

Technical Review of the Objectively Assessed Need for Housing in New Forest

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Turley

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Executive Summary

1. On behalf of a forum of developers¹, this report provides a review and technical critique of the objective assessment of housing need (OAN) jointly produced by New Forest District Council ('the District Council') and the New Forest National Park Authority ('the NPA'), which was published in October 2017.
2. The evidence prepared by the District Council and the NPA concludes with an OAN for 584 dwellings per annum for a study area which extends to include the National Park in its entirety. This is geographically larger than New Forest district, although all of the housing needed in the study area appears to be captured within the district boundary with the conclusion reached that the district has a slightly higher need for 585 dwellings per annum. The disaggregation of the OAN concluded for the study area and its component parts is summarised in the following table.

Table 1: Published OAN for New Forest District, NPA and Study Area (dwellings per annum 2016 – 2036)

	New Forest district	New Forest district outside NP	National Park total	Study area total
2014-based projections – the ' <i>starting point</i> '	712	–	–	–
10 year demographic trend-based projection	509	453	55	508
Responding to market signals (+15%)	585	521	63	584
Objectively assessed need	585	521	63	584
Adjustment from ' <i>starting point</i> '	-18%	–	–	–

Source: JG Consulting, 2017

3. The most recent evidence published by the District Council and NPA therefore notably implies a reduction in housing need across New Forest, when compared with the earlier conclusions of the 2014 Strategic Housing Market Assessment (SHMA). On the basis of a review of and appreciation of the underlying housing market situation and available informing data, such a reduction is not considered to be justified. The conclusion is reached that this downgrading of the calculated need has resulted from the application of an alternative methodology which is considered to underestimate the full need for housing across the study area and is not considered to be compliant with applicable national guidance. Areas of specific concern with regards to the robustness of the methodology are summarised below:

- **The use of an unjustified and unnecessary approach to projecting population change**, which contrasts with recognised methodological approaches that more

¹ Trustees of the Barker Mill Estates and Pennyfarthing Homes

closely align with those applied in the development of official projections. The result is an implied level of population growth which is substantially lower than suggested by the official projections developed by the Office for National Statistics (ONS). While there is agreed to be merit in sensitivity testing this '*starting point*', there is evidence that the application of a more sophisticated and robust projection methodology – based on similar principles to overcome issues regarding the representativeness of more recent demographic data in New Forest – would generate a need for approximately 711 dwellings per annum in the district. This level of projected need based on demographic factors alone almost precisely aligns with the need for 712 dwellings per annum currently implied for this geography by the 2014-based household projections. This clearly undermines the stated justification for the reduction in the '*starting point*' for the district by some 29%;

- **The failure to give sufficient consideration to likely future job growth,** principally due to the uncertainty of employment forecasts. The study does not adequately justify that exceptional circumstances apply in the study area which necessitate departure from the requirement to consider the impact of likely job growth on housing need under the applicable guidance. Such an approach merely risks failing to provide the housing needed to support the forecast continuation of recent job growth in this area, and would also appear to threaten the realisation of the District Council's Economic Development Strategy. This will fail to provide the integrated housing and employment strategies required by the National Planning Policy Framework (NPPF); and
 - **An unjustifiably modest upward adjustment to respond to evidence of worsening market signals,** arising from an increasing imbalance between housing supply and demand. The 15% uplift applied within the evidence base is identified as falling towards the lower end of that which could be considered reasonable, particularly in the context of the other challenges noted above. A continued recent worsening in the relationship between house prices and earnings would suggest that an uplift of closer to 20% can be justified by the logic of the OAN report itself, and – particularly when applied to a representative demographic projection – would be inherently more likely to provide the additional housing needed to improve affordability within the study area.
4. The above clearly challenge the extent to which the claimed OAN is representative of future housing needs across the study area. There is therefore evidence that there is a need for more than 584 dwellings per annum across the study area, to accommodate a continuation of historic demographic trends, support the local economy and appropriately respond to market signals.
 5. In turn, the evidence therefore indicates that the full need for housing in the study area has been underestimated by the supporting evidence base. This forms an important context for considering the extent to which the respective Local Plans of the District Council and NPA are adequately providing for housing needs across the study area.

6. The submission version of the District Council's Local Plan, which covers those parts of the study area which fall outside of the National Park and is currently subject to consultation until 12 August 2018, outlines an intention to provide for only around 10,500 additional homes over the plan period (2016 – 2036). This equates to an average of 525 dwellings per annum.
7. On the basis of the submitted version of its own plan, which was submitted for Examination in May 2018, the NPA would make only a modest further contribution to providing for housing need in the study area, with proposals to deliver an average of 40 dwellings per annum over the same period (2016 – 2036).
8. Collectively, the District Council and NPA are therefore intending to provide only 565 dwellings per annum across the study area. This would result in a minimum unmet need of circa 400 dwellings per annum against even the claimed OAN in the latest evidence, which itself is highly likely to be larger than acknowledged to date as a result of the points of critique set out above.
9. The consequences of failing to provide for needs in full will, on the basis of the current iterations of the emerging Local Plans, be compounded early in the plan period by the District Council's proposals to phase housing delivery and provide an average of only 340 homes annually over the first decade of the plan period, and only 230 dwellings per annum in the first five years. This would only modestly increase the recent supply of housing over the short-term, and risks failing to address worsening housing affordability. A comparable stepped approach has elsewhere been recently found to conflict with the Government's aims of boosting the supply of housing².
10. This critique has recognised that the transitional arrangements presented in the revised NPPF mean that the soundness of each Local Plan will be tested against the previous NPPF and Planning Practice Guidance (PPG). This reflects a position whereby the NPA has submitted its Local Plan and the District Council intends to submit prior to the implementation of reforms. It is, however, acknowledged that the examination of both Local Plans will be conducted in the context of the NPPF's introduction of a new standard method for calculating housing need. The Government's published indicative outputs of this methodology indicate a substantially higher need for 965 dwellings per annum in New Forest district. While there are acknowledged difficulties in adhering to this method below authority level – and therefore in National Parks – there exist practical mechanisms through which this figure can be disaggregated to those parts of the district that fall within and outside of the National Park. It is not therefore reasonable to suggest that this method cannot in future be practically applied in New Forest, as is insinuated in the authorities' evidence. The geographies therein are not so complex as to justify departure from the standard method for the purposes of future Local Plan reviews.

² The Inspector examining the Guildford Local Plan reported on this issue in June 2018

1. Introduction

- 1.1 New Forest District Council ('the District Council') has published the submission version of its Local Plan³ for consultation, which runs until 12 August 2018. On behalf of a forum of developers⁴, this report provides a review and technical critique of the objective assessment of housing need (OAN) which forms the evidential basis of proposed policies relating to housing provision. **This technical report is intended to inform wider representations submitted by those members of the forum listed in relation to specific policies, and should therefore be read alongside and not in isolation of these submissions.**
- 1.2 The OAN evidence has been jointly produced by the District Council and the New Forest National Park Authority ('the NPA'), with the latest assessment published in October 2017⁵. This updated the conclusions of the New Forest Strategic Housing Market Assessment⁶ (SHMA), which was jointly produced in September 2014.
- 1.3 The OAN evidence across New Forest has been prepared in the context of policy and guidance in place at the time, in the form of the National Planning Policy Framework⁷ (NPPF) and accompanying Planning Practice Guidance (PPG). While the Government has since revised the NPPF⁸ and is currently implementing a new standard method for calculating housing need, the District Council intends to submit the Local Plan for Examination during the transition period before this revised approach is applied. The implications of this emerging guidance are nonetheless considered by way of context within this report.
- 1.4 Although the latest OAN evidence published for New Forest asserts its compliance with the policy and guidance against which its soundness will be assessed, the forum has a number of concerns and reservations about the approach taken. These concerns were raised by the Trustees of the Barker Mill Estates within a letter to the District Council in February 2018 (**Appendix 1**) but have not been addressed.

Report Structure

- 1.5 The remainder of this report is structured as follows:
- **Section 2 – Summary of the Evidenced OAN Position** – a summary of the published OAN evidence, in the context of relevant national guidance;

³ New Forest District Council (2018) Local Plan Review 2016-2036 Part One: Planning Strategy, Submission Document for Regulation 19 Public Consultation

⁴ Trustees of the Barker Mill Estates and Pennyfarthing Homes

⁵ JG Consulting (2017) New Forest District Council and the New Forest National Park Authority: Objectively Assessed Housing Need (OAN) – Final Report

⁶ GL Hearn (2014) New Forest Strategic Housing Market Assessment

⁷ DCLG (2012) National Planning Policy Framework

⁸ MHCLG (2018) National Planning Policy Framework

- **Section 3 – Critique in the Context of the Relevant PPG** – the concluded OAN is critiqued in the context of the relevant PPG, against which its soundness will be tested through forthcoming Local Plan Examinations;
- **Section 4 – Future Application of the Proposed Standard Method** – reflecting direct references in the published evidence base, this section considers the potential future implications of the proposed standard method for calculating housing need across New Forest;
- **Section 5 – Emerging Policy Response** – the interpretation of the evidence into housing requirements proposed by the District Council and NPA is summarised, with consideration given to the implications of proposed phasing and the resultant scale of unmet housing need; and
- **Section 6 – Conclusions** – a concise summary of the findings and implications of this technical review.

2. Summary of the Evidenced OAN Position

- 2.1 This section introduces the OAN evidence commissioned by the District Council and the NPA, within the context of national policy and guidance. Comparison is made with the earliest iteration of the OAN evidence, as well as the indicative outcome of the Government's proposals to introduce a new standard method for calculating housing need.

National Policy and Guidance

- 2.2 Local authorities must positively prepare Local Plans in compliance with national planning policy and guidance. The policies in the previous NPPF and associated PPG apply for the purposes of examining Local Plans submitted on or before 24 January 2019, as confirmed by the transition arrangements set out in the revised NPPF⁹.
- 2.3 With the NPA having already submitted its Local Plan for examination and the District Council intending to do so prior to this date, this section therefore focuses on the statutory requirements set out in the previous NPPF and PPG for the purposes of establishing a robust and justified assessment of housing need.
- 2.4 Under the previous NPPF, authorities are required to fully meet the objectively assessed need for housing in their housing market area¹⁰. The role of the SHMA was established, which should be prepared to objectively assess the full need for housing¹¹. The relevant PPG strongly recommends the use of a stepped methodology when assessing housing needs, which – though open to interpretation in places, as acknowledged by Government¹² – has been broadly followed by Inspectors in establishing reasonable conclusions on the OAN for housing. This involves:
- Using the latest official household projections as the '*starting point*'¹³;
 - Applying adjustments to the '*starting point*' where necessary to determine the demographic need for housing¹⁴;
 - Taking employment trends into account¹⁵;
 - Responding to market signals of imbalance between housing supply and demand¹⁶; and
 - Taking affordable housing need into account¹⁷.

⁹ MHCLG (2018) National Planning Policy Framework, Annex 1

¹⁰ DCLG (2012) National Planning Policy Framework, paragraph 47

¹¹ *Ibid*, paragraph 159

¹² DCLG (2017) Planning for the right homes in the right places: consultation proposals, paragraph 11

¹³ PPG Reference ID 2a-005-20140306

¹⁴ PPG Reference ID 2a-017-20140306

¹⁵ PPG Reference ID 2a-018-20140306

¹⁶ PPG Reference ID 2a-019-20140306

Latest Published OAN Evidence

- 2.5 The latest OAN evidence for New Forest¹⁸ was published in October 2017. It confirms that its conclusions are derived from the application of the existing PPG methodology, introduced above.
- 2.6 In accordance with the PPG, the official 2014-based household projections form the '*starting point*' for the assessment. These projections are only released for the geographic area of New Forest district, which includes those parts of the district that are both within and outside of the National Park.
- 2.7 The report proceeds to raise '*significant doubts about the validity*' of the future population growth and migration assumptions underpinning the 2014-based household projections¹⁹. It seeks to address a perceived '*disconnect between past trends and the future projection*'²⁰ by attributing greater weight to an alternative projection based on the absolute average growth in population annually recorded over a longer-term period of ten years (2006 – 2016). This therefore projects forward on the basis of a continuation of historic counts of population change.
- 2.8 Although the PPG emphasises the importance of aligning housing need with likely job growth, the report claims that '*such an approach [is] not appropriate*'²¹ in New Forest, instead seeking to determine whether its adjusted demographic projection may act as a barrier to future economic growth. The modelling presented in the report indicates that older age cohorts will grow the labour supply of New Forest over the period assessed, offsetting the impact of a projected decline in the working age population. This leads to the conclusion that no economic adjustment to the OAN is required.
- 2.9 Market signals are subsequently reviewed, concluding that housing provision should be increased to reflect notable affordability pressures in New Forest. Based on a review of market signals adjustments applied in other areas, the report concludes that a 15% uplift to its demographic projection is appropriate and justified.
- 2.10 Based on the application of the above adjustments, a total and disaggregated OAN is presented for the whole study area, which includes the National Park – extending to cover parts of adjacent Test Valley and Wiltshire – and those parts of New Forest district which fall outside of the National Park. An aggregate position is also presented for New Forest district, which is slightly smaller than the study area but appears to fully capture the housing need calculated therein²². Table 2.1 overleaf illustrates the adjustments applied to the '*starting point*' in arriving at the OAN.

¹⁷ PPG Reference ID 2a-029-20140306

¹⁸ JG Consulting (2017) New Forest District Council and the New Forest National Park Authority: Objectively Assessed Housing Need (OAN) – Final Report

¹⁹ JG Consulting (2017) New Forest District Council and the New Forest National Park Authority: Objectively Assessed Housing Need (OAN) – Final Report, p29

²⁰ *Ibid*, paragraph 2.22

²¹ *Ibid*, p41

²² A marginally negative housing need (-1dpa) is calculated for those parts of the study area which fall outside of New Forest district, which indicates that housing need in the study area is fractionally lower than housing need in the district despite the former covering a slightly larger geographic area

Table 2.1: Published OAN for New Forest District, NPA and Study Area (dwellings per annum 2016 – 2036)

	New Forest district	New Forest district outside NP	National Park total	Study area total
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10 year demographic trend-based projection	509	453	55	508
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Objectively assessed need	585	521	63	584
Adjustment from ‘starting point’	-18%	–	–	–

Source: JG Consulting, 2017

- 2.11 While an official ‘starting point’ is not universally available for all of the areas assessed in the OAN report, it is evident that the concluded OAN for New Forest district – which almost precisely aligns with that concluded for the study area – is some 18% lower than suggested by the 2014-based projection. This largely results from the demographic adjustment applied, which substitutes the official sub-national population projection (SNPP) with an alternatively calculated longer-term trend-based scenario that projects a notably lower level of population growth. This reduces the ‘starting point’ by 29%.

Comparisons with the 2014 SHMA

- 2.12 The OAN report published in October 2017 updates the 2014 SHMA²³, which similarly established an OAN for the same spatial areas by drawing upon evidence available at that time. It included references to the PPG, which was released in its final form around six months before the publication of the SHMA in September 2014.
- 2.13 The SHMA concluded that there was an OAN for between 727 and 851 dwellings per annum across the study area. This is evidently higher than the need for 584 dwellings per annum concluded in the 2017 report, albeit it is calculated over a slightly different period (2011 – 2031, rather than 2016 – 2036). The OAN in the National Park in particular has been reduced by more than half, as illustrated in the table below.

²³ GL Hearn (2014) New Forest Strategic Housing Market Assessment

Table 2.2: Change in Published OAN for Study Area (dwellings per annum)

	2014 SHMA	2017 OAN	Reduction	% reduction
New Forest district outside NP	587 – 687	521	66 – 166	11 – 24%
National Park total	140 – 164	63	77 – 101	55 – 62%
Study area	727 – 851	584	143 – 267	20 – 31%

Source: GL Hearn; JG Consulting

- 2.14 In understanding how such a lowering of need is suggested as being justified, it is important to compare the assumptions and inputs made to the individual steps of the PPG methodology.
- 2.15 This reveals that the scale of difference largely results from the decision in the 2017 OAN report to significantly deviate from the population growth trajectory implied by official population projections, detailed earlier in this section. The 2014 SHMA, in contrast, viewed the then-latest interim 2011-based projections as *‘broadly reasonable in the context of regional and national comparisons’*²⁴. It did, however, adjust to take account of the latest migration and demographic information, including the historic overestimation of population change in New Forest between Census years. This reduced the population growth projected by the then-latest interim 2011-based projections – which had been extrapolated to 2031 – by circa 18%.
- 2.16 Outside of this significant factor, it is important to note that in concluding that as many as 851 dwellings per annum may be needed across the study area, the 2014 SHMA considered it reasonable to apply a larger adjustment in response to an evidenced worsening of affordability and market signals. This upper end of the range (851dpa) is expressed as an *‘upward adjustment to housing provision to respond to market signals and evidence of suppressed housing formation in the New Forest area’*.
- 2.17 The SHMA considered household formation rates in some detail, assessing the merits of applying the then-latest 2011-based rates – which were commonly found to have been adversely influenced by the recession – or the preceding 2008-based rates, which were inherently more optimistic by projecting forward the more positive trends recorded before the recession. A midpoint between the two was favoured, with this forming the basis for the lower end of the OAN range (727dpa) concluded for the study area.
- 2.18 The upper end of the range adopted a more positive approach, however, suggesting that this could be justified as representative of full housing needs. It is noted that the SHMA is unclear in specifying how the upper end of its range was precisely calculated, with no indication as to whether this resulted from a proportionate uplift or was directly derived from the modelling.
- 2.19 Finally, in considering the breakdown of need – and aside from the more modest reduction applied to the district-wide projection – the other factor contributing to the

²⁴ *Ibid*, paragraph 5.6

lowering of the projection of need for the NPA specifically is a change in the approach taken to establish need at the sub-authority level. The 2017 report proposes a '*different methodology*' to the previous SHMA, preferring an approach which extrapolates change in historic population counts both across the study area and in sub-areas, such as the National Park. This represents a more "bottom-up" method than the previous approach, which disaggregated *projected* population growth to sub-areas on a pro-rata basis. The 2017 OAN report acknowledges that this change in methodological approach has '*a notable impact on sub-area projections*'²⁵.

Comparison with the proposed standard method

- 2.20 The introduction of a new standard method for calculating housing needs through the revised NPPF was one of the '*radical reforms*' proposed by Government in response to the national housing crisis. This was aimed at minimising delays in plan-making and ensuring that local authorities cannot '*duck potentially difficult decisions*' by advancing an alternative methodology²⁶.
- 2.21 The Government first published its proposed method for consultation in September 2017²⁷, and it was retained unchanged during consultation on the revised NPPF which closed on 10 May 2018²⁸. The subsequent publication of the revised NPPF in its final form on 24 July 2018 confirms that a '*local housing need assessment conducted using the standard method*' should be used to '*determine the minimum number of homes needed*' following the transition period, unless '*exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals*'²⁹. It also requires '*any needs that cannot be met within neighbouring areas*' to be taken into account³⁰.
- 2.22 Alongside the revised NPPF, the PPG has been partially updated to reference the method originally proposed by Government. This uses the latest official household projections as the '*baseline*', and formulaically adjusts this figure to take account of the relationship between median house prices and earnings. The overall scale of adjustment is capped at 40% above recently adopted housing requirements, or household projections if higher than requirements adopted more than five years ago.
- 2.23 '*Full guidance*' on local housing need assessments has yet to be issued at the time of writing³¹. However, the Government has previously expressed an intention to make clear through guidance that:

"Any deviation [from the standard method] which results in a lower housing need figure...will be subject to the tests of soundness and will be tested thoroughly by the Planning Inspectorate at examination. The plan-making authority will need to make

²⁵ JG Consulting (2017) New Forest District Council and the New Forest National Park Authority: Objectively Assessed Housing Need (OAN) – Final Report, paragraph 28

²⁶ DCLG (2017) Fixing our Broken Housing Market – the housing white paper, paragraph 14

²⁷ DCLG (2017) Planning for the right homes in the right places: consultation proposals

²⁸ MHCLG (2018) National Planning Policy Framework: draft text for consultation

²⁹ MHCLG (2018) National Planning Policy Framework, paragraph 60

³⁰ *Ibid*, paragraph 60

³¹ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

sure that the evidence base is robust and based on realistic assumptions, and that they have clearly set out how they have demonstrated joint working with other plan-making authorities. In such circumstances, the Planning Inspector will take the number from the standard method as a reference point in considering the alternative method”³²

- 2.24 It also recognised that ‘available data does not allow local housing needs to be calculated using the standard method’ within those plan-making authorities which ‘do not align with local authority boundaries, such as National Parks’³³. In these circumstances, it suggested that:

“Such authorities may continue to identify a housing need figure locally, but in doing so have regard to the best available information on anticipated changes in households as well as local affordability levels”³⁴

- 2.25 These proposals are yet to be reflected in the PPG, and indeed the method itself also remains subject to change on the basis that:

“The Government is aware that lower than previously forecast population projections have an impact on the outputs associated with the method. Specifically it is noted that the revised projections are likely to result in the minimum need numbers generated being subject to a significant reduction, once the relevant household projection figures are released in September”³⁵

- 2.26 The Government has recognised that this prospective reduction conflicts with its objective of building more homes, established as the catalyst for reforms in the Housing White Paper. It has therefore confirmed that:

“In order to ensure that the outputs associated with the method are consistent with this, we will consider adjusting the method after the household projections are released in September. We will consult on the specific details of any change at that time. It should be noted that the intention is to consider adjusting the method to ensure that the starting point in the plan-making process is consistent in aggregate with the proposals in Planning for the right homes in the right places consultation and continues to be consistent with ensuring that 300,000 homes are built per year by the mid 2020’s”³⁶

- 2.27 Whilst there remains a degree of uncertainty as to the final form of the standard method, the revised NPPF has confirmed that this will be used to set minimum housing need through future Local Plans beyond January 2019. This creates an inevitable and important context for considering the evidence of housing need in New Forest.
- 2.28 The proposed method is entirely based on official datasets produced by the Office for National Statistics (ONS), with periodic updates to these datasets resulting in a figure

³² MHCLG (2018) Draft Planning Practice Guidance, p26

³³ *Ibid*, p26

³⁴ *Ibid*, p26

³⁵ MHCLG (2018) Government response to the draft revised National Planning Policy Framework consultation: a summary of consultation responses and the Government’s view on the way forward, p26 – 27

³⁶ *Ibid*, p27

which is subject to change. As part of its original consultation in September 2017, the Government released indicative figures – based on data available at that time – to suggest that an annual need for 965 homes was implied by the proposed approach in New Forest district. The subsequent release of new affordability ratios in April 2018 has not changed this figure, and reinforced the need to apply the maximum permissible 40% adjustment for market signals.

- 2.29 As illustrated in the table below, the outcome of the proposed standard method is currently some 65% higher than the OAN established for New Forest district within the latest evidence commissioned by the District Council and the NPA.

Table 2.3: Indicative Outcome of Proposed Standard Method

	New Forest district
Household projections (annual, 2016 – 26)	690
Median affordability ratio (2017)	11.94
Adjustment factor, capped at 40%	50% (capped at 40%)
Indicative housing need based on proposed method	965
2017 OAN for New Forest district	585
Standard method relative to published OAN	+65%

Source: MHCLG; ONS

Summary

- 2.30 The evidence base implies that housing need across New Forest has reduced over recent years. This claimed reduction is primarily the outcome of a decision to fundamentally challenge the methodology used to develop official demographic projections, contrasting with earlier conclusions that the methodology used to develop such projections provides a reasonable basis for calculating housing needs in New Forest. This reduction is not counterbalanced by subsequent adjustments to respond to market signals or support the economy, with only brief consideration of the latter in particular within the evidence base. The extent to which such a suppression in calculated need is reflective of ‘*a meaningful change in the housing situation*’³⁷ in New Forest is considered as part of the critique of the evidence base within this report.
- 2.31 The Government has acknowledged that its existing planning guidance provides an opportunity for alternative methodologies to be advanced which fail to adequately respond to the national housing crisis and allow authorities to avert ‘*difficult decisions*’. Its introduction of a new standard methodology aims to minimise such deviation, by providing a ‘*minimum number*’ to be met in all but exceptional circumstances. In these circumstances, the standard method – which is underpinned by official household projections – is expected to remain as a ‘*reference point*’ in considering alternative methods.

³⁷ PPG Reference ID 2a-016-20150227

- 2.32 It is acknowledged Local Plans in New Forest will have been submitted for Examination during a period of transition which precedes the implementation of the new method, the precise form of which remains subject to change. However, it is notable that the methodology proposed to date by Government implies a substantially higher need for housing across New Forest district than suggested within the authorities' evidence base.
- 2.33 The stated justification for this lower level of housing need is further critiqued within the following section, which also considers the implications of the latest available evidence in understanding the housing need pressures facing the area. These conclusions are of relevance to the OAN concluded across the study area, and by implication each of its component parts.

3. Critique in the Context of the Relevant PPG

- 3.1 As introduced in the previous section, the OAN evidence drawn upon by the District Council and the NPA employs a methodology which is considered likely to underestimate the full need for housing across its study area. This is considered to result from:
- Its selected demographic projection, which is substantially lower than the ‘starting point’ of the official projections;
 - Its failure to give sufficient consideration to likely future job growth; and
 - Its inadequate response to market signals of imbalance between housing supply and demand.
- 3.2 This section provides a technical critique of the approach taken to respond to the above stages of the PPG methodology.

An Appropriate Demographic Projection

- 3.3 The PPG describes the official household projections as ‘*statistically robust*’, but confirms that ‘*sensitivity testing*’ may be considered based on ‘*alternative assumptions in relation to the underlying demographic projections and household formation rates*’³⁸. It makes clear, however, that ‘*any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence*’³⁹.
- 3.4 As highlighted in the previous section, the departure from the official 2014-based household projections within the 2017 OAN report results in a 29% reduction from the ‘starting point’ prescribed through the PPG across New Forest district. The report considers that such an adjustment is necessary because the projection implies an acceleration in the rate of population growth when compared to past trends, driven by higher levels of net migration to the district.
- 3.5 In isolation, these circumstances are not considered to justify such a fundamental departure from the official projections, with a lack of the ‘*robust evidence*’ required to justify and explain this decision. Indeed, there is an absence of evidence or consideration of the factors influencing the past trends observed in New Forest, or the factors which could be expected to influence growth in the future. These are considered within this section.

Factors influencing historic demographic trends in New Forest

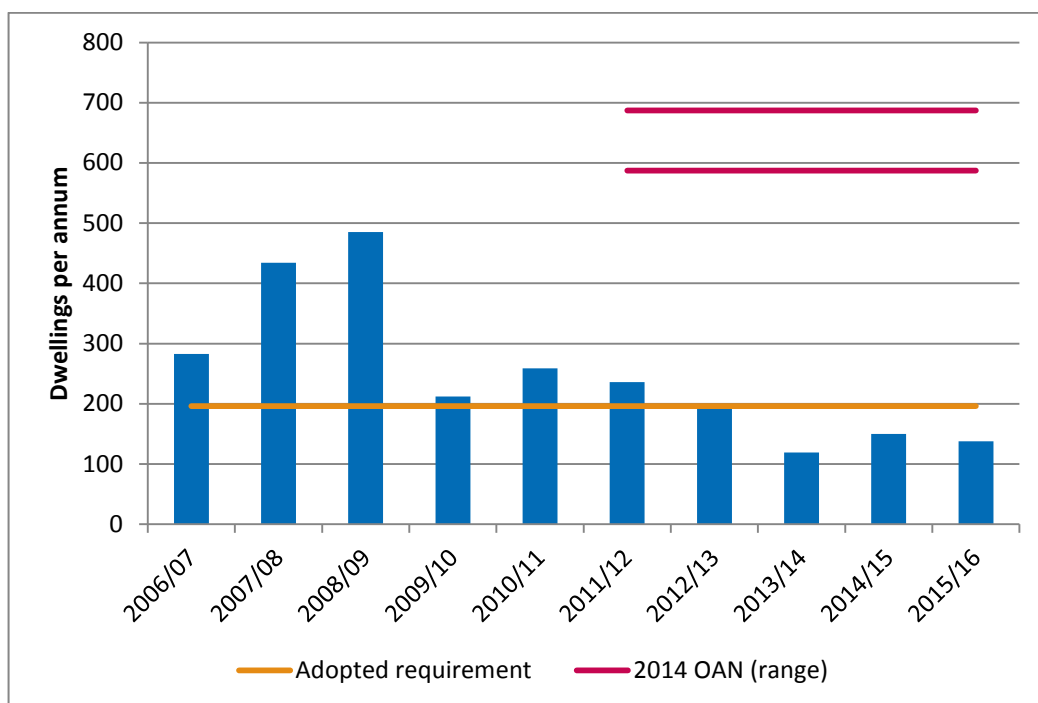
- 3.6 It is apparent that population growth in the district – both within and outside of the National Park – has at least in part been suppressed by a longstanding policy which constrained housing supply. This is reflected, for example, by a regionally-derived housing requirement for the area outside of the National Park which is around a third of even the currently claimed OAN for this geography.

³⁸ PPG Reference ID 2a-017-20140306

³⁹ *Ibid*

- 3.7 Whilst the Government has since abolished regional planning and consistently expressed its objective of significantly boosting housing supply, the rate of development in this area actually slowed further. Between 2011 and 2016, for example, an average of only 167 homes were completed annually outside of the National Park, which is half the rate of development achieved in the preceding five year period⁴⁰ (335dpa; 2006 – 2011). This failed to provide the houses required to meet even its adopted housing target, and falls still further below the need calculated for this period within the 2014 SHMA⁴¹.

Figure 3.1: Housing Completions in New Forest District (excluding National Park)



Source: New Forest District Council, 2017

- 3.8 Reflecting this limited supply of new housing, the population of New Forest grew by only 1.5% over these five years (2011 – 2016), which is the second lowest of the 67 authorities in the South East and only marginally ahead of the lowest, which is the Isle of Wight (1.4%). The population of the wider region has grown at approximately three times this rate (4.4%) over the same period.
- 3.9 This minimal level of growth has the clear potential to influence the ‘starting point’ of the official household projections, as explored below.

Effect on the official projections and justification for sensitivity testing

- 3.10 Although the 2016-based household projections are not yet available at the time of writing, the underlying 2016-based sub-national population projections (SNPP) were released on 24 May 2018 and exclusively draw upon trends within a five year period

⁴⁰ JG Consulting (2017) New Forest District Council and the New Forest National Park Authority: Objectively Assessed Housing Need (OAN) – Final Report, Figure 5.13

⁴¹ The 2017 OAN is not presented, as this has been calculated from 2016 onwards

(2011 – 2016) in which the rate of development in New Forest has been particularly low. The effect on the 2016-based household projections will be known upon their release on 20 September 2018, from which point they will become the new ‘starting point’ for assessing housing needs.

- 3.11 In considering the projected growth in population under this most recent dataset, the implications of the stark reduction in new housing supply over the period from which trends are based and its moderating effect on population growth are demonstrable. The 2016-based SNPP substantially reduce the level of population growth projected in New Forest district over the emerging plan period by some 43%, when compared to the preceding 2014-based SNPP. This projection would grow the overall population by an average of only 0.3% each year, effectively continuing the recently suppressed trend.

Table 3.1: Comparing Official Population Projections for New Forest (2016 – 2036)

	Population change 2016 – 2036	Proportionate change	Average change per annum
2014-based	21,930	12.1%	0.6%
2016-based	12,470	6.9%	0.3%
Variance	-43.1%	(-5.2%)	(-0.3%)

Source: ONS

- 3.12 Such a significant implied reduction in projected population growth should not be accepted uncritically. There is agreed to be justification for sensitivity testing the ‘starting point’ in the context of this recently misrepresentative profile of population change. The PPG highlights that official projections may require adjustment to ‘reflect factors affecting local demography...which are not captured in past trends’, and particularly references the need to ensure that the assessment reflects ‘the consequences of past under delivery of housing’⁴². Sensitivity testing is advocated to interrogate the assumptions made in the underlying demographic projections⁴³, with a number of Local Plan Inspectors giving greater weight on this basis to longer-term trend-based projections⁴⁴.
- 3.13 The development of variant population and household projections is therefore considered to be justified in New Forest, given evidence that the official projections – which base trends on an historic five year period – have the potential to be influenced by a misrepresentative period that is overly skewed by a recent moderation in an already limited rate of development. The OAN report itself recognises that recent delivery has failed to meet the need for housing that was previously concluded in the

⁴² PPG Reference ID 2a-015-20140306

⁴³ PPG Reference ID 2a-017-20140306

⁴⁴ This has been referenced by the Inspectors examining Local Plans in Luton, Telford and Wrekin and Central Lincolnshire, for example

2014 SHMA, with a shortfall of over 1,400 homes since 2011 relative even to the lower end of its range⁴⁵.

- 3.14 There is a longstanding policy of constraint in the district which predates the last five years. However, an extension of the trend period of the type accepted by Inspectors elsewhere would at least capture the modestly higher levels of development seen prior to 2009 (Figure 3.1), which falls outside of the respective trend periods of the 2014-based and 2016-based SNPP. This would begin to counterbalance the more recent trend, which appears misrepresentative.

An appropriate method for sensitivity testing

- 3.15 It is recognised that the authorities' published OAN evidence claims to have undertaken such sensitivity testing, leading to its preference for a variant projection based on ten year trends as opposed to the '*starting point*'.
- 3.16 However, its variant projection appears to simply extrapolate the absolute population change annually recorded in the study area and its component parts over the past ten years. This is considered to be an unnecessarily crude approach, with the report itself acknowledging that it deviates from the methodology typically followed by its author elsewhere⁴⁶. It directly identifies that the selected method produces '*much lower*' outcomes⁴⁷.
- 3.17 The report also recognises that such an approach markedly affects the sub-area projections, which contributes towards the relatively significant change implied in the NPA in particular between the 2014 SHMA and the 2017 update as shown at Table 2.2 of this report. Its preferred approach extrapolates change in historic population counts both district-wide and in sub-areas, such as the National Park. This represents a more "bottom-up" method than previously employed in the 2014 SHMA, which disaggregated *projected* population growth to sub-areas on a pro-rata basis. The revised approach produces a notably different outcome but is inherently less robust, given its departure from a model-based projection of growth which takes greater account of wider demographic factors influencing the population.
- 3.18 The ONS does not adopt such a linear approach in developing official population projections, reflecting the fact that such a method is entirely backward looking and takes no account of the changing size of the population both in local areas and nationally. Instead, the ONS incorporates prevalent fertility and mortality trends, and bases its future migration assumptions on an integrated matrix which takes account of the projected size of the local and wider population and existing residents' tendency to move⁴⁸.
- 3.19 The validity of such an approach in New Forest has been previously tested in the 2014 SHMA, which highlighted an assumption within the then-latest official projections that net migration to New Forest will increase and result in higher levels of population

⁴⁵ JG Consulting (2017) New Forest District Council and the New Forest National Park Authority: Objectively Assessed Housing Need (OAN) – Final Report, paragraph 5.30

⁴⁶ *Ibid*, paragraph 2.22

⁴⁷ *Ibid*, paragraph 5.50

⁴⁸ ONS (May 2016) Information Paper Quality and Methodology Information, p5

growth than recorded historically. In contrast with the 2017 report, the 2014 SHMA concluded that this was a ‘reasonable’ outcome by stating that:

“As the population in New Forest District is expected to grow older over time, and older people are less likely to move home, it is reasonable to expect out-migration to fall. In contrast the population is expected to grow in areas from which people typically move to the District (such as Southampton)”⁴⁹

- 3.20 While it is considered reasonable to draw upon a longer-term historic period when developing trend-based projections for New Forest, this is not considered to justify or indeed necessitate such a fundamental and misrepresentative departure from a statistically robust methodology.
- 3.21 The consequences of drawing upon long-term trends but retaining a comparable methodology to that employed by the ONS can be understood through reference to projections developed by the Greater London Authority (GLA). These projections have been produced for every authority in England, using a methodology designed to align with the ONS approach that has been reviewed by the Centre for Population Change at the University of Southampton. One of the three variant projections produced by the GLA draws upon a ten year historic period (2006 – 2016). While they were produced prior to the release of revised population estimates by the ONS in March 2018, these revisions have had a negligible effect in New Forest, and indeed have slightly elevated the estimated population in the district⁵⁰. This indicates that the integration of revised estimates would not produce a markedly different outcome.
- 3.22 As summarised in the following table, the projections developed by the GLA suggest that a continuation of long-term trends in New Forest would result in a substantially higher level of population growth than implied by the authorities’ evidence base. Approximately 39% more households would be expected to form under such a scenario than assumed in deriving the OAN.

Table 3.2: Comparing Variant Projections in New Forest (2016 – 2036)

	Projected population growth	Projected household formation
GLA 10 year trend	20,542	13,652
Council 10 year trend	11,934	9,824

Source: GLA; JG Consulting

- 3.23 The scale of difference between two scenarios designed to reflect population trends recorded over ten years clearly serves to challenge the robustness of the methodology employed within the District Council’s evidence base. The GLA variant can be reasonably considered to have a greater level of sophistication and robustness, having

⁴⁹ GL Hearn (2014) New Forest Strategic Housing Market Assessment, paragraph 5.40

⁵⁰ The revised estimates indicate that the population of New Forest district was 179,529 in 2016; this is 293 persons higher than the original estimate made by the ONS, albeit this represents a comparably small increase of only 0.2%

been designed to align with the ONS methodology by basing domestic migration on a matrix which does not simply extrapolate historic population counts into the future.

- 3.24 The more robust GLA methodology suggests that 683 households would form each year across New Forest district, based on a continuation of trends recorded over the past ten years. Accommodating these households would require 711 dwellings per annum when replicating the OAN report's allowance for vacancy⁵¹. It is notable that this almost precisely aligns with the need for 712 dwellings per annum implied for this geography by the current '*starting point*' of the 2014-based household projections.
- 3.25 While this '*starting point*' will change and likely reduce upon the release of 2016-based household projections this September, adherence to the existing PPG – required due to planned submission of Local Plans within a period of transition – would require such an inference to be tested. Adjustments would continue to be required where necessary to arrive at a reasonable demographic projection which is not overly influenced by misrepresentative recent trends.
- 3.26 It is acknowledged that both the ONS and GLA produce population and household projections only at local authority level. However, the 2014 SHMA illustrated how such figures can be reasonably disaggregated on a pro-rata basis to produce individual figures for those parts of the district which fall within and outside of the National Park. Obtaining a figure for these geographies clearly does not necessitate such a marked methodological departure of the type advanced in the 2017 OAN report.

Failure to Sufficiently Consider Job Growth

- 3.27 The PPG requires plan makers to '*make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate*', while having regard to the projected growth of the working age population⁵². It makes clear that new housing can help to address problems caused when job growth is higher than projected labour supply, which can reduce the resilience of local businesses and cause unsustainable commuting patterns.
- 3.28 The 2017 OAN report references this guidance, but seeks to advance a position that any upward adjustment to the OAN for New Forest must be reconciled with negative adjustments in other locations⁵³. It cites no precedent for such a view – which conflicts with best practice described by the Planning Advisory Service and directly cited in the report – and indeed there is no mechanism through which this approach could be practically implemented.
- 3.29 Notwithstanding, the report outlines its approach to considering the future relationship between job growth and housing need:

⁵¹ JG Consulting (2017) New Forest District Council and the New Forest National Park Authority: Objectively Assessed Housing Need (OAN) – Final Report, paragraph 2.12. Vacancy allowance of 4.0% has been made based on Council Tax data

⁵² PPG Reference ID 2a-018-20140306

⁵³ JG Consulting (2017) New Forest District Council and the New Forest National Park Authority: Objectively Assessed Housing Need (OAN) – Final Report, paragraphs 3.3 – 3.6

“The approach to the link between homes and jobs in New Forest...is to project what level of labour-supply growth can be expected and then form a view about whether any changes are likely to act as a constraint to economic growth”⁵⁴

- 3.30 This ‘view’ is formed independently of any forecast of future job growth in New Forest, despite the clear guidance of the PPG. The report acknowledges that this deviates from the approach taken by the author elsewhere and wider best practice, and states that this decision was driven by a perception that *‘job forecasts are inherently uncertain’*⁵⁵. Such a broad observation is not locally specific to New Forest, and provides no justification for the claim that it is necessary or appropriate to depart from this stage of the PPG methodology in the specific circumstances of the study area.
- 3.31 A failure to consider future job growth belies the economic potential of the area. Experian is one of the three leading forecasting houses, and their latest release suggests that the district’s economy – both within and outside of the National Park – could grow to support an additional 8,800 jobs over the plan period⁵⁶ (2016 – 2036). This would sustain the relatively strong job growth seen over recent years, with the Business Register and Employment Survey suggesting that approximately 2,800 jobs have been created within this geography over the past five years (2011 – 2016).
- 3.32 The cursory consideration of future job growth within the OAN report also conflicts with the Economic Development Strategy recently produced by the District Council. This clearly states the *‘ambition for a vibrant and growing local economy’*, but acknowledges that the New Forest economy – despite being *‘amongst the largest in Hampshire’* – is limited in its growth by *‘an ageing workforce, an underrepresentation of high value added sectors and a high proportion of unskilled residents’*⁵⁷. It recognises the relationship with housing, noting that:
- “...the unaffordable housing market is stopping young skilled people from entering the local workforce and their ability to drive up the average skill level. This lack of skills and young people entering the New Forest economy is one reason why sluggish business growth has been seen and the mean age of the New Forest continues to rise”⁵⁸*
- 3.33 The concluded OAN would lead to a further contraction in the working age population of New Forest, as confirmed at Figure 3.3 of the 2017 report. It relies on increased levels of economic activity amongst older residents to grow the labour force and support future job growth, without consideration of the type of jobs likely to be created and the likelihood that they will be occupied by older people. The Economic Development Strategy makes clear that the District Council is *‘striving for higher value jobs’* and seeking to *‘create an environment which offers opportunities for young people’*⁵⁹. The extent to which older residents remaining economically active for longer will achieve these objectives is inherently uncertain.

⁵⁴ *Ibid*, paragraph 3.7

⁵⁵ *Ibid*, paragraph 3.8

⁵⁶ Experian (June 2018) Local Market Forecasts Quarterly

⁵⁷ New Forest District Council (2018) New Forest Economic Development Strategy 2018-2023, p1

⁵⁸ *Ibid*, paragraph 2.4

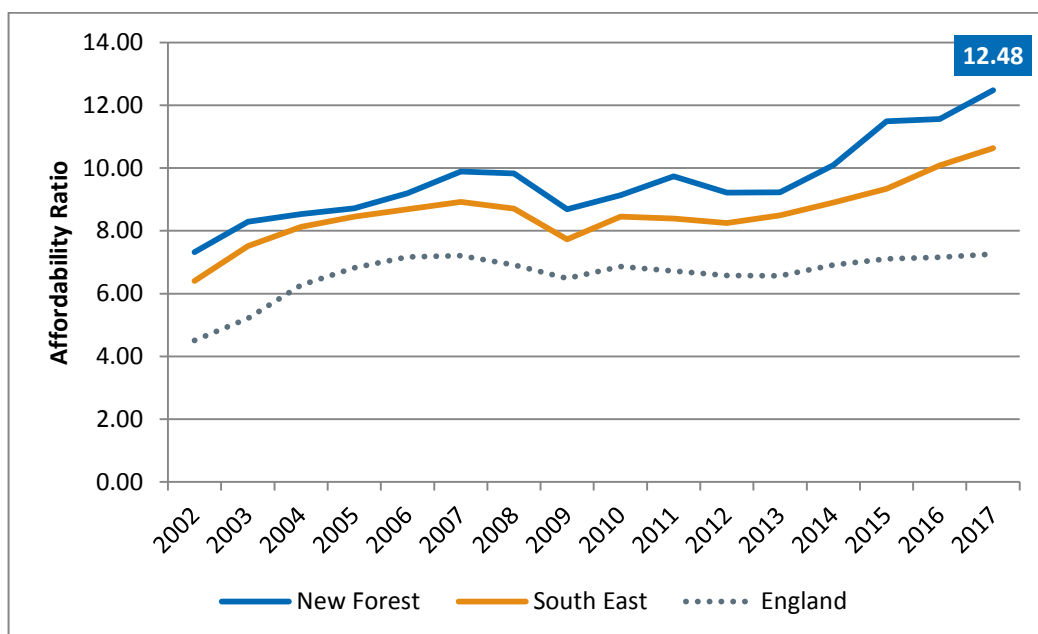
⁵⁹ *Ibid*, p1

- 3.34 The NPPF makes clear the importance of ensuring that strategies for housing and employment are integrated⁶⁰, with the PPG providing guidance – introduced at the start of this section – on how this should be done. The failure to adhere to this guidance clearly risks failing to provide the housing needed to support the New Forest economy.

Reasonably Responding to Market Signals

- 3.35 The OAN report correctly acknowledges the ‘*notable affordability pressures in New Forest*’, which provide ‘*strong evidence that housing provision should be increased*’ in accordance with the PPG⁶¹.
- 3.36 This continues to be supported by recently published market evidence, reflected for example in the latest affordability ratios released by the ONS in April 2018. They confirm that lower quartile house prices in New Forest now equate to over 12 years’ earnings, which would require an individual to save for almost two years longer to access entry-level housing in the district than would have been the case only two years ago⁶². As shown in the following chart, this has continued a recent deterioration in the affordability ratio, which has consistently but increasingly exceeded the regional average. This has notably coincided with the recent reduction in new housing development – shown at Figure 3.1 – which is likely to have been a factor influencing the recent deviation from a relatively stable but imbalanced long-term position.

Figure 3.2: Change in Lower Quartile Affordability Ratio (2002 – 2017)



Source: ONS, 2018

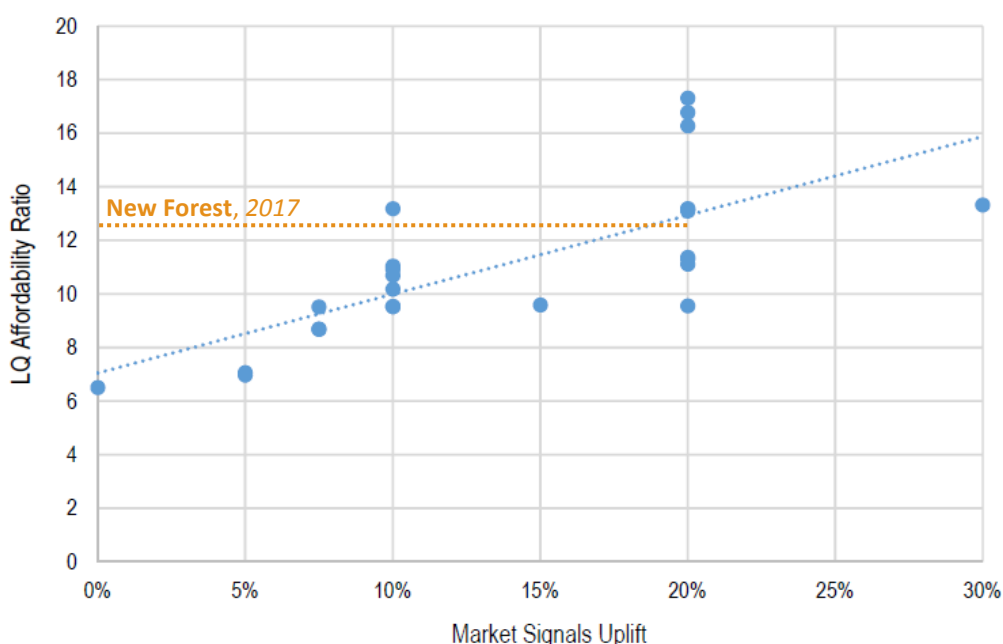
⁶⁰ DCLG (2012) National Planning Policy Framework, paragraph 158

⁶¹ JG Consulting (2017) New Forest District Council and the New Forest National Park Authority: Objectively Assessed Housing Need (OAN) – Final Report, paragraph 5.43

⁶² ONS (2018) House price to workplace-based earnings ratio, 2017. Table 6c: lower quartile

- 3.37 Within this worsening context, the uplift of 15% applied within the 2017 OAN report to respond to market signals appears comparatively modest, and towards the lower end of that which could be considered reasonable in the context of Local Plan Inspectors' views and other evidence. It is these precedents which dictate the scale of adjustment concluded in the OAN report.
- 3.38 Figure 5.18 of the OAN report – replicated below – confirms that higher uplifts of 20% have been applied in authorities where lower quartile house prices equate to *less than* 12 years' earnings⁶³. An uplift of 15% has only been seen as appropriate in one authority (Braintree), where the affordability ratio was less than 10 and therefore notably lower than that now recorded in New Forest (12.48).

Figure 3.3: Comparison of Lower Quartile Affordability Ratio and Market Signals Uplift Applied



Source: JG Consulting; Lichfields

- 3.39 This suggests that an uplift of closer to 20% would provide a more reasonable response to market signals in New Forest, based on the logic applied in the OAN report itself but taking account of the latest available evidence for the district. A greater adjustment is inherently more likely to provide the additional housing needed to improve affordability in the study area, in line with the objectives of the PPG⁶⁴.

Affordable Housing Need

- 3.40 The OAN report evidences that the high cost of housing in New Forest has resulted in a significant need for affordable housing in the district, and its wider study area. It

⁶³ The original source of this analysis is referenced in the OAN report, and confirms that uplifts of 20% have been applied in four authorities with lower affordability ratios than New Forest (12.48). These authorities are Harlow (9.55); Wycombe (11.29); Chelmsford (11.36); and Canterbury (11.1), with the latter having been accepted by the Inspector and others having been concluded as reasonable in respective SHMAs

⁶⁴ PPG Reference ID 2a-020-20140306

calculates that 432 affordable homes (net) are needed annually across the study area, as summarised below.

Table 3.3: Net Annual Affordable Housing Need

	New Forest district	New Forest district outside NP	National Park total	Study area total
Net annual affordable housing need	428	361	71	432

Source: JG Consulting, 2017

- 3.41 Although the PPG methodology states that ‘*affordable housing need should...be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments*’⁶⁵, the OAN report recognises the complex relationship between these figures and concludes that no adjustment to the OAN is necessary. The Court of Appeal has since affirmed that ‘*planning judgment [is] required in gauging a suitable uplift to take account of the need for affordable housing*’, recognising that affordable housing need is derived from a ‘separate and different’ calculation and methodology⁶⁶. A previous High Court judgment confirmed that in determining the OAN, there is no requirement to meet calculated affordable housing needs in full⁶⁷.
- 3.42 Nonetheless, the claimed reduction in overall housing need belies the significant need for affordable housing across New Forest. There would evidently be considerable benefits in acknowledging and planning for a greater need for housing, with the District Council, for example, aiming to secure half of the homes delivered on larger sites outside of Totton and the Waterside area as affordable housing⁶⁸. Providing over 720 dwellings per annum in those parts of the district that fall outside of the National Park, for example, would have the potential to meet its affordable housing need in full, albeit such an illustrative exercise takes no account of site-specific viability considerations or the absence of affordable housing on small or windfall sites.

Summary

- 3.43 When considered in the context of the relevant PPG, the OAN evidence jointly commissioned by the District Council and NPA has a number of limitations and inconsistencies. These combine to underestimate the full need for housing across its study area, both within and outside of the National Park. They include:

⁶⁵ PPG Reference ID 2a-029-20140306

⁶⁶ *Jelson Ltd v Secretary of State for Communities and Local Government and Hinckley and Bosworth Borough Council* [2018] EWCA Civ 24

⁶⁷ *Borough Council of Kings Lynn and West Norfolk v Secretary of State for Communities and Local Government, ELM Park Holdings Ltd*, [2015] EWHC 2464 (Admin)

⁶⁸ New Forest District Council (2018) Local Plan Review 2016-2036 Part One: Planning Strategy, Submission Document for Regulation 19 Public Consultation, Policy 17 (p54)

- **The use of an unjustified and unnecessary approach to projecting population change**, which contrasts with recognised methodological approaches that more closely align with those applied in the development of official projections. The result is an implied level of population growth which is substantially lower than suggested by the official projections. While there is agreed to be merit in sensitivity testing this '*starting point*' to establish the implications of aligning with longer-term population trends in the area – given that a recent reduction in housing development has led to exceptionally low levels of population even outside of the National Park – this testing does not justify or necessitate such a fundamental and misrepresentative departure from the statistically robust methodology developed by the ONS. The 2014 SHMA identifies no such concerns about the validity of official projections, but instead agreed that their assumptions – which suggested that net migration to New Forest will increase in future, driving population growth – were a likely outcome of prevalent demographic trends in the district. The utilisation of a similar methodology indicates that a continuation of longer-term trends in New Forest district would generate a need for approximately 711 dwellings per annum, which almost precisely aligns with the need for 712 dwellings per annum currently implied by the '*starting point*' of the 2014-based household projections. This clearly undermines the stated need to reduce this '*starting point*' by some 29%;
- **The failure to give sufficient consideration to likely future job growth**, with the uncertainty of employment forecasts cited as the principal reason for openly deviating from an approach that has been used by the author elsewhere and has been widely accepted in responding to this stage of the PPG methodology. The uncertainty of economic forecasting is not confined to New Forest, and there are considered to be no exceptional circumstances which justify an alternative approach in this area. Such an approach merely risks failing to provide the housing needed to support the forecast continuation of recent job growth, and would also appear to threaten the realisation of the District Council's Economic Development Strategy. This will fail to provide the integrated housing and employment strategies required by the NPPF; and
- **An unjustifiably modest upward adjustment to respond to evidence of worsening market signals**, arising from an increasing imbalance between housing supply and demand. The 15% uplift applied within the evidence base falls towards the lower end of that which could be considered reasonable. A continued recent worsening in the relationship between house prices and earnings would suggest that an uplift of closer to 20% can be justified by the logic of the OAN report itself, and – particularly when applied to a representative demographic projection – would be inherently more likely to provide the additional housing needed to improve affordability in the district.

3.44 The above analysis clearly challenges the extent to which an OAN which falls 18% below the '*starting point*' provides an accurate reflection of future housing needs in New Forest. There is therefore evidence to suggest that there is a need for more than 584 dwellings per annum across the study area, to accommodate a continuation of historic demographic trends, support the local economy and appropriately respond to market signals.

4. Future Application of the Proposed Standard Method

- 4.1 As noted elsewhere in this report, the NPA has already submitted its Local Plan for examination, and the District Council intends to submit around the end of October⁶⁹.
- 4.2 On this basis, each authority will have submitted their respective Local Plans prior to the point at which the proposed standard method must be taken into account, based on the transitional arrangements set out in the revised NPPF.
- 4.3 The published OAN evidence did, however, anticipate an earlier implementation from April 2018, reflecting transitional arrangements proposed by Government at the time⁷⁰. This would have required account to be taken of the standard method.
- 4.4 The report therefore referenced the indicative figures produced by Government, and its implication that 965 dwellings per annum would be needed in New Forest based on the proposed method. As highlighted in section 2, this significantly exceeds the OAN concluded in the authorities' evidence base.
- 4.5 While acknowledging this figure, the report sought to advance a position whereby the standard method could not be practically applied in New Forest. This focused on the implications for the NPA, and the Government's recognition that the official statistics which form the basis for the formula are not published for National Parks⁷¹. The Government acknowledged that this would require the continued identification of housing need figures locally having '*regard to the best available information on anticipated changes in households as well as local income levels*'⁷². The authors of the OAN report therefore argued that the NPA '*will not be bound*' by the proposed method on this basis⁷³.
- 4.6 The report suggested that the District Council could '*arguably*' also deviate from the proposed method, given the '*substantial overlap*' between it and the NPA⁷⁴.
- 4.7 Since the report was prepared, the Government has further consulted on its proposed revisions to the NPPF, which were formally established as national policy on 24 July 2018. It has also consulted on accompanying updates to the PPG, albeit these draft proposals have yet to be translated into full guidance at the time of writing. This consultation material continued to recognise that data availability limits the

⁶⁹ <http://www.newforest.gov.uk/localplan2016>

⁷⁰ DCLG (2017) Planning for the right homes in the right places: consultation proposals, Table 1

⁷¹ *Ibid*, paragraph 45

⁷² *Ibid*, paragraph 45

⁷³ JG Consulting (2017) New Forest District Council and the New Forest National Park Authority: Objectively Assessed Housing Need (OAN) – Final Report, paragraph 1.30

⁷⁴ *Ibid*, paragraph 1.31

applicability of the standard method in National Parks, retaining the precise wording referenced above and in the OAN report⁷⁵.

- 4.8 While there are acknowledged difficulties in adhering to the standard method below authority level, it demonstrably can be followed to calculate a housing need figure for New Forest district as a whole. The draft PPG made clear that this should be treated as a '*reference point*' by Inspectors considering alternative methods⁷⁶.
- 4.9 There also exist practical means through which housing need figures calculated for New Forest district through the standard method can be disaggregated to those parts of the district that fall within and outside of the National Park. The evidence base fails to explore such mechanisms, instead reverting to an approach which produces significantly lower outcomes.
- 4.10 In disaggregating figures calculated through the standard method for the purposes of developing Neighbourhood Plans, the draft PPG suggests that the '*population of the neighbourhood area*' is one of several factors which can be taken into consideration when determining the proportion of the authority's housing need which each area should plan for⁷⁷. This could equally be advanced as a logical approach in those areas containing National Parks, and indeed such a pro-rata approach has been previously taken within the 2014 SHMA.
- 4.11 The OAN report notes that 82% of the district's residents live outside of the National Park. Disaggregating the district's indicative housing need figure (965dpa) on a pro-rata basis would suggest a need for around 790 dwellings per annum in those parts of New Forest district which fall outside of the NPA. This is around 50% higher than the OAN for 521 dwellings per annum concluded for this area, with the residual need for circa 175 dwellings per annum in the NPA almost three times that concluded in the evidence base⁷⁸ (63dpa).
- 4.12 It is acknowledged that the standard method remains subject to change upon the release of the 2016-based household projections in September 2018. When calculated through the method proposed to date, the substantially lower level of population growth which will underpin this projection – shown at Table 3.1 of this report – is likely to imply a lower figure for New Forest.
- 4.13 However, the Government has made clear its awareness of the impact of lower population projections, and acknowledged that such an outcome conflicts with its aim of building more homes⁷⁹. It has therefore outlined its intention to consider adjusting the method upon the release of new household projections. The forum reserves the future right to comment on the effect of any adjusted method as relevant to New Forest.

⁷⁵ MHCLG (2018) Draft Planning Practice Guidance, p26

⁷⁶ *Ibid*, p26

⁷⁷ *Ibid*, p33

⁷⁸ This can be interpreted as a minimum figure given its exclusion of housing need arising in parts of Test Valley and Wiltshire

⁷⁹ MHCLG (2018) Government response to the draft revised National Planning Policy Framework consultation: a summary of consultation responses and the Government's view on the way forward, p26 – 27

Summary

- 4.14 Under the proposed transitional arrangements set out within the revised NPPF, it is recognised that both the District Council and the NPA are expected to have submitted their Local Plans for Examination prior to the anticipated implementation of the proposed standard method. However, the future implications of the proposed standard method for calculating local housing need have been considered within this section. The current indicative figure published by the Government suggests a considerably higher need than the Council's concluded OAN, and it is anticipated that the integration of updated household projections and affordability ratios would continue to indicate a higher need than currently claimed across New Forest district. The precise method remains subject to change at the current point in time, however.
- 4.15 While there are acknowledged difficulties in adhering to the method below authority level, it can demonstrably be used to calculate a housing need figure for New Forest district as a whole. Although not of direct relevance to the examination of the current Local Plan, future reviews across New Forest can reasonably be expected to take account of the proposed standard method as a '*reference point*' and basis for disaggregation to the areas respectively covered by the District Council and NPA.
- 4.16 It is considered that the geographies of plan-making within New Forest are not so complex as to justify or necessitate departure from the standard method upon its implementation. While the OAN evidence has been prepared for a study area which extends to include parts of neighbouring Test Valley and Wiltshire, the calculated need for housing within the study area is largely confined within the district boundary as shown at Table 2.1 of this report. The difficulties in disaggregating such a figure are therefore considered to have been overstated.
- 4.17 Indeed, there exist practical mechanisms through which this figure can be disaggregated to those parts of the district that fall within and outside of the National Park. The insinuation that this method cannot in future be practically applied in New Forest is therefore unsubstantiated and challenged.

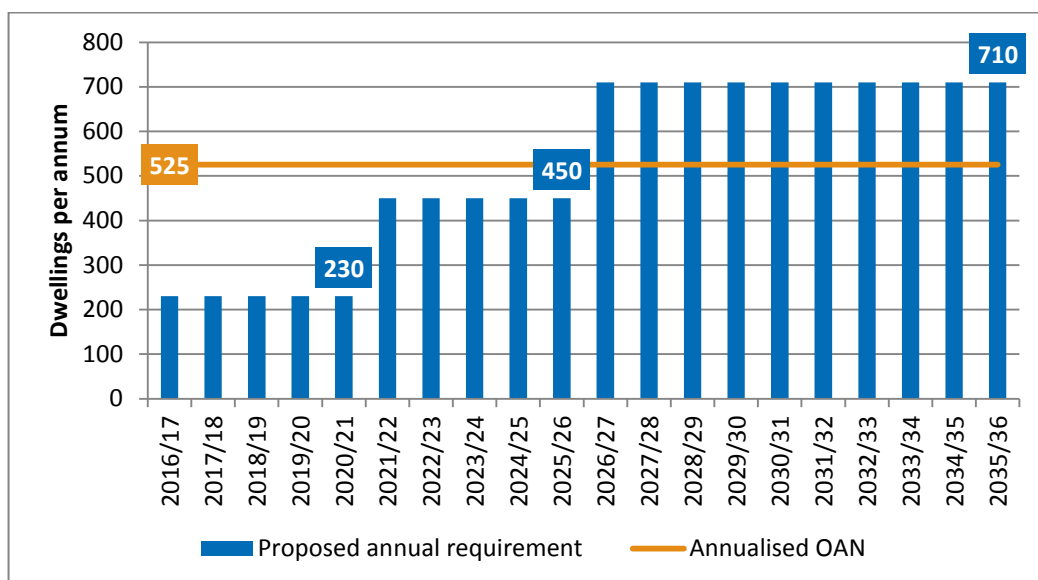
5. Emerging Policy Response

- 5.1 This section introduces the policy approach proposed by both the District Council and NPA, in responding to the evidenced housing need within the study area. This includes consideration of the implications of proposed phasing and the scale of unmet housing need arising from these strategies.

New Forest District outside the National Park

- 5.2 As introduced earlier in this report, the District Council has published the submission version of its Local Plan for those parts of the district which fall outside of the National Park, which is currently subject to consultation. This outlines an intention to provide ‘around 10,500 additional homes’ over the plan period⁸⁰ (2016 – 2036). This equates to an average of 525 dwellings per annum, which closely aligns with the OAN concluded in 2017 for those parts of the district that fall outside of the National Park (521dpa).
- 5.3 However, although the OAN is annualised through the calculation of an average over the full plan period, the emerging Local Plan proposes a phased approach to meeting this need. This seeks to provide fewer homes in the early years of the plan period, as illustrated in the following chart.

Figure 5.1: Proposed Phasing of Housing Requirement Relative to Evidenced OAN



Source: New Forest District Council, 2018

Suitability of proposed phasing

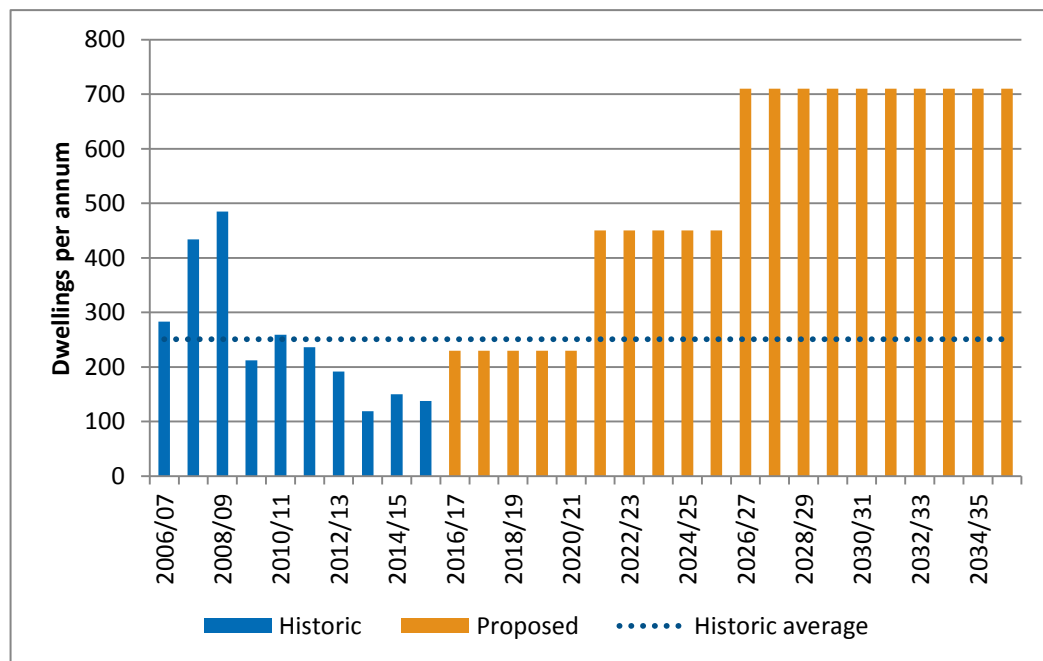
- 5.4 This phased approach is described as necessary to ‘deliver a near three-fold increase in housing completions compared to the preceding Core Strategy housing target’ of 196

⁸⁰ New Forest District Council (2018) Local Plan Review 2016-2036 Part One: Planning Strategy, Submission Document for Regulation 19 Public Consultation, Policy 5 (p22)

dwellings per annum, and reflects the ‘*practical reality of lead-in times*’⁸¹. However, the extent to which such a strategy will provide the housing required to meet the housing needs of its current and projected residents in the short-term does not appear to have been considered by the District Council.

- 5.5 As illustrated in the following chart, the proposed level of provision would fail to sustain even the historic rate of delivery seen prior to the plan period, surpassing this long-term average only from 2021. Over the first decade of the plan period, average annual housing delivery in the area would have increased by little more than a third (35%) when compared to historic rates.

Figure 5.2: Proposed Phasing in Context of Historic Delivery

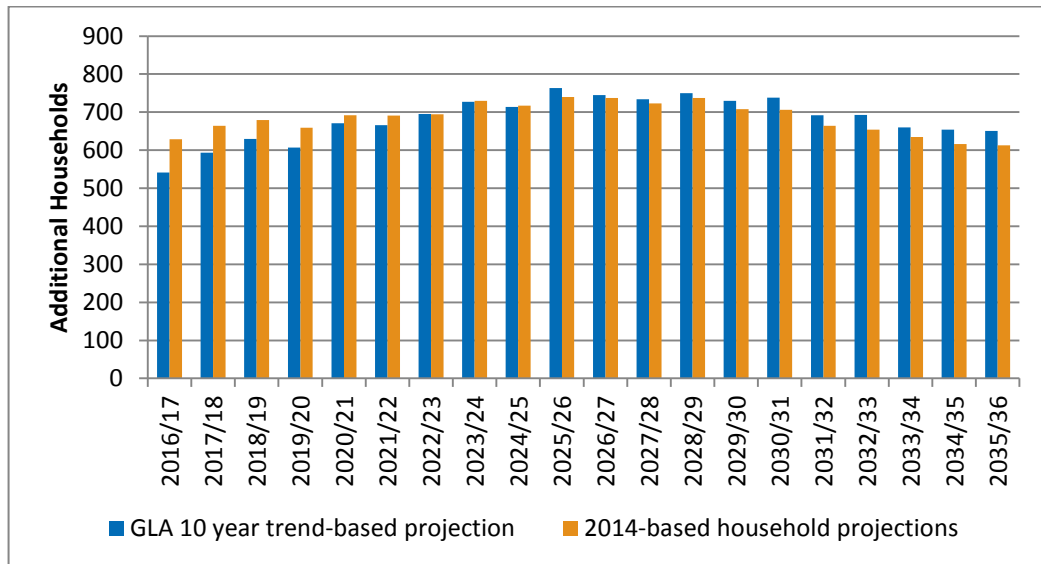


Source: New Forest District Council; Turley analysis

- 5.6 This recent delivery has itself not been sufficient to offset a further deterioration in the relationship between house prices and earnings, as illustrated at Figure 3.2 of this report. Failing to significantly boost housing supply in the short-term could be expected to further worsen affordability in New Forest.
- 5.7 This similarly conflicts with the projected formation of a relatively consistent number of households each year across New Forest district, implied both by the official 2014-based household projections and the variant GLA projections introduced in section 3 which draw upon a longer-term ten year trend period. There is no indication that household formation will be markedly lower in the early years of the plan period.

⁸¹ *Ibid*, p22

Figure 5.3: Projected Annual Household Formation in New Forest District (2016 – 2036)



Source: GLA; DCLG

- 5.8 The Government has expressed the urgent action required to fix the broken housing market within its Housing White Paper, outlining measures capable of *'building homes faster'* and articulating the importance of *'helping people now'*⁸². The foreword by then-Secretary of State Sajid Javid made clear that *'radical, lasting reform'* is needed to *'get more homes build right now and for many years to come'*.
- 5.9 There is recent precedent whereby Local Plan Inspectors have challenged disconnect between pressing housing need and stepped housing trajectories. In Guildford⁸³, the Inspector highlighted *'important issues regarding the timing of housing delivery'*, and stated that a stepped trajectory would *'negate the purpose'* of supply buffers applied to address persistent under-delivery. Such an approach was seen to *'frustrate attempts to address key factors affecting worsening affordability, and would be contrary to Government policy which is seeking to boost the supply of housing'*. The Inspector concluded that the Council *'should identify additional sources of housing delivery in the early years of the Plan'*, having been satisfied that such sites exist.
- 5.10 The District Council's proposals to phase the delivery of housing similarly conflicts with the urgency of housing need in the area, and contrasts with the clear objectives of Government.

New Forest National Park Authority and Unmet Need

- 5.11 This report has been prepared in the context of an ongoing consultation on the submission version of the District Council's Local Plan, which is concerned with those parts of the district that fall outside of the National Park.

⁸² DCLG (2017) Fixing our broken housing market – the housing white paper

⁸³ Inspector's guidance note for Hearing Agenda Item 14 (Boosting housing supply and early years provision), Guildford Local Plan Examination (22 June 2018)

- 5.12 However, the evidence jointly commissioned by the District Council and the NPA covers a study area defined to capture both plan-making authorities, reflected in its presentation of disaggregated figures that are replicated at Table 2.1 of this report. Notwithstanding the critique of the method through which these figures have been derived, this suggests a need for 63 dwellings per annum within the National Park.
- 5.13 The NPA submitted its own Local Plan for Examination in May 2018, which outlines proposals to deliver 800 dwellings over its plan period⁸⁴ (2016 – 2036). This equates to an average of only 40 dwellings per annum, which is 23 dwellings short of meeting its annual need within the evidence jointly produced by the authorities.
- 5.14 The submission version of the Local Plan prepared by the District Council for the area outside of the National Park does not state that any contribution is to be made towards accommodating the unmet needs of surrounding authorities, such as the NPA. Indeed, it fails to acknowledge that such an unmet need exists within close proximity.
- 5.15 The NPA has indicated that this is:
- “...due to significant environmental constraints which severely restrict the potential to accommodate development within the District [and] the Council is not in a position to assist the National Park Authority by making additional housing land allocations in its own Local Plan area”⁸⁵*
- 5.16 Collectively, the authorities in New Forest are planning to provide an average of 565 dwellings per annum across the study area. This is circa 20 dwellings per annum below the level of need concluded for the district or study area, and implies a total unmet need for approximately 400 homes over the shared plan period⁸⁶. The NPA has confirmed that no offers of assistance have been received from other authorities, resulting in this need remaining unmet.
- 5.17 This scale of unmet need represents a clear minimum, and is highly likely to be much larger than acknowledged by the authorities when considering the critique of the joint evidence base in this report.
- 5.18 The scale of this unmet need significantly increases when benchmarked against the need currently implied across the district by the proposed standard method, which – as outlined in the previous section – can be practically applied and disaggregated as necessary therein. This suggests that 965 dwellings per annum would be needed across the district, with an unmet need for 400 homes per annum arising relative to this figure. This is equivalent to some 8,000 homes over the plan period, albeit the minimum figures derived through the standard method are subject to change.

⁸⁴ New Forest National Park Authority (2018) New Forest National Park Local Plan 2016-2036, Regulation 19 Submission Draft, Policy SP19 (p55)

⁸⁵ New Forest National Park Authority (2018) Duty to Cooperate Statement – New Forest National Park Submission draft Local Plan 2016-2036, paragraph 5.11

⁸⁶ An unmet need for 19 dwellings per annum is implied relative to the OAN concluded for the “study area”, or 20 dwellings per annum relative to the OAN concluded for the district. The latter is a slightly smaller geography, but has a slightly higher housing need evidenced therein

Summary

5.19 Whilst the earlier analysis has found that the authorities' joint evidence base is likely to underestimate housing need across New Forest, it is evident from this section that the emerging policy position risks exacerbating this failure to meet housing needs. This is caused by:

- The existence of an unmet housing need arising within the study area, relative even to the OAN claimed within the joint evidence base; and
- The proposals to phase the housing requirement outside of the National Park, which will not provide the number of homes needed in this area during the first ten years of the plan period. This fails to accord with the Government's stated objective of boosting the supply of housing to address what is acknowledged as a current and pressing housing crisis.

6. Conclusions

- 6.1 On behalf of a forum of developers⁸⁷, this report has provided a review and technical critique of the OAN evidence jointly produced by New Forest District Council and the New Forest National Park Authority, which was published in October 2017.
- 6.2 This technical report is intended to inform wider representations submitted by the forum in relation to specific policies proposed within the submission version of the District Council's Local Plan, which is currently subject to consultation until 12 August 2018. It should therefore be read alongside and not in isolation of these submissions.
- 6.3 The evidence prepared by the District Council and the NPA concludes with an OAN for 584 dwellings per annum for a study area which extends to include the National Park in its entirety. This is geographically larger than New Forest district, although all of the housing needed in the study area appears to be captured within the district boundary given the conclusion that 585 dwellings per annum are needed within the district itself
- 6.4 The most recent evidence published by the District Council and the NPA therefore notably implies a reduction in housing need across New Forest, when compared with the earlier conclusions of the 2014 SHMA. On the basis of a review of and appreciation of the underlying housing market situation and available informing data, such a reduction is not considered to be justified. This reduction has resulted from the application of an alternative methodology which is considered to underestimate the full need for housing across the study area and is not considered to be compliant with applicable national guidance. Areas of specific concern with regards to the robustness of the methodology are summarised below:
- **The use of an unjustified and unnecessary approach to projecting population change**, which contrasts with recognised methodological approaches that more closely align with those applied in the development of official projections. The result is an implied level of population growth which is substantially lower than suggested by the official projections developed by the ONS. While there is agreed to be merit in sensitivity testing this '*starting point*' to establish the implications of aligning with longer-term population trends in the area – given that a recent reduction in housing development has led to exceptionally low levels of population growth even outside of the National Park – this testing does not justify or necessitate such a fundamental and misrepresentative departure from the statistically robust methodology developed by the ONS. The 2014 SHMA identifies no such concerns about the validity of official projections, but instead agreed that their assumptions – which suggested that net migration to New Forest will increase in future, driving population growth – were a likely outcome of prevalent demographic trends in the district. The utilisation of a similar methodology indicates that a continuation of longer-term trends in New Forest district would generate a need for approximately 711 dwellings per annum, which almost precisely aligns with the need for 712 dwellings per annum currently implied by the '*starting point*' of the 2014-based household

⁸⁷ Trustees of the Barker Mill Estates and Pennyfarthing Homes

projections. This clearly undermines the stated need to reduce this '*starting point*' by some 29%;

- **The failure to give sufficient consideration to likely future job growth**, with the uncertainty of employment forecasts cited as the principal reason for openly deviating from an approach that has been used by the author elsewhere and has been widely accepted in responding to this stage of the PPG methodology. The uncertainty of economic forecasting is not confined to New Forest, and there are considered to be no exceptional circumstances which justify an alternative approach in this area. Such an approach merely risks failing to provide the housing needed to support the forecast continuation of recent job growth, and would also appear to threaten the realisation of the District Council's Economic Development Strategy. This will fail to provide the integrated housing and employment strategies required by the NPPF; and
- **An unjustifiably modest upward adjustment to respond to evidence of worsening market signals**, arising from an increasing imbalance between housing supply and demand. The 15% uplift applied within the evidence base falls towards the lower end of that which could be considered reasonable. A continued recent worsening in the relationship between house prices and earnings would suggest that an uplift of closer to 20% can be justified by the logic of the OAN report itself, and – particularly when applied to a representative demographic projection – would be inherently more likely to provide the additional housing needed to improve affordability in the district.

- 6.5 The above clearly challenge the extent to which the claimed OAN is representative of future housing needs across the study area. There is therefore evidence that there is a need for more than 584 dwellings per annum across the study area, to accommodate a continuation of historic demographic trends, support the local economy and appropriately respond to market signals.
- 6.6 In turn, the evidence therefore strongly indicates that the full need for housing in the study area has been underestimated by the supporting evidence base. This forms an important context for considering the extent to which the respective Local Plans of the District Council and NPA are adequately providing for housing needs across the study area.
- 6.7 The submission version of the District Council's Local Plan, which covers those parts of the study area which fall outside of the National Park, outlines an intention to provide for only around 10,500 additional homes over the plan period (2016 – 2036). This equates to an average of 525 dwellings per annum.
- 6.8 On the basis of the submitted version of its own plan, which was submitted for Examination in May 2018, the NPA would make only a modest further contribution to providing for housing need in the study area, with proposals to deliver an average of 40 dwellings per annum over the same period (2016 – 2036).
- 6.9 Collectively, the District Council and NPA are therefore intending to provide only 565 dwellings per annum across the study area. This would result in a minimum unmet need of circa 400 dwellings per annum against even the claimed OAN in the latest

evidence, which itself is highly likely to be larger than acknowledged to date as a result of the points of critique set out above.

- 6.10 The consequences of failing to provide for needs in full will, on the basis of the current iterations of the emerging Local Plans, be compounded early in the plan period by the District Council's proposals to phase housing delivery and provide an average of only 340 homes annually over the first decade of the plan period, and only 230 dwellings per annum in the first five years. This would only modestly increase the recent supply of housing over the short-term, and risks failing to address worsening housing affordability. A comparable stepped approach has elsewhere been recently found to conflict with the Government's aims of boosting the supply of housing.
- 6.11 This critique has recognised that the transitional arrangements presented in the revised NPPF mean that the soundness of each Local Plan will be tested against the previous NPPF and PPG. This reflects a position whereby the NPA has submitted its Local Plan and the District Council intends to submit prior to the implementation of reforms. It is, however, acknowledged that the examination of both Local Plans will be conducted in the context of the NPPF's introduction of a new standard method for calculating housing need. The Government's published indicative outputs of this methodology indicate a substantially higher need for 965 dwellings per annum in New Forest district. While there are acknowledged difficulties in adhering to this method below authority level – and therefore in National Parks – there exist practical mechanisms through which this figure can be disaggregated to those parts of the district that fall within and outside of the National Park. It is not therefore reasonable to suggest that this method cannot in future be practically applied in New Forest, as is insinuated in the authorities' evidence. The geographies therein are not so complex as to justify departure from the standard method for the purposes of future Local Plan reviews.

**Appendix 1: Letter to New Forest District
Council on behalf of the Trustees of
the Barker Mill Estates, February
2018**

13 February 2018
Delivered by email

Mark Williams
Planning Policy
New Forest District Council
Appletree Court
Beaulieu Road
Lyndhurst
SO43 7PA

Dear Mr Williams

NEW FOREST DISTRICT LOCAL PLAN REVIEW – UPDATED TECHNICAL WORK ON HOUSING NEEDS

I am writing in connection with the emerging review of the New Forest District Local Plan, which I understand is due to be published for pre-submission consultation in the coming months. You will be aware that Turley has been promoting a number of sites in the district on behalf of the Trustees of the Barker Mill Estates.

In advance of the formal consultation later in the spring, we have been commissioned to review the latest evidence on the objectively assessed need (OAN) for housing in New Forest¹, which was published on your website in October 2017 and updates the Strategic Housing Market Assessment² (SHMA) produced in September 2014.

I appreciate that the forthcoming pre-submission consultation provides the next formal opportunity to comment on the emerging Local Plan and its evidence base, although I note that the Council has been inviting comments over recent weeks on the Council's approach to financial viability evidence. We have therefore taken this opportunity to express our complementary initial concerns relating to the robustness of the recently updated technical evidence on housing needs in New Forest. The comments below are intended to be constructive in nature, to assist the Council in ensuring that the Local Plan progresses in a manner which an Inspector will ultimately be able to find 'sound' when evaluated against the tests set within the National Planning Policy Framework (NPPF).

The Council's latest published evidence concludes with an OAN for 584 dwellings per annum across New Forest, including those parts of the National Park which fall within Test Valley and Wiltshire. This falls considerably below the OAN for 727 – 851 dwellings per annum concluded in the 2014 SHMA. Both studies are understood to have been undertaken to adhere with the NPPF by following the methodology set out in the current Planning Practice Guidance (PPG).

¹ JG Consulting (October 2017) New Forest District Council and the New Forest National Park Authority: Objectively Assessed Housing Need (OAN) – Final Report

² GL Hearn (September 2014) New Forest Strategic Housing Market Assessment

1 New York Street
Manchester
M1 4HD

T 0161 233 7676 turley.co.uk

The need for 521 dwellings per annum is implied by the Council's latest evidence for those parts of New Forest district which fall outside of the National Park (and which will form the spatial area for the emerging Local Plan). This is similarly lower than the previously evidenced need for between 587 and 687 dwellings per annum within the same area.

Following our technical review, we have a number of significant concerns and reservations about the approach taken within this updated evidence. Collectively, these concerns indicate to us that there is a genuine risk that the full need for housing in New Forest is being underestimated in the latest OAN calculation. In particular, we are concerned that:

- The update advocates a substantial reduction in the population growth trajectory implied by the Office for National Statistics' (ONS) latest official 2014-based population projections, on the basis of a preference for the use of a simple extrapolation of historic population counts. This fundamentally differs from the more robust approach employed by the ONS, and indeed the approach taken by the report's author elsewhere³. It also clearly differs from the approach previously taken in the SHMA. Indeed, the 2014 SHMA identified no such concerns about the 'validity' of official projections in this regard, and instead agreed that its assumptions – which suggested that net migration to New Forest will increase in future, driving population growth – were a likely outcome of prevalent demographic trends in the district⁴;
- The update attributes limited weight to guidance which clearly requires plan makers to assess likely job growth within the context of future labour supply. It acknowledges that this deviates from best practice⁵, which has been generally supported by recent Planning Inspector judgments, but it suggests that such an approach is required in the local circumstances of the New Forest. This interpretation of the methodology is not sufficiently justified, and presents a real risk that the Plan will fail to adequately integrate housing and employment policies as required through the NPPF. This will impact upon the extent to which the Plan will support the district's businesses and its future economic vitality; and
- The scale of uplift proposed to respond to worsening market signals in the New Forest falls at the lower end of that which could be considered reasonable, to reflect emerging guidance and Local Plan Inspectors' views. This is compounded by its application to a demographic projection which is likely to significantly underestimate future housing needs, and equally conflicts with evidence of a substantial need for affordable housing which could be positively addressed through a higher housing requirement.

In the context of the above, we also note that the latest OAN falls considerably below the higher need for housing implied in New Forest District when applying the new standard method proposed by Government⁶. Whilst we recognise that this currently can be considered as having no formal weight given its draft status, it evidently provides a clear indication of the Government's thinking on the factors which should inform a robust and honest assessment of future housing needs. The considerably higher level of need implied by the Government's proposals largely results from its attribution of increased weight to the official projections, and its clear view that there are '*very limited grounds*' for advancing a lower level of housing need. The Council is not considered to have evidenced such exceptional circumstances in New Forest District.

³ Paragraph 2.22 of the October 2017 OAN report

⁴ Paragraph 5.40 of the 2014 SHMA

⁵ Paragraph 3.8 of the October 2017 OAN report

⁶ DCLG (2017) Planning for the right homes in the right places: consultation proposals

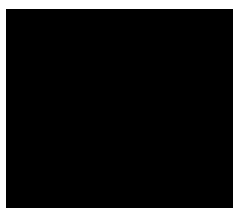
We also note in the context of the consultation proposals published by the Government that the argument is presented, within the Council's evidence, that the '*overlap*' between New Forest District and National Park may justify deviation from the standard method. This appears to us to be contradictory and unsubstantiated. The Government's consultation includes mechanisms for disaggregating local housing need figures which could equally be advanced in such circumstances, and would be likely to elevate housing needs beyond the concluded OAN.

Based on the above, there is a clear risk that the emerging Local Plan is being prepared on the basis of evidence which results in a significant underestimation of the need for housing, by failing to adequately adhere to current guidance (PPG) and the Government's suggested direction of future travel on the process for calculating local needs. Under such circumstances, our concern is that the Local Plan would fail to meet objectively assessed housing needs, and could not be considered sound or compliant with the NPPF.

The Trustees of the Barker Mill Estates broadly support the Council's review of the Local Plan, and are keen to ensure that it provides a sound basis through which the district's evidenced housing needs can be met. This must, however, be based on a robustly evidenced and objective assessment of housing needs. As detailed in this letter, we are concerned that the Council's evidence currently does not provide such a position.

We would be happy to discuss the concerns raised in this letter before the pre-submission consultation commences this spring, and consider that a meeting with relevant officers at the Council's offices in Lyndhurst would assist in resolving the identified issues. Please do let me and my colleague Peter Home know if this is something that you would be willing to arrange.

Yours sincerely



Andrew Lowe
Senior Planner, Economics

andrew.lowe@turley.co.uk

Turley
1 New York Street
Manchester
M1 4HD

T 0161 233 7676

Turley