

THE FRIENDS OF THE FORSTER COUNTRY





'To preserve for all time the open green space north of Stevenage known as the Forster Country'

PLANNING REPORT - HOUSING NUMBERS

DOCUMENT NUMBER FoFC 2016 PL / HO / 001 Rev 01

ASSESSMENT OF POPULATION CHANGE AND ASSOCIATED REQUIREMENT FOR NEW DWELLINGS

REFERENCE STEVENAGE BOROUGH LOCAL PLAN 2011 to 2031 PUBLICATION DRAFT JANUARY 2016

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REV	DATE	BY	CHKD	APPRD	MODIFICATIONS	STATUS
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REVISION STATUS INDEX							
SUMMARY OF CHANGES	SECTION NUMBER	REVISIONS					
		1	2	3	4	5	6

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Précis of main issues revised at 1.1a) to include a statement about unsoundness of the SBC Plan	1.1a)	01					
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DOCUMENT NUMBER FoFC 2016 PL / HO / 001 Rev 01

CONTENTS

1.0 EXECUTIVE SUMMARY

- 1.1 Précis of main issues
- 1.2 Conclusions
- 1.3 Recommendations

2.0 INTRODUCTION

- 2.1 Representations to SBC
- 2.2 Support for representation

3.0 SBC METHODOLOGY

- 3.1 Dwelling numbers

4.0 SHMA

- 4.1 Basis for future population growth
- 4.2 Changed circumstances
- 4.3 Assessment of dwelling numbers in the SHMA
- 4.4 Objectively Assessed Need
- 4.5 Dwellings Based on Average Occupancy

5.0 Housing Technical Paper (HTP)

- 5.1 Draft
- 5.2 Evidence base

6.0 FoFC work

- 6.1 Challenge to OAN
- 6.2 Validity of use of history to forecast the future.
- 6.3 Justification for 790 extra dwellings
- 6.4 Justification for 300 extra dwellings
- 6.5 Future Dwelling Numbers
- 6.6 Increase in rate of population growth.
- 6.7 Population density.

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DOCUMENT NUMBER FoFC 2016 PL / HO / 001 Rev 01

1.0 EXECUTIVE SUMMARY

1.1 Précis of main issues

- a) The Objectively Assessed Need (OAN) for dwellings stated in the Stevenage Borough Council (SBC) Local Plan at paragraph 9.1 is flawed in a way that makes it unsound in that it is not positively prepared, not justified and Inconsistent with national policy
- b) .To re-word the Plan including the subsidiary reports is a task that is not possible without an investment of time by a full team of people.
- c) The Plan has assessed population growth by extrapolating recent trends.
- d) The Plan has not used this population assessment to determine dwelling numbers and thus the value of assessing future population appears dubious and the time spent wasteful.
- e) The Plan has based its starting point for dwelling numbers on CLG forecasts which have been stated to be unsuitable for assessment of housing need.
- f) The Plan has assumed that the CLG forecasts do not include the requirement to compensate for current overcrowding, current homeless households or market signals.
- g) The addition to cover market signals is a judgement without an evidence base
- h) The 300 addition to 7,300 is a judgement without an evidence base
- i) The population increase implied by the planned additional dwellings far exceeds the population increase derived from the extrapolation referred to in item a) above
- j) If the approach of the Plan which leads to an increase in the rate of population growth is continued into the distant future the only solution left for Stevenage would be to move to high rise dwellings.
- k) The effect of the Plan is to add a huge strain in terms of population density to an already stretched town

1.2 Conclusions

It is concluded that the Objectively Assessed Need for dwellings stated in the Plan is too high.

1.3 Recommendations

- a) It is recommended that the Objectively Assessed Need for the number of additional dwellings be formally reviewed.
- b) This report recommends a minimum reduction in the need for additional dwellings of between 950 and 1,000.

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2.0 INTRODUCTION

2.1 Representations to SBC

In February 2016 the Friends of the Forster Country (FoFC) made representations to SBC on the Stevenage Borough Local Plan 2011 - 2031 – Publication draft – January 2016. Two of these representations challenged the number of dwellings stated in the Plan as being required. Indeed the representation relating to paragraph 9.1 of the Plan said that correct evidence for the predicted requirement for dwellings has not been produced and that the work done is both incomplete and incorrect.

2.2 Support for representation

This report seeks to state the reasons for the statement that the work done in producing the SBC Plan is incorrect.

3.0 STEVENAGE BOROUGH COUNCIL (SBC) METHODOLOGY

3.1 SHMA

SBC relies virtually totally on the Strategic Housing Market Assessment (SHMA) with some addition to determine future dwelling numbers.

4.0 SHMA

4.1 Basis for future population growth

FoFC believe that use of past figures is not a correct basis for future growth as the past figures themselves are merely the product of past building programmes permitted by SBC and which are now being used to support yet more expansion, so wrongly creating projections of an increase in the rate of population growth. On this basis a simple extrapolation would see an increase of about 23,000 in population by 2081 leading to around 10,500 further dwellings for which there is basically no room. So it appears that the current Plan is based merely on using all the available space in Stevenage now to cater for immigration into Stevenage either from other parts of the UK or from abroad.

The actual projected population growth for Stevenage given in the SHMA (Page 29) is 10,806 leading to a total population of 95,241 in 2031. **THIS FIGURE DOES NOT SEEM TO HAVE BEEN USED TO ESTABLISH AN OBJECTIVELY ASSESSED NEED FOR DWELLINGS.** If this is so it means that a large part of the SHMA serves no purpose.

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4.2 Changed circumstances

Since publication of the Plan, the UK has voted to leave the European Union and take control of its own borders. The population of the Country voted this way in the belief that part of the objective of this was to reduce immigration from abroad. If such a reduction is achieved, recent projections by CLG or the ONS require revision.

4.3 Assessment of dwelling numbers in the SHMA

The SHMA bases the projected number of required dwellings on CLG Household Projections to project numbers to 2031. FoFC believe that the population projection should lead to a lower number of dwellings. **THERE IS NO LINK IN THE SHMA BETWEEN POPULATION GROWTH AND DWELLING NUMBERS.** The word "occupancy" does not appear in the Local Plan or the Housing Technical Paper (HTP) even though such a figure can be found in various sources.

The SHMA, Page 30 – 2.64 paraphrased says "*Household Representative Rates (HRRs) are a demographic tool used to convert population into households*". *The HRRs used are key to the establishment of the number of households and, further, the number of households is key to the number of homes needed in future.*" It further says on page 32 at 2.73 "*Using the CLG 2012-based household representative rates, we can establish the projected number of additional households.*" But the SHMA does not show the derivation of household numbers from population using HRRS. **IT JUST USES CLG FIGURES AS ITS STARTING POINT.**

The basis for these figures including future projections, although backed by an authoritative organisation (CLG), is not easy to see. It would be quite reasonable to say that writing parts of the SHMA and of the SBC Local Plan was unnecessary and that dwelling numbers for Stevenage could just have been based on an extract from CLG figures plus modification with very little chance of challenge by the general population.

The SHMA at page 36 says that the notes accompanying the CLG Household Projections explicitly state that:

*"The 2012-based household projections are linked to the Office for National Statistics 2012-based sub-national population projections. **They are not an assessment of housing need** or do not take account of future policies, they are an indication of the likely increase in households given the **continuation of recent demographic trends.**"*

Further it is a matter of **great concern** that the annual dwelling growth for Stevenage was projected by CLG as 250 in 2008, 220 in 2011 and 380 in 2012 (see SHMA page 10). This is a variation of 72.7% in 1 year. It is suggested here that such a variation cannot represent a scientific basis for huge changes to people's lives and sheds doubt on the validity of work which it assumed has been produced by professionals.

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In view of the lack of explanation for these projections this report takes the view that CLG cannot be relied upon as an adequate basis for an objectively assessed need.

4.4 Objectively Assessed Need

The SHMA uses the following method for arriving at an objectively assessed need (OAN) for dwellings :-

1. Starting point CLG household projections
2. Add for requirement to compensate for current overcrowding (244 for Stevenage and NH)
3. Add for requirement to compensate for current homeless households (65 for Stevenage and NH)
4. Add for market signals (10% = approximately 550 for Stevenage)*
5. Add for conversion from households to dwellings (2.6% = 509)

* The SHMA says at page 51

There is no definitive guidance on what level of uplift is appropriate. Nevertheless, the Inspector examining the Eastleigh Local Plan judged 10% to be reasonable given the market signals identified for that HMA: *"It is very difficult to judge the appropriate scale of such an uplift ... Exploration of an uplift of, say, 10% would be compatible with the "modest" pressure of market signals recognised in the SHMA itself."*

The SHMA assumes that items 2, 3, 4 and 5 have not already been included in the CLG forecasts and this represents approximately 790 dwellings for Stevenage most of which is based on a judgement relating to an entirely different town. This number is most of the number proposed for Forster Country representing a loss of our Green Belt based on extremely flimsy evidence. A further 300 dwellings have been added by SBC as indicated elsewhere in this report.

4.5 Dwellings Based on Average Occupancy

Current Average Occupancy UK. The Office for National Statistics gives this figure as 2.33 people per household, compared to 2.4 in 2001.

Projected Average Occupancy UK. The table below indicates the predicted household size to the year 2033 as published by CLG

Year	2008	2018	2028	2033
Average household size (persons/household)	2.33	2.25	2.19	2.16

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PLANNING REPORT - HOUSING NUMBERS

DOCUMENT NUMBER FoFC 2016 PL / HO / 001 Rev 01

Current Average Occupancy Stevenage. The CLG gave the number of households in Stevenage in the year 2008 as 34,000. The population in that year was 82,686 by interpolation of the census figures for 2001 and 2011. Thus average occupancy was 2.43. The population of Stevenage in 2011 was 83,957 and at a slightly reduced occupancy of 2.405 in line with national trends this suggests approximately 34,900 households in 2011.

Projected Average Occupancy Stevenage. Using the same reduction ratio as for the whole of the UK, that is from 2.33 to 2.16 or an 8.3% reduction would see occupancy in Stevenage fall to 2.25.

Required households in 2031 based on projected population. The projected population in 2031 **depends on the basis for projection**. The maximum figure stated in Appendix A to this report which is broadly in line with the SHMA is **92,882**.

Assuming the higher figure of 92,882 for conservatism and an occupancy of 2.25 this leads to a housing stock of 41,280. The number of dwellings in 2011 was 34,900. Without allowing for the proportion of dwellings without a usually resident household this leads to a requirement to build for a further 6,380 households. Conservatively adding 2.6% (97.4% formation) for non occupancy which is the proportion stated in figure 25 of the SHMA leads to **6,546**. This is quite close to the figure of 6,634 also given stated in figure 25 of the SHMA but is a total figure not allowing for overcrowding or homelessness which added come to 107. Adding the 107 yields a final total figure for dwellings of **6,608** nearly 1,000 less than the final Plan figure.

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PLANNING REPORT - HOUSING NUMBERS

DOCUMENT NUMBER FoFC 2016 PL / HO / 001 Rev 01

5.0 Housing Technical Paper (HTP)

5.1 Draft

The SBC evidence concluding that the Objectively Assessed Need (OAN) for housing in Stevenage is 7,300 dwellings over the period 2011-2031 is based on the SHMA as stated on page 5 of the HTP. The HTP itself is a draft and still contains such basic errors as incomplete indexation.

5.2 Evidence base

The HTP (page 6) takes into account the Government's latest household projections for the Borough, which suggest that just over 7,600 new homes will be required. It is difficult to understand why a technical paper should take account of Government projections in this way. The paper should stand in its own right, reaching conclusions based on technical assessment not influenced by external factors.

6.0 FoFC work

6.1 Challenge to OAN

In view of the above doubts about the correctness of the Plan, FoFC believe that the OAN is flawed and expand on this within this section. FoFC have carried out several reviews of future population in Stevenage using a variety of methods. These are available as Appendix "A" to this report and we believe that they demonstrate a lesser need for dwellings. But the basis used by the SHMA was a starting point of CLG dwelling numbers so seeming to by-pass the "people" requirement.

6.2 Validity of use of history to forecast the future.

One of the basic premises of the Local Plan and its support documents is the reliance on past population growth to indicate future population growth. Such a principle is highly questionable and indeed may be considered incorrect. For example, the population of Middlesbrough was rising up to 1995 but then fell by about 6% between 1995 and 2010. It is now predicted to rise back to its 1995 levels by 2031 (Tees Valley Unlimited - the Local Enterprise Partnership delivering economic growth to the whole of the Tees Valley area) even though the 10 year trend preceding this was downwards. This seems to contradict the SBC Local Plan Premise. Further, the Governments attempts to stimulate a "Northern Powerhouse" which has been promoted to a great extent since the production of the CLG figures could ameliorate growth in the south to some extent.

6.3 Justification for 790 extra dwellings

FoFC do not believe that a figure which should have already been included in the CLG forecast combined with a non evidence based judgement from an entirely different area is acceptable to form what could become the basis for exceptional circumstances for the destruction of Green Belt.

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PLANNING REPORT - HOUSING NUMBERS

DOCUMENT NUMBER FoFC 2016 PL / HO / 001 Rev 01

6.4 Justification for 300 extra dwellings

Stevenage Concept. The Local Plan at page 43 item 5.67 says "*This plan sets a target slightly above the identified level of OAN*". It then gives a series of qualitative statements without proper justification of the increase of 300 homes stated. Again this should not form the basis for exceptional circumstances for the destruction of Green Belt.

6.5 Future Dwelling Numbers

If a further 7,600 dwellings are built in the next 20 years and people can afford to live in them this will inevitably lead to a population increase. These dwellings taken alone would lead to a population rise of around 15,990 based on a household size of 2.16 (see table above in section 4) and a formation rate of 97.4%. This far exceeds the population growth predictions in the SHMA of 10,860.

Further, extrapolating that dwelling growth trend forward would lead to a situation where the only remaining option in Stevenage would be to build upwards as all available open land apart from Fairlands Valley will have been taken. This questionable premise constitutes a self-fulfilling prophesy which would convert Stevenage away from its original concept of semi rural living to what many would regard as a bricks and mortar nightmare with further rises in dwellings to above what is already an unacceptably high density of housing outside a major metropolitan area.

6.6 Increase in rate of population growth.

Stevenage has seen a significant expansion to its housing stock over the last 10 years and this has produced a population increase in the town. Although the SHMA did not use its derived population figure to support the OAN, these population figures were presented based on past growth and FoFC believe that the intention of this was to support justification for a requirement for many more dwellings. Such extrapolation of population increase which itself is based on previous house building drives the anticipated population upwards for ever and this cannot be realistic anywhere and particularly in the UK and especially in Hertfordshire.

6.7 Population density.

Of the 196 countries in the World only 13 (6.6%) with a population of greater than 10 million are more densely populated than the UK. Hertfordshire is already the most densely populated shire county in the UK and Stevenage has 10 times the average population density in Hertfordshire as a whole as well as being more densely populated than most other towns in Hertfordshire. FoFC do not believe that it is fair and reasonable to ask Stevenage to bear an even greater strain in terms of population density to the point of losing its Green Belt which provides such an amenity for its people.