Broxtowe Borough Council
Gedling Borough Council
Nottingham City Council

Housing Background Paper Addendum

May 2013

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Content

1. Introduction

1.1 This report is an addendum to the Aligned Core Strategies Housing Background Paper (June 2012)[1]. As such, it should be read in conjunction with that paper.

1.2 As new information has become available since the Housing Background Paper was published, it is necessary to update various aspects of the Aligned Core Strategies evidence base, primarily the trajectories and assessment of the five year land supply, to include information up to 31st March 2012, and estimates of the need for affordable housing. Also, the first data from the 2011 Census has now been published and this needs to be taken into account.

1.3 Other topics covered by the Addendum seek to clarify issues which have been raised by representations on the Publication Version Aligned Core Strategies, such as how the housing evidence base was developed and the inclusion of student housing. It also includes the implications of the revocation of the East Midlands Regional Plan and the publication of the CLG Interim 2011-based household projections.

1.4 Please note that this Addendum is being published before Rushcliffe Borough Council's Cabinet meet on 14th May 2013 to consider a recommendation to consult on higher housing figures for their Core Strategy.

[1] See http://www.nottinghamcity.gov.uk/CHttpHandler.ashx?id=36318&p=0

2. The Development of the Housing Evidence for Greater Nottingham

2.1 This section sets out a time-line to clarify the process the Councils' undertook in preparing the housing evidence (the objectively assessed housing need) which supports the Aligned Core Strategy.

Chronology

2006/07 - Nottingham Core Strategic Housing Market Assessment (SHMA) published. An 'old style' SHMA pre dating the National Planning Policy Statement (NPPF) and therefore not primarily aimed at determining future housing provision, but instead primarily focussing on the characteristics of the housing market and affordable housing need.

March 2009 - East Midlands Regional Plan (the Regional Strategy) published.

2009 - SHMA updated for affordable housing need.

May 2010 – Coalition Government elected, and stated intent to abolish Regional Strategies.

November 2010 - Government's 2008-based Household Projections published.

Winter 2010/11 - As a result of the government's undertaking to abolish Regional Strategies, Edge Analytics were commissioned to examine the implications of different housing provision figures across the Housing Market Area (HMA) using the government's published 2008-based Household Projections. The intention was to aid decision makers in understanding the population and economic implications of housing provision decisions.

Summer 2011 - Broxtowe, Erewash, Gedling and Nottingham City Councils consulted on the results of this work in the Housing Provision Position Paper (as well as climate change and District specific matters) with a position that Regional Spatial Strategy numbers remained appropriate given that these figures allowed for continuing job growth, were similar to net nil migration and were considered the maximum deliverable, being significantly higher than housing delivery historically.

Rushcliffe separately and unilaterally consulted on their 'fresh approach' with a clear rejection of RSS but an absence of what they thought should happen in the rest of the Housing Market Area (HMA).

Winter 2011-12 As part of a package of measures to support councils through Core Strategy preparation, PAS gave pre-publication advice to the four aligned Councils and identified what they saw as a mismatch between economic ambitions/job provision and the housing figures to meet these. They advised that for the plan to be found sound, clear evidence reconciling the housing provision and the economic/job aspirations of the Core Strategies would be required.

Winter/Spring 2012 - Edge Analytics were again commissioned to examine the population and labour market implications of using 'rescaled' headship rates (based on local information on actual headship rates, as opposed to those assumed by the government's Household Projections) of the housing provision in all five HMA Council's emerging Core Strategies. Rescaled rates in Broxtowe, City and Rushcliffe showed that even with Rushcliffe's reduced figure there was provision to allow a net in migration of 1,200 people per annum with sufficient labour force to match with the job ambitions of the Core strategies. The Councils consider this to be an objective assessment of need, because the housing provision accords with the jobs/economic policies of the Core Strategies, and although the Core Strategy housing provision allows for a lower level of in-migration than that used by the government's Household Projections, they consider that there are good reasons to conclude that the levels of in-migration assumed in the Household Projections will not continue into the future. See the Household Projections Background Paper 2012[2] and the Housing Background Paper 2012[3].

March 2012 - National Planning Policy Framework published. Clarifies that SHMAs should be prepared to assess full housing needs of areas.

June 2012 - Aligned Core Strategies published alongside evidence in the various background papers.

July 2012 - First round of data from the 2011 Census published. Further work by the aligned councils (Housing Background Paper Addendum 2013) concludes that the rescaling of headship rates is supported by the new evidence, but that the Household Projections Background Paper (2012) had overstated somewhat the level of population supported by the housing provision, i.e. it overstates the implied level of in-migration to Greater Nottingham. The revised estimate concludes a level of in-migration of 850 per annum would be supported rather than 1,200. Further work on economic activity rates taking account of the 2011 Census can only be tentative, but it demonstrates that the labour force resulting from this level of housing provision is likely to still broadly support the economic and job aspirations of the Core Strategies. A major reason for this conclusion is that the former work took insufficient account of economically active people aged over 65.

November 2012 - SHMA updated for affordable housing need.

8 April 2013 - CLG Interim 2011-based household projections published. Strongly support the Council's approach to rescaling of headship rates for the 2008-based Household Projections.

12 April 2013 – East Midlands Regional Plan revoked.

2.2 The three Councils consider that the Housing Background Paper (2012), the Household Projections Background Paper (2012) and the Housing Background

[2] Document available at http://www.nottingham.gov.uk/hpbp
[3] Document available at http://www.nottinghamcity.gov.uk/CHttpHandler.ashx?id=36318&p=0

Paper Addendum (2013), when taken together report the full objectively assessed housing needs of the Housing Market Area and the plan area's contribution to meeting this need. For the Housing Market Area as a whole, the objectively assessed housing need 2011 to 2028 is considered to be 49,950 new homes, with the plan area's contribution being 30,550, as provided for in Policy 2 of the Aligned Core Strategies (see Table 7). This evidence fulfils the requirement of the NPPF for Strategic Housing Market Area Assessments to identify the scale of housing that the local population is likely to need over the plan period. A full update of the 2007 Strategic Housing Market Area Assessment will need to make extensive use of 2011 Census data and population and household projections based upon it. Because of this, it is not practicable to produce such an update at this time. Timetables for release of census data and official projections mean that the earliest it could be started is 2014.

2.3 The 3 aligned Councils and Erewash published their Core Strategies on the basis that the total housing provision across the HMA (including Rushcliffe Borough Council) would meet objectively assessed needs of the HMA as a whole, taking into account population/demographic change, cross boundary provision, affordable housing need and economic/ job growth aspirations.

2.4 Further work looking at the implications of the early results of the 2011 Census and the Government's Interim 2011-based household projections indicates that applying local information in the assessment of housing needs is justified, but the housing provision allows for a somewhat lower level of in-migration than the Housing Background Paper/Publication Aligned Core Strategy.

2.5 The 3 aligned Councils consider that their Core Strategies continue to provide for the objectively assessed needs of the area, supported by the following points:

i) The Councils have used the most up to date information available to assess housing need (government's 2008-based Household Projections), applying more recent up to date local information where appropriate. The results have been reconsidered in the light of the 2011 Census and the Interim 2011-based Household Projections .

ii) An increase in housing provision of 1,950 (up to 2026) across the HMA would allow for the same level of demographic change as implied by the Publication Aligned Core Strategies, this level of provision is somewhat less than the 'Option for Consultation' Aligned Core Strategies which Rushcliffe Borough were party to.

iii) By unilaterally taking a locally determined approach to housing provision, Rushcliffe Borough has not met its Duty to Cooperate. Any uplift in housing numbers should apply only to the Rushcliffe Core Strategy. A housing provision in the Rushcliffe Core Strategy of 11,550 (including the 1,950 homes identified above, and the 200 homes included in the Proposed Modifications to the Rushcliffe Core Strategy) would allow for the same level of demographic change as implied by the Publication Aligned Core Strategies. However, this does not take account of the 2028 end-date of the Aligned Core Strategies and the Erewash Core Strategy.

iv) There are options within the Rushcliffe Borough area to make up for this shortfall, as evidenced by the Option for Consultation Aligned Core Strategy, (i.e. a larger Clifton proposal and/or land at Gamston). These options have the benefit of being located on the edge of the main built up area of Nottingham. The housing market in Rushcliffe Borough is the strongest in the HMA.

v) Whilst the Regional Strategy (East Midlands Regional Plan 2009) has now been revoked, the evidence on which it was based remains valid. In particular the Green Belt review (2007) and the Assessment of Sustainable Urban Extensions (2008). The Assessment of Sustainable Urban Extensions was prepared in the light of the Green Belt review (2007), and provides technical guidance in order to help with policy preparation rather than amounting to policy in itself.

vi) Notwithstanding the above, proposed changes to the Aligned Core Strategies include a commitment to review the Core Strategies should evidence from the government's 2012-based Household Projections (anticipated in 2014) indicate that assumptions underpinning housing provision in the Aligned Core Strategies are no longer appropriate.

2.6 It should be noted that Rushcliffe Borough Council's Cabinet are meeting on 14th May 2013, which is after the publication of this Addendum, to consider a recommendation to undertake public consultation and necessary supporting work on higher housing figures for the Borough. This is in response to concerns raised by the Planning Inspector appointed to examine their Core Strategy and includes a proposal to extend the plan-period to 2028.

3. The Implications of the Revocation of the Regional Plan

3.1 Although the Regional Plan was revoked on 12th April 2013, the Aligned Core Strategies authorities do not consider that the revocation has any implications for the housing provision figures in their Core Strategies. They believe that the housing provision continues to provide for the objectively assessed housing needs. The following paragraphs give the reasons for reaching this conclusion.

3.2 The basis for the projections behind the housing provision figures is the latest official projections (in this case, the CLG 2008-based household projections), in accordance with the National Planning Policy Framework (NPPF). As detailed in the Household Projections Background Paper (June 2012), these projections were refined to take account of local evidence that household headship rates[4] were not as high as had been projected in Broxtowe, Nottingham and Rushcliffe. This conclusion about headship rates has been borne out by figures from the 2011 Census[5].

3.3 In addition, it was considered that the net in-migration in the ONS 2008-based population projections which are used in the CLG household projections, being based upon past trends, were not realistic, as they reflect a period of large growth in the number of university students and high levels of international immigration. The assumed future migration used in the projections was, therefore, reduced to what was considered to be a reasonable level.

3.4 The projections were produced at the Housing Market Area (HMA) level, although because of the way in which the projection model works they had to be aggregated from district projections. Comparison at the HMA level shows that the projections are in line with the Core Strategies' economic aspirations of an increase in jobs of 37,000 between 2011 and 2028[6]. The comparison between the labour supply figures from the projections and the economic aspirations is given in para. 57 of the Employment Background Paper (June 2012) and the implications of the initial 2011 Census data for this are dealt with in Chapter 4 of this Addendum.

3.5 To increase the level of net in-migration and housing would require an increase in the number of jobs which is not considered realistic in the current economic climate. Likewise, to reduce them would lead to a less aspirational jobs increase which is not considered desirable for one of the country's Core Cities.

3.6 The allocation of the HMA's housing requirement to the Aligned Core Strategies districts and Erewash has been agreed by those authorities, taking into account the inability of Nottingham City to provide for all of its housing needs and the availability of suitable sites and locations for housing in the other districts. Neither this nor the projections are affected by the revocation of the Regional Plan.

[4] The proportion of people in each age-group that "head" a household.
[5] See Chapter 3 of the Housing Background Paper Addendum.
[6] See para. 3.4.1 of the Aligned Core Strategies Publication Version (June 2012).

4. Implications of data from the 2011 Census

Background

4.1 The Office for National Statistics (ONS) published the first results from the 2011 Census on 16th July 2012. These just give the population by age and sex, the number of households[7] and the total number of people not living in households. The original figures were rounded to the nearest 100, but these have since been augmented by the precise figures.

4.2 During the preparation of the Core Strategies, the local authorities commissioned population and household projections which showed the implications of the housing figures in the Core Strategies in terms of the population, migration and economically active population. The results of these projections are summarised in the Household Projections Background Paper[8]. This chapter compares the 2011 Census results with the 2011 data contained in the projections, so far as possible, in order to see if the support which they provided for the Core Strategies' housing figures is still valid.

Population

4.3 Since 2001, ONS have produced Mid-Year Estimates (MYEs) of the population which were based upon the 2001 Census, registered births and deaths and estimates of migration. The 2010 MYEs were used as the basis for the Core Strategy projections.

4.4 Table 1 and Figure 1 compare the total population in the 2010 MYEs with Census figures. Table 1 also includes the 2010 Indicative Revised Estimates, which ONS have published (but not as official estimates) to show the effects of what they regard as an improved method of allocating migration around the country which they propose to use for MYEs beyond 2011. When comparing the figures it needs to be borne in mind that the Census (27th March 2011) was nine months later than the 2010 MYEs (30th June 2010)[9].

[7] A household is defined as one person living alone, or a group of people (not necessarily related) living at the same address who share cooking facilities and share a living room, sitting room or dining area.
[8] Document is available at http://www.nottinghamcity.gov.uk/CHttpHandler.ashx?id=36319&p=0
[9] The 2011 MYEs have been published since the Census date. The main difference is that the City's MYE is 303,900, or 1,800 below the Census figure. This is because, although students are generally counted at their term-time address, many students had finished their courses and moved away from Nottingham between Census Day and the MYE date, and new students had not yet arrived to replace them.

Figure 1: 2011 Census population minus the 2010 Mid-Year Estimates

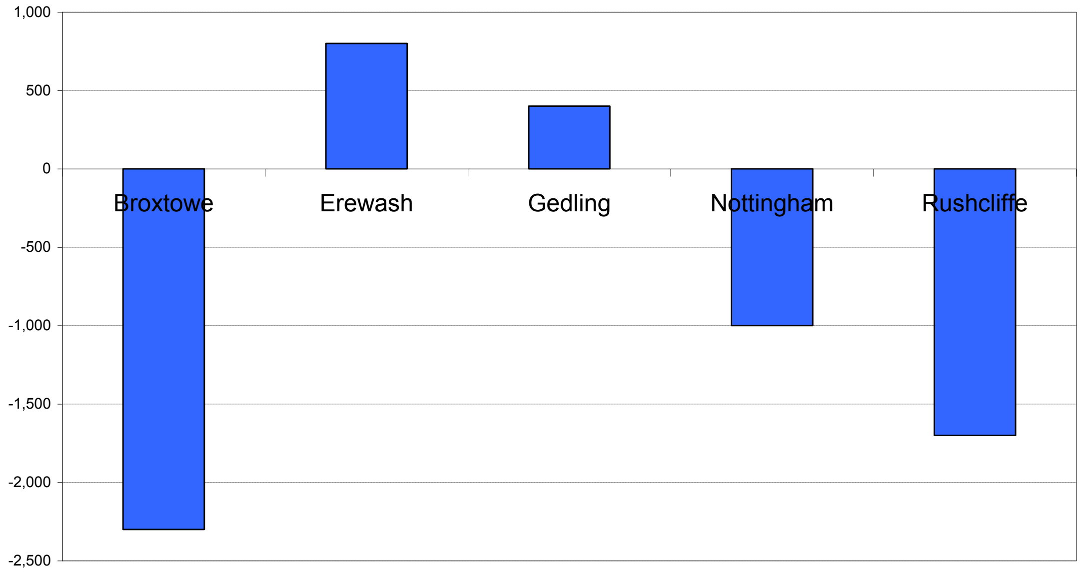


Table 1: Comparison of 2011 Census with ONS 2010 Mid-Year Estimates and Indicative Revised Estimates					
	2011 Census (rounded)*	**2010 MYE****	**2010 Indicative Estimates*****	**Change between the 2001 and 2011 Censuses**	
				No.	**%**
Broxtowe	109,500	111,800	111,400	1,900	1.8
Erewash	112,100	111,300	111,500	2,000	1.8
Gedling	113,600	113,200	113,600	1,700	1.5
Nottingham	305,700	306,700	301,000	38,700	14.5
Rushcliffe	111,100	112,800	112,600	5,500	5.2
Greater Nottingham	751,900	755,800	750,100	49,900	7.1

* as published July 2012
** as published June 2011
*** as published January 2012
The rounded Census figures have been used because the MYEs are published rounded.

4.5 It can be seen from this that the population of Broxtowe and Rushcliffe is significantly less than previously estimated, whereas the Census figures for Erewash and Gedling are close to the estimates. Nottingham's figure is lower than the MYE but higher than the Indicative Estimates[10].

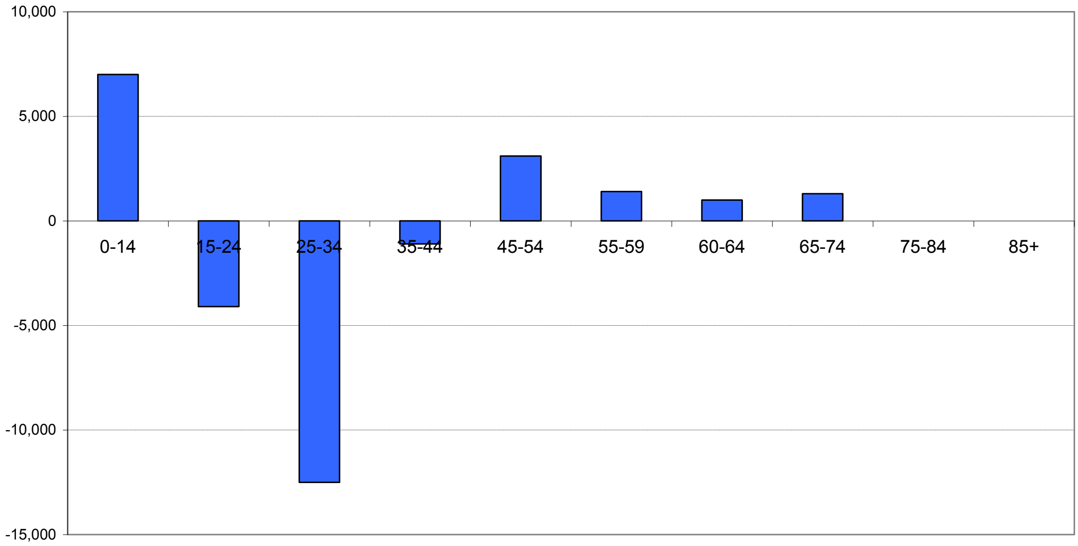
4.6 With regard to projections, just because the base-population is lower it does not necessary follow that the projected increase in population will also be lower, because the age-structure and assumptions about birth and death rates and migration are also important. To illustrate this, the ONS 2010-based trend-based

[10] Like most other large cities, Nottingham is particularly affected by ONS's revised method of allocating migrants, because of the large influx of international migrants and students to the City. Revised 2010 MYEs consistent with the Census are not yet available, but, allowing for probable in-migration and the excess of births over deaths, Nottingham's figure is likely to be close to the Indicative Estimate.

population projections, which were based upon the 2010 Indicative Estimates, showed an increase of 51,100 in the City between 2010 and 2026, even though the 2008-based projections (which had a projected 2010 figure of 306,100, i.e. 5,100 higher than the Indicative Estimates) had a lower increase of 49,400.

4.7 As well as the total population, therefore, it is important to compare the Census and MYE figures by age[11.] This comparison is shown in Figure 2 and Table 2, using the age-groups employed by the household projections.

Figure 2: 2011 Census population minus the 2010 Mid-Year Estimates by age Greater Nottingham



4.8 This shows that just looking at the total population masks some important changes by age-group. In particular, the number of people aged 15 to 34 has been significantly over-estimated in the main student areas – hence ONS's need to change their methodology for allocating migration in the MYEs. The implication is that net migration into the area amongst this age-group is lower than ONS have previously assumed in their estimates and projections.

4.9 The other main points are that the number of children aged under 15 has been under-estimated in all districts except Rushcliffe and there are more people aged 45 to 64 in Nottingham than previous estimated.

4.10 These changes by age will have an effect on the projections, but it is not possible to say what this will be until new projections are produced by ONS in 2014.

[11] A comparison could also be made by sex, but this is not likely to have a significant effect, so it has not been made in this chapter.

Table 2: 2011 Census and 2010 Mid-Year Estimates by age (using household projection age-groups)

	0-14	15-24	25-34	35-44	45-54	55-59	60-64	65-74	75-84	85+	Total pop
Census minus 2010 MYE											
Broxtowe	1,000	-1,100	-2,300	-500	300	100	100	300	-100	100	-2,300
Erewash	200	100	100	-500	800	-100	-100	200	100	-100	800
Gedling	800	-200	-100	-200	300	100	100	-100	-200	-200	400
Nottingham	5,000	-2,100	-9,100	600	1,700	1,200	900	500	100	200	-1,000
Rushcliffe	0	-800	-1,100	-500	0	100	0	400	100	0	-1,700
Greater Nottingham	7,000	-4,100	-12,500	-1,100	3,100	1,400	1,000	1,300	0	0	-3,800
2011 Census											
Broxtowe	17,400	13,200	13,100	15,600	16,000	6,700	7,600	10,700	6,700	2,700	109,500
Erewash	18,600	13,700	12,900	16,400	16,600	6,600	7,200	10,700	6,700	2,600	112,100
Gedling	19,100	12,800	12,800	16,000	16,800	7,300	7,800	11,100	7,100	2,700	113,600
Nottingham	52,300	69,900	48,600	39,000	34,300	13,400	12,600	17,500	12,900	5,100	305,700
Rushcliffe	19,200	12,800	11,500	16,000	16,700	7,000	7,400	10,600	7,000	2,800	111,100
Greater Nottingham	126,600	122,400	98,900	103,000	100,400	41,000	42,600	60,600	40,400	15,900	752,000
2010 MYE											
Broxtowe	16,400	14,300	15,400	16,100	15,700	6,600	7,500	10,400	6,800	2,600	111,800
Erewash	18,400	13,600	12,800	16,900	15,800	6,700	7,300	10,500	6,600	2,700	111,300
Gedling	18,300	13,000	12,900	16,200	16,500	7,200	7,700	11,200	7,300	2,900	113,200
Nottingham	47,300	72,000	57,700	38,400	32,600	12,200	11,700	17,000	12,800	4,900	306,700
Rushcliffe	19,200	13,600	12,600	16,500	16,700	6,900	7,400	10,200	6,900	2,800	112,800
Greater Nottingham	119,600	126,500	111,400	104,100	97,300	39,600	41,600	59,300	40,400	15,900	755,800

The rounded Census figures have been used because the MYEs are published rounded. Some figures do not sum correctly due to rounding.
Source: Office for National Statistics

People not living in households

4.11 The number of people not living in households is important to the projections because they are subtracted from the total population before household headship rates[12] are applied. The projection model currently takes the percentage of people in each age-group who were not in households in the 2001 Census and applies it to the projected numbers of people by age in the future, to allow for future changes in the age-structure.

4.12 Table 3 shows that the communal population (people not living in households) has changed little since 2001, except in Nottingham and Rushcliffe. This data is not yet available by age, but it is very likely that the increases in these districts are due to new purpose-built student housing[13] (at the University of Nottingham's Sutton Bonington Campus in the case of Rushcliffe).

Table 3: People in communal establishments

	2001	2011	Change
Broxtowe	947	917	-30
Erewash	1,050	1,142	92
Gedling	946	784	-162
Nottingham	8,978	15,942	6,964
Rushcliffe	1,729	2,325	596
Greater Nottingham	13,650	21,110	7,460

Households

4.13 The final dwelling-based projections which were used for the Core Strategies had "rescaled" headship rates for Broxtowe, Nottingham and Rushcliffe, because the number of households estimated for those districts in 2008 to 2010 using 2001 Census, housing completions and council tax data was seen to be much lower than resulted from using the Department for Communities and Local Government (CLG) headship rates[14] in the projections. The same was not found to be true for Erewash and Gedling. The 2011 Census figures for households give an opportunity to see if this rescaling was reasonable.

4.14 In order to make this comparison, the CLG headship rates for 2011 have been applied to the Census household population (i.e. the total population minus those not in households[15]) and the resulting numbers of households compared with the Census household numbers. The

[12] A headship rate is the proportion of people in each age-group who "head" a household.

[13] Although modern cluster-flats and studios are included as dwellings for council tax and some planning purposes (including the New Homes Bonus), for census purposes they are counted as communal establishments rather than separate dwellings. See Chapter 4 for further information about this.

[14] The headship rates used by CLG in their 2008-based household projections.

[15] In order to do this, it has been assumed that all of the increase in the communal population in Nottingham and Rushcliffe is in the 15 to 24 age-group.

same has also been done for the rescaled headship rates used in the Core Strategies projections. Figure 3 and Table 4 show these comparisons. Note that Figure 3 has the 2011 Census as equal to 100, so that a comparison can be made between the districts.

Figure 3: 2011 Households - comparison between 2011 Census, projections using CLG headship rates and Core Strategy headship rates

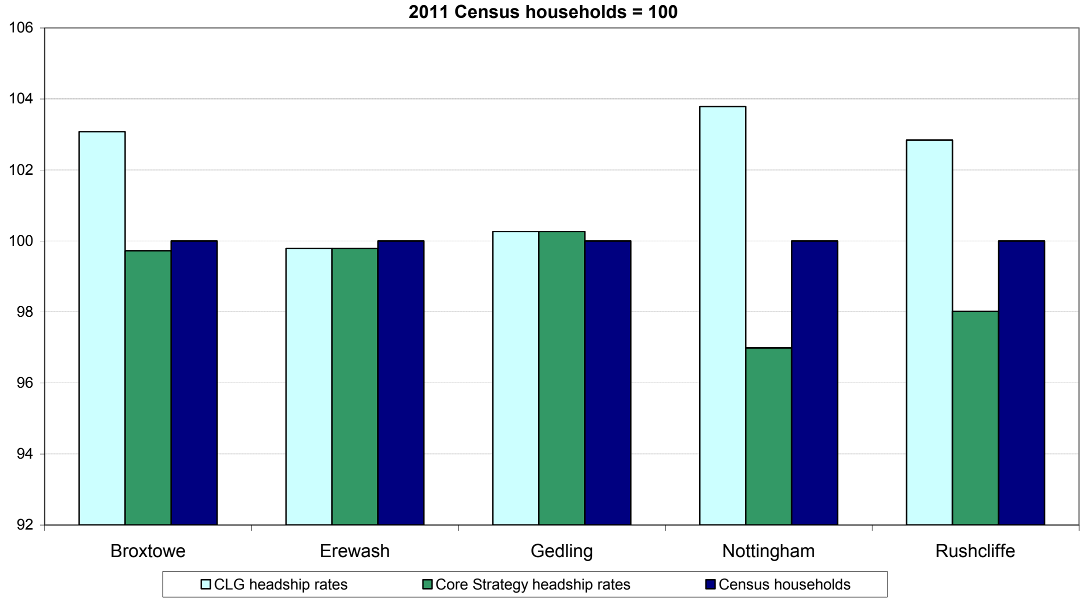


Table 4: Comparison of 2011 Census households with applying different headship rates to the 2011 Census household population			
	2011 Census	Using the CLG headship rates	Using the Core Strategy headship rates*
Broxtowe	46,820	48,260	46,690
Erewash	48,692	48,588	48,588
Gedling	49,349	49,479	49,479
Nottingham	126,131	130,906	122,331
Rushcliffe	45,835	47,137	44,926
Greater Nottingham	316,827	324,370	312,014

* Rescaled (fixed all years) headship rates for Broxtowe, Nottingham and Rushcliffe and CLG headship rates for Erewash and Gedling.

4.15 It can be seen from this that the Census households for Broxtowe are close to the estimates using the rescaled headship rates and those in Erewash and Gedling are close to the CLG headship rates. The approach taken by the Core Strategies projections in these districts is, therefore, supported by the Census figures.

4.16 In Nottingham and Rushcliffe, the Census figure is between the CLG and rescaled headship rate projections. In both cases it is substantially below the CLG headship rate figure and nearer to the estimates using the rescaled headship rates, which means that the case for not taking the CLG rates unamended is supported. It seems, however, that the rescaling was rather overdone. The reasons for this are likely to be because the population figures which were used in the rescaling were higher than the Census figures and the rescaling was consequently greater than it should have been. As well as the difference between the 2010 MYEs and the Census total population having an effect, the communal population is also greater in the City than assumed in the projections. The projections have a communal population of 9,100 in 2011 compared with 15,900 in the Census.

Comparison with the projections used in the former Regional Plan

4.17 Although abolished, the Regional Plan was part of the Development Plan for most of the preparation period of the Core Strategies in Greater Nottingham, so it is worth making the comparison with the projections which formed the basis of the Regional Strategy's housing figures which most of the Core Strategies adopt. The ONS/CLG original 2004-based population and household projections[16] for Greater Nottingham as a whole were used for this purpose, although the distribution between the districts was different to the projections.

4.18 The census population in Greater Nottingham (752,000) is much higher than the 2011 figure projected in the 2004-based projections (725,700). This is probably largely because of the growth in the number of students and international migration, which were not allowed for in the trend-based projections. Most of the difference is in Nottingham City, where the Census figure is 25,700 higher than the projected figure.

4.19 On the other hand, the census number of households in Greater Nottingham (316,800) is much lower than in the projections (326,000). Although some of this difference in the trends in population and households is explained by the increase in the communal population mentioned above, it is further confirmation that the headship rates projected by CLG for 2011 are too high.

The effect on the Core Strategy projections

4.20 The Core Strategy projections were dwelling-based, looking at the population implications of the Core Strategies' housing figures. Two key aspects which were picked out in the Household Projections Background Paper (HPBP) were the annual net migration and the change in the number of economically active people (as this helps assess if the Strategies' economic and housing policies are compatible[17]). It is not possible to be precise about what the effects of the Census population and households are on these, but approximations can be made.

[16] ONS 2004-based Sub-national population projections (May 2006) and CLG 2004-based household projections (March 2007). Because these were superseded by Revised 2004-based projections, they are no longer available on the ONS/CLG websites.
[17] See the Employment Background Paper for more information about this assessment.

4.21 Table 4 of the HPBP gives migration from the projections using both the Rescaled headship rates and the CLG headship rates. The migration using the Rescaled rates can be taken as still being reasonable for Broxtowe (see above) and the CLG rate migration is still appropriate for Erewash and Gedling.

4.22 Future levels of migration in the projections are related to the total population, as migration is a residual after adding births and subtracting deaths. The total population is related to the number of households, so it is reasonable to assume, in the absence of any more detailed data, that the migration in projections allowing for the Census data would be between the Rescaled and CLG headship rate-based projections in Nottingham and Rushcliffe. Table 5 shows what the net migration would be if it was the same proportional distance between the migration implied by the Rescaled and CLG headship rate projections as the Census households are between the projected 2011 households in those two projections.

4.23 The resulting annual net migration implied for Greater Nottingham is 848 per annum between 2011 and 2028 or about 14,400 in total over the whole period. This is obviously less than the 1,222 per annum in the HPBP, but it is nevertheless significant and shows the area is still intending to fulfil its role as a regional centre.

Table 5: Net migration (annual average) 2011 to 2028

	Pro-rata estimate	*Rescaled (Fixed all years) headship rates*	*Using CLG headship rates*
Broxtowe	300	*308*	*194*
Erewash	237	*237*	*237*
Gedling	540	*540*	*540*
Nottingham	-1,117	*-811*	*-1,507*
Rushcliffe	887	*948*	*795*
Plan Area	-277	*37*	*-773*
Greater Nottingham	848	*1,222*	*259*

** Same proportional distance between Fixed all years and CLG as 2011 Census households are.*

4.24 The same method can be used with the economically active population (see Table 6), although as it is very affected by changes to the age-structure of the future population, which cannot yet be known, the conclusions about it are more tentative.

Table 6: Change in economically active people (aged 16+) 2011 to 2028			
	Pro-rata estimate	*Rescaled (Fixed all years) headship rates*	*Using CLG headship rates*
Broxtowe	-278	*-186*	*-1,497*
Erewash	-1,284	*-1,284*	*-1,284*
Gedling	875	*875*	*875*
Nottingham	7,924	*11,553*	*3,295*
Rushcliffe	4,635	*5,309*	*3,605*
Plan Area	8,521	*12,242*	*2,673*
Greater Nottingham	11,872	*16,267*	*4,994*
** Same proportional distance between Fixed all years and CLG as 2011 Census households are.*			

4.25 Using this method, the increase in the economically active population is estimated to be about 11,900 between 2011 and 2028. This will obviously affect the comparison between the labour supply and demand in the Employment Background Paper, as it is a 4,400 lower increase than previously forecast. However, it is thought that some other aspects, such as the impact of changes in the retirement age, may have been under-estimated. This is examined further in Chapter 6.

Compensating for the effects of the Census figures

4.26 As stated above, about 384 more net in-migration would be needed each year between 2011 and 2028 to return the total figure for the period to the level set out in the Household Projections Background Paper. The extra dwellings to meet these shortfalls can be calculated. It is the Aligned Core Strategies authorities' contention that this shortfall should be made up in Rushcliffe, because it unilaterally decided to reduce its housing provision figure, resulting in a shortfall against the objectively assessed housing needs of the area.

4.27 Using Rushcliffe's 2028 average household size from the Core Strategy forecasts (2.32) and a 3% vacancy rate, 2,829 more dwellings would be required to make up the migration shortfall. Allowing for the shorter time-period of the Rushcliffe Core Strategy, this equates, pro rata, to 2,496 between 2011 and 2026. However, as stated on page 24 of the Core Strategies Forecasts Paper[18], Rushcliffe's housing figure was increased by 350 between the draft version used for the forecasts and the Publication Version. The figure has been increased by a further 200 in

[18] See http://www.nottinghamcity.gov.uk/CHttpHandler.ashx?id=36663&p=0

the Submission Version[19]. Subtracting these additions means that the housing provision in the Submission Version (2011 to 2026) would need to be increased by 1,946 to meet the migration shortfall. This would give a total dwelling requirement in Rushcliffe (2011 to 2026) of 11,546. It should be noted that this is still less than the former Regional Plan's figure of 13,417 excluding completions 2006 to 2011.

4.28 A similar method could be used for the economically active population which would give a higher dwelling requirement, but due to the tentative nature of the calculations (see para. 4.24) and the further work on economic activity rates (see Chapter 6), it is not considered that the evidence for this is sufficiently robust.

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Future 2011 Census data and ONS/CLG projections

4.29 Although some more detailed Census data are now available, the publication of cross-tabulations such as the communal population by age and headship rates by age will not start until later in May. Projections of the population and headship rates taking account of this data will not be available until new (2012-based) projections are published by ONS/CLG[20] in 2014.

4.30 ONS published Interim 2011-based population projections on 28th September 2012[21.] It is important to note that the main purpose of these projections was to aid CLG in the next round of local authority financial settlements. In particular, they only take account of the 2011 Census data which has been published so far and are not the result of a full demographic analysis. This means that there are some anomalous results which the representatives of local authority demographers and others have raised with ONS. In addition, they only go up to 2021 and, as with all official projections, they are trend-based. These factors mean that they are not of use in assessing the Core Strategy housing figures.

4.31 CLG have also published Interim 2011-based household projections. It is important to note that these do not take full account of the results of the 2011 Census. Also, they are trend-based, so will have the same weaknesses, in terms of their use for the Core Strategies, as previous official projections. Nevertheless, they provide further support for the approach taken towards headship rates by the Core Strategies projections. See Chapter 5 for further information about this.

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[19] See http://corestrategy.rushcliffe.gov.uk/media/CoreStrategy/Documents/ProposedModifications/PM02_Proposed%20Mods_illustration%20of%20changes%20to%20CS.pdf

[20] ONS population projections and CLG household projections.

[21] See http://www.ons.gov.uk/ons/rel/snpp/sub-national-population-projections/Interim-2011-based/stb-2011-based-snpp.html

Conclusions

4.32 The following conclusions about the Core Strategies projections are reasonable given the Census data received so far and the analysis which it is possible to do:

- The Census data supports the Greater Nottingham authorities' view that headship rates in Broxtowe, Nottingham and Rushcliffe have grown more slowly since 2001 than in the CLG projections and the rescaling of the headship rates for these districts but not Erewash and Gedling.
- Estimates taking account of the 2011 Census suggest that there would still be significant in-migration to Greater Nottingham, albeit at lower levels than shown in the Household Projections Background Paper.
- There would still be significant growth in the economically active population. This will also be affected by the further work on the effect of changes to the state retirement age and other non-demographic factors (see Chapter 6).
- A Housing Market Area wide increase in housing provision of 2,829 (2011 to 2028) over what was included in the Core Strategy projections would bring the migration back into line with that described in the Household Projections Background Paper. Applying this increase to the Rushcliffe Core Strategy would bring its housing provision to 11,550 (2011 to 2026). The view of the Councils[22] is that by taking a locally determined approach to housing provision, Rushcliffe Borough has not met its Duty to Cooperate and, as such, any uplift in housing numbers should apply only to the Rushcliffe Core Strategy.

4.33 Taking the above into account, the objectively assessed housing need of the HMA, taking account of the economic aspirations of the Core Strategies, is 49,950 between 2011 and 2028 – 47,124 in the Core Strategies projections plus 2,829 due the Census results (rounded). Table 7 (see the next page) shows how the Aligned Core Strategies authorities consider that this should be met.

4.34 So far as 2011 to 2026 is concerned, the Housing Background Paper (paras 5.4 to 5.11) identified the need as being 41,610. To this can be added 2,496 due to Census (see para. 3.27 above), to give a revised 2011 to 2026 housing need of 44,100 (rounded).

[22] See Statement of Compliance with the Duty to Cooperate (2013) for further details (once published)

Table 7: Objectively Assessed Housing Need - 2011 to 2028 and Core Strategies provision

		Need	Core Strategy provision	With revised Rushcliffe provision to 2026	
Core Strategies forecasts (May 2012)		47,124			*see reference below**
Additional following initial Census results		2,829			*see paragraph 3.27*
Broxtowe			6,150	6,150	
Erewash			6,250	6,250	
Gedling			7,250	7,250	
Nottingham			17,150	17,150	
Rushcliffe	Submission Version (to 2026)		9,600	9,600	*inc. proposed change of 200*
	Assumed 2026-28 at Core Strategy SV rate**			1,280	
	Extra required 2011-26 due to Census			1,946	*see paragraph 3.27*
	Assumed extra 2026-28 due to Census**			333	*see paragraph 3.27*
	Total to 2028 (rounded)			13,150	
HMA Total		**49,950**	**46,400**	**49,950**	

* "Forecasts of population and households for Nottinghamshire and Derbyshire authorities controlled to new dwelling figures - Information for the Greater Nottingham Districts (Nottingham Core Housing Market Area)", May 2012.
** Note that the Rushcliffe Core Strategy does not say anything about the period beyond 2026. These assumptions are necessary in order to be able calculate HMA figures to 2028 and should be used solely for that purpose.

5. The CLG Interim 2011-based household projections and the Nottingham Core HMA Core Strategies

Introduction

5.1 The Department for Communities and Local Government (CLG) published their Interim 2011-based household projections on 9th April 2013. The report covering the projections[23] says that they replace CLG's 2008-based household projections and that they are of use for the assessment of future housing requirements as required by the National Planning Policy Framework (NPPF).

5.2 When considering the implications of these projections for the Core Strategies, it is important to remember that they are interim, as they only take account of the initial 2011 Census data, and also that, like all official projections, they are trend-based, taking no account of planning policies or the capacity for new housing. Nevertheless, some important conclusions can be drawn from them.

Summary conclusion

5.3 Although they are only interim, the latest CLG projections provide strong evidence that the approach taken by the HMA authorities to reduce the household headships[24] in Broxtowe, Nottingham and Rushcliffe in the Core Strategies projections was justified. This bears out the conclusion which had already been made from looking at the 2011 initial Census data, which is contained in the Aligned Core Strategies Housing Background Paper Addendum Interim Version (February 2013).

5.4 The lower headship rates indicated by the Census could be due to a number of factors. There is good evidence that an important factor in Broxtowe, Nottingham and Rushcliffe is demographic changes, in particular the increased number of students and international migrants, not just the effects of the housing market.

Why are the projections "Interim"?

5.5 So far, Census data only gives household information for the total population in each area, not by age and sex. This means that a full update of the headship rate projections cannot yet be done. All that CLG have been able to do is to adjust the previous projected headship rates so that they give a 2011 household total which is consistent with the 2011 Census when applied to the ONS 2011 Mid-Year Estimates.

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[23] See https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/190229/Stats_Release_2011FINALDRAFTv3.pdf

[24] The proportion of people in each age-group that "head" a household.

5.6 Also, ONS do not yet have detailed enough data from the Census to be able to fully update the inputs necessary for their population projections (which are used in the household projections) such as migration, fertility and mortality rates. Because of this, the 2011-based population projections, which were published in September 2012, are also interim and they, like the household projections, only go up to 2021, not the usual 20 years into the future.

5.7 The first official projections making use of the full 2011 Census data will be the 2012-based population and household projections, which are due to be published in 2014.

Comparison with the Core Strategies projections

5.8 Household projections estimate the number of households by applying headship rates to the household population (the total population minus those living in communal establishments such as student halls for residence and residential homes). For the purposes of comparing the effects upon the housing need it is the increase in the number of households which is important. The housing need is derived by applying an allowance for vacant dwellings (generally of about 3%) to the household increase.

5.9 It is not possible to easily compare headship rates between projections, as the rates for some age-groups may be going up whilst others are going down. The best summary comparison which can be made is of the average household size, as, all other things being equal, if headship rates for a given population are higher (resulting in more households) the average household size will be lower.

5.10 Table 1 compares the household increase between 2011 and 2021 in the latest projections with the Core Strategies (CS) projections and also the previous (2008-based) official projections and Table 2 compares the population increase and change in average household size.

5.11 It can be seen from the Tables 8 and 9 that although the Interim projections have a greater increase in the household population[25] between 2011 and 2021 than the CS projections for the HMA (51,700 compared with 39,800) the projected increase in households is practically the same in both projections (26,900). The result of this is that the projected decline in the average household size is only 0.03, compared with 0.07 in the CS projections.

[25] The household population is quoted (i.e. excluding those living in communal establishments such as student halls for residence). This is the population to which the headship rates are applied, so it enables an average household size to be calculated. The comparison for the total population is similar.

5.12 If the CS projections (as set out in the Housing Projections Background Paper 2012) had estimated the 2011 households correctly as the basis for its headship rate work, the average household size in the Interim and CS projections for 2011 should be similar. They are similar for Broxtowe, Erewash and Gedling, but are further apart for Nottingham and Rushcliffe. The latter is probably mainly due to the big increase in students in halls of residence not being allowed for in the CS projections, as explained and accounted for in the Housing Background Paper Addendum Interim Version.

5.13 The projected household increase in the Interim projections between 2011 and 2021 is also about one-third lower than in the previous (2008-based) CLG projections (26,700 compared with 39,700). The projected increase in the household population is, however, only 18% lower (51,700 compared with 62,800). This reflects the fact that headship rates are generally lower in the new projections.

5.14 The change in average household size at the HMA level is very similar in the CS and 2008-based projections, so the comparison between them and the Interim projections is similar, i.e. the reduction in the Interim projections is 0.03 between 2011 and 2021 compared with 0.07 in the CS and 2008-based projections.

5.15 It may seem paradoxical that the decline in the average household size in the CS projections is the same as in the 2008-based projections, despite the lower headship rates used in the former. The reason is that average household size is also affected by the age-structure of the population, with younger people tending to have a higher average household size than older people. As the CS projections assume lower net in-migration than the official projections and migrants tend to be younger, the population is older in them and the average household size is, therefore, reduced compared with the official projections. This particularly affects Broxtowe, where the decline in average household size between 2011 and 2021 in the CS projections (0.11) is actually greater than in the 2008-based projections (0.07), despite lower headship rates having been used.

Reasons for the lower than projected headship rates

5.16 It may be argued that the reason for headship rates in the 2011 Census being lower than previously projected is the current state of the housing market, which means that many people who would like to form their own households cannot afford mortgages or obtain rented housing. It is clear, however, that demographic changes are a key factor, particularly in Broxtowe, Nottingham and Rushcliffe.

5.17 As explained in the Household Projections Background Paper (June 2012), it is in these three districts that the difference between the headship rates is most different from what was projected in the CLG 2008-based household projections. This conclusion is supported by examining the 2011 Census (see Table 4 in Chapter 4 and associated commentary).

5.18 If the lower headship rates were entirely due to the housing market, the reduced headship rates would be found equally across all of the districts in the HMA. In particular, Gedling and, to a lesser extent, Erewash have a similar socio-economic make-up to Broxtowe[26,] so it would be expected that they would have similarly reduced headship rates compared to what was projected in the CLG 2008-based projections, but they do not.

5.19 This is illustrated in Table 4 of this paper, where the headship rates projected by the CLG 2008-based projections for 2011 are applied to the Census household population by age. If the 2008-based projected headship rates were borne out by the Census, the total number of households produced from these calculations (in the 2nd column) would equal the number of households in the Census (1st column). In fact, although there is less than 200 difference in Erewash and Gedling, the Broxtowe figure is 1,400 lower in the Census than using the projected rates.

5.20 The different performance between the districts is probably due to the increased number of university students and international migration. These two groups tend to live in larger households and this is reflected in the lower headship rates.

5.21 Between 2001 and 2011 there was an increase of about 14,800[27] in the number of full-time students at the University of Nottingham and Nottingham Trent University. During the same period, there was an increase of about 6,000 bedspaces in halls of residence[28], meaning that the number of students living as households in the general housing stock rose by around 8,000 students. The vast majority of these live in Nottingham, Broxtowe and Rushcliffe.

5.22 In addition, the increased number of international migrants, particularly coming to Nottingham, will have had an effect upon headship rates. Information consistent with the 2011 Census is not yet available, but, by way of illustration, the ONS 2010 Mid-Year Estimates showed net international migration to the City of 32,000 between 2003 and 2010[29].

5.23 These changes to the headship rate trends due to demographic changes mean that it is reasonable to assume that they are permanent changes, not just temporary changes which will be rectified when the housing market improves.

[26] See, for instance, ONS's 2001 Census Local Authority Area Classification http://www.ons.gov.uk/ons/guide-method/geography/products/area-classifications/ns-area-classifications/index/datasets/local-authorities/index.html
[27] Information supplied to the City Council by the two universities.
[28] Nottingham City Council planning data.
[29] ONS 2010 Mid-Year Estimates components of change, with revisions to previous years' data. Note that there will be some double-counting with the increase in student numbers, as this include international students.

Table 8: Comparison of households in the CLG Interim 2011-based household projections with the Core Strategy and 2008-based projections

	CLG/ONS Interim 2011-based			Core Strategy projections			CLG/ONS 2008-based		
	2011	**2021**	**Change**	**2011**	**2021**	**Change**	**2011**	**2021**	**Change**
Households									
Broxtowe	46,907	51,051	4,144	47,727	51,258	3,531	49,948	56,134	6,186
Erewash	48,733	51,821	3,088	48,520	52,101	3,581	48,535	52,658	4,123
Gedling	49,408	52,982	3,574	49,819	53,976	4,157	49,956	54,704	4,748
Nottingham	125,703	137,130	11,427	126,447	136,244	9,797	136,027	154,802	18,775
Rushcliffe*	45,856	50,492	4,636	45,968	51,844	5,876	48,074	53,971	5,897
Nottm Core HMA	**316,607**	**343,476**	**26,869**	**318,481**	**345,423**	**26,942**	**332,540**	**372,269**	**39,729**

* Rushcliffe CS projection figures have not been adjusted to allow for the increased Core Strategy housing figure since the projections were prepared.

Note that although the figures are shown unrounded they are not accurate to that level and should be rounded to the nearest 100 before being quoted.

Sources (Tables 1 and 2):

CLG/ONS Interim 2011-based projections – "Detailed data for modelling and analytical purposes"
https://www.gov.uk/government/statistical-data-sets/detailed-data-for-modelling-and-analytical-purposes.

Core Strategy projections – Rescaled Fixed All Years projections from "Forecasts of population and households for Nottinghamshire and Derbyshire authorities controlled to new dwelling figures – Information for the Greater Nottingham Districts (Nottingham Core Housing Market Area)", May 2012
http://www.nottinghamcity.gov.uk/CHttpHandler.ashx?id=36663&p=0.

CLG/ONS 2008-based projections – Sub-national Population Projections (SNPP) scenario figures from "Forecasts of population and households for Nottinghamshire and Derbyshire authorities – Greater Nottingham", February 2011
http://www.nottinghamcity.gov.uk/CHttpHandler.ashx?id=36664&p=0.

The household population figures from the last two projections are from unpublished data output provided by Derbyshire County Council.

The average household size is the household population divided by the number of households

Table 9: Comparison of population figures used in the CLG Interim 2011-based household projections with the Core Strategy and 2008-based projections

	CLG/ONS Interim 2011-based			Core Strategy projections			CLG/ONS 2008-based			
	2011	**2021**	**Change**	**2011**	**2021**	**Change**	**2011**	**2021**	**Change**	
Total population										
Broxtowe	109,749	118,129	8,380	111,680	114,680	3,000	113,460	123,260	9,800	
Erewash	112,249	117,289	5,040	111,320	114,660	3,340	111,180	116,020	4,840	
Gedling	113,741	120,636	6,895	113,610	119,780	6,170	113,750	122,010	8,260	
Nottingham	303,899	326,311	22,412	306,870	324,230	17,360	310,450	340,580	30,130	
Rushcliffe*	111,248	121,079	9,831	114,060	125,020	10,960	113,410	123,140	9,730	
Nottm Core HMA	**750,886**	**803,444**	**52,558**	**757,540**	**798,370**	**40,830**	**762,250**	**825,010**	**62,760**	
Household population (i.e. excluding those not living in households, e.g. student halls of residence)										
Broxtowe	108,773	117,004	8,232	110,625	113,388	2,762	112,402	122,198	9,796	
Erewash	111,032	115,848	4,816	110,163	113,330	3,167	110,025	114,865	4,840	
Gedling	112,894	119,592	6,699	112,514	118,437	5,923	112,657	120,920	8,263	
Nottingham	288,754	311,193	22,439	297,812	315,187	17,375	301,389	331,525	30,137	
Rushcliffe*	108,851	118,337	9,487	111,590	122,170	10,580	110,938	120,670	9,732	
Nottm Core HMA	**730,303**	**781,974**	**51,672**	**742,705**	**782,512**	**39,807**	**747,410**	**810,178**	**62,768**	
Average household size										
Broxtowe	2.32	2.29	-0.03	2.32	2.21	-0.11	2.25	2.18	-0.07	**
Erewash	2.28	2.24	-0.04	2.27	2.18	-0.10	2.27	2.18	-0.09	
Gedling	2.28	2.26	-0.03	2.26	2.19	-0.06	2.26	2.21	-0.04	
Nottingham	2.30	2.27	-0.03	2.36	2.31	-0.04	2.22	2.14	-0.07	
Rushcliffe*	2.37	2.34	-0.03	2.43	2.36	-0.07	2.31	2.24	-0.07	
Nottm Core HMA	**2.31**	**2.28**	**-0.03**	**2.33**	**2.27**	**-0.07**	**2.25**	**2.18**	**-0.07**	**

* Rushcliffe CS projection figures have not been adjusted to allow for the increased Core Strategy housing figure since the projections were prepared.

** The apparent anomaly of the Core Strategy average household size in Broxtowe falling more quickly than the 2008-based projections is probably due to the assumed lower levels of in-migration and, therefore, fewer younger people, who tend to have a larger average household size moving into the area, i.e. it is due to the age-structure, not higher headship rates for people of particular ages. This factor should also be borne in mind when looking at the figures for the other districts and the HMA as a whole.

See page 5 for sources and other notes.

6. Further work on economic activity rates

Background

6.1 Section B of the Core Strategies Employment Background Paper (EBP)[30] compared the future number of economically active people implied by the housing provision policies (the labour supply) with updated estimates of future jobs. This estimated that, in the Core Strategies population forecasts with constant economic activity and unemployment rates, the increase in the labour supply was about 18,500 less than the job growth. It concluded, however, that factors such as changes in retirement ages and policies to increase the economic activity rate and reduce the unemployment rate locally would be sufficient to make up for this shortfall.

6.2 Although the finding is very tentative, the initial 2011 Census data suggests that the growth in the economically active population may be about 4,400 lower than in the Core Strategy projections (see para. 3.24 above), resulting in an increase in the shortfall between the labour supply and jobs growth of 22,900 without increased economic activity and employment rates. Although, being very tentative, this does not necessarily invalidate the conclusion in the EBP, it is worth looking at whether there have been any other developments since the EBP was prepared.

Calculations

6.3 One important factor looked at in the EBP was the effect of the increase in the State Pension Age on the economic activity rates of people aged 60 and over. The basis for this was research published by Kent County Council in October 2011[31]. No further research has been published on this subject, so this data continues to be the best available.

6.4 One difference between the EBP and the Census analysis in Chapter 4 is that the former only looked at the economic activity of people aged 16 to 64, whereas the latter considered all people aged 16 and over, as do the labour force figures in the report on the Core Strategy forecasts[32]. The reason why the EBP only considered those aged 16 to 64 was that it was thought that this would compensate for the fact that the school-leaving age is increasing to 18 by 2015, something which was not allowed for in the forecasts. The economic activity rate of 16 and 17 year olds was, therefore, thought to be likely to fall.

6.5 Further examination shows, however, that any fall in the economic activity rate of 16 to 17 year olds will have less effect than the increase in the State Pension Age. The increase in the school-leaving age does not necessarily

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[30] See http://www.nottinghamcity.gov.uk/CHttpHandler.ashx?id=36312&p=0
[31] See "Technical Paper – Activity Rate projections to 2036", Kent County Council, October 2011 available at https://shareweb.kent.gov.uk/Documents/facts-and-figures/Economy/technical-paper-activity-rate-projections-to-2036.pdf.
[32] See http://www.nottinghamcity.gov.uk/CHttpHandler.ashx?id=36663&p=0

mean that many more 16 to 17 year olds will be in full-time education, as they will be allowed to be in apprenticeships and jobs with training. Those selecting these options are counted as being in employment and thus economically active[33]. It seems likely, therefore, that effect of the increased school-leaving on economic activity rates may not be as great as previously thought.

6.6 Unfortunately, economic activity rates for 16 and 17 years are not currently available, and will not be so until published from the 2011 Census in Spring 2013, so it is not possible to look at what the current situation is locally. The Core Strategy forecasts include them within the wider 16 to 19 age-group, the economic activity rate of which is strongly influenced by the number of university students in Greater Nottingham, so possible scenarios looking at them separately can only be done very crudely.

6.7 The Core Strategy forecasts show 19,400 16 and 17 year olds in Greater Nottingham in 2028 and the 2001 Census economic activity rate for that age-group was about 20% (excluding full-time students in part-time jobs). If, hypothetically, the increased school-leaving age led to a 5% fall in the economic activity rate to 15%, the resulting reduction in economically active people would, therefore, be about 1,000.

6.8 Including people aged 65 and over in the calculations makes a more significant difference. The EBP Table C.1 and para. 44 show an increase in the economically active population (2011 to 2028) of Greater Nottingham who are aged 16 to 64 of 13,500, with no increase in economic activity rates. If this calculation is repeated for all those aged 16+ (i.e. the figures on page 26 of the Core Strategy Forecasts Paper) the increase is about 16,300. If this figure had been used in the EBP calculations, the shortfall against the number of jobs would have been 15,700, not 18,500. Adding the 4,400 further shortfall implied by the Census figures (see Table 6) to this would give a total shortfall of 20,100, i.e. only 1,600 higher than in the EBP.

Conclusion

6.9 Given the tentative nature of the conclusions from the Census figures, this further analysis does not give sufficient reason to conclude that the findings of the EBP are no longer valid. It is, therefore, still reasonable to assume that factors such as changes in retirement ages and policies to increase the economic activity rate and reduce the unemployment rate locally would be sufficient to make up for the shortfall between the labour supply forecasts and the estimated number of jobs.

[33] See, for instance, 2001 Census Definitions page 32.

7. Justification for including purpose-built student accommodation in the Core Strategy housing figures

Introduction

7.1 In the past there has been some uncertainty about whether purpose-built student dwellings[34] (units) should be included in the monitoring of housing completions and the housing provision figures of spatial plans. This chapter provides a justification for Nottingham City Council's decision to include them in its Core Strategy and monitoring, and shows that this is consistent with current Department for Communities and Local Government (CLG) policy. It has not been an issue in the other Greater Nottingham districts, because no purpose-built student housing has been completed there since before 2006.

CLG definitions

7.2 The inclusion of student accommodation in SHLAA assessments has been subject to changing advice in recent years. In 2008, published CLG guidance[35] stated that:

"Communal establishments are not counted in overall housing supply i.e. establishments providing managed residential accommodation. These cover university and college student accommodation (including self-contained flats clustered into units with 4 to 6 bedrooms), hospital staff accommodation, hostels/homes, hotels/holiday complexes, defence establishments (not married quarters) and prisons."

7.3 However, the definitions were changed in 2009 and the current definition[36] now states that:

"Communal establishments, i.e. establishments providing managed residential accommodation, are not counted in overall housing supply. These cover university and college student, hospital staff accommodation, hostels/homes, hotels/holiday complexes, defence establishments (not married quarters) and prisons. ***However, purpose-built (separate) homes*** (e.g. ***self-contained flats clustered into units with 4 to 6 bedrooms for students) should be included. Each self-contained unit should be counted as a dwelling****."*

7.4 This is still a bit ambiguous, because it is not clear exactly what counts as "managed" accommodation, so the City Council asked CLG for clarification. The response which they received was that "local authorities should take a

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[34] Using the Census definition of a dwelling, which is "a self-contained unit of accommodation". Self-containment is where all the rooms (including kitchen, bathroom and toilet) in a household's accommodation are behind a single door which only that household can use.
[35] CLG (2008), Regional Spatial Strategy and Local Development Framework: Core Output Indicators – Update 2/2008
[36] CLG Definition of general housing terms: Dwelling
http://www.communities.gov.uk/housing/housingresearch/housingstatistics/definitiongeneral/

pragmatic view about what should and should not be included in the housing supply figures, looking at developments on a case by case basis"[37]. The Council took this as confirming their approach of including each self-contained student unit (cluster flat or studio flat[38]) as a separate dwelling in housing monitoring and back-dating their monitoring information to include them consistently back to 2001.

Ministerial statement (December 2011)

7.5 The situation has recently become clearer as the result of a parliamentary question to the Minister for Housing and Local Government on 5th December 2011[39]:

Mr Don Foster (Bath) (LD): *Modern, purpose-built student accommodation often resembles blocks of flats. It can reduce the need for ordinary family homes to be turned into houses in multiple occupation and, sometimes, mean that HMOs can be returned to family accommodation, so in future will councils be allowed to count such flats towards the delivery of their core-strategy housing targets?*

Grant Shapps: *My right hon. Friend asks an important question, and it is true that in the past housing built for students was not included in the old-fashioned targets, which led to the lowest house building since the 1920s. I am pleased to let him know that under our new system the answer is yes, they are included, and what is more they attract the new homes bonus as well.*

New Homes Bonus

7.6 One of the Coalition Government's main incentives to encourage housebuilding in local areas is the New Homes Bonus, the main element of which matches the council tax payable on each new property for a period of six years. The source which CLG use to assess the number of new homes is the change in the number of council tax properties. In order to provide consistency across the country, the designation of what is a new council tax property is carried about by the Valuation Office Agency (VOA).

7.7 The VOA counts each self-contained unit in a student hall of residence (cluster flat or studio flat) as a separate unit for council tax purposes. It is logical, therefore, that, as this is the definition which CLG use for the New Homes Bonus, the same definition should also be used for the spatial planning housing policies and their monitoring.

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[37] E-mail message from Trevor Steeples (CLG Housing Markets and Planning Analysis Division) to Graham Gardner (Nottingham City Council), 21st August 2009.

[38] A cluster flat is where students with their own rooms (which may or may not have their own bathroom and/or cooking facilities) share some facilities, with the whole flat being behind its own front door through which only the occupants have access. A studio flat is a self-contained study-bedroom with its own kitchen and bathroom facilities behind its own front door.

[39] House of Commons, *Monday 5 December 2011*, Oral Answers to Questions: Communities and Local Government.
http://www.publications.parliament.uk/pa/cm201011/cmhansrd/cm111205/debtext/111205-0001.htm

Students in population and household projections

7.8 In the past, there has sometimes been doubt as to whether population and household projections took students fully into account. Following the Office for National Statistics (ONS) efforts to improve their migration estimates[40], however, it is clear that students are now included. This means that it is reasonable for the dwelling figures resulting from the projections to also include student housing.

7.9 Some comments on the Publication Draft Core Strategy have said that separate forecasts should be made of the future student numbers and the need for purpose-built accommodation. It is not possible to do this, however, because the universities are not able to provide any indication of future numbers even in the short term. It must be likely, though, that, due to the changes in university finance, student numbers will not increase at anything like the same rate as they have in since 2001. This is one of the main reasons for the City Council's contention that the migration assumptions in the ONS projections, which are based upon past rates, are not realistic.

7.10 The CLG household projection methodology subtracts people in communal establishments (i.e. those not regarded as living in households) before applying headship rates[41] and projecting the number of households. Students in purpose-built accommodation (including both cluster and studio flats) are generally included in the communal population in the Census (what the Census refers to as being in "student halls of residence"). When projecting what the future number of people in communal establishments will be, the number is normally kept as either constant at the census number or constant at the census proportion of the people in an age-group. This is the only realistic thing to do, because, for similar reasons to those given in the last paragraph, there is no way of knowing how the number of students in halls of residence will change over the next 15 years or so, but it does lead to only a small increase in the communal population being projected.

7.11 In practice, as large new blocks of student flats are provided, the numbers of students living in them rise considerably. For this reason, the number of people living communally in the City, other than in medical and care establishments, rose from 6,612 to 14,140 between the 2001 and 2011 Censuses – an increase of 7,528 or 114%. Unfortunately, it is not yet possible to give the figures for student halls separately.

7.12 To allow for student flat developments in the future, it is necessary either to increase the communal population in the projections substantially, which would have the effect of reducing the number of households and, therefore, the dwelling need, or to include student housing in the housing provision. Because of the difficulties of knowing what the communal population might be

[40] The Migration Statistics Improvement Programme (IMPS) - see http://www.ons.gov.uk/ons/guide-method/method-quality/imps/background-to-imps/index.html

[41] The proportion of people in each age group who "head" a household.

in the future, it is more realistic to include student housing in the housing provision and to include it in the monitoring figures as it arises.

7.13 The exercise to "rescale" the headship rates to 2008 and 2010 household estimates detailed in Table 2 of the Household Projections Background Paper is consistent with this approach. This divides council estimates of the number of household by the number of households projected using the CLG headship rates to give a factor to apply to the CLG headship rates. The councils' estimates take the 2001 census households as their basis and add on the net dwelling change since then, including purpose-built student dwellings, and the projected households also include students in purpose-built flats developed since 2001, as the communal population was not increased from the 2001 Census figure.

7.14 The 2001 headship rates exclude students in halls of residence, as these were excluded from the Census. The use of 2001 Census households as the basis for the household estimates is consistent with this – i.e. the rescaling exercise and the Core Strategy forecasts both exclude halls of residence built before 2001 but include those built since.

7.15 It could be argued that students in halls of residence built since 2001 will have different headship rates to the total for all people aged 15 to 24, so including those in halls built since 2001 will affect the overall headship rate for that age-group. The CLG headship rate for this age-group in 2011 is about 0.25, whereas the headship rate of those in purpose-built flats developed since 2001 would be 0.43 - 2,510 flats (households) divided by 5,820 bedspaces (population). The difference this is likely to make to the calculations is, however, not very significant because the 5,820 students in these halls of residence only comprise about 9% of all people aged 15 to 24[42], so the headship rate for the total age-group would be much nearer to 0.25 than 0.43. Also, a higher headship rate at 2011 would produce more projected households, so the rescaling factor would actually be lower than in the Core Strategy forecasts.

7.16 Although, as stated in above, it is not possible to say what the change in the number of students in halls of residence is likely to be to 2028, the effect of removing them from the housing provision figures can be illustrated. The average number of students per flat built since 2001 is 2.32, so 431 fewer dwellings would be required for every 1,000 student bedspaces provided if this average size is continued. For example, if 6,000 new student bedspaces were provided between 2011 and 2028 (a similar number to that provided between 2001 and 2011), approximately 2,590 fewer dwellings would be required or a reduction of 152 per year on average[43]. These figures are only provided for illustrative purposes, because, as explained elsewhere in this chapter, the case for including student housing in the Core Strategy figures is very strong.

[42] This is of the 15 to 24 year old population living in households in 2011 in the Core Strategy projections.
[43] These figures assume that the total population remains as in the Core Strategy projections.

Providing an alternative to other housing

7.17 A longstanding priority of the City Council is to encourage students to live in appropriate purpose-built accommodation, so that the general housing stock in the main student areas is available for occupation by families. This means that the Council would like to see an increase in purpose-built student housing even if there is no increase in the number of students. The housing thus not taken by students would, therefore, be available to newly-forming households or those moving into the area. Consequently, providing extra student dwellings has the same net effect, in terms of meeting the needs of the increased number of households, as building new general housing. This is a further reason why it is reasonable to treat new student and general dwellings in the same way in the monitoring of housing development.

Including studio flats, not just cluster flats

7.18 It might be argued that studio flats are not really dwellings at all, but just similar to rooms in old-style halls of residence with en-suite catering and bathroom facilities. They do, however, provide self-contained accommodation, as is evidenced by the VOA regarding them as separate council tax properties. In addition to this, they are similar to, and in some cases larger, than some of the non-student flats completed in the city centre since 2001. It is reasonable, therefore, to assume that, if they were no longer needed for the student market, they could be let or sold to non-students and it is logical to include both studio flats and cluster flats in the housing monitoring.

Conclusions

7.19 The inclusion of purpose-built student housing in the Core Strategy provision figures is justified because:

- Current Government guidance is that such housing is included in Core Strategy targets.
- It is not possible to project the future number of students or the number of new student flats up to 2028, so they cannot be treated separately.
- The Core Strategy population and household forecasts include students in halls of residence, as far as is possible.

8. Affordable Housing update

Strategic Housing Market Assessment 2007

8.1 In accordance with the NPPF, the Aligned Core Strategies plan for the delivery of affordable housing to meet identified need.

8.2 Affordable housing need is assessed in the Nottingham Core Strategic Housing Market Assessment 2007, and subsequent updates[44]. The Strategic Housing Market Assessment; Affordable Housing Needs update 2009 identified the level of need for each authority based upon current and future projections and the development targets outlined in the former East Midlands Regional Plan. A further Affordable Needs update was undertaken in 2012. The need levels are estimated to be as follows:

Authority	Potential level of net affordable housing need per annum (2009 update)	Potential level of net affordable housing need per annum (2012 update)
Broxtowe	445	535
Gedling	396	301
Nottingham	289	444

Source: Nottingham Core Strategic Housing Market Assessment Needs Update 2009 and 2012
NB: The table above contains potential levels of affordable housing need and does not take into account viability considerations and other policy factors.

8.3 The 2012 update found increased levels of need in the Housing Market Area (albeit that need had declined in Gedling[45]). Advice from the author, B. Line, indicates that this change is largely due to the housing market conditions prevailing at the time, in particular the lack of availability of mortgage finance meaning it is more difficult for households to access the housing market. (House prices themselves are lower in real terms than in 2009, and interest rates on mortgages are also at historically low levels). As economic conditions and access to credit improve, affordability will also improve towards the level identified in the 2009 needs update. This demonstrates the volatility of affordable housing need, and highlights uncertainties associated with projecting annual need assessed at one point in time over the plan period. It

[44] Nottingham Core Strategic Housing Market Assessment at 2007 http://nottinghamcity.gov.uk/index.aspx?articleid=3059
Nottingham Core HMA ; Housing Market Needs Update 2009 http://www.nottinghamcity.gov.uk/CHttpHandler.ashx?id=36373&p=0
Broxtowe SHMA 2012 Update http://www.nottinghamcity.gov.uk/CHttpHandler.ashx?id=40330&p=0
Gedling SHMA 2012 Update http://www.nottinghamcity.gov.uk/CHttpHandler.ashx?id=40331&p=0
Nottingham SHMA 2012 Update http://www.nottinghamcity.gov.uk/CHttpHandler.ashx?id=40329&p=0

[45] This is largely because the numbers on the housing register are lower, due to a combination of factors including a more thorough annual review of applications and the introduction of choice based lettings (which required all applicants to re-register for housing in early 2011). There is still a significant unmet need for affordable housing in Gedling.

also highlights the fact that projecting forward annual affordable housing need over the plan period can be misleading, meaning that ongoing monitoring and review will be important

8.4 For this reason, the Councils consider the monitoring of need should be undertaken on the basis of the Affordable Housing Needs update 2009, because these figures reflect a period of more buoyant housing market conditions. Affordable housing need will be monitored and kept under review, and a full review of the Strategic Housing Market Assessment will be undertaken after the production of government Household Projections based on the results of the 2011 Census, which are expected to be published in 2014.

8.5 The Nottingham Core Strategic Housing Market Area Assessment Update 2009 findings equate to an affordable housing provision for the three Councils of 19,210, representing approximately 63% of the total housing provision of 30,550 for the plan area. Evidence clearly indicates that achieving this level of provision through the planning system is unviable, and the varying percentages sought by the Councils have regard to viability evidence.

Level of affordable housing sought in the plan area

8.6 The Councils seek affordable housing contributions in the following proportions:

- Broxtowe Borough: 30%
- Gedling Borough: 10%, 20% or 30% depending on location
- Nottingham City: 20%

8.7 The thresholds for sites where these percentages are applied vary between the Council areas as indicated below.

8.8 Broxtowe currently has a threshold of sites of 1 hectare or 25 dwellings, set out in saved policies of the Broxtowe Local Plan 2004. Lower thresholds will be tested in the preparation Development Management and Allocations Development Plan documents, although the 30% flat rate target across the Borough is proposed to remain (if approved by the Council). It is acknowledged that further plan-wide viability assessment evidence will be required to support this, taking into account affordable housing and any other local standards. This 30% flat rate is considered appropriate for the following main reasons:-

- It is simple to understand, and there is a degree of pragmatism in its application which allows for the individual nature and viability of sites to be taken into account.
- The sub market analysis of typical sites in the Three Dragons viability report is crude and cannot reflect the full range of issues found on individual sites, therefore applying lower rates could needlessly reduce the amount of affordable housing deliverable. This is particularly the case in Broxtowe due to the distribution and nature of land availability. It is

acknowledged at paragraphs 3.25 to 3.27 of the Broxtowe viability report that viability on 'very large sites' of several hundred dwellings will have the potential to create their own market. In addition the 'weakest sub markets' such as Eastwood have different and very pronounced sub markets within them. A search of the Zoopla property website in February 2013 indicates an increase in average asking price of almost £40,000 for 2 bedroom properties in the area at the north of Eastwood bounded by the A608 Mansfield Road to the west and Greenhills Road to the south, when compared to 2 bed properties on sale in the remainder of this NG16 3 postcode area of Eastwood (£133,000 compared to £95,000). It is in the more affluent north of Eastwood where the majority of available sites for allocation are located, with options to allocate more than 300 homes if required. If one (or more than one) of these options are selected then significantly more than 10% affordable housing can be achieved viably. If smaller less affluent areas are selected for allocations, there is sufficient flexibility in the Policy to deal with viability on a site by site basis. Similar choices will be made elsewhere in the Borough with options available to the Council to meet the majority of its housing allocations on large sites very attractive to the market, on which 30% affordable housing delivery is not unreasonable. Even in the recent past sites in Eastwood have been developed with high percentages of affordable housing including in some cases 100% affordable housing schemes.

- Notwithstanding this, Broxtowe has amended delivery assumptions in it's SHLAA in line with the evidence in the 'Housing Market and Economic Prospects' report undertaken by GL Hearn in 2012, with the result that delivery assumptions in the less viable areas (Eastwood in particular) have been reduced in urban areas in the early years of the plan. The sites that do come forward will for the most part be able to deliver significantly more than 10% affordable housing.
- Demarcating different areas of the Borough with different affordable housing requirements can distort the market around the boundaries. Some other authorities who have taken a varied approach in the past have since abandoned it due to these distortions. This would be particularly pronounced between Beeston and Stapleford Sub markets with the town/ parish boundary between these areas bisecting one potential development site north of Toton. This area is one of the most affluent in the Borough (bisecting the Beeston and Stapleford sub markets) and to attempt to define boundaries through the site would be misleading and would adversely affect affordable housing delivery.
- The Borough's housing market is not typical in regard to the 'wealthiest' sub markets. In contrast to Gedling, the wealthiest sub markets are in the high density urban areas in the south of the Borough with more rural areas having lower levels of viability, albeit within towns and villages. This adds to the difficulty of differentiating between sub markets in the policy. The Stapleford/ Toton demarcation (above) is a good (but not the only) example of the flaws of this approach in Broxtowe.

8.9 Gedling Borough Council's requirements in relation to affordable housing are set out in the Council's Supplementary Planning Document dated December 2009. The threshold for qualifying sites is 15 dwellings or greater, with no site area threshold. With regards to the proportion of affordable housing sought, the Council requires the provision of 10% affordable housing in the Newstead and Colwick/ Netherfield sub-markets; 20% affordable housing in the Arnold/Bestwood, Calverton and Carlton sub-markets; and 30% affordable housing in the Arnold/Mapperley, Bestwood St Albans, Gedling rural north and Gedling rural south sub-markets. The use of three percentages is based on the evidence of viability sub markets and therefore reflects the wide range of land prices and affordability in the Borough.

8.10 Nottingham City currently has a threshold of sites of 1 hectare or 25 dwellings, set out in saved policies of the Nottingham Local Plan 2005. A lower threshold will be tested of 15 dwellings or 0.5 hectare through the preparation of its Preferred Option Land and Planning Policies Development Plan Document, although the 20% flat rate target across the City is proposed to remain (if approved by the Council). It is acknowledged that further plan-wide viability assessment evidence will be required to support this, taking into account affordable housing and any other local standards. It is not a Core Strategy proposal.

8.11 Nottingham City Council applies a flat rate percentage across its area. In Nottingham City, the viability evidence from the 'Nottingham Core Affordable Housing Viability Assessment Report' (November 2009) suggests varying levels of viability across the area, in recognition of what it acknowledges is a highly complex housing market. This is as high as 40% in some sub markets, but there are some other sub markets where the study finds affordable housing may not be viable (depending on the site/development characteristics). Similarly to Broxtowe Borough, having a flat rate is considered to be the best approach in Nottingham City for the following reasons:

- it is simple to understand, and there is a degree of pragmatism in its application which allows for the individual nature and viability of sites to be taken into account;
- the sub market analysis of typical sites is crude and cannot reflect the full range of issues found on individual sites, therefore applying lower rates could needlessly reduce the amount of affordable housing deliverable;
- Demarcating different areas of the City with different affordable housing requirements can distort the market around the boundaries. Some other authorities who have taken a varied approach in the past have since abandoned it due to these distortions;
- The City's housing market is complex and lacks clear demarcations of areas such as 'wealthy rural vs urban'.

Affordable Housing and the level of overall housing provision

8.12 Representations made to the Aligned Core Strategies suggest that the level of need for affordable housing was such that a higher overall housing provision figure was merited in order to deliver more affordable housing. That there is a high need for affordable housing is a recognised fact across much of the Country, and the area is not unique in this regard. The housing provision allows for a significant contribution to meeting affordable housing need, balanced against viability considerations. Further housing provision to support the delivery of affordable housing would inevitably lead to further Green Belt land allocations (as all reasonable brownfield options are already being pursued).

8.13 As it is considered that the housing provision in the Core Strategies meets the objective assessment of overall housing need, and the Councils' evidence concerning housing delivery (see Housing Market and Economic Prospects Report, G L Hearn, 2012) suggests the current housing provision is challenging but achievable, additional housing provision over and above that level is very unlikely to be delivered. Instead, further housing provision would be likely to result in a redistribution of housing development from sustainable previously developed urban sites in favour of less sustainable Green Belt sites and would not increase housing development overall. As such, it would also not result in the delivery of more affordable housing, and would be counter to the sustainability objectives of the plan. In particular it would not accord with several NPPF Core Principles including encouraging the effective use of land by reusing land that has been previously developed, protecting the Green Belt, conserving the natural environment, and focussing significant development in locations which are or can be made sustainable. It may be argued that housing delivery on Green Belt sites would be likely to deliver more affordable housing than development on brownfield sites due to better viability, however this is not considered to outweigh the sustainability factors mentioned above.

9. Approach to Housing Trajectories

Introduction

9.1 Some representations made to the Aligned Core Strategies have questioned the approach to the housing trajectories, and thus to the calculation of the five year land supply.

9.2 The Aligned Core Strategies' housing trajectories do not anticipate a uniform delivery of housing throughout the plan period, rather they anticipate housing delivery will be lower in the early part of the plan period, but then increase in the middle and later part of the period. Representations point out that this makes calculating the five year land supply for each Council more difficult, and some would prefer a uniform trajectory.

9.3 Ideally, a housing trajectory would match the supply of new housing to the need for housing over the plan period, as set out in the objectively assessed need for housing. To be meaningful, however, housing trajectories should reflect the most likely level of delivery over the plan period. There are two principal reasons why housing completions are anticipated be lower at the beginning of the plan period:-

- Current economic circumstances
- Housing delivery on larger sites

Current economic circumstances

9.4 The lack of delivery in recent years (which is anticipated to continue in the short term) has been brought about by the 'credit crunch'. Access to credit and mortgages is much more limited now than prior to the economic downturn, and this has resulted in starts on a number of significant housing schemes to stall, some planning applications to lapse, and for some otherwise attractive development propositions to not be pursued. In order to assess the local situation, and to get an understanding of the prospects and timing of housing market recovery, the Councils commissioned G L Hearn to undertake a 'Housing Market and Economic Prospects' study (November 2012). The study concludes that in the short term it is not housing land supply that is holding back the housing market, but the lack of availability of credit. They consider that the most likely scenario is a gradual recovery in the housing market, with sales returning to nearer long-term average over a period of 4 to 6 years. They comment on the housing trajectories and housing provision, stating that the levels of housing provision are challenging but achievable. They also comment that there is scope for any delivery shortfall against the trajectories in the early part of the plan period to be made up later.

Housing delivery on larger sites

9.5 The Aligned Core Strategies include a number of strategic sites, both as allocations and as broad locations. Most of these sites do not yet have the benefit of planning permission. Due to the nature of large sites, it is often necessary for the developer to provide infrastructure (drainage, access, roads etc) prior to delivering homes. Even on sites allocated in the Core Strategies, although they are anticipated to start to deliver homes within the first 5 years of the plan period, most of the homes on the sites will be delivered later.

9.6 In the light of these factors, the Councils approach to delivery as expressed through their trajectories is considered to be the only realistic one, and one that is fully justified by the evidence.

Basis of the trajectories

9.7 The authorities have produced trajectories to show how the Core Strategies housing provision figures would be delivered (see Appendix C of the Aligned Core Strategies). In order to do this, they have updated their Strategic Housing Land Availability Assessments to 31st March 2012 and made assumptions about likely windfalls and demolitions. Details of how each of the authorities have done this are contained in their 2012 Housing Land Availability Reports as follows:

Broxtowe – "Housing Land Availability as at 31st March 2012[46]" (February 2013)
Gedling – "Five Year Housing Land Assessment as at 31 March 2012[47]" (February 2013)
Nottingham – "Housing Land Availability as at 31st March 2012[48]" (February 2013)

5 Year land supply in the Aligned Core Strategies

9.8 The National Planning Policy Framework (NPPF) requires planning authorities to maintain a supply of available land for housing. It says (para. 47) that planning authorities should:

- identify and update annually a supply of specific deliverable[49] sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved

[46] Document available here http://www.broxtowe.gov.uk/CHttpHandler.ashx?id=27476&p=0
[47] Document available here http://www.gedling.gov.uk/media/documents/planningbuildingcontrol/Five%20Year%20Housing%20Land%20Supply%202012.pdf
[48] Document available here http://www.nottinghamcity.gov.uk/CHttpHandler.ashx?id=40898&p=0
[49] To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land; and

- identify a supply of specific, developable[50] sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.

9.9 The Aligned Core Strategies authorities have assessed their past housing delivery against the policies of the Nottinghamshire and Nottingham Structure Plan (February 2006) and the Regional Plan which were current at the time. They have concluded that their past performance cannot be described as "a record of persistent under delivery", as it is only recent years, following the credit crunch and the collapse of the housing market nationally, that they have slipped behind what was required. They, therefore, consider that an additional buffer of only 5% is required. The basis for this conclusion is given in each of their Housing Land Availability Reports.

9.10 The authorities have also assessed the total completions expected on the deliverable and developable sites listed in their Housing Land Availability Reports against what is required in the first 5 years of the plan-period[51] and beyond that. The amount of housing which is required is taken from the table in Policy 2.3 of the Aligned Core Strategies, which gives separate figures for 2011/13, 2013/18, 2018/23 and 2023/28 totalling to the overall figure for the whole plan-period 2011 to 2028.

9.11 Details of the calculations are given in the reports, but, in summary, the conclusions are that:

- Broxtowe has **5.47 years** supply in deliverable sites and a further **10+ years** in developable sites.
- Gedling has **5.25 years** supply in deliverable sites and a further **10+ years** in developable sites.
- Nottingham has **5.63 years** supply in deliverable sites and a further **10+ years** in developable sites.

9.12 All of the authorities, therefore, meet the requirement to have at least 5 years worth of housing sites plus a 5% buffer in deliverable sites and at least a further 5 years of developable sites.

[50] To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.
[51] In this case, in line with previous Government guidance (CLG letter to Chief Planning Officers of 20th August 2008), this is 2013 to 2018. No more recent guidance is available.

10. Update of housing completions to 31st March 2012

10.1 This chapter updates the housing completion figures in Table 3.1 of the Housing Background Paper to 31st March 2012.

Table10: Nottingham Core HMA - net dwelling change

	2001/02	2002/03	2003/04	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	**Total 2001/12**	**Ave p.a.**
Broxtowe	119	145	206	315	381	367	376	268	95	222	140	**2,634**	**239**
Erewash	168	156	170	251	705	362	482	414	193	223	223	**3,347**	**304**
Gedling	133	202	355	236	244	296	447	204	274	341	275	**3,007**	**273**
Nottingham	1,124	1,065	1,332	1,186	2,057	1,523	1,360	752	912	314	422	**12,047**	**1,095**
Rushcliffe	157	333	273	474	261	456	493	191	227	216	294	**3,375**	**307**
Nottingham Core HMA	**1,701**	**1,901**	**2,336**	**2,462**	**3,648**	**3,004**	**3,158**	**1,829**	**1,701**	**1,316**	**1,354**	**24,410**	**2,219**

There have been some small changes to the figures for 2001/05 in Rushcliffe since the Housing Background Paper.
Purpose-built student dwellings are included.

Source: Based on information provided by Council Planning Departments.
Years are financial years i.e. April 1st to March 31st.