

Town and Country Planning Act 1990 Section 78

Appeal by Redrow Midlands Ltd
Land east of Kestrel Close and Beechfields Way,
Newport

Rebuttal evidence of Cristina Howick On behalf of Telford and Wrekin Council

Peter Brett Associates

November 2016

Project Ref 32458

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APPENDIX A MUXTON LANE APPEAL DECISION

1 INTRODUCTION

- 1.1 This rebuttal, like my main evidence, relates to the objectively assessed housing need for Telford and Wrekin over the plan period 2011-31. It responds to the evidence of Roland Bolton on behalf of the appellant. In my rebuttal I first respond to Mr Bolton's criticisms of the Council's housing needs assessment, which was provided by my team at Peter Brett Associates (PBA). I then comment on Mr Bolton's own assessment of housing need.

2 THE COUNCIL'S HOUSING NEEDS ASSESSMENT

- 2.1 Mr Bolton's criticisms are directed at the objectively assessed need (OAN) figure of 497 net new dwellings per annum (dpa), which is taken from the OAN report of March 2015 (CD 4.1) produced by Peter Brett Associates for the Council. His challenge to this figure is under six headings, itemised as a. -f at paragraph 0.13 of his proof. I respond to these challenges in turn below.

CLG household projections

- 2.2 Mr Bolton notes that the Council's OAN figure of 497 dpa is based on the 2012-based CLG housing projection ('CLG 2012'), and this is now superseded by the recently published 2014-based projection (CLG 2014), which shows more household growth. He implies that the OAN should be updated to take account of the new projection, and this updated figure will be higher.
- 2.3 This challenge is now overtaken by events. Since Mr Bolton's proof was submitted the Council has published the Background Paper on Objectively Assessed Housing Need (CD4.9), also by PBA, which among other things updates the OAN calculation to take account of the CLG 2014 projection and the ONS 2014 sub-national population projection that underpins it. The updated calculation, which is set out in the Background Paper and summarised in my main proof, produces a revised OAN of 502 dpa, not significantly different from the previous figure of 497.
- 2.4 Both in our original calculation and the 2016 update we found that the 2012 official projections underestimated future migration. In our OAN calculation we created an alternative population scenario that removed this anomaly, showing higher population growth than the 2012 official projections. But our 2016 updated analysis showed that in the 2014 official projections the anomaly had been largely corrected. In this new analysis we still created an alternative scenario for the OAN calculation, which showed higher population growth than the official version, but this upward adjustment is much smaller than in the original calculation. Although our scenario shows higher population growth than the official projections, it produces the same housing need, 502 dpa, because in this higher-migration scenario the population is younger, so on average it lives in larger households (older people on average live in smaller households, because they do not have dependent children, and many are widowed).

- 2.5 In summary, therefore, we have updated our analysis to take account of the CLG 2014 projection. But the result is an OAN of 502 dpa, not significantly different from the previous figure of 497 dpa.

Net migration in 2015

- 2.6 Mr Bolton notes that the 2015 Mid-Year Population Estimates (ONS 2015) show net in-migration of over 1,000 people, far above recent levels and far above the ONS projections. He says that *'this suggests a return to previous levels of migration, associated to the... 1990s'*, and *'the 2015 MYE would suggest a higher demographic starting point for the assessment of the OAHN'*.
- 2.7 Mr Bolton's facts are correct: as pictured in Chart 1 of his proof, the migration estimated by ONS for 2015 shows a net inflow far above any year since 2001. But his inferences from those facts, are misleading. From a high figure for a single year it is blatantly unreasonable to infer that the 1990s have come back, so that migration in the next 15 years will remain at the same level.
- 2.8 One simple way to understand this is to apply the same logic to earlier years. In 2013, for example, the MYE figure for net migration to the borough was zero. But no one, least of all Mr Bolton, would suggest that a housing need calculation based on 2013 should assume zero net migration each year until 2031.
- 2.9 To take a sensible view of underlying trends we must look to historical periods much longer than a single year. This is why the official demographic projections roll forward migration trends from the previous five years; and it considered good practice to test these projections against longer base periods, usually 10 years, in case they are distorted by short-term factors. In the case of Telford, the PBA Trends 2005-15 scenario which underpins our updated OAN calculation is based on a 10-year migration trend, as its name indicates; and contrary to CLG 2012 this base period includes the very high migration for 2015.
- 2.10 Neither the official projections nor the PBA Trends scenario show a return to the 1990s, because since the 1990s the world has changed. Through much of the 20th century population was decentralising, away from the conurbations and towards rural areas and smaller towns, including New Towns such as Telford. In the new millennium this trend has abated, partly due to policies for urban renaissance. Demographic projections carry forward this changed reality.
- 2.11 To sum up, net migration to Telford & Wrekin in 2015, as estimated by the ONS, was exceptionally high. Our OAN calculation takes full account of this figure. It also takes account of the previous nine years, in which migration was much lower and often negative. A five-year-based projection, which takes account of the 2015 figure but ignore the long-term trend of much lower migration, would be a distortion of reality.

Household formation rates

- 2.12 At para 0.13 of his proof, which provides an initial overview of his criticisms of the Council's needs assessment, Mr Bolton says that the OAN calculation should have

adjusted the CLG formation rates *to account for evidence of 'suppressed household formation rates*. But in Section 5 of the proof, which sets out those criticisms in more detail, he provides no evidence that formation rates have been suppressed within the meaning of the PPG. In fact, Section 5 does not provide any evidence at all about household formation rates. Its only mentions of formation rates are made in the context of the Haygate Road appeal decision, to which I will return shortly.

2.13 The Council's evidence about housing formation rates is set out fully in the Council's Background Paper (CD 4.9), paragraphs 2.5 onwards, and summarised in my main proof of evidence to this appeal. We demonstrate that at national level expert studies, the PPG and planning Inspectors agree that the formation rates projected by CLG provide the best available view of long-term trends in housing demand, so there is no justification for adjusting them upwards. In line with the logic of the PPG, projections for individual areas may depart from these rates if there is local evidence to show that they carry forward a local undersupply of housing land. But for Telford and Wrekin the evidence is to the contrary.

2.14 All this evidence relates to the CLG 2012 formation rates. It applies equally to the CLG 2014 rates, which are produced by the same method and are virtually identical, as illustrated by Figure 3.2 of the Background Paper.

2.15 Against the above evidence Mr Bolton invokes the Haygate Road appeal decision (April 2016, CD 8.20), stating that '*The Inspector rejects a number of the Council's [points] as follows:*

... In terms of changes in headship rates the Council reference to recent academic articles to suggest that headship rates will continue to fall and will not return to the 2008 rates was rejected on the grounds that low household formation rates can and do have harmful social impacts, such as the creation of concealed households.

b. The correct response to falling headship rates is not simply to take these forward in the OAHN, but seek to address and improve this situation in view of the Framework's requirement that local planning authorities boost significantly the supply of housing (IL paragraph 42).'

2.16 Here Mr Bolton is misreading the Haygate decision, because he presents the Inspector's tentative comments as a firm verdict. What the Inspector did say is that he was unsure of the correct answer about formation rates, but had concluded that this did not matter, because fortunately he was not required to take a view on the OAN. This is clear if one reads the section relating to OAN (paras 37-52) of the Haygate decision in full, and especially from the following extracts (the emphases are mine):

*'42 The Council has made a number of criticisms of the BW OAN figure, particularly concerning the approach to changes in headship rates... it referred to recent academic articles³⁹ and argued that these suggest that headship rates will continue to fall and will not return to the 2008 rates, contrary to the approach adopted by the appellant. However, it is clear that low household formation rates can and do have harmful social impacts, such as the creation of concealed households. Because of this **I am not persuaded** that the correct response is simply to reflect these projected rates in the OAN, as appears to be suggested by the Council, rather than seeking to address and*

improve this situation as the appellant advocates, especially in view of the Framework's requirement that local planning authorities boost significantly the supply of housing...

47 Having regard to all the points detailed above I find it very difficult to reach a firm conclusion as to the robustness and reliability of the competing OANs, but in this case I do not consider it necessary for me to have to reach any such conclusion.'

- 2.17 I also note that the appeal decision on Muxton Lane (March 2016, Appendix A below) agrees with the Council's view on formation rates. In the Muxton appeal, Barton Willmore (BW), representing the appellant, argued for an uplift to the CLG formation rates, similar to Mr Bolton's approach in the present case. The Inspector's response was as follows:

'23 On household formation and suppressed need BW took the 2012 population forecasts produced by DCLG and added in an allowance for extra household formation. They argued that the PPG advises figures should be adjusted upwards (and so more houses would be needed) to take account of the suppressed need caused by the economic recession. I was specifically referred to paragraph 15 of the PPG. However, that is not how I read that paragraph. It says that "The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing." And goes on to add "local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply". It is clear there is no adjustment required because of a national housing crisis. Adjustments rely on local factors. The evidence put to me was that Telford had a better record than the national average for house prices and overcrowding and little different for concealed families. In particular, the affordability ratios were much better for Telford than Shropshire, the West Midlands or England and Wales.

- 2.18 In conclusion, there is no justification for an upward adjustment to the CLG household formation rates.

Market signals

- 2.19 Mr Bolton's initial overview of this argument, at para 0.13 of his proof, says that 'affordability has significantly worsened in Telford and Wrekin'. This seems to suggest that Mr Bolton would like to see a market signals uplift to the 'demographic starting point' projection.
- 2.20 The Council's analysis of market signals, presented in the March 2015 report and updated in the Background Paper, demonstrates that there is no justification for a market signals adjustment. In particular, the Background Paper (Figure 2.4) provides an updated analysis of housing affordability, the market indicator referenced by Mr Bolton. It suggests that in 2005-2010, the base period whose trends our starting point demographic projection rolls forward, the affordability ratio for Telford & Wrekin was virtually unchanged (we cannot be precise because there is a discontinuity in the data at

2013). Over this period (and indeed since records began in 1997) the level of affordability for the borough was better than the England average. In terms of change, in 2005-2010 the local ratio roughly paralleled the national trend, but in earlier years the borough did better than England.

- 2.21 In summary, there is nothing in the evidence to suggest that a projection based on 2005-10 (or indeed any period) should be adjusted upwards for market signals. This view was supported by the Muxton Lane Inspector, as stated in paragraph 23 of his decision, which I quoted earlier. The Haygate Inspector did not comment on market signals.

Recent housing delivery

- 2.22 Mr Bolton's preview of his argument at para 013 of his proof notes that '*recent rates of delivery have averaged 900 dwellings a year for the last five years, with the most recent year seeing 1,255 completions, commensurate with the recent level of in-migration*'. Again he does not say what this means for the OAN, but the suggestion is that this recent history justifies an OAN higher than the Council's figure of 497 (or 502) dpa.
- 2.23 I disagree with this suggestion. There is nothing in national policy or guidance to say that the OAN should be based on past trends in housing delivery. Even if past completions were a reliable indicator of future need, there would no reason for focus on delivery in the last five years. Over the 10-year base period of our 'demographic starting point' projection, 2005-15, housing completions averaged 681 per year.

Jobs and housing

- 2.24 Mr Bolton considers that the Council's analysis of labour market balance is unsound for four reasons, numbered i-iv, at para 013f of his proof. I discuss these criticisms in turn below.

- i '*The baseline projection (the 2012 SNPP) used by the OAHN Report 2015 (CD 4.1) suggests a decrease in the working age population in Telford and Wrekin of 4,900 persons; that is to be contrasted with the assumed increase of 4,900 persons in the working age population assumed in the Council's OAHN report.*'

As noted in the Background Paper, it is true that at table 4.1 of the March 2015 OAN report the figure 4,900 should be minus 4,900. I apologise for this error. Fortunately the error has no impact on the rest of the calculation, for reasons explained below. The corrected figure tells us that, in the Experian baseline scenario, the population aged 16-64 – comprising all residents, both economically active and inactive - is forecast to fall by 4,900 persons over the plan period.

- ii '*The resulting change to the working population is not an increase but a decrease.*'

This statement is wrong, because Mr Bolton confuses the so-called 'working-age population' (people aged 16-64) with the working population (people who are employed, regardless of age).

The fall of 4,900 is not a reduction in the *working population*. It is something quite different – a fall in in numbers of people, *whether working or not working*, in a particular age group. This group, aged 16-64, is traditionally described as 'the

working-age (not “working”) population’. But this label is increasingly misleading, because a growing proportion of people aged 65+ are working.

In the Experian baseline scenario, the working population does not fall over the plan period. On the contrary, it grows by 8.2 thousand people, the joint outcome of:

- An increase of 4.3 thousand in the resident labour force (employed and unemployed people, i.e. people working and people looking for work), The cause of this is increasing activity rates (the proportion of all people who are part of the workforce) among older people, including but not restricted to those aged 65+, due to rising State Pension ages and life expectancies;
 - A reduction of 4.2 thousand in unemployed people. The unemployed are counted as economically active, i.e. part of the workforce, but they are looking for work rather than working. When a person shifts from unemployed to employed (working) the labour force does not increase, but the working population does.
- iii *The assumption that net ~~migration~~ commuting will increase by 3,600 persons is not founded on evidence, and the requirement for these workers to be housed in neighbouring authorities has not been subject to the Duty to Cooperate which is a requirement for such cross-boundary issues.’*

I have corrected Mr Bolton’s text above because it seems clear that where he has written ‘net migration’ he means ‘net commuting’. Leaving this aside, his comment is based on a misunderstanding. The forecast change in commuting is not an *assumption*, i.e. an *input* into the forecasting model). Rather, it is a *result*, or *output*, of the forecasting model.

The evidence on which the forecast commuting is founded is the same evidence that underpins the other outputs of the model, including the forecast job growth. That evidence is embodied in the Experian forecasting model (other economic forecasting models are similar). It comprises a history of how different economic variables have changed in the last 30 years or so, a set of equations that establishes the relationships between these variable, and a body of economic theory that seeks to interpret these relationships.

Specifically, net commuting is calculated as the difference between forecast labour demand and labour supply in each authority. The model aims to replicate the interaction between different local labour markets; so that, in the model as in real life, where there is a surplus of labour in area but a deficit in a neighbouring areas commuting flows adjust, so that demand and supply are re-balanced as far as is realistically possible. This is why, in the model as in real life, it is neither reasonable or realistic to assume that commuting will remain fixed in future, as Mr Bolton does in his own OAN calculation. The Background Paper (para 2.54 onwards) comments further on why fixing commuting at its present level is incompatible with a sound forecast.

An increase in net commuting of 3.6 thousand over 20 years is a perfectly credible result, because history shows that it is normal for commuting to fluctuate, in response to the shifting balance of demand and supply between different areas. Between 2012 and 2015, for example, Experian’s historical data, based on the Annual Population Survey (APS) show the number rising by 2.5 thousand, from 8.7

thousand to 11.2 thousand. In proportional terms these changes in commuting are tiny, amounting to less than 5% of the borough's labour force.

Mr Bolton suggests that the forecast increase in commuting should be '*subject to the Duty to Co-operate*'. I think he means that commuting should not be allowed to change unless the authorities involved have agreed to such change. This is wildly unreasonable and unrealistic, given that commuting changes all the time, in ways that public authorities cannot control (people are free to choose where they work and live).

In some circumstances economic forecasts may predict large-scale changes in commuting flows, which could cause problems such as overloaded infrastructure or local labour shortages. In such cases the authorities involved should jointly consider action to change the flows or mitigate their impacts – though this would probably bear on policy targets (requirements) rather than objectively assessed need. But the scenario we have created for Telford and Wrekin does not predict such large-scale changes, only routine fluctuations in the travel-to-work flows.

- iv '*The assumption that 26% of the new jobs (some 4,300 jobs) will be taken by existing residents already in employment as a second job is unrealistic and not supported by credible evidence.*'

Again Mr Bolton is misunderstanding the Experian forecast. Like commuting and like total job numbers, the predicted increase in double-jobbing is not an assumption; it is a result (output) of the forecasting model. It is a credible result, because double-jobbing has been rising due to the growth in part-time, casual and self-employed work.

Thus, for the first four years on the plan period, 2011-15, Experian's historical data – which are based on official statistics – estimate that double-jobbing has already increased by 2,600, which means that in net terms 38% of new jobs were filled by people who already had a job. The reason why this proportion is so high is that over that particular period the estimated proportion of people who had two jobs increased steeply, 3.2% to 5.9%. Thus double-jobbers remained a small proportion of all people employed in the borough (by 2031 the proportion is forecast to rise to 7%) but they account for a high proportion of the *growth* in job numbers.

These figures are very approximate, like most economic statistics for small areas. But they are indicative of the direction of travel.

- 2.25 Mr Bolton makes a further criticism of PBA's labour market calculation, at para 5.5 of his proof. He says that the Experian model is circular, because it is constrained by local labour supply, which in turn is based on the SNPP. This criticism is incorrect. As explained at paragraph 2.43 of the Background Paper, Experian's local forecast includes a job demand number, which is unconstrained by local labour supply and which is calculated with no reference to labour supply. This figure is not routinely published by Experian but it is an integral part of their forecasts and is important to our calculations.
- 2.26 To sum up, Mr Bolton's criticisms of the Council's labour market calculations are based on technical misunderstandings. But beyond these details there is a wider disagreement between us in relation to labour market alignment. I will discuss this in the next section.

3 THE APPELLANT'S HOUSING NEEDS ASSESSMENT

Net migration

- 3.1 The first step in Mr Bolton's OAN calculation is similar to ours: he makes an upward revision to the officially projected net migration over the plan period. His net migration, like the ONS's, is based on projecting forward the last five years; but this base period is 2010-15 while the ONS's is 2009-14. The result is projected net migration over the plan period of 336 persons a year, against 57 a year in ONS 2014 and 131 a year in our assessment for the Council. Using the CLG 2014 household formation rates this translates into housing need of 667 dpa, against 502 in both CLG 2014 and the Council's assessment – which is based on a 10-year reference period, 2005-15
- 3.2 I do not understand how these figures come about (to say that they are produced by the Chelmer model does not answer the question, because the output of the model depends on the inputs that are fed into it). We have made our own five-year-based projections, based on migration in 2010-2015 and using our in-house model, which is similar to Chelmer. This projection, called PBA Trends 2010-15, is shown at Table 3.1 of the Background Paper. For the plan period 2011-31 it shows annual migration of 297 persons and annual housing need of 552 dpa, significantly less than Mr Bolton's five-year-based projection.
- 3.3 Mr Bolton in his paragraph 6.5 says that the Chelmer model uses 'a five-year rolling migration', which suggests that it might simply carry forward the average number of net migrants. If this were so, it would not be a correct method, because the whole point of reputable demographic models, like the ONS's and our own, is that they model the impact on migration of the changing age profile of the population both in the subject authority and the places with which it shares migration flows.
- 3.4 But I do not think Mr Bolton is simply carrying forward past migration, because the average net inflow in the five years to 2015, as shown in the MYEs, is 288 persons. He must be making some other adjustment that lifts the number of migrants, and maybe changes their age profile.
- 3.5 So Mr Bolton does not provide a clear explanation of the method and assumptions behind his population projection, which produces inexplicably high numbers. Nor does he provide a justification for using this method.

Household formation

- 3.6 As discussed earlier, Mr Bolton considers that the household formation rates projected by CLG should be adjusted upwards, because they reflect suppressed household formation in the base period of the projections. To effect this uplift he fixes formation rates for age groups under 45 at their 2014 rates. This lifts his assessed housing need from 668 to 698 dpa. An alternative uplift, in which formation rates return towards those projected in CLG 2008, brings housing need to 732 dpa.

- 3.7 I have already discussed, in Section 2 above, why these uplifts to household formation rates is unjustified in my view. The PPG says that the CLG projections are '*the best available estimate of future household growth*'¹. As I discuss elsewhere, this implies that the CLG formation rates should be relied on unless local evidence indicates otherwise.
- 3.8 If the Government wanted local planning authorities to uplift formation rates across England, without reference to local factors, it would delete the sentence I have quoted from the Guidance. Until and unless it does, Mr Bolton should not override the CLG formation rates unless he has local evidence to support that uplift. And he should not use the CLG 2008 formation rates, because they are now grossly out of date and refuted by more recent evidence,

Jobs and homes

- 3.9 In calculating labour market balance, Mr Bolton starts by averaging job growth forecasts from the three main forecasters, Experian, Cambridge Econometrics (CE) and Oxford Economics (OE). He takes the resulting job growth, 693 net new jobs p.a., as the demand for labour over the plan period. This view of future demand is virtually the same as the 710 jobs p.a. forecast by Experian that we use in our own updated labour market calculation for the Council (see Background Paper, para 3.8 onwards).
- 3.10 Mr Bolton's next step is to translate jobs into population and housing numbers, using the Chelmer model and his own assumptions about commuting, activity rates and unemployment. In Mr Bolton's main scenario, where some household formation rates are fixed at their 2014 levels, the result is a housing need of 888 dpa. In the alternative scenario, where formation rates return partially to CLG 2008 levels, the calculated need rises to 933 dpa. In contrast, our own analysis, based on Experian forecasts, shows that the 'demographic starting point' need of 502 dpa would provide enough or more than enough workers to fill a very slightly higher number of jobs.
- 3.11 Thus, in annual terms, to match job growth of about 700 Mr Bolton says that around 900 new homes will be needed, while we say that around 500 new homes will be needed. This is a very large difference. It is partly explained by Mr Bolton's arbitrary assumptions about commuting, unemployment and double-jobbing. But the main reason for the difference is a major inconsistency in Mr Bolton's analysis, which relates to economic activity rates and has become known as the logic trap. This is discussed at length in the Background Paper (paras 2.48 onwards).
- 3.12 To summarise the logic trap very briefly, Mr Bolton (like Barton Willmore before him) uses job forecasts to measure future job demand. These job forecasts are determined among other things by assumptions about future trends in activity rates; if activity rates are lower than the forecasters expect, then future job demand will also be lower than the forecasters expect. But in calculating local labour supply Mr Bolton does not accept these assumptions, but uses his own view of future activity rates, which is more pessimistic. As explained in the Background Paper, the modelling that we commissioned

¹ Reference ID: 2a-016-2015022

from Experian, which deals with activity rates in a logically correct manner, shows that even with much lower activity rates the local labour market remains in balance over the plan period.

- 3.13 The Muxton Lane Inspector, who endorsed the PBA view of labour market balance, summarised the issue as follows:

'27 The employment trends and forecasts argument turned mainly on the use of differing activity rates. If activity rates are lower, then for a given number of jobs more [population is] required and so there is a greater housing need. BW used activity rates derived from Kent County Council, which were often used in OAN calculations around the country, and were more pessimistic than those used in the PBA model, although there is no evidence to suggest that one should be preferred over the other. One effect of the PBA figures was to assume a high level of activity rates amongst older people which BW considered to be excessive. However, when PBA put the Kent CC activity rates through its own model, the outcomes were little different because with lower activity rates there is also lower economic activity as a whole and so less demand. PBA suggested BW had used lower activity rates but kept job predictions the same, hence the increase in workers and houses, whereas in fact job creation would fall, offsetting most of the upward pressure on housing caused by lower activity rates.'

- 3.14 The Haygate Inspector, contrary to the Muxton Inspector, was not convinced by PBA's approach to labour market balance. I think that is because he did not have before him all the evidence which has emerged by now, especially the confirmations from Experian and Oxford Economics. These confirmations, shown at para 2.52 of the Background Paper, say that forecasts are produced by integrated models, in which all variables are connected. Therefore, if adjustments are made to the assumptions behind their forecasts then the forecasts themselves lose their validity. It is not permissible to cherry-pick those parts of the forecasts that are convenient while dismissing other aspects to replace them with the user's own views.
- 3.15 In summary, Mr Bolton's calculation of labour market balance is invalid, mainly because of his inconsistent use of economic activity rates. The result of this and other errors is a grossly inflated view of future housing need.

4 CONCLUSION

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APPENDIX A MUXTON LANE APPEAL DECISION

