

MATTER 22

APPENDIX B (REVISED)

ANALYSIS OF OANS/MARKET SIGNALS AND HOUSING NUMBERS – (NO ADDITION OF 1,470 HOUSES DUE TO SUPPOSED SUPRESSED DEMAND) AND RESULTING IMPACT OF ADDING DIFFERENT BUFFERS

SOURCES: (a) ORS REVIEW OF THE OFFICIAL PROJECTIONS FOR NORTH HERTFORDSHIRE

(b) REVISED PROPOSED HOUSING TRAJECTORY AS OF 1 APRIL 2020

Methodology

A – I have taken the three household projections supplied by ONS for its 2018-based projections covering the 2-year trend, the 5-year trend and the 10-year trend. The highest trend is the 10 year trend which is favoured by ORS in its analysis. To each of those three trends I have calculated market signals ranging from -20% to +10% to give indicative OANs. ORS favours the OAN calculated using the highest market signal – an uplift of 10%. The 2-yr calculations are shown in black; the 5-yr calculations are in red; and the 10-year calculations are depicted in green.

B – To these OAN figures I have deducted the 1,400 houses which NHDC says will be built on the East of Luton sites through to 2031, ostensibly to meet so-called unmet needs from Luton. We have proved in Matter 24 that an unmet need from Luton hardly exists so it does mean that we are justified in removing those houses from the tabulation – particularly as there is severe doubt as to whether that lesser number of houses can ever be built on this land due to it contravening the stance taken by Herts County Council in relation to secondary school provision on this site where they say it can only be justified if the total allocation of 2,150 houses are built.

C – I then apply 6%, 13% and 20% buffers to the resulting numbers, concentrating on the three OANs with -5%, -10% and -15% Market Signals and for comparison the +10% Market Signal applied to the ORS/NHDC preferred and higher OAN

D – I then deduct houses already built during this Local Plan period (2,814) – built between 2011- March 2020 (Source: Revised Proposed Housing Trajectory completions – base data 1 April 2020)

E - From the same Trajectory tabulation as above I have deducted the number of house permissions granted on 32 sites across North Herts as these are houses that are being built for completion through mostly to 2024 and totalling 1,962. Adding this 1,962 to the 2,184 already completed houses gives a running total of 4,776 houses built or being built.

F – From here and still using NHDC’s Trajectory I deduct a further 1,649 houses as these are proposed allocations from 25 non-Green Belt sites (BA5, BA7, BA11, BK2, BK3, HT8, HT10, LG4, LG5, LG6, LG8, LG10, LG13, LG15, LG16, LG18, PR1, RD1, RY4, RY7, RY11, TH1 and Windfalls 1 – small sites) that are scheduled to start delivering house builds during the period from 2022-2031.

G –These are the resulting calculations that show the overall effects of the differing OANs and the buffers applied

F DEDUCT PROPOSED ALLOCATIONS FROM TRAJECTORY NOT IN GREEN BELT (-1649)					-1212 -868 -523	-818 -447 -77	-501 +30 +368		+2223 +2732 +3297
G RESULTING CALCULATIONS SHOWING AFFECT ON HOUSING OAN NUMBERS					-1212 (overbuild of 1212) -868 (overbuild of 868) -523 (overbuild of 523)	-818 (overbuild of 818) -447 (overbuild of 447) -77 (overbuild of 77)	-501 (overbuild of 501) +30 (shortfall of 30) +368 (shortfall of 368)		+2223 (shortfall of 2223) +2732 (shortfall of 2732) +3297 (shortfall of 3297)

Conclusion

Using the -15% Market Signal applied to the 5-year trend variant, results in an over build of housing delivery ranging from 523 to 1,212 over the period of the Local Plan, no matter what buffer is applied. With the -10% Market Signal applied results in an over build of 77 – 818 using all the buffers. The -5% Market Signal delivers an over build of 501 using the 6% buffer, but with the 13% and 20% buffers applied results in shortfalls of building of 30 and 368 respectively. The shortfalls in all these scenarios are relatively small, however and might be considered to be in the realms of acceptable statistical error.

Where this is an over build, these figures indicate that there would be no need for the other contentious Green Belt sites to be utilised.

The analysis also indicates that taking the NHDC preferred (as calculated by ORS) 10-year variant and with their +10% Market Signal added, but with the removal of the contentious 1,470 houses from the flawed analysis and also the removal of the 1,400 houses from the east of Luton

sites, results in between a 2,223 to 3,297 shortfall in house building during the Local Plan period, further indicating that this is the least effective of the models to follow But it also does mean that the some of the remaining 5,903 proposed housing allocations in the Green Belt (excepting the east of Luton sites which have already been deducted) could also be saved.

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