



Strategic Planning & Research Unit

For and on behalf of  
Redrow Homes Ltd

Rebuttal Evidence on Objectively Assessed Housing Need  
In respect of Telford and Wrekin Borough Council

**Land East of Kestrel Close & Beechfields Way, Newport, Shropshire**

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November 2016



Strategic Planning & Research Unit

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**PLANNING APPLICATION REF: TWC/2016/0704**

**APPEAL SITE: Land East of Kestrel Close & Beechfields Way,  
Newport, Shropshire**

**TOWN AND COUNTRY PLANNING ACT 1990  
SECTION 78**

**REBUTTAL EVIDENCE  
ON THE OBJECTIVELY ASSESSED HOUSING NEED FOR  
THE TELFORD AND WREKIN BOROUGH COUNCIL**

**Prepared on behalf of**

**Rebuttal Evidence  
of  
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## **0.0 EXECUTIVE SUMMARY**

0.1 This is rebuttal evidence on behalf of Roland Bolton on respect of the proof of evidence of Christina Howick of PBA.

0.2 There are in my opinion two main areas of disagreement;

- a. how to model the housing needs to accommodate future employment growth
- b. which is the appropriate approach to model future migration in terms of the age/sex of migrants

## **1.0 EMPLOYMENT GROWTH**

1.1 Both parties agree on this issue in one fundamental regard. Ms Howick and I both agree that it is necessary, in calculating the OAN for Telford, to look at the economic trends as part of the assessment of household growth. This is, as explained in my main proof of evidence, a necessary step to examine in line with the Government's guidance in the PPG.

1.2 In terms of modelling the need for housing from increased employment growth, I have used an average rate of employment growth as forecast by the three main forecasting houses commonly used in calculating OAN: Experian, Cambridge Econometrics and Oxford Economics. This approach has been advocated widely including by the South Worcestershire Development Plan Inspector. This dwelling requirement is the output of the Chelmer Model. This approach requires assumptions to be made regarding future changes to activity rates, unemployment, commuting and double jobbing in order to produce the output of the housing requirement.

1.3 The PBA approach is to feed into the Experian Economic Model their preferred population derived from their Demographic Forecasts this then "flexes" activity rates, unemployment, and commuting in order to balance the demographic inputs with the job growth.

1.4 It is my view that the Experian Model is not a model from which one can derive future housing needs, as population is an input to the model rather than an output. In other words, PBA input the population figure into the model and thereafter this does not change and cannot be changed. But if the jobs are created, as anticipated by the economic forecasting (an approach adopted by both parties) then PBA approach

(which adopts the Experian model) will not allow more people to come into the Borough. This is completely artificial. Instead, what PBA's approach does is see the model automatically adjust other outputs to compensate for this, such as commuting, unemployment and activity rates (See Tables 1 and 2). Ms Howick suggests (and has persuaded some Inspectors) that this means her approach is "internally consistent". But in truth it is a completely artificial and unjustified brake on household growth because it constraints the population (as this is a set input, which PBA inputs into the model).

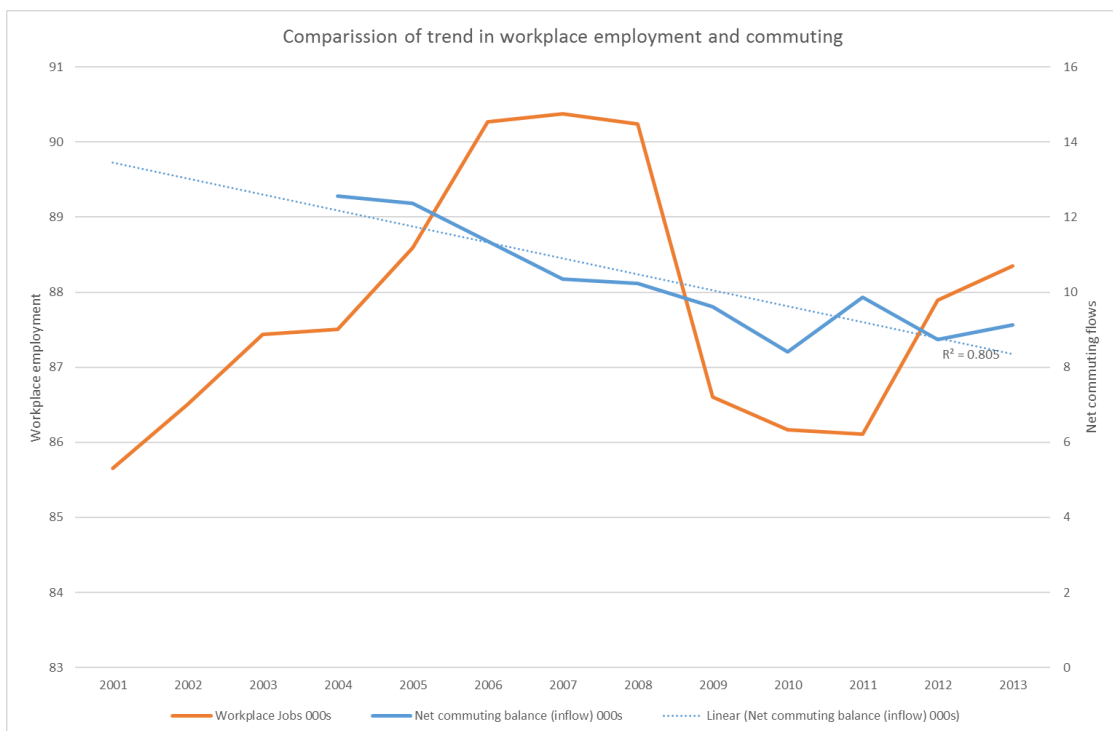
**Table 1 Summary of position at 2031 PBA baseline compared to 2003 2013 Trend**

	Baseline at 2031	PBA trend at 2031	Difference
Labour Force 000s	85.75	88.87	3.11
Labour Force - 16 to 64 000s	77.92	81.47	3.55
Labour Force - 65 Plus 000s	7.83	7.40	-0.43
Population - retired 000s	36.48	34.12	-2.36
Population - student 000s	34.27	37.23	2.95
Population - 16 Plus 000s	144.39	146.23	1.84
Population - 16 to 64 000s	103.34	107.68	4.34
Population - 65 Plus 000s	41.05	38.55	-2.50
Total Population 000s	178.66	183.46	4.79
Working Age Population 000s	107.91	112.11	4.20
Economic Activity Rate (%) - 16+	59.39	60.77	1.38
Economic Activity Rate (%) - 16 to 64	75.41	75.66	0.25
Economic Activity Rate (%) - 65 Plus	19.07	19.19	0.12
Economic Activity Rate (%) - Working Age	79.47	79.27	-0.20
Workplace Jobs 000s*	102.43	103.17	0.74
Jobs Demand 000s	103.04	103.17	0.13
FTE jobs 000s	84.05	84.20	0.15
Workplace based employment 000s	95.53	96.23	0.70
Residence based employment 000s	82.10	84.62	2.52
Net commuting balance (inflow) 000s	13.43	11.61	-1.82
Unemployment 000s	3.65	4.25	0.60
Unemployment Rate	4.26	4.78	0.52
GVA £m	3,117.12	3,117.12	0.00
Double Jobbing	4.25	4.30	0.05

Source: Appendix D: OAHN PBA 2015 (CD4.1)

**Commuting**

- 1.5 The Experian model does not allow for existing patterns of commuting to remain unchanged as these flex to resolve the projection. This is important as some of the 11,610 net commuters that the model forecasts will travel into Telford and Wrekin everyday by 2031 may wish to locate closer to their work.
- 1.6 I note with interest that while in 2004 the level of commuting was higher at over 12,000 this decreased to 8,400 before rising again to 9,135 in 2013 The end of the 10 year period considered by PBA. While employment growth fluctuated over this time (both increasing and then decreasing) the trend for commuting was one which largely decreased year on year. The output from the model of commuting rates gradually increasing over the period to 2031 requires to be judged in this context.



Source: Appendix D: OAHN PBA 2015 (CD4.1)

- 1.7 I note that the model reverses this trend and starts to return to higher rates of in commuting in 2014 (CD4.1 Appendix D - 10,604 baseline 10,583 Trend) such a change does not appear to align well with the previous trend of declining net in commuting.

1.8 I have already referred in my main proof to the comments of the Aylesbury Vale and South Worcestershire Inspectors' on this and the inappropriateness of changing the level of commuting. Economic Activity Rate.

**Economic Activity Rates**

1.9 In terms of activity rates these do not appear fixed within the model as can be seen by table 1. In the Trend option, all of the participant rates have increased (with the exception of the working age one).

1.10 This suggests that these aggregate activity rates are flexible within the model.

1.11 In terms of the adjustments I made to activity rates these have been a 2% uplift in all age groups with the exception of the pension age and the evidence used has previously been deemed to be acceptable at South Worcestershire plan examination.

1.12 In light of Howick's criticism of this approach I have remodelled the average employment growth scenario using the projected changes to activity rates from the Office for Budget Responsibility applied to the local activity rates. This is summarised in the table below.

1.13 This OBR based approach actually reduces activity rates for many of the below 60 age groups but this is compensated by higher rates of activity in the 60 + age groups

**Table 2 Revised Dwelling requirement based on average rate of Employment Change (OBR)**

	2011-2016	2016-2021	2021-2026	2026-2031	2011 2031	Annual Average 2011 - 2031
Dwelling change	1,020	886	1,014	688	18,042	902
Labour force change	769	127	328	25	6,249	312
Population change	1,624	934	1,422	885	24,325	1,216
Migration	740	87	685	283	8,974	449
Workplace employment	1,642	189	398	76	11,525	576
Resident employment	1,514	174	367	70	10,626	531
Resident unemployment	-713	-47	-38	-45	-4,215	-211

1.14 This makes a modest reduction in the dwelling requirement produced by my earlier projection but still suggests a substantial uplift would be required to meet these levels of employment growth.

**Double Jobbing**

- 1.15 In CD4.9 paragraph 2.86 it is stated that the PBA approach requires the level of people working two jobs will increase from 3% to 7% in 2031. CD4.9 paragraph 2.87 explains how double jobbing is estimated by subtracting the Workplace employment from Workplace Jobs.
- 1.16 Table 1 illustrates that this output changes in relation to the selected population.
- 1.17 In paragraph 2.88 it is explained that one reason for assuming an increase in double jobbing is the increase in potential part time jobs and paragraph 2.89 of CD 4.9 it is argued that the short-term increase in double jobbing nationally suggests that there should be a continued upward trend though out the period. I do not consider that such an assumption is sound, the increase in double jobbing at the national level is potentially a reaction to the recession and I do not consider that it is appropriate to extend this over the longer term.

**2.0 POPULATION GROWTH**

- 2.1 In my evidence, I highlighted the issue of what appeared to be an uncharacteristic change in the level of the working population. This has been confirmed to be a typo.
- 2.2 In respect of population growth, I have used the Cambridge Econometrics default inputs on the age sex of migrants (both in and out). This uses an age sex structure based upon the average of the last five years of migration as recorded by the mid year estimates. This results in an increase in population in all age groups by 2031 when compared to the 2014 SNPP.
- 2.3 The character (age/sex) of migration in the last 5 years will have been influenced by the increase level of development in Tedford and is therefore more likely to reflect the longer-term characteristics than a 10 year period which fully encapsulates the recession and a period of lower build rates.
- 2.4 The approach in the PBA work utilises trends for the past 10 years and results in higher population for younger age groups than the 2014 SNPP but lower populations for older age groups.
- 2.5 This results in an increase in population in all age groups by 2031 when compared to the 2014 SNPP. A similar point is recognised by PBA in paragraph 3.22 of the OAHN Report 2015 (CD4.1). This different age sex structure which boosts the

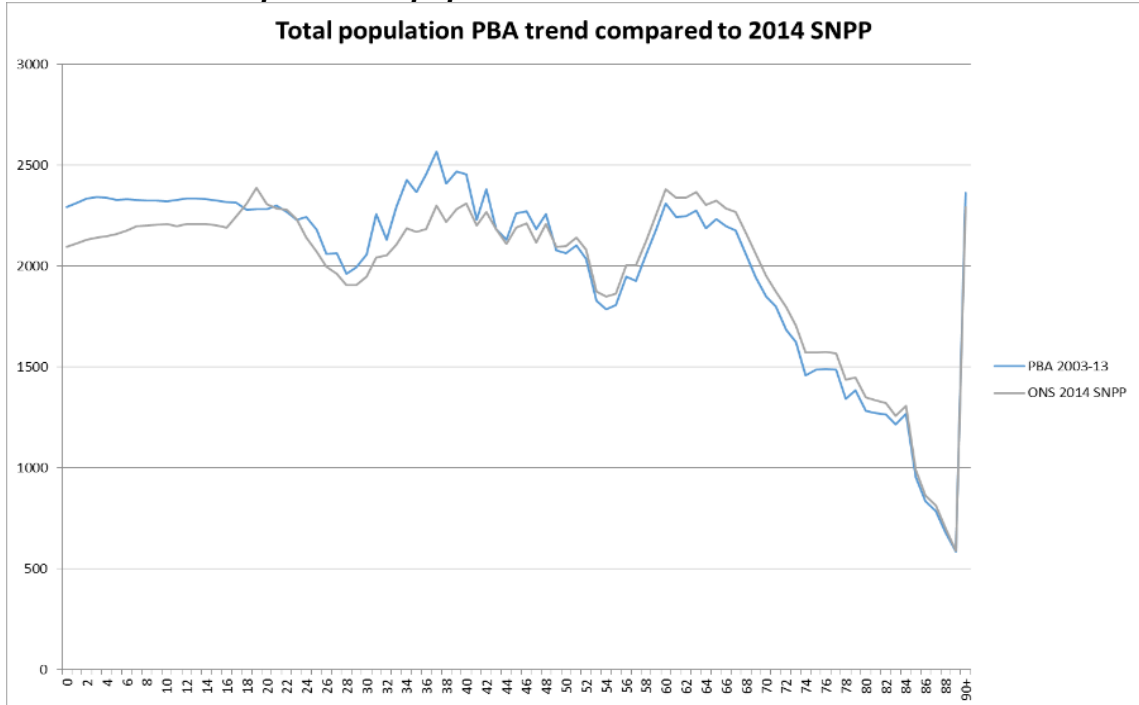


working age population while decreasing those of retirement age for the same population will have an impact on both the number of workers from a given population and the number of dwellings, because as explained in paragraph 3.22 of the OAHN Report 2015 (CD4.1) these age groups that have been increased have a lower headship rates.

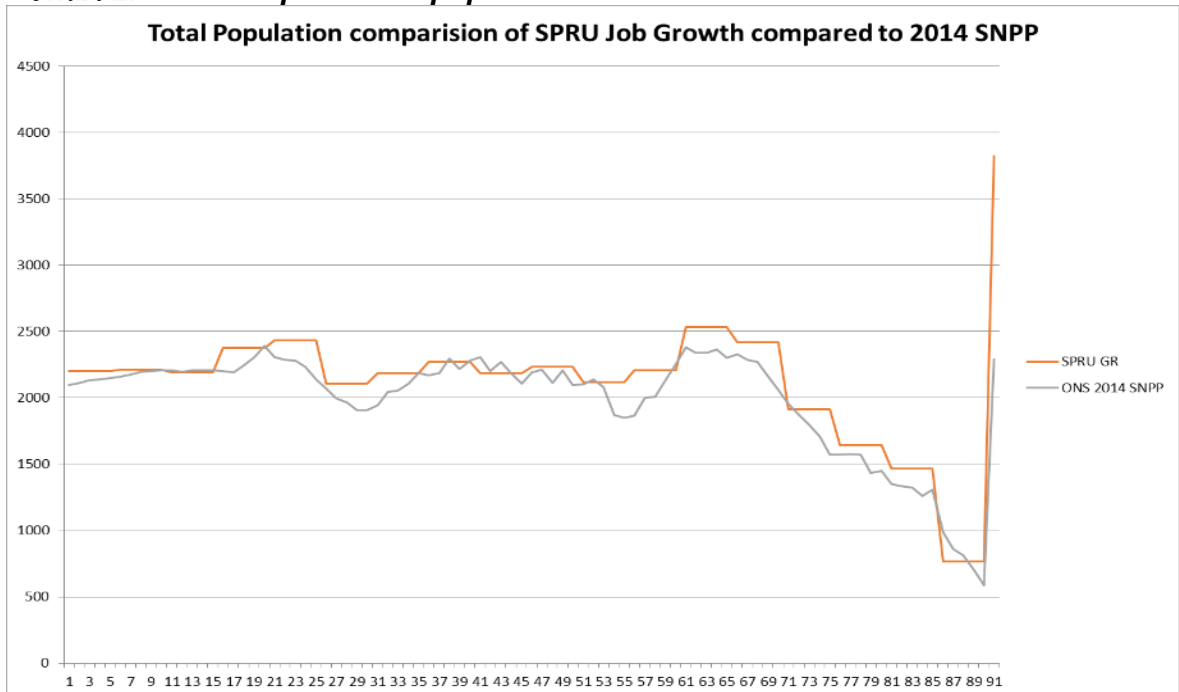
**Table 3 Comparison of population in 2031 PBA trend to 2014 SNPP**

Population Change 2011 to 2031	Change 2011 to 2031			Change compared to SNPP	
	SNPP	SPRU	2003 - 2013 PBA	SPRU	2003 - 2013 PBA
0-15	580	2,317	2,985	1,737	2,405
16-24	253	2,045	420	1,792	167
25-34	-1,088	684	233	1,772	1,321
35-44	-1,685	-1,110	-179	575	1,506
45-54	-2,486	-1,151	-2,414	1,335	72
55-64	2,012	4,233	1,357	2,221	-655
65-70	3,586	4,975	3,120	1,389	-466
71-84	8,927	11,253	7,738	2,326	-1,189
85+	3,602	5,101	3,506	1,499	-96
Total	13,701	28,348	16,766	14,647	3,065

**Chart 1: Comparison of population in 2031 PBA to 2014 SNPP**



**Chart 2: Comparison of population in 2031 SPRU GR to 2014 SNPP**



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- 2.6 The approach in the PBA work utilises trends for the past 10 years and results in higher population for younger age groups than the 2014 SNPP but lower populations for older age groups.
- 2.7 The character (age/sex) of migration in the last 5 years will have been influenced by the increase level of development in Tedford and is therefore more likely to reflect the longer-term characteristics than a 10 year period which fully encapsulates the recession.
- 2.8 The impact is that while the SPRU approach either maintains or increases the level of population in all groups the PBA approach substantially increases the population in the younger working age groups between 20 and 54 before modelling a lower level of population in the post 54 age groups.
- 2.9 It appears accepted between parties that this difference is likely to make a substantive impact on the conclusions that are reached regarding the appropriate level of housing to meet a particular total [population figure and by implication employment growth (CH PoE Paragraph 2.16 and OAHN CD4.1 paragraph 3.22)].

### **Household Representation Rates**

- 2.10 In paragraph 2.13 C Howick provides two reasons for not modelling a return to higher household formation rates:

#### ***National level evidence***

- 2.11 In the reference "whither household projections?" Ludi Simpson considered the weight that that one should place upon the then yet to be published 2012 DCLG household projections based on full 2011 Census data in the light of assumptions made in the interim projections about the effects of the economic downturn.
- 2.12 With reference to the ability of younger age groups to form households in the future and return fully to their past rates Simpson states:

*"Whether young adults aged 25-34 will recover to their previous levels of household formation when the economic situation improves is arguable, and is dependent on the success of 'Help to Buy' schemes and the impact of high affordability ratios, high rental prices, welfare retrenchment, and increased student fees and debts. The housing market and government policies to provide or stimulate affordable housing will affect future household formation."*

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- 2.13 Simpson goes on to state that the 2008-based projections were not as a solid trend because the past steady trends had already been broken prior to the recession. This is correct as the impact of the housing crisis was already well documented by Baker and others.
- 2.14 In note that the method by which the subsequent projections have addressed this is explained in the DCLG "Household Projections 2014 Based Methodology Report" the approach adopted to modelling future household formation is explained on page 16 as follows:

*"Projecting household representative rates The procedure followed to project the household representative rates at the national level is consistent with the 2011-interim projections, with 5 observations to project forward but there are remain issues that some of the Census points (particularly the 1991 Census) look to be quite strange.*

*The projections of the household representative rates use a combination of two fitted trends:*

*A simple logistics trend - a straight line fitted to  $\ln(X_t / (1-X_t))$*

*A dampened logistics trends where an S-shaped curve is fitted to  $\ln(X_t / (1-X_t))$*

*These functions were developed as part of the development for the Stage One methodological review to fit through the Census points as some of the trends are linear whilst others have a curve.*

*As with previous vintages of the projections, it is still not clear which of these is the most appropriate. The dampened trend provides a better fit for the Census data. But consideration has to be given to the extent to which data errors may have affected measured past trends and also to the fact that the data for 2011 by demographic type are estimates based on the trends by age from the LFS as well as some data from the 2011 Census. Further detail on concerns with some of the previous Census points (particularly 1991) is provided in the 2008-based methodology document.*

*Given the uncertainty, the alternative projections are weighted together using the following weights:*

*15 to 29 year olds: 80:20 weights for dampened / simple trend*

*30 year olds and over: 60:40 for dampened/ simple trend*

*The reason for the differential weights is that Labour Force Survey (LFS) data indicate declining aggregate household representative rates for the younger age groups and, consequently, there is evidence that it is more appropriate to give a bigger weight to the dampened trend in these cases.*

- 2.15 These are trend based projections and as such reflect previous levels of under provision that have led to the present housing crises. The PPG makes it clear that these projections do not reflect unmet need (Paragraph: 015 Reference ID: 2a-015-20140306).
- 2.16 Nationally the changes between 2001 and 2011 reflected in these projections are:
- a. The 36% rise for those living in Other households without dependent children;
  - b. The 30% rise between 2001 and 2011 for those living in Other households with dependent children;
  - c. Households with six or more people rose 25% between 2001 and 2011;
  - d. households with six or more people saw the largest proportional at almost 50%;
  - e. 18% of all occupied household spaces were privately rented, an increase from 12% in 2001. This was the largest increase of all housing tenure types;
  - f. The owner occupied declined from 69% to 64% over the same period.

*Source: 2011 Census Analysis, Households and Household Composition in England and Wales, 2001-2011*

- 2.17 It is interesting to note that Simpson accepts that planning interventions can impact upon outcomes in terms of local need:

*"In addition, demand for scenarios of household need and housing provision could be satisfied by an authoritative producer inside government or supported by government. Alternative scenarios can assess the impact of uncertainty in the factors not under local planners' control, such as fertility, mortality and international migration, and also assess the demographic consequences of planning investments that are under planners' control."*

- 2.18 I further note Simpson's concern that the lack of affordable housing undermines the assessment of housing need:

*"Some honest thinking is needed to resolve a mismatch between the need for affordable housing and the mechanisms to supply it. At present the lack of affordable*

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*housing undermines the assessment of housing need which demographic projections support.”*

2.19 It is not my reading of this article that Simpson concludes that utilising higher household formation rates is incorrect, indeed reference is explicitly made as to how planning interventions might impact upon demand and need.

2.20 In Simpson's later publication with Neil McDonald (Town & Country Planning April 2015) "Making sense of the new English household projections" they review the latest (2012) DCLG household projections for England and make suggestions for how they might be used intelligently. This states:

*Planners and the population specialists who support planning can consider a range of scenarios to represent current demographic trends. Current trends, or 'business as usual', are the starting point of plans, but we recognise that the evidence for what is the current trend does not point in a single accepted direction. Scenarios will represent plausible levels of future international and national migration, and alternative household representative rates that are also plausible, given the evidence about current trends.*

2.21 In terms of alternative scenarios two are suggested:

- *Household formation increasing: No further decrease in household representative rates for any age-sex-relationship group, leaving increases in place.*
- *Household formation not increasing: No further increase in household representative rates for any age-sex-relationship group, leaving decreases in place*

2.22 It is noted that I have modelled the impact of holding the Household Representation Rates as part of my assessment of different scenarios (see my table 12).

2.23 It would be incorrect therefore to take the conclusion from Simpsons earlier article on the then yet to emerge 2012 household projections that the household formation rates in the official DCLG cannot be varied. From a review of these two articles and the 2014 methodology report it appears that household formation is determined by a number of factors but that the long term under provision of housing, and the more recent recession has had a negative impact on the ability to form households and

so future government policy, including increasing supply may also have an impact household formation.

- 2.24 Lastly, I note that in the POPgroup Model's "User Guide 4: How to Create Population Projections led by a Plan for House-building" prepared by Simpson it highlights a number of issues which some users will want to consider, which cannot be given full treatment in this introductory guide. Including:

*"What if a plan changes the vacant housing rate, or representative rates, or migration profiles?"*

*Will household representative rates remain the same during the projection?*

*Will extra housing mean some 'spreading out' that increases representative rates?"*

**Local level evidence**

- 2.25 The first point to make is that household formation is not determined at the local level as many of the factors such as relative house prices are determined by a wider market.
- 2.26 Howick argues (paragraph 2.13) that there has been no evidence of historical undersupply and that formation rates are at or above national bench marks.

*Undersupply*

- 2.27 In my evidence, I highlight paragraphs 4.14 to 4.20 of the OAHN Report 2015 (CD 4.1) that confirms the area has under delivered against past targets. As these targets were set to meet the wider needs of the region the failure to meet them will have impacted on the wider housing market.

*National benchmarks*

- 2.28 In my evidence, I concerned myself with the 25 to 44 age groups in terms of modelling improvements to household formation rates.
- 2.29 At 2011 according to the data from the DCLG Household Projections Data Stage 1 the Telford based rates were above national rates for 10 of these 20 categories and while this is modelled forward the modelling indicates that only 4 categories will continue to improve considered against the national benchmark. Therefore, while the data suggest that the rates were higher for just over half the categories in 2011 this differential is modelled to be eroded in the period to 2031.

**Table 4 Comparison of Telford and Wrekin Household representative rates to England**

Age	Sex	Relationship	1991	2001	2011	2021	2031	Projected change in 2031 compared to 2001
25_29	M	C	101%	101%	98%	97%	95%	-3%
30_34	M	C	100%	100%	101%	106%	112%	11%
35_39	M	C	100%	100%	102%	104%	105%	5%
40_44	M	C	100%	100%	100%	100%	100%	0%
25_29	M	P	99%	120%	122%	121%	119%	-2%
30_34	M	P	112%	115%	117%	117%	109%	-5%
35_39	M	P	108%	111%	110%	110%	108%	-3%
40_44	M	P	101%	101%	96%	97%	96%	-6%
25_29	M	S	95%	96%	91%	89%	88%	-8%
30_34	M	S	92%	101%	98%	99%	100%	-1%
35_39	M	S	97%	104%	103%	103%	103%	-1%
40_44	M	S	93%	99%	98%	97%	96%	-3%
25_29	F	P	106%	120%	124%	126%	127%	7%
30_34	F	P	102%	106%	105%	105%	101%	-6%
35_39	F	P	103%	101%	96%	94%	88%	-13%
40_44	F	P	95%	101%	98%	99%	98%	-3%
25_29	F	S	113%	120%	117%	116%	115%	-4%
30_34	F	S	89%	104%	103%	103%	102%	-2%
35_39	F	S	86%	95%	98%	98%	98%	3%
40_44	F	S	106%	101%	99%	98%	98%	-2%

Source: DCLG 2014 Household Projections data stage 1 Household representative rates

2.30 In all but 5 categories the actual Rates will be lower in 2031 than they were in 2001, which I consider models a continued inability for these groups to form households compared to prerecession times (although still influenced by the overall undersupply).



**Table 5 Telford and Wrekin Household representative**

Age	Sex	Relationship	1991	2001	2011	2021	2031	Change 1991 to 2011	Change 2001 to 2031
25_29	M	C	0.989	0.979	0.853	0.814	0.768	-13.8%	-21.6%
30_34	M	C	0.992	0.990	0.937	0.952	0.951	-5.5%	-3.9%
35_39	M	C	0.994	0.995	0.991	0.999	0.998	-0.3%	0.3%
40_44	M	C	0.995	0.996	1.000	1.000	1.000	0.5%	0.4%
25_29	M	P	0.592	0.496	0.407	0.390	0.374	-31.2%	-24.5%
30_34	M	P	0.807	0.674	0.587	0.569	0.516	-27.3%	-23.4%
35_39	M	P	0.881	0.846	0.743	0.734	0.716	-15.7%	-15.3%
40_44	M	P	0.884	0.838	0.734	0.730	0.716	-17.0%	-14.5%
25_29	M	S	0.376	0.323	0.286	0.286	0.286	-23.8%	-11.2%
30_34	M	S	0.465	0.495	0.467	0.495	0.523	0.3%	5.8%
35_39	M	S	0.509	0.642	0.648	0.683	0.713	27.2%	11.1%
40_44	M	S	0.481	0.617	0.646	0.677	0.703	34.3%	13.8%
25_29	F	P	0.831	0.847	0.709	0.710	0.701	-14.7%	-17.2%
30_34	F	P	0.895	0.914	0.775	0.747	0.698	-13.4%	-23.6%
35_39	F	P	0.933	0.934	0.785	0.753	0.691	-15.9%	-26.0%
40_44	F	P	0.872	0.931	0.836	0.835	0.814	-4.1%	-12.6%
25_29	F	S	0.498	0.581	0.531	0.540	0.550	6.5%	-5.5%
30_34	F	S	0.521	0.722	0.706	0.738	0.759	35.5%	5.1%
35_39	F	S	0.529	0.718	0.781	0.825	0.849	47.6%	18.4%
40_44	F	S	0.631	0.734	0.796	0.839	0.871	26.0%	18.6%

Source: DCLG 2014 Household Projections data stage 1 Household representative rates

2.31 These 2014 rates are the correct starting point however given the future housing market that they deliver I do not consider that they are suitable in terms of meeting the aims of the government as expressed in the Framework (notably paragraph 17 and 50).

### 3.0 PAST PROVISION AND MARKET SIGNALS

#### Market signals

3.1 Howick in paragraph 2.18 describes as "good" an affordability ratio of 6 for both lower quartile and median earnings to lower quartile and median house prices. In both cases this rates has approximately doubled since 1997, it is my view that this does not represent good affordability but would present many with a barrier to home ownership.

**Past provision**

- 3.2 It is argued (paragraph 2.20 of CH PoE) that as the housing figures for the Amin Urban Areas (MUA's) were maximum targets it was not possible to under deliver against these targets.
- 3.3 These figures are from the 2004 Regional Spatial Strategy and table 1 page 38 sets out these figures describing them as "Annual Average Rate of Housing Provision"
- 3.4 Policy CF3 required development plans to make provision for these additional dwellings to be built at these annual rates and while these rates were to be applied as minima for the MUAs and maxima elsewhere there is little doubt that the policy intended these to be delivered as part of the "plan monitor and manage" regime and the sequential approach to be adopted to planning for housing.
- 3.5 Paragraph 6.17 of the RSS makes it clear that the annual the "plan monitor and manage" regime would determine appropriate responses to any divergence. In my view an undershooting of the annual average figure is as much as a divergence as an overshooting of the figure and would therefore require action.
- 3.6 Policy CF6: Managing housing land provision part B required the management of land release in a manner consistent with the rates set out in table 1.
- 3.7 As explained in the Core Strategy (paragraph 3.28 CD 3.9) the borough had a specific role under the Regional Spatial Strategy (and earlier policies) as a focus for economic growth and as a growth point in terms of population and housing (paragraph 3.23 and 4.13). In these circumstances falling to meet these targets had a wider than local implication in terms of the market.
- 3.8 It is also argued (CH paragraph 2.20) that undersupply against policy is not what is being referred to in the guidance but it is undersupply against demand or need. I disagree – under the "rate of deployment" (NPPG Paragraph: 019 Reference ID: 2a-019-20140306) reference is clearly made to the historic rate of development being below planned supply. I also note that the reason for under performance was partly related to supply (CD4.1 paragraph 4.15).
- 3.9 Given the doubling of the affordability ratio's I consider that this is evidence of under delivery against demand and need.

#### 4.0 CONCLUSION

4.1 I have reviewed the evidence that has been presented by Christine Howick and while I note that the approach has been accepted elsewhere, the evidence and appeal decisions she relies upon do not overcome my opinion that the proposed level of housing (497 dwellings a year) will be insufficient to accommodate the likely level of economic growth. This will in my view, it will lead to higher levels of net in commuting which I consider to be unsustainable. This is necessary in the work that PBA does because they use the Experian Model which uses population as an input to the model and holds it constant despite increases to the number of jobs.

4.2 It is further my view that simply inputting an alternative demographic projection into the Experian Model does not validate either the demographic projection or the outputs of the model given the relationship between jobs and population.

4.3 In my approach, I am not reliant upon a single economic projection, I have used an average of three projections and I have made reasonable assumptions regarding future potential changes to commuting, activity rates, unemployment, double jobbing. I have also made a small adjustment to the Household Representation Rates and used the most up to date information regarding the age and sex of migrants (2010 to 2015) which is coincidental with the return to historic build rates. On these grounds, I consider that the dwelling requirement of 933 dwellings is the correct OAN for the purposes of this appeal.

4.4 I note that the use of the Chelmer Model has been accepted by the Planning Inspectorate in both development plan examinations and appeals including:

- APP/J3720/A/10/2139071: regarding Land South of Kipling Road, Stratford-upon-Avon: The Planning Inspector described the Chelmer Model as:

*“a reliable and robust forecasting mechanism employed by many local authorities”.*

- APP/H1840/A/12/2171339: regarding Station Road, Honeybourne Worcestershire, the Planning Inspector stated in determining the 5 year land supply:

*“More up to date information is available in the CLG 2008 projections and the 2010 population figures adjusted using the Chelmer model are now available and relevant.”*

- Pulley Lane, Droitwich Spa decisions by the Secretary of State (APP/H1840/A/13/2199085 and APP/H1840/A/13/2199426) in which the Secretary of State (paragraph 14) supports the Inspector's findings (IL Paragraph 8.48) with regard to the approach taken by Mr Bateman, which utilised the Chelmer model in the labour force led mode (IL paragraph 3.66 Chelmer with Employment) and stated:

*“The only robust evidence that is before me is the methodology used by Mr Bateman. This is clear, well-reasoned and well justified. As such, Mr Bateman's figure for a requirement of about 14,263 dwellings between 2006 and 2030 should be preferred.”*

- 4.5 I am therefore confident that my assessment correctly reflects the magnitude of the level of housing likely to be required to meet the future economic growth of Telford and Wrekin.

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