

# Examination of the North Hertfordshire Local Plan (2011-2031)

## Examination hearing sessions

### Statement of North Hertfordshire District Council

#### Matter 3 – The housing strategy: the objectively assessed need for housing and the housing requirement (Policy SP8)

##### The objectively assessed need for housing

**3.1. Figure 3 of the Plan identifies most of the District as being within the Stevenage Housing Market Area (HMA) and part of it as being within the Luton HMA. This is based on the conclusions of Housing Market Areas in Bedfordshire and Surrounding Areas – Report of Findings (December 2015) by Opinion Research Services [HOU2]. Is this a robust evidential basis?**

1. The Council considers the ORS study to provide a robust evidence base. The Council's Duty to Cooperate Compliance Statement (SOC1, p.10) explains that this study was jointly prepared by seven authorities across Hertfordshire, Bedfordshire and Buckinghamshire.
2. The study provides a shared understanding of the geographical definition of HMAs across a wide area. The methodology and findings of HOU2 are broadly consistent with the approach taken in the evidence base and plans of other authorities outside of the commissioning partners above, notably neighbouring East Hertfordshire.
3. The robustness of the study has been considered, particularly in relation to the definition of the functional Luton HMA, at the recent examination of Luton's Local Plan. The Inspector concluded that "*the broad boundaries [of the Luton HMA] appear to have been reasonably defined*" (ED4, paragraph 81, p.18).
4. The methodology of the study follows advice in Planning Practice Guidance (PPG). This identifies three different sources of information to broadly define HMAs<sup>1</sup>:
  - House prices and rates of change;
  - Household migration and search patterns; and
  - Contextual data such as travel to work area boundaries, retail and school catchment areas.

##### House prices and rates of change

5. House prices and rents are considered in Chapter 4 (HOU2, paragraphs 4.15 to 4.25, pp.42-45). This section notes that, when considered against Broad Rental Market Area (BRMA) boundaries, clearer house price patterns do begin to emerge (see Figure 36,

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<sup>1</sup> Planning Practice Guidance Paragraph: 011 Reference ID: 2a-011-20140306, "How can housing market areas be defined?", <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

p.43). It is also demonstrated that the BRMA boundaries are broadly consistent with a number of the commuting zones identified elsewhere in the study (Figure 37, p.45)

Household migration and search patterns

6. Chapter 4 of HOU2 (pp.37-45) also considers household migration flows (paragraphs 4.4 to 4.14, pp.38-41). The method is consistent with the advice in PPG in excluding long distance moves and generally seeking to identify containment levels of around 70% (see Figure 34, p.41).

Contextual data such as travel to work area boundaries

7. Chapter 3 of HOU2 (pp.23-36) contains detailed analysis of commuting patterns. The methodology for the initial analysis is clearly established at paragraphs 3.7 and 3.8 (pp.24-27). Different levels of 'containment' of commuting patterns are then considered at Middle Super Output Area (MSOA) level and then reviewed and refined based upon stakeholder feedback (paragraphs 3.14 to 3.22) and through the use of finer grain geographies (paragraphs 3.23 to 3.29, pp.32-34). The final commuting zones are established in Figure 28 (p.35) of HOU2.
8. The study explains how these analyses are reconciled to produce a final series of 'functional' HMAs (HOU2, paragraphs 5.3 to 5.7 and Figure 38, pp.46-47). These are the HMAs identified by paragraph 47 of the NPPF as the areas in which it should be ensured that housing needs are met in full subject to consideration of relevant constraints. The definition of these functional HMAs is not constrained by authority administrative boundaries.
9. The significant majority of NHDC is identified as lying within the functional Stevenage HMA. This stretches broadly along the A1/A1(M) corridor from Sandy in the north to Welwyn Garden City in the south (HOU2, Figure 38, p.47 and paragraphs 5.18 to 5.19, p.49).
10. A small area at the west of the district lies within the functional Luton HMA (HOU2, Figure 38, p.47 and paragraphs 5.14 to 5.15, p.49).
11. These are the HMAs reproduced in the plan at Figure 3 (LP01, p.17).
12. HOU2 also identifies a series of 'best fit' relationships within the study area. These are constrained to authority boundaries. The study recommends that these are the groupings which should seek to work together to prepare Strategic Housing Market Assessments and develop policy (HOU2, paragraphs 5.20 to 5.24, p.50).
13. HOU2 identifies, at paragraph 5.38, that Stevenage and North Hertfordshire provide an appropriate 'best fit' for the functional Stevenage HMA (paragraph 5.38, p.52). This advice has been followed in the production of the joint SHMA (and associated updates) by the two authorities (HOU3, HOU4, HOU5).

**Paragraph 2.39 of the Plan says that the objectively assessed need for housing ('the OAN') in the District over the plan period (2011 to 2031) is 13,800 homes.**

**(a) I understand that this stems from the conclusions of Updating the Overall Housing Need Based on 2014-based Projections for Stevenage and North Herts (August 2016) by Opinion Research Services [HOU3]. Is that correct?**

14. Yes. The OAN for the District is established in document HOU3. This provides an updated assessment of the overall housing requirement using the latest, 2014-based Government population and household projections as the starting point<sup>2</sup>.

**(b) Does the 13,800 figure include housing need arising in the part of the District that falls within the Luton HMA?**

15. Yes. The 13,800 figure is the OAN for the whole district as set out in paragraph 17 / p.4 of HOU3. It therefore includes housing need arising in that small part of the District that falls within the Luton HMA.

16. HOU2 shows (Figure 39, p.48) that, based upon resident population at the time of the 2011 Census, 1.3% of the population of North Hertfordshire lived within the functional Luton HMA with the remaining 98.7% within the functional Stevenage HMA.

17. On a pro-rata basis, the district-wide OAN for North Hertfordshire therefore splits into figures of 13,600 within the Stevenage HMA and 200 within the Luton HMA<sup>3</sup>.

18. This approach is used within the analysis in the *Housing & Green Belt Background Paper* in relation to the Stevenage HMA (HOU1, Table 4, p.15). This approach to the disaggregation of district-level OAN was accepted at the examination of the Luton Local Plan in relation to the Luton HMA (ED4, paragraph 108, p.23 and associated Main Modifications).

**(c) Does Stevenage accept that its OAN is 7,600 homes, as HOU3 indicates, and has its Local Plan been based on that OAN figure?**

19. Paragraphs 19 to 26 of this answer have been jointly agreed by NHDC and Stevenage Borough Council (SBC).

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<sup>2</sup> Paragraphs 5.3 to 5.8 of the Housing and Green Belt Background Paper (HOU1, p.26) explain the relationship between HOU3, HOU4 and HOU5 and set out why the detailed analysis in the SHMA remains valid in light of the updated overall assessment of housing need in HOU3.

<sup>3</sup> Figures rounded to the nearest 100,

20. The SBC plan was submitted for examination in July 2016 with hearing sessions held between January and March 2017. Main Modifications were consulted upon in June and July 2017. The Inspector's report (ED16) was issued in October 2017.
21. The evidence base for the SBC Plan identified the OAN for Stevenage as 7,300 homes based on the findings of HOU4 and the 2012-based population and household projections. These were the most up-to-date Government population and household projections at the point of the SBC Plan's consultation and submission
22. The SBC Plan sets a housing target of 7,600 allowing for a 300 home uplift over this figure, to increase provision of much-needed affordable homes within the Borough.
23. Prior to the SBC hearing sessions, the 2014 revised household projections were released. HOU3 was prepared jointly by NHDC and Stevenage Borough Council (SBC) in August 2016 to investigate what the OAN would be taking into account these new projections<sup>4</sup>. As set out in the NHDC Plan, this work concluded that the OAN for Stevenage should be calculated as 7,600 if it was to be based on these updated figures (LP1, paragraph 2.39, p.16).
24. The recent Inspector's report into the SBC Plan concludes that
- For the purposes of that plan, an OAN figure of 7,300 as set out in HOU4 is justified (ED16, paragraph 37, p.9);
  - That taking into account the findings of HOU3, the difference to Stevenage's housing requirement is "extremely limited, and in this context is not meaningful" and that this did not render HOU4 out of date for the purposes of that examination (ED16, paragraph 22, p.7); but
  - That, in setting the housing target for the Plan, an uplift to 7,600 homes is justified in any instance (ED16, paragraph 38, p.9); and
  - The plan includes a "sizeable" yet "sensible" buffer of sites and allocations over and above this target ensuring "greater flexibility in meeting the OAN" (ED16, paragraph 46, p.10).
25. In summary, SBC is providing sufficient homes to meet its full OAN under the findings of either HOU3 or HOU4 and is not asking NHDC to meet any of its needs.
26. The Memorandum of Understanding between NHDC and SBC agrees that the two authorities would both (at least) meet their own OAN based on the findings of HOU4 and that consequently there is no shortfall in provision within the 'best fit' HMA (MOU11, paragraph 4.8). This resolves the objection previously raised in SBC's representations on this matter<sup>5</sup>.
27. Further to the above, NHDC relies on the updated figure set in HOU3 as its OAN as this is based upon the most up-to-date Government population and household projections at the point of the Plan's consultation and submission. However, the NHDC

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<sup>4</sup> This joint work is also referenced in SOC1, p.10

<sup>5</sup> Representor reference 7993 in relation to Policy SP8 (within representation 5496)

plan is similarly allocating sufficient homes to meet its full OAN under the findings of either HOU3 or HOU4 (see NHDC's Matter 4 statement).

**3.3 What methodological approach has been used to establish the OAN, and does it follow the advice set out in the Planning Practice Guidance (under the heading 'Methodology: assessing housing need')? In particular:**

**a) I understand that the OAN is based on applying a 10 year migration trend (2005 to 2015) to the ONS 2014-based sub-national population projections and the Government's 2014-based household projections. Is that correct? If so, why? Why is this more appropriate than the 'starting point' estimate provided by the Government's household projections?**

28. The "starting point" estimate for OAN is the CLG household projections, and the latest published data is now the 2014-based projections for period 2014-39. These projections suggest that household numbers across the study area (the combined area of Stevenage and North Hertfordshire LPAs) will increase by 21,289 over the 20-year period 2011-31. This represents 21,841 dwellings after taking account of transactional vacancies and second home ownership (HOU4, paragraph 5, p.2).

29. Given that the demographic projections are trend-based, one of the most critical factors is the period over which those trends are based. This issue was discussed in detail in the Original SHMA from paragraph 2.10 onwards (HOU4, pp.11-12). The CLG 2014-based household projections are based on the ONS 2014-based sub-national population projections (SNPP), which are informed by migration trends from the 5-year period 2009-14.

30. On balance, the SHMA concludes that:

- 5-year trend migration scenarios are unlikely to be robust: 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 (HOU4, paragraph 2.13, p.12).

31. This SHMA, therefore, produced additional projections based on long-term migration trends as part of the analysis. We have adopted this approach systematically across all SHMAs that we have undertaken since the publication of the NPPF, and the approach is also fully consistent with the work undertaken by the GLA for Greater London. On this basis, the OAN for North Hertfordshire includes long-term in-migration from London.

32. This issue has been considered within the HMA by the Inspector for the Stevenage Local Plan who concluded in their report of October 2017 from paragraph 25 onwards that:

*25. In terms of migration trends between the SHMA area and London, the SHMA builds in an adjustment of -2,121 dwellings (for 20 year period), based on 10 year migration trends from 2001-2011. The SHMA explains this difference is due to the underlying population projections. The long-term migration trends suggest lower net migration rates for both Stevenage and North Hertfordshire. These migration rates are partly due to errors in the population estimates over the last 10 years which were corrected following the 2011 Census.*

*26. The Council's SHMA update 2015 was based on migration trends for the 10-year period 2001-11, when average net migration from London to Stevenage averaged 411 persons each year. This is a higher rate than the average 343 persons assumed by the GLA in the 2013-round figures.*

*27. The Council met with the GLA to discuss cross-boundary migration and the issue of the "knock-on" consequences of their assumptions. It was agreed that long-term migration trends would provide an appropriate basis for establishing OAN for areas surrounding London.*

*28. Using a 10 year trend results in a combined figure for Stevenage and North Hertfordshire of 19,714 dwellings (21,835 – 2,121). I am satisfied that this figure has been arrived at based on a method that is robust and is consistent with the latest GLA figures and the assumptions made in the London Plan.*

*29. As such, I agree that a 10 year trend migration scenario is the most appropriate in this case. (ED16, pp.7-8)*

**b) An uplift has been added to the OAN to take account of concealed families and homeless households. Precisely what level of uplift is used? How has this figure been arrived at and is it justified?**

33. The analysis of overcrowding for the SHMA Update from paragraphs 3.58-3.68 identified that the overall housing need should be increased by 244 households to take account of concealed families and a further 65 homeless households that would not be captured by the household projections. The concealed households represent families (couples or lone parents) who live as part of another household and who would typically require their own affordable home. The households are identified by the growth in concealed families between the 2001 Census and the 2011 Census and local authority homelessness records (HOU4, pp.46-47).

**c) An uplift of 10% has been added to reflect market signals. I understand that this relates to house prices – in short, that it is to improve affordability. Is that correct? How has this 10% figure been arrived at and is it justified?**

Market Signals

34. The proposed market signals uplift of 1,300 dwellings in addition to the household projection-based estimate of housing need is informed by a specific analysis of the underlying drivers: specifically affordability and overcrowding.
35. The SHMA 2015 compared the HMA with similar economic and demographic areas and concluded that the market signals measures generally indicate that there is less housing market pressure in Stevenage and North Hertfordshire than in comparable areas. Nevertheless, given that all of these areas show greater pressures than the national average the SHMA concluded that the OAN for Stevenage and North Hertfordshire should be higher than suggested by household projections in isolation.
36. There is no definitive guidance on what level of uplift is appropriate. The Inspector examining the Eastleigh Local Plan judged 10% to be reasonable given the market signals identified for that HMA. The indicators identify similar housing pressures for Stevenage and North Hertfordshire to Eastleigh (and its wider HMA), so it would seem reasonable for 10% to also be considered as a response to Market Signals across the Stevenage and North Hertfordshire area as a whole (HOU4, paragraphs 3.37 to 2.78, pp.40-51).
37. This issue was also considered within the HMA by the Inspector for the Stevenage Local Plan who concluded from paragraph 32 onwards that:
- 32. The SHMA concludes that these indicators show that there is less housing market pressure in Stevenage and North Hertfordshire than other comparable areas; these other areas show greater pressures than the national average, particularly in relation to price.*
- 33. The SHMA provides an analysis of the number of concealed families and homeless households. An adjustment of 317 dwellings is therefore necessary to account for the suppressed household formation rates across the SHMA area.*
- 34. As such a 10% market signals adjustment is suggested as a response to help address market pressures and I agree that this is appropriate. This equates to an additional 1,971 dwellings (including the 317 dwellings necessary to deal with suppressed households) across the SHMA area over the 20 year period. (ED16, p.8)*
38. When considering the appropriate uplift for the two areas individually, none of the indicators are sufficiently acute to suggest the need for a differential approach to Market Signals in the two areas.

Benchmarking the Response to Market Signals

39. In order to provide a wider benchmarking of market signals and the associated responses, we have considered the OAN informing all Local Plans prepared across the Wider South East (i.e. the former East of England and South East Government Office Regions) which have been adopted in the last 2 years. We have also included evidence on the OAN informing Local Plans that are currently under examination where the Inspector's final report or an interim view has been published.
40. A summary of the household projection-based estimate of housing need, the final OAN and the percentage uplift is provided in the schedule in Appendix A. Note that these figures relate to the housing need rather than the final housing target included in each Plan (which is sometimes higher and sometimes lower than the identified housing need).
41. When considering uplifts for market signals alone, only three areas have a proportionately higher figure than the 10% that ORS has proposed for North Hertfordshire. These are:
- Luton, where ORS proposed an increase of 20% due to acute overcrowding and homelessness pressures);
  - Lewes, where responding to suppressed household formation yielded an uplift of 13%; and
  - Mid Sussex, where the LPA had proposed to only uplift in response to suppressed household formation, but the Inspector concluded that a further uplift was justified, and his interim views recommended that this should be 20%.
42. The only effective way to compare the OAN across different authorities is to consider the overall rate of growth in relation to the existing dwelling stock. The chart in Appendix B identifies the rate of growth necessary to meet the housing need based on household projections together with the uplifts applied for market signals and aligning jobs and workers.
43. It is clear that the rate of growth identified for North Hertfordshire based on the OAN (1.22% per year) is in the middle of all adopted plans across the Wider South East (consistent with the market indicators), and is 15% higher than the 1.05% needed nationally to deliver 250,000 dwellings each year.

**d) Have employment trends been taken into account? If so, how, and what conclusions are drawn in this regard?**

44. Yes. At the time of the Original SHMA, the latest East of England Forecasting Model (EEFM) 2015-based forecast identified that total employment across the housing market area would see growth from 103,700 jobs in 2011 to 115,000 in 2031. Taking account of unemployment, commuting and double jobbing, the Original SHMA concluded that the demographic projections would provide a surplus of 2,700 workers



based on the increase in jobs that was forecast at that time (HOU4, paragraphs 3.27 to 3.36, pp.37-39).

45. More recent EEFM forecasts have now been published. The latest figures identify an overall increase of 14,100 jobs (which is higher than the previous forecast); but after taking account of double jobbing, this jobs growth represents an increase of 12,900 workplace employed people. The latest EEFM model also identified demand for 18,600 dwellings (which is lower than identified by the SHMA).
46. The demographic projections prepared for the SHMA Update included projections for the economically active population, and this identified an increase of 12,200 economically active persons over the 20-year period 2011-2031. In addition, the number of unemployment benefit claimants recorded by DWP reduced by around 2,200 over the period March 2011 to March 2017, which also increases the number of available workers. Taken together, these figures suggest that the number of available workers will increase by around 14,400 over the 20-year period 2011-31. However, there are a number of factors which should be considered when relating jobs to workers, particularly the issue of commuting:
- Out-commuting: Based on 2011 Census commuting flows, 61.7% of working residents in Stevenage and North Hertfordshire are also employed in the local area. Therefore, of the additional 12,200 workers projected to live in the area and the 2,200 unemployed people that have returned to work during the period, we would expect 8,900 (61.7%) would work locally and 5,500 (38.3%) would commute outside of the area.
  - In-commuting: at the time of the 2011 Census, 31.7% of jobs in Stevenage and North Hertfordshire were filled by people travelling in from other authorities. Therefore, an increase of 12,900 workplace employed people is likely to draw in 4,100 (31.7%) additional in-commuters; leaving a need for workers 8,800 extra workers living in the area. There is therefore assumed to be an increase in net out-commuting of 1,400 workers.
47. When these factors are properly considered, the analysis for the SHMA Update concluded that the demographic projections would provide 8,900 extra workers locally whereas 8,800 extra workers would be needed. There was therefore a small surplus of 100 workers based on the latest jobs forecast, which meant that there was no justification for any uplift to the housing number to align future jobs and workers.

**e) Does the OAN provide enough new homes to cater for those taking up the new jobs expected over the plan period?**

48. Yes, it is clear that the evidence about future jobs is consistent with the evidence about likely future workers across the Stevenage and North Hertfordshire HMA and both the future jobs forecast and the projected number of workers are in balance. The Council's Matter 13 statement addresses employment matters.

**f) Overall, has the OAN figure been arrived at on the basis of a robust methodology?**

49. Yes, the evidence base for OAN needs reflects national policy and guidance.

50. The SHMA and associated papers prepared by ORS identify the OAN for market and affordable housing in the housing market area, consistent with paragraph 47 of the Framework. The identified OAN meets household and population projections (taking full account of migration and demographic change), addresses the need for all types of housing and caters for housing demand, consistent with paragraph 159 of the Framework.

51. The approach used to establish the OAN follows the standard methodology set out in the PPG<sup>6</sup>. The assessment is thorough but proportionate and the findings have been transparently prepared, building on existing information sources outlined within the guidance.

52. This issue was also considered within the HMA by the Inspector for the Stevenage Local Plan who concluded at paragraph 37 that:

*37. 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 (ED16, pp.8-9).*

**The housing requirement set out in Policy SP8**

**3.4 Policy SP8 says that between 2011 and 2031 the Council will release sufficient land to deliver at least 14,000 new homes for North Hertfordshire's own needs, and will provide additional land within the Luton HMA for a further 1,950 homes as a contribution towards the unmet needs for housing arising in Luton. This amounts to a housing requirement of 15,950.**

**(a) Are these intended to be net figures?**

53. Yes.

**(b) Will the housing requirement ensure that the need for affordable housing will be met?**

54. Yes. The housing requirement will meet the objectively assessed need for affordable housing in North Hertfordshire. This matter is addressed in the Council's response to Matter 8 which should be referred to for more detail, particularly the answers to Issues 8.1 to 8.3 inclusive.

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<sup>6</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> [ID 2a]

55. The Inspector's report into the Luton plan identifies that there could be a significant shortfall in the delivery of affordable housing within Luton against the identified need (ED4, paragraph 184, p.37). Providing a further 1,950 homes to help address the unmet housing requirements arising from Luton will make a positive contribution to this need.

## **Appendix A: Benchmarking the Response to Market Signals**

The table below considers the OAN informing all Local Plans prepared by LPAs across the Wider South East (i.e. the former East of England and South East Government Office Regions) which have been adopted in the last 2 years. We have also included evidence on the OAN informing Local Plans that are currently under examination where the Inspector's final report or an interim view has been published.

A summary of the household projection-based estimate of housing need, the final OAN and the percentage uplift is provided in the schedule overleaf, together with any further relevant details of the approach taken in each area. Note that these figures relate to the housing need rather than the final housing target included in each Plan (which is sometimes higher and sometimes lower than the identified housing need).

The schedule also provides a summary of each of the market signals indicators that are identified by PPG based on information published for 2016, with the exception of overcrowding which has a base date of 2011. Cells highlighted in blue represent market indicators that are better than the equivalent indicator for North Hertfordshire, whereas cells highlighted in orange represent indicators that are worse:

- Lower quartile house price and lower quartile affordability based on data published by ONS;
- Average private rent based on data published by VOA;
- Overcrowding based on Census 2011 data;
- Rate of housing delivery 2006-2016 based on data published by CLG.

Across the Wider South East, uplifts applied to the household projection-based estimates of housing need range from 0% up to 138%. The highest proportionate uplifts are all associated with aligning jobs and workers, with the lowest such uplift being 29%.

Local Planning Authority	Housing Need			Notes	Market Signals Indicators				
	Household projection-based estimate (dpa)	OAN (dpa)	Overall uplift		Lower quartile house price	Lower quartile affordability	Average market rent	Overcrowding	Rate of delivery 2006-16
North Hertfordshire	624	690	10%		238,000	10.69	924	5.8%	7.3%
<b>OAN based on household projection without any uplift</b>									
Maldon	260	260 (310)	0% (19%)	Although the OAN did not include any uplift, the housing target was increased from 260 to 310 dpa (an uplift of 19%) to align with the planned target for additional jobs and allow for extra migration in future from London	225,000	11.38	802	3.5%	5.8%
Maidstone	883	883	0%	LPA had proposed a 5% uplift but this was removed by the Inspector given that the household projection-based housing need already represented such a large uplift in housing supply	196,000	9.95	816	6.7%	11.1%
Swale	776	776	0%		167,500	8.38	704	6.1%	10.4%
<b>OAN based on household projection with an adjustment for suppressed household formation</b>									
Lewes	460	520	13%		236,000	11.66	1,005	5.9%	6.6%
Crawley	614	675	10%		220,000	9.52	961	9.8%	8.2%
Basingstoke & Deane	813	850	5%		220,000	9.56	936	5.5%	11.0%
Arun	889	919	3%		200,000	11.69	779	6.7%	7.9%
Horsham	628	650	4%	In both areas, the Inspector concluded that no specific adjustment was needed for market signals, but based the OAN on a household projection that included an adjustment for suppressed household formation	278,000	14.45	1,065	5.3%	10.2%
Great Yarmouth	-	420	-		115,000	5.79	536	6.0%	6.4%
<b>OAN based on a specific uplift to the household projection-based estimate of housing need</b>									
Mid Sussex	730	876	20%	LPA proposed to only uplift in response to suppressed household formation but the Inspector concluded that a further uplift was justified and his interim views recommended an uplift of 20%	260,250	13.17	1,047	5.6%	10.5%
Luton	738	890	20%	Uplift proposed by ORS due to market indicators identifying acute overcrowding and homelessness pressures, despite the	170,000	8.48	788	15.4%	4.8%

Matter 3, North Hertfordshire District Council

Local Planning Authority	Housing Need			Notes	Market Signals Indicators				
	Household projection-based estimate (dpa)	OAN (dpa)	Overall uplift		Lower quartile house price	Lower quartile affordability	Average market rent	Over-crowding	Rate of delivery 2006-16
				area being more affordable					
<b>OAN based on a specific uplift to the household projection-based estimate of housing need (continued)</b>									
Brighton & Hove	1,373	1,506	10%		244,000	11.51	1,295	17.1%	4.4%
Eastleigh	549	604	10%	The Plan wasn't found sound, but the Inspector's report concluded that an uplift of 10% would have been appropriate	210,000	10.18	834	5.0%	9.0%
South Cambridgeshire	879	967	10%	This is the uplift proposed based on additional work that was requested by the Inspector, but no further views have been given about whether or not the OAN has now been accepted	262,000	11.03	932	3.9%	13.6%
<b>OAN based on an uplift to align jobs and workers with no further uplift for market signals</b>									
Vale of White Horse	432	1,028	138%	The Inspector discussed whether or not the jobs number was realistic, but concluded that it provided a reasonable basis for aligning workers despite it yielding a number that was substantially higher than the household projection-based estimate of housing need	255,000	10.08	1,019	4.9%	10.9%
Cambridge	503	700	39%	A market signals uplift of 30% was proposed based on additional work that was requested by the Inspector, but as this yielded a number that was lower than the jobs based figure it was the jobs number that was taken as the OAN without any further uplift for market signals. No further views have been given by the Inspector about whether or not the OAN has now been accepted	320,000	13.32	1,118	14.1%	13.7%
Test Valley	450	588	31%	No specific market signals uplift proposed, but consider jobs uplift would provide sufficient response	215,000	10.30	975	4.0%	11.4%
Canterbury	620	800	29%	Market signals uplift of more than 10% proposed and tested at 20%, but Inspector did not consider it appropriate to apply a market signals uplift cumulative to the jobs uplift	210,000	11.10	968	7.6%	9.3%

## Appendix B: Rates of growth necessary to meet the housing need based on household projections together with the uplifts applied for market signals and aligning jobs and workers

