
Review of Objectively Assessed Housing Need In Epping Forest

Research Report

Draft Version 3.0



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1. Introduction

1.1. Aim

The purpose of this report is an assessment of the evidence base supporting the Preferred Options Paper and informing our representations on behalf of Cirrus and L&Q.

This report will review the objectively assessed housing need (OAN) in Epping Forest, which is part of the West Essex and East Herts housing market area (HMA) also comprising East Hertfordshire, Harlow and Uttlesford districts. It will focus on areas of weakness in the approach taken and suggest approximate potential changes. The calculation of a robust alternative measure for OAN would take more time, requiring the use of advanced demographic modelling (Edge Analytics POPGROUP), and is beyond the scope of this report.

Savills Research has undertaken previous studies of housing need in the wider HMA. Since the analysis for our previous reports was carried out, two key developments in terms of calculating housing need have taken place.

- The Local Plans Expert Group (LPEG) published their recommendations on improving the Local Plan process in March 2016. This proposed a more prescriptive and systematic approach to defining the baseline need and any possible uplifts.
- The 2014-based household projections were published by DCLG in July 2016. These incorporate the latest migration data and population projections.

1.2. Approach

The key documents to be used in the review are:

- West Essex and East Hertfordshire Strategic Housing Market Assessment, ORS, September 2015 – “2015 SHMA”
- Updating the Overall Housing Need, ORS, August 2016 – “2016 SHMA Update”
- Memorandum of Understanding on Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire Housing Market Area, September 2016 – “Councils’ MoU”
- Epping Forest District Draft Local Plan Consultation 2016 – “draft Local Plan”

We will review these and any other relevant documents or analysis in the Council’s draft Local Plan evidence base.

1.2.1. The LPEG approach

Our approach will be in part guided by the recently published LPEG recommendations on estimating OAN. LPEG was established to consider how local plan making can be made more efficient and effective. The group’s report¹ was released on the 16th of March 2016 and was welcomed by the previous government in their 2016 Budget. The extent to which it is adopted is expected to be detailed in the Government’s housing white paper expected in January. The LPEG report recognises the problems and difficulties created by the lack of a consistent approach to assessing OAN. They have therefore proposed a simpler approach in Appendix 6² by providing revised text for the National Planning Practice Guidance (NPPG).

Although there is no certainty about whether some or all of the recommendations will be adopted by the new government, the recommendations provide a useful framework to assess OAN. Our approach is intentionally simplified to provide an assessment of the potential impact of the Council’s evidence rather than provide a definitive alternative measure of OAN.

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508345/Local-plans-report-to-governement.pdf

² <http://peg.org/wp-content/uploads/2016/02/Appendices-local-plans-report-to-government.pdf>

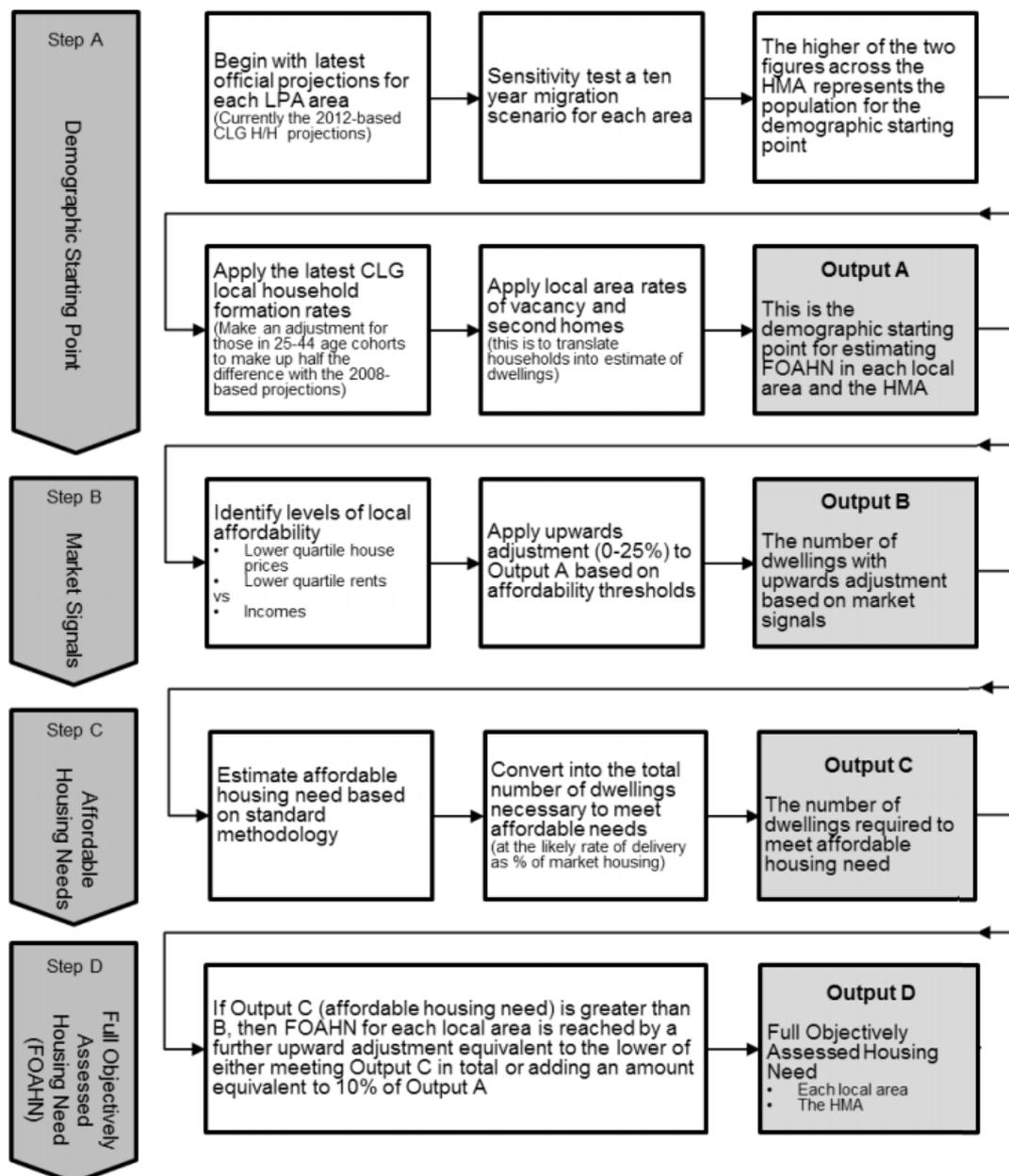
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The proposed LPEG methodology for calculating OAN is shown by the flow chart in Figure 1. This report will use aspects of it, with some simplifications, to highlight the potential impact on the proposed housing target for the districts in the HMA were the recommendations to be adopted.

Figure 1 - Proposed Process for Calculating Objectively Assessed Housing Need



Source: Local Plan Expert Group, Appendix 6

1.2.2. 2014-based household projections

The 2015 SHMA concluded that 46,100 dwellings were needed in total across the HMA over the 22 year plan period. The latest 2014-based household projections have been accounted for in the 2016 SHMA update, which concluded that the full objectively assessed need should increase to 54,608. Following this update, and as part of the Local Plan process, the Councils' MoU sets out how the housing requirements should be distributed spatially. All the relevant figures are shown in the table below:

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Table 1 – Summary of proposed housing requirements

	2015 SHMA	2016 SHMA Update	Councils' MoU
Epping Forest	11,300	13,278	11,400
East Hertfordshire	16,400	19,427	18,000
Harlow	5,900	7,824	9,200
Uttlesford	12,500	14,080	15,500
HMA total	46,100	54,608	51,100

Source: Council documents

The total target proposed for the HMA as a whole is therefore lower than the updated SHMA recommendation based on the latest demographic evidence, with no discussion of whether the unmet need will be dealt with by areas outside it.

1.2.3. Report structure

This report will address the component parts of the OAN calculation in the same order as they are set out in Chapters 5 and 6 of the 2015 SHMA, with reference to the PPG. Each will be assessed using the latest evidence and any possible changes arising out of the potential LPEG recommendations will also be set out.

2. Demographic Starting Point

Table 2 below shows the impact of the adjustment made in the 2016 SHMA update on the demographic starting point. The deviation from the official projections has a large impact on the figures for Epping Forest in particular, reducing the baseline need there by over 25%.

Table 2 – 2016 SHMA update: baseline calculations

	Epping Forest	East Herts	Harlow	Uttlesford	HMA
CLG 2014-based household projections 2011-33	14,374	17,243	7,653	11,427	50,697
Adjust for 10-year migration trend	-3,806	-1,547	-1,340	-246	-6,938
Final baseline household projections	10,568	15,696	6,313	11,181	43,759

Source: 2016 SHMA update (figures may not sum due to rounding)

Both the 2015 SHMA and the 2016 SHMA update make downwards adjustments to the demographic baseline need. The change arises from using custom ten year migration trends in preference to the official population projections (which are based on five year trends). The basis for the change is that the official projections are “very unstable”.

In the 2015 SHMA the main change to the demographic starting point was arrived at by moving to a longer, older migration baseline (10 years from 2001-11 vs. the standard 5 year baseline used in official projections, which was 2007-12 for the 2012-based population projections).

In the 2016 SHMA Update the approach is altered slightly, using an up-to-date 10 year baseline (2005 to 2015) and household formation rates from the 2014-based projections.

Whilst the use of the latest data is welcome, there are still two issues with this approach:

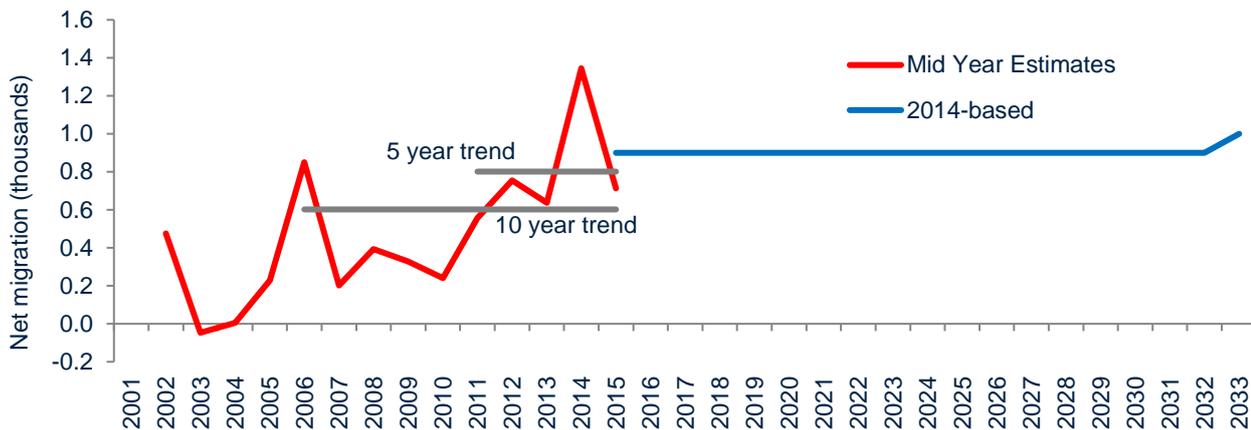
- The 10 year baseline is clearly influenced by the very low net migration seen in 2007-10, which was a period covering the financial crisis and subsequent recession. The weak economy and housing market would have suppressed migration during that time so it is unlikely to be representative of future behaviour.
- The household formation rates in the 2014-based projections are likely to be too low. They project forward the recent trend of suppressed household formation, which may not accurately reflect the true need.

In the following sub-sections we assess the impact of these changes in approach for Epping Forest and the HMA as a whole.

2.1. Epping Forest

Recent migration data for Epping Forest is shown in Figure 2 below. It is clear from the chart that net migration is on an upwards trajectory over the past few years, and although there has been some volatility, it has been higher than the 10 year trend in each of the last four years.

Figure 2 – Epping Forest Migration



Source: ONS

Given the potential impact of recessionary factors on migration behaviour we would suggest the official 2014-based projections remain the best starting point. The LPEG recommendation is to sensitivity test a ten year migration baseline but only allowing the possibility of revising upwards. Reversing the adjustment in the SHMA and using the 2014-based projections takes the projected growth in the number of households in Epping Forest back to **14,374 households** over the plan period.

Next we can assess the impact of a change in household formation rate. The 2016 SHMA update uses the rates from the 2014-based household projections, which are the most up-to-date available at time of writing. The unadjusted projections for the whole HMA only increase from 49,638 to 50,697 between the 2012-based and 2014-based projections, a +2.1% change. This is not in line with the +7.8% change in population projections between the 2012- and 2014-based figures, which suggests that average household size is not falling as much as previously expected, and therefore that household formation may indeed be being suppressed, potentially due to lack of supply and affordability issues.

Arriving at a complete alternative set of formation rates would require full demographic modelling beyond the scope of this report. But again the LPEG recommendations suggest a simple method to remedy this, using a blended rate recovering half of the difference in the 25-44 year old rate between the 2008-based and latest projections by 2033.

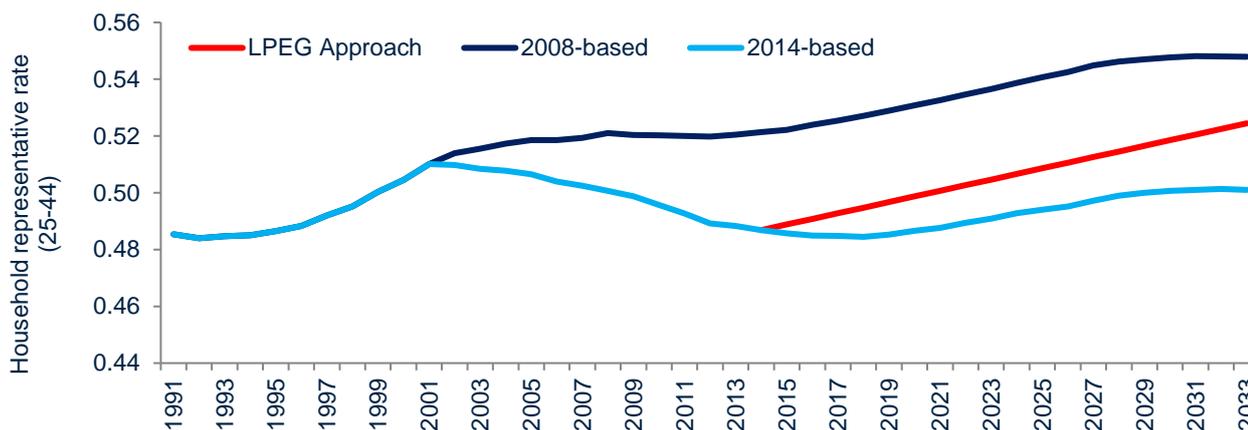
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Our simple model works on total population averages so we have first assessed the household representative rates for the 25-44 year age groups and then the affect any adjustment has on the overall household representative rate. Our analysis shows that household formation in Epping Forest has been suppressed relative to the 2008-based projections. Therefore we have applied a trend that recovers half the difference by 2033 (starting in 2014), as per the LPEG recommendation.

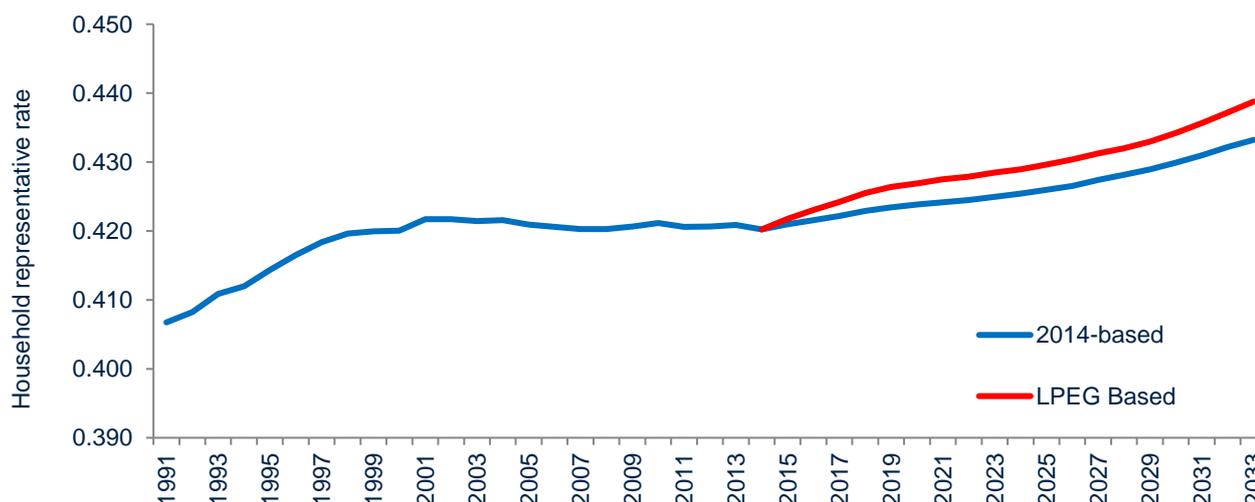
Figure 3 – Household Representative Rates for 25-44 Age Group in Epping Forest



Source: ONS, DCLG

Given our modelling approach, we next need to assess the impact on the overall household representative rate. Although the effect in the above charts looks large, when applied to the total population the effect is less significant, as shown below. The change leads to an additional 852 households between 2011 and 2033 (38.7 per year) in Epping Forest.

Figure 4 – Comparison of 2014-based and adjusted Overall Household Representative Rates in Epping Forest



Source: ONS, DCLG

Adding this to household projections above takes the total projected growth over the plan period to **15,226 households** for Epping Forest.

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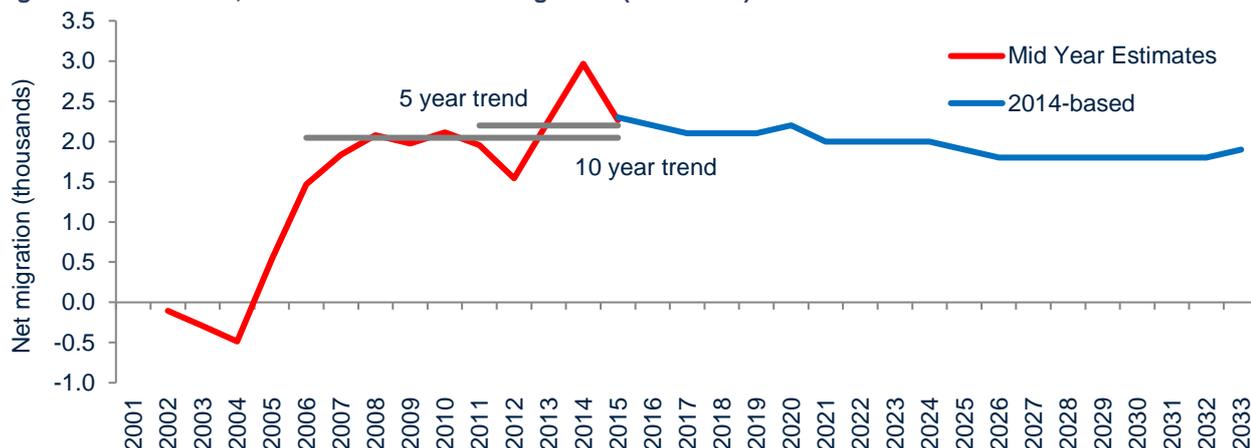
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2.2. Rest of HMA

The adjustment applied in the SHMA also applies to the other three districts, but with less impact on the baseline figures as the five and 10 year averages are broadly in line, as shown in Figure 5 below. Reversing the adjustment takes the household growth projection from 33,191 to **36,323** in East Herts, Harlow and Uttlesford over the plan period.

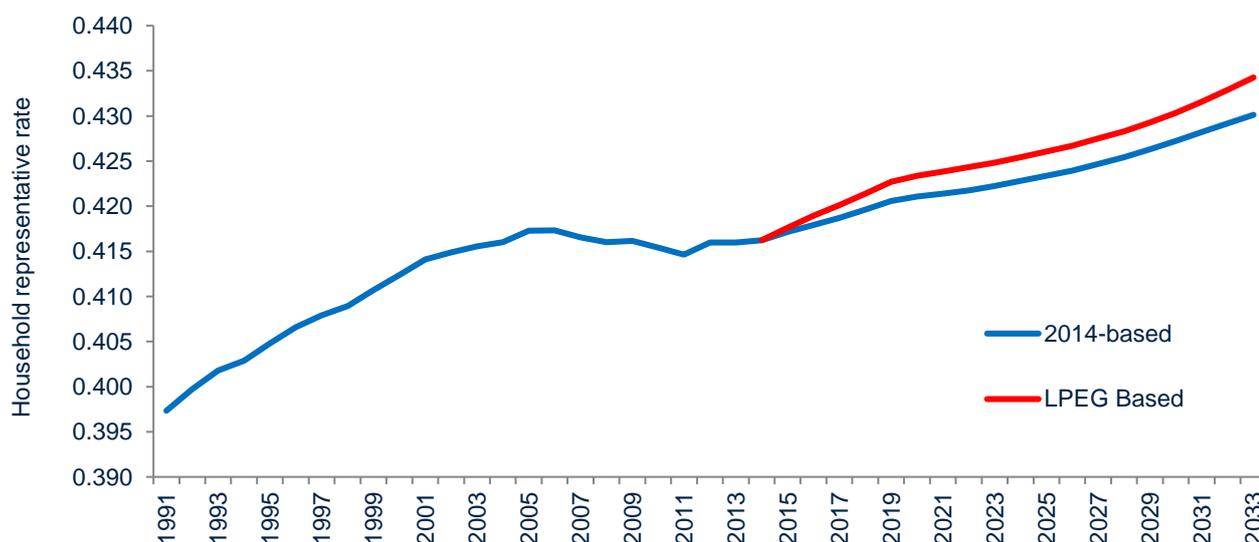
Figure 5 – East Herts, Harlow and Uttlesford Migration (combined)



Source: ONS

Below is the impact on overall household formation in East Herts, Harlow and Uttlesford, which shows quite a large effect, adding a further 1,536 households to the total requirement and taking it to **37,859** in these three districts.

Figure 6 – Comparison of 2014-based and adjusted Overall Household Representative Rates in East Herts, Harlow and Uttlesford



Source: ONS, DCLG

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2.3. Summary

In summary, our analysis suggests that the demographic starting point for the whole HMA, and just for Epping Forest, is as below:

Table 3 – Calculating the Demographic Starting Point

	2011-33			
	Whole HMA		Epping Forest	
	Plan Period	Per Annum	Plan Period	Per Annum
Baseline from 2016 SHMA Update	43,759	1,989	10,568	480
Reverse 10 year migration adjustment	+6,938	+315	+3,806	+173
Suppressed household formation adjustment	+2,388	+109	+852	+39
Savills suggested baseline (households)	53,085	2,413	15,226	692
Convert to dwellings*	55,206	2,509	15,942	725

Source: Savills using ONS, DCLG (figures may not sum due to rounding)

* Note: Conversion based on difference between dwellings and households from 2011 Census as per the SHMA

2.4. Notes on LPEG approach

The approach we have taken above is broadly in line with the LPEG recommendations on calculating demographic starting point. We have not fully tested the effect of using a 10 year baseline but given it is below the corresponding five year trend for each district we would expect the latest official projections to be most appropriate. We have used the 2011 Census vacant homes measurement to convert households to dwellings whereas LPEG recommends using the latest Council Tax Base and also adjusting it down to the national average if appropriate to 'encourage bringing empty homes back into use'. Any effect due to this is likely to be negligible so it has not been considered in this report.

3. Employment Trends

3.1. Balancing jobs and workers

The 2015 SHMA concludes that a shortfall of 7,800 workers would arise over the 22 year plan period based on the level of household growth. The level of jobs growth is derived from a forecast model by Oxford Economics. The growth in number of workers is calculated by looking at the proportion of the projected population increase that are economically active. This has reference to participation rates by sex and age and takes into account factors such as the changing state pension age and school leaving age. According to the analysis in the 2015 SHMA, this shortfall in workers translates into a requirement for an uplift of 5,600 additional homes in the HMA.

In the overall conclusions on OAN, this is dealt with as part of the market signals uplift rather than a separate increase. We would dispute whether these should be considered collectively rather than as cumulative effects, but the issue may now be moot as the imbalance between jobs and workers is not present in the 2016 SHMA Update. The increased population growth resulting from using the 2014-based projections covers the amount of workers previously expected. No new modelling on employment growth has been carried out so this is potentially not a very robust assumption; we would recommended further analysis to ascertain whether the additional population generates further economic growth and therefore a higher workforce requirement.

3.2. Commuting balance

The assumptions on jobs and household growth in the 2015 SHMA lead to a large increase in both in- and out-commuting to and from the HMA. Given the proximity of London and its strong links to the HMA, reducing out-commuting would be very difficult, but housing the in-commuting workers in the HMA could be done if more household growth was provided for.

An increase in net in-commuting of 500 workers (over the 22 year plan period) is forecast, mainly due to the expansion of Stansted Airport. In the interests of sustainability, we propose that all additional workers should be housed locally and the volume of in-commuting kept constant rather than the proportion. In addition, the assumption that jobs can be filled by in-commuters has been used by other nearby assessments (e.g. Cambridge and South Cambridgeshire), and clearly can't work in practice if a series of neighbouring HMAs are expecting to do the same thing.

The jobs growth forecast for the HMA suggests that 12,000 additional in-commuters will be drawn in over the 22 year plan period, when in the absence of major infrastructure upgrades it would surely be preferable to house these workers locally. There is no district breakdown so, assuming each district takes a share equal to its overall share of need, this equates to:

- **2,942** additional in-commuters in Epping Forest
- 4,270 in East Hertfordshire
- 1,536 in Harlow
- 3,253 in Uttlesford

At HMA level the SHMA states that 7,800 additional workers translates to a requirement for 5,600 dwellings. Keeping the workers to dwellings ratio constant, the additional in-commuters in each district is equivalent to:

- **2,112** additional dwellings in Epping Forest
- 3,066 in East Hertfordshire
- 1,103 in Harlow
- 2,336 in Uttlesford

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The 2016 SHMA update does not include a detailed update of the economic growth analysis, so it is not possible to review whether the relationship between jobs and homes has been assessed correctly. Reviewing the evidence from the 2015 SHMA suggests that there may be a case for providing additional homes to house local workers of the order of **8,617 dwellings** across the plan period for the whole HMA. We are aware that the East of England Forecasting Model has been updated for 2016 and may be a useful resource regarding modelling economic growth in any future analysis.

3.3. Notes on LPEG approach

The LPEG recommendations suggest moving the analysis of economic growth outside the OAN calculations, and dealing with it as part of the 'policy on' choice made in setting the housing target. For that reason we will consider this adjustment part of our suggested range rather than an essential component of the OAN.

4. Market Signals

The 2015 SHMA report contains a large amount of information on the housing market including house prices, rents and affordability. It recognises that the strength of the local market is such that the level of OAN requires an increase from the baseline delivery established with reference to demographic projections.

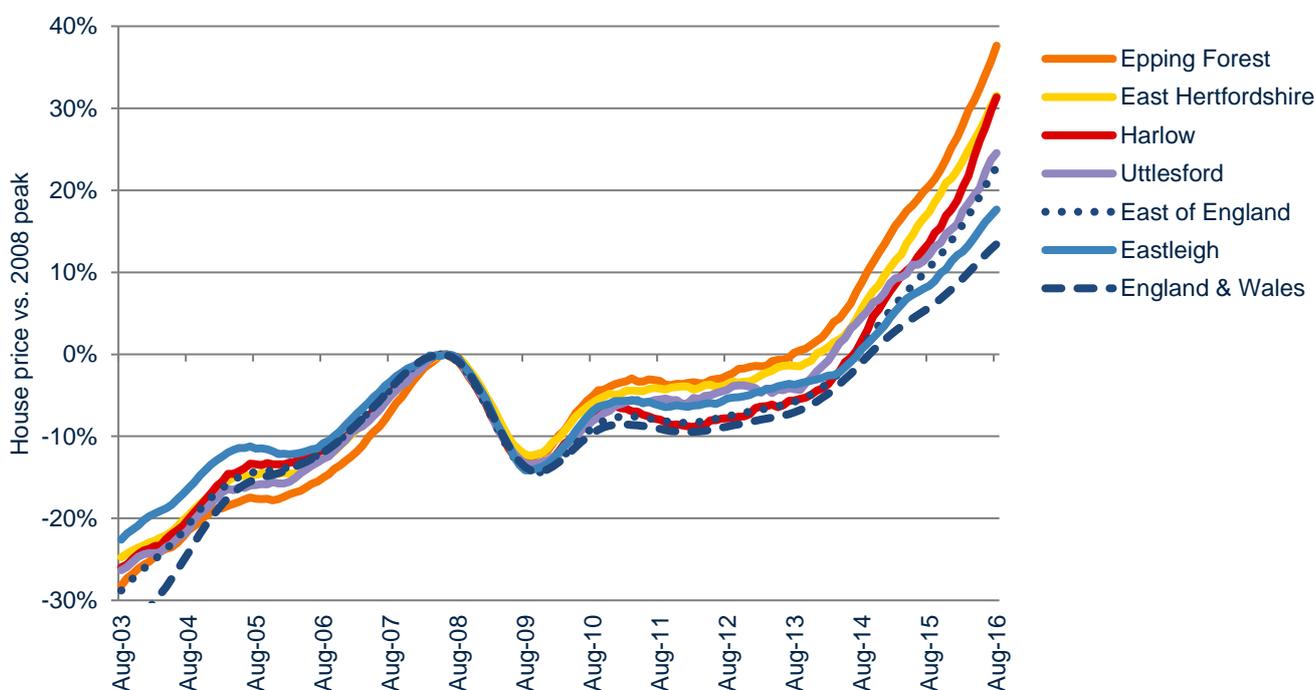
An uplift of 20% was proposed in the 2015 SHMA on the basis of the Inspector’s decision that a 10% uplift was appropriate at Eastleigh BC, and it has been applied across the whole HMA. The uplift for Eastleigh is the only comparison used in the SHMA, despite being in a different part of the country and well outside the London commuter belt – in summary not very similar to the HMA and in particular Epping Forest, which is a very strong market. The market signals analysis has not been refreshed as part of the 2016 SHMA update.

A brief review of key indicators (house prices, affordability and rate of development) is carried out below and suggests that 20% uplift was insufficient uplift in 2015, and that the evidence suggests a further worsening since then. A full review of all six components of market signals (as set out in PPG Chapter 19) using up-to-date evidence should be carried out to confirm the latest position.

4.1. House prices

Figure 7 below looks at house prices over the current cycle (i.e. indexed back to the 2008 peak), for the four districts in the HMA, regional and national comparators, and Eastleigh. On this basis they are all much stronger markets than Eastleigh, East of England, or England & Wales.

Figure 7 – House price indices



Source: Savills Research using Land Registry

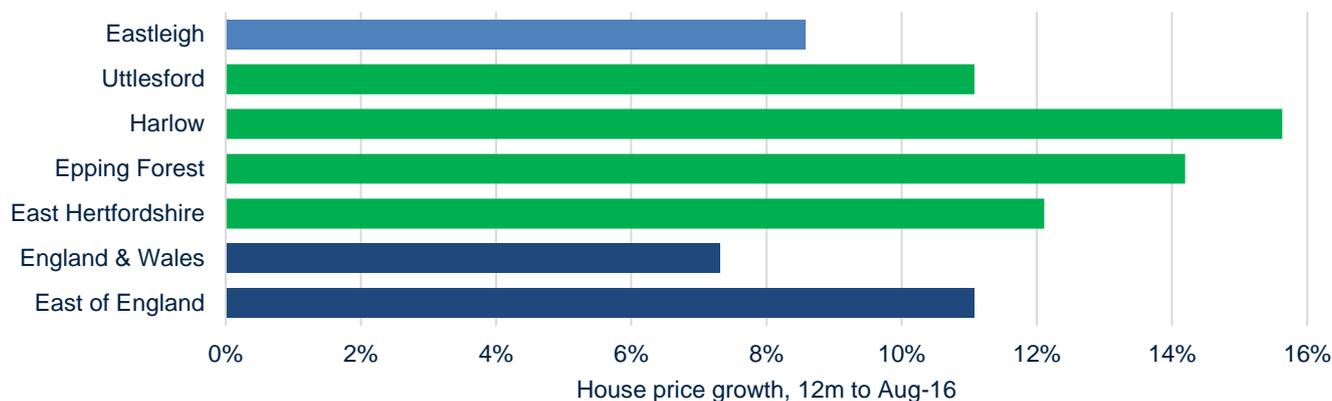
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Over a shorter period, again all four HMA districts appear stronger than the comparators, with Harlow having seen the most growth in the past year.

Figure 8 – Annual house price growth

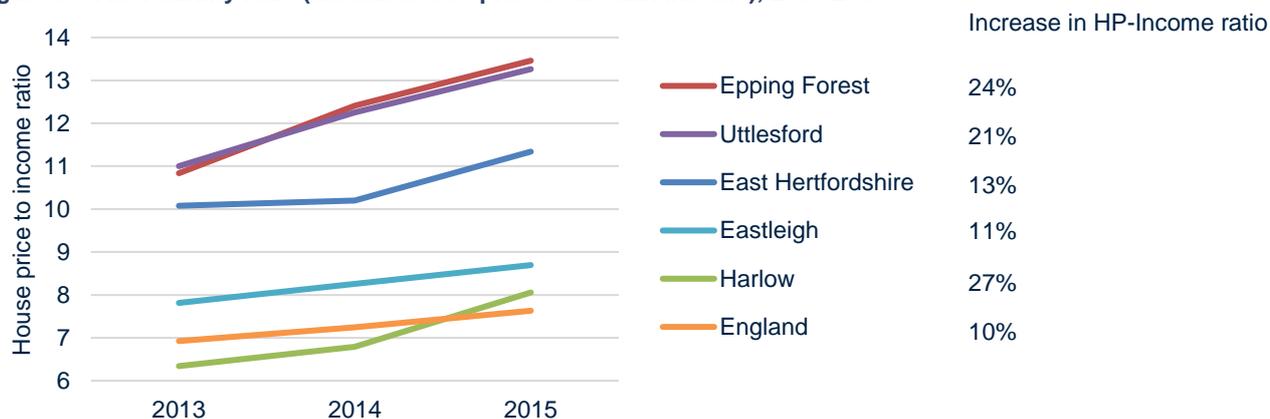


Source: Savills Research using Land Registry

4.2. Affordability

The picture with affordability is similar to house prices. All four districts are less affordable than the national average, and only Harlow is below Eastleigh on the measure. Over the three years for which there is robust data (note that DCLG do publish older data but using a different calculation method), affordability has worsened much more in the HMA than in Eastleigh or England.

Figure 9 – Affordability ratio (median house price to median income), 2013-2015



Source: DCLG LT 576-578

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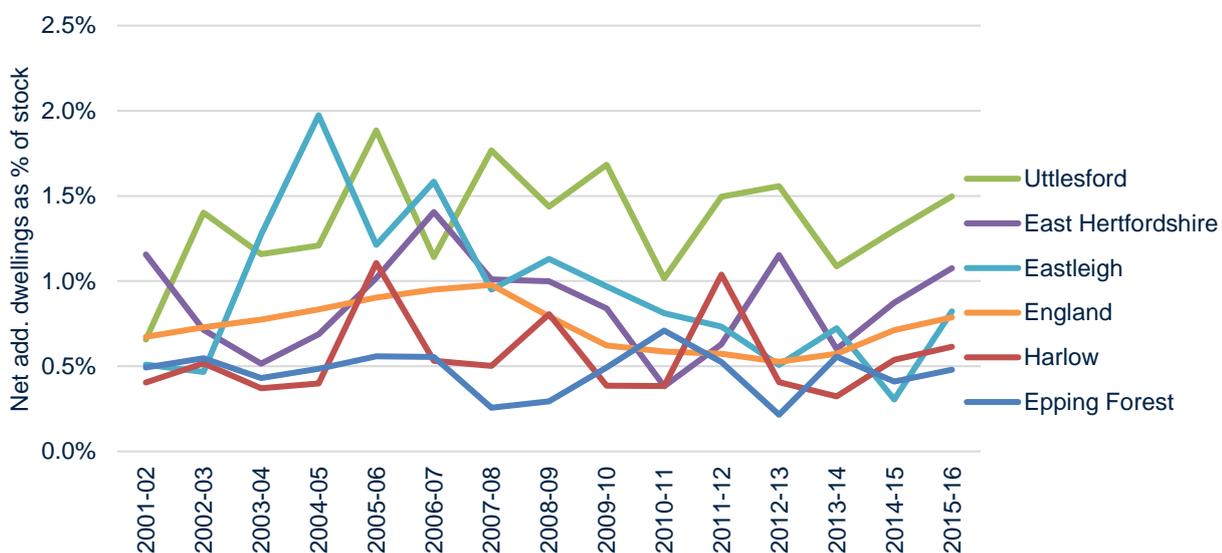


4.3. Rate of development

Figure 10 shows the annual change in dwelling stock in each district. For context, Eastleigh has delivered 14.9% additional stock over the full 15 years for which data is available and England has grown by 11.6%. In addition, about 1% of dwelling stock would have to be added each year to keep pace with 2014-based household projections at a national level.

The four districts of the HMA have fared quite differently on this measure. Uttlesford can be categorised as a high delivery market, having expanded its dwelling stock by 22.3% over the past 15 years. East Herts has shown average delivery rates, of 13.9% over the 15 years. Epping Forest and Harlow are both low delivery markets, at 7.2% and 8.7% respectively over the same period.

Figure 10 – Net additional dwellings delivered as % of stock, 2001-2016



Source: DCLG LT 122, LT 100

4.4. Summary

The official guidance on scale of uplift is not clear, suggesting only that it should be 'reasonable' and sufficient to be 'expected to improve affordability'. The evidence above shows that the districts of the HMA have significantly higher affordability pressures than the national average and compared to Eastleigh, the single comparator chosen in the 2015 SHMA. Epping Forest is particularly unaffordable and has seen very low levels of supply over a sustained period. Paragraph 19 of the PPG states:

"If the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan."

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The 2015 SHMA suggested a 20% uplift was appropriate for the whole HMA and this was retained in the 2016 update, but there is no evidence to show whether this would have any impact on affordability. Other SHMAs are similarly lacking in evidence to justify their proposed uplifts. We concede that it is very difficult to quantify the impact of increased housing supply on affordability as it has never been achieved over a wide geographical area for a sustained period. One useful resource is the academic Glen Bramley's review of the 2015 Wider Bristol SHMA³, which concluded that "the SHMA is quite wrong to suggest that a 7.5% uplift in plan numbers is an appropriate response to market signals, when a more appropriate response would be in the range **35-60%**." (This covers the districts of the City of Bristol, North Somerset and South Gloucestershire.)

At a national level the academic evidence, including the 2014 update of the Barker Review⁴, suggests that a figure of around 260-320,000 new homes per year would be needed over a sustained period to significantly improve affordability. As part of our annual planning research publication⁵, we devised a series of uplifts based on splitting local authorities into house price and rental affordability bands (expanding upon the idea introduced in the LPEG recommendations) to reach a cumulative OAN for England of approximately 300,000. Note: our method puts Bristol at 40%, in line with the lower end of the range proposed by Glen Bramley.

On our measure, East Herts requires an uplift of 40%, **Epping Forest 50%**, Harlow 30%, and Uttlesford 50%. While not a thorough or perfect method, it is at least grounded in the limited available academic evidence. For the sake of simplicity we would suggest applying 40% across the whole HMA rather than having differential rates, so this could be a conservative estimate for Epping Forest. Adding this to the revised demographic baseline from Table 3 takes the total dwelling requirements to the following:

Table 4 – Accounting for market signals

	2011-33			
	Whole HMA		Epping Forest	
	Plan Period	Per Annum	Plan Period	Per Annum
Demographic starting point (dwellings)	55,206	2,509	15,942	725
40% uplift	+22,082	+1,004	+6,377	+290
Including market signals adjustment	77,304	3,514	22,319	1,014

Source: Savills Research (figures may not sum due to rounding)

4.5. Notes on LPEG approach

The LPEG approach, applying uplifts based on affordability ratios, forms the basis of the method we have used above. Under the proposed LPEG system Epping Forest would be in the highest uplift band and OAN would be increased by 25%. However, under the LPEG proposal there is no clear evidence for the banded uplifts chosen and no overall target national OAN to reach, so we have modified the structure to reach a total need figure that various academics have suggested is the correct order of magnitude needed to improve affordability, with more differentiation between local authorities with varying market pressures.

³ <http://initiativewest.co.uk/wp/wider-bristol-housing-market-area-strategic-housing-assessment-2015-commentary/>

⁴ <http://www.hbf.co.uk/policy-activities/news/view/barker-review-10-years-on/>

⁵ <http://pdf.euro.savills.co.uk/uk/residential---other/spotlight-planning-summer-2016.pdf>

5. Affordable Housing Needs

The 2015 SHMA report concludes that any increase in housing target with the aim of delivering more affordable housing would be a policy decision, rather than part of the OAN calculation. Therefore there is no analysis to review here.

5.1. Notes on LPEG approach

The LPEG method suggests a simple 10% uplift (applied to the demographic starting point) if the affordable housing need calculated is unable to be met “given the probable percentage of affordable housing to be delivered by market housing led developments”.

The affordable housing needs of the whole HMA were calculated as 13,600 dwellings over the plan period, which is 18% of the OAN we have proposed in Table 4. In Epping Forest the affordable housing need is 3,200 homes over the plan period, which is 14% of the OAN we have proposed in Table 4. These levels of affordable housing should be viable so the additional uplift would not be needed in this case.

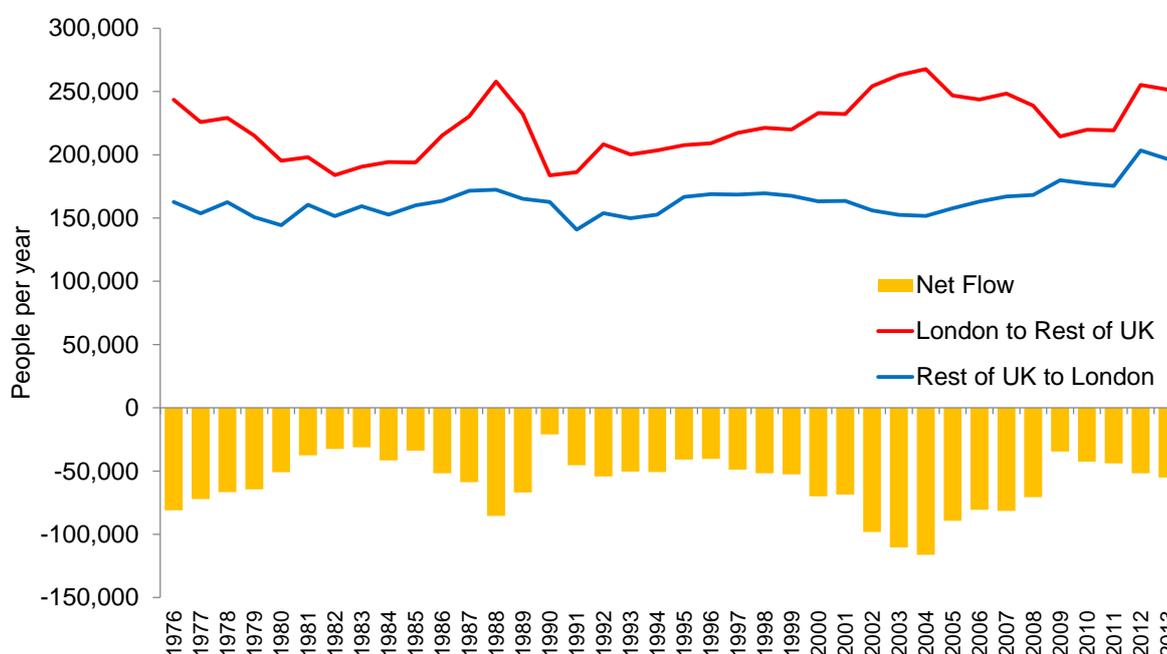
6. London Overspill

The question of whether London can meet its housing needs is of great importance across the wider south of England. The evidence in London suggests that it is limited by land constraints and can only meet housing need of 42,000 per annum. Meanwhile the London SHMA estimated that potential household formation is in the region of 49,000 to 62,000 per annum (depending on how backlog is accounted for). Taking a mid-point of 55,500 suggests that there could be around 13,500 households seeking housing outside of London every year in addition to the normal trend. Recent domestic migration data shows that increasing numbers of people are moving out of London following the credit-crunch led slowdown. With house prices in London at record highs relative to the rest of the country, the pressure on potential households to move out will continue to increase.

Although not a perfect indicator given it is only a snapshot of a single year, and that it measures people rather than households, 2015 ONS internal migration data shows that 283,000 people moved out of London in the year to June 2015. Of those, 8,890 moved to the East Herts and West Essex HMA, and the destination for over half of those (4,570) was Epping Forest. If we assume the same proportions, then that would imply that the HMA would need to house an additional 424 of the 13,500 households every year that London cannot; Epping Forest's share of this would be **218**.

There may well already be overlap between this figure and the number of people already moving, but there is no explicit acknowledgement in the Draft Local Plan that London cannot meet its own need and that this could add to the housing requirement in the HMA set out in the SHMA. This is a significant weakness and is a clear avenue for further detailed modelling.

Figure 11 – London Domestic Migration (historic trend)



Source: ONS

7. Conclusions

Our approach in this report has been to review the OAN proposed by the latest 2016 SHMA update (which includes revisiting some of the content of the 2015 SHMA), highlighting areas of weakness and making suggestions for alternative calculations where appropriate. We have also considered how the proposed LPEG recommendation may affect the OAN calculation. In conclusion, our analysis of full objectively assessed housing need is shown below:

Table 5 – Calculating full objectively assessed housing need

All calculations cover full 22 year plan period, 2011-33	Whole HMA		Epping Forest	
	Plan Period	Per Annum	Plan Period	Per Annum
Baseline from 2016 SHMA Update	43,759	1,989	10,568	480
Reverse 10 year migration adjustment	+6,938	+315	+3,806	+173
Supressed household formation adjustment	+2,388	+109	+852	+39
Savills suggested baseline (households)	53,085	2,413	15,226	692
Convert to dwellings	55,206	2,509	15,942	725
40% market signals uplift	22,082	1,004	6,377	290
Minimum OAN	77,304	3,514	22,319	1,014
Potential impact of balancing commuting	+8,617	+392	+2,112	+96
Potential impact of dealing with London overspill	+9,306	+423	+4,796	+218
Potential OAN	95,227	4,329	29,227	1,328

Source: Savills using ONS, DCLG (figures may not sum due to rounding)

The minimum figures alone are a very significant increase on those proposed in the 2016 SHMA update, +42% across the HMA. For Epping Forest, the housing requirement increases by 68%. Table 6 compares all the proposed housing need figures just for Epping Forest.

Table 6 – Summary of proposed housing requirements

	2011-33	Per annum
2015 SHMA	11,300	514
2016 SHMA Update	13,278	604
EFDC Draft Local Plan	11,400	518
Savills Minimum OAN	22,319	1,014

Source: Savills Research, council evidence

The proposed levels of housing growth in the draft Local Plan of 11,400 new homes in Epping Forest over the plan period does not meet the need set out in the 2016 SHMA update and is well below the minimum we have identified. It is therefore unlikely to be appropriate unless provision elsewhere is made to deal with unmet need. We therefore conclude that there are flaws in the evidence base for setting the housing target and suggest it is reviewed again. In addition, the planned under-provision in the London Plan and the very strong migration and commuting links between the capital and the HMA mean that it could be a candidate location for dealing with overspill demand from London, increasing the OAN further.

8. Important Note

Finally, in accordance with our normal practice, we would state that this report is for general informative purposes only and does not constitute a formal valuation, appraisal or recommendation. It is only for the use of the persons to whom it is addressed and no responsibility can be accepted to any third party for the whole or any part of its contents. It may not be published, reproduced or quoted in part or in whole, nor may it be used as a basis for any contract, prospectus, agreement or other document without prior consent, which will not be unreasonably withheld.

Our findings are based on the assumptions given. As is customary with market studies, our findings should be regarded as valid for a limited period of time and should be subject to examination at regular intervals.

Whilst every effort has been made to ensure that the data contained in it is correct, no responsibility can be taken for omissions or erroneous data provided by a third party or due to information being unavailable or inaccessible during the research period. The estimates and conclusions contained in this report have been conscientiously prepared in the light of our experience in the property market and information that we were able to collect, but their accuracy is in no way guaranteed.