Market Signals
Housing Evidence Base Briefing Note 24 (BN24)

Summary

The NPPF is clear that in order 'to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area'.

National Planning Practice Guidance states that 'household projections published by the DCLG should provide the starting point estimate of overall housing need…….the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.'

An assessment of market signals in Cornwall has identified that there are two indicators that are significantly different to other comparator areas and might suggest that the housing requirement be adjusted upwards:

- **Concealed Families** – the proportion of concealed families in Cornwall is higher (1.7%) than that of the other local authorities (Devon 1.5% and Wiltshire 1.1%) in the South West and of the South West regional average (1.4%). It is considered reasonable to adjust the housing requirement upwards by some 500 dwellings as this would 'theoretically' reduce the proportion of families that are concealed in Cornwall down to the South West average (i.e. instead of their being 1.7% of families concealed there would be 1.4%).
- **Households in Caravans or Other Mobile or Temporary Structures** - the proportion of households in 'temporary' accommodation Cornwall is higher (1.7%) than that of the other local authorities (Devon 0.9% and Wiltshire 1%) in the South West and of the South West regional average (1%). However, further work in Cornwall has identified that this reflects a higher than average number of park homes schemes. These schemes benefit from lawful use and or planning consent and any increase in the housing need figure therefore would not be required.

In addition, the high proportion (11.2%) of unoccupied household spaces, mainly second and holiday homes that are a feature of the Cornwall housing market will also have an impact on the availability of homes for future households. It is therefore sensible that we plan for a number of new dwellings to meet this 'ongoing need' in addition to that planned to meet future household growth, and it is considered reasonable to adjust the housing requirement upwards by some 7%. This is in addition to the 3% uplift on the housing requirement figure that accounts for empty homes and vacant properties associated with 'market churn'.

The range of economic projections required is in line with the demographic options adjusted for market signals and second homes and does not require any further adjustment.

Key Outcomes

The proportion of concealed families in Cornwall is higher than in comparator authorities, and suggests that the housing requirement be adjusted upwards by some 500 dwellings.

The proportion of household spaces that are unoccupied in Cornwall is higher than in comparator authorities, and suggests that the housing requirement be adjusted upwards by some 7%.

'Market churn' requires the housing requirement to be adjusted upwards by 3%.

Source: Census, Cornwall Council, SHMNA

National Policy Context

The National Planning Policy framework[i] (NPPF) in paragraph 49 makes it clear that in order 'to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area'. A Strategic Housing Market Needs Assessment[BN2] is advocated as the means by which the full need for housing is determined.

National Planning Practice Guidance (NPPG) on the 'Housing and Economic Development Needs Assessment'[ii] supports local planning authorities in objectively assessing and evidencing development needs for housing (both market and affordable). This guidance states that 'household projections published by the DCLG should provide the starting point estimate of overall housing need…. The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.'

In terms of market signals, NPPG guidance suggests that authorities may include:

- Land Prices;
- House Prices;
- Rents;
- Affordability;
- Rate of Development;
- Overcrowding, concealed and sharing households, homelessness and the numbers in temporary accommodation.

NPPG guidance goes on to state that 'appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the housing market area, similar demographic and economic areas and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections…. In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable….'

The guidance goes on to suggest that 'the list of indicators above is not exhaustive. Other indicators, including those at lower spatial levels are available and may be useful in coming to a full assessment of prevailing market conditions.'

Local Context

There is evidence that Cornwall is experiencing a housing market under pressure along with the rest of the Country. In Cornwall, house prices[BN14] are high and local incomes and earnings[BN17] are low, population[BN3] and households[BN4] are expected to continue to rise in number and the number of people applying to the local Housing Register[BN10] has more than doubled over the last ten years. An additional factor that is not applicable to the majority of areas in England is that local home buyers in Cornwall face additional competition from potential second home owners[BN11] in accessing housing. Cornwall needs to build more houses[BN6] to meet the needs of the local community and its future households.

Comparator Authorities

The specific authorities that are used as comparators to Cornwall to identify any worsening trends in market signals are as follows. A comparison will also be made to the regional and national figures wherever possible to set a wider context:

- Devon – a county authority in the South West and neighbouring authority;
- Wiltshire – a county authority in the South West which became a unitary in 2009 at the same time as Cornwall;
- Plymouth – as one of Cornwall's partner SHMNA authorities and neighbouring authority;
- South Hams – as one of Cornwall's partner SHMNA authorities;
- West Devon - as one of Cornwall's partner SHMNA authorities and neighbouring authority.

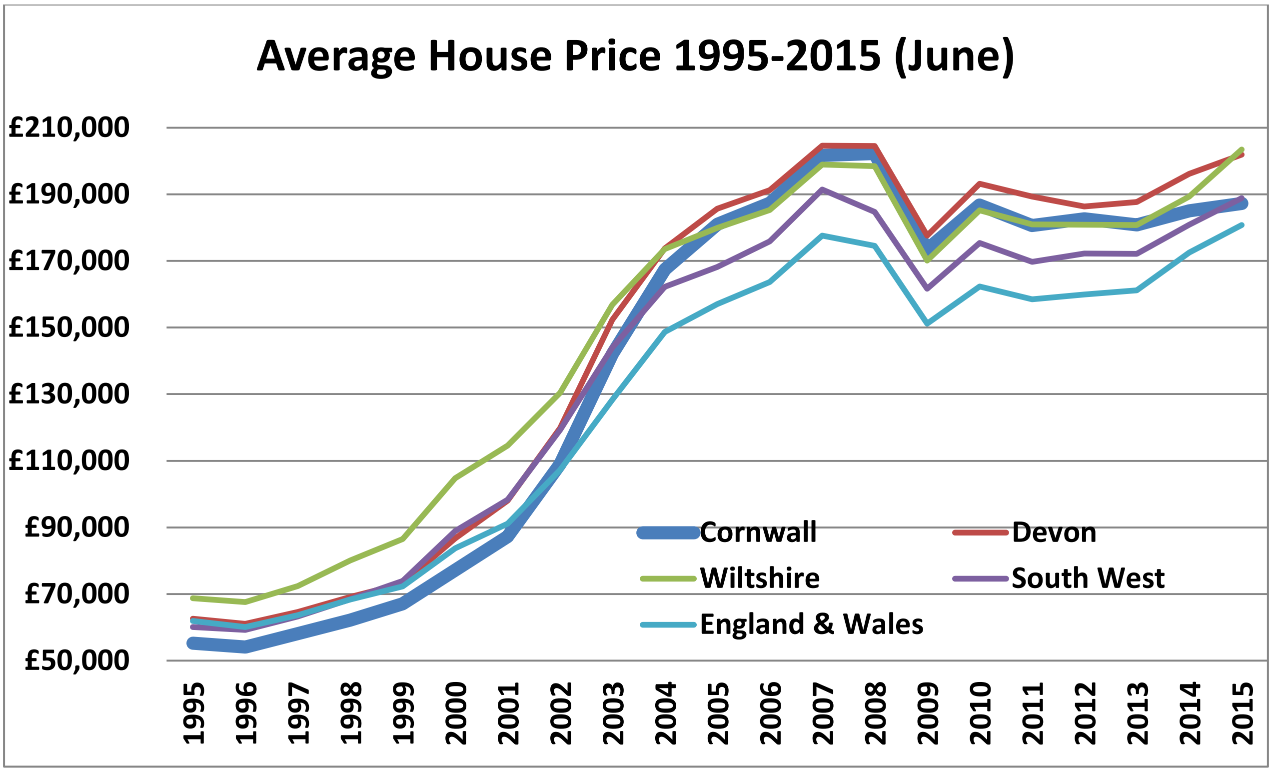
Market Signal - Land Prices

Cornwall Council has no access to land prices data that could be used to specifically identify how Cornwall compares to other areas in the South West to assess whether or not there are any significant differences. It is recognised that land prices would form a constituent part of the overall house price which is considered below – the conclusion to the section on house prices is that Cornwall is not significantly different.

As a consequence the Council considers that land prices should not be regarded as a factor that could indicate that the housing requirement be increased.

Market Signal - House Prices

BN14 House Prices & Affordability[iii] provides detailed information on how Cornwall compares to other authorities and the South West of England. The graph below summarises average house prices[iv] for Cornwall, Devon, Wiltshire, the South West and England & Wales. As shown, Cornwall's average house prices have moved closer to those of Devon and Wiltshire (although generally still lower), and rose above the national and regional averages around 2002 to 2003.

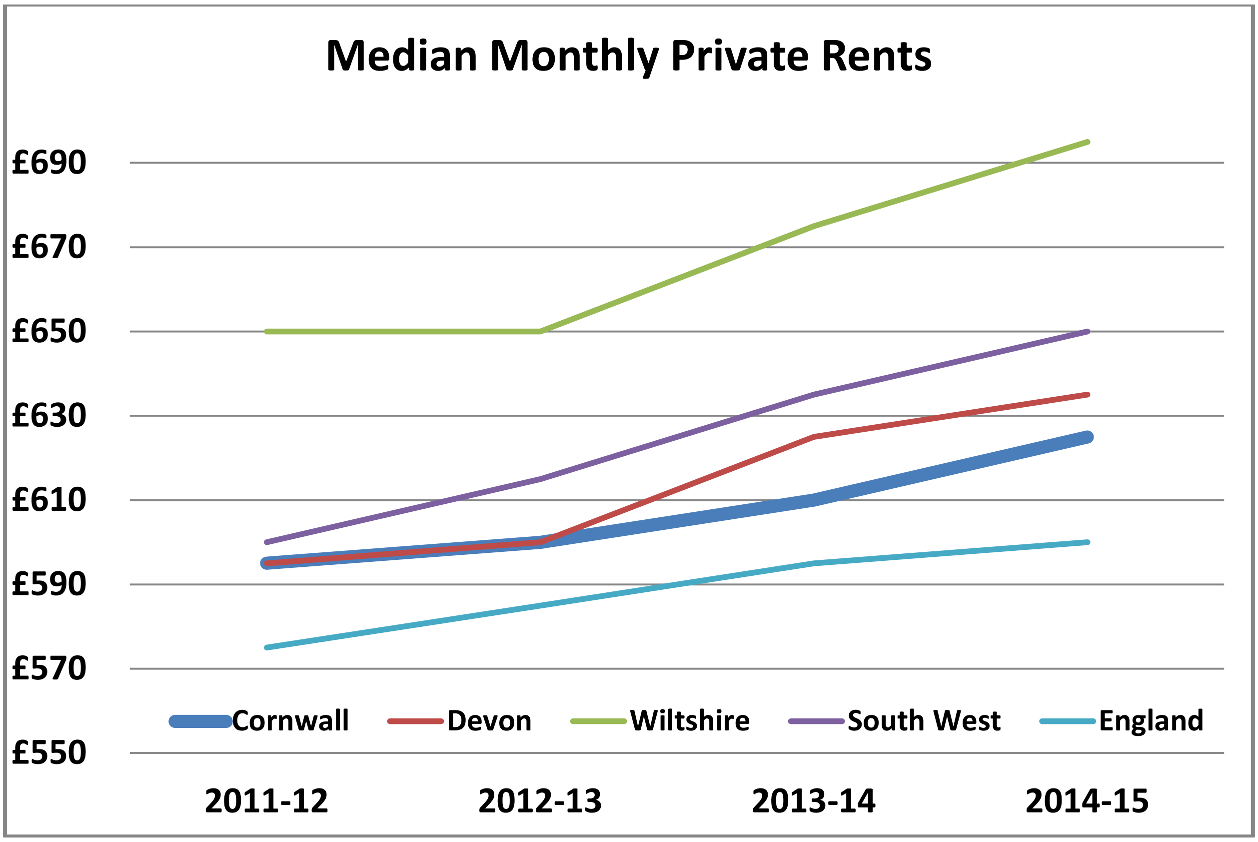


Since 1995, house prices in Cornwall have increased by 235% which is at a slightly higher rate than other authorities in the South West (Devon 213% and Wiltshire 175%) and the South West average (201%) but started from a much lower rate. Cornwall's average house price was £55,292 in 1995 compared to £62,644 in Devon and £68,737 in Wiltshire. In June 2014 the average house price in Cornwall was £185,006 compared to £196,148 in Devon and £189,311 in Wiltshire. Only data for the City of Plymouth is available in terms of the SHMNA authorities and the increase between 1995 and 2014 in house prices was 170%.

What is clear from this assessment is that average house prices in Cornwall do not show any significant differences to the pattern demonstrated by the other areas assessed and as such house prices should not be considered a factor that could lead to an increase in the housing requirement as currently identified.

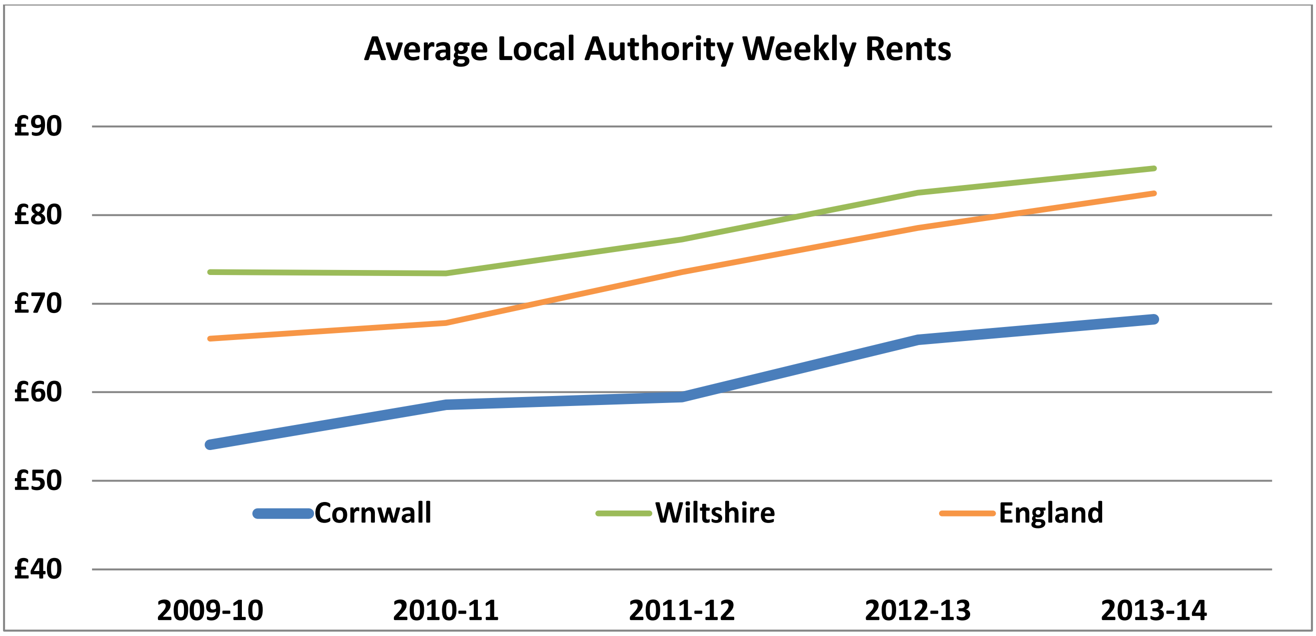
Market Signal - Rents

Long term private rental data is generally not available. BN16 the Private Rented Sector[v] provides detailed information on how Cornwall compares to other comparator authorities and England. The graph below summarises available data on median monthly private market rents[vi] for Cornwall, Devon, Wiltshire, the South West and England. As shown, Cornwall's median monthly rent over the last three years of data is similar to that of Devon and the South West average, quite a bit lower than that of Wiltshire and higher than the average across England.



Since 2011/12, median private rents in Cornwall have increased by 5% which is at a slightly lower rate than other authorities in the South West (Devon 6.7% and Wiltshire 6.9%) and the South West average (5.8%). Cornwall's median private rent in 2014/15 was £625 compared to £635 in Devon and £695 in Wiltshire. Data available on median private rent increases in terms of the SHMNA authorities shows increases of 10.8% for the City of Plymouth, 14.2% for South Hams and 8.2% for West Devon, indicating that Cornwall has seen the lowest rise in private rents of the authorities in the local housing market area.

Long term local authority rental data is generally not available. BN10 on affordable housing[vii] provides detailed information on how Cornwall compares to other comparator authorities and England. The graph below summarises average weekly local authority rents[viii] for Cornwall, Wiltshire and England (data for Devon and the South West is not available). As shown, Cornwall's average social weekly rent over the last five years of data is lower than that of Wiltshire and the England average.

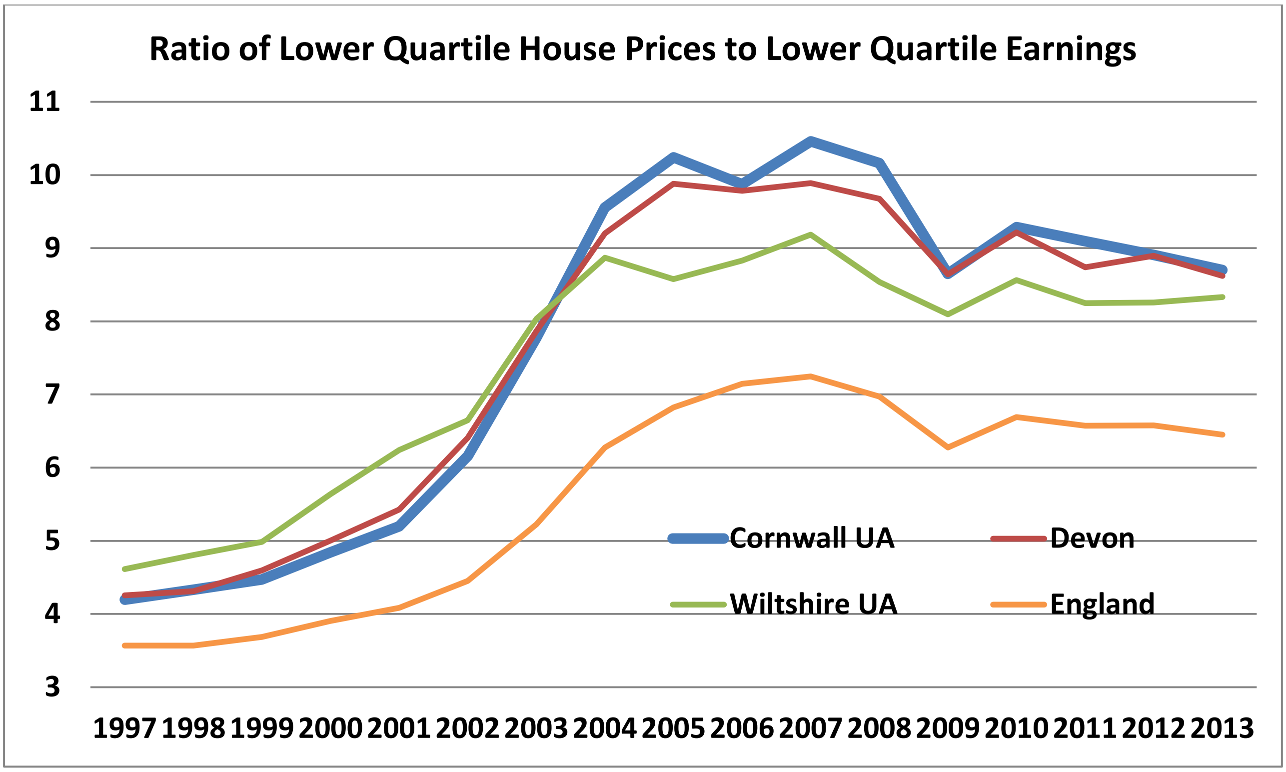


Since 2009/10, the average local authority weekly rent in Cornwall has increased at a higher rate (26%) than for Wiltshire (16%) but started from and remains at a much lower rate – the increase on average across England is similar at 25%. In 2013/14 the average local authority rent in Cornwall was £68.22 compared to £85.27 in Wiltshire and £82.44 in England. Data on average local authority rents in the SHMNA authorities is not available.

What is clear from these two graphs is that both private and local authority rents in Cornwall do not show any significant differences to the pattern demonstrated by the other areas and are generally lower than in the comparator areas. As such rents should not be considered a factor that could lead to an increase in the housing requirement as currently identified.

Market Signal - Affordability

BN14 House Prices & Affordability[ix] provides detailed information on how Cornwall compares to other authorities in the South West and England. The graph below summarises the affordability of housing[x] (the ratio of lower quartile house prices to lower quartile earnings) for Cornwall, Devon, Wiltshire and England. As shown, Cornwall's affordability ratio has always been similar to that of Devon over the long term, although it did become slightly higher between 2004 and 2008. Affordability in Wiltshire started off higher than that for Cornwall and Devon but has since reduced and all three areas have in recent years very similar affordability ratios.



Since 1997, the affordability ratio for Cornwall has increased from 4.2 to 8.7 (107%) which is a slightly higher rate of increase than other authorities in the South West (Devon 4.26 to 8.62 [102%] and Wiltshire 4.61 to 8.33 [81%]). In terms of Cornwall's partner Strategic Housing Market Needs Assessment authorities, Plymouth's affordability ratio increased from 3.23 to 5.95 (84%), South Hams from 4.9 to 10.46 (114%) and West Devon 5.2 to 9.52 (83%).

What is clear from this graph is that affordability in Cornwall does not show any significant differences to the pattern demonstrated by the other South West areas, and the Council considers that affordability should not be considered a factor that could lead to an increase in the housing requirement as currently identified.

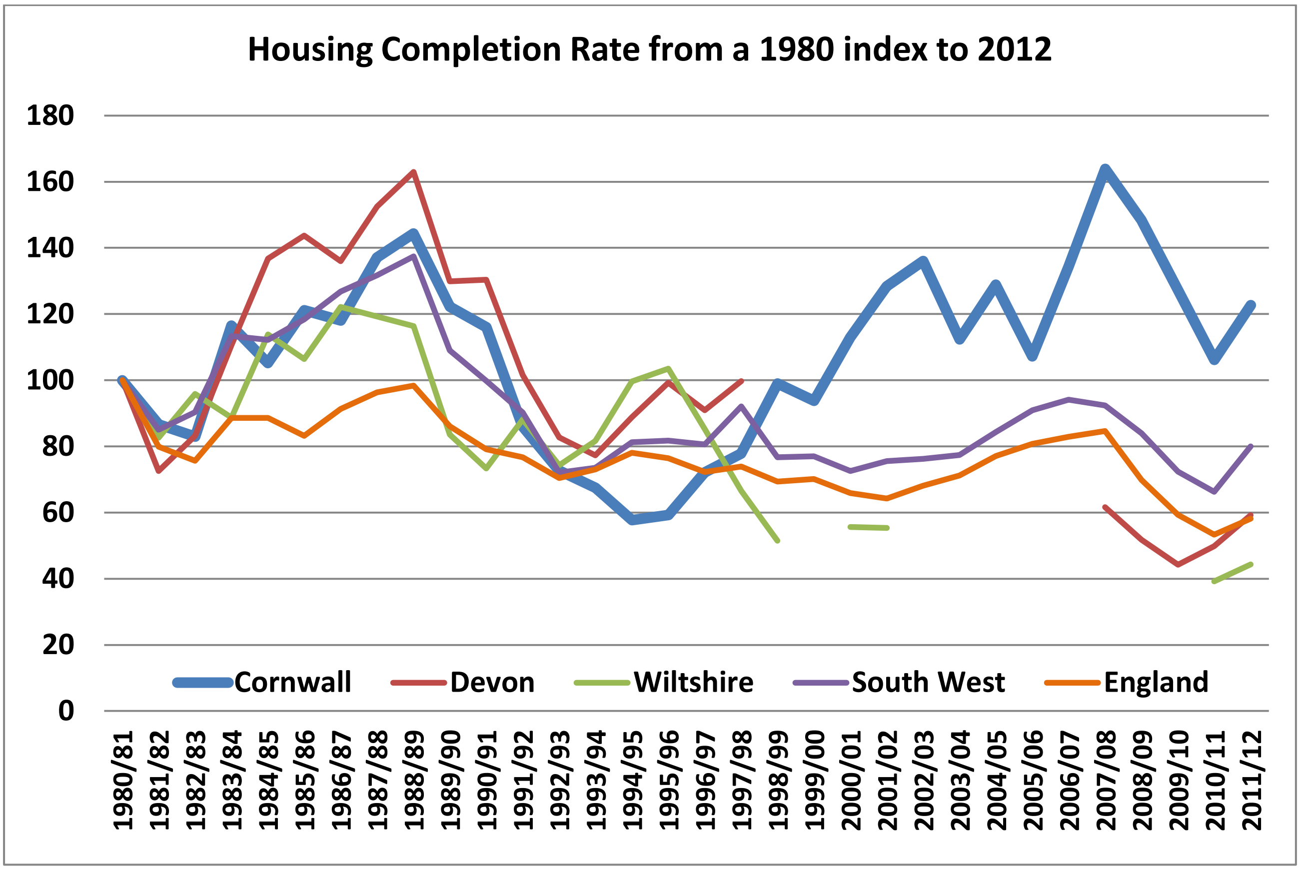
Market Signal - Rate of Development

BN8 Deliverability and the Strategic Housing Land Availability Assessment[xi] provide detailed information on how Cornwall has delivered against previous and current housing targets, and how the area is expected to perform in the future. In summary:

- In terms of historical rates of delivery, the long term average is 2,271 dwellings delivered per year since 1976. Looking at other time frames, on average 2,250 new homes have been delivered over the last twenty years, 2,470 per year over the last ten years and from the start of the current Local Plan period there has been an annual average delivery rate of 2,296 new homes.
- In previous years it was 'evident that in most cases building rates have exceeded the anticipated Structure Plan rates and it is likely that the Structure Plan provision will be exceeded before the end of the plan period[xii]'.
- In terms of current delivery there is no adopted housing requirement for Cornwall but the Proposed Submission Local Plan identifies a target of 47,500 which equates to a requirement of 2,375 dwellings being delivered p.a. There is a current shortfall of some 396 dwellings after the first five years of the plan period but this under–delivery to date can be said to be as a consequence of the recent recession. The

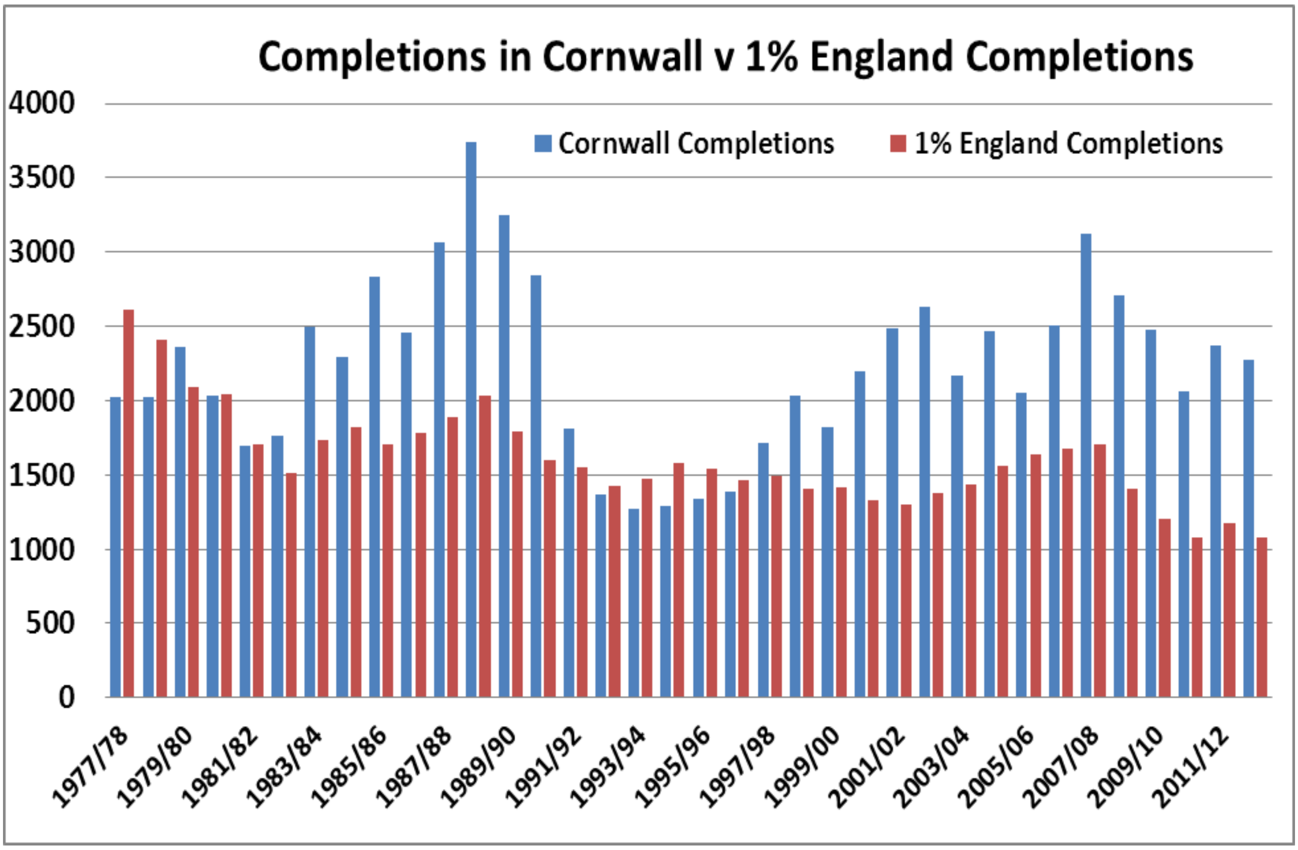
delivery rate is already showing signs of improvement and is expected to continue to improve over the plan period unless factors emerge that are outside of the control of local planning (e.g. another economic downturn).

Both the NPPF and the NPPG refer to the need to boost the supply of housing, and generally refer to the persistent 'under supply' of housing across England that has been a feature of the past few decades. This issue has been explored in detail in BN15 Housing Under-Supply[xiii] which concludes that in comparison to the pattern of delivery experienced by comparator authorities (some data missing), the South West and England over a long time period using 1980 figures[xiv] as the index of 100, Cornwall[xv] cannot be said to have constrained the delivery of housing as shown in the graph below:



As shown, Cornwall's completions rate from 1980 to the late 1990's was similar to that of Devon, Wiltshire and the South West average but since this time delivery in Cornwall has been significantly higher than the rate for all the other areas assessed. What is clear from this graph is that deliverability in Cornwall has been consistently better than all the other areas assessed apart from a four year period in the early 1990's.

An alternative way of looking at delivery rate data[xvi] is to compare completions in Cornwall to completions in England using the fact that 1% of the population of England lives in Cornwall and a similar proportion of households in England are in Cornwall. The graph below shows quite clearly that Cornwall has been delivering more than 1% of total completions in England for much of the period since 1976/77. This confirms that it is reasonable to conclude that delivery in Cornwall has not been constrained in comparison to elsewhere and that no upward adjustment of the demographic housing need target is required.

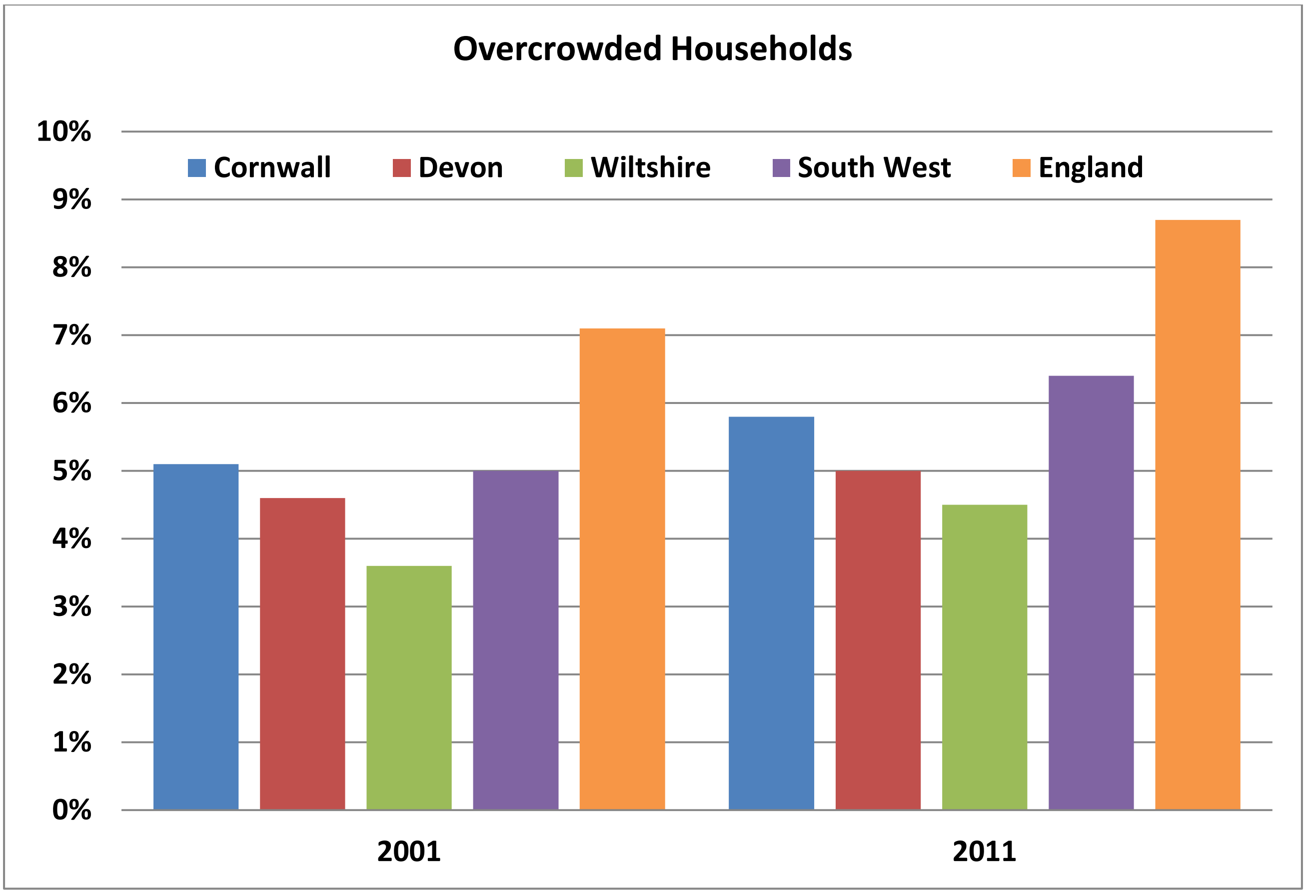


PAS[xvii] guidance is clear that in relation to demographic projections, i.e. household projections, housing targets do not need to be adjusted upwards to account for a persistent under supply of housing as it is reasonable to assume that Cornwall has not generally under supplied the delivery of housing.

Cornwall Council therefore considers that given the evidence available rate of development should not be considered a factor that could lead to an increase in the housing requirement as currently identified.

Market Signal - Overcrowding

BN15 Housing Backlog[xviii] provides detailed evidence on how Cornwall compares to comparator authorities, the South West and England in terms of overcrowding. The graph below summarises overcrowding[xix] for Cornwall, Devon, Wiltshire, the South West and England. As shown, Cornwall's levels of overcrowding are higher than those of Devon and Wiltshire and lower than those for the South West and England averages and have increased at a rate similar to the other areas.



Between 2001 and 2011, the number of households that were overcrowded in Cornwall had increased by 23% compared to Devon (18%), Wiltshire (37%), the South West at 38% and 32% across England. In terms of Cornwall's partner SHMNA authorities the number of households that were overcrowded had increased by 48% in Plymouth between 2001 and 2011, and by 14% in South Hams and 11% in West Devon.

What is clear from this graph is that overcrowding in Cornwall is not significantly different from the other areas assessed and as such the Council considers that overcrowding should not be considered a factor that could lead to an increase in the housing requirement as currently identified.

Market Signal - Concealed Families

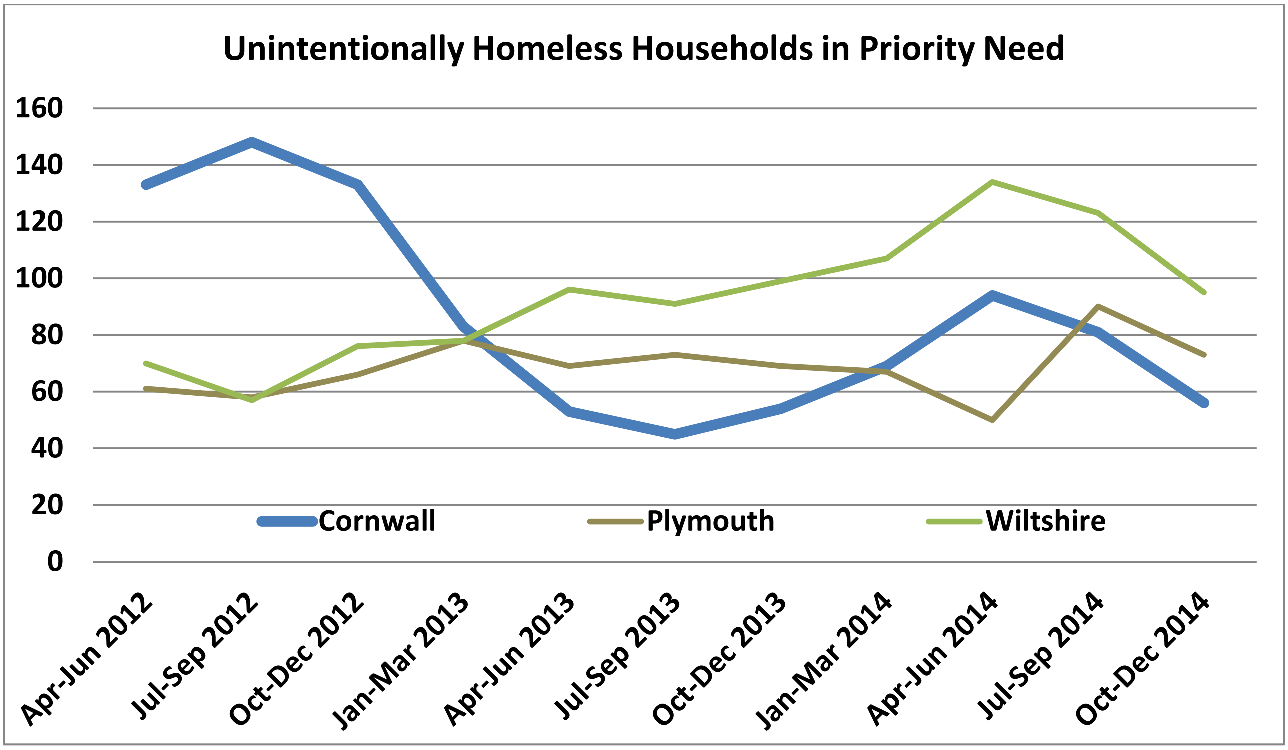
BN28 Concealed Households[xx] provides detailed information[xxi] on how Cornwall compares (1.7% of all families) to the South West average of 1.4% and the England average of 1.8%. In terms of the other comparator areas the level of concealed families in Devon stands at 1.5% and for Wiltshire the figure was 1.1%. Cornwall's partner SHMNA authorities indicate that the number of families that were concealed was 1.3% in Plymouth, 1.3% in South Hams and 1.6% in West Devon.

The figure for Cornwall is slightly higher than for the two other comparator authorities in the South West and the SHMNA authorities. As a consequence the Council accepts that it is reasonable to take this into account when considering if the housing target should be adjusted upwards.

Concealed Households – the proportion of concealed families in Cornwall is higher (1.7%) than that of the other local authorities (Devon 1.5% and Wiltshire 1.1%) in the South West and of the South West regional average (1.4%). It might be considered reasonable to adjust the housing requirement upwards by some 500 dwellings as this would 'theoretically' reduce the proportion of families that are concealed in Cornwall down to the South West average (i.e. instead of their being 1.7% of families concealed there would be 1.4%).

Market Signal - Homelessness

BN10 Affordable Housing Need[xxii] gives some indication of how the housing waiting list has changed by Band over the short term and that the Bands those homeless households would be recorded within has increased over the short term. Using data on households that were unintentionally homeless and in priority need[xxiii] from P1E Cornwall did have a higher level of homeless households than Plymouth and Wiltshire at the start of the assessment. However, the number of unintentionally homeless households in priority need has fallen in Cornwall over the period assessed whereas the number has increased in the other areas.

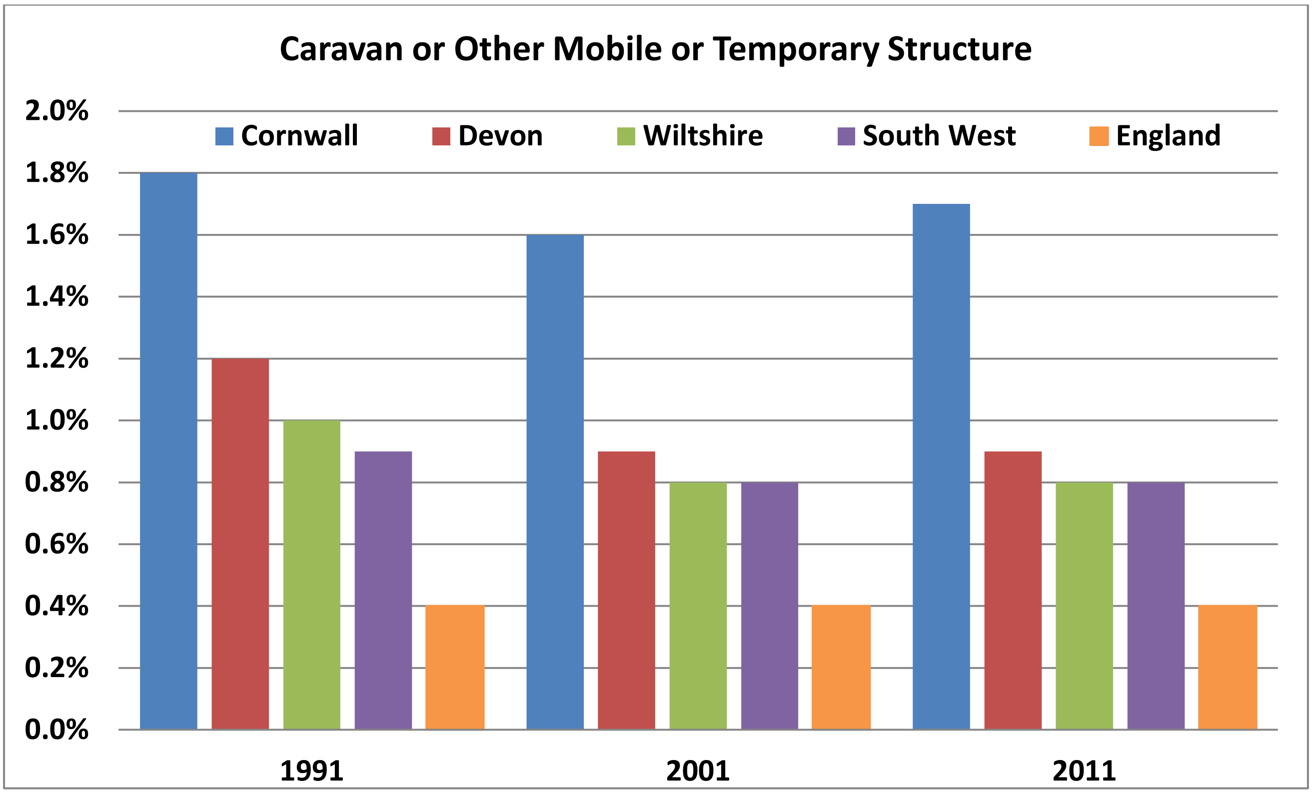


Between April 2012 and December 2014, the number of unintentionally homeless households that were in priority need in Cornwall had decreased (mainly as the result of a new approach to service delivery) by 58% compared to an increase in both Plymouth (20%) and Wiltshire (36%).

The evidence presented here suggests that the number of homeless households in Cornwall is not significantly different from elsewhere and has in fact decreased against the trend of increases elsewhere. As such the Council considers that this should not be considered a factor that could lead to an increase in the housing requirement as currently identified.

Market Signal - Caravans or Mobile or Other Temporary Accommodation

BN37 Caravans or Mobile or Other Temporary Accommodation[xxiv] identifies that the proportion of households in temporary or mobile accommodation in Cornwall is twice that of the average for the South West and has been consistently so between 1991 and 2011. The graph below summarises the level of households in temporary or mobile accommodation[xxv] for Cornwall, Devon, Wiltshire, the South West and England. As shown, the proportion of households in caravans, mobile homes or other temporary structures in Cornwall is significantly higher than for any other of the other areas assessed, and it has remained consistently high over the long term.



Between 1991 and 2011, the number of households that were living in caravans, mobile or other temporary accommodation in Cornwall had increased by 27% compared to Devon (9%), Wiltshire (3%), the South West at 13% and 22% across England. Data in terms of the SHMNA authorities indicated that the number of households that were living in caravans, mobile or other temporary accommodation had increased by 8% in Plymouth between 1991 and 2011, by 25% in South Hams and had decreased by 6% in West Devon.

What is clear from this data is that the proportion of households living in temporary accommodation in Cornwall is significantly different to the pattern experienced elsewhere. Further work to understand the nature of this difference indicates that the main component of this category is park home type developments in particular localities. While these types of sites will vary in quality they do provide permanent accommodation. As such the Council considers that the higher proportion of caravans or other mobile or temporary structures should not be considered as a factor that would lead to an adjustment in the housing requirement as currently identified.

Other Factors that Impact on the Local Housing Market

Second and Holiday Homes: A high proportion of an authority's housing stock being used as second homes is not an issue everywhere as these types of properties tend to be located in the more rural and coastal areas. As a result the issue is not considered of national significance.

Second homes[BN11] generally have an impact on house prices as demonstrated by the fact that when levels of second home ownership rise so too do average house prices. This is logical as second home owners are not likely to be attracted to low value housing markets and in higher value areas prices are pushed up by the available budgets of affluent second home owners[xxvi]. For example, in five parishes of Cornwall where second homes account for more than 35% of all housing the average house price is 87% above the Cornwall average. This premium falls to 46% where second home ownership is between 20% and 30% and falls further to 23% where second home ownership is between 10% and 20%. Local buyers, on local incomes and earnings, will therefore be priced out of some but certainly not all of Cornwall's housing markets.

11.2% of houses in Cornwall in 2011 did not have a usual resident which means they are vacant or are used as second or holiday homes - the vast majority of these spaces in Cornwall will be second and holiday homes as Council Tax records indicated that in 2011 there were about 1.3% of properties registered as long term vacant. This compares to 7.8% in Devon, 3.9% in Wiltshire, 6% across the South West and 4.3% across England. In terms of Cornwall's partner SHMNA authorities, the figure is 3.7% in Plymouth, 14.8% in South Hams and 8% in West Devon.

Second homes account for a significant proportion of dwellings in Cornwall and it could be argued that we would need to plan for a number of new dwellings to meet this 'need' in addition to that planned to meet future household growth needs? The Cornwall Local Plan: Strategic Policies Inspector agrees and has indicated that the housing target for Cornwall needs to be adjusted upwards to accommodate a certain proportion of homes in the future being purchased as second and holiday homes.

Second and Holiday Homes - Second homes account for a significant proportion of dwellings in Cornwall and it is reasonable to assume that a proportion of future homes will be used for this purpose. It is therefore sensible that we need to plan for a number of new dwellings to meet this 'ongoing need' in addition to that planned to meet future household growth needs, and it is considered reasonable to adjust the housing requirement upwards by a certain proportion – currently suggested as 7% - to accommodate the fact that a proportion of dwellings in the future will be used for this purpose and will be unavailable to local households.

Economic Strategy: The economic projections and assumptions behind the respective Council and Local Enterprise Partnership strategies are incorporated into the revised demographic projections. The model used provides for a range of possible housing levels based upon different scenarios ranging from a housing requirement for 46,420 to 52,080 additional homes to meet economic strategy needs.

The range of economic projections required is in line with the demographic options adjusted for market signals and second homes and does not require any further adjustment.

Risk Assessment

If a planning authority decides on a figure which is less than their 'objectively assessed need' they will have to address any unmet requirement by approaching other authorities within the housing market area[BN2]. Any decision to fall short of the objectively assessed requirement must be clearly justified, and this will be rigorously scrutinised prior to, and during examination where an authority will be required to defend the approach set out in the plan and particularly how it relates to the evidence base. Cornwall has undertaken its SHMNA with the main neighbouring authorities and plans to meet its own housing need, as do other neighbouring authorities.

Use in Cornwall Local Plan

General housing papers including:

- Housing Topic Paper (February 2011) accompanied the Core Strategy Options Report - http://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/cornwall-local-plan-strategic-policies/core-strategy-options-report/
- Housing Topic Paper (January 2012) accompanied 'Our Preferred Approach for a Core Strategy' - http://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/cornwall-local-plan-strategic-policies/our-preferred-approach-for-a-core-strategy-and-options-and-preferred-options-for-minerals-energy-and-waste/ and the Cornwall Local Plan: Strategic Policies Pre Submission Version - http://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/cornwall-local-plan-strategic-policies/strategic-policies-pre-submission-stage/
- BN13 Housing Mix, Type and Tenure accompanied the Cornwall Local Plan: Strategic Policies Proposed Submission Version and Schedule of Focussed Changes - http://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/cornwall-local-plan-strategic-policies/strategic-policies-proposed-submission-version/

Examination Findings

Market signals are tested as part of the full objectively assessed need for housing and are thoroughly tested at local plan examinations. The objectively assessed need for housing is one of the most contentious topics for discussion at local plan examinations and has been the cause of many examination being suspended for further work (as is the case for Cornwall).

Associated Briefing Notes

BN2 – Housing Market & the Strategic Housing Market Needs Assessment
BN3 – Population & Population Projections
BN4 – Households & Household Projections
BN6 – Why do we Need to Build More Homes?
BN8 – Deliverability & the Strategic Housing Land Availability Assessment
BN10 – Affordable Housing Need

BN11 – Second & Holiday Homes
BN13 – Housing Mix, Type and Tenure
BN14 – House Prices & Affordability
BN15 – Housing Under Supply
BN16 – Private Rented Sector
BN17 – Incomes & Earnings
BN22 – Welfare Reform
BN28 – Concealed Households
BN37 – Temporary or Mobile or Other Temporary Accommodation

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[i] DCLG (2012) National Planning Policy Framework
[ii] DCLG (2014) Housing and Economic Development Needs Assessments
[iii] Cornwall Council (2015) Housing Evidence Base Briefing Note (BN14) House Prices & Affordability
[iv] Land Registry (2015) House Price Index
[v] Cornwall Council (2015) Housing Evidence Base Briefing Note (BN16) Private Rented Sector [vi] Valuation Office (2015) Private Market Rental Statistics
[vii] Cornwall Council (2015) Housing Evidence Base Briefing Note (BN10) Affordable Housing
[viii] DCLG (2015) Table 702 Local Authority Average Weekly Rents by District
[ix] Cornwall Council (2015) Housing Evidence Base Briefing Note (BN14) House Prices & Affordability
[x] DCLG (2015) Table 576 Ratio of Lower Quartile House Prices to Lower Quartile Earnings
[xi] Cornwall Council (2015) Housing Evidence Base Briefing Note (BN8) Deliverability & the Strategic Housing Land Availability Assessment
[xii] Cornwall Council (2011) Annual Monitoring Report 2010-11
[xiii] Cornwall Council (2015) Housing Evidence Base Briefing Note (BN15) Housing Under-Supply
[xiv] DCLG (2015) Table 253 Permanent Dwellings Started and Completed
[xv] Cornwall has used its own completion figures for this analysis as the figures in DCLG table 253 were not always accurate. Please note that other authorities that are used as comparators may also be under-represented and the shown rate less than what it should be.
[xvi] Cornwall Council (2015) Housing Evidence Base Briefing Note (BN15) Housing Under-Supply
[xvii] Planning Advisory Service (2014) Objectively Assessed Need and Housing Targets: technical advice note
[xviii] Cornwall Council (2015) Housing Evidence Base Briefing Note (BN15) Housing Under-Supply
[xix] Census (2015) 2001 (S053) and 2011 (QS408) via NOMIS
[xx] Cornwall Council (2015) Housing Evidence Base Briefing Note (BN28) Concealed Households
[xxi] Census (2015) 2011 (LC1110) via NOMIS
[xxii] Cornwall Council (2015) Housing Evidence Base Briefing Note (BN10) Affordable Housing Need
[xxiii] DCLG (2015) Live Tables on Homelessness – Detailed Local Authority Level Responses
[xxiv] Cornwall Council (2015) Housing Evidence Base Briefing Note (BN37) Caravans or Mobile or Other Temporary Accommodation
[xxv] Census (2015) 1991 (L58), 2001 (S049) and 2011 (KS401)
[xxvi] Savills (2013) Seconds out on Second Homes