

## **MATTER 21 – THE OBJECTIVE ASSESMENT OF HOUSING NEED ('the OAN')**

**ED171 (Paper A) from North Herts District Council (NHDC)**

**NAME OF REPRESENTOR – David Dorman,**

### **a) Introduction – the overall picture**

- 1) As a non-statistician it is very difficult to criticise the methodology suggested by NHDC to derive new housing projection figures based upon the ONS 2016-based population and household projections, particularly as the workings have been completed by Opinion Research Services – a spin-off company from Swansea University – and described as an 'independent social research practice that works with the public, voluntary and private sectors across the UK in areas of research covering a wide range of social issues including housing'. ORS studies are used by many local authorities.
- 2) The new projections from ORS show an objectively assessed housing need across North Hertfordshire of 12,900 houses (with an average yearly build rate for the 2011-2031 period of 645).
- 3) This is a reduction from the previous figure of 14,000 houses required to meet NHDC's needs underpinning the draft NHDC Local Plan (13,800 houses from within the Stevenage HMA and 200 falling within the Luton HMA in the area around Cockernhoe). The reduction is 1,100 houses across the Local Plan period.
- 4) Cynically, NHDC in its conclusions seems to discount the 200 houses for the Luton HMA area in that it regards the reduction from 13,800 (Stevenage HMA) to 12,900 - a 6% decrease - 900 fewer houses – as not representing a 'meaningful' change.
- 5) The real percentage reduction taking into account the 200 houses NHDC says is required in the Luton HMA is from 14,000 to 12900 – 1,100 houses or more like an 8% reduction. For NHDC to regard the downgrading of its requirement by 1,100 houses or 8% as not a 'meaningful change' demonstrates its arrogance and disregard for its citizens. In areas that are under threat – particularly small rural communities in the Green Belt – a drop of 8% or 1,100 homes represents potentially a very major change.

### **b) But what of the houses NHDC proposes to build to help meet Luton's unmet needs? We need an OAN to cover this issue.**

- 6) For those of us living in the threatened Green Belt areas of Cockernhoe, Mangrove Green and Tea Green, NHDC proposes to build 1,950 houses in this area to help meet Luton's unmet housing need. Such a huge number of houses engulfing this rural community (with its 200 houses and total population of around 500, equating to 0.22% of the population of Luton ) means that this area could potentially meet 21% of the 9,300 unmet housing need from within Luton, according to the current Luton Local Plan.
- 7) Whilst the Inspector is rightly re-examining the revised OAN statistics for the NHDC area itself, we contend that he also must look at the houses that NHDC proposes to build in the area around Cockernhoe. In particular, it is important to realise that the issue of the unmet

housing need arising from Luton straddles three other local authorities – Luton, Central Bedfordshire and Aylesbury Vale - that together make up the Luton Housing Market Area (HMA). Both NHDC's and Aylesbury Vale's current contributions to the Luton HMA in housing and population terms are statistically insignificant.

- 8) The Local Plans of these three authorities, in as much as they impact on the requirement to help meet Luton's unmet housing needs, are inextricably linked. It is pointless just examining the revised OAN for NHDC without also examining those OANs that underpin the Luton and Central Bedfordshire areas and the Luton HMA in particular, especially since it potentially impacts so severely on a rural 'significant' Green Belt area within the NHDC jurisdiction.
- 9) At the very least it would appear prudent to argue for a revised objectively assessed OAN from both Luton and Central Bedfordshire Council for the period 2011-2031 that is based upon the 2016 ONS revised population/household projections, so that a proper and meaningful comparison can be made. However, Luton's Local Plan is now adopted and the Borough has indicated in correspondence that it is not proposing to do a revised OAN. Meanwhile Central Bedfordshire's draft Local Plan is several months behind that of NHDC and is also subject to some intense scrutiny by the Inspectorate, not least looking at the ability of Central Bedfordshire to meet its proportion of the unmet housing needs from within Luton, but also the locations it proposes for this purpose.
- 10) It also doesn't aid the comparison required that Central Bedfordshire's Local Plan covers the 2015-2035 period which makes direct comparisons trickier. More fundamentally, due to being several months behind that of NHDC, there is a grave danger that a decision may be made in regard to the NHDC Local Plan which in terms of the East of Luton sites could seriously be compromised by later decisions coming from the Central Bedfordshire examination. **We need this whole process to be joined up.**
- 11) It is noted by those experts compiling the housing projection statistics that this is not an exact science. To underline this there are several different analyses available all with differing results in terms of the housing needed to meet Luton's unmet needs.
- 12) At Appendix A is a straightforward analysis of some of these differing projections. These range from the figures underpinning the current NHDC draft Local Plan and the Luton Borough Council adopted Local Plan, through to indicative projections delivered from the issuing of the ONS 2016 population and household statistics, as well as a reasonably recent OAN (for the 2015-2035 period) for Central Bedfordshire and Luton prepared in December 2017 (but before the ONS 2016 statistics were issued). In this latter case – and in the absence of a definitive OAN from Luton and Central Bedfordshire covering the 2011-2031 timeframe - we have prepared a simple calculation that subtracts 4 years-worth of averaged annual building rates to give an approximation of how the figures could look through to 2031 only.
- 13) It is worth adding that if an OAN were produced for the 2011-2031 period for Luton and Central Bedfordshire based on the ONS 2016 statistics, it would almost certainly show a reduction in the number of houses needed from Luton.
- 14) These different analyses vary from the current established unmet housing need from Luton at 9,300, through to a range from as low as 4,250 through to 6,700 and then to 8,500 houses at the higher end of the spectrum. **Note that all of them project a lower unmet housing need than currently underpins the Luton Local Plan.**

- 15) The latest and most relevant figure of 6,700 houses is derived from the newest OAN 2015-2035 projection for Luton and Central Bedfordshire, to which annual averaged building rates have been subtracted to allow for the 4 years less of that statistic and therefore to marry up with the 2031 period of both the Luton and NHDC Local Plan periods.
- 16) With Central Bedfordshire committed to building 7,350 houses to meet its part of the Luton unmet housing need, this means that on this latest set of statistics the 7,350 houses from Central Bedfordshire would comfortably exceed the 6,700 houses needed in Luton, and thus, without any contribution from NHDC.
- 17) This analysis also takes no account of the actual building rates being achieved in Luton itself. As we discuss in Matter 24, Luton has a consistent historical track record over the past 25 years or more of over-delivery on its housing targets. Its own Local Plan states that it is committed to build **at least** 8,500 houses during the 2011-2031 period. We have no doubt that Luton will build considerably more than 8,500 houses, thus further reducing its unmet housing need.
- 18) It is frankly shocking that in order to continually pursue its stated aim of building the 1,950 houses to the east of Luton to meet the unmet housing needs of Luton, NHDC never seems (in all documentation we have seen) to take any notice of Luton's past house building track record, current build rates, new developments and brownfield sites earmarked for future housing use.

### **c) Overall conclusions**

- 19) **It would seem that the new OAN for NHDC has been arrived at on a robust basis, but we contend that there is also a need for an OAN for Luton and Central Bedfordshire covering the period 2011-2031 and taking into account the latest ONS 2016 statistics so that a proper and accurate comparison can be made as to what exactly the Luton unmet housing need might be.**
- 20) **We also contend that NHDC's dismissal of its new statistics as not representing a 'meaningful change' is cynical and self-serving. It is at the very least an 8% reduction in housing need which to those rural communities threatened in the Green Belt potentially could be very significant.**
- 21) **It is abundantly clear that the statistics underpinning housing need are 'not an exact science'. In areas of North Hertfordshire – such as the East of Luton sites – where projected housing and other development is predicated on one set of statistics while other sets show widely differing results – it is not something the community can rely upon, especially when the potential outcomes of such developments will be so damaging to the communities and the Green Belt that protects them.**
- 22) **We contend that there is a meaningful change in the housing situation across North Hertfordshire, and this is particularly relevant to the area around Cockernhoe to the East of Luton. Despite the lack of definitive OAN statistics for Luton and Central Bedfordshire for the period 2011-2031 using as a basis the ONS 2016 projections, other analyses all point to a lower unmet need from within Luton to the extent that the 1,950 homes earmarked by NHDC are most definitely not needed.**
- 23) **Consequently, our recommendation is that the Local Plan should be modified by the removal of these projected 1,950 homes proposed for build in the East of Luton sites.**

**APPENDIX A - ANALYSIS OF OAN COMPARISONS**

<b>AUTHORITY AREA</b>	<b>OAN 2011-2031 UNDERPINNING NHDC &amp; LUTON LOCAL PLANS (a)</b>	<b>INDICATIVE OAN BASED ON 2016 STATISTICS (b)</b>	<b>LICHFIELD OAN INDICATIVE FIGURES BASED ON ONS 2016 STATISTICS (c)</b>	<b>OPINION RESEARCH SERVICES REVISED OAN FIGURES 2011-2031 FOR NHDC USING ONS 2016 STATISTICS (d)</b>	<b>OPINION RESEARCH SERVICES REVISED OAN FIGURES 2015-2035 FOR LBC AND CBC (PRIOR TO ONS 2016 STATISTICS BEING ISSUED) (e)</b>	<b>SUBTRACTION OF FOUR YEARS FROM OPINION RESEARCH SERVICES 2015-2035 TABULATION TO BRING TO END DATE OF 2031 (f)</b>
<b>1) NHDC</b>						
<b>Annual</b>	<b>690</b>	<b>550</b>	<b>716</b>	<b>645</b>	<b>n/a</b>	<b>n/a</b>
<b>20 year total</b>	<b>13,800</b>	<b>11,000</b>	<b>14,320</b>	<b>12,900</b>	<b>n/a</b>	<b>n/a</b>
<b>2) Luton BC</b>						
<b>Annual</b>	<b>890</b>	<b>850</b>	<b>651</b>	<b>n/a</b>	<b>950</b>	<b>-3800</b>
<b>20 year total</b>	<b>17,800</b>	<b>17,000</b>	<b>13,020</b>	<b>n/a</b>	<b>19,000</b>	<b>15,200</b>
<b>(Unmet need)</b>	<b>9,300</b>	<b>8,500</b>	<b>4,520</b>	<b>n/a</b>	<b>n/a</b>	<b>6,700</b>
<b>3) Central Beds Council</b>						
<b>Annual</b>	<b>1,475</b>	<b>1,765</b>	<b>2,224</b>	<b>n/a</b>	<b>1,600</b>	<b>-6,400</b>
<b>20 year total</b>	<b>29,500</b>	<b>35,300</b>	<b>44,480</b>	<b>n/a</b>	<b>32,000</b>	<b>25,600</b>

**Notes to Appendix A:**

**Column (a) derived from HOU3 August 2016 (updating the overall housing need by Opinion Research Services)**

**Column (b) derived from ED159 Appendix B – Extracts from Lichfields analysis of 2016-based household projections**

**Column (c) derived from ED159 Appendix B – Extracts from Lichfields analysis of 2016-based household projections**

**Column (d) – derived from ED171 page 5 Para 15**

**Column (e) – derived from Luton & Central Bedfordshire Strategic Housing Market Assessment December 2017 (issued January 2018) – Section 5 (Objectively Assessed Need) Para 5.90 – page 112**

**Column (f) – subtraction of four year's housing build from both LBC and CBC to provide an estimate of what the housing need would be in those two areas through to 2031 rather than 2035.**



