## **APPENDIX B**

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

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 and originally to meet so-called unmet needs from Luton. But, NHDC has now changed its tune in para 31/32 of its paper 'Housing delivery and five-year housing land supply as at April 1 2020'. We have proved in Matter 24 that an unmet need from Luton hardly exists, so the Council is now saying these 1,400 houses are now needed as a buffer for North Herts own requirements. While we disagree profoundly with that about-turn by NHDC, it does mean that we are justified in removing those houses from the tabulation (as they are now stated to be for North Herts needs) 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 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)
- **D** 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 to 2024 and totalling 2,075. Adding this 2.075 to the 2,184 already completed houses gives a running total of 4,889 houses built or being built.

**E** – From here and still using NHDC's Trajectory I deduct 222 houses as these are proposed allocations from 6 sites (BA5, BK2, BK3, LG18, RY7 and Windfalls 1 – small sites) that are scheduled to start deliver delivering house builds during the period from 2022-2024. None of these sites or houses are in the Green Belt.

**F** – from figure E we need to deduct the remaining planned allocations in the Trajectory that are yet to be given full permission or to finish the completion of the site allocation (BA5, BA7, BA11, BK2, BK3, HT8, LG18, PR1, RD1, RY4, RY7, RY11, TH1, Broad Locations -1, Windfalls 1 – small sites, Windfalls 2 – large sites). These come to a further 1,011 houses, none of which are in the Green Belt.

Α	ONS 2 YEAR	ONS 5 YEAR	ONS 10 YR	OAN MKT SIGNAL - 20%	OAN MKT SIGNAL -15%	OAN MKT SIGNAL -10%	OAN MKT SIGNAL -5%	OAN MKT SIGNAL +5%	OAN MKT SIGNAL +10%
	6393			5114	5434	5753	6073	6713	7032
		7433		5946	6318	6690	7061	7805	8176
			8638	6910	7342	7774	8206	9070	9502
B DEDUCT 1400 HOUSES FROM EAST OF LUTON SITES				3714 4546 5510	4034 4918 5942	4353 5290 6374	4673 5661 6806	5313 6405 7670	5632 6776 8102
C DEDUCT 2,814 NHDC HOUSES BUILT TO MARCH 2020				900 1732 2696	1220 2104 3128	1539 2476 3560	1859 2847 3992	2499 3591 4856	2818 3962 5288

D DEDUCT 2,075 NHDC HOUSE PERMISSIONS GRANTED TO 2031	-1175 -343 +621	-855 +29 +1053	-536 +401 +1485	-216 +772 +1917	+424 +1516 +2781	+743 +1887 +3213
E DEDUCT PROPOSED ALLOCATIONS FROM TRAJECTORY NOT IN GREEN BELT (-222)	-1397 -565 +399	-1077 -193 +831	-758 +179 +1263	-438 +550 +1695	+202 +1294 +2559	+521 +1665 +2991
F DEDUCT REMAINING ALLOCATIONS FROM TRAJECTORY NOT IN GREEN BELT (-1011)	-2408 (overbuild of 2408) -1576 (overbuild of 1576) -612 (overbuild of 612)	-2088 (overbuild of 2088) -1204 (overbuild of 1204) -180 (overbuild of 180)	-1769 (overbuild of 1769) -832 (overbuild of 832) +252 (shortfall of 252	-1449 (overbuild of 1449) -461 (overbuild of 461) +684 (shortfall of 684)	-809 (overbuild of 809) +283 (shortfall of 283) +1548 (shortfall of 1548)	-490 (overbuild of 490) +654 (shortfall of 654) +1980 (shortfall of 1980)

## Conclusion

Using any of the three OANs I suggest of the 5-year trend variant, and with Market Signals of between -5%, -10% and -15% applied, results in an overbuild of housing delivery ranging from 461 to 1,204 over the period of the Local Plan. These numbers also indicate that there would be sufficient latitude to allow some other significantly impacted and contentious Green Belt sites to be spared.

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 close to a 2,000 (1,980) shortfall in house building during the Local Plan period.