STAFFORDSHIRE MOORLANDS LOCAL PLAN EXAMINATION
STATEMENT BY STAFFORDSHIRE MOORLANDS DISTRICT COUNCIL ON THE INSPECTOR'S MATTERS, ISSUES & QUESTIONS

MATTER 3

Housing and Employment Objectively Assessed Needs (OAN) and Requirements

APPENDIX 1 – HOUSING OAN

1.1 The Framework (March 2012) identifies that LPAs should use their evidence base to define the full, objectively assessed, needs for both business and housing in their area, and then seek to ensure that their Local Plan meets these needs.

1.2 The housing evidence base underpinning the Council's housing requirement includes a joint SHMA produced by Lichfields on behalf of High Peak Borough Council [HPBC] and Staffordshire Moorlands District Council [SMDC] in April 2014. Since then, Lichfields has produced a number of updates to SMDC's housing needs figure in response to new data releases to ensure the Objectively Assessed Housing Need [OAHN] for Staffordshire Moorlands District remains up-to-date.

1.3 This included the Housing Needs Study 2012-based SNPP Update (August 2014); the July 2015 SHMA Update; and the January 2016 Staffordshire Moorlands SHMA Update which was prepared to take into account the latest mid-year population estimates [MYE] as well as relevant case law[1] relating to the derivation of housing need.

1.4 The most recent update, which has directly informed the housing requirement of 320 dpa set out in the Staffordshire Moorlands Local Plan (February 2018), is the Staffordshire Moorlands SHMA Update 2017 (February 2017). This reviewed the implications of the 2014-based household projections [SNHP], the 2014-based Sub-National Population Projections [SNPP] and post-Brexit economic job growth forecasts, as well as assessing the latest policy changes ahead of the Council's Local Plan Review. It also sought to align with the Council's updated Employment Land Review [ELR], also undertaken by Lichfields in 2017, given the synergies between job growth and housing need. The base date for the SHMA Update was 2014 to align with the 2014-based population and household projections.

1.5 In practice, applying the 2012 Framework and Practice Guidance to arrive at a robust and evidenced OAHN is a staged and logical process:

- The starting point for Local Plans is to meet the full objectively assessed development needs of an area [§6, §47 and §156].
- An objective assessment of housing need must be a level of housing delivery which meets the needs associated with population and household growth, addresses the need for all types of housing including affordable and caters for housing demand [§159].
- Furthermore, a planned level of housing to meet objectively assessed needs must respond positively to wider opportunities for growth and should take account of market signals, including affordability [§17].
- In choosing a housing requirement which would not meet objectively assessed development needs, it must be evidenced that the adverse impacts of meeting

[1] Oadby and Wigston District Council vs. SoS for Communities and Local Government and Bloor Homes Limited: [2015] EWHC 1879 (Admin), dated 03/07/15. Kings Lynn and West Norfolk District Council vs. SoS for Communities and Local Government and Elm Park Holdings Ltd: [2015] EWHC 2464 (Admin), dated 09/07/15

needs would significantly and demonstrably outweigh the benefits, when assessed against the policies within the Framework [§14].

Where an authority is unable to meet its objectively assessed development needs or it is not the most appropriate strategy to do so, it must be demonstrated under the statutory duty-to-cooperate that the unmet need is to be met in another local authority area in order to fully meet development requirements across housing market areas [§179 & §182 bullet point 1].

1.6 It is against these requirements of the 2012 Framework that the Council's housing need has been identified. Based on past trends and the baseline housing economic and demographic context of Staffordshire Moorlands, a number of scenarios were identified, discussed and agreed with SMDC. The scenarios were carefully chosen to reflect the reasonable alternatives for future growth within the District. Lichfields modelled each of these scenarios using industry-standard PopGroup demographic modelling software, which draws upon relevant ONS and CLG demographic inputs.

1.7 The Practice Guidance is clear that household projections published by CLG should provide the starting point for estimating overall housing need[2]. It goes on to state that "*plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates*"[3].

1.8 However, household projections do not present the whole picture because they are trend-based, may reflect a long-term and structural under-supply of housing and do not take any account of the impact of future government or local policies, changing economic conditions or other factors that might have an impact upon demographic behaviour or household consumption.

1.9 As such, whilst the SNPP and SNHP remain the starting point for considering evidence of housing need, caution should be exercised when applying them in evidence. They can, and should, be subject to adjustment where specific evidence justifies it.

1.10 The latest 2014-based Sub-National Household Projections were published by CLG in February 2015. Over the full 25-year period (2014-39) of the new projections, there is projected to be average growth of 137 households per annum in Staffordshire Moorlands District. This rate of growth is lower than the level projected over comparable time periods for both the 2012-based and 2008-based household projections.

1.11 Lichfields' February 2017 SHMA Update for SMDC modelled the latest 2014-based SNHP and SNPP. The inputs and assumptions used in the modelling are set out in Section 3.0 and Appendix 1 of that document. Scenario A comprised the 2014-based SNHP/SNPP baseline, translating dwellings into households by making an allowance for vacant units and second homes (4.0% based on Council Tax records). Scenario A generated an estimated need for **170 dwellings per annum [dpa]** between 2014 and 2031, falling to 165 dpa if the time period is extended to 2033 to reflect a declining rate of population growth.

1.12 This incorporates population growth of 2,239 by 2031 and 2,416 to 2033, all of which is attributable to net in-migration which counteracts the significant decrease in population associated with natural change. However, an ageing population contributes towards a declining labour force and job losses, which could undermine economic stability in the long term.

[2] 2a-015-20140306
[3] 2a-015-20140306

1.13 Whilst the Guidance recognises that the CLG's household projections are "*statistically robust and are based on nationally consistent assumptions…plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates*"[4].

1.14 To maximise the robustness of the modelling, Lichfields undertook a series of sensitivity tests which included Scenario Ai: Partial Catch Up, whereby household formation rates for the younger age groups were accelerated above the rate in the 2014-based SNHP to reflect people's increased ability to access the housing market as the economy recovers. This Scenario resulted in a need of **192 dpa** to 2031 (186 dpa to 2033).

1.15 Scenario Ab modelled a further sensitivity test that restricted the 2015 population to the latest MYE rather than the 2014-based SNPP figure for that year. The population was then re-based going forward applying the fertility, mortality and migration rates from the 2014 SNPP. Using this scenario, there would be a total dwelling need of **196 dpa to 2031** and 190 dpa to 2033.

1.16 Further Scenarios were modelled that explored the dwelling implications resulting from lower levels of net migration into the Borough over the short and long term (Scenarios B, C and D), but the analysis concluded that these scenarios failed to account for changes in migration patterns as a result of ageing and population growth in the wider region. On this basis, it was concluded that more weight could be attached to the latest ONS 2014-based SNPP migration calculations than the long term/zero net/natural change scenarios in planning for future needs.

1.17 **Lichfields concluded that Scenario Ab (2014-based SNPP, PCU + 2015 MYE), at 196/190 dpa to 2031/2033 represented a robust baseline demographic need before any further adjustments were made for market signals, economic growth or affordable housing.**

Market Signals Analysis

1.18 The Practice Guidance indicates that once an assessment of need based on household projections is established, this should be adjusted to reflect appropriate market signals.

1.19 An appropriate comparison of these should be undertaken and an upward adjustment made where such market signals indicate an imbalance in supply and demand. The more significant the constraints, the larger the additional supply response should be[5].

1.20 Lichfields undertook a detailed review of market signals (Section 4.0 of the February 2017 SHMA Update). The analysis found that whilst Staffordshire Moorlands' housing market faced some challenges, most of the market signals analysed are not noticeably worse than nearby areas and there is limited evidence of a divergence from the county-wide and national signals. Nevertheless, there is substantial variation across the District, especially between the rural and Peak District National Park areas.

[4] 2a-017-20140306
[5] 2a-020-20140306

1.21 However, there has been a significant change in affordability between 2000 and 2015. As house price levels remain relatively low, this could be indicative of fluctuations in real incomes. Affordability worsened between 2014 and 2015 above the trend in house price growth and above both the county and national averages.

1.22 Whilst the Council over-delivered in respect of housing targets in 2014/15, this was partly due to Ascent, a joint venture between Staffordshire Moorlands District Housing and Your Housing Group, building significant levels of affordable housing units across the District. This year aside, delivery figures have historically been low, and since 2011 have averaged less than half of the Core Strategy target.

1.23 As such, it was concluded that the spread of delivery over the period 2011 to 2015 may be exacerbating problems of affordability, generating adverse outcomes for people who still need to access the housing market, although it is possible that the relatively affordable private rented sector is lessening the impact of this.

1.24 The market signals analysis suggested that there needed to be some improvement in affordability within Staffordshire Moorlands and a requirement to boost the past under-delivery of housing.

1.25 The extent of the uplift is essentially a subjective judgement, but should be set at a level which could reasonably be expected to improve affordability. As such, it was considered that some upward adjustment could be necessary. It was Lichfields' judgement that, balancing the various key market indicators, an uplift of **around 10%** would be appropriate. This would align with the conclusions of a number of recent Inspector's reports at Local Plan EiPs that have helped to clarify the issue, such as Eastleigh and Uttlesford.

1.26 Applied to the 196 dpa/190 dpa baseline demographic need, this equates to a housing need **of 216 dpa / 209 dpa**, which was considered sufficient to address demographic needs and worsening market signals in the District.

Alignment with Economic Growth

1.27 There was also a need to deliver a realistic level of housing that addresses the economic needs of Staffordshire Moorlands District. The Practice Guidance[6] requires plan-makers to assess likely employment growth based on past trends and/or economic forecasts. Where the labour force supply is projected to be less than the forecast job growth, the Practice Guidance states that this could result in unsustainable commuting patterns which could potentially reduce the resilience of local businesses.

1.28 A number of scenarios were modelled in the 2017 SHMA Update by Lichfields to demonstrate the impact of a range of likely growth scenarios based on existing trends and forecasts. These scenarios also showed the scale of change that would be required if demographic trends were to be reversed. As all of the demographic led scenarios result in a declining labour force, the (positive) economic forecasts for Staffordshire Moorlands indicated that additional housing above the demographic needs would be necessary in order to meet the District's future economic growth needs.

[6] 2a-018-20140306

1.29 The project total job growth forecasts ranged from zero (Scenario F, Job Stabilisation), through to +339 (Scenario E: Oxford Economics), +1,400 (Scenario H: Experian), +870 (Scenario I: Combined) up to +3,038 (Scenario G: Past Trends).

1.30 Whilst it is undesirable to plan for decline, at the same time there is a need to look at what is realistic and achievable, taking into account past performance. If job stabilisation was sought, (Scenario Fa), at least 282 dpa would be required to 2031 (274 dpa to 2033).

1.31 As for the Oxford Economics Scenarios, these suggest a need for between 279 dpa up to 302 dpa if higher PCU headship rates are applied. The Experian Scenarios suggest that this need could be considerably higher, between 333 dpa and 357 dpa, whilst a Combination of the OE and Experian projections would indicate a need for between 306 dpa and 329 dpa. The Past Trends Scenarios result in by far the highest dwelling needs, from 420 dpa to 446 dpa depending upon whether the higher PCU headship rates are applied or not.

1.32 Both forecasting houses produce credible and robust estimates of job growth at a local area level, and no obvious anomalies have been revealed from the analysis undertaken in the SMDC 2017 ELR, albeit the strong growth in some of the manufacturing sectors appeared optimistic in the light of past trends. On this basis, it was considered reasonable to attach greater weight to the Combined Job Growth Scenario Ia (including PCU), which suggests a need for up to **329 dpa to 2031**, falling to 319 dpa to 2033.

1.33 To achieve the 420 dpa / 446 dpa that would be required based on a continuation of past job growth rates would require a 6-fold increase in net population growth compared to the 2014-based SNPP and would require more than 10,000 additional migrants from elsewhere across the UK/abroad to move into the District. Given that this scenario produces a level of housing need far in excess of any of the other scenarios, and would appear to be considerably at variance with the most recent job growth projections for the District, it was considered that the Past Trends scenarios should be considered as outliers and excluded from the overall housing OAN range.

1.34 As such, the SHMA Update concluded that Scenario Ha, Combined Job Growth + PCU, which is equal to **329 dpa / 319 dpa**, would be appropriate to inform the employment-led upper end of the OAHN range.

Affordable Housing Need

1.35 With regards to the incorporation of affordable housing needs into the total housing figures included in Local Plans, the Practice Guidance[7] sets out the following:

> *"The total affordable housing need should… be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes."*

1.36 The 2017 SHMA (Sections 6-7) identified a net annual affordable housing need of between 224 - 432 dpa to 2031, which would require a total OAHN of 679 - 1,309 dpa, which is significantly in excess of all of the modelled scenarios. In practice it is extremely unlikely that anywhere near this level of

[7] 2a-029-20140306

housing delivery will ever be achieved in Staffordshire Moorlands, which has yet to deliver more than 230 affordable dwellings (net) in any one year.

1.37 The Practice Guidance states that an increase in the total housing figures included in the Local Plan should be considered where it could help deliver the required number of affordable homes[8]. An additional **10% uplift** to the demographic-led OAHN (in addition to the uplift accounting for market signals) would go some way towards meeting the high level of affordable housing need identified for Staffordshire Moorlands and therefore be representative of a minimum **OAHN of 237 dpa (2031) or 230 dpa (2033).**

1.38 The process to derive the OAHN range for Staffordshire Moorlands District is therefore summarised in Table 1, which indicates that Staffordshire Moorlands District's OAHN is between 235 dpa – 330 dpa between 2014 and 2031, decreasing to between 230-320 dpa to 2033.

Table 1 Approach to OAN for Staffordshire Moorlands 2014-2031/33

	Dwellings per annum (2014-2031)	Dwellings per annum (2014-2033)
Demographic Starting Point	170 dpa	165 dpa
Adjustments to Demographic-led Needs	196 dpa	190 dpa
Uplift for Market Signals	216 dpa	209 dpa
Employment Led Needs	329 dpa	319 dpa
Affordable Housing Needs (@33% delivery)	679 – 1,309 dpa	679 – 1,309 dpa
Uplift to demographic led needs for Affordable Housing (@10%)	237 dpa	230 dpa
Full Objectively Assessed Needs (rounded)	**235 dpa – 330 dpa**	**230 dpa – 320 dpa**

[8] 2a:029-20140306

APPENDIX 2

EMPLOYMENT OAN

1.39 The objectively assessed needs for economic development in land and floorspace terms is considered appropriate and effective on the basis of up to date, robust evidence which supports the approach and demonstrates that it is deliverable. The primary evidence base documents for this approach comprises the 2014 Employment Land Study and, subsequently, Lichfields' February 2017 ELR Update report.

1.40 The February 2017 report focussed on updating the economic factors driving the demand for employment land in the district, factoring in the results of the October 2016 Oxford Economics [OE] projections and the December 2016 Experian projections. The report commented on the nature of employment typologies including the needs of specific sectors, use classes and types of B-Class and non B-Class employment uses. The report concluded by providing the likely land and floorspace needs for Staffordshire Moorlands District to guide employment land provision in the Council's emerging Local Plan.

1.41 In doing so, both the 2014 ELS and the subsequent 2017 Update were conducted in full accordance with the Practice Guidance. A key input into the process was consultation with various organisations with an interest in the supply of employment land including local businesses, economic development officers and property agents. A Business Questionnaire was issued to local companies and a number of responses were returned which directly informed the conclusions to the 2014 ELS. In accordance with the Duty to Co-operate, consultation took place with adjoining local authorities to identify cross boundary work being undertaken and to understand the extent of available employment land / unmet requirements across the wider sub-region.

1.42 Both documents provided land requirements for the administrative area of Staffordshire Moorlands District Council. As the vast majority of the data relates to B-class job growth and employment land, the apportionment of any land requirement to the National Park Authority area is likely to be minor in nature.

1.43 Section 4.0 of the 2017 Update examined the B-class employment space requirements for SMDC for the period 2011-2031/33. To estimate the broad scale and type of additional employment land required, a number of different indicators and factors were considered. A series of scenarios were developed based upon forecast employment growth in the main B-class sectors, and the consideration of population forecasts and future growth of local labour supply and the amount of jobs and employment space this could support in line with the Practice Guidance[9].

1.44 These included the following scenarios:

- Forecasts of employment growth in the main B class sectors (**labour demand**) derived from the latest available economic forecasts. Five scenarios were modelled – a 'baseline', incorporating October 2016 Oxford Economics [OE] projections; an Experian baseline from December 2017; a Combination Jobs Growth Scenario (which took an average of the OE/Experian scenarios); a Past Trends scenario using the OE data; and a 'Job Stabilisation' scenario;
- Consideration of **past take up,** or completions, of employment space based on monitoring data supplied by the Council, and how these might change in future; and,
- Estimating future growth of **local labour supply** relating to the 2014-based SNHP and the adjusted demographic starting point of 196 dpa target for Staffordshire Moorlands District in the 2017 SHMA Update, which was undertaken in concert with the ELR Update. The amount of

[9] 2a-032-20140306

jobs and employment space that this could support was estimated, based on Lichfields' PopGroup demographic model.

1.45 Employment densities (as recommended in the latest HCA Employment Densities Guide, adjusted to translate jobs into FTEs) and plot ratios by use class were applied to the FTE job change figures to translate the above scenarios into employment land projections.

Table 2 Staffordshire Moorlands Gross Employment Land Comparisons 2014-31

		B1a/b	B1c/B2	B8	TOTAL
1) OE Baseline	2014-2031 (net)	1.38	-4.60	-0.80	**-4.03**
	2014-2031 (gross)				**14.37**
	+ Flexibility factor				**16.89**
2) Past Trends	2014-2031 (net)	2.81	-2.04	3.10	**3.87**
	2014-2031 (gross)				**22.26**
	+ Flexibility factor				**24.79**
3) Experian	2014-2031 (net)	1.16	16.35	-0.37	**17.14**
	2014-2031 (gross)				**35.53**
	+ Flexibility factor				**38.06**
4) Combination Job Growth	2014-2031 (net)	1.27	5.88	-0.59	**6.58**
	2014-2031 (gross)				**24.95**
	+ Flexibility factor				**27.47**
5) Job Stabilisation	2014-2031 (net)	1.20	-4.92	-0.94	**-4.66**
	2014-2031 (gross)				**13.74**
	+ Flexibility factor				**16.26**
6) Past Take Up Rates	2014-2031 (net)	1.34	0.95	0.77	**3.06**
	2014-2031 (gross)				**21.45**
	+ Flexibility factor				**23.98**
7) Labour Supply (170 dpa)	2014-2031 (net)	0.35	-6.93	-1.73	**-8.31**
	2014-2031 (gross)				**10.09**
	+ Flexibility factor				**12.61**
8) Labour Supply (196 dpa)	2014-2031 (net)	0.38	-6.88	-1.70	**-8.19**
	2014-2031 (gross)				**10.20**
	+ Flexibility factor				**12.73**

Table 3 Staffordshire Moorlands Gross Employment Land Comparisons 2014-33

		B1a/b	B1c/B2	B8	TOTAL
1) OE Baseline	2014-2033 (net)	1.45	-5.36	-0.88	**-4.78**
	2014-2033 (gross)				**15.78**
	+ Flexibility factor				**18.30**
2) Past Trends	2014-2033 (net)	3.09	-2.50	3.26	**3.84**
	2014-2033 (gross)				**24.40**
	+ Flexibility factor				**26.92**
3) Experian	2014-2033 (net)	1.50	17.43	3.44	**22.37**
	2014-2033 (gross)				**42.93**
	+ Flexibility factor				**45.45**
4) Combination Job Growth	2014-2033 (net)	1.48	6.04	1.28	**8.79**
	2014-2033 (gross)				**29.35**
	+ Flexibility factor				**31.88**
5) Job Stabilisation	2014-2031 (net)	1.28	-5.67	-1.01	**-5.41**
	2014-2031 (gross)				**15.15**
	+ Flexibility factor				**17.68**
6) Past Take Up Rates	2014-2033 (net)	1.50	1.07	0.86	**3.42**
	2014-2033 (gross)				**23.98**
	+ Flexibility factor				**26.50**
7) Labour Supply (170 dpa)	2014-2033 (net)	0.36	-7.83	-1.85	**-9.33**
	2014-2033 (gross)				**11.23**
	+ Flexibility factor				**13.75**
8) Labour Supply (196 dpa)	2014-2033 (net)	0.39	-7.77	-1.83	**-9.21**
	2014-2033 (gross)				**11.35**
	+ Flexibility factor				**13.87**

1.46 The various econometric and labour supply scenarios, set out in Table 7.1 of the ELR Update 2017 (reproduced above) produced varying projections of need from which an indication of requirements could be drawn, from a low of -8 ha (the 2 labour supply scenarios) to a high of 17 ha net. Once an allowance had been made for the replacement of losses and a margin of choice, the initial (gross) B-Class employment land range increased to between 13 ha and 38 ha to 2031.

1.47 It is important to identify an appropriate level of need that achieves a balance between market realism and economic and planning policy objectives. A range of qualitative and quantitative factors was considered within the 2017 ELR Update to help inform a judgment on the appropriate level of need. This included the following considerations:

Staffordshire Moorlands benefits from a relatively high-value manufacturing base with linkages to sector expertise and clusters of businesses.

There is a lack of good quality small to medium-sized industrial premises, which is suppressing demand. In particular, the limited level of development in recent years has restricted the availability of sites for local businesses to expand.

Future realisable demand may be further restricted by the current poor and ageing existing stock, lack of public investment in infrastructure, poor access to many industrial estates/business parks, and weak inward investment offering relative to adjoining areas.

A high level of net out-commuting is also an issue in Staffordshire Moorlands where 12,737 more people commute out to work than commute in. The job density ratio of 0.64[10] in Staffordshire Moorlands District is very low compared to the West Midlands average of 0.78. Rebalancing the land uses of Staffordshire Moorlands District to ensure that more (and better quality) jobs are provided could help to reverse this trend.

Labour supply analyses for Staffordshire Moorlands based on the delivery of between 170 dpa and 196 dpa indicates that around 13 ha (gross) could be required up to 2031 and around 14 ha (gross) up to 2033.

1.48 Informed by these considerations, the ELR Update concluded that for Staffordshire Moorlands District, a range of between **13 ha and 27 ha** (gross) of employment land may be considered appropriate to 2031 and **14 ha and 32 ha** (gross) to 2033. It considered that a balanced approach would be appropriate which attached greater weight to the combined job growth from the two econometric models, rather than either in isolation.

1.49 This range is approximate to Labour Supply scenario at the lower end and the Combination Job Growth projection at the top end. The 27ha upper end of the range is only slightly higher than the level that would be suggested by the past take up of land (and past job trends), which would suggest that it is realistic and achievable.

1.50 The range aligns with Staffordshire Moorlands District's housing strategy; addresses the need to revitalise current poor-quality stock; and helps to rebalance the portfolio in terms of the size of properties available. It also factored in the continued economic uncertainty and the realism of facilitating a step-change in delivery.

1.51 This 13-27 ha range relates specifically to indigenous need for employment land in Staffordshire Moorland District and does not consider strategic employment land. The c.50 ha allocation at Blythe Bridge is still required to meet wider sub-regional requirements.

[10] A Jobs Density Ratio of 0.5 means that there are 0.5 jobs within the local authority for every resident of working age. The data is source is ONS, 2014

APPENDIX 3

ALIGNMENT BETWEEN HOUSING AND EMPLOYMENT OAN

1.52 The SHMA and Employment Land Studies have been co-ordinated and based on common data and scenarios in order to better understand the relationship between housing and employment and to support an appropriate balance of development.

1.53 Whilst recognising that there is not a straightforward direct causal relationship between job growth and housing need, it is generally understood that the two are nevertheless fundamentally related. A level of housing provision that bears no relation to SMDC's economic needs would result in internal inconsistencies in the Local Plan and have unsustainable consequences.

1.54 The 2017 ELR Update (ED17.5) identified a need for between 13 and 27 hectares of employment land across the District to 2031. The lower end of this range aligns with the labour supply scenarios, which modelled the employment land (and job) implications of the two demographic scenarios 170 dpa and 196 dpa. This comprised the demographic starting point underpinning the 2017 SHMA Update.

1.55 The upper end of the range, 27ha, equates to the land requirement resulting from Scenario 4, the Combined Job Growth (from the OE and Experian econometric modelling). This equates to net job growth of 794 FTEs (870 workforce jobs), of which 435 FTEs are likely to be based in B-Class jobs.

1.56 This level of job growth was also modelled in the 2017 SHMA using the PopGroup demographic model. As summarised in Table 3.9 of the SHMA Update, this would equate to population growth of +8,471 to 2031, household growth of 4,991 and a dwelling need of 5,199, or 306 dpa (falling to 295 dpa to 2033) for Scenario I, rising to 329 dpa for Scenario Ia once the higher household formation rates were applied (and 319 dpa to 2033).

1.57 In order to provide a balanced level of employment and housing, an employment land requirement of 27 hectares is proposed. As with the housing requirement, this level of development is towards the top of the range of identified needs and will help to support the growth of around 800 FTE jobs.

1.58 As such, the upper end of the (rounded) housing OAN range, of 330 dpa, aligns with the 27 ha objectively assessed employment land need identified in the ELR Update.