Mid Year Estimates (MYE) were overestimates*” (para 19)

**Migration rates:** “*I am satisfied that for the purposes of this appeal the use of long term trends for calculating migration levels is an acceptable approach*” (para 18)

**Market signals:** “*I am satisfied in this case that the use of a 10% uplift is reasonable*” (para 20).

- 1.18 On this basis, the Inspector concluded (para 25):

*Therefore, in conclusion on the basis of the evidence that I have read and heard I consider that the FOAN promoted by the Council whilst untested is based on reasonable and plausible assumptions.*

- 1.19 The Inspector also confirmed that unmet need from other parts of the HMA should not form part of the five year housing land supply requirement until it has been tested and found sound at examination (paras 22-23).
- 1.20 Prior to this appeal, the HEDNA Update was also tested at an inquiry in February 2017 (“Land west of Castlemilk, Moreton Road, Buckingham MK18 1YA”; Appeal Ref: APP/J0405/V/16/3151297). Whilst ORS was not represented at the Inquiry, the Inspector dismissed the OAN identified by the applicants (1,377 dpa) and accepted the HEDNA figures as the basis for assessing 5-year housing land supply (CD H.3, Inspector’s Report, para 143):

*Overall, therefore, I am not convinced that it has been shown that the FOAN is anything like as high as that calculated by the applicants. The AVDC calculations, as set out in the 2016 HEDNA, have not been tested at an EiP and were not defended at the Inquiry. While this means that their robustness has not been shown, this does not mean that they are either unreliable or unreasonable.*

- 1.21 The Inspector’s approach at this appeal was endorsed by the Secretary of State, who concluded that the HEDNA Update represented the most up to date assessment of housing need and provided a reasonable basis on which to calculate the 5-year housing land supply (CD H.3, Decision Letter, para 24):

*For the reasons given at IR129-143, **the Secretary of State agrees** with the Inspector that the housing requirement set out in the October 2016 Buckinghamshire Housing and Economic Needs Assessment Update (HEDNA) represents the most up to date assessment of housing need, **which is a reasonable basis on which to calculate the 5 year HLS** for the purposes of these proposals.*

- 1.22 The conclusions reached by both previous Inspectors and the Secretary of State have a substantial bearing on this Inquiry. The Buckinghamshire HEDNA is based on the same methodology as the approach recently endorsed by Local Plan Inspectors in both Luton (August 2017; CD H.26) and Stevenage (October 2017; CD H.27). Therefore, their conclusions also have a substantial bearing on this Inquiry.

## Government consultation on the “Standard Methodology”

- 1.23 The Government published a consultation for a new standard methodology on 14 September 2017; however, the consultation does not supersede the current approach and the proposed approach may well change in the light of consultation feedback. Furthermore, the consultation document explicitly sets out proposed transitional arrangements that would apply once any new approach has been finalised. Thus in no sense should it be thought that the approach set out in the consultation document is one that should be adopted for the purposes of this Appeal.

- 1.24 Both I and the Council have significant concerns about the proposed standard methodology, given that it seeks to provide the “*silver bullet*” that LPEG warned could not be achieved. In my view, the approach fails to take account of LPEG concerns (CD G.41, para 26) that the official projections “*can be vulnerable to statistical anomalies*” and in “*relying just on the ‘unvarnished’ projections*” it has led to “*inaccurate estimates of need*”. Furthermore, it is evident that the “*standardised upwards adjustment for market signals*” that has been proposed is unfair “*for areas that have performed well in delivering housing*”. Instead of providing “*clear guidance*” for “*relevant local adjustments*”, the proposed methodology being consulted upon “*is a distinctly “top down” approach which risks losing the advantage of acceptance that locally calculated needs should bring*”.
- 1.25 The Housing White Paper recognised that there would be some areas where there are reasonable justifications for deviating from the standard methodology. Evidence of problems associated with the ONS population estimates (such as the problems identified for Aylesbury Vale by the HEDNA) would have to be considered in this context. On this basis, even if the standard methodology was adopted in April 2018 without any changes to the proposed method, on behalf of the Council I would recommend that it challenge the figure for Aylesbury Vale, and would justify why the number could not be relied upon in this administrative area. The consultation does not change the evidence base for OAN at this inquiry.

## Sense Check of Overall Housing Need

- 1.26 The Council’s OAN of 969 dpa represents an overall increase in dwellings of 26% over the 20-year Plan period, an average of 1.3% per year.
- 1.27 Achieving a growth of 1.0% nationally would require a 71% increase in current housebuilding rates<sup>2</sup> and would meet Government objectives to delivery one million new homes. The Council’s OAN identifies that the need for housing in Aylesbury Vale is 30% higher than the national average, and as such it represents an ambitious and proportionate target for the area.
- 1.28 Any contribution to meeting unmet needs from elsewhere in the housing market area is likely to need a housing target based on the Council’s OAN that will require housebuilding rates in the area to be almost double the national average and amongst the highest of all local authority areas in England.
- 1.29 **It is evidently clear that the HEDNA provides the only robust and reliable assessment of Objectively Assessed Housing Need for Aylesbury Vale at 969 dpa.**

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<sup>2</sup> HEDNA Update, paras 7.15-17

## 2. The Council's Approach

- 2.1 The Council accepts that Aylesbury Vale does not have a housing requirement figure in an up-to-date adopted Local Plan; however, the “*Buckinghamshire Housing and Economic Development Needs Assessment Update 2016*” (CD F.2; “the HEDNA Update”) and the associated “*Buckinghamshire HEDNA Addendum (September 2017)*” (CD F.3; “the HEDNA Addendum”) prepared by ORS and Atkins sets out the latest full assessment of housing needs, based on the Buckinghamshire housing market area.
- 2.2 PPG clearly states that “*the latest full assessment of housing needs*” (ID 3-030) should be considered by the Inspector as the basis for 5-year housing land supply. The Secretary of State confirmed on 19 July 2017 that the “*Buckinghamshire Housing and Economic Needs Assessment Update (HEDNA) represents the most up to date assessment of housing need*” (CD H.3, Decision Letter para 24) for Aylesbury Vale.

### Inspector Decisions from Previous Appeals in Aylesbury Vale

- 2.3 The HEDNA Update was tested at an inquiry in February 2017 (“Land west of Castlemilk, Moreton Road, Buckingham MK18 1YA”; Appeal Ref: APP/J0405/V/16/3151297). Whilst ORS was not represented at the Inquiry, the Inspector dismissed the FOAN identified by the applicants (1,377 dpa) and accepted the HEDNA figures as the basis for assessing 5-year housing land supply (CD H.3, Inspector’s Report, para 143):

*Overall, therefore, I am not convinced that it has been shown that the FOAN is anything like as high as that calculated by the applicants. The AVDC calculations, as set out in the 2016 HEDNA, have not been tested at an EiP and were not defended at the Inquiry. While this means that their robustness has not been shown, this does not mean that they are either unreliable or unreasonable.*

- 2.4 The Inspector’s approach at this appeal was subsequently endorsed by the Secretary of State, who concluded that the HEDNA Update represented the most up to date assessment of housing need on which to calculate the 5-year housing land supply (CD H.3, Decision Letter, para 24):

*For the reasons given at IR129-143, **the Secretary of State agrees** with the Inspector that the housing requirement set out in the October 2016 Buckinghamshire Housing and Economic Needs Assessment Update (HEDNA) represents the most up to date assessment of housing need, **which is a reasonable basis on which to calculate the 5 year HLS** for the purposes of these proposals.*

2.5 The HEDNA Update was subsequently tested at an appeal in April 2017 (“Land off Chilton Road, Long Crendon”; Appeal Ref: APP/J0405/W/16/3142524). I was called to give evidence at this Inquiry and two days of inquiry hearings were dedicated to evidence relating to OAN and the 5-year housing requirement. The appeal was dismissed and the Inspector clearly endorsed the FOAN identified in the HEDNA (CD H.5, paras 15-25).

2.6 The issues of disagreement relating to OAN were summarised at paragraph 16 of the Inspector’s Decision:

*The main reasons for the difference in opinion arises from issues surrounding data quality; migration rates and whether a 10% or 15% uplift should be applied to market signals.*

2.7 On these three points of difference, the Inspector confirmed:

**Data Quality:** *“I am satisfied on the basis of the evidence that I heard that in the 2011 census the ONS Mid Year Estimates (MYE) were overestimates ... Having accepted that the MYE do need to be recalculated I consider that for the purposes of this appeal that the use of patient data is a reasonable approach”* (para 19)

**Migration rates:** *“I am satisfied that for the purposes of this appeal the use of long term trends for calculating migration levels is an acceptable approach”* (para 18)

**Market signals:** *“I am satisfied in this case that the use of a 10% uplift is reasonable”* (para 20).

2.8 On this basis, the Inspector concluded (para 25):

*Therefore, in conclusion on the basis of the evidence that I have read and heard I consider that the FOAN promoted by the Council whilst untested is based on reasonable and plausible assumptions.*

2.9 Furthermore, the Inspector also confirmed that unmet need from other parts of the HMA should not form part of the five year housing land supply requirement until it has been tested and found sound at examination (paras 22-23):

*Following the close of the Inquiry the Council has recently signed a MoU with other authorities that form the HMA which increases the requirement to 8,000 additional dwellings ... Whilst I accept that the MoU is a clear statement of intent, the figures it contains have not been subject to any testing through the local plan process. Consequently, I agree with the Inspector for the Buckingham Road appeal that **to include a figure that has not been tested at examination or found sound within the five year housing land supply requirement would amount to the application of a ‘policy-on’ approach. I consider that this would be the wrong approach for a S78 appeal.** This approach is*

*consistent with that taken by other Inspectors considering the issue of housing land supply elsewhere in AVDC albeit that I recognise that these decisions predate the latest MoU.*

- 2.10 The conclusions reached by both previous Inspectors and the Secretary of State have a substantial bearing on this Inquiry.

## Local Plan Inspectors' Views of ORS' Methodology

- 2.11 The Council's evidence at this appeal is based on HEDNA that uses the same methodology for assessing overall housing need as has been recently tested through Examination in Public and endorsed by the Inspectors examining Local Plans for Luton (August 2017; CD H.26) and Stevenage (October 2017; CD H.27).
- 2.12 The **Luton Local Plan** Inspector's report considers the housing number at length (CD H.26, paras 76-109). His report endorses the OAN figure of 47,237 dwellings as being reasonable (para 92) and confirms that the SHMA apportionment of 17,800 for Luton borough (and therefore the balance of 29,500 for Central Bedfordshire) is also reasonable (para 96). Whilst he rightly notes that evidence from the new SHMA will need to be considered once it is available, he did not consider it necessary for the Plan to refer to "at least" 17,800 dwellings (para 109), although he did recommend an early review to take account of the latest information (para 107).
- 2.13 The **Stevenage Local Plan** Inspector's report considers the OAN and housing market area under Issue 1 (CD H.27, paras 16-37). Her report endorses the SHMA and the methodology used:

*I agree that there is strong evidence to support Stevenage and North Hertfordshire being considered to be a single market (para 19)*

*I agree that a 10 year trend migration scenario is the most appropriate in this case (para 29)*

*As such a 10% market signals adjustment is suggested as a response to help address market pressures and I agree that this is appropriate (para 34)*

*Establishing the future need for housing is not an exact science and this is acknowledged in the PPG. Reaching an OAN figure requires some reasoned judgments to be made. In my view the Council has followed the approach set out in the PPG and done this. As such I find that the OAN figure of 7,300 (365dpa) is justified. (para 37)*

- 2.14 The Buckinghamshire HEDNA is based on the same methodology as the approach endorsed by both Local Plan Inspectors, therefore the conclusions reached have a substantial bearing on this Inquiry.

## Government consultation on the “Standard Methodology”

2.15 The Housing White Paper confirmed that the Government intended to set out proposals for a “*standardised approach to assessing housing requirements*” and consultation for a new standard methodology was published on 14 September 2017.

2.16 The standard methodology responds to recommendations from the Local Plans Expert Group (LPEG) which concluded (CD G.41, para 15):

*The absence of a definitive guide for the production of SHMAs - and the estimate of OAN within them - is undoubtedly a problem*

2.17 However, it is important to recognise that LPEG dismissed the proposal “*that there can be a quick “silver bullet” to identify OAN, perhaps centrally by DCLG*” for a number of reasons (CD G.41, para 24):

- *telling local authorities what their OAN must be is a distinctly “top down” approach which risks losing the advantage of acceptance that locally calculated needs should bring;*
- *local circumstances do vary and arriving at a fair, standardised adjustment from CLG projections would be difficult. We were told, for instance, that the most recent set of official projections are/can be vulnerable to statistical anomalies for areas of distinct demography such as university towns, in locations where trends in migration were unduly influenced by the recession, and in areas of low demand. In other words, relying just on the ‘unvarnished’ projections could lead to inaccurate estimates of need. Many local authorities and those within the consultancy sector have access to the necessary demographic modelling tools, and have developed sufficient familiarity with local demographic factors to apply the required adjustments, so there are no barriers to plan makers accessing the necessary expertise to apply relevant local adjustments, where clear guidance is available;*
- *a standardised upwards adjustment for market signals may be considered unfair for areas that have performed well in delivering housing compared to others that have accumulated a significant backlog; and*
- *locally prepared SHMAs have other, important roles to play in justifying policies on the mix of dwellings, arriving at estimates of affordable housing need, and supporting discussions under the duty to cooperate, notably in terms of how patterns of demand might influence distribution of unmet need.*

- 2.18 All of these reasons are cogent and sensible as to why it is important for SHMAs to be locally prepared – but immediately after setting out this reasoning, LPEG went on to say that their preference was “to recommend adoption of a simplified, standard common methodology within the NPPG for the preparation of concise SHMAs with a clear stipulation that this is the approach government expects to be followed” (CD G.41, para 27).
- 2.19 The methodology proposed by LPEG created a “top down” framework for assessing housing need. It ignored that official projections “can be vulnerable to statistical anomalies” and explicitly set out “a standardised upwards adjustment for market signals”, despite LPEG being of the view that this may be considered unfair. Furthermore, the methodology that LPEG proposed was also relatively complex and introduced substantial double counting.
- 2.20 The “standard methodology” on which the Government is consulting is very simple. The calculation of housing need takes the ‘unvarnished’ household projections for the 10-year period 2016-2026 as an annual average, and then applies a standardised adjustment based on affordability. For areas with a Local Plan adopted in the last 5 years, the need figure is then constrained to being no more than 40% above the annualised housing number in the adopted Local Plan.
- 2.21 Whilst the Government has rightly decided not to adopt the complex methodology for assessing housing need that LPEG had proposed, the “standard methodology” being consulted upon fails to address the concerns that the group identified.

## Outcome of the “Standard Methodology” for Aylesbury Vale

- 2.22 The standardised methodology calculation for Aylesbury Vale can be summarised:
- » CLG 2014-based projections identify an increase from 75,782 to 86,491 households over the 10-year period 2016-2026: an annual average of 1,071 households;
  - » The affordability ratio of median workplace earnings to median house prices was 10.85 in 2016, and based on the proposed standard calculation the affordability uplift would be 42.8%; however, the affordability uplift is capped at a maximum of 40.0% and this is applied to the household projection;
  - » This yields a housing need of 1,499 dpa.
- 2.23 On this basis, the standardised methodology identifies a need for 14,990 dwellings over the 10-year period 2016-2026. The total dwelling stock in 2016 was 77,520 dwellings; therefore, the total number of homes in

Aylesbury Vale would have to increase by a fifth (19.3%) over the decade in order to meet the housing need identified by the standard methodology. It is important to note that this figure only represents the local need for Aylesbury Vale; it does not include any additional housing that may be required to meet unmet need from the rest of Buckinghamshire, Greater London or elsewhere. Any contribution to meeting unmet need would increase the figure yet further.

- 2.24 As a comparison, over the previous decade 2006-2016 the housing stock in Aylesbury Vale increased by 8,630 dwellings, which represented an increase of 12.5%. This compares to an increase of 7.5% for England; so the historic rate of growth in Aylesbury Vale was 67% higher than the national average. Indeed, Aylesbury Vale was amongst the 10% of local authority areas with the highest rates of housing delivery in the country.
- 2.25 To deliver 250,000 dwellings annually across England over the decade 2016-2026 would require the stock to increase by 10.5% nationally. This is considerably higher than the increase of 7.5% achieved over the previous decade, and would need housebuilding rates on average to increase by 40%. In contrast, the growth of 19.3% identified by the proposed standard methodology for Aylesbury Vale to meet its local need would suggest that housebuilding rates in this area need to increase by 54%; despite the rate of housing delivery achieved in the area over the previous decade already being amongst the highest in the country.
- 2.26 The rate of housebuilding nationally needs to increase; and given its location and characteristics, it is reasonable to expect Aylesbury Vale to deliver housing at a rate that is above the national average. Nevertheless, it is unrealistic to suggest that the rate of delivery in Aylesbury Vale needs to increase at rate that is 35% higher than the rate of increase needed nationally (54% cf. 40%) to meet its own local need. It is equally unrealistic to suggest that the overall rate of delivery over the decade in Aylesbury Vale needs to be almost double the national rate (19.3% cf. 10.5%) to meet its own local need.
- 2.27 The rate of growth identified by the proposed standard methodology for Aylesbury Vale (19.3%) is the third highest rate of growth identified for any local authority area in England outside London (only Uttlesford (20.9%) and Central Bedfordshire (22.1%) yield higher rates). This is partly due to its reliance on the *'unvarnished'* household projections, which the SHMA demonstrated to be unreliable because of the problems identified with the ONS Mid-Year Estimates.
- 2.28 The Housing White Paper recognised that there would be some areas where there are reasonable justifications for deviating from the standard methodology. Evidence of problems associated with the ONS population estimates (such as the problems identified for Aylesbury Vale by the HEDNA) would have to be

considered in this context. On this basis, even if the standard methodology was adopted in April 2018 without any changes to the proposed method, on behalf of the Council I would recommend that it challenge the figure for Aylesbury Vale, and would justify why the number could not be relied upon in this administrative area.

## Conclusions on the “Standard Methodology”

- <sup>2.29</sup> The Government published a consultation for a new standard methodology on 14 September 2017; however, the consultation does not supersede the current approach and the proposed approach may well change in the light of consultation feedback. Furthermore, the consultation document explicitly sets out proposed transitional arrangements that would apply once any new approach has been finalised. Thus in no sense should it be thought that the approach set out in the consultation document is one that should be adopted for the purposes of this Appeal.
- <sup>2.30</sup> Both I and the Council have significant concerns about the proposed standard methodology, given that it seeks to provide the “*silver bullet*” that LPEG warned could not be achieved.
- <sup>2.31</sup> In my view, the approach fails to take account of LPEG concerns (CD G.41, para 26) that the official projections “*can be vulnerable to statistical anomalies*” and in “*relying just on the ‘unvarnished’ projections*” it has led to “*inaccurate estimates of need*”. Furthermore, it is evident that the “*standardised upwards adjustment for market signals*” that has been proposed is unfair “*for areas that have performed well in delivering housing*”. Instead of providing “*clear guidance*” for “*relevant local adjustments*”, the proposed methodology being consulted upon “*is a distinctly ‘top down’ approach which risks losing the advantage of acceptance that locally calculated needs should bring*”.
- <sup>2.32</sup> The consultation does not change the evidence base for OAN at this inquiry.

## In Conclusion

- 2.33 The Council accepts that Aylesbury Vale does not have a housing requirement figure in an up-to-date adopted Local Plan, and in such circumstances PPG clearly states that *“the latest full assessment of housing needs”* (ID 3-030) should be considered by the Inspector as the basis for 5-year housing land supply.
- 2.34 The *“Buckinghamshire Housing and Economic Development Needs Assessment Update 2016”* (CD F.2; “the HEDNA Update”) and the associated *“Buckinghamshire HEDNA Addendum (September 2017)”* (CD F.3; “the HEDNA Addendum”) prepared by ORS and Atkins sets out the latest full assessment of housing needs, based on the Buckinghamshire housing market area.
- 2.35 The OAN identified by the HEDNA has been tested through previous inquiries and the OAN has been endorsed by those Inspectors. Furthermore, the Secretary of State confirmed on 19 July 2017 that the *“Buckinghamshire Housing and Economic Needs Assessment Update (HEDNA) represents the most up to date assessment of housing need”* (CD H.3, Decision Letter para 24) for Aylesbury Vale. The conclusions reached by both previous Inspectors and the Secretary of State have a substantial bearing on this Inquiry
- 2.36 The Buckinghamshire HEDNA is based on the same methodology as the approach recently endorsed by Local Plan Inspectors in both Luton (August 2017; CD H.26) and Stevenage (October 2017; CD H.27). Their conclusions also have a substantial bearing on this Inquiry.
- 2.37 Whilst the Government published a consultation for a new standard methodology for assessing housing needs, the consultation does not supersede the current approach and the proposed approach may well change in the light of consultation feedback. Both I and the Council have significant concerns about the proposed standard methodology, given that it seeks to provide the *“silver bullet”* that LPEG warned could not be achieved. The consultation does not change the evidence base for OAN at this inquiry.
- 2.38 **The basis for calculating the 5-year housing land supply should be the latest full assessment of housing needs for Aylesbury Vale. That is the Buckinghamshire HEDNA, which identifies an OAN of 969 dpa.**

## 3. Overview of the HEDNA

- 3.1 The HEDNA Update adopts the CLG 2014-based household projections as the starting point for establishing OAN, an average of 1,051 households per year over the 20-year period 2013-33. However, PPG recognises that “the household projections published by the Department for Communities and Local Government ... have not been tested” (ID 3-030); and that this starting point estimate of overall housing need may require adjustment to reflect factors affecting local demography (ID 2a-015, emphasis added).

*Household projections published by the Department for Communities and Local Government should provide the **starting point** estimate of overall housing need. The household projections are produced by applying projected household representative rates to the population projections published by the Office for National Statistics ... The household projection-based estimate of housing need **may require adjustment to reflect factors affecting local demography***

- 3.2 Chapter 3 of the HEDNA Update reviews the official population estimates in detail, and taking full account of all of this information, the HEDNA Update establishes alternative household projections for Aylesbury Vale in the context of local demography.

### Population Trends

- 3.3 The CLG household projections which provide the starting point estimate of overall housing need are based on the Office for National Statistics (ONS) Sub-National Population Projections (SNPP). This data in turn is based on data from the ONS Mid-Year Estimates (MYE). However, in Aylesbury Vale the MYE component of population change data suggested a net gain of 14,815 people over the 10-year period 2001-11, but the population of Aylesbury Vale did not actually increase by 14,815 people. In fact, Census data shows that the population increase was only 8,377 people over this period – a difference of 6,438 persons.
- 3.4 The ONS take account of this difference through an “accountancy” adjustment in the Mid-Year Estimate data; however, 6,438 “missing” persons cannot simply be ignored when projecting the future population – this is a critical factor affecting local demography. Given the fundamental importance of population trends, the HEDNA Update considered this issue in detail for Aylesbury Vale (pages 42-51).

- 3.5 Based on a balanced analysis of all of the evidence, the HEDNA Update concluded that the 2001 Census had probably overestimated the population at that time; and with the benefit of hindsight, more recent data suggests that the population was actually around 162,500 persons. On this basis, the HEDNA Update concludes that *“the 2001 Census probably overstated the population for Aylesbury Vale by around 3,400 persons”* (para 3.34); but this only explains around half of the 6,438 “missing” persons. Taking account of all of the evidence available, the HEDNA Update goes on to conclude that (para 3.35):

*“we are more than 99% confident that the component of population change data from the revised ONS mid-year estimates overestimates population growth for Aylesbury Vale”*

- 3.6 It is accepted that data recorded on births and deaths are broadly accurate, therefore either fewer people moved to Aylesbury Vale or more people moved away than the flow data suggests – so the remaining “missing” people must be associated with net migration (in its broadest sense).

- 3.7 In July 2013, the House of Commons Public Administration Select Committee (PASC) published a report on Migration Statistics (HC 523, July 2013) (CD G.42). This report concludes that *“Migration estimates based on the International Passenger Survey ... do not provide accurate estimates of international migration to and from local areas”* (page 4). Furthermore, the report cites views from other experts about the quality of this data (page 10):

*Despite these recent improvements migration statistics are still not fully adequate for the task of producing robust population estimates or understanding patterns of migration*  
(Royal Statistical Society)

*The statistics on migration to and from the UK and its constituent parts are inadequate*  
(British Society of Population Studies)

*The international migration data are not fit for purpose* (Royal Geographical Society)

- 3.8 Chapter 3 of the PASC report (pages 16-18) deals with local area migration estimates – i.e. estimates of international migration to and from local authority areas. The report quotes the Royal Statistical Society:

*There is a continued problem with the quality and quantity of migration data available at a local level. Improvements have been made through the Migration Statistics Improvement Programme by allocating international migrants to local authority areas using administrative data, but the local-level estimates of migration are not robust, particularly for areas with high population turnover. For some local authority areas the Census has shown that the ONS population estimates have*

*misrepresented the level of population growth, a problem caused by inaccurate internal and international migration estimates.*

3.9 Furthermore, the report notes that the UK Statistics Authority has concluded:

*The IPS sample size is too small to enable the production of reliable international migration estimates at a local authority level.*

3.10 The chapter concludes (emphasis added):

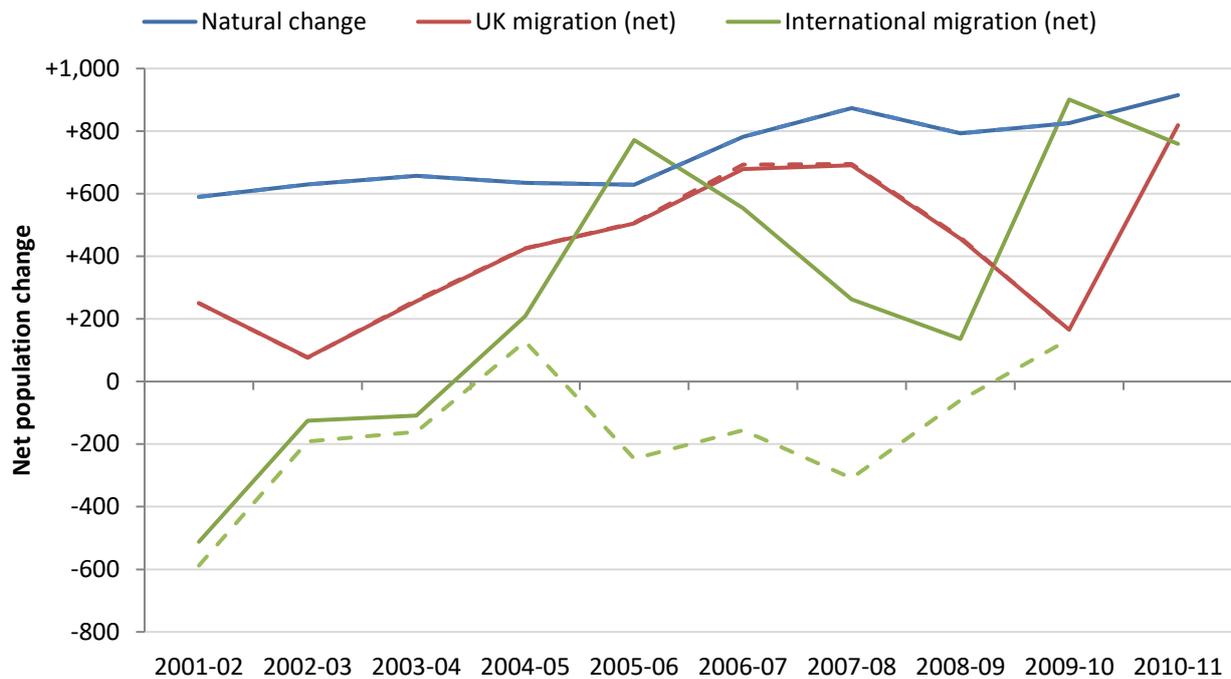
**The International Passenger Survey does not provide accurate estimates of international migration in local areas. The Census provides the most accurate data on the number and characteristics of migrants at the local level**, but it is too infrequent to act as a routine source of data. The future of the Census is also uncertain. As **the only reliable source of data on migrant populations in local areas**, the potential loss of the Census is a concern. Accurate estimates of migration in local authorities must be available independent of the Census. The ONS should develop new sources of data on international migration that are robust enough to provide accurate estimates of annual migration flows to and from local authority areas, even if the Census continues.

3.11 Migration is critically important to future population projections, and although the MYE component of population change data recorded overall net migration to be a gain of 7,170 persons over the 10-year period 2001-11, the HEDNA Update concluded that this overall gain associated with net migration was around 2,400 persons too high (para 3.36). Taking account of the evidence from all of the official statistics, the HEDNA Update concluded that net migration over the 10-year period 2001-11 actually averaged around 480 persons annually.

## Impact of the ONS Migration Statistics Improvement Programme

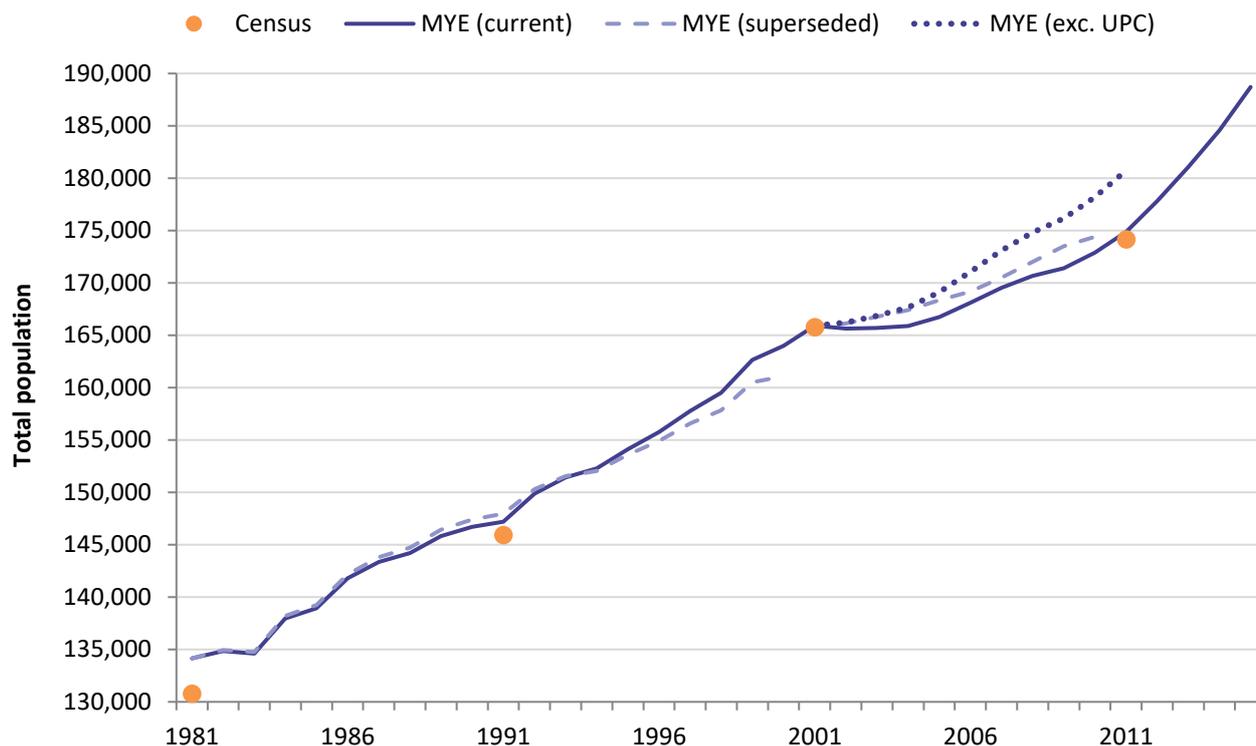
3.12 The individual components of population change are estimated by the ONS each year when deriving the MYE, however the original estimates for 2001-02 to 2009-10 were revised in the light of the ONS Migration Statistics Improvement Programme (MSIP).

3.13 The chart below shows the estimates for Aylesbury Vale. The dashed lines show the original ONS estimates and the solid lines show the MSIP revised estimates. It is evident that the estimates for natural change and UK migration did not change substantively, however international migration estimates changed marginally for the period 2001-04 and were fundamentally revised from 2005-06 onwards.



<sup>3.14</sup> The original estimates for international migration identified a net loss of around 1,400 persons over the period 2001-10 whereas the revised figures identified a gain of around 2,100 persons over the same period. This change led to an additional 3,500 persons being incorporated in the population estimate for mid-2010, which increased from 174,400 to 178,200 persons as illustrated in the chart below.

<sup>3.15</sup> It is evident that the original estimate (represented by the MYE (superseded) series on the chart) was much closer to the population estimate based on Census data. The MSIP revised estimate (represented by the MYE (exc. UPC) series on the chart) was actually less accurate as it suggested a far higher rate of population growth than was actually experienced. In other words, whilst the ONS Migration Statistics Improvement Programme improved the population estimates in most local authority areas, the estimates got far worse in Aylesbury Vale.



<sup>3.16</sup> The ONS has not changed its method for the population estimates since the 2011 Census, so any systematic problem with the method would continue to affect more recent estimates. On this basis, the HEDNA Update considered the net population change in the component of change data for 2011-12, 2012-13, 2013-14 and 2014-15 in the context of a range of administrative data (HEDNA, figure 23). All identified that the MYE was continuing to overstate population growth. This is in accordance with PPG ID 2a-017 which states:

***Can adjustments be made to household projection-based estimates of housing need?***

*The household projections produced by the Department for Communities and Local Government are statistically robust and are based on nationally consistent assumptions. However, plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates. Account should also be taken of the most recent demographic evidence including the latest Office for National Statistics population estimates.*

*Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence.*

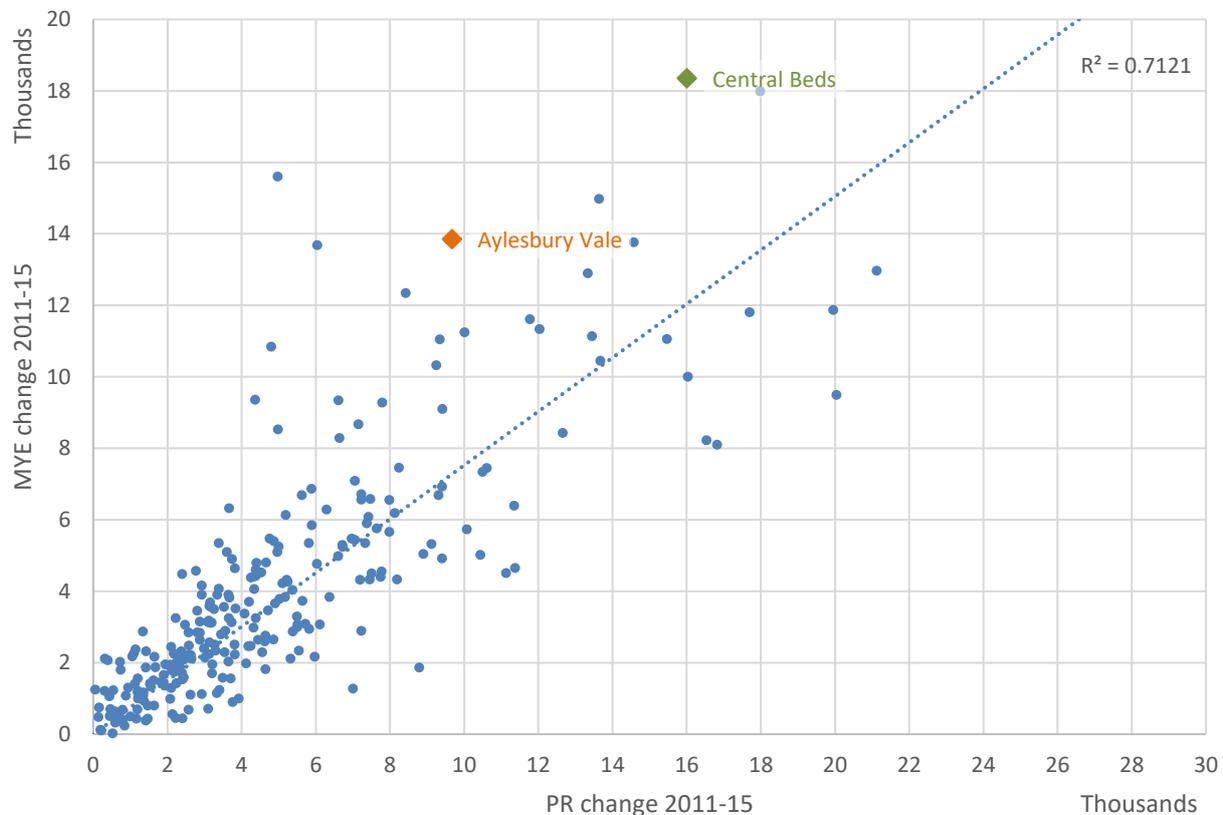
3.17 Alternative population data for Aylesbury Vale is carefully considered in the HEDNA and in summary, over the 4-year period 2011-15:

- » The mid-year estimates suggest a population increase of 13,850 persons, which is **4,170 higher** than the 9,680 increase recorded on the NHS patient register – a difference of 1,043 persons on average each year;
- » The mid-year estimates suggest an increase of 1,260 children aged 5-14, which is **520 higher** than the 740 increase on the school census; and
- » The mid-year estimates suggest an increase of 4,610 people aged 65 or over, which is **340 higher** than the 4,270 increase in people aged 65+ receiving state pension.

3.18 Alternative administrative data for population is useful because the figures for the patient register and school places are based on real data returns each year while the MYE is based upon a combination of data returns and a model which also incorporates trend patterns. If trend patterns for an area have been wrong in the past then there is a high probability that they will continue to be wrong in the future. All of the administrative data sources that ONS identified for validating the population estimates suggest that the population is increasing slower than suggested by the estimates for the period mid-2011 to mid-2015, especially for those younger age groups that are particularly impacted by migration. On this basis, the HEDNA Update concluded that (para 3.41):

*“the methodological improvement to estimating migration that the ONS introduced from 2004-05 onwards has created a systematic problem in Aylesbury Vale which has persisted beyond 2011, and it therefore isn’t appropriate to adopt this data uncritically”*

- 3.19 The following chart clearly shows that Aylesbury Vale is an outlier when compared to other areas when comparing Patient Register change and the change in Mid-Year Estimates for the period 2011-15.



- 3.20 The chart also identifies that Central Bedfordshire is an outlier too; and ORS have had to address similar problems when establishing the OAN for the Luton and Central Bedfordshire SHMA. The approach taken for the demographics underlying the OAN for that study has been considered by a number of Inspectors, and was recently endorsed at appeal (CD H.25, paras 26-29, emphasis added):

*26. The SHMA is a technical document intended to inform the formulation of the local plan strategy. Whilst it has not been through the process of examination, it was undertaken to establish the OAN for housing across the Luton and Central Bedfordshire Housing Market Area (HMA). I agree with my colleague in the earlier decision that this HMA is the most useful and appropriate option, particularly as neighbouring authorities were involved in a Steering Group that informed the SHMA process.*

*27. This appeal is not the forum to carry out a forensic analysis of the SHMA. I have noted the concerns of the appellant company that the reliance upon Census data for migration projections and a failure to properly account for market signals, in their view, would increase the dwellings per annum figure. **It was accepted that the Office of National Statistics do not consider Census data to be completely accurate. However, there are risk factors attributable to all data sources. The***

**Census, whilst infrequent, provides estimates of long-term migration patterns. As a document which informs local plan making, the SHMA must look to the long-term without the danger of being influenced by short-term trends.** Sensitivity testing may be an approach which should be considered but for the purposes of this appeal I am satisfied that the use of the Census data permeating through the substance and conclusions of the SHMA is appropriate. In reaching this view I am mindful that the difference between the mid-year estimates as the starting point and the Census data on the unadjusted housing need figures would likely be academic.

28. In considering market signals these should be assessed with reference to HMA. The SHMA approach is to draw comparisons with HMAs which exhibit similar demographic and economic characteristics. This does not necessarily mean neighbouring local authority areas. These may not be comparable with the extent and characteristics of the HMA. This is a judgement to be made and I am not convinced that the approach taken in the SHMA in this regard is unjustified.

29. Therefore, whilst I accept that some adjustments may be required to the OAN, as a result of the matters raised by the Examining Inspector, and in the formulation of a new local plan, this is a matter which requires further work, consideration, consultation and examination. I do not consider it is my role to set an OAN for the District. **In my view, to the extent that it has been considered at the Inquiry, the SHMA represents a robust source of base data to establish the housing requirement.** As a result the Council's OAN in all probability would not be less than 29,500 dwellings over the plan period. I have considered the five year housing land supply (5YHLS) on this basis.

<sup>3.21</sup> With regard to Aylesbury Vale, the administrative data clearly justifies the continued need for an adjustment to the MYE (as it did in Central Bedfordshire). Whilst the MYE data identifies a growth of 13,850 persons, the HEDNA Update concluded that adjustments to migration estimates consistent with those needed to reconcile the data for the period 2001-11 would reduce this to an increase of 9,646 persons (paras 3.43-44). This is comparable with the growth recorded on the patient register (9,680 persons) which is typically higher than the overall population growth.<sup>3</sup>

<sup>3.22</sup> It is important to recognise that there has been no change in the ONS methodology for establishing the MYE since the mid-2011 estimates were produced – so any systematic error that existed at that time will continue to impact on more recent estimates, and therefore cannot be ignored. Whilst the ONS will not have a robust basis for correcting this data until the results of the 2021 Census are available (and therefore

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<sup>3</sup> Over the period 2011-15 the patient register increased by 1.90 million persons nationally whereas the ONS population estimates identified an increase of 1.68 million persons over the same period

no official correction can yet be made), it is apparent that corrections made to the mid-2011 estimates need to be applied to the data for more recent years unless the underlying issues can be addressed through changes to the methodology.

- 3.23 This approach used in the HEDNA Update is consistent with the PPG, which states that alternative assumptions may be adopted provided that they are clearly explained, justified and based on robust evidence (ID 2a-017, emphasis added).

*Plan makers may consider sensitivity testing, specific to their local circumstances, based on **alternative assumptions in relation to the underlying demographic projections** and household formation rates. Account should also be taken of the most recent demographic evidence including the latest Office of National Statistics population estimates. Any local changes would need to be **clearly explained and justified on the basis of established sources of robust evidence**.*

- 3.24 Whilst the HEDNA Update did not separate out the impact of correcting for the underlying data quality issues from the reliance on long-term migration trends based on 10-year averages, I can confirm that adopting the adjusted population estimates from the HEDNA Update would yield an increase of 36,235 persons over the 20-year period 2013-33 based on 5-year migration trends for the period 2009-14 (the same period as used for the ONS 2014-based SNPP); compared to the increase of 45,272 persons projected by the 2014-based SNPP. **On this basis, simply taking account of the identified data quality issues reduces the housing need from the CLG starting point of 21,028 households (21,836 dwellings; 1,092 dpa) to an overall increase of 17,466 households (18,137 dwellings; 907 dpa).**

## Migration Rates

- 3.25 The HEDNA Update report considered the basis for establishing migration trends in detail (pages 64-67) and concluded that:
- » 5-year trend migration scenarios are less reliable: they have the potential to roll-forward short-term trends that are unduly high or low and therefore are unlikely to provide a robust basis for long-term planning.
  - » 10-year trend migration scenarios are more likely to capture both highs and lows and are not as dependent on trends that may be unlikely to be repeated. Therefore, we favour using 10-year migration trends as the basis for our analysis.

- 3.26 **The HEDNA Update therefore favours 10-year migration trends as the basis for establishing housing need**, rather than the 5-year trends used for the CLG projections. This is consistent with PAS advice (CD G.40; paras 6.22 and 6.24) and expert views (for example “*Making Sense of the New English Household Projections*”, Professor Ludi Simpson and Dr Neil McDonald; CD G.43, page 178). Adopting long-term migration trends also avoids the suppressing of migration from London. This approach was discussed with officers from the GLA at a meeting in January 2015 and was agreed to be appropriate.
- 3.27 ORS has systematically adopted long-term migration trends based on a 10-year average across all OAN assessments that we have undertaken since the publication of the NPPF (any assessments that previously used different assumptions have been updated to ensure consistency). In some assessments this has increased the starting point, in others it has reduced it. The use of long-term trends is appropriate in both instances. The approach is consistent with that used by ORS for the Bath and North East Somerset (BANES) SHMA, where the Inspector Mr Simon Emerson concluded the following in his Report of the Examination into the Council’s Core Strategy (June 2014; CD H.28) (paras 41-43, emphasis added):

*41. There are two main criticisms of the use of this figure. Firstly, ONS states that the other, unattributable, changes introduced each year (generally a reduction of about 450 and reflected in Fig 1 of Addendum 1a) should not be directly taken off estimates of net migration because, as its name indicates, the ONS are not sure of the reasons why the adjustments have to be made.*

**However, if this other changes adjustment is not made, the Census figures between 2001-2011 would not correlate and any annual average for past migration and other changes would not reflect what the Censuses show actually occurred.**

*42. Secondly, the most recent five years leading up to 2010-11 (in Fig 1 of Addendum 1a) has a higher annual average for migration and other changes at 681 than the 10 year average and this figure would be higher still if the ONS data for 2011/12 (published at the end of June 2013) was included in a rolled-forward five year average. However, **given the uncertainties inherent in some of the data, particularly for flows of migrants internationally, a 10 year period is a reasonable approach** and the latest MYE was published just as the ORS were completing their Addendums 1a and b so, understandably, had not been included.*

*43. The 10 year period selected by ORS also enables a simple cross-check drawn directly from the increase in the population of the district between 2001 and 2011 shown by the MYE for those years which are most closely related to the Censuses. In this period, the population increased by 6,338. (The rolled forward MYE from 2001 had indicated much higher growth at 12,308 – BNES/43 – and thus was clearly an overestimate.) Natural change (births and deaths) are a relatively reliable*

component of change and account for an increase of about 1,000 over the inter-censal period. The residual increase as a result of all types of out-migration and in-migration is about 5,500 or 550 per year. **The inter-censal period provides a readily understandable and robust check on the reasonableness of the average of about 550 per year for migration and other change used in the ORS model. Thus I consider that the ORS mid-trend population projection is a reasonable demographic projection.** The population increase between 2011-2031 is projected to be about 16,600.

3.28 The approach is also consistent with that used by ORS for the Cheshire East Housing Development Study, where the Inspector concluded the following in his Further Interim Views of the Examination into the Council's Local Plan Strategy (December 2015; CD H.29) (paras 23-24, emphasis added):

23. Turning firstly to demographic housing need, the base figure using the latest DCLG 2012-based household projections equates to just under 22,000 new dwellings (2010-2030). **Making adjustments to reflect a longer 10-year period on which to base future migration rates**, along with vacant/second homes (4%), that figure is increased to almost 27,000 new dwellings. CEC has not included any adjustment to reflect local household formation rates (HFRs), particularly for the younger age groups (which may have been depressed in previous years), or for previous lower rates of housing delivery, which may have been affected by previous policy constraints and influenced past migration. However, the latest 2012-based household projections incorporate some uplift in HFRs compared with the lower rates in the superseded 2011-based projections, and so there is no specific need for any further adjustment, especially since PAS guidance advises that this is the best information available at present.

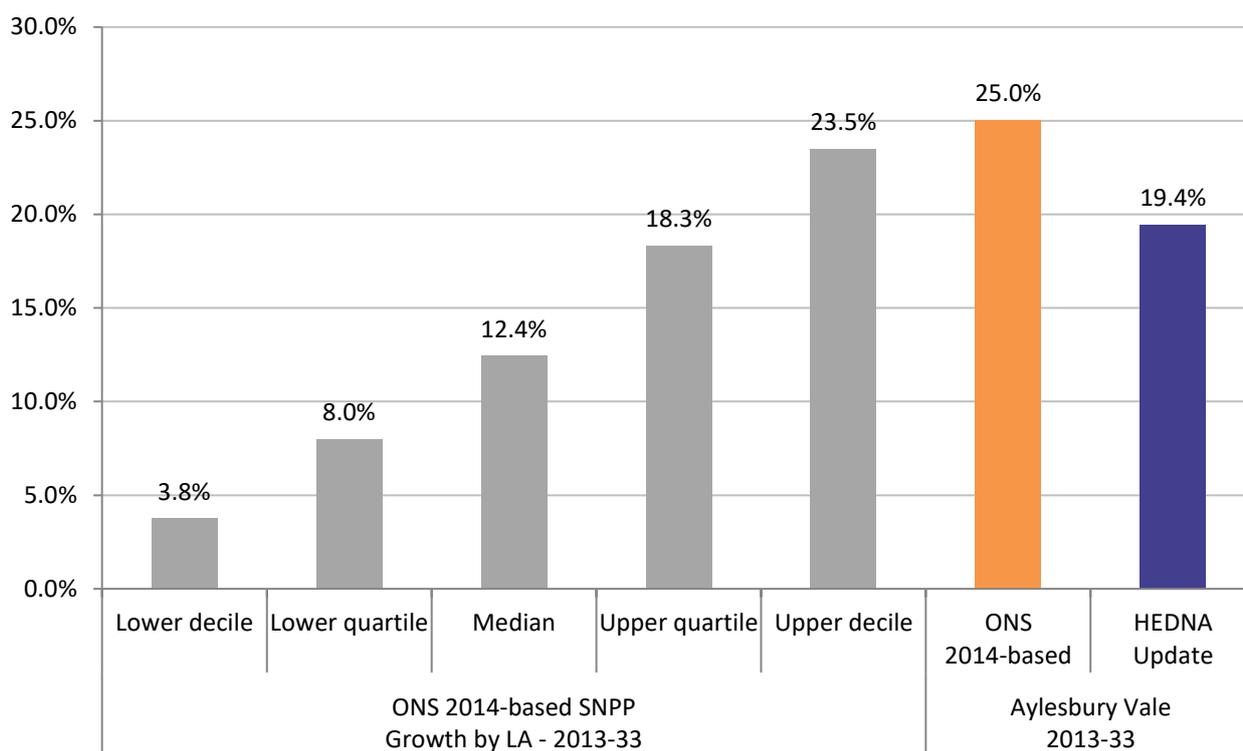
24. CEC's consultants considered a range of HFRs and migration assumptions, giving reasons for selecting the preferred option. Previous policy restrictions on housing provision only lasted for a limited time and did not cover the whole Plan area; and there is no shortfall in housing provision in the period before the current Plan, based on contemporary housing targets. **More recent migration and population figures may not provide a reliable guide for longer-term trends** and do not necessarily undermine CEC's estimates and assumptions. In any event, the uplift proposed between the base demographic need and the proposed OAN/housing requirement figure would more than account for any adjustment needed to reflect these demographic factors.

3.29 Consistent with the conclusions in the BANES SHMA and the Cheshire East HDS (as approved by both Inspectors), HEDNA Update recommended that population projections based on long-term migration trends were the most appropriate for establishing overall housing need. Not only did this allow calibration

against detailed Census data (instead of relying exclusively on inadequate migration estimates from the International Passenger Survey), it also avoided the assessment of overall housing need being informed by short-term trends that are either too low or too high.

## Population Projections

<sup>3.30</sup> The following chart considers the actual population projections for Aylesbury Vale in the context of all local authority areas.



<sup>3.31</sup> The ONS 2014-based sub-national population projections suggested that the population was likely to increase by 25.0% over the period 2013-33 based on 5-year migration trends. This was in the context of median growth across all local authority areas being 12.4% (half of local authorities had growth above this rate, half below this rate); the upper quartile being 18.3% (quarter of local authorities had growth above this rate) and the upper decile being 23.5% (only 10% of local authorities were projected to grow at or above this rate).

<sup>3.32</sup> The HEDNA Update (based on 10-year migration trends which take account of data quality issues that affect local demography) projects that population growth will be 19.4% over the 20-year period 2013-33. This remains within the upper quartile, so is higher than more than three quarters of all local authority areas in England; but it identifies a level of growth that is realistic when compared to the exceptionally high 5-year trend.

- 3.33 It is unrealistic to assume that the short-term migration trends on which the ONS projection is based would be sustained for the full 20-year Plan period as housing development in Aylesbury Vale has been extremely high in recent years whilst it has not yet increased to the levels required in other parts of the country, and it is clearly unreasonable to not take account of this.
- 3.34 It is notable that most other LAs with comparable levels of proportionate growth are London boroughs, and the Greater London Authority (GLA) has rightly argued that this does not provide a robust basis for planning for the long-term needs of London. The 2014-based SNPP included 21 London boroughs in the 32 local authorities projected to have the fastest rate of growth; but the GLA 2013-round projections reduced the projected growth for these areas by 30% (see Appendix 2). This approach was endorsed by the Inspector examining the Further Alterations to the London Plan in Autumn 2014 (CD H.30, paras 24-30):

*30. The GLA acknowledge that the projections are uncertain, particularly with respect to migration, and this is the main reason why a review of the Plan is planned to start in 2016. However, **it seems to me, having considered all the evidence and the submissions, that they are reasonable and probably the best available assessment of objectively assessed housing need for London at this time.***

- 3.35 For exactly the same reasons, the ONS starting point does not provide a robust basis for planning for the long-term needs of Aylesbury Vale. **The ORS migration rates, based on reliable long-term trends, provide the most robust basis for projecting population on which to base the OAN.**
- 3.36 Taking account of the identified data quality issues reduces the housing need from the CLG starting point of 21,028 households (21,836 dwellings; 1,092 dpa) to an increase of 17,466 households (18,137 dwellings; 907 dpa). Based on long-term migration trends using a 10-year average, the housing need further reduces to an increase of 16,933 households (17,584 dwellings; 879 dpa).<sup>4</sup>

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<sup>4</sup> HEDNA Update, figure 53 and figure 54

## Balancing Jobs and Workers

### Jobs Growth

- 3.37 The Original HEDNA considered two economic forecasts in relation to future employment, one based on data from Oxford Economics and the other based on data from Experian. These were reviewed against past trends and discussed with a wide range of stakeholders.
- 3.38 The 2015-based Oxford Economics data identified an increase of around 42,300 jobs across the Buckinghamshire Functional Economic Market Area (FEMA) whilst the Experian data identified a notably higher increase of around 51,300 extra jobs. These represented annual compound growth rates of 0.76% and 0.94% respectively; whereas the historic rate of growth for the period was 0.33% (based on Experian data for the period 1997-2013). On this basis, the Oxford Economics forecast was chosen as the preferred scenario; for whilst it was lower than the Experian forecast, it still represented an ambitious rate of growth in the context of historic trends whereas the Experian forecast was considered unrealistic.
- 3.39 For the HEDNA Update, 2016-based economic forecasts were obtained from both Oxford Economics and Experian. The Experian forecast had reduced substantially, and the new figures suggested a growth of 43,700 jobs over the same period (a compound rate of 0.81%). Therefore, with the benefit of hindsight, the Original HEDNA was right to not rely on the 2015-based forecast. The Oxford Economics forecast had also reduced, but the change was far more marginal with an extra 40,700 jobs forecast for the FEMA (a compound rate of 0.78%). Given the consistency in the Oxford Economics forecasts, the HEDNA Update continued to adopt these as the preferred scenario. Therefore, the alignment of jobs and workers was based on an increase of 40,716 jobs across the FEMA/HMA over the 20-year period 2013-33; which included 16,904 in Aylesbury Vale.

### Labour Force

- 3.40 Considering the future workers for Aylesbury Vale, the HEDNA Update identified that the economically active population would increase by 13,906 persons over the period 2013-33 (figure 113). This was based on the population projections using long-term migration trends, and took full account of changing economic activity rates associated with older people (as a consequence to changes to the pension age), female participation (as a consequence of a cohort change) and young people (as a consequence of staying longer in education) (paras 6.2-19).

- 3.41 Economic activity rates were based on Census data and the Office for Budget Responsibility (OBR) labour market participation projections (para 6.20). The HEDNA Update also took account of the recorded change in unemployment claimants over the period 2013-15, which reduced by 1,278 in Aylesbury Vale (figure 113); however, no further reduction was assumed over the remaining period to 2015-33.
- 3.42 Taken together, the increase in economically active population and the reduction in unemployment suggest that the total number of workers will increase by around 15,184 over the full 20-year period 2013-33; but after taking account of commuting patterns based on Census data, the HEDNA Update took the assumption that this proportion would not change and on the basis the number of residents out-commuting from Aylesbury Vale was assumed to increase by 4,565 workers (4,864 more commuting out of the Buckinghamshire HMA, including many likely to work in Milton Keynes and other surrounding HMAs, offset against 299 fewer commuting from Aylesbury Vale to the south of the HMA). This implied that 10,021 of the extra workers would be available to work in the local area (figure 113).
- 3.43 Considering the future jobs, the HEDNA Update was informed by evidence from Oxford Economics, which identified an extra 16,904 jobs over the 20-year period 2013-33. In considering the future number of jobs the HEDNA Update again considered the impact of commuting. Based on Census data, the analysis assumed that the proportion of jobs filled by commuters to the area would not change and on the basis the number of workers commuting to Aylesbury Vale was assumed to increase by 3,737; so the overall net impact was an increase in out-commuting. This implied that 13,167 of the extra jobs would depend on workers resident in the local area; but some of these jobs would be fulfilled as second jobs – so the total number of people needed would be fewer than the overall number of jobs, and providing for 13,167 extra jobs would only need 12,433 extra workers (figure 113).
- 3.44 Taking account of all of the evidence, the HEDNA Update concluded that there was likely to be a shortfall in workers; with only 10,021 extra workers available when 12,433 would be needed. There was a need to provide 2,412 additional workers to ensure alignment with future employment growth (figure 113).
- 3.45 To provide the additional workers needed, the HEDNA assumed the need for a higher rate of net migration than identified by past trends. Extra migrants would lead to a larger population overall with more economically active people resident in the housing market area. The HEDNA identified that 1,666 additional dwellings would be needed in Aylesbury Vale to provide the 2,412 extra workers needed to ensure alignment with future employment growth. On the basis of the proposed uplift to the housing need, the HEDNA Update identified an overall increase of 17,596 workers resident in Aylesbury Vale; which ensured that the overall number of future jobs and workers aligned.

3.46 The approach is consistent with that used by ORS for the Cheshire East Housing Development Study, although in that assessment the implications for migration were so significant that (unlike in Aylesbury Vale) some of the additional growth was assumed to be addressed through changes to commuting patterns. The Inspector endorsed the approach in his Further Interim Views of the Examination into the Council's Local Plan Strategy (December 2015; CD H.29) (paras 30-32, emphasis added):

*30. Turning to economic factors, the HDS takes on board the conclusions of the revised economic assessment based on a 0.7%/year growth in jobs, equating to a need for 31,400 extra jobs. Taking account of commuting and economic activity rates, and given the ageing population in Cheshire East, this points to a shortfall of almost 11,800 workers compared with demographic projections. Addressing this shortfall through immigration alone would increase the housing need to 37,880 dwellings (1,894 dw/year), in order to provide the houses for the extra workers to take up the balance of the new jobs. However, this would lead to unprecedented additional levels of migration and commuting into Cheshire East, which CEC considers would be unsustainable, unrealistic and undeliverable.*

*31. CEC has examined a range of assumptions about migration and commuting into the borough, and has selected an option which makes modest adjustments to current trends, resulting in a need for almost 36,000 new dwellings, which is seen to be more realistic and sustainable. Even these assumptions would see an average increase of commuting into Cheshire East of some 400 persons/year and increased levels of migration of 2,600 persons/year, the highest level ever achieved; but in the context of overall migration and commuting within the wider area, these would represent relatively modest changes to current migration and commuting levels, involving less than 5% of the total projected number of jobs. Less out-migration may also occur with more jobs being provided in Cheshire East.*

*32. Much depends on the actual patterns of migration and commuting in the future, and in particular, where migrants and commuters come from; not all would necessarily come from the surrounding areas, some could come from much further afield. The crossboundary migration assumptions have been addressed, and neighbouring authorities have commented on the detailed models and projections; the implications seem to be relatively modest in terms of the strategic patterns of migration and commuting and the inter-relationships between the housing and jobs markets and the economic strategies of the adjoining areas. **Having considered all the evidence, discussions and statements at the hearing sessions, CEC seems to have reached a reasonably balanced judgement about the relationship between new jobs and houses, which is supported by***

**the evidence and would result in sustainable levels of migration and commuting and patterns of development, in line with the guidance in the NPPF and PPG [ID-2a-018].**

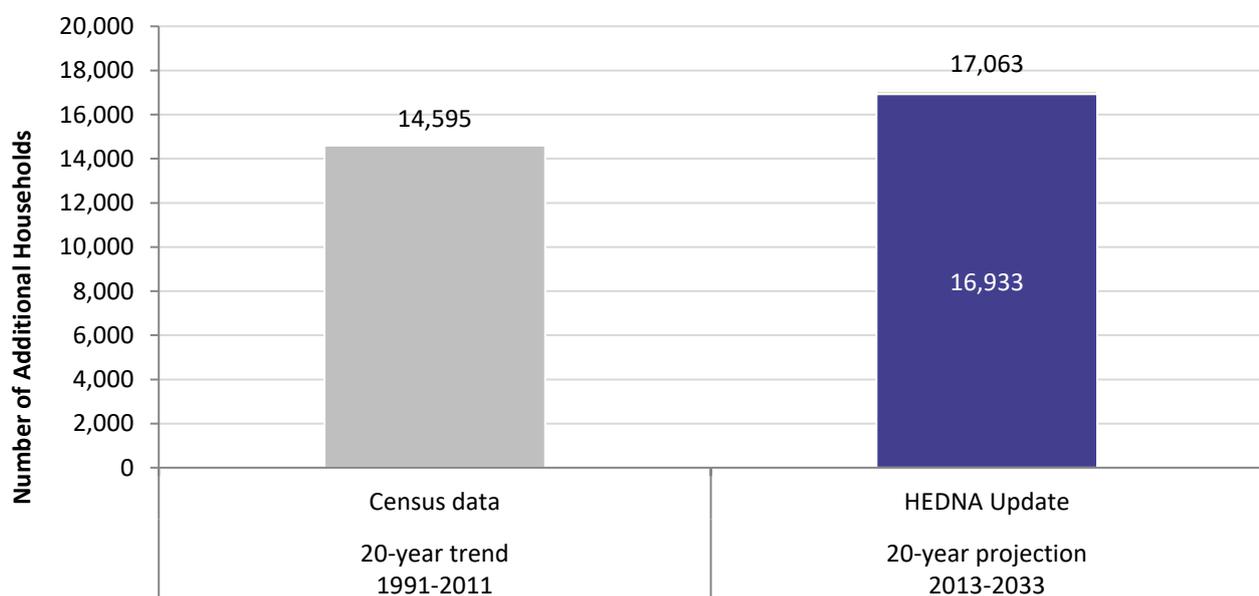
## Household Formation Trends

- 3.47 Given that the household projections are trend-based, it is appropriate to consider how they compare with actual increases in the number of households resident in Aylesbury Vale. However, it is also important to note that PPG identifies that the household projections may require adjustment to reflect the consequences of past under-delivery of housing (ID 2a-015):

*The household projection-based estimate of housing need may require adjustment to reflect ... household formation rates which are not captured in past trends.*

- 3.48 Given this context, the HEDNA Update considers the additional needs from homeless households and concealed families which are not captured in past trends and that otherwise would not be counted. The needs based on household projections are therefore increased to take account of 130 concealed families and homeless households that are additional to the household projections. This response to the past under-delivery of housing increases the overall housing need by an average of 7 households per year over the 20-year period.

- 3.49 The following chart shows the number of additional households resident in Aylesbury Vale – trends from Census data that cover the 20-year period 1991-2011 and projections for the 20-year period 2013-2033 from the HEDNA Update:



- 3.50 The HEDNA Update identifies that an increase of 17,063 households over the 20-year plan period 2013-33, which comprises a growth of 16,933 households based on the HEDNA projection together with an additional 130 concealed families and homeless households that would otherwise not be counted. This is 16% higher than the 14,595 household growth recorded over the 20-year period 1991-2011 based on Census data, but the increases seem to be a plausible measure of the area's own future need.
- 3.51 The HEDNA Update therefore provides realistic household projections for the 20-year period 2013-2033 in the context of trends over the last 20 years.

## Housing Market Signals

- 3.52 The housing market signals indicators indicate that there are considerable housing market pressures in Buckinghamshire HMA; and given that many of these indicators show greater pressures than the national average (in particular the market signals relating to price), the HEDNA Update concluded that the Objectively Assessed Need should be higher than suggested by household projections in isolation and proposed a 15% uplift overall.
- 3.53 However, the HEDNA Update recognised the distinct characteristics of the two local housing market areas within the wider Buckinghamshire HMA and the differentials between their respective housing market indicators. The market signals for Aylesbury Vale in 2013 (the base date for the OAN) were substantially "better" than the indicators for the rest of Buckinghamshire. Indeed, the indicators for Aylesbury Vale were very similar to the indicators for in Eastleigh, where the Local Plan Inspector considered a 10% uplift to be appropriate. On this basis, the Original HEDNA and the HEDNA Update proposed an uplift of 10% uplift for Aylesbury Vale in the north and an uplift of 20% for southern Buckinghamshire (the combined area of Chiltern, South Bucks and Wycombe).
- 3.54 The market signal indicators identified by PPG specifically include the unmet need for housing from concealed families and homeless households (ID 2a-019):

### ***"Overcrowding***

*Indicators on overcrowding, concealed and sharing households, homelessness and the numbers in temporary accommodation demonstrate un-met need for housing."*

- 3.55 Given this context, the adjustment for suppressed household formation already represents a specific uplift responding to market signals based on unmet need for housing, and should be considered as part of the market signals uplift.

- 3.56 Similarly, the need to provide additional housing to balance future jobs and workers will already “*increase planned supply by an amount that ... could be expected to improve affordability*” (PPG ID 2a-020); so this uplift should also be considered as a cumulative part of the response to market signals.

## Establishing OAN

- 3.57 The HEDNA calculates the overall housing need for Aylesbury Vale as follows:

Stage		Households	Dwellings
<b>Demographic starting point</b> CLG household projections 2013-33		<b>21,028</b>	<b>21,836</b>
<b>Adjustments for local demography...</b>	<b>Data quality issues</b> Systematic problems with the population estimates overstating historic population growth	-3,562	-3,699
	<b>Migration trends</b> Long-term trends based on 10-year average	-533	-553
<b>Baseline household projections taking account of local circumstances</b>		<b>16,933</b>	<b>17,584</b>
<b>Adjustment for suppressed household formation rates</b> Concealed families and homeless households		+130	+135
<b>Baseline housing need based on demographic projections</b>		<b>17,063</b>	<b>17,719</b>
<b>Further adjustments needed...</b>	<b>In response to balancing jobs and workers</b> Additional 1,666 dwellings proposed across the sub-FEMA to ensure alignment between future jobs and workers	-	+1,666
	<b>In response to market signals</b> 1,623 dwellings needed (in addition to the 135 dwellings for concealed families and homeless households) to deliver the overall 10% uplift of 1,758 dwellings proposed	-	10% x 17,584 = 1,758 1,758 - 135 = +1,623
<b>Combined impact of the identified adjustments</b>		-	<b>+1,666</b>
<b>Full Objectively Assessed Need for Housing 2011-33</b>		-	<b>19,385</b>

- 3.58 The HEDNA concludes the Objectively Assessed Need for Housing in Aylesbury Vale to be 19,385 dwellings, equivalent to an average of 969 dwellings per year over the 20-year period 2013-33.

## Affordable Housing Need

- 3.59 The HEDNA Update identifies the need for affordable housing in Chapter 4. The overall housing need identified includes the need for both market housing and affordable housing. Affordable housing need represents 4,200 dwellings in Aylesbury Vale over the Plan period 2013-33 (figure 78) with market housing representing the balance of 15,185 dwellings.

- 3.60 The HEDNA Update has properly captured the unmet needs of homeless and other households living in unacceptable accommodation (such as concealed families and sharing households) together with all needs

arising over the 20-year period 2013-33; therefore, the needs of all households have been counted, regardless of whether or not they are able to afford their housing costs. Meeting the identified need for affordable housing will result in some housing currently occupied by established households being released back to the market. Therefore, meeting the affordable housing need in full would offset the need to provide some market housing – so the need for affordable housing does not increase the overall objectively assessed need.

<sup>3.61</sup> It is important to note that the HEDNA Update does not rely upon the private rented sector as a means of reducing affordable housing need; instead, it recognises that households in receipt of housing benefit can afford to access suitable housing in the market as they receive a welfare payment specifically for this purpose, so it would be inconsistent with the PPG to count these households as needing affordable housing (ID 2a-024):

*“care should be taken ... to only include those households who cannot afford to access suitable housing in the market”*

<sup>3.62</sup> The HEDNA Update does caution that if this payment was withdrawn, this would have a substantial impact on the affordable housing need; but the Government has not suggested that there is any intention to universally withdraw housing benefit from those households in the private rented sector, and it is included in the Office for Budget Responsibility long-term economic forecasts.

<sup>3.63</sup> When establishing the Housing Requirement for the Local Plan, PPG states that the Council will need to consider whether or not there is sufficient justification for any further increase in the total housing figures included in the Local Plan (beyond the identified OAN) (ID 2a-029):

*The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. **An increase in the total housing figures included in the local plan should be considered** where it could help deliver the required number of affordable homes.*

<sup>3.64</sup> This would be part of the Council’s policy response to meeting the identified need for affordable housing. It would not change the overall OAN, which is based on the identified housing need and is a “policy off” figure. Any assumed change to housing benefit in the private rented sector would also be a policy-based decision and therefore should not be included in the assessment of affordable housing need.

## 4. Conclusions on Housing Need

- 4.1 The Council accepts that Aylesbury Vale does not have a housing requirement figure in an up-to-date adopted Local Plan, and in such circumstances PPG clearly states that “*the latest full assessment of housing needs*” (ID 3-030) should be considered by the Inspector as the basis for 5-year housing land supply.
- 4.2 The “*Buckinghamshire Housing and Economic Development Needs Assessment Update 2016*” (CD F.2; “the HEDNA Update”) and the associated “*Buckinghamshire HEDNA Addendum (September 2017)*” (CD F.3; “the HEDNA Addendum”) prepared by ORS and Atkins sets out the latest full assessment of housing needs, based on the Buckinghamshire housing market area.

### Establishing the Objectively Assessed Need

- 4.3 The HEDNA Update sets out the Council’s full assessment of housing needs, based on the Buckinghamshire housing market area over the 20-year period 2013-2033. For the purposes of 5-year housing land supply, the OAN should be assessed for Aylesbury Vale district.
- 4.4 The HEDNA takes full account of all of the relevant evidence that affects local demography issues for Aylesbury Vale and provides realistic demographic projections for the 20-year period 2013-2033, based on the most reliable data and set in the context of long-term migration trends.
- 4.5 The HEDNA concludes that it is unrealistic to assume that the short-term migration trends on which the ONS projection is based would be sustained for the full 20-year Plan period, so it is unreasonable to not take account of this. It is notable that most other LAs with comparable levels of proportionate growth are London boroughs, and the GLA has rightly argued that this does not provide a robust basis for planning for the long-term needs of London. For exactly the same reasons, the ONS starting point does not provide a robust basis for planning for the long-term needs of Aylesbury Vale.
- 4.6 The population projections identify that population growth will be 19.4% over the 20-year period 2013-33. This is more realistic than the projection based on short-term migration trends, and it remains within the top 25% of all local authority areas; so the population growth identified by the HEDNA Update is higher than the growth in more than three quarters of all local authority areas in England.

- 4.7 In aligning jobs and workers, the HEDNA Update has been based on employment forecasts prepared by Oxford Economics which identify a jobs-growth of 40,700 jobs for Buckinghamshire HMA over the 20-year period 2013-2033. This represents a compound growth rate of 0.78% per year, and since 1997 there have been no periods of 10-years or more where Buckinghamshire has sustained a higher rate of growth. In terms of assumptions taken relating to the future labour force, the HEDNA Update is fully consistent with the Oxford Economics forecast.
- 4.8 Where additional housing is provided to balance future jobs and workers, it is reasonable to conclude that this will *“increase planned supply by an amount that ... could be expected to improve affordability”* (PPG ID 2a-020) in the same way as providing additional housing for any other reason. There is no reason to conclude that providing extra housing given a need for additional workers would have an impact that is any different to providing extra housing to enable more households to form; so this uplift should also be considered as a cumulative part of the response to market signals.
- 4.9 The Council’s OAN of 969 dpa represents an overall increase in dwellings of 26% over the 20-year Plan period, an average of 1.3% per year.

## Previous Inspectors’ Decisions

- 4.10 The OAN identified by the HEDNA has been tested through previous inquiries and the OAN has been endorsed by those Inspectors. Furthermore, the Secretary of State confirmed on 19 July 2017 that the *“Buckinghamshire Housing and Economic Needs Assessment Update (HEDNA) represents the most up to date assessment of housing need”* (CD H.3, Decision Letter para 24) for Aylesbury Vale. The conclusions reached by both previous Inspectors and the Secretary of State have a substantial bearing on this Inquiry
- 4.11 The Council’s evidence at this appeal is based on a HEDNA that uses the same methodology for assessing overall housing need as has been endorsed by the Inspectors examining the Luton Local Plan (August 2017; CD H.26) and Stevenage Local Plan (October 2017; CD H.27). Their conclusions also have a substantial bearing on this Inquiry.
- 4.12 Whilst the Government published a consultation for a new standard methodology for assessing housing needs, the consultation does not supersede the current approach and the proposed approach may well change in the light of consultation feedback. Both I and the Council have significant concerns about the proposed standard methodology, given that it seeks to provide the *“silver bullet”* that LPEG warned could not be achieved. The consultation does not change the evidence base for OAN at this inquiry.

## Sense Check of Overall Housing Need

- 4.13 The Council's OAN of 969 dpa represents an overall increase in dwellings of 26% over the 20-year Plan period, an average of 1.3% per year.
- 4.14 Achieving a growth of 1.0% nationally would require a 71% increase in current housebuilding rates<sup>5</sup> and would meet Government objectives to delivery one million new homes. The Council's OAN identifies that the need for housing in Aylesbury Vale is 30% higher than the national average, and as such it represents an ambitious and proportionate target for the area.
- 4.15 Any contribution to meeting unmet needs from elsewhere in the housing market area is likely to need a housing target based on the Council's OAN that will require housebuilding rates in the area to be almost double the national average and amongst the highest of all local authority areas in England.
- 4.16 **The basis for calculating the 5-year housing land supply should be the latest full assessment of housing needs for Aylesbury Vale. That is the Buckinghamshire HEDNA, which identifies an OAN of 969 dpa.**

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<sup>5</sup> HEDNA Update, paras 7.15-17

## Appendix 1: List of Acronyms

BANES	Bath and North East Somerset (Local Authority)
CLG	Department for Communities and Local Government
FEMA	Functional Economic Market Area
GLA	Greater London Authority
HDS	Housing Development Study
HEDNA	Housing and Economic Development Needs Assessment
HMA	Housing Market Area
HRR	Household Representative Rate (also known as Headship Rate)
LPEG	Local Plans Expert Group
MYE	Mid-Year (Population) Estimate
NPPF	National Planning Policy Framework (CLG, March 2012)
OAN	Objectively Assessed Need
OBR	Office for Budget Responsibility
ONS	Office for National Statistics
ORS	Opinion Research Services
PAS	Planning Advisory Service
PASC	House of Commons Public Administration Select Committee
PPG	Planning Practice Guidance
SHMA	Strategic Housing Market Assessment
SNPP	Sub-National Population Projections

## Appendix 2: Projected Population Growth 2013-33: Upper Decile

**Local authorities with rates of growth within the upper decile in the ONS 2014-based SNPP**  
with comparison to GLA 2013-round population projection central variant for London boroughs

Rank	Local Authority	MYE Population 2013	2014-based SNPP 2033	Change 2013-33		GLA 2013-round	
				Persons	%	% change 2013-33	Relative to SNPP
1	Tower Hamlets	272,890	397,158	124,268	45.5%	28.1%	-38%
2	City of London	7,648	10,512	2,864	37.4%	11.9%	-68%
3	Barking And Dagenham	194,352	265,071	70,719	36.4%	32.4%	-11%
4	Corby	64,212	84,049	19,837	30.9%	-	-
5	Redbridge	288,272	376,468	88,196	30.6%	25.6%	-16%
6	Newham	318,227	414,086	95,859	30.1%	27.3%	-9%
7	Hackney	257,379	334,490	77,111	30.0%	21.1%	-29%
8	Camden	229,719	297,526	67,807	29.5%	13.8%	-53%
9	Hillingdon	286,806	371,400	84,594	29.5%	22.0%	-26%
10	Islington	215,667	279,151	63,484	29.4%	19.4%	-34%
11	Kingston upon Thames	166,793	215,424	48,631	29.2%	15.7%	-46%
12	Coventry	329,810	424,848	95,038	28.8%	-	-
13	Uttlesford	82,683	106,015	23,332	28.2%	-	-
14	Greenwich	264,008	338,284	74,276	28.1%	17.2%	-39%
15	Central Bedfordshire	264,528	338,022	73,494	27.8%	-	-
16	Barnet	369,088	471,098	102,010	27.6%	22.4%	-19%
17	Lewisham	286,180	363,547	77,367	27.0%	17.9%	-34%
18	Watford	93,736	119,025	25,289	27.0%	-	-
19	Westminster	226,841	287,873	61,032	26.9%	11.5%	-57%
20	Havering	242,080	305,522	63,442	26.2%	18.7%	-29%
21	Dartford	100,569	126,682	26,113	26.0%	-	-
22	Enfield	320,524	402,039	81,515	25.4%	21.5%	-15%
23	Aylesbury Vale	181,071	226,357	45,286	25.0%	Bucks HEDNA Update	
						19.4%	-22%
24	Southwark	298,464	372,903	74,439	24.9%	15.9%	-36%
25	Epsom And Ewell	77,131	96,303	19,172	24.9%	-	-
26	Welwyn Hatfield	114,061	141,907	27,846	24.4%	-	-
27	Richmond upon Thames	191,365	237,499	46,134	24.1%	12.0%	-50%
28	Bedford	161,382	200,236	38,854	24.1%	-	-
29	Hounslow	262,407	325,226	62,819	23.9%	20.9%	-13%
30	Reigate And Banstead	141,073	174,846	33,773	23.9%	-	-
31	Bromley	317,899	393,210	75,311	23.7%	13.3%	-44%
32	Sutton	195,914	242,103	46,189	23.6%	17.6%	-25%
<b>Total for London Boroughs</b>		<b>5,393,594</b>	<b>6,926,947</b>	<b>1,533,353</b>	<b>28.4%</b>	<b>20.0%</b>	<b>-30%</b>