Appeal by Richborough Estates Ltd

Land north of Braeburn Way, Cranfield

LOCAL HOUSING NEED (LHN) PROOF OF EVIDENCE OF Jonathan Lee

ON BEHALF OF
CENTRAL BEDFORDSHIRE COUNCIL

PINs Ref: APP/P0240/W/21/3267704

Local Planning Authority reference no. CB/20/03342/OUT

Introduction

- My name is Jonathan Lee and I am Managing Director of Opinion Research Services (ORS), an independent social research practice that was founded at the University of Wales Swansea and has specialised in social and housing research for more than 25 years. I have a BSc degree in Computer Science (with Honours) awarded by the University of Wales (Swansea) in 1996.
- I first joined ORS in 1994 and have been responsible for Strategic Housing Market Assessments undertaken for more than 100 local authorities across England and Wales, all of which require advanced knowledge of statistics and demographic modelling. I have also worked on numerous Housing Needs Assessments, Housing Requirement Studies, Stock Condition Surveys and Health Impact Assessments.
- I am instructed by Central Bedfordshire Council to give evidence in relation to this Appeal. My evidence in this case deals specifically with housing need. I was the Project Director for the "Luton & Central Bedfordshire Strategic Housing Market Assessment Update 2015" (examined as part of the Luton Plan Examination evidence base), the "Initial Strategic Housing Market Assessment for Luton & Central Bedfordshire (May 2017)" that superseded it, and the current study: "Luton & Central Bedfordshire Strategic Housing Market Assessment (December 2017)" (the SHMA, CD6.2).
- I took responsibility for the analysis and modelling on all of these studies and was the lead author of their reports. All of the studies fully comply with the original National Planning Policy Framework (Original NPPF, March 2012) and the approach used is well-established and consistent with the associated Planning Practice Guidance (PPG) on the Assessment of housing and economic development needs (PPG ID 2a).
- The revised National Planning Policy Framework (Revised NPPF, February 2019) and the associated PPG introduced a standard method for assessing Local Housing Need (LHN). Whilst the Council does not intend to update its SHMA at this stage, I have been asked to advise the council on the use of the standard method in Central Bedfordshire in the context of the detailed analysis that I have undertaken for the sequence of housing assessments previously prepared for the area.
- The evidence which I have prepared and provide for this appeal reference APP/P0240/W/21/3267704 (in this proof of evidence) is true and I confirm that the opinions expressed are my true and professional opinions. Planning and site assessment details relating to the Appeal are considered by other witnesses.

Summary of Housing Need Evidence

- This Appeal is being considered under the revised National Planning Policy Framework (Revised NPPF, February 2019). Paragraph 73 of the Revised NPPF states that:
 - Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies 36 , or against their local housing need where the strategic policies are more than five years old 37 .
- In Central Bedfordshire, the strategic policies are more than five years old and therefore the supply of specific deliverable sites should be based on local housing need. Given this context, footnote 37 states:
 - Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.
- 3. Planning Practice Guidance [ID 2a-004-20201216] sets out the standard method based on a four-step approach.
 - » Step 1 sets the baseline using the CLG 2014-based household projections for the area;
 - » Step 2 applies an adjustment to take account of local affordability;
 - » Step 3 caps the level of any increase depending on the current status of relevant policies;
 - » Step 4 applies a 35% uplift for those authorities in the top 20 cities and urban centres list.
- 4. For Central Bedfordshire, the household projections identify an increase from 124,594 households in 2021 to 141,432 households in 2031; growth of 16,838 households over 10 years, an average of 1,684 per year. The most recent median workplace-based affordability ratio is 10.19 for 2020, and the PPG calculation yields an adjustment factor of 1.3869 at step 2. Applying this adjustment factor to the household growth identifies a local housing needs figure of 2,335 dpa. Neither step 3 or step 4 of the standard method currently apply in this area.
- The Council agrees that this is the local housing need figure that national policy provides would normally be used for assessing whether a five-year housing land supply exists; but neither I nor the Council believe that this figure should be relied upon in Central Bedfordshire. In my view, the official population estimates for Central Bedfordshire are wrong and numerous Inspectors have accepted my evidence to this effect. This

means that the official projections do not provide a realistic assessment of demographic growth and as a consequence, the housing need for Central Bedfordshire calculated using the standard method set out in national planning guidance is not realistic either.

- Whilst the changes to the NPPF introduced in February 2019 mean that it does not expressly provide for departures from the standard method set out in national planning guidance when strategic policies are more than five years old, the NPPF is of course only policy (as opposed to statute) and it would be wrong to follow such policy blindly when there is clear evidence that demonstrates inaccuracies in the data. Planning policy necessarily admits that there will sometimes be exceptions; for example where it would be irrational to apply a general policy given the specific local circumstances. This position has been accepted by Inspectors at a number of Central Bedfordshire appeals since the February 2019 revision of the NPPF; and has also been endorsed by the High Court in the context of legal proceedings.
- The CLG 2014-based household projections, in which the standard method is grounded, do not provide a realistic assessment of demographic growth for Central Bedfordshire. This is due to problems with the ONS mid-year population estimates. The SHMA considered these issues in detail and established independent population estimates and household projections based on local evidence. The Council does not rely on an individual source to justify the adjustments to the population estimates, but considers the wide range of factors summarised below which collectively support the downward adjustment made in the SHMA:
 - i) The 2014-based sub-national population projections (on which the CLG starting point is based) indicate that Central Bedfordshire would fall well within the top 10% of all local authorities in England in terms of population growth. While such growth does not necessarily indicate an error, it warrants further investigation;
 - ii) The ONS has recognised that there was a discrepancy with the mid-year estimates (MYE) in Central Bedfordshire between 2001 and 2011 of around 7,200 people. In 2011 it made a downward UPC adjustment for Central Bedfordshire;
 - This adjustment was needed despite the ONS Migration Statistics Improvement Programme (MSIP) having improved the reliability of migration data nationally. The effect of MSIP in Central Bedfordshire was to exacerbate the inaccuracies;
 - iv) It is likely that the overestimate was in the period 2005-11 when MSIP adjustments substantially increased net migration, which then had to be adjusted downwards to reflect reality;
 - v) The post-2011 MYEs show net migration to be exceptionally high in Central Bedfordshire.

 Between 1991 and 2011, net inward migration exceeded 2,000 in only one year. From 2012 the MYEs show it exceeding that figure in every year;

- vi) The untested MYE for the 4-year period 2011-15 suggested growth equal to 85% of the total for the previous 10 years: the figures bear little resemblance to trends calibrated to Census data;
- vii) At the time that the SHMA was prepared, there had been no change in the methodology behind the MYE since the 2011 Census, and the problem that caused the overestimate up to 2011 had not been resolved;
- viii) The ONS themselves recognised the ongoing uncertainty with the MYE for Central Bedfordshire.

 They place the estimates within a very wide range and confirm that most of their uncertainty is a consequence of migration;
- ix) Given that the 2001-2011 MYE were too high, and, given the MSIP-adjusted MYEs were higher still, the SHMA considered other administrative data, including the Patient Register, school census and pensions data. All of the administrative data suggested that the population was not growing as fast as suggested by the MYEs;
- x) House-building rates for the period 2011-15 also indicate that the population is not growing as fast as the MYEs suggest;
- xi) More recently, the ONS has issued revised mid-year estimates for the period 2012-2016 following further improvements to the methodology, and this has reduced the official population estimate for mid-2016 by 2,206 persons;
- xii) There is also an ONS research project ongoing to provide population estimates based on administrative data. For Central Bedfordshire, the method (which is currently known to typically overestimate population) identifies considerably fewer people than the MYE.
- 8. Critically, it is not only one factor that is cause for concern. There are many factors, all of which consistently identify that the MYEs for the period since 2011 are inaccurate. It is evident that it would be wrong to rely on the latest MYE in Central Bedfordshire uncritically.
- The ONS has twice revised the official estimates. Central Bedfordshire had the seventh largest reduction to the 2016 MYE (within the top 2.5% of all England LAs outside London) and the twelfth largest UPC reduction (within the top 5% of LAs). There is no area outside London with larger adjustments on both measures; and although the problems are not unique, the area is exceptional. Furthermore, despite the ONS having made two substantial downward adjustments, the estimates remain higher than those based on the new method using administrative data and hence may continue to over-state population growth.
- ^{10.} Given this context, I have significant concerns about the Government's standard method (which adopts a prescriptive calculation with specified data sources, without any scope for variation) in terms of its

conclusions for Central Bedfordshire. The calculations identify a need for 2,335 dwellings annually from 2021 to 2031; a total of 23,350 additional dwellings over the 10-year period. Given an existing stock of 123,969 dwellings, this represents an increase of 19%. The LHN figure based on the standard method is extreme and it cannot sensibly be relied upon **because of problems with the data**.

- The SHMA has recently been tested at the Central Bedfordshire Local Plan Examination, and the same methodology was tested previously at the Luton Local Plan Examination. At both examinations, the Council argued that the official population estimates for the area cannot be relied upon and as a consequence the official projections do not provide a robust starting point. This was accepted by the Luton Local Plan Inspector, and the Inspectors examining the emerging Central Bedfordshire Local Plan have not raised any concerns about this in their interim views and the Main Modifications do not propose any changes to the OAN or the housing requirement.
- The SHMA has also been tested at several planning appeals. In each case, the Council has consistently argued that the official population estimates for the area cannot be relied upon. The Council's position has consistently been endorsed by numerous Inspectors (including seven appeals heard under the 2019 NPPF) and none of the Inspectors that have considered the Council's evidential package prepared by ORS have found it appropriate to use an alternative housing need figure to that found in the SHMA.
- 13. One of these appeals was subject to a High Court challenge, where the appellant sought to contest the Inspector's decision to accept the Council's position (and so not apply the standard method in assessing housing need), arguing that departure from the standard method was not justified or lawful. The Secretary of State elected to defend his Inspector's decision and resist the legal challenge, specifically endorsing the departure from the standard method in the context of the circumstances in Central Bedfordshire on the basis that it was correct and lawful to do so. Permission to review the Inspector's decision was refused by one High Court Judge on the papers and another High Court Judge after an oral hearing. Neither Judge felt that the criticisms of the Inspector's approach were even arguable.
- The reliability of the local population data has been tested extensively and the Council's arguments have routinely been found to be sound. The official household projections for Central Bedfordshire do not provide a realistic assessment of demographic growth. As a consequence, the standard method set out in national planning guidance provides an inappropriate measure of housing need for this area.
- 15. The SHMA provides the only robust and reliable assessment of housing need for Central Bedfordshire at 1,600 dpa. This is based on a well-established, recognised methodology, and provides the basis for assessment of Local Housing Need using a justified alternative approach to the Government's standard method which ensures consistency with the emerging Local Plan.

1. Background Context

- ORS was commissioned by Central Bedfordshire and Luton Councils to undertake a Strategic Housing Market Assessment ("the SHMA") to support the Councils in objectively assessing and evidencing development needs for housing (both market and affordable) and to provide evidence to inform local policies and plan making over the 20-year period 2015-2035. This work supersedes earlier studies undertaken previously by ORS for the Councils to provide evidence for the 20-year period 2011-2031. However, it is relevant to note that these studies have been based on a consistent methodology.
- The SHMA forms part of the evidence base for the Central Bedfordshire Emerging Local Plan, and fully complies with the original National Planning Policy Framework (NPPF, March 2012). The approach used is also consistent with the associated Planning Practice Guidance on the Assessment of housing and economic development needs (PPG, March 2014 and all subsequent updates which pre-date the revised Framework).
- The SHMA identifies the full, objectively assessed needs (OAN) of the Central Bedfordshire and Luton housing market area (HMA) for the 20-year period 2015-2035: a total of 51,000 dwellings. The SHMA also apportions this need between Central Bedfordshire (32,000 dwellings) and Luton (19,000 dwellings), ensuring that the full needs of the housing market area have been counted. This assessment updates the figures in the previous SHMA, which covered the 20-year period 2011-2031 and identified an overall need of 47,237 dwellings (rounded to 47,300) comprising 29,500 dwellings in Central Bedfordshire and 17,800 dwellings in Luton.
- 1.4 The SHMA provides the only robust and reliable assessment of Housing Need for Central Bedfordshire based on a well-established, recognised methodology. This provides the basis for the Local Housing Need using a justified alternative approach to the Government's standard method, given that this cannot be relied upon in Central Bedfordshire as discussed further in Section 2 and 3 of this proof. It also ensures consistency with the emerging Local Plan.

2. LHN Standard Method

2.1 This appeal is being considered under the revised National Planning Policy Framework (Revised NPPF, February 2019). Paragraph 73 of the Revised NPPF states that:

Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies 36 , or against their local housing need where the strategic policies are more than five years old 37 .

In Central Bedfordshire, the strategic policies are more than five years old and therefore national policy directs that the supply of specific deliverable sites should be based on local housing need. Given this context, footnote 37 states that:

"Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance."

On 6 August 2020, the government published "Changes to the current planning system". The consultation paper set out proposals to change the standard method for assessing local housing need. The Government's response to the consultation was published on 16 December 2020, and this stated that:

"We do not propose to proceed with the specific changes to the standard method that were consulted on ... Having taken the responses into account, we have decided the most appropriate approach is to retain the standard method in its current form. However, in order to meet our principles of delivering more homes on brownfield land we will apply a 35 per cent uplift to the post-cap number generated by the standard method to Greater London and to the local authorities which contain the largest proportion of the other 19 most populated cities and urban centres in England."

^{2.4} On the same date, the Planning Practice Guidance that sets out the standard method was updated to include the uplift for authorities in the top 20 cities and urban centres list as part of the calculation.

¹ https://www.gov.uk/government/consultations/changes-to-the-current-planning-system

https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system

- ^{2.5} Planning Practice Guidance [ID 2a-004-20201216] now sets out the standard method based on a four-step approach.
 - » Step 1 sets the baseline using the CLG 2014-based household projections for the area;
 - » Step 2 applies an adjustment to take account of local affordability;
 - » Step 3 caps the level of any increase depending on the current status of relevant policies;
 - » Step 4 applies a 35% uplift for those authorities in the top 20 cities and urban centres list.
- For Central Bedfordshire, the household projections identify an increase from 124,594 households in 2021 to 141,432 households in 2031; an overall growth of 16,838 households over the 10-year period, equivalent to an average of 1,684 households per year. This provides the baseline at step 1 of the calculation.
- ^{2.7} The most recent median workplace-based affordability ratio is 10.19 for 2020, and based on the PPG calculation set this yields an adjustment factor of 1.3869 at step 2. Applying this adjustment factor to the household growth yields a local housing needs figure of 2,335 dwellings per annum.
- ^{2.8} Based on the current status of relevant policies, step 3 of the calculation would cap the level of any increase to 40% (equivalent to an adjustment factor of 1.40 at step 2). As the adjustment factor is currently lower than the cap, there is no cap currently applied at step 3.
- The newly introduced step 4 does not apply in Central Bedfordshire, as the local authority is not one of those which contains the largest proportion of population for any of the 20 cities or urban centres in England within the ONS list of major towns and cities. As a consequence, none of the changes to this paragraph of the PPG that were published on 16 December 2020 had any impact on the way in which local housing need was calculated using the standard method in Central Bedfordshire. In this area, the standard method calculation published on 16 December 2020 is identical to the previous version of the calculation published on 20 February 2019.
- ^{2.10} The Council agrees that this is the local housing need figure that national policy provides would normally be used for assessing whether a five-year housing land supply exists; but neither I nor the Council believe that this figure should be relied upon in the case of Central Bedfordshire.
- ^{2.11} In my view, the official household projections for Central Bedfordshire are wrong and numerous Inspectors have accepted this position.

Views from Local Plan Inspectors

- The SHMA has recently been tested at the Central Bedfordshire Local Plan Examination. At the hearings, the Inspectors requested that ORS produce a detailed comparison of the various revisions to the population and household projections that were discussed at the Examination as part of Matter 2 (Housing Need). This document (EXAM 33 ORS Housing & Employment Note; CD6.8) demonstrates that the SHMA projection (based on the SHMA population estimates and migration trends for the period 2005-15) was broadly consistent with the ONS 2016 10-year migration variant population projection (based on the revised MYEs and migration trends for the period 2006-16) and the associated household projection.
- 2.13 Having considered the detailed evidence submitted by all parties, the Local Plan Inspectors' letter to the Council states (EXAM 69 para 87; CD6.7):

The OAN for housing in the Luton & Central Bedfordshire Strategic Housing Market Assessment (December 2017) ('SHMA') is based on a downward adjustment due to concerns regarding the accuracy of midyear estimates and the resulting household projections. In the event that new national household projections had been published, any reconvened hearing sessions would have to consider whether the change was meaningful, as required by the PPG. There would also need to be a further assessment to see if the downward adjustments in the SHMA remained relevant.

- There is clearly no criticism of the downward adjustment, although the Inspectors rightly note that there would "need to be a further assessment to see if the downward adjustments in the SHMA remained relevant" (emphasis added) in the event that new national household projections are available when hearing sessions reconvene. On this basis, it is reasonable to conclude that the Inspectors accepted that the downward adjustments in the SHMA was relevant at their time of writing.
- ^{2.15} Following the publication of the ONS 2018-based household projections in June 2021, the Inspectors wrote to the Council to ask whether the latest projections represented a meaningful change to the housing situation. In their response (EXAM 119; CD6.6) the Council confirmed that the change to the OAN was less than 1% and that this did not represent a meaningful change. The new projections were discussed at a hearing in December 2020, and the Inspectors did not request any further work.
- Whilst the Inspectors have yet to issue their final report, the proposed Main Modifications were consulted on from 19 March until 5 May 2021 and no changes are proposed to the OAN or the housing requirement. On this basis, it is apparent that the Central Bedfordshire Local Plan Inspectors will endorse the SHMA figures in due course.

- The previous SHMA (based on the same methodology, and which raised the same concerns about the official population estimates) was tested at the Luton Local Plan examination. The Inspector's report considers the housing number at length (CD12.1, paras 76-109). His report endorses the OAN figure of 47,237 dwellings as being reasonable (para 92) and confirms that the SHMA apportionment of 17,800 for Luton borough (and therefore the balance of 29,500 for Central Bedfordshire) is also reasonable (para 96).
- 2.18 Whilst the Luton Local Plan Inspector rightly notes that evidence from the new SHMA will need to be considered once available, he did not consider it necessary for the Plan to refer to "at least" 17,800 dwellings (para 109), although he did recommend an early review to take account of the latest information (para 107).
- ^{2.19} The current SHMA is based on the same methodology as the approach endorsed by the Luton Local Plan Inspector, and the Central Bedfordshire Plan Inspectors.

Appeal Decisions

- The SHMA has also been considered by Inspectors at numerous appeals. Whilst all of these decisions pre-date the revisions to PPG published on 16 December 2020, the six most recent planning appeals were considered under the version of the PPG published on 20 February 2019. As all of these decisions are recent and specifically address the issue of 5-year housing land supply in Central Bedfordshire (with the Council's written evidence essentially being the same as at this appeal) and I believe they should be given very significant weight at this Inquiry. In this context, it is important to recognise that the newly introduced fourth step of the calculation does not apply in Central Bedfordshire. As such, the December 2020 standard method calculation is exactly the same as the February 2019 calculation in this area, and the approach/reasoning of those Inspectors remains directly applicable.
- ^{2.21} The most recent decision was the redetermination of the Langford Road, Henlow inquiry (April 2020, CD9.26). The appeal was dismissed, and the Inspector's discussion of the issues relating to Housing Need is set out at paragraphs 82 to 109, which lead to the following conclusion (emphasis added):
 - 102. In conclusion, there are clear reasons for not applying the standard method in Central Bedfordshire (the legal test). There is the evidence to show that the circumstances are exceptional when compared to many other local authority areas (the policy test).
 - 103. The Council relies on its SHMA as the only robust and reliable assessment of housing need for Central Bedfordshire. It uses the CLG 2014-based household projections as the starting point with adjustments to reflect local demography. As an alternative to the standard method, **this approach**

has several advantages within Central Bedfordshire. The SHMA is informing the emerging Local Plan and so brings consistency of approach within the local authority area. It is in accordance with the transitional provisions made through national policy and is based on a recognised approach. The Inspectors examining the plan raised a number of questions related to the SHMA in the hearings last year. Most recently, whilst reserving their position, they have indicated that reconvened hearing sessions will be used to discuss the new evidence related to the review of the Sustainability Appraisal. At the present time there is little indication that the housing requirement will be substantially revisited. The SHMA was endorsed by the Inspector in the Luton Local Plan, a neighbouring local authority area. There is consistency in approach.

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107. With all the considerations above in mind, at the present time and for the purposes of this appeal the Council's assessment of local housing need based on the SHMA provides the appropriate figure to use in considering whether a 5YHLS can be demonstrated.

- ^{2.22} The above decision follows on from decisions for the Sunderland Road inquiry (March 2020, CD9.33) and Langford Road, Langford inquiry (February 2020, CD9.25).
- ^{2,23} The Sunderland Road decision letter (CD9.33) discusses the issues relating to Housing Need at some length over six pages, at paragraphs 79 to 106 (pages 13 to 18). This discussion leads to the following conclusion (emphasis added):

Housing Need Conclusion

104. If the Council's position on OAN, as set out in appendix 3 of ID19, is assumed then this gives a deliverable supply of around 5.72 years. If the appellants' position, as set out in the same appendix, is assumed then this gives a deliverable supply of around 5.36 years. The latter differs in that over supply was not banked and completions north of Houghton Regis were excluded from the calculation.

105. Although a deliverable supply of 3.64 years is only present when the SM is applied, <u>I find clear</u> and convincing justification for the application of a tried and tested method, as defined in the <u>SHMA, for the reasons I have already given</u>. I do not consider a hybrid approach that includes a different affordability adjustment to be tenable under the circumstances. <u>Consequently, the weight</u> attributable to the SM in deriving the LHN is greatly reduced.

- 106. Accordingly, in line with paragraph 11(d) of the Framework the 'tilted balance' is not engaged.

 Consequently, my assessment of the proposal in the planning balance will proceed against the policies of the extant development plan.
- ^{2.24} The Langford Road, Langford decision letter (CD9.25) sets out the issues relating to Housing Need at paragraphs 19 to 35, leading to the following conclusion (emphasis added):
 - 35. Whilst acknowledging the importance of the Government's priority to deliver more housing I conclude on this issue that the Council's use of the SHMA to identify the level of housing demand is appropriate. One Council adopting a different method from the norm which is based on sound evidence to that advocated in national guidance would not in itself undermine or threaten the delivery of the Government's stated objective of achieving 300,000 completions per annum. The Framework allows the setting aside of the standard method in exceptional circumstances. I consider that the Council has in this instance demonstrated 'exceptional' circumstances why this should be so in this case. For these reasons, based on the evidence before me, I consider that the Councils housing target of 1,600 dwellings per annum (dpa) provides an appropriate figure for the housing requirement across the District for the purposes of this appeal.
- All three of these decisions were based on inquiries with evidence presented by expert 'housing needs' witnesses and where that evidence was tested under cross-examination. A further three decisions have been published that support the Council's approach following appeal hearings considered under the February 2019 NPPF and associated PPG: the Park Farm decision (October 2019, CD9.48), the Clophill Road, Maulden decision (July 2019, CD9.47) and the New Road, Clifton decision (June 2019, CD9.46).
- The Park Farm decision letter (CD9.48) sets out a discussion of the Housing Need context at paragraphs 8 to 16 with discussion of the issues relating to Housing Need at paragraphs 67 to 79, which conclude (emphasis added):
 - 74. For Central Bedfordshire it appears that the five year housing need, derived by using the SM and the addition of a 5% buffer, yields an inappropriate figure. So, while the Framework and the PPG are important material considerations, I consider the inaccuracy of the MYEs, and associated implications for the 2014 household projections for Central Bedfordshire, is also an important material consideration. Accordingly, for the purposes of the determination of this appeal, I consider that the weight to be attached to the use of the SM should be greatly reduced. In that regard I am mindful of the Court of Appeal's judgement concerning the Secretary of State for Communities and Local Government and West Berkshire District Council and Reading Borough Council [2016] EWCA

Civ 441 (the West Berkshire judgement). That judgement having been referred to by both the appellant and the Council in their written evidence.

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- 79. So, having found that the use of the SM yields an inappropriate figure, that leaves the FOAHN figure of 1,600 dpa that the Council has identified through the preparation of its SHMA. While that housing requirement figure has been calculated using a methodology no longer favoured by the Government, it is based on the application of a previously recognised methodology. Given the evidence put to me, I therefore consider that a requirement of 1,600 dpa represents the most appropriate need figure to be used in connection with the determination of this appeal. That finding is consistent with the approach taken by a number of Inspectors in determining other recent appeals drawn to my attention by the Council.
- ^{2.27} The Clophill Road, Maulden decision (CD9.47) sets out the issues relating to Housing Need at paragraphs 20 to 27, leading to the following conclusion (emphasis added):
 - 27. Noting the extensive information, including other appeal decisions, I conclude that, the Council's approach is reasonable and has been sufficiently justified. I therefore find that the Council can currently demonstrate in excess of a five year housing land supply. I acknowledge that this matter will be subject to closer scrutiny as part of the Local Plan examination process. Whilst I note that the proposed development would provide up to 42 houses towards the housing land supply, in any event, had I concluded that the Council could not demonstrate a five-year HLS, and the tilted balance was therefore triggered, I find that the landscape harm arising from the development would not be significantly and demonstrably outweighed by the provision of housing in this instance.
- The New Road, Clifton decision was the first to consider the issue of Housing Need in Central Bedfordshire under the 2019 NPPF. That appeal was determined following a hearing which took place in May 2019, some three months after the most recent revisions to the NPPF. The decision letter (CD9.46) sets out a discussion of the issues at paragraphs 51 to 62, which lead to the following conclusion (emphasis added):
 - 57. Prior to the most recent revisions to the Framework and the PPG being published, the Government undertook a technical consultation and the Council made representations to the Government. However, given the very specific concerns that the Council has about the use of the MYEs in its area and the consequences of their use when the SM is applied, I consider it unsurprising that the Government did not introduce caveats into the Framework and the PPG to address statistical errors affecting a very small number of Councils. I consider therefore the absence of any

caveats in the national policy and guidance to address the Council's very particular concerns about the reliability of the MYEs and the household projections founded on them, does not diminish the concern that the Council has put to me. In this regard the SM's application in the Council's area generates a LHN figure that instinctively does not feel right. That is because to achieve the LHN derived through the SM's application the housing stock in Central Bedfordshire would need to grow by the order of 20% between 2019 and 2029.

- 58. Given that the use of the SM yields a LHN figure that seems doubtful, I consider this is an instance when reliance on the SM favoured in the national policy and guidance would be misplaced. So while the Framework and the PPG are important material considerations, I consider the inaccuracy of the MYEs, and associated implications for the 2014 household projections for Central Bedfordshire, is also an important material consideration. Accordingly, for the purposes of the determination of these appeals, I consider that the weight attributable to the SM to derive a LHN should be greatly reduced.
- 59. The appellant has put to me that should I reach a finding that the 'text book' three step SM set out in the PPG should not be applied for the purposes of establishing the LHN in this instance, then a mix and match (hybrid) approach could adopted. The hybrid application of the SM could entail at step 1 the use of the 2016 household projections in substitution for the 2014 household projections or applying the SHMA figure of 1,600 to SM's second and third steps. However, calculating the LHN on a hybrid basis would not follow a tried and test methodology and would introduce the kind of uncertainty in calculating the 5yrHLS that the Government has sought to avoid through the SM's introduction. I am therefore disinclined to accept that a hybrid approach to SM's application would be appropriate.

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61. That leaves the LHN figure of 1,600 dwellings per annum that the Council has identified through the preparation of its SHMA. While that housing requirement figure has been calculated using a methodology no longer favoured by the Government, it is based on the application of a previously tried and tested methodology. Given the evidence put to me, I therefore consider that a requirement of 1,600 dwellings per year represents a reasonable level of LHN to be used in connection with the determination of the appeals before me. My finding in this regard, as was put to me on the Council's behalf at the hearing, is consistent with the approach taken by a number of Inspectors who have determined other recent appeals in the Council's area. I feel I should stress that my use of a LHN figure of 1,600 dwellings per year should not be taken as having any bearing on the

consideration of the housing requirement for Central Bedfordshire that is being undertaken as part of the eLP's examination.

- 62. Although there is a dispute between the parties about the appropriate LHN, for the purposes of these appeals the appellant has not sought to challenge the Council's identification of a housing supply of 9,187 dwellings. There is therefore agreement that the Council can demonstrate a 5yrHLS if that is calculated against the SHMA LHN figure of 1,600 dwellings per annum. Given that I consider for the purposes of the determination of these appeals that <u>it is appropriate to treat</u>

 1,600 dwellings per annum as representing the appropriate LHN figure, it follows that I consider it has been demonstrated that there is a 5yrHLS. The current 5yrHLS position therefore does not warrant the tilted balance being applied for the purposes of paragraph 11 of the Framework.
- The New Road, Clifton decision was subject to challenge through the courts. The Secretary of State elected to support the decision of the Inspector to depart from the standard method (CD10.15), and permission to challenge the decision was refused by one High Court Judge on the papers (CD10.16) and another High Court Judge after an oral hearing (CD10.17). Neither Judge felt that the criticisms of the Inspector's approach were even arguable (see the discussion at paragraphs 2.40 et seq of my proof). The Council believes that the Inspector reached the correct decision and set out his reasoning very clearly at paragraphs 51-62.
- Whilst the February 2019 revisions to the NPPF established the current national policy context and the associated PPG established the current standard method (for those areas where the newly introduced fourth step of the calculation does not apply), the robustness of the SHMA evidence and the problems with the CLG 2014-based household projections had been tested extensively at numerous previous appeals. These include the decision letter for an appeal at Biggleswade Road, Potton (January 2018, CD9.41) which set out a discussion of Housing Need at paragraphs 13 to 26 and paragraph 32, concluding (emphasis added):
 - 17. In this respect, I am persuaded that the evidence of the local planning authority should be used in preference to that of the appellant. The reasons for this include the fact that the Council's evidence builds upon the SHMA Update 2015. Whilst the outturns are different; for example increasing 'need' across the SHMA, the overall methodology was not dissimilar. What is more, the Examining Inspector (considering the Luton Local Plan) found that 'the approach taken in the SHMA to arrive at these figures appear as reasonable'. Whilst it is incumbent upon me to use the most up to date figures for this appeal, the application of similar methodologies to the SHMA from 2015 to

2017 to formulate the OAN, lends support to the Council's OAN figure over that of the appellant in this case.

- The Readshill Quarry, Clophill inquiry decision (November 2017, CD9.40) sets out an extensive and detailed analysis of each aspect of the SHMA at paragraphs 29 to 58. Note that this was based on the May 2017 SHMA, which was identical to the equivalent analysis in the December 2017 SHMA (CD6.2). The appeal was dismissed, and the Inspector confirmed that the SHMA represented a robust basis for establishing the 5-year housing requirement (emphasis added):
 - 51. Conclusion on OAHN: In the absence of an up to date housing requirement figure for Central Bedfordshire in an adopted local plan, I have carefully considered the evidence in the Council's latest SHMA and tested it against the alternative OAHN report submitted by the appellant. I am satisfied that the SHMA is a thorough and robust assessment of the housing needs of the HMA. Although its baseline household projection is lower that the DCLG 2014-based projection, the downward adjustment in respect of migration estimates due to data quality issues has been fully justified. Likewise, the uplift in the dwelling requirement for market signals is reasonable in the light of the evidence available.
 - 52. Applying an overall sense check to the figures recommended by both. The SHMA estimate of 32,000 dwellings or 1,600 dpa represents a 27% increase in dwellings over 20 years. This would be higher than for most surrounding areas, except for the growth areas of Milton Keynes and Cambridge, and consistent with growth levels in London. On the other hand the appellant's OAHN figure of 48,540 dwellings or 2,427 dpa represents an average annual growth of 2.1%, which would be the highest proportional housing target of any Local Plan found sound since the publication of the Framework. This compares with the estimated housing requirement of 2,553 dpa for the period 2016-2026 resulting from the DCLG consultation on a standard methodology for calculating local housing need. However, it is agreed between the parties that little weight can be attached to the standard methodology or the figures in the accompanying data table at this appeal, given that they remain subject to consultation and further consideration by the DCLG in the light of any responses.
 - 53. Therefore, on the basis of the evidence before me and without prejudice to the outcome of future more detailed testing via the local plan examination, conclude that the figure of 1,600 dpa or 32,000 dwellings in the period 2015-2035 represents a robust estimate of OAHN in Central Bedfordshire for the purposes of this appeal. Accordingly, it provides a reasonable basis for assessing whether or not the Council can demonstrate a 5-year supply of deliverable housing sites.

Summary of Appeal Decisions

2.32 Since the publication of the original iteration of the SHMA, ORS have defended the SHMA at a host of appeals in Central Bedfordshire (both inquiries and hearings), as well as the Luton and Central Bedfordshire Local Plan Examinations. There have been 13 Decision Letters where Inspectors have endorsed the Council's housing need position to date. This includes seven appeals considered under the 2019 NPPF, where the Council argued that the SHMA OAN should be used instead of the standard method. There have been five appeals where the Inspector did not reach a finding on the matter at issue; and a further five where the appellant withdrew their objection to the housing need figure after reviewing the Council's evidence such that the Inspector did not need to provide any view. None of the Inspectors at any of these appeals has found it appropriate to use an alternative housing need figure to that found in the SHMA.

Summary of appeals in Central Bedfordshire where the Council has asked ORS to present evidence

Decision Date	PINS code	Site name	Туре	Outcome
06/04/2020	APP/P0240/W/16/3164961	Land Between 103 and 27 Langford Road, Henlow	Inquiry	Endorsed
16/03/2020	APP/P0240/W/19/3228837	Land at 96 Greenfield Road, Flitton, Bedford	Hearing	Withdrawn
16/03/2020	APP/P0240/W/18/3219213	Land to the North of Sunderland Road, Sandy	Inquiry	Endorsed
24/02/2020	APP/P0240/W/19/3236423	Land West of Langford Road, Langford, Bedfordshire	Inquiry	Endorsed
13/12/2019	APP/P0240/W/18/3211229	Land off Broad Street, Clifton	Hearing	No finding
30/10/2019	APP/P0240/W/19/3223970	Land at Clophill Road, Maulden	Written	Endorsed
21/10/2019	APP/P0240/W/18/3204513	Park Farm, Westoning	Hearing	Endorsed
15/10/2019	APP/P0240/W/18/3213352	Sandy Road, Potton	Hearing	No finding
20/09/2019	APP/P0240/W/18/3216675	Back Street, Clophill	Hearing	Withdrawn
10/07/2019	APP/P0240/W/18/3218992	Land at Clophill Road, Maulden	Hearing	Endorsed
25/06/2019	APP/P0240/W/18/3206495 APP/P0240/W/18/3220640	Land West of New Road Clifton	Hearing	Endorsed
21/06/2019	APP/P0240/W/18/3217688	Hillfoot Road, Shillington	Inquiry	No finding
17/10/2018	APP/P0240/W/17/3190687	Land off Sutton Road, Potton	Inquiry	Endorsed
14/05/2018	APP/P0240/W/17/3176387	Land west of Astwick Road, Stotfold	Inquiry	Withdrawn
12/04/2018	APP/P0240/W/17/3170248 APP/P0240/W/17/3172134	Land east of High Street, Silsoe	Inquiry	Withdrawn
20/03/2018	APP/P0240/W/17/3181269	Mill Road, Cranfield	Inquiry	Endorsed
12/03/2018	APP/P0240/W/17/3175605	100 High Street, Meppershall	Inquiry	Withdrawn
03/01/2018	APP/P0240/W/17/3176444	Biggleswade Road, Potton	Inquiry	Endorsed
20/11/2017	APP/P0240/W/16/3152707	Former Readshill Quarry, Back Street, Clophill	Inquiry	Endorsed
21/08/2017	APP/P0240/W/16/3166033	Land between Taylor's Road and Astwick Road, Stotfold	Hearing	Endorsed
19/02/2016	APP/P0240/W/15/3003634	16 Langford Road, Henlow, Bedfordshire	Inquiry	Endorsed
29/06/2015	APP/P0240/A/14/2228154	Land to the East of Station Road, Langford, Bedfordshire	Inquiry	No finding
20/11/2014	APP/P0240/A/14/2215889	Land to the rear of 102 to 126 High Street, Henlow	Inquiry	No finding

- Indeed, since the publication of the SHMA, only two decisions have utilised an alternative to the SHMA: Limbersey Lane and Cobbitts Road (APP/P0240/W/18/3211551 and APP/P0240/W/19/3219983). However, both of these appeals were determined based on written representations, and the Council's position on housing need relied exclusively on the January 2019 edition of their Five Year Land Supply Statement (which predated the February 2019 revision of the NPPF). In neither case did the Council submit an evidential package from ORS such as at this Appeal demonstrating why it was inappropriate to assess Five Year Land Supply with reference to Local Housing Need calculated by the standard method. The totality of the Council's housing need evidence submitted to the Limbersey Lane appeal is provided in Appendix 1 to my proof; the Cobbits Road evidence was essentially identical.
- Furthermore, whilst the Inspectors rejected the Council's arguments concerning its ability to demonstrate a 5-year housing land supply, both appeals were dismissed. This means that there was no opportunity for the Council to challenge either decision on this point. Given this context, no material weight should be afforded to either of these decisions.
- In conclusion, the latest SHMA evidence has been endorsed by Inspectors at numerous section 78 appeals, and the Main Modifications that have been agreed with the Inspectors examining the emerging Local Plan do not propose any changes to the OAN or the housing requirement. Previous iterations of the SHMA have also been tested in the context of both section 78 appeals (both prior to and subsequent to the introduction of the new NPPF) and Local Plan Examination. In each case, the conclusions of the SHMA have been accepted by the Inspector. Furthermore, the SHMA has been accepted as an appropriate basis for establishing Local Housing Need (LHN) given the specific problems associated with the standard methodology in Central Bedfordshire.
- ^{2.36} The Council has consistently argued that the official population estimates for the area cannot be relied upon and as a consequence the official projections do not provide a robust starting point. The reliability of the local population data has been tested extensively and the Council's arguments have routinely been found to be sound. The official household projections for Central Bedfordshire do not provide a realistic assessment of demographic growth. As a consequence, the housing need for Central Bedfordshire calculated using the standard method set out in national planning guidance is not realistic either.

Exceptions to National Policy

- ^{2.37} Whilst the changes to the NPPF introduced in February 2019 do not expressly allow for any departures from the standard method set out in national planning guidance when strategic policies are more than five years old, the NPPF is of course only policy (as compared to statute) and it would be wrong to follow such policy blindly when there is clear evidence that demonstrates inaccuracies in the underlying data.
- ^{2.38} Planning policy necessarily admits that there will sometimes be exceptions; where it would be irrational to apply a general policy given the specific local circumstances.
- In my view, the official CLG 2014-based household projections for Central Bedfordshire are wrong. As a consequence of these errors, these projections do not provide a realistic assessment of demographic growth. Given that the data underlying the standard method is demonstrably incorrect, the housing need for Central Bedfordshire calculated using the standard method set out in national planning guidance is not realistic either so the methodology is not fit for purpose in this particular case. Given this context, the conclusions on 5-year housing land supply that are based on the standard method cannot be relied upon in this area.
- The need to depart from national planning policy was considered in various of the appeal decisions referred to above. It is my view that such an approach is also applicable in the present case. As already noted, the appellant in the New Road Clifton appeal sought to contest the Inspector's decision in the High Court arguing that the departure from the standard method was not justified.
- ^{2.41} The Secretary of State elected to defend his Inspector's decision and resist the legal challenge, specifically endorsing the departure from the standard method in the context of the circumstances in Central Bedfordshire on the basis that it was correct and lawful to do so. This can be seen from the Secretary of State's Summary Grounds of Defence (CD10.15, emphasis added):
 - 25. The Inspector took into account the housing need figure derived from the standard method, but gave it greatly reduced weight because he accepted the Council's evidence that it was derived from data which included an inaccurate input when applied in the Central Bedfordshire area [DL58]. He did not use it to test whether the Council could demonstrate a five year supply of deliverable housing sites [DL58], but instead used the housing need figure from the SHMA [DL61-62].
 - 26. The Inspector did this because he accepted the Council's case that the standard method, when applied in the Central Bedfordshire area, led to an inappropriate housing need figure due to its use of one particular input, namely the census mid-year estimates for that area [DL54-55, DL57-58].

The Inspector concluded that the housing need figure of 1,600 dpa from the SHMA should be used instead, as the figure derived from that tried and tested methodology provided a more appropriate and reasonable housing need figure against which to test whether the Council could demonstrate a five year supply of deliverable housing sites [DL61-62].

- 27. <u>The Inspector was entitled to depart from national policy in the NPPF and the PPG in relation</u>

 <u>to the method by which housing need was to be calculated</u>. National planning policy is a material consideration which must be taken into account (2019 NPPF para 2). It is not a rule of law.
- 28. The application of an unqualified policy must allow for the possibility of exceptions. A decision-maker has to bring his mind to bear on every case and cannot blindly follow a policy without considering anything said to persuade him that the case in hand is an exception. Planning policy is not a rule but a guide. The legal position was summarised in EC Gransden vs SSE (1987) 54 P&CR 86 as follows:

"the fact that a body has to have regard to the policy does not mean that it needs necessarily to follow the policy. However, if it is going to depart from the policy, it must give clear reasons for not doing so in order that the recipient of its decision will know why the decision is being made as an exception to the policy and the grounds upon which the decision is taken"

In this case, the reasons given by the Inspector in DL 51-64 provide "clear reasons" for making an exception to the policy in this case and applying a different method to calculate the housing need. Those reasons were, in essence, because the standard method, when applied in the Central Bedfordshire area, led to an inappropriate housing need figure due to its use of a particular input (the census mid-year estimates for the area), whereas the figure from the SHMA provided a more appropriate and reasonable housing need figure for the area at this time. These reasons are sufficient to meet the standard required by Grandsden.

- At the High Court, Mr Justice Cranston refused permission to bring the case based on the papers (CD10.16), and when the arguments were renewed at an oral hearing, Mrs Justice Lang again refused permission to bring the case (CD10.17). The High Court has not only rejected the criticism but has determined that such criticism isn't even arguable, with clear support for the Inspector's decision given at paragraph 2 of the notification of the first Judge's Decision (CD10.16):
 - 2. On my reading of the DL the Inspector indicated that in line with the Council's submissions and for sound and clear-cut reasons he was departing from national policy on assessing housing need. It is not arguable that he misinterpreted or misapplied national policy. Nor is it arguable that (i) he was not entitled to depart from national policy a basic principle of public law is that pubic bodies

must not fetter their discretion (indeed the claimant accepts that in certain circumstances national policy may be departed from provided cogent reasons are given); and that (ii) instead of the standard method he could not use the figure from the Strategic Housing Market Assessment given his assessment that there were shortcomings in the former (ground 2).

^{2.43} On the basis of the Secretary of State's submission to the High Court, and the conclusions of two High Court Judges, the Council considers that its approach to the issue of departure from the standard method is robust.

3. Concerns About the Data

- I have specific concerns about the standard method conclusions for Central Bedfordshire. As set out in section 2, Inspectors at numerous appeals have agreed with the Council's arguments that the official projections (the CLG 2014-based household projections), which underpin the standard method, do not provide a realistic assessment of demographic growth for Central Bedfordshire. This is due to problems with the ONS 2014-based sub-national population projections (SNPP) caused by errors in the ONS mid-year population estimates. The SHMA considered these issues in detail and established independent population estimates and household projections which took account of all of the local evidence and provide a realistic assessment of demographic growth.
- The Council does not rely on an individual source to justify the adjustments that the SHMA makes to the population estimates for Central Bedfordshire. Instead, it considers the wide range of factors summarised below which collectively support the downward adjustment made in the SHMA:
 - i) The 2014-based sub-national population projections (on which the CLG starting point is based) indicate that Central Bedfordshire would fall well within the top 10% of all local authorities in England in terms of its population growth, with a rate of growth that is more than double the average. While that level of growth does not necessarily indicate an error in the projections, at the very least it warrants further investigation (See chart following para 4.36);
 - The ONS has recognised that there was a problem with the mid-year estimates (MYE) between 2001 and 2011, which show a discrepancy of around 7,200 people. In 2011 it made a downward UPC adjustment for Central Bedfordshire. The SHMA concluded that it was most likely that this related to overstatement of net migration during this period (SHMA paras 3.23-3.27);
 - This adjustment was needed despite the ONS Migration Statistics Improvement Programme (MSIP) having improved the reliability of migration data nationally. The effect of MSIP in Central Bedfordshire has in fact been to exacerbate the inaccuracies. This is plain to see from the divergence of the MSIP-informed migration estimates post-2005 from the previous MYE (SHMA figure 37);

- iv) It is highly unlikely that the error in migration data relates solely to the earlier part of the decade. It is far more likely that the overestimate is attributable to the period from 2005-11 when the MSIP adjustments substantially increased estimated net migration, which then had to be adjusted downwards to reflect reality after the 2011 Census (See figure following para 4.5);
- v) The post-2011 MYEs show net migration to be exceptionally high in Central Bedfordshire.

 Between 1991 and 2011, net inward migration exceeded 2,000 in only one year. From 2012 the MYEs show it exceeding that figure in every year (SHMA figure 38);
- vi) In the 10 years between 2001 and 2011 there was an increase of 21,600 people, or on average, 2,160 per year. According to the MYE, there was growth of 18,400 people between 2011 and 2015, which equates to 4,590 per year. Taken at face value, the MYE suggest that growth in those four years was equal to 85% of the total growth for the previous 10 years. The untested MYE for Central Bedfordshire since 2011 bear very little resemblance to the actual population trends it has seen up to 2011, which benefit from calibration against reliable Census data;
- vii) At the time that the SHMA was prepared, there had been no change in the methodology behind the MYE since the 2011 Census. Any systematic error causing the overstatement in population estimates prior to 2011 would persist in projections of future population. In short, the problem that caused the overestimate up to 2011 has not been resolved;
- The ONS themselves recognise the ongoing uncertainty with the MYE for Central Bedfordshire. They place the latest estimates within a very wide range and confirm that most of their uncertainty is a consequence of the migration data. The 2015 MYE suggest 274,022 but ONS' uncertainty measure indicates that the Central Bedfordshire population range is likely to lie between 268,167 and 279,877. The majority (51%) of the uncertainty over the population relates to international migration data which means that there is uncertainty as to the international migration data to the tune of 5,972 people. ONS uncertainty in its estimates appears to be increasing year-on-year. In 2016 the uncertainty relating to net international migration in Central Bedfordshire amounts to 8,647 people³;
- In light of the fact that the MYE for 2001-2011 are known to have been too high, and, given the MSIP-adjusted MYEs were higher still, consideration was given to other administrative data, including the Patient Register, school census and pensions data. Each piece of administrative

³ Research-based statistical measure of uncertainty for local authority mid-year population estimates from 2012 to 2016 for England and Wales – ONS 2017

data suggests that the population is not growing as fast as suggested by the MYEs. While the Patient Register is not a measure of population (it is normally higher than the actual population), one would expect it to normally grow in proportion with the population. The Patient Register indicates a 2011-2015 population growth of 16,010 which is close to the growth of 15,885 in the SHMA (SHMA figure 43);

- Allowing as fast as the MYEs suggest. In that 4-year period, 5,062 dwellings were delivered. Allowing for a vacancy rate of 4% and an average household size of 2.41 persons per dwelling, this suggests that some 11,711 (5,062 x 96% x 2.41) have been accommodated in those new homes, rather than the 18,350 shown in the MYEs. In light of the administrative data showing slower growth rates than anticipated by the MYE, the housing delivery rates further indicate that the MYEs for the period since 2011 are too high;
- xi) More recently, the ONS has issued revised mid-year estimates for the period 2012-2016 following further improvements to the methodology (the most significant change relating to international out migration), and this has reduced the official population estimate for mid-2016 by 2,206 persons. Further improvements are planned in relation to the treatment of students in domestic migration estimates;
- There is also an ONS research project ongoing to provide population estimates based on administrative data without depending on Census data being rolled-forward from year-to-year. Whilst the Admin-Based Population Estimate (ABPE) does not yet provide official population estimates, it is likely that this will become the preferred measure for population estimates once it is fully developed. Currently, the methodology tends to over-estimate population in certain age groups, in particular males of working age. For Central Bedfordshire, the ABPE (v2) identified a population of 271,974 persons in mid-2015, a figure that is broadly consistent with the base population of 271,529 persons assumed by the SHMA. This compares to the original MYE of 274,022 persons and the revised MYE of 272,421 persons for the same year. In other words, the ABPE (which is currently known to typically overestimate population) identifies considerably fewer people than the official estimates⁵

⁴ <u>http://www.centralbedfordshire.gov.uk/Images/annual-monitoring-report-2014-2015 tcm3-12364.pdf</u>

⁵ https://www.ons.gov.uk/census/censustransformationprogramme/administrativedatacensusproject/administrativedatacensusresearchoutputs/ sizeofthepopulation/researchoutputsestimatingthesizeofthepopulationinenglandandwales2016release

- ³³ Critically, it is not only one factor that is cause for concern in Central Bedfordshire. There are many factors, all of which consistently identify that the MYEs for the period since 2011 are inaccurate. Taken in the context of the ONS already having corrected the MYEs from 2001-2011 with a substantial downward adjustment following the 2011 Census, it is evident that it would be wrong to rely on the MYE in Central Bedfordshire uncritically. This is particularly evident given that the MYE figures from 2011-2016 that were available at the time that the SHMA was prepared (and which were used to produce the CLG 2014-based household projections) have now been withdrawn and the ONS has now issued updated data following improvements to the methodology, which incorporates a further substantial downward adjustment to the official estimates for Central Bedfordshire.
- It is also important to recognise that although the ONS has now twice reduced the official estimates, they remain higher in this area than the figures published based on the new method for estimating population using administrative data sources that the ONS is currently developing. Given that this new method tends to <u>over-estimate</u> the population (whilst the figures it produces for Central Bedfordshire are <u>lower</u> than the latest revision of the official estimates), I consider that the revised MYEs are still too high for this area with the figures continuing to over-state population growth.
- The SHMA gave careful consideration to the accuracy of the MYE and the resulting CLG projections; and reached the conclusion that a downward adjustment was required. The adjustment is based on reasonable and plausible assumptions that are supported by robust evidence explained in the SHMA. Without these adjustments, any household projections (including the official household projections) would significantly overestimate population growth in Central Bedfordshire. That is the problem with the CLG 2014-based projections. The approach taken in the SHMA to adjusting the CLG projections is reasonable and must be preferred.
- I have completed local housing need analysis for over 50 local authorities, and I have only found this kind of systematic error in the Mid-Year Estimates in two of these areas: Central Bedfordshire and Aylesbury Vale (and the errors identified in Central Bedfordshire are larger than those in Aylesbury Vale). Adjustments to the Aylesbury Vale Mid-Year Estimates equivalent to those I am now suggesting in Central Bedfordshire have been endorsed by the Inspector examining the Vale of Aylesbury Local Plan.
- 3.7 The circumstances in Central Bedfordshire are not unique, but they are exceptional, and it is likely that the household projections for very few local authority areas will be affected in this way.

ONS revisions to the MYE: the national context

- Appendix 2 to my proof sets out the changes that ONS has made to the MYE figures for all local authorities in England. This considers the latest revisions to the MYE for the period 2011-2016 and the earlier revisions for the period 2001-2011 and shows the changes in absolute terms (based on the number of persons) and as a percentage of the overall population:
 - » Table 1 shows the difference in population between the Unrevised 2016 MYE and the Revised 2016 MYE, with the data ranked on this basis.
 - » Table 2 shows the difference between the Unrevised 2016 MYE and the Revised 2016 MYE as a percentage of the Revised 2016 MYE, which is then used to rank the data.
 - » Table 3 shows the change recorded between 2011 and 2016 based on the Unrevised 2016 MYE and the Revised 2016 MYE; and calculates these as a percentage of the 2011 MYE base. The table is ranked based on the percentage point difference between the two percentage figures.
 - » Table 4 shows the difference between the 2011 MYE rolled forward from the 2001 Census (i.e. excluding UPC) and the 2011 MYE rebased to the 2011 Census (i.e. including UPC), with the data ranked on this basis.
 - » Table 5 shows the difference between the 2011 MYE excluding and including UPC as a percentage of the rebased 2011 MYE, which is then used to rank the data.
 - » Table 6 shows the change recorded between the 2001 MYE and the 2011 MYE both excluding and including UPC; and calculates these as a percentage of the 2001 MYE base. The table is ranked based on the percentage point difference between the two percentage figures.
- 3.9 This is the most appropriate way in which to consider the revisions to the data. Note that the London Boroughs have been highlighted given the particular difficulties associated with producing reliable population estimates in this region, and ranks exclude these areas for the same reason.
- 3.10 The six tables collectively show the exceptional nature of the data for Central Bedfordshire.
- 3.11 The area had the seventh largest reduction to the 2016 MYE (within the top 2.5% of all England LAs outside London) which represented the 14th largest percentage reduction and the 13th largest reduction to population change 2011-16 (both within the top 5% of LAs). The area also had the twelfth largest UPC reduction (again within the top 5% of all England LAs outside London) which represented the 24th largest percentage reduction and the 21st largest reduction to population change 2001-11 (both well within the top 10% of LAs).

There is no area outside London (and only Westminster and Kingston-upon-Thames within London) which ranks higher than Central Bedfordshire on all six of these measures. Even when considering the percentage measures in isolation (Tables 2, 3, 5 and 6) only four areas outside London rank above Central Bedfordshire (Charnwood, Forest Heath, Lancaster and Welwyn Hatfield). Whilst the problems that the ONS has recognised and incorporated within revisions to the official MYE for Central Bedfordshire are not unique, they are clearly exceptional.

Alternative approaches

3.13 The Government's standard method intrinsically relies on the CLG 2014-based household projections.

Indeed, PPG makes references to the specific table from which data should be sourced [ID 2a-004-20201216]:

Set the baseline using national <u>household growth projections</u> (2014-based household projections in <u>England</u>, table 406 unitary authorities and districts in <u>England</u>) for the area of the local authority. (emphasis added)

3.14 It continues by emphasising that it is the national projections that should be used in the application of the standard method:

<u>Using these projections</u>, calculate the projected average annual household growth over a 10 year period (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period). (emphasis added)

- 3.15 On this basis, it is clear that the Government considers that the 2014-based household projections form an intrinsic part of the standard method calculation. The standard method adopts a prescriptive calculation with specified data sources that are clearly set out in PPG, with no scope for any variation.
- 3.16 This was confirmed by the Inspector in the Land West of New Road, Clifton (CD9.46), where the decision letter considered the Appellant's proposal to vary the standard method using an untested, hybrid approach:
 - "59. The appellant has put to me that should I reach a finding that the 'text book' three step SM set out in the PPG [Paragraph 004 ID 2a-004-20190220] should not be applied for the purposes of establishing the LHN in this instance, then a mix and match (hybrid) approach could adopted. The hybrid application of the SM could entail at step 1 the use of the 2016 household projections in substitution for the 2014 household projections or applying the SHMA figure of 1,600 to SM's second and third steps. However, calculating the LHN on a hybrid basis would not follow a tried and test

methodology and would introduce the kind of uncertainty in calculating the 5yrHLS that the

Government has sought to avoid through the SM's introduction. I am therefore disinclined to

accept that a hybrid approach to SM's application would be appropriate." (emphasis added)

- 3.17 The standard method is intended to be a straightforward calculation that uses a recognised methodology that can be readily understood. In the view of ORS, the Inspector was right to dismiss the use of a hybrid approach to the standard method's application.
- 3.18 However, given the specific circumstances in Central Bedfordshire, the standard method cannot be relied upon, given its embedded reliance on the CLG 2014-based household projections, which are demonstrably wrong for this area. An alternative approach is therefore necessary.
- 3.19 The only alternative approach for assessing housing need that has been recognised by the Government, and for which national planning policy guidance has been published, is the previous approach that was endorsed by original NPPF and which formed the basis of the methodology used by the SHMA.
- This previous approach is well-established and the SHMA on which it is based is currently being used to inform the emerging Local Plan. Furthermore, the SHMA has been tested in the context of this recognised approach and endorsed by the Luton Local Plan Inspector and considered an appropriate basis for establishing housing requirement for assessing 5-year housing land supply by Inspectors at numerous planning appeals (see Section 2) including six decisions for appeals that were heard after the publication of the latest revision of the NPPF in February 2019 (Appendices 6 to 11).
- The SHMA provides the only alternative to the standard method which is based on a recognised approach. This also used the CLG 2014-based household projections as a starting point, but justified adjustments to those figures when establishing the overall housing need. The SHMA provides the only robust and reliable assessment of housing need for Central Bedfordshire at 1,600 dpa.
- 3.22 Central Bedfordshire has identified a deliverable supply of 8,897 dwellings as of 1 January 2021. Allowing for the agreed 5% buffer leaves a total of 8,473 dwellings delivered over 5 years, equivalent to an average of 1,695 dpa. That represents a growth of 1.37% annually which is higher than the rate of growth used for assessing 5-year housing land supply in the substantial majority of local planning authority areas under the standard method: 82% of all areas outside Greater London (excluding National Parks and other LPAs that are not part of a local council).

4. Overview of the SHMA

The SHMA adopts the CLG 2014-based household projections as the starting point for establishing OAN, an average of 1,792 households per year over the 20-year period 2015-35. However, PPG has previously recognised that "the household projections published by the Department for Communities and Local Government ... have not been tested" [ID 3-030-20140306]; and that this starting point estimate of overall housing need may require adjustment to reflect factors affecting local demography [ID 2a-015-20140306] (emphasis added).

Household projections published by the Department for Communities and Local Government should provide the <u>starting point</u> estimate of overall housing need. The household projections are produced by applying projected household representative rates to the population projections published by the Office for National Statistics ... The household projection-based estimate of housing need <u>may require adjustment to reflect factors affecting local demography</u>

chapter 3 of the SHMA reviews the official population estimates in detail, and taking full account of all of this information, the SHMA establishes alternative household projections for Central Bedfordshire in the context of local demography.

Population Trends

- 4.3 The CLG household projections which provide the starting point estimate of overall housing need are based on the Office for National Statistics (ONS) Sub-National Population Projections (SNPP). This data in turn is based on data from the ONS Mid-Year Estimates (MYE). However, in Central Bedfordshire the MYE component of population change data suggested a net gain of 28,800 people over the 10-year period 2001-2011, but the population of Central Bedfordshire did not actually increase by 28,800 people. In fact, Census data shows that the population increase was only 21,600 people over this period a difference of 7,200 persons.
- The ONS take account of this difference through an "accountancy" adjustment known as "Unattributable Population Change" (UPC) in the Mid-Year Estimate data; however, 7,200 "missing" persons cannot simply be ignored when projecting the future population this is a critical factor affecting local demography.

Given the fundamental importance of population trends, the SHMA considered this issue in detail for Central Bedfordshire (pages 42-46).

- 4.5 As the SHMA demonstrates, in the case of Central Bedfordshire the data quality issues not only persist post Census but in fact compound to increase inaccuracy as time goes on, as the evidence points to the error being explicitly associated with enumeration of migration. PPG explicitly allows for adjustment at a local level, and this would include investigation and correction for 7,200 "missing" persons in establishing robust demographic projections.
- It is generally accepted that data recorded on births and deaths are broadly accurate, therefore either fewer people moved to Central Bedfordshire or more people moved away than the flow data suggests so the remaining "missing" people must be associated with net migration (in its broadest sense).
- A difference of 7,200 persons over a 10-year period implies that, on average, net migration recorded in the MYE component of population change data has been 720 persons too high each year. This is equivalent to more than a third of the population change associated with net migration recorded by the MYE.
- In July 2013, the House of Commons Public Administration Select Committee (PASC) published a report on Migration Statistics (HC 523, July 2013).⁶ This report concludes that "Migration estimates based on the International Passenger Survey [IPS] ... do not provide accurate estimates of international migration to and from local areas". The IPS is a key input to the international migration component of the Mid-Year Estimate. Furthermore, the report cites views from other experts about the quality of this data:

Despite these recent improvements migration statistics are still not fully adequate for the task of producing robust population estimates or understanding patterns of migration (Royal Statistical Society)

The statistics on migration to and from the UK and its constituent parts are inadequate (British Society of Population Studies)

The international migration data are not fit for purpose (Royal Geographical Society)

⁶ https://publications.parliament.uk/pa/cm201314/cmselect/cmpubadm/523/523.pdf

4.9 Chapter 3 of the PASC report deals with local area migration estimates – i.e. estimates of international migration to and from local authority areas. The report quotes the Royal Statistical Society:

There is a continued problem with the quality and quantity of migration data available at a local level. Improvements have been made through the Migration Statistics Improvement Programme by allocating international migrants to local authority areas using administrative data, but the local-level estimates of migration are not robust, particularly for areas with high population turnover. For some local authority areas the Census has shown that the ONS population estimates have misrepresented the level of population growth, a problem caused by inaccurate internal and international migration estimates.

4.10 In addition, the report notes that the UK Statistics Authority has concluded:

The IPS sample size is too small to enable the production of reliable international migration estimates at a local authority level.

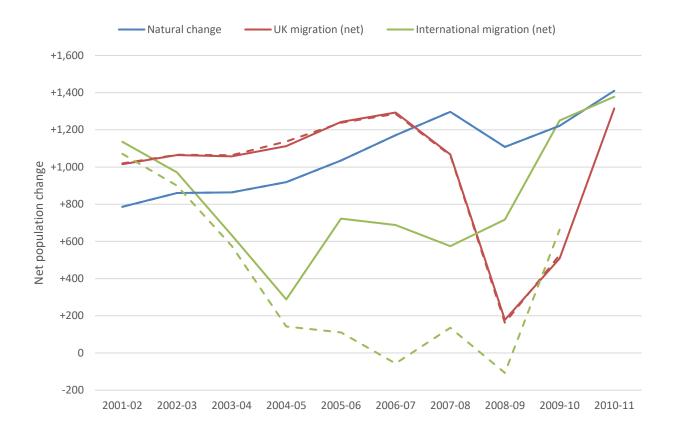
4.11 The chapter concludes (emphasis added):

The International Passenger Survey does not provide accurate estimates of international migration in local areas. The Census provides the most accurate data on the number and characteristics of migrants at the local level, but it is too infrequent to act as a routine source of data. The future of the Census is also uncertain. As the only reliable source of data on migrant populations in local areas, the potential loss of the Census is a concern. Accurate estimates of migration in local authorities must be available independent of the Census. The ONS should develop new sources of data on international migration that are robust enough to provide accurate estimates of annual migration flows to and from local authority areas, even if the Census continues.

- 4.12 Migration is critically important to future population projections, and the SHMA found clear evidence of not just past, but also current issues with the migration trends for both Luton and Central Bedfordshire through the analysis of patients' registration records and also school pupil number records.
- ^{4.13} The SHMA did not rely exclusively on the MYE data, partly due to its inherent weaknesses recognising that short-term migration trends can fluctuate substantially, but also due to evidence of flaws in the MYE data for both authorities.

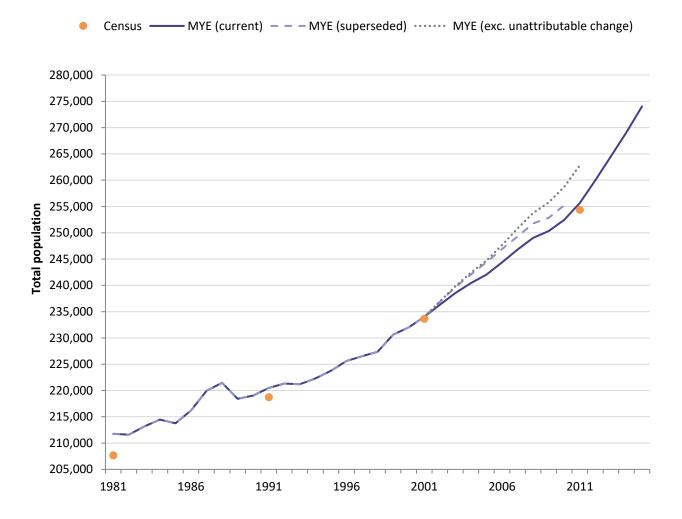
Impact of the ONS Migration Statistics Improvement Programme

- 4.14 The individual components of population change are estimated by the ONS each year when deriving the MYE, however the original estimates for 2001-02 to 2009-10 were revised in the light of the ONS Migration Statistics Improvement Programme (MSIP).
- 4.15 The chart below shows the estimates for Central Bedfordshire. The dashed lines show the original ONS estimates and the solid lines show the MSIP revised estimates. It is evident that the estimates for natural change and UK migration did not change substantively, however international migration estimates changed marginally for the period 2001-04 and were fundamentally revised from 2005-06 onwards.



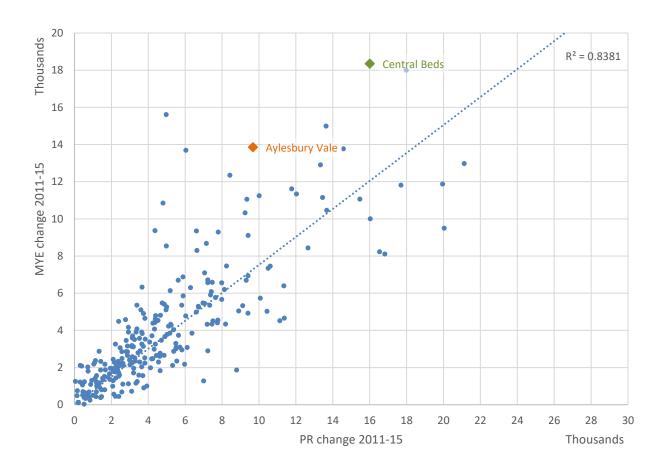
- ^{4.16} The original estimates for international migration identified a net gain of around 3,500 persons over the period 2001-10 whereas the revised figures identified a notably higher gain of around 7,000 persons over the same period. This change led to an additional 3,500 persons being incorporated in the population estimate for mid-2010, which increased from 255,200 to 258,700 persons as illustrated in the chart overleaf.
- 4.17 It is evident that the original estimate (represented by the MYE (superseded) series on the chart) was much closer to the population estimate based on Census data. The MSIP revised estimate (represented by the MYE (exc. UPC) series on the chart) was actually less accurate as it suggested a far higher rate of population

growth than was actually experienced. In other words, whilst the ONS Migration Statistics Improvement Programme improved the population estimates in most local authority areas, the estimates got far worse in Central Bedfordshire.



- ^{4.18} Any systematic problem with the "MSIP improved" population estimates prior to the 2011 Census would continue to affect more recent estimates based on the same methodology. On this basis, the SHMA considered the net population change in the component of change data for 2011-12, 2012-13, 2013-14 and 2014-15 in the context of a range of administrative data (SHMA, figure 14). All identified that the MYE was continuing to overstate population growth.
- ^{4.19} Alternative population data for Central Bedfordshire is carefully considered in the SHMA (figure 40) and in summary, over the 4-year period 2011-15:
 - » The mid-year estimates suggest a population increase of 18,350 persons, which is 15% higher than the 16,010 increase recorded on the NHS patient register;

- » The mid-year estimates suggest an increase of 2,270 children aged 5-14, which is 46% higher than the 1,550 increase on the school Census; and
- » The mid-year estimates suggest an increase of 6,820 people aged 65+, which is **8% higher** than the 6,320 increase in people aged 65+ receiving state pension.
- ^{4.20} Alternative administrative data for population is useful because the figures for the patient register and school places are based on real data returns each year while the MYE is based upon a combination of data returns and a model which also incorporates trend patterns. If trend patterns for an area have been wrong in the past then there is a high probability that they will continue to be wrong in the future.
- ^{4.21} The following chart clearly shows that Central Bedfordshire is an outlier when compared to other areas when comparing Patient Register change and the change in Mid-Year Estimates for the period 2011-15.



- ^{4.22} Any systematic error that existed at the time that the mid-2011 estimates were produced will continue to impact on more recent estimates, and therefore cannot be ignored.
- ^{4.23} All of the administrative data sources that ONS identified for validating the population estimates suggest that the population is increasing slower than suggested by the estimates for the period mid-2011 to mid-2015, especially for those younger age groups that are particularly impacted by migration. On this basis, it

can be concluded that the methodological improvement to estimating migration that the ONS introduced from 2004-05 onwards has created a systematic problem in Central Bedfordshire which has persisted beyond 2011, and it therefore isn't appropriate to adopt this data uncritically. The administrative data clearly justifies the continued need for an adjustment to the MYE in Central Bedfordshire.

- ^{4.24} Whilst the MYE data identified a population of 274,000 persons in 2015, the SHMA concluded that adjustments to migration estimates consistent with those needed to reconcile the data for the period 2001-11 would reduce this to an overall population of 271,500 persons (paras 2.33-34). This is consistent with the growth recorded on the patient register (16,010 persons) which is typically higher than the overall population growth.⁷
- 4.25 This approach used in the SHMA was consistent with the PPG relating to the 2012 NPPF that was applicable at that time, which stated that alternative assumptions may be adopted provided that they were clearly explained, justified and based on robust evidence [ID 2a-017-20140306] (emphasis added).

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. Account should also be taken of the most recent demographic evidence including the latest Office of National Statistics population estimates. Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence.

Revision to the Mid-Year Estimates

- ^{4.26} In March 2018, the ONS revised the Mid-Year Estimates for England and Wales and reissued data for the period 2012-2016. This was due methodological improvements being implemented. The net effect of this change in Central Bedfordshire has been to reduce the population estimate for 2015 (the base year of the plan) by 1,601 persons. In 2016, the adjustment is a reduction of 2,206 persons.
- 4.27 In terms of the components of change data underlying the Mid-Year Estimates in Central Bedfordshire, the largest single revision was to International Emigration, which the revised MYEs estimate to be 99% higher⁸ than that seen in the pre-revision MYEs that inform the 2014-SNPP and therefore the 2014-CLG Household Projections. As such, the nature of this revision agrees with the SHMA's analysis of the pre-revision MYEs being an overestimate, and also that the chief component of change lying behind the data quality issue is

Over the period 2011-15 the patient register increased by 1.90 million persons nationally whereas the ONS population estimates identified an increase of 1.68 million persons over the same period

⁸ Over 2012-2016 the pre-revision MYEs suggest an International Emigration of 2,368. In the revised MYEs this is 4,719, a 2,351 difference

one of migration, specifically the enumeration of International Migration that was profoundly affected by the introduction of the MSIP, as illustrated in the graph following paragraph 4.15 above.

- 4.28 On May 24th the 2016-based Sub-National Population Projections were released, with a projection based on the newly revised Mid-Year Estimates that projects a lower population 2015-35 in Central Bedfordshire than the 2014-version.
- In short, the recent revisions to international migration in the Central Bedfordshire Mid-Year Estimates of Population and the associated reduction in the change in population enumerated by the 2016-based Sub National Population Projection for the plan period (population growth is now estimated to be approximately 9,400 fewer than that calculated using the pre-revision MYEs⁹), all serve to confirm the SHMA's position that the 2014-CLG Household Projections overestimate housing need.
- 4.30 Since the revision to the Mid-Year Estimates in 2016, there have been three further sets of estimates released by the ONS (2017, 2018 and 2019¹⁰). These benefitted from a further set of refinements to the ONS methodology concerning migration. The ONS consider these improvements to the methodology significant; and have decided it would be inappropriate for the 2018-based Sub-National Population Projections to use data from prior to the introduction of this new methodology in its principal projection. They have released details¹¹ explaining that 2018-based SNPP principal projection is therefore based on a two-year migration trend derived purely from the 2017 and 2018 data because of this inherent incompatibility. As a consequence, the principal 2018-based SNPP for Central Bedfordshire demonstrates a significantly lower population growth than in previous years.

Admin-Based Population Estimate

The ONS is developing a new Admin-Based Population Estimate (ABPE) and local authority outputs were published with the version 2.0 release. This data represents outputs from cutting edge research by ONS into a methodology that is intended to be more accurate than that currently used in the production of population statistics. A key aim of this research project is to produce a robust methodology that improves upon the current estimates; ultimately replacing the need for a Census. By way of disclaimer, it should be noted from the outset that these are not official statistics on the population, however they are relevant insofar as they represent the ONS' current best attempt to correct well understood (see paragraphs 4.8 to 4.11 above) shortcomings in it's the existing methodology, as are extant in Central Bedfordshire.

⁹ 2014-SNPP C Beds 2015-35 = 70,600 persons. 2016-SNPP C Beds 35 – 2015 revised MYE = 62,209 persons

¹⁰ Released June 2020

¹¹ https://content.govdelivery.com/accounts/UKONS/bulletins/26c3c03

The ABPE "links" individuals (through their name, date of birth, gender and postcode) as they appear in administrative data, for example connecting a given patient on the Patient Register with their associated record with the Department of Work and Pensions, along with other similar national datasets¹². The table below shows the latest ABPE (v2) statistics (for population 2015) in comparison with the ONS 2014-based Sub-National Population Projections (upon which the CLG 2014-based household projections are based), the 2015 Mid-Year Estimate and the SHMA:

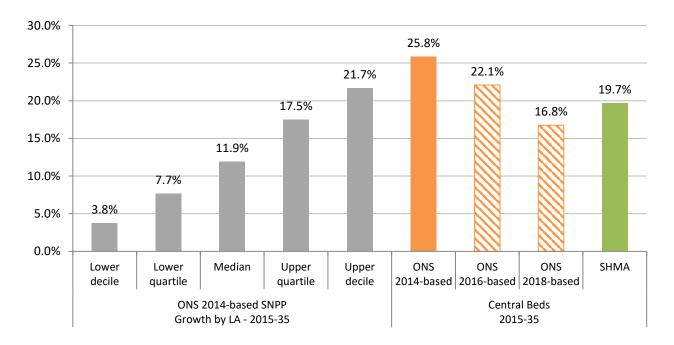
Source	Estimate of Central Bedfordshire 2015 starting population	Difference from SHMA Estimate of 2015 starting population
2014-based Sub-National Population Projection	273,191	+1,662
Original Mid-Year Estimate (now superseded)	274,022	+2,493
Revised Mid-Year Estimate	272,421	+892
Admin-Based Population Estimate (v2)	271,974	+445
ORS SHMA	271,529	-

- 4.33 It can be readily seen that the ONS Admin-Based Population Estimate (v2) is far more closely aligned with the SHMA population estimate than either the original or revised ONS Mid-Year Population Estimate. For 2015 the difference was a matter of 445 persons, or 0.16% of the total population. By contrast, the 2015 Original Pre-Revision MYE (which has since been superseded) exhibits more than five times the deviation from the SHMA estimate than the ABPE (v2).
- 4.34 Although the ABPE do not constitute official statistics, the long-term aim is ultimately to establish a methodology which meets the government-stated ambition "that censuses after 2021 will be conducted using other sources of data". To date, the research has been very successful in estimating the resident population in most gender-age groups; but it is currently prone to <u>over</u>-estimating the number of working age males to some extent so the estimates for England are currently too high.
- ^{4.35} Whilst we cannot be certain that the estimates will be high in every area, there will be more areas that over-estimate than under-estimate the population and the ABPE gives further reason to doubt the MYE in Central Bedfordshire.

¹²https://www.ons.gov.uk/census/censustransformationprogramme/administrativedatacensusproject/methodology/methodologyofstatisticalpopul ationdatasetv20

Migration Assumptions: Reviewing the Outputs

^{4.36} The following chart considers the actual population projections for Central Bedfordshire in the context of all local authority areas.



- ^{4.37} The SHMA (which takes full account of data quality issues that affect local demography) projects that population growth will be 19.7% over the 20-year period 2015-35. This remains within the upper quartile, so is higher than more than three quarters of all local authority areas in England; but it identifies a level of growth that is realistic when compared to the exceptionally high ONS 2014-based SNPP. It is also notable that the more recent official projections show lower rates of growth, albeit still very high.
- The ONS 2014-based Sub-National Population Projections (2014-based SNPP, the population projection that informs the most recent DCLG 2014-based Household Projections) suggested that the population was likely to increase by 25.8% over the period 2015-35 based on 5-year migration trends. This was in the context of median growth across all local authority areas being 11.9% (half of local authorities had growth above this rate, half below this rate); the upper quartile being 17.5% (quarter of local authorities had growth above this rate) and the upper decile being 21.7% (only 10% of local authorities were projected to grow at or above this rate).
- 4.39 It is notable that the 2016-based SNPP show a lower rate of growth, albeit still very high due to the problems with the underlying mid-year estimate data. The projections are very high because the underlying data is wrong. The latest 2018-based SNPP shows an even lower rate of growth. These projections are based exclusively on mid-year estimate data for mid-2017 and mid-2018, which cover the

periods 2016-17 and 2017-18, as this are the only years which use the ONS latest methodology for population estimates. Whilst we cannot be certain that all of the problems seen in previous estimates for Central Bedfordshire have been fully resolved, it is evident that the latest figures project a far less extreme rate of growth for the area. Indeed, they suggest that the SHMA projections might overstate the likely rate of population growth.

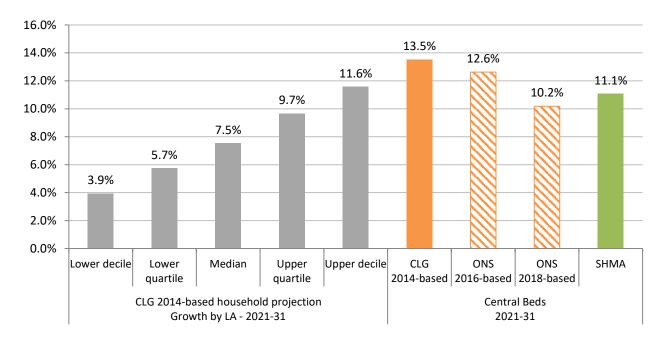
^{4.40} The SHMA projections (which take account of the data quality issues affecting local demography) identify that population growth will be 19.7% over the 20-year period 2015-35. This remains within the upper quartile, so is higher than more than three quarters of all local authority areas in England; but it identifies a level of growth that is realistic when compared to the 2014-based SNPP for all local authority areas.

Population Projections: Summary

- The Mid-Year Estimates have over-estimated the population in Central Bedfordshire. This was most clear in 2011 when the ONS needed to make an "Unattributable Population Change" correction to the Mid-Year Estimates of 7,200 persons in light of the census. It is likely that this issue is lies with components of change due to migration, as is evidenced by the effect of the "Migration Statistics Improvement Programme" (MSIP) in causing the population estimate to deviate substantially from the subsequent census enumeration. Since 2011, the methodology for establishing the Mid-Year Estimates has not changed. As a result, any systemic issue with the quality of data in Central Bedfordshire persists beyond 2011.
- 4.42 In the absence of a Census beyond 2011, the use of administrative data to establish change in population shows that the Mid-Year Estimates continue to over-estimate the population in Central Bedfordshire, resulting in the 2014-based SNPP population projection (based on the previous 5 and 6 years of MYEs) showing one of the highest projected proportional population changes of any authority in the country.
- 4.43 Mid-Year Estimates beyond 2014 continue to exhibit the issue, themselves estimating an even higher population than that projected by SNPP. The current methodology's difficulties with accurately enumerating migration are well understood, and the ONS are attempting to improve on it. The most recent ONS Admin-Based Population Estimate for 2015 is in very close alignment with the SHMA estimate.
- 4.44 The SHMA adjusts for all of these identified issues, and thus yields a robust and reasonable assessment of population change over the plan period. The SHMA has undergone various iterations as more up-to date information has become available, and these iterations have variously been subject to interrogation at both s78 and EiP, satisfying the Inspector in each instance.

Projecting Future Household Numbers

4.45 The following chart shows the distribution of projected household growth for the 10-year period 2021-31 (currently used for the standard method) for all local authorities outside London. The CLG 2014-based figure for Central Bedfordshire is the third highest rate of growth nationally: 13.5% over the 10-year period, approaching double the median rate. The SHMA growth remains very close to the upper decile nationally.



- Through relying on the CLG 2014-based household projections at step 1, the standard method yields an average housing need of 2,335 dpa which equates to 23,350 dwellings over the 10-year period 2021-2031. This compares to the CLG estimate of 123,969 dwellings for the area in 2020. Therefore, the housing need identified by the standard method implies that the dwelling stock should increase by 19% over the next decade. In other words, there should be around one new dwelling built for every five existing homes. It represents around double the rate of growth needed nationally, where there is a need to provide one new dwelling for around every ten existing homes on average; and is considerably higher than the East of England average, where the LHN identifies a need for one new dwelling for around every eight existing homes on average.
- 4.47 There will inevitably be differences in the rate of growth for different areas, but I do not accept that any area can require growth at double the national rate in order to meet <u>local</u> housing need. The rate of growth that the standard method identifies for Central Bedfordshire is the second highest of all local authority areas nationally (outside London). I consider it is an unrealistic assessment of demographic growth, because the underlying data is wrong. The standard method should not be relied upon in this area, on account of the fact that it relies on an embedded dataset which is fundamentally inaccurate.

Establishing Overall Housing Need

- The SHMA sets out the impact of a number of proposed adjustments (figure 92, page 111) and concludes that the overall housing need should be increased from 28,889 dwellings (based on household projections) to 32,000 dwellings (1,600 dpa) over the 20-year period 2015-35. In contrast, the number of dwellings increased by 11,803 between the 2001 and 2011 Census (from 96,889 to 108,692 dwellings), equivalent to 1,180 additional dwellings each year on average. Therefore, the housing need of 1,600 dpa represents a 36% increase in housing delivery. The SHMA provides the only robust and reliable assessment of housing need for Central Bedfordshire, and this will require a substantial increase in housing delivery.
- 4.49 The Council's housing need of 1,600 dpa represents an overall increase in dwellings of 27% over the 20-year Plan period, an average of 1.37% per year. This is a higher housing need than for almost every local plan agreed at examination in the South East and East over recent years, and is of a similar level to areas such as Mid Sussex, Cambridge and East Hertfordshire. It represents a 33% increase on the national delivery rate required to achieve 250,000 homes per year¹³. As such it represents an appropriately ambitious and proportionate target for the Authority.

Assessing Affordable Housing Need

- ^{4.50} The SHMA assessment of affordable housing need was fully consistent with the PPG relating to the 2012 NPPF that was applicable at that time. The SHMA identified that there would be an additional 16,518 households needing affordable housing across the market area (i.e. based on the combined administrative areas of Luton and Central Bedfordshire) over the 20-year period 2015-35. This included 7,997 households in Central Bedfordshire, equivalent to an average of 400 households each year (figure 77).
- 4.51 That analysis was based on a gross unmet need from 6,555 households currently in need of affordable housing across the market area at the 2015 base date of the assessment period, which yielded a net need from 4,775 households after taking account of transfers within the affordable housing stock, together with a future net need from 11,743 households over the 20-year period 2015-35 (figure 76).
- 4.52 The future needs included 24,245 newly forming households (gross) based on 27% of all newly forming households being unable to afford suitable housing (equivalent to an average of 1,212 per year) and a

¹³ Also note that this corresponds to an 11% increase on the national delivery rate required for 300,000 homes per year; but this will be a rate sustained for the 20-year plan period 2015-35 whereas the 300,000 figure is a target to be reached by the mid-2020s and not a rate that would be sustained for a 20-year period

gross total of 14,151 existing households falling into need (an average of 708 per year). That is entirely consistent with PPG, which states that a gross annual estimate should be identified.¹⁴

4.53 In summary, the SHMA analysis included:

- » An allowance for existing need at the start of the plan period (i.e. backlog);
- » Needs arising each year over the plan period from:
 - Newly forming households unable to afford suitable housing; but also
 - Inward migrant households unable to afford suitable housing; and
 - Previously established households whose circumstances change such that they are no longer able to afford suitable housing;

» Offset against:

- Existing affordable housing likely to be vacated; and
- Other changes in circumstance which led to households whose needs had been counted no longer needing affordable housing.
- The SHMA analysis identifies the gross flows of newly forming and migrant households across all age groups and considers the affordability of each group independently (figure 74). The affordability analysis is based on detailed administrative data published by the Department for Work and Pensions (DWP) about households that are in receipt of housing benefit and resident in the local authority areas. This is used to determine the proportion of different types of household (by age and household composition) who are able and unable to afford their housing costs (figure 70). These proportions are then combined with the demographic projections to assess future affordable housing need.
- Households currently receiving housing benefit are <u>not</u> counted as needing affordable housing by the SHMA (para 4.109). By definition, these households <u>can</u> afford suitable housing in the market. They receive a welfare payment which specifically covers their rent; so would only be unable to afford if that payment was withdrawn. That would be a policy decision, and housing need should be established on a policy neutral basis. It would be wrong for any assessment of housing need to assume that housing benefit was withdrawn. The impact of any change to policy should only be considered when establishing housing requirement.

PPG "Housing and economic needs assessments" March 2014 [ID 2a-025-20140306] and February 2019 [ID 2a-021-20190220]

- 4.56 Whilst the PPG makes no reference to the use of housing benefit claims when establishing affordability, this provides a reasonable proxy for identifying households who cannot afford to meet their housing needs in the market. Furthermore, as the analysis is based on detailed administrative data informed by the real-life circumstances of households actually resident in the market area, it is considerably more robust than any other approach.
- 4.57 The use of housing benefit claims was specifically endorsed by the Inspectors that recently examined the Bedford Local Plan. In their report, they concluded (CD12.2):
 - 36. The SHMA identifies that, included within the OAN of 14,550 new dwellings, there is a need for 278 affordable homes each year. This figure has been derived broadly in line with the approach advocated in the PPG although notably, amongst a number of differences from the PPG approach, it is informed by housing benefit claims rather than an assessment of the minimum household income required to access lower quartile market housing. However, the PPG is only guidance on how the need for affordable housing can be estimated and receipt of housing benefit is a realistic and reasonable proxy for estimating the number of households "who lack their own home or live in unsuitable housing and who cannot afford to meet their housing needs in the market". This is, in effect, the PPG's definition of those in need of affordable housing.
- 4.58 The Luton & Central Bedfordshire SHMA was based on the same methodology as the Bedford SHMA, and both studies are fully <u>consistent</u> with the PPG relating to the 2012 NPPF that applicable at the time they were produced. However, as noted by the Bedford Inspectors, there are a number of differences from the PPG approach.
- Aside from the use of housing benefit claims, the SHMA also departs from the PPG approach in taking account of established households whose circumstances change such that they can afford suitable housing in the market and therefore no longer need affordable housing. Nevertheless, whilst PPG does not explicitly state that these needs should be discounted, it does state that "care should be taken ... to include only those households who cannot afford to access suitable housing in the market", 15 so it is evident that counting the needs of households whose circumstances improve such that they can "afford to access suitable housing in the market" would be contrary to the PPG.
- 4.60 The SHMA also takes account of dissolving households and out-migrant households that have been counted within the gross need for affordable housing, and discounts these from the net affordable housing need

¹⁵ This statement is quoted in the PPG section "Housing and economic needs assessments" March 2014 [ID 2a-024-20140306] and February 2019 [ID 2a-020-20190220] and also "Housing needs of different groups" July 2019 [ID 67-006-20190722]

regardless of whether or not they ever occupy affordable housing. Whilst PPG does not explicitly state that these needs should be discounted, it is evident that such households will not need housing in the housing market area, so it stands to reason that they will no longer need affordable housing either — otherwise these households would be counted within the affordable housing need despite not being counted in the overall housing needs, which would be irrational.

- 4.61 Although PPG does not provide any specific guidance about the treatment of households that no longer need housing in the housing market area that have been counted in the gross need for affordable housing, it is evidently necessary for their needs to be discounted from the overall affordable housing need. It is a simple concept that any household that does not need a dwelling will not need an affordable dwelling so these needs must be discounted when establishing the total need for affordable housing, which should be based on the "total net need".
- ^{4.62} As previously noted, the Inspectors examining the Bedford Local Plan explicitly recognised that "the PPG is only guidance on how the need for affordable housing can be estimated" and it is entirely appropriate for the SHMA to take account of these factors when assessing the need for affordable housing; implementing the relevant parts of the NPPF and PPG will inevitably depend on professional judgement.
- ^{4.63} Such approach was endorsed in the case of Borough Council of Kings Lynn and West Norfolk v Elm Park Holdings Ltd Judgement, where Mr Justice Dove discussed in detail the issue of making an allowance for second homes and vacant dwellings when calculating Objectively Assessed Needs under the original NPPF and previous PPG. He noted that (emphasis added):

39 This is all background to answering the question of whether or not the Inspector was correct to include second homes and vacancies in his assessment of the FOAN in this case. I am satisfied that he was. These elements were empirically based from the 2011 census and indicated a trend whereby a certain portion of the housing in the district was not in fact being used by the indigenous population, and therefore was not available to meet housing need. He was therefore entitled to form the view as a matter of judgment based on the empirical material that an allowance should be made for the prospect of that trend continuing. It is true that this involves a judgment about applying the census-based figure as a trend, but that in my view is precisely the kind of statistical judgment which is involved in determining the FOAN and the Inspector was right to countenance it.

40. Mr Leader contended that it was in reality the application of a policy, namely the perpetuation of the existing quantum of existing homes and vacancies in the housing stock, and therefore as the implementation of a policy it was not a legitimate exercise pursuant to paragraph 47. That

argument is ingenious but in my view clearly puts the matter the wrong way round. In the two-stage process envisaged by paragraph 47, (that is to say in summary, firstly, determining the FOAN and secondly applying policy to it), it will be entirely open to the claimant to impose a policy in the second stage to arrest or reverse the number of vacancies or affordable homes in their planned housing stock and that could potentially lead to a reduction in housing requirements. But taking account of the existing extent of vacancy and second homes and projecting it forwards is clearly part of the statistical assessment of housing needs and part and parcel of the FOAN equation at the first stage.

- 41. The PPG does not provide any specific guidance on this point related to vacancies and second homes. That is to my mind unsurprising, as it could not begin to address every conceivable point which might arise in this exercise. However, I have no doubt that the inclusion of vacancies and second homes is an adjustment based on statistical data of a kind similar to those which are contemplated in the PPG. The absence of this issue from the PPG does not therefore dissuade me from the view which I have reached.
- 4.64 On this basis, Mr Justice Dove acknowledges that national guidance will necessarily not anticipate every eventuality and observes that the implementation of the relevant paragraphs of the NPPF and PPG when assessing housing need will require professional judgement. The PPG does provide an appropriate framework for understanding affordable housing needs, but professional judgments are still required to ensure that the modelled outputs reflect reality.
- 4.65 The SHMA provides a detailed and robust assessment of affordable housing need that fully accords with the PPG that was applicable at the time that the assessment was produced.

5. In Conclusion

This Appeal is being considered under the revised National Planning Policy Framework (Revised NPPF, February 2019). Paragraph 73 of the Revised NPPF states that:

Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies³⁶, or against their local housing need where the strategic policies are more than five years old³⁷.

In Central Bedfordshire, the strategic policies are more than five years old and therefore the supply of specific deliverable sites should be based on local housing need. Given this context, footnote 37 states that:

Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.

- Planning Practice Guidance [ID 2a-004-20190220] sets out the standard method based on a four-step approach.
 - » Step 1 sets the baseline using the CLG 2014-based household projections for the area;
 - » Step 2 applies an adjustment to take account of local affordability;
 - » Step 3 caps the level of any increase depending on the current status of relevant policies;
 - » Step 4 applies a 35% uplift for those authorities in the top 20 cities and urban centres list.
- For Central Bedfordshire, the household projections identify an increase from 124,594 households in 2021 to 141,432 households in 2031; an overall growth of 16,838 households over the 10-year period, equivalent to an average of 1,684 households per year. The most recent median workplace-based affordability ratio is 10.19 for 2020, and based on the PPG calculation set this yields an adjustment factor of 1.3869 at step 2. Applying this adjustment factor to the household growth yields a local housing needs figure of 2,335 dwellings per annum. Neither step 3 or step 4 of the standard method currently apply in this area. The Council agrees that this is the local housing need figure that national policy provides would normally be

used for assessing whether a five-year housing land supply exists; but this figure cannot be relied upon in Central Bedfordshire.

- The SHMA provides the only robust and reliable assessment of Housing Need for Central Bedfordshire that is based on a recognised methodology for which national planning guidance has been published. This provides the basis for the Local Housing Need using a justified alternative approach to the Government's standard method which cannot be relied upon in this area. It also ensures consistency with the emerging Local Plan.
- The SHMA forms part of the evidence base for the Central Bedfordshire Emerging Local Plan, and uses the tried and tested method that fully complies with the approach required by the original National Planning Policy Framework (NPPF, March 2012). It is also entirely consistent with the associated Planning Practice Guidance on the Assessment of housing and economic development needs (PPG, March 2014 and all subsequent updates which pre-date the revised Framework).
- The SHMA methodology was tested at the Luton Local Plan Examination and the Inspector considered the approach taken to be justified and reasonable, and that the OAN figure for the combined Luton and Central Bedfordshire area, together with the apportionment between the two local planning authorities, to be appropriate. He recognised the need for the SHMA to take account of the latest information, and the current SHMA provides this update. The SHMA was also tested at the Central Bedfordshire Local Plan examination. The Central Bedfordshire Local Plan Inspectors have yet to issue their final report, but they have not raised any concerns about the OAN or the housing requirement during the course of their examination, and consultation is underway on the proposed Main Modifications which do not propose any changes to the OAN or the housing requirement.
- The current and previous SHMAs have been tested at several planning inquiries in Central Bedfordshire, in which the Council's OAN was consistently considered the most appropriate basis for assessing 5-year housing land supply. In each case, the Council has argued that the official population estimates for the area cannot be relied upon and as a consequence the official projections do not provide a robust starting point. The reliability of the local population data has been tested extensively and the Council's arguments have routinely been found to be sound.
- 5.9 The Council recognises that 2019 NPPF requires that five-year housing land supply should be judged against housing need calculated using the standard method set out in the planning practice guidance (PPG) and that its approach now represents a departure from national planning policy. However, the Council's position has been explicitly endorsed by Inspectors at six separate planning appeals since May 2019,

including one that was subject to a High Court challenge; the Secretary of State elected to defend that decision and permission for the application was refused by the High Court. Whilst the 2019 NPPF does not provide for departures from the standard method, the Council's approach is legal and justified.

- The CLG 2014-based household projections for Central Bedfordshire do not provide a realistic assessment of demographic growth. This is due to problems with the ONS 2014-based sub-national population projections (SNPP) caused by errors in the ONS mid-year population estimates. The SHMA considered these issues in detail and established independent population estimates and household projections which took account of all of the local evidence and provide a realistic assessment of demographic growth.
- Through relying on the CLG 2014-based household projections at step 1, the standard method yields an average housing need of 2,335 dpa which equates to 23,350 dwellings over the 10-year period 2021-2031. This compares to the CLG estimate of 123,969 dwellings for the area in 2020. Therefore, the housing need identified by the standard method implies that the dwelling stock should increase by 19% over the next decade. In other words, there should be around one new dwelling built for every five existing homes. The Council believes that the standard method produces an unrealistic assessment of demographic growth, because the underlying data is wrong.
- 5.12 Central Bedfordshire has identified a deliverable supply of 8,897 dwellings as of 1 January 2021. Allowing for the agreed 5% buffer leaves a total of 8,473 dwellings delivered over 5 years, equivalent to an average of 1,695 dpa. That represents a growth of 1.37% annually which is higher than the rate of growth used for assessing 5-year housing land supply in the substantial majority of local planning authority areas under the standard method.
- 5.13 Whilst the changes to the NPPF introduced in February 2019 seek to restrict any departures from the standard method set out in national planning guidance when strategic policies are more than five years old, this is only policy and it would be wrong to follow such policy blindly when there is clear evidence that demonstrates inaccuracies in the underlying data. The standard method cannot be relied upon in this area due to problems with the data on which it depends.
- Planning policy necessarily admits that there will sometimes be exceptions; where it would be irrational to apply a general policy given the specific local circumstances. In my view, the official household projections for Central Bedfordshire are wrong. As previously set out, numerous Inspectors have accepted that the official population estimates cannot be relied upon in this housing market area and the Inspectors examining the Central Bedfordshire Local Plan have not raised any concerns over the course of their

examination, with no changes to the OAN or housing requirement proposed within the Main Modifications.

There are problems with the estimates for both Luton and Central Bedfordshire.

- The SHMA prepared demographic projections that took full account of local demographic issues which are complex across the HMA. The household projections are based on the Government's favoured headship rates from the CLG 2014-based household projections which take full account of data from the 2011 Census. The Council's OAN of 32,000 dwellings (1,600 dpa) represents an overall increase in dwellings of 27.3% over the 20-year Plan period, an average of 1.4% per year. This represents an ambitious and realistic target for the area.
- The SHMA provides the only robust and reliable assessment of housing need that is based on a recognised methodology for which national planning guidance has been published. The SHMA identifies the housing need for Central Bedfordshire at 1,600 dpa. This provides the basis for the Local Housing Need using a justified alternative approach to the Government's standard method, which cannot be relied upon in this area. It also ensures consistency with the emerging Local Plan.
- Due to the problems with the standard method in Central Bedfordshire, a number of appeal Inspectors have already endorsed the Council's position that the SHMA continues to provide the most appropriate basis for establishing Local Housing Need for the purpose of assessing 5-year housing land supply in the context of the February 2019 revision of the NPPF.

Appendix 1

CBC Response to PINS re. 3219983 Land off Cobbitts Road

11 April 2019

From: Planning Appeals

To: west2@pins.gsi.gov.uk

Subject: RE: Planning Inspectorate APP/P0240/W/18/3211551: Land South of Limbersey Lane MK45 2EA

Date: 11 April 2019 10:04:00

Good morning

The councils response to your email of 8th April 2019 is as follows:-

The NPPF directs that five year supply should be based on the standard method. However, exceptionally in the context of Central Bedfordshire it is both unsafe and perverse to rely on the standard method as a measure of local housing need. Housing need should be based on realistic assumptions of demographic growth. The 2014-based household projections (on which the standard method relies) do not provide a realistic assessment of demographic growth for Central Bedfordshire. This is due to problems with the population estimates for the local area. These shortcomings have been recognised in numerous section 78 appeal decisions (such as Readshill Quarry, Biggleswade Road Potton and Sutton Road Potton). It would therefore be unsound to rely on the standard method in Central Bedfordshire.

The NPPF is only policy, not statute. It is well-established that any policy should not be followed blindly. This is especially important when there are known inadequacies or shortcomings in respect of the particular data/ factual matrix which a policy directs should be applied in a particular instance. The NPPF is a national policy document and does not prohibit discretion as to whether there may be exceptions to its application in particular local circumstances; policy necessarily admits of exceptions.

The Council's SHMA has been recognised as an up to date expression of local housing need in the context of Central Bedfordshire. The Luton Local Plan Inspector endorsed the methodology and s78 appeal Inspectors have consistently endorsed it as the most accurate expression of need in Central Bedfordshire. Therefore, having regard to the SHMA as the expression of local housing need the Council considers that it can demonstrate a five year supply of deliverable housing land.

Kind Regards

Oonagh Stidolph

Customer & Operations Officer
Business Performance & Improvement Service
Regeneration and Business Directorate

Central Bedfordshire Council Priory House, Monks Walk, Chicksands, Shefford, Bedfordshire, SG17 5TQ

Direct dial: 0300 300 4802 | Internal: 74802 | Mobile: 07768278440 Email: oonagh.stidolph@centralbedfordshire.gov.uk

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Information security classification* of this email: **UNCLASSIFIED**

*Information security definitions:

OFFICIAL – Loss could cause some damage to the Authority

OFFICIAL – SENSITIVE – Loss could cause severe damage to the Authority

UNCLASSIFIED – Loss would cause little or no damage to the Authority

From: west2@pins.gsi.gov.uk <west2@pins.gsi.gov.uk>

Sent: 08 April 2019 13:24

To: Planning Appeals < Planning. Appeals@centralbedfordshire.gov.uk >

Subject: Planning Inspectorate APP/P0240/W/18/3211551: Land South of Limbersey Lane MK45

2EA

The Planning Inspectorate (England)
Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN

The Planning Inspectorate (Wales) Crown Buildings, Cathays Park, Cardiff, CF10 3NQ

http://www.planningportal.gov.uk/planninginspectorate

Twitter: open PINSgov

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Appendix 2

ORS tables summarising ONS revisions to the official Mid-Year Population Estimates for local authority areas in England 2011-2016 and 2001-2011

August 2019

Table 1
Comparison of Unrevised 2016 MYE and Revised 2016 MYE

Rank (exc London)	Local Authority	Unrevised 2016 MYE	Revised 2016 MYE	Difference (persons)	
1	Cambridge	131,799	124,635	-7,164	
-	Haringey	278,451			
2	Oxford	161,291			
-	Westminster	247,614	•		
3	Lambeth Bournemouth	327,910 197,657	•	•	
-	Tower Hamlets	304,854			
4	Southampton	254,275			
-	Lewisham	301,867			
-	Hounslow	271,139	•		
5	Newcastle upon Tyne	296,478	293,713	-2,765	
-	Hillingdon	302,471	299,899	-2,572	
-	Kingston upon Thames	176,107			
6	Exeter	129,801			
7	Central Bedfordshire	278,937	•		
-	City of London	9,401			
8 9	Brighton and Hove Charnwood	289,229 179,389			
9 10	Plymouth	264,199			
-	Brent	328,254			
11	Kirklees	437,047			
12	Lancaster	143,517	·		
13	Bradford	534,279			
-	Waltham Forest	275,843			
14	Medway	278,542	•		
-	Southwark	313,223	311,655	-1,568	
15	Wycombe	176,868	175,363	-1,505	
16	Portsmouth	214,832	· · · · · · · · · · · · · · · · · · ·	-1,497	
17	York	208,367	•	•	
18	Sheffield	575,424			
-	Barnet	386,083			
19	Norwich	141,041	· ·		
20	Guildford	148,020			
21 22	Forest Heath Welwyn Hatfield	64,447 121,996	·		
23	Northampton	225,474			
24	South Gloucestershire	277,623			
25	Warwick	140,411			
26	Luton	216,791			
-	Islington	232,865	232,055	-810	
27	Bath and North East Somerset	187,751	186,946	-805	
28	Poole	151,500	150,711	-789	
29	Preston	141,801	·		
30	Stockport	290,557			
31	Calderdale	209,770			
-	Richmond upon Thames	195,846			
32 33	Leeds Sunderland	781,743 277,962			
34	Maidstone	166,360			
-	Greenwich	279,766			
35	Salford	248,726			
36	Gravesham	106,808			
37	Epsom and Ewell	79,588			
38	Broxtowe	112,671			
39	Fenland	100,182	99,636	-546	
40	Runnymede	86,889			
41	Nottingham	325,282			
42	Stafford	134,155			
43	Trafford	234,673			
44	South Cambridgeshire	156,468			
45 46	Aylesbury Vale	193,113	•		
46 47	Dartford	105,543			
47 40	Worcester	102,338			
48 49	Lincoln Epping Forest	97,795 130,321	· ·		
49 50	Oldham	130,321 232,724			
50 51	County Durham	522,143			
52	Reigate and Banstead	145,648	·		
53	Peterborough	197,095			
54	Newcastle-under-Lyme	128,467			
<u> </u>	Newcastie-under-tyme	·	·		
55	West Lancashire	113,401	113,001		
	-	113,401 117,530			
55	West Lancashire		117,217	-313	
55 56	West Lancashire Cheltenham	117,530	117,217 273,239	-313 -287	
55 56 -	West Lancashire Cheltenham Hackney	117,530 273,526 126,151 202,220	117,217 273,239 125,871 201,945	-313 -287 -280	
55 56 - 57 - 58	West Lancashire Cheltenham Hackney Ashford	117,530 273,526 126,151 202,220 110,261	117,217 273,239 125,871 201,945 110,002	-313 -287 -280 -275 -259	
55 56 - 57 - 58 59	West Lancashire Cheltenham Hackney Ashford Sutton Wyre Dacorum	117,530 273,526 126,151 202,220 110,261 152,692	117,217 273,239 125,871 201,945 110,002 152,445	-313 -287 -280 -275 -259 -247	
55 56 - 57 - 58	West Lancashire Cheltenham Hackney Ashford Sutton Wyre	117,530 273,526 126,151 202,220 110,261	117,217 273,239 125,871 201,945 110,002 152,445 96,091	-313 -287 -280 -275 -259 -247 -236	

Rank (exc London)	Local Authority	Unrevised 2016 MYE	Revised 2016 MYE	Difference (persons)
62	South Tyneside	149,418	•	
63	Hinckley and Bosworth	110,102		
64 65	Daventry North West Leicestershire	81,316 98,644	•	
66	Kingston upon Hull, City of	260,240		
67	Watford	96,773	•	
68	East Hertfordshire	146,309	146,130	-179
69	Great Yarmouth	99,164		
70	Shepway	111,190		
71	Bury	188,669		
72 73	Harborough North Norfolk	90,416 103,752	•	
73 74	North Dorset	71,064	•	
7 . 75	Hyndburn	80,537	•	
76	Blaby	97,703		
77	Tandridge	86,665		
78	Gloucester	128,488	128,355	-133
79	Sevenoaks	119,142		
80	Harlow	85,995	•	
81	Swale	145,042		
82 83	Rossendale South Northamptonshire	69,886 89,959		
84	North Hertfordshire	132,747		
85	Sedgemoor	121,436		
86	Eastleigh	129,635		
87	Chorley	114,351		
88	Vale of White Horse	128,738	128,653	-85
89	Sandwell	322,712		
90	Tameside	223,189	•	
91	Dudley	317,634		
92	Pendle Middleshrough	90,588	•	
93 94	Middlesbrough Tewkesbury	140,398 88,589	•	
9 4 95	Kettering	99,002	•	
-	Harrow	248,752		
96	Broadland	127,455		
97	Eastbourne	103,054		
98	North Warwickshire	63,229	63,193	-36
99	Rushcliffe	115,204	•	
100	Spelthorne	98,902		
101	Derby	256,233	•	
102 103	Burnley Cannock Chase	87,522 98,534		
103	Carlisle	108,409		
105	East Dorset	89,093		
106	South Staffordshire	111,180	•	
107	Copeland	69,307		
108	Bromsgrove	96,769	96,770	+1
109	Eden	52,639		
110	Purbeck	46,336		
111	Tonbridge and Malling	127,293		
112 113	South Ribble North Lincolnshire	110,118 170,786		
114	Castle Point	89,731		
115	Isles of Scilly	2,308	•	
116	St. Helens	178,455		
117	Forest of Dean	85,385	85,411	+26
118	North East Derbyshire	100,423		
119	North Devon	94,615		
120	Hartlepool	92,817	•	
121	Ashfield	124,482	124,513	
122	Reading	162,666		
123 124	Craven Rochford	56,308 85,670		
124	Ribble Valley	58,826	•	
126	Cheshire West and Chester	335,680	•	
127	Torridge	66,977		
-	Kensington and Chelsea	156,726	•	
128	Hambleton	90,537	•	
129	Tamworth	76,955		
130	Manchester	541,263	•	
131	High Peak	91,662		
132 133	Teignbridge Bedford	129,856 168 751		
133 134	Веатога North Somerset	168,751 211,681		
134	Maldon	63,350	•	
125				
135 136		1በዩ 674	111/2 ///-	F/4
136	West Oxfordshire	108,674 65.371		
136 137	West Oxfordshire Weymouth and Portland	65,371	65,447	+76
136	West Oxfordshire		65,447 162,502	+76 +86
136 137 138	West Oxfordshire Weymouth and Portland Canterbury	65,371 162,416	65,447 162,502 148,001	+76 +86 +86
136 137 138 139	West Oxfordshire Weymouth and Portland Canterbury Knowsley	65,371 162,416 147,915	65,447 162,502 148,001 104,527	+76 +86 +86 +87

Rank (exc London)	Local Authority	Unrevised 2016 MYE	Revised 2016 MYE	Difference (persons)
143	Breckland	137,032	137,123	+91
144	Stroud	117,381		
145	Mid Devon	79,789	•	
146	Redcar and Cleveland	135,404	-	
147	Chiltern	95,103	-	
148	Uttlesford	86,188	•	
149	Broxbourne Wyra Farast	96,779	· ·	
150 151	Wyre Forest Staffordshire Moorlands	99,902 98,069	-	+105 +107
151	East Riding of Yorkshire	337,696	<u>-</u>	
153	Chelmsford	174,089		
154	Corby	68,187	•	
155	Adur	63,506		
156	Redditch	84,971		
157	West Dorset	101,382	-	
158	South Norfolk	132,837	132,965	+128
159	Gosport	85,363	85,492	+129
160	South Holland	92,387	· ·	+140
161	Allerdale	96,956	97,099	
162	Three Rivers	92,533		
163	Bolsover	78,082		
164	Richmondshire	53,732	-	
165	Boston	67,564		
166 167	Amber Valley	124,645	· ·	
	West Devon	54,582 77,000		+160
168 169	Fylde Warrington	77,990 208,809		+163 +164
170	Christchurch	49,481	49,645	+164
171	Oadby and Wigston	55,825	55,991	+166
172	West Lindsey	93,734	· ·	+169
173	West Somerset	34,306	-	
174	Crawley	111,375		
175	Walsall	278,715	278,887	+172
176	South Bucks	69,636	69,809	+173
177	Thanet	140,652	140,828	+176
178	Wellingborough	78,191	78,367	+176
179	Hertsmere	103,528		
180	Rochdale	216,165		
181	Derbyshire Dales	71,288	-	
182	Wychavon	122,943	-	
183	Stevenage Vingle Lynn and West Norfelle	87,081		
184 185	King's Lynn and West Norfolk Barrow-in-Furness	151,589 67,321		
186	Rotherham	261,930		
187	Erewash	114,891		
188	Herefordshire, County of	189,309		
189	Braintree	150,999		
190	East Staffordshire	116,701		
191	Gedling	116,501	116,746	+245
192	Lewes	101,381	101,631	+250
193	Havant	123,640	123,891	+251
194	Wakefield	336,834		
195	North Tyneside	203,307		
196	Selby	86,667		
197	Stockton-on-Tees	195,681		
198	Newark and Sherwood	119,570		
199	Bracknell Forest	119,447		
200 201	Tunbridge Wells Arun	117,069 156,997	· ·	
201	New Forest	179,236		
203	Cherwell	146,338	· ·	+297
204	East Lindsey	138,443	•	+300
205	Coventry	352,911		
206	Surrey Heath	88,387		
207	Scarborough	107,824		
-	Bexley	244,760		
208	Rutland	38,606	38,949	+343
209	Dover	114,227	114,572	+345
210	North Kesteven	113,297		
211	East Devon	139,908	-	
212	East Cambridgeshire	87,825	-	
213	Bassetlaw	114,847		
214	Cotswold	85,756		
215	Ryedale	53,486		
216 217	East Northamptonshire	90,999 76,386	· ·	
217 218	Brentwood Basildon	76,386 183,378		
218	Fareham	115,423		
219	Solihull	211,763		
221	Halton	126,903		
222	Rother	93,551	-	
223	Bolton	283,115		
224	Malvern Hills	76,130		

Rank (exc London)	Local Authority	Unrevised 2016 MYE	Revised 2016 MYE	Difference (persons)
225	Huntingdonshire	175,666		
226	Stoke-on-Trent	253,226	·	
227	Mansfield	107,435		
228	Mid Sussex	147,089	·	
229	St Edmundsbury	112,938	·	
230	Taunton Deane	115,515	·	+454
231	Wigan	323,060	·	
231	•	139,798	<u>-</u>	
	Isle of Wight	•	· · · · · · · · · · · · · · · · · · ·	
233	Wealden	157,575	·	+479
234	Horsham	138,018	· · · · · · · · · · · · · · · · · · ·	
235	Torbay	133,883	134,406	+523
236	South Hams	84,306	<u>-</u>	+528
237	South Lakeland	103,274	·	
238	Slough	147,181	147,736	+555
239	Mendip	112,545	·	+586
-	Havering	252,783	•	
240	Sefton	274,261	274,853	+592
241	Cheshire East	376,695	·	+608
242	Barnsley	241,218	241,847	+629
243	Hart	94,250	94,882	+632
244	Basingstoke and Deane	174,588	175,226	+638
245	Worthing	108,605	109,246	+641
246	Waveney	116,514	117,167	+653
247	Nuneaton and Bedworth	127,019	127,674	+655
248	Hastings	92,236	92,903	+667
249	Swindon	217,905	218,580	+675
250	Darlington	105,646	106,327	+681
251	North East Lincolnshire	159,144	159,828	+684
-	Bromley	326,889	327,580	+691
252	Mid Suffolk	100,014	100,720	+706
253	South Kesteven	140,193		
-	Enfield	331,395		
254	St Albans	146,282	•	
255	East Hampshire	117,955		
256	Telford and Wrekin	172,976		
257	Babergh	89,498	•	
258	Tendring	142,598	•	
259	Test Valley	122,044	·	
260	Blackpool	•	· · · · · · · · · · · · · · · · · · ·	
261	Southend-on-Sea	139,195		
261		179,799		
262	Waverley Windsor and Maidenhead	123,768		
		148,814	·	
264	South Somerset	165,645	<u>-</u>	
265	Chichester	118,175		
266	Doncaster	306,397		
267	Wirral	321,238		
-	Croydon	382,304		
268	Colchester	186,635		
269	Shropshire	313,373		
270	South Oxfordshire	138,128		
271	Mole Valley	86,223		
272	Gateshead	201,592	·	
273	Stratford-on-Avon	122,276		
274	Winchester	121,965		
275	Leicester	348,343		
276	Wokingham	161,878	·	
277	Cornwall	553,687		•
278	Wolverhampton	256,621		
279	Thurrock	167,025		
280	Blackburn with Darwen	147,049	•	•
281	Northumberland	316,002	317,444	+1,442
282	Rugby	103,815	105,291	+1,476
-	Ealing	343,196	344,802	+1,606
-	Merton	205,029	206,706	+1,677
-	Barking and Dagenham	206,460	208,182	+1,722
283	Woking	99,695	101,421	+1,726
284	West Berkshire	156,837		
285	Bristol, City of	454,213		
286	Milton Keynes	264,479		
287	Suffolk Coastal	125,955	<u>-</u>	
-	Redbridge	299,249		
-	Hammersmith and Fulham	179,654	•	+2,129
288	Ipswich	135,908		
-	Camden	246,181		
289	Liverpool	484,578	•	
290	Elmbridge	132,764		
290 291	Harrogate	156,312		
291	Birmingham	1,124,569		
434	Newham			
202	Wiltshire	340,978		
293	Wandsworth	488,409 316,096		
_	vvariasvvortil	310,030	321,437	T3,401

Table 2
Comparison of Unrevised 2016 MYE and Revised 2016 MYE with % change

Rank		Unrevised	Revised	Difference	Difference	
exc London)	City of London	2016 MYE 9,401	2016 MYE 7,246	(persons) -2,155	(%) -29.74%	
1	Cambridge	131,799			-5.75%	
2	Oxford	161,291			-3.86%	
-	Haringey	278,451	272,078	-6,373	-2.34%	
-	Westminster	247,614	241,974	-5,640	-2.33%	
3	Bournemouth	197,657			-2.07%	
4	Forest Heath	64,447	63,298		-1.82%	
5	Exeter	129,801	127,522		-1.79%	
6	Southampton Lambeth	254,275 327,910	·	-3,898 -4,847	-1.56% -1.50%	
-	Kingston upon Thames	176,107	173,703	-2,404	-1.38%	
<u>-</u>	Tower Hamlets	304,854			-1.30%	
7	Lancaster	143,517			-1.27%	
8	Charnwood	179,389	•	•	-1.13%	
-	Hounslow	271,139			-1.07%	
-	Lewisham	301,867	298,903	-2,964	-0.99%	
9	Newcastle upon Tyne	296,478	293,713	-2,765	-0.94%	
10	Wycombe	176,868			-0.86%	
-	Hillingdon	302,471	299,899	-2,572	-0.86%	
11	Norwich	141,041	139,865		-0.84%	
12	Welwyn Hatfield	121,996			-0.82%	
13	Guildford	148,020	·		-0.80%	
14 15	Central Bedfordshire	278,937			-0.80% -0.75%	
15 16	Epsom and Ewell Brighton and Hove	79,588 289,229			-0.73% -0.72%	
10 17	Plymouth	264,199			-0.72%	
18	Portsmouth	214,832			-0.70%	
19	York	208,367	206,920		-0.70%	
20	Warwick	140,411	139,488	•	-0.66%	
21	Runnymede	86,889	86,370		-0.60%	
-	Waltham Forest	275,843	274,222	-1,621	-0.59%	
22	Medway	278,542	276,957	-1,585	-0.57%	
-	Brent	328,254	326,427	-1,827	-0.56%	
23	Gravesham	106,808	106,215	-593	-0.56%	
24	Preston	141,801			-0.55%	
25	Fenland	100,182				
26	Poole	151,500			-0.52%	
-	Southwark	313,223			-0.50%	
27 28	Broxtowe Northampton	112,671 225,474			-0.50% -0.43%	
29	Bath and North East Somerset	187,751			-0.43%	
30	Lincoln	97,795			-0.42%	
31	Kirklees	437,047			-0.42%	
32	Luton	216,791			-0.41%	
33	Dartford	105,543	105,117	-426	-0.41%	
34	Worcester	102,338	101,927	-411	-0.40%	
35	Maidstone	166,360	165,719	-641	-0.39%	
36	Stafford	134,155			-0.37%	
-	Islington	232,865			-0.35%	
37	South Gloucestershire	277,623			-0.34%	
-	Barnet	386,083			-0.34%	
38	Richmond upon Thames Calderdale	195,846 209,770			-0.34% -0.34%	
39	Bradford	534,279				
40	Epping Forest	130,321				
41	West Lancashire	113,401	113,061		-0.30%	
42	South Cambridgeshire	156,468				
43	Daventry	81,316				
44	Cheltenham	117,530	117,217	-313	-0.27%	
45	Newcastle-under-Lyme	128,467	128,126	-341	-0.27%	
46	Stockport	290,557	289,821	-736	-0.25%	
47	Reigate and Banstead	145,648	145,284	-364	-0.25%	
48	Rushmoor	96,327			-0.25%	
49	Salford	248,726			-0.24%	
50	Sheffield	575,424			-0.24%	
51 52	Sunderland	277,962	<u>-</u>		-0.24%	
52 52	Wyre Ayloshury Valo	110,261			-0.24%	
53 -	Aylesbury Vale Greenwich	193,113 279,766			-0.22% -0.22%	
- 54	Lichfield	103,061	•			
5 4 55	Ashford	126,151			-0.22% -0.22%	
56	North West Leicestershire	98,644			-0.21%	
57	North Dorset	71,064			-0.21%	
58	Watford	96,773				
59	Hinckley and Bosworth	110,102			-0.20%	
60	Trafford	234,673			-0.20%	
61	Peterborough	197,095				
01						
62	Harborough	90,416	90,251	-165	-0.18%	

Rank (exc London)	Local Authority	Unrevised 2016 MYE	Revised 2016 MYE	Difference (persons)	Difference (%)
64	Great Yarmouth	99,164	98,992	-172	-0.17%
65	Dacorum	152,692	152,445	-247	-0.16%
66	Oldham	232,724	232,349	-375	-0.16%
67	Tandridge	86,665	86,527	-138	-0.16%
68	North Norfolk	103,752	103,587	-165	-0.16%
69	Nottingham	325,282	324,779	-503	-0.15%
70	South Tyneside	149,418	149,194	-224	-0.15%
71	Shepway	111,190	111,024	-166	-0.15%
72	Harlow	85,995	85,867	-128	-0.15%
73	Blaby	97,703	97,562	-141	-0.14%
74	Rossendale	69,886	69,787	-99	-0.14%
-	Sutton	202,220	201,945	-275	-0.14%
75	East Hertfordshire	146,309	146,130	-179	-0.12%
76	Sevenoaks	119,142	119,011	-131	-0.11%
77	South Northamptonshire	89,959			-0.11%
-	Hackney	273,526			-0.11%
78	Gloucester	128,488	•		
79	Bury	188,669			-0.09%
80	, Swale	145,042	•		
81	Leeds	781,743	·		
82	Pendle	90,588	· ·		
83	Tewkesbury	88,589	· ·		-0.08%
84	Kingston upon Hull, City of	260,240	· ·		
85	Sedgemoor	121,436	·		
86	Chorley	114,351	· ·		
87	County Durham	522,143			
88	North Hertfordshire	•			
		132,747 129,635			
89	Eastleigh	•	•		
90	Vale of White Horse	128,738	· · · · · · · · · · · · · · · · · · ·		
91	North Warwickshire	63,229			
92	Kettering	99,002	· ·		
93	Middlesbrough	140,398			
94	Eastbourne	103,054	· · · · · · · · · · · · · · · · · · ·		
95	Broadland	127,455	•		
96	Tameside	223,189			
97	Spelthorne	98,902	·		
98	Rushcliffe	115,204			
99	Burnley	87,522	87,496	-26	-0.03%
100	Sandwell	322,712	322,631	-81	-0.03%
101	Dudley	317,634	317,558	-76	-0.02%
-	Harrow	248,752			
102	Cannock Chase	98,534	98,513	-21	-0.02%
103	Carlisle	108,409	108,388	-21	-0.02%
104	East Dorset	89,093	89,080	-13	-0.01%
105	Derby	256,233	256,203	-30	-0.01%
106	South Staffordshire	111,180	111,173	-7	-0.01%
107	Copeland	69,307	69,306	-1	-0.00%
108	Bromsgrove	96,769	96,770	+1	+0.00%
109	Eden	52,639	52,642	+3	+0.01%
110	Tonbridge and Malling	127,293	127,305	+12	+0.01%
111	Manchester	541,263	541,319	+56	+0.01%
112	Purbeck	46,336	46,341	+5	+0.01%
113	North Lincolnshire	170,786	170,807	+21	+0.01%
114	Cheshire West and Chester	335,680	335,724	+44	+0.01%
115	St. Helens	178,455	178,480	+25	+0.01%
116	South Ribble	110,118	110,136	+18	+0.02%
117	Reading	162,666			+0.02%
118	Castle Point	89,731			
119	Ashfield	124,482			
120	North East Derbyshire	100,423			
121	North Devon	94,615	· · · · · · · · · · · · · · · · · · ·		
	Kensington and Chelsea	156,726	•		
122	Hartlepool	92,817			
123	Forest of Dean	85,385			
123	North Somerset	211,681			
125	East Riding of Yorkshire	337,696			
126	Bedford	168,751			
		•	· ·		
127 128	Rochford	85,670 120,856			
128	Teignbridge	129,856 162,416			
129	Canterbury	162,416			
130	Knowsley	147,915	· ·		
131	Hambleton	90,537			
132	Walsall	278,715	· ·		
133	Chelmsford	174,089			
134	Craven	56,308	•		
135	High Peak	91,662			
136	Ribble Valley	58,826			
137	Breckland	137,032			
138	Torridge	66,977	·		
139	Redcar and Cleveland	135,404	135,496	+92	+0.07%
140	West Oxfordshire	108,674	108,748	+74	+0.07%
141	Tamworth	76,955	77,010	+55	+0.07%
142	Wakefield	336,834	337,094	+260	+0.08%
		•			

Rank (exc London)	Local Authority	Unrevised 2016 MYE	Revised 2016 MYE	Difference (persons)	Difference (%)
143 144	Stroud Warrington	117,381 208,809			
144 145	Rotherham	261,930	•		
146	Chesterfield	104,440			
147	Rochdale	216,165	•		
148	Coventry	352,911	353,215	+304	+0.09%
149	South Derbyshire	100,334	•		
150	South Norfolk	132,837	•		
151 152	Wyre Forest Broxbourne	99,902 96,779	•		
153	Chiltern	95,103	•		
154	Maldon	63,350			
155	Staffordshire Moorlands	98,069	98,176	+107	+0.11%
156	Mid Devon	79,789			
157	Weymouth and Portland	65,371			
158	Uttlesford	86,188	•		
159 160	Herefordshire, County of West Dorset	189,309 101,382			
161	Thanet	140,652	•		
162	Amber Valley	124,645			
163	North Tyneside	203,307	203,575	+268	+0.13%
-	Bexley	244,760	245,095	+335	+0.14%
164	King's Lynn and West Norfolk	151,589			
165	Redditch	84,971	•		
166 167	Stockton-on-Tees	195,681 323,060			
168	Wigan Allerdale	96,956	•		
169	Bolton	283,115			
170	Gosport	85,363	85,492		
171	South Holland	92,387			
172	Crawley	111,375		+171	+0.15%
173	Three Rivers	92,533	•		
174	Braintree	150,999	•		
175 176	Corby Cheshire East	68,187 376,695			
170 177	New Forest	179,236	•		
178	Wychavon	122,943			
179	Hertsmere	103,528	•		
180	Stoke-on-Trent	253,226	253,659	+433	+0.17%
181	Melton	50,878			
182	West Lindsey	93,734			
183	Adur	63,506			
184 185	Bolsover Arun	78,082 156,997			
186	Solihull	211,763			
187	Erewash	114,891			
188	East Staffordshire	116,701	116,937	+236	+0.20%
189	Cherwell	146,338	•		
190	Havant	123,640	•		
191	Fylde	77,990	•		
192 -	Gedling Bromley	116,501 326,889			
193	Basildon	183,378			
194	Boston	67,564	•		
195	Sefton	274,261	274,853	+592	+0.22%
196	East Lindsey	138,443			
-	Enfield	331,395			
197 198	Wellingborough	78,191 119,570			
139	Newark and Sherwood Havering	119,570 252,783			
199	Stevenage	87,081	•		
200	Bracknell Forest	119,447			
201	Huntingdonshire	175,666	176,095	+429	+0.24%
202	Tunbridge Wells	117,069	•		
203	Lewes	101,381	•		
204	Cornwall	553,687		•	
205 206	South Bucks East Devon	69,636 139,908			
207	Barnsley	241,218			
-	Croydon	382,304	•		
208	Derbyshire Dales	71,288			
209	Richmondshire	53,732	53,876		+0.27%
210	West Devon	54,582	•		
211	Oadby and Wigston	55,825			
212	Dover	114,227 157,575			
212	\\\a_a a =:-	1 7 7	158,054		
213	Wealden Wirral	•	211 110	ירחי	111 ******
213 214	Wirral	321,238			
213		321,238 113,297	113,644	+347	+0.31%
213 214 215	Wirral North Kesteven	321,238	113,644 147,540	+347 +451	+0.31% +0.31%
213 214 215 216	Wirral North Kesteven Mid Sussex	321,238 113,297 147,089	113,644 147,540 108,157	+347 +451 +333	+0.31% +0.31% +0.31%
213 214 215 216 217	Wirral North Kesteven Mid Sussex Scarborough	321,238 113,297 147,089 107,824	113,644 147,540 108,157 218,580 1,128,077	+347 +451 +333 +675 +3,508	+0.31% +0.31% +0.31% +0.31% +0.31%

Rank (exc London)	Local Authority	Unrevised 2016 MYE	Revised 2016 MYE	Difference (persons)	Difference (%)
221 222	Selby Halton	86,667 126,903	· ·		
222	Bassetlaw	114,847	•		
224	Doncaster	306,397	•		
225	Shropshire	313,373			
226	Christchurch	49,481	· ·		
227	Isle of Wight	139,798	140,264	+466	+0.33%
228	Leicester	348,343	349,513	+1,170	+0.33%
229	Fareham	115,423	· ·		
230	Surrey Heath	88,387	·		
231	Basingstoke and Deane	174,588			
232	Horsham	138,018	· ·		
233	Slough	147,181	•		
234	Bristol, City of	454,213			
235 236	Torbay Taunton Deane	133,883 115,515	·		
237	St Edmundsbury	112,938			
238	Mansfield	107,435	·		
239	East Cambridgeshire	87,825	· ·		
240	East Northamptonshire	90,999	·		
241	Cotswold	85,756	· ·		
242	North East Lincolnshire	159,144			
243	Telford and Wrekin	172,976			
244	Rother	93,551			+0.44%
245	Southend-on-Sea	179,799	180,606	+807	+0.45%
246	Northumberland	316,002			
-	Ealing	343,196		·	
247	West Somerset	34,306	34,475	+169	+0.49%
248	Brentwood	76,386	76,769	+383	+0.50%
249	South Kesteven	140,193			+0.50%
250	St Albans	146,282			
251	Gateshead	201,592	•		
252	Nuneaton and Bedworth	127,019	· ·		
253	Mendip	112,545			
254	Tendring	142,598	•		
255	South Somerset	165,645			
256	South Lakeland	103,274	· · · · · · · · · · · · · · · · · · ·		
257	Colchester	186,635			
258 259	Wolverhampton Malvern Hills	256,621 76,130	· ·		
260	Waveney	116,514	·		
261	Blackpool	139,195	· ·		
262	Windsor and Maidenhead	148,814			
263	Worthing	108,605	· ·		
264	Liverpool	484,578	·		
265	South Hams	84,306	·		
266	East Hampshire	117,955	·		
267	Test Valley	122,044	122,823	+779	+0.63%
268	Darlington	105,646	106,327	+681	+0.64%
269	Milton Keynes	264,479	266,240	+1,761	+0.66%
270	Waverley	123,768	124,593		
271	Hart	94,250			
-	Redbridge	299,249			
272	Ryedale	53,486	· ·		
273	Mid Suffolk	100,014	·		
274	Hastings	92,236			
275	South Oxfordshire	138,128			
276 277	Wokingham Wiltshire	161,878 488,409			
277	Chichester	118,175			
-	Merton	205,029			
_	Barking and Dagenham	206,460	•		
279	Thurrock	167,025			
280	Babergh	89,498	·		
281	Stratford-on-Avon	122,276			
282	Rutland	38,606	•	•	
283	Winchester	121,965			
284	Blackburn with Darwen	147,049			
285	Isles of Scilly	2,308			
-	Newham	340,978			
286	West Berkshire	156,837			
-	Hammersmith and Fulham	179,654			
287	Mole Valley	86,223			
-	Camden	246,181			
288	Rugby	103,815			
289	Suffolk Coastal	125,955	127,836	+1,881	+1.47%
-	Wandsworth	316,096	321,497	+5,401	+1.68%
290	Woking	99,695	101,421	+1,726	+1.70%
	La accidada	125 000	138,515	+2,607	+1.88%
291	Ipswich	135,908	100,010	-,	. 1.0070
	Harrogate Elmbridge	156,312 132,764	159,768	+3,456	+2.16%

Table 3
Comparison of population change 2011-16 pre and post revision

Rank (exc London)	Local Authority	2011 MYE	Unrevised 2016 MYE	Change 2011-16 unrevised	Change 2011-16 unrevised (%)	Revised 2016 MYE	Change 2011-16 revised	Change 2011-16 revised (%)	Difference (% points)
-	City of London	7,412		+1,989		•			
1	Cambridge	122,725				-			
2	Oxford	150,245							
-	Westminster	219,582		+28,032		•			
3	Haringey Bournemouth	255,540 183,450		+22,911 +14,207		•			
4	Exeter	117,063				·			
5	Forest Heath	60,038				-			
6	Southampton	235,870		+18,405					
-	Lambeth	304,481							
-	Tower Hamlets	256,012	304,854	+48,842	+19.08%	300,943	+44,933	l +17.55%	-1.53%
-	Kingston upon Thames	160,436	176,107	+15,671	+9.77%	173,703	+13,267	7 +8.27%	-1.50%
7	Lancaster	137,823		+5,694		·			
8	Charnwood	165,876							
-	Hounslow	254,927		+16,212		•			
9	Lewisham Newcastle upon Tyne	276,938		+24,929 +17,386		•			
-	Hillingdon	279,092 275,499		+26,972		•			
10	Welwyn Hatfield	110,727				•			
11	Norwich	132,158		+8,883		-			
12	Wycombe	171,958				-			
13	Central Bedfordshire	255,644	•	•		<u>-</u>	•		
14	Guildford	137,580	148,020	+10,440	+7.59%	146,845	+9,265	+6.73%	-0.85%
15	Epsom and Ewell	75,191	79,588	+4,397	+5.85%	78,999	+3,808	+5.06%	-0.78%
16	Brighton and Hove	272,952		+16,277		·			
17	York	197,783		+10,584		-			
18	Portsmouth	205,433							
19	Plymouth	256,589				-			
20	Warwick	137,736		+2,675					
21	Runnymede Waltham Forest	80,501 259,742		+6,388 +16,101					
22	Medway	264,885				•			
-	Brent	312,245							
23	Gravesham	101,766							
24	Fenland	95,461				-			
25	Preston	140,054	141,801	+1,747	+1.25%	141,023	+969	+0.69%	-0.56%
-	Southwark	288,717	313,223	+24,506	+8.49%	311,655	+22,938	3 +7.94%	-0.54%
26	Poole	148,075	151,500	+3,425	+2.31%	150,711	+2,636	5 +1.78%	-0.53%
27	Broxtowe	109,749				-			
28	Northampton	212,492				·			
29	Bath and North East Somerset	175,538				-			
30	Lincoln	93,085		•		-			
31 32	Dartford Luton	97,604 203,641							
33	Kirklees	422,970							
34	Worcester	98,679		•		-			
35	Maidstone	155,764							
-	Islington	206,285				•			
36	Stafford	130,895	134,155	+3,260	+2.49%	133,664	+2,769	+2.12%	-0.38%
-	Barnet	357,538	386,083	+28,545	+7.98%	384,774	+27,236	+7.62%	-0.37%
37	South Gloucestershire	263,417				•	•		
-	Richmond upon Thames	187,527				•			
38	Calderdale	204,170				-			
39	Bradford	523,115				·			
40	Epping Forest	124,880							
41 42	West Lancashire South Cambridgeshire	110,617 149,842				·			
43	Daventry	78,070							
44	Newcastle-under-Lyme	123,878							
45	Cheltenham	115,645		•		·			
46	Reigate and Banstead	138,375							
47	Stockport	283,253	290,557	+7,304	+2.58%	289,821	+6,568	3 +2.32%	-0.26%
48	Salford	234,487	248,726	+14,239	+6.07%	248,121	+13,634	+5.81%	-0.26%
49	Rushmoor	94,354	96,327	+1,973	+2.09%	96,091	+1,737	7 +1.84%	-0.25%
50	Sheffield	551,756	575,424	+23,668	+4.29%	-		+4.04%	
51	Aylesbury Vale	174,880				•			
-	Greenwich	255,483		+24,283		•			
52 53	Wyre	107,692				·			
53 54	Sunderland	275,330							
54 55	Ashford Lichfield	118,405 100 911							
55 56	North West Leicestershire	100,911 93,670				·			
56 57	Watford	90,653		+4,974					
58	North Dorset	69,002		+2,062		·			
59	Hinckley and Bosworth	105,328				-			
60	Trafford	227,091		+7,582					
61	Peterborough	184,457				·			
62	Harborough	85,699							-0.19%
63	Hyndburn	80,549	80,537	-12	-0.01%	80,392	-157	7 -0.19%	-0.18%
64	Great Yarmouth	97,424		+1,740		·			
65	Dacorum	145,298	152,692	+7,394	+5.09%	152,445	+7,147	7 +4.92%	-0.17%

Rank (exc London)	Local Authority	2011 MYE	Unrevised 2016 MYE	Change 2011-16 unrevised	unrevised (%)	2016 MYE	revised	Change 2011-16 revised (%)	(% points)
66 67	Oldham Tandridge	225,157			+3.36% +4.19%	· · · · · · · · · · · · · · · · · · ·			
68	Tandridge Nottingham	83,178 303,899			+4.19% +7.04%	· · · · · · · · · · · · · · · · · · ·			
69	North Norfolk	101,664			+2.05%	·	•		
70	Harlow	82,177			+4.65%				
71	Shepway	108,199			+2.76%	·			
72	South Tyneside	148,164			+0.85%	•			
73	Blaby	94,132	97,703	+3,571	+3.79%	97,562	+3,430	+3.64%	-0.15%
74	Rossendale	68,053	69,886	+1,833	+2.69%	69,787	+1,734	+2.55%	-0.15%
-	Sutton	191,123			+5.81%				
75	East Hertfordshire	138,155			+5.90%	·			
-	Hackney	247,182			+10.66%	•			
76	Sevenoaks	115,351			+3.29%	· · · · · · · · · · · · · · · · · · ·			
77 78	South Northamptonshire Gloucester	85,446 121,921			+5.28% +5.39%	·			
78 79	Swale	136,324			+6.40%				
80	Bury	185,422			+1.75%	· · · · · · · · · · · · · · · · · · ·			
81	Leeds	, 750,683			+4.14%	•			
82	Tewkesbury	82,269	88,589	+6,320	+7.68%	88,518	+6,249	+7.60%	-0.09%
83	Pendle	89,576	90,588	+1,012	+1.13%	90,515	+939	+1.05%	-0.08%
84	Kingston upon Hull, City of	256,123	260,240	+4,117	+1.61%	260,035	+3,912	+1.53%	-0.08%
85	Sedgemoor	114,919			+5.67%	· · · · · · · · · · · · · · · · · · ·			
86	Chorley	107,591			+6.28%	· · · · · · · · · · · · · · · · · · ·			
87	North Hertfordshire	127,494			+4.12%	· · · · · · · · · · · · · · · · · · ·			
88	County Durham	512,994			+1.78%	•			
89 90	Eastleigh Vale of White Horse	125,852 121,891			+3.01% +5.62%	· · · · · · · · · · · · · · · · · · ·			
90 91	Kettering	121,891 93,846			+5.62% +5.49%				
91 92	North Warwickshire	62,089			+5.49% +1.84%				
93	Middlesbrough	138,368			+1.47%				
94	Eastbourne	99,308				· · · · · · · · · · · · · · · · · · ·			
95	Broadland	124,740				· · · · · · · · · · · · · · · · · · ·			
96	Tameside	219,727	223,189	+3,462	+1.58%	223,109	+3,382	+1.54%	-0.04%
97	Spelthorne	95,852	98,902	+3,050	+3.18%	98,869	+3,017	+3.15%	-0.03%
98	Rushcliffe	111,248			+3.56%			+3.52%	-0.03%
99	Burnley	87,032			+0.56%				
100	Sandwell	309,042			+4.42%	· · · · · · · · · · · · · · · · · · ·			
101	Dudley	313,261			+1.40%	•			
102	Harrow Cannock Chase	240,499 97,582			+3.43% +0.98%	·			
102	Carlisle	107,475			+0.87%	•			
104	East Dorset	87,301				· · · · · · · · · · · · · · · · · · ·			
105	Derby	248,943			+2.93%				
106	South Staffordshire	108,318				·			
107	Copeland	70,627	69,307	-1,320	-1.87%	69,306	-1,321	-1.87%	-0.00%
108	Bromsgrove	93,732	96,769	+3,037	+3.24%	96,770	+3,038	+3.24%	+0.00%
109	Eden	52,502			+0.26%				
110	Tonbridge and Malling	121,087			+5.13%				
111	Purbeck	45,184							
112	Manchester	502,902				· · · · · · · · · · · · · · · · · · ·			
113 114	North Lincolnshire Cheshire West and Chester	167,516 329,526							
115	St. Helens	175,405				· · · · · · · · · · · · · · · · · · ·			
116	South Ribble	109,181			+0.86%				
117	Reading	155,339			+4.72%	· · · · · · · · · · · · · · · · · · ·			
118	Castle Point	87,964			+2.01%				+0.02%
119	Ashfield	119,522	124,482	+4,960	+4.15%	124,513	+4,991	+4.18%	+0.03%
120	North East Derbyshire	99,100	100,423	+1,323	+1.34%	100,450	+1,350	+1.36%	+0.03%
-	Kensington and Chelsea	158,251			-0.96%	·			
121	North Devon	93,976			+0.68%	· · · · · · · · · · · · · · · · · · ·			
122	Hartlepool	92,088			+0.79%	•			
123	Forest of Dean	82,200 334,673			+3.87% +0.90%				
124 125	East Riding of Yorkshire North Somerset	334,673 203,091			+0.90%	•			
125	Bedford	203,091 157,840			+4.23% +6.91%				
126	Rochford	83,333			+2.80%	· · · · · · · · · · · · · · · · · · ·			
128	Teignbridge	124,271			+4.49%				
129	Canterbury	150,600							
130	Knowsley	145,903							
131	Hambleton	89,602			+1.04%	· · · · · · · · · · · · · · · · · · ·			
132	Craven	55,459			+1.53%				
133	High Peak	90,982			+0.75%	· · · · · · · · · · · · · · · · · · ·			
134	Walsall	269,524			+3.41%				
135	Chelmsford	168,491							
136	Ribble Valley	57,292				·			
137	Redcar and Cleveland	135,164			+0.18%	•			
138 139	Breckland West Oxfordshire	131,009 105,442			+4.60% +3.07%	· · · · · · · · · · · · · · · · · · ·			
139 140	Torridge	105,442 63,973			+3.07% +4.70%	•			
140 141	Tamworth	76,895			+4.70%				
141	Wakefield	326,433			+3.19%				
143	Stroud	113,074			+3.81%				
•						· · · · · · · · · · · · · · · · · · ·			
144	Warrington	202,709	200.003	+0.100	13.01/0	200.575	10.207	13.03/0	10.0070
	Rotherham	202,709 257,716				•			

Rank (exc London)	Local Authority	2011 MYE	Unrevised 2016 MYE	unrevised		2016 MYE	revised	Change 2011-16 revised (%)	(% points)
147	Rochdale	211,929			+2.00%	216,350			
148 149	South Derbyshire Coventry	94,915 316,915			+5.71% +11.36%	100,421 353,215			
150	South Norfolk	124,495				132,965			
151	Wyre Forest	98,048				100,007			
152	Broxbourne	93,702			+3.28%	96,881			
153	Chiltern	92,652			+2.65%				
154	Staffordshire Moorlands	97,209		+860	+0.88%	98,176		7 +0.99%	+0.11%
155	Maldon	61,720	63,350	+1,630	+2.64%	63,418	+1,698	+2.75%	+0.11%
156	Weymouth and Portland	65,135	65,371	+236	+0.36%	65,447	+312	+0.48%	+0.12%
157	Mid Devon	77,936	79,789	+1,853	+2.38%	79,880	+1,944	+2.49%	+0.12%
158	Herefordshire, County of	183,619	189,309	+5,690	+3.10%	189,532	+5,913	3 +3.22%	+0.12%
159	West Dorset	99,275	101,382	+2,107	+2.12%	101,505	+2,230	+2.25%	+0.12%
160	Uttlesford	80,032	86,188	+6,156	+7.69%	86,289	+6,257	7 +7.82%	
161	Amber Valley	122,521			+1.73%	124,802			
162	Thanet	134,402			+4.65%	140,828			
163	North Tyneside	201,206			+1.04%	203,575			
164	Redditch	84,318			+0.77%	85,088			
165	King's Lynn and West Norfolk	147,936			+2.47%	151,797			
-	Bexley Stackton on Toos	232,774			+5.15%	245,095			
166 167	Stockton-on-Tees	191,824			+2.01%	195,958			
167 168	Wigan	318,122			+1.55% +0.53%				
169	Allerdale Bolton	96,444 277,296			+0.53%	97,099 283,536			
170	Gosport	82,669							
170 171	South Holland	88,390			+4.52%	92,527			
171	Braintree	147,514			+2.36%	151,233			
172	Crawley	107,053				111,546			
173 174	Three Rivers	87,921			+5.25%	92,676			
175	Cheshire East	370,736			+1.61%	377,303	•		
176	New Forest	176,789							
177	Wychavon	117,074							
178	Stoke-on-Trent	248,719	253,226	+4,507	+1.81%	253,659	+4,940	+1.99%	+0.17%
179	Corby	61,607	68,187	+6,580	+10.68%	68,295	+6,688	+10.86%	+0.18%
180	Melton	50,495	50,878	+383	+0.76%	50,967	+472	+0.93%	+0.18%
181	Hertsmere	100,379	103,528	+3,149	+3.14%	103,705	+3,326	+3.31%	+0.18%
182	Adur	61,334	63,506	+2,172	+3.54%	63,621	+2,287	+3.73%	+0.19%
183	Bolsover	76,029	78,082	+2,053	+2.70%	78,225	+2,196	+2.89%	+0.19%
184	West Lindsey	89,352	93,734	+4,382	+4.90%	93,903	+4,551	L +5.09%	+0.19%
185	Arun	149,811				-			
186	Solihull	206,856							
187	Erewash	112,249							
188	East Staffordshire	113,858							
189	Havant	120,783							
190	Cherwell	142,252							
191	Fylde	76,098		·					
192	Gedling Sefton	113,741							
193 194	East Lindsey	273,969 136,683							
-	Bromley	310,554							
195	Basildon	174,971							
196	Boston	64,615				-			
197	Wellingborough	75,637					•		
-	Enfield	313,935							
198	Newark and Sherwood	114,982							
199	Stevenage	84,247				-			
-	Havering	237,927							
200	Bracknell Forest	113,696				·			
201	Tunbridge Wells	115,246				-			
202	Huntingdonshire	170,039							
203	Lewes	97,584				101,631			
204	Cornwall	533,760				555,057		+3.99%	+0.26%
205	South Bucks	67,060							
206	Derbyshire Dales	71,104	71,288	+184	+0.26%	71,477	+373	+0.52%	+0.27%
207	Richmondshire	53,287	53,732	+445	+0.84%	53,876	+589	+1.11%	+0.27%
208	Barnsley	231,865	241,218	+9,353	+4.03%	241,847	+9,982	+4.31%	+0.27%
209	East Devon	133,272	139,908	+6,636	+4.98%	140,271	+6,999	+5.25%	+0.27%
-	Croydon	364,815	382,304	+17,489	+4.79%	383,301	+18,486	5 +5.07%	+0.27%
210	Oadby and Wigston	55,979				<u>-</u>			
211	West Devon	53,655							
212	Barrow-in-Furness	69,056							
213	Wirral	319,837							
214	Scarborough	108,735							
215	Dover	111,718							
216	North Kesteven	108,518				<u>-</u>			
217	Halton	125,722							
218	Wealden	149,415							
219	Mid Sussex	140,188							
220	Swindon	209,709							
221	Bassetlaw	113,003				<u>-</u>			
222	Doncaster	302,468				-			
223	Birmingham	1,074,283							
224	Selby	83,547							
	Shropshire	307,108	313,373	+6,265	+2.04%	314,392	+7,284	+2.37%	+0.33%
225 226	Isle of Wight	138,392				140,264	+1,872	+1.35%	+0.34%

Rank (exc London)	Local Authority	2011 MYE	Unrevised 2016 MYE	Change 2011-16 unrevised	Change 2011-16 unrevised (%)	Revised 2016 MYE	Change 2011-16 revised	Change 2011-16 revised (%)	Difference (% points)
227	Christchurch	47,916						• • •	+0.34%
228	Fareham	111,931	115,423						
229	Leicester	329,627	348,343			•			
230	Surrey Heath	86,378	88,387						
231	Basingstoke and Deane	168,550	174,588						
232	Horsham	131,540	138,018			•			
233	Slough	140,713	147,181	+6,468	+4.60%	147,736	+7,023	+4.99%	+0.39%
234	Torbay	131,193	133,883	+2,690	+2.05%	134,406	+3,213	+2.45%	+0.40%
235	St Edmundsbury	111,443	112,938	+1,495	+1.34%	113,389	+1,946	+1.75%	+0.40%
236	Bristol, City of	428,074	454,213	+26,139	+6.11%	455,966	+27,892	+6.52%	+0.41%
237	Taunton Deane	110,555	115,515	+4,960	+4.49%	115,969	+5,414	+4.90%	+0.41%
238	Mansfield	104,551	107,435			•			
239	North East Lincolnshire	159,735	159,144			•	· ·		
240		84,245	87,825						
	East Cambridgeshire					•			
241	Cotswold	83,180	85,756			•			
242	East Northamptonshire	86,869	90,999			•			
243	Telford and Wrekin	166,831	172,976			•			
244	Northumberland	316,278	316,002	-276	-0.09%	317,444	+1,166	+0.37%	+0.46%
245	Rother	90,729	93,551	+2,822	+3.11%	93,966	+3,237	+3.57%	+0.46%
246	Southend-on-Sea	174,274	179,799	+5,525	+3.17%	180,606	+6,332	+3.63%	+0.46%
-	Ealing	339,314	343,196	+3,882	+1.14%	344,802	+5,488	+1.62%	+0.47%
247	West Somerset	34,588	34,306	-282	-0.82%	34,475	-113	-0.33%	+0.49%
248	Gateshead	200,349	201,592			•			
249	Brentwood	73,841	76,386			•			
250	Nuneaton and Bedworth	125,409	127,019						
251	St Albans	141,248	146,282			•			
252	South Kesteven	134,125	140,193						
253	South Lakeland	103,713	103,274						+0.53%
254	Mendip	109,406	112,545	+3,139	+2.87%	113,131	+3,725	+3.40%	+0.54%
255	South Somerset	162,113	165,645	+3,532	+2.18%	166,526	+4,413	+2.72%	+0.54%
256	Tendring	138,062	142,598	+4,536	+3.29%	143,353	+5,291	+3.83%	+0.55%
257	Blackpool	142,080	139,195	-2,885	-2.03%	139,983	-2,097	-1.48%	+0.55%
258	Wolverhampton	249,852				•			
259	Waveney	115,356				•			
260	Malvern Hills	74,706							
261	Colchester	173,614				•			
262	Windsor and Maidenhead	145,098		· ·		•			
263	Worthing	104,998				•			
264	South Hams	83,563				•			
265	Darlington	105,584	105,646	+62	+0.06%	•		+0.70%	+0.64%
266	East Hampshire	116,010	117,955	+1,945	+1.68%	118,705	+2,695	+2.32%	+0.65%
267	Liverpool	465,656	484,578	+18,922	+4.06%	487,605	+21,949	+4.71%	+0.65%
268	Test Valley	116,698	122,044	+5,346	+4.58%	122,823	+6,125	+5.25%	+0.67%
269	Waverley	121,754	123,768	+2,014	+1.65%	124,593	+2,839	+2.33%	+0.68%
270	Hart	91,662							+0.69%
271	Milton Keynes	249,895							
272	Ryedale	51,893				•			
	•					•			
273	Mid Suffolk	97,076		·		·			
-	Redbridge	281,395	299,249			·			
274	Hastings	90,173	92,236			•			
275	South Oxfordshire	134,961	138,128	+3,167	+2.35%	139,156	+4,195	+3.11%	
276	Wokingham	154,943	161,878	+6,935	+4.48%	163,087	+8,144	+5.26%	+0.78%
277	Wiltshire	474,319	488,409	+14,090	+2.97%	492,240	+17,921	+3.78%	+0.81%
278	Chichester	113,995	118,175	+4,180	+3.67%	119,125	+5,130	+4.50%	+0.83%
-	Merton	200,543	205,029	+4,486	+2.24%	206,706	+6,163	+3.07%	+0.84%
279	Babergh	87,901	89,498			·			
280	Stratford-on-Avon	120,824				•			
281	Thurrock	158,268							
282	Rutland	37,581		<u>-</u>		•			
202									
-	Barking and Dagenham	187,029	206,460	·		·			
283	Blackburn with Darwen	147,657	147,049			•			
284	Winchester	116,820							
285	Isles of Scilly	2,224	2,308			•			
286	West Berkshire	154,148	156,837	+2,689	+1.74%	158,576	+4,428	+2.87%	+1.13%
-	Newham	310,460	340,978	+30,518	+9.83%	344,533	+34,073	+10.98%	+1.15%
-	Hammersmith and Fulham	182,445	179,654			181,783	-662	-0.36%	+1.17%
287	Mole Valley	85,637	86,223			•			
-	Camden	220,087	246,181						
288	Rugby	100,496							
289	Suffolk Coastal	124,590				•			
						•			
290	Woking	99,493	99,695			·			
-	Wandsworth	307,710	316,096						+1.76%
291	lpswich	133,729	135,908			•			
292	Harrogate	158,683	156,312						
293	Elmbridge	131,428	132,764	+1,336	+1.02%	136,085	+4,657	+3.54%	+2.53%

Table 4
Comparison of 2011 MYE excluding and including UPC

Rank		2011 MYE	2011 MYE	UPC
(exc London)	Local Authority	exc. UPC	inc. UPC	(persons)
1	Leeds	790,681	750,683	-39,998
-	Westminster	251,588	•	-32,006
2	Camden Coventry	241,399 331,865	220,087 316,915	-21,312 -14,950
-	Kingston upon Thames	175,279		-14,843
-	Merton	214,752	•	-14,209
-	Southwark	302,352	288,717	-13,635
3	Cornwall	544,670	•	-10,910
4	Wokingham	165,615	154,943	-10,672
5	Tendring	148,604	138,062	-10,542
6 7	North Somerset Welwyn Hatfield	212,125 119,117	•	-9,034 -8,390
-	Bromley	318,898	310,554	-8,344
-	Sutton	199,428		-8,305
8	Lancaster	145,708	137,823	-7,885
9	Newcastle upon Tyne	286,875		-7,783
10	Bristol, City of	435,578	·	-7,504
- 11	Sunderland Richmond upon Thames	282,820 194,756		-7,490 -7,229
12	Central Bedfordshire	262,828	•	-7,184
13	Guildford	144,754		-7,174
-	Barnet	364,397		-6,859
14	Bedford	164,532	157,840	-6,692
-	Kensington and Chelsea	164,750	158,251	-6,499
15	East Lindsey	142,942		-6,259
16 17	Runnymede East Riding of Yorkshire	86,653 340,656	80,501 334,673	-6,152 -5,983
18	Charnwood	171,826		-5,950
19	Aylesbury Vale	180,735	174,880	-5,855
-	Islington	211,976	206,285	-5,691
-	Tower Hamlets	261,524	256,012	-5,512
20	South Gloucestershire	268,828	•	
21	Bracknell Forest	118,842		-5,146
22 23	Kingston upon Hull, City of East Cambridgeshire	261,135 89,001		-5,012 -4,756
23 24	Wakefield	331,009		-4,736 -4,576
25	Bath and North East Somerset	180,038		-4,500
26	Middlesbrough	142,643	•	
27	Canterbury	154,717	150,600	-4,117
28	Colchester	177,695		-4,081
29	Arun	153,862		-4,051
30 31	St. Helens South Northamptonshire	179,425 89,448		-4,020 -4,002
-	City of London	11,395	·	
32	Wyre	111,597		-3,905
33	South Tyneside	151,857	148,164	-3,693
34	Knowsley	149,542	•	-3,639
35	Southampton	239,471	235,870	-3,601
36 27	Nottingham	307,468	•	-3,569
37 38	Stockport Oadby and Wigston	286,821 59,362	283,253 55,979	-3,568 -3,383
-	Hillingdon	278,783		-3,284
39	Teignbridge	127,225		-2,954
40	Exeter	119,961		-2,898
41	Torbay	134,034	•	-2,841
42	North Norfolk	104,471	101,664	-2,807
43	Northampton	215,278		-2,786
- 44	Barking and Dagenham Newcastle-under-Lyme	189,704 126,481	187,029 123,878	-2,675 -2,603
45	Norwich	134,757	132,158	-2,599
46	York	200,351	197,783	-2,568
47	Broxtowe	112,290		-2,541
48	Redcar and Cleveland	137,657		
49	New Forest	179,206		-2,417
50 E1	Forest Heath	62,453		-2,415 2,204
51 52	Waveney Torridge	117,750 66,355		-2,394 -2,382
53	Cherwell	144,473		
54	Derby	251,139	•	-2,196
55	Fareham	114,092		-2,161
56	Sefton	276,073		-2,104
57	Wychavon	119,136		-2,062
58	High Peak	93,018		
59 60	Rushcliffe	113,263		-2,015 1 885
60 61	Stockton-on-Tees Isle of Wight	193,709 140,242		
62	West Lancashire	112,406		-1,789
63	East Hertfordshire	139,884	•	-1,729
64	Mendip	111,083	109,406	-1,677

66 Crawley 108,688 107,053 67 Three Bivers 89,530 87,921 68 Epping Forest 126,486 124,880 69 Lewes 99,155 97,584 70 Breckland 132,7570 131,009 71 Pendle 91,116 89,575 72 Ryedale 53,398 51,893 73 Boston 66,086 64,615 74 Hart 99,083 91,662 75 Castle Point 89,342 87,964 76 Stratford-on-Avon 122,196 120,824 77 Wellingborough 77,002 75,637 78 Forest of Dean 83,559 82,000 79 Swale 137,637 136,334 80 Herefordshire, County of 184,889 183,619 81 Bury 186,689 185,422 82 Hymdburn 81,812 80,549 83 Horisham 132,793 131,540 84 East Dorset 88,550 87,301 - Hevering 239,153 237,927 86 South takeland 104,937 103,713 87 Ribble Valley 58,506 57,292 88 Tewkesbury 83,480 82,269 90 Maldon 62,898 10,720 91 South Kastewen 135,277 134,125 91 South Kastewen 135,277 134,125 92 Fydde 77,245 76,098 93 Warrington 20,801 202,709 94 West Somerset 36,652 34,888 95 Sedgemor 115,978 114,919 96 Vale of White Horse 120,935 114,919 97 South Cambridgeshire 150,809 149,842 100 Cotswold 88,099 143,837 101 Register and Basted 139,999 138,375 102 South Cambridgeshire 150,809 149,842 103 Ruthard 89,244 88,390 104 Register and Banstead 139,209 138,375 105 Gedding 145,611 133,777 115 South Kastewen 135,771 134,125 105 South Cambridgeshire 150,809 149,842 106 Blaby 94,828 94,132 107 Salford 235,181 108 Fenhand 96,084 95,661 101 Taunton Deane 111,423 110,555 110 Cotswold 88,085 83,180 110 Taunton Deane 110,575 110 Wyer Forest 98,556 88,094 110 Register and Banstead 139,209 138,375 110 Gedding 145,611 13,741 110 Wyer Forest 98,556 88,094 111 West Devon 133,784 133,777 112 Haster Power 133,786 112 Wasterley 122,319 121,754 113 Windsor and Maidenhead 145,618 135,091 114 Past Devon 133,784 133,777 115 Chichester 19,596 99,898 99,424 117 West Devon 133,784 133,777 116 Adur 61,838 61,334 117 West Devon 133,786 115,801 115,351 118 Basingstoke and Deane 169,023 168,550 119 South Burbine 195,098 99,998 99,424 120 Sevenoaks 115,100 113,371 121 Wasterley 122,319 99,134 132 Wasterley 122,319 99,91,424 133 Mindsor and Maidenhead 135,613 130,008 137,736 131 South Dertyshir	Rank (exc London)	Local Authority	2011 MYE exc. UPC	2011 MYE inc. UPC	UPC (persons)
67 Three Rivers 68 Epping Forest 126.486 124.880 69 Lewes 99.155 97.584 70 Breckland 132,570 131,009 71 Pendie 91,116 89,576 72 Ryedale 53.398 51,893 73 Boston 66,086 64,615 74 Hart 93,083 91,662 75 Castle Point 77 Wellingborough 77,002 75,637 78 Forest of Dean 83,342 87,964 78 Wellingborough 77,002 75,637 78 Forest of Dean 83,559 82,200 80 Herefordshire, County of 184,889 183,619 81 Bury 186,689 185,422 82 Hyndburn 81,812 80,649 83 Horsham 132,793 131,540 84 East Dorset 88,550 87,301 85 Portsmouth 206,671 205,433 87 Ribble Valley 88 Fourth of Sulley 88 South Liskeland 104,937 103,713 86 South Liskeland 104,937 103,713 87 Ribble Valley 88 Tewkesbury 88 Javenty 99 Daventry 90 Maldon 62,898 61,720 90 Maldon 62,898 61,720 91 South Kesteven 135,277 134,125 76,098 93 Warrington 203,801 202,709 94 West Somerset 35,652 34,588 95 Sedgemoor 115,978 114,919 97 South Cambridgeshire 100,802 14,188 100 Eventson 100 Cotswold 100 Ribble Valley 100 Roll of Sulley 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,982 115,978 114,919 115,978 114,919 115,978 114,919 115,978 114,978 115,978 115,978 115,978 115,978 116,978 117 117 118,978 118,978 118,978 118,978 118,978 118,978 118,978 118,978 118,978 118,	65				
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Havering	84	East Dorset	88,550	87,301	-1,249
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87 Ribble Valley 58,506 57,292 88 Tewkesbury 83,480 82,269 89 Daventry 79,255 78,070 90 Maldon 62,898 61,720 91 South Kesteven 135,277 134,125 92 Fylde 77,245 76,098 93 Warrington 203,801 202,709 94 West Somerset 35,652 34,588 95 Sedgemoor 115,978 114,919 96 Vale of White Horse 122,925 121,891 97 South Cambridgeshire 150,809 149,842 98 Thurrock 159,214 158,268 99 Hinckley and Bosworth 106,266 105,328 100 Cotswold 84,868 83,180 101 Taunton Deane 111,423 110,555 102 South Holland 89,254 88,390 103 Rutland 38,427 37,581 104	-	•			
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115 Chichester 114,507 113,995 116 Adur 61,838 61,334 117 West Devon 54,147 53,655 118 Basingstoke and Deane 169,023 168,550 119 South Bucks 67,524 67,060 120 Sevenoaks 115,801 115,351 121 Malvern Hills 75,140 74,706 122 Huntingdonshire 170,424 170,039 123 West Lindsey 89,730 89,352 124 South Ribble 109,547 109,181 125 North Warwickshire 62,440 62,089 126 Selby 83,897 83,547 127 Tandridge 83,522 83,178 128 Tonbridge and Malling 121,380 121,087 129 Warwick 138,008 137,736 130 Elmbridge 131,692 131,428 131 South Derbyshire 95,132 94,915 132 West Berkshire 154,358 154,148 133 <t< td=""><td>113</td><td>Windsor and Maidenhead</td><td>145,618</td><td>145,098</td><td>-520</td></t<>	113	Windsor and Maidenhead	145,618	145,098	-520
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142 Amper valley 122,518 122,521	142	Amber Valley	122,518		
- Bexley 232,761 232,774		·			
143 Tamworth 76,880 76,895	143		76,880	76,895	+15
144 Chorley 107,536 107,591	144	Chorley	107,536	107,591	+55

Rank (exc London)	Local Authority	2011 MYE exc. UPC	2011 MYE inc. UPC	UPC (persons)
145	Rossendale	67,993		
146	Hertsmere	100,310		
147	Rother	90,652	•	
148	Craven	55,372		
149 150	Erewash North Kesteven	112,149 108,409		
150 151	Christchurch	47,761	•	
151	Melton	50,305	•	
153	Rochford	83,129		
154	Ashford	118,154		
155	Purbeck	44,927	•	
156	Stroud	112,812	•	
157	Isles of Scilly	1,918	•	
-	Redbridge	281,065		
158	Harborough	85,362	•	
159	Cheshire West and Chester	329,180		
160	Tameside	219,380		
161	Hartlepool	91,712	92,088	+376
162	North East Derbyshire	98,720	99,100	+380
163	Blackpool	141,699		+381
164	South Hams	83,167	83,563	+396
165	Mole Valley	85,220	85,637	+417
166	Calderdale	203,730	204,170	+440
167	Plymouth	256,120	256,589	+469
168	Broadland	124,256	124,740	+484
169	Preston	139,559	140,054	+495
170	Thanet	133,883	134,402	+519
171	Lichfield	100,388	100,911	+523
172	Harlow	81,651	82,177	+526
173	Brentwood	73,309	73,841	+532
174	Gravesham	101,195	101,766	+571
175	Winchester	116,216	116,820	+604
176	Telford and Wrekin	166,216	166,831	+615
177	Bolsover	75,378	76,029	+651
178	East Northamptonshire	86,203		
179	Harrogate	157,923		
-	Enfield	313,146		
180	Derbyshire Dales	70,305		
181	Ashfield	118,717		
182	Copeland	69,785		
183	Uttlesford	79,183	•	
184	Spelthorne	94,987		
185	South Norfolk	123,625		
186	Burnley	86,100		
187	Cheltenham	114,672		
188 189	King's Lynn and West Norfolk Mid Devon	146,949	•	
190		76,938 103,971		
190	Worthing Braintree	146,484		
191	Chelmsford	167,444		
193	Maidstone	154,692		
194	East Hampshire	114,903		
195	Epsom and Ewell	74,082	•	
196	Babergh	86,780		
197	Staffordshire Moorlands	96,078		
198	Carlisle	106,336		
199	Chiltern	91,432		
200	Surrey Heath	85,151	•	
201	Test Valley	115,470		
202	South Staffordshire	107,070	•	•
203	Scarborough	107,475	108,735	
204	Rotherham	256,419	•	•
205	Medway	263,572		•
206	Mid Suffolk	95,747		
207	Kettering	92,491	•	•
208	Nuneaton and Bedworth	123,981	•	•
209	Weymouth and Portland	63,686		•
210	Sheffield	550,286	•	
211	Dartford	96,120		
212	Allerdale	94,945	•	·
213	Eastleigh	124,331	•	•
214	North Devon	92,450	•	
215	North East Lincolnshire	158,147		
216	Gosport	81,029		
217	Dacorum	143,654		
218	Eastbourne	97,648	•	·
219	Lincoln	91,421	•	
220	Gloucester	120,225	•	
	South Oxfordshire	133,257		
221		/		
221 222	Cheshire East	368,991	370,736	+1,745
	Cheshire East North West Leicestershire	368,991 91,874	•	•
222		•	93,670	+1,796

(exc London)	Local Authority	2011 MYE exc. UPC	2011 MYE inc. UPC	UPC (persons)
226	Barnsley	230,037	231,865	•
227	West Dorset	97,318	99,275	
228	Hambleton	87,645	89,602	+1,957
229	Broxbourne	91,689	93,702	
230	Cannock Chase	95,449	97,582	·
231	Peterborough	182,312	184,457	· ·
232	Hastings	88,014	90,173	<u>-</u>
233	Stevenage	82,052	84,247	+2,195
234	Corby	59,366	61,607	+2,241
235 236	Rugby St Albans	98,239	100,496	
236	North Dorset	138,967 66,720	141,248 69,002	•
237	Basildon	172,688	174,971	•
239	Chesterfield	101,480	103,788	•
239	Rushmoor	91,741	94,354	
240	Wealden	146,744	149,415	•
241	Oldham	222,333	225,157	+2,824
242	Worcester	95,744		
243	Poole	144,987	148,075	+3,088
244	Dover	108,565	111,718	
-	Harrow	237,300	240,499	+3,199
246	Mansfield	101,340	104,551	+3,211
246	Havant	117,510	120,783	+3,211
247	North Lincolnshire	164,199	167,516	
248		•	•	·
249 250	Richmondshire Oxford	49,923 146,746	53,287 150,245	+3,364 +3,499
250 251	County Durham	•	512,994	
	Hounslow	509,417	•	•
-		251,238	254,927	+3,689
252 253	Stoke-on-Trent Stafford	245,019	248,719 130,895	+3,700
		127,089	•	·
254	Northumberland	312,435	316,278	
255	Redditch	80,469	84,318	
256	Woking	95,350	•	·
257	Darlington Turn bridge Welle	101,239	105,584	
258	Tunbridge Wells	110,789	115,246	
259	Blackburn with Darwen	142,841		
-	Lambeth	299,651	304,481	•
260	Rochdale	206,991	211,929	
261	Bolton	272,300		
262	Dudley Mid Sussey	308,218	313,261	
263	Mid Sussex	134,862	140,188	
264	Wycombe	166,476	171,958	
265	Halton	120,025	125,722	
266	Milton Keynes	244,089		
267	Swindon	203,901		
268	lpswich	127,709	133,729	
269	Shepway	102,085	108,199	
270	Watford	84,283	90,653	
271	St Edmundsbury	104,816		· · · · · · · · · · · · · · · · · · ·
272	Wigan	311,390		
273	Slough	133,835	140,713	
274	Wolverhampton	242,967	249,852	
-	Hammersmith and Fulham	175,141	182,445	
275	Gateshead	192,876	200,349	<u>-</u>
276	Sandwell	301,223	309,042	
277	Trafford	219,213		
-	Haringey	247,284	255,540	
-	Wandsworth	299,077	307,710	
278	Wiltshire	465,406	474,319	
279	Reading	146,012	155,339	
-	Ealing	329,942	339,314	
280	Walsall	260,152	269,524	
281	Wirral	310,449	319,837	·
282	Shropshire	297,573		·
283	Doncaster	292,729	•	· ·
284	Southend-on-Sea	164,469	174,274	+9,805
-	Croydon	354,805	364,815	+10,010
285	Kirklees	412,041	422,970	+10,929
286	Bradford	511,555	523,115	+11,560
287	Bournemouth	171,841	183,450	+11,609
288	Brighton and Hove	260,879	272,952	+12,073
200	Cambridge	107,923	122,725	+14,802
289	Leicester	313,570		
289 290	Waltham Forest	242,755		
		230,170	247,182	
	Hackney		,	•
	Hackney Greenwich	237,792	255,483	+17,691
	•			
290 - - -	Greenwich	237,792		+18,580
290 - - - 291	Greenwich Manchester	237,792 484,322	502,902 465,656	+18,580 +20,596
290 - - - 291	Greenwich Manchester Liverpool	237,792 484,322 445,060	502,902 465,656	+18,580 +20,596 +21,907

Table 5
Comparison of 2011 MYE excluding and including UPC with % change

Rank (exc London)	Local Authority	2011 MYE exc. UPC	2011 MYE inc. UPC	UPC UPC (persons) (%)		
-	City of London	11,395			-53.74%	
-	Westminster	251,588	219,582	-32,006	-14.58%	
-	Camden	241,399			-9.68%	
-	Kingston upon Thames	175,279		•	-9.25%	
1 2	Runnymede Tendring	86,653 148,604	•	•	-7.64% -7.64%	
3	Welwyn Hatfield	119,117	•	•	-7.58%	
-	Merton	214,752		-14,209	-7.09%	
4	Wokingham	165,615			-6.89%	
5	Oadby and Wigston	59,362			-6.04%	
6	Lancaster	145,708	•	-7,885	-5.72%	
7	East Cambridgeshire	89,001	•	•	-5.65%	
8 9	Leeds Guildford	790,681 144,754	•	•	-5.33% -5.21%	
-	Southwark	302,352			-4.72%	
10	Coventry	331,865	•		-4.72%	
11	South Northamptonshire	89,448	85,446	-4,002	-4.68%	
12	East Lindsey	142,942	•	•	-4.58%	
13	Bracknell Forest	118,842			-4.53%	
14	North Somerset Sutton	212,125	·	•	-4.45% -4.35%	
- 15	Bedford	199,428 164,532			-4.24%	
-	Kensington and Chelsea	164,750			-4.11%	
16	Forest Heath	62,453		·	-4.02%	
-	Richmond upon Thames	194,756	187,527	-7,229	-3.85%	
17	Torridge	66,355			-3.72%	
18	Wyre	111,597			-3.63%	
19	Charnwood	171,826	•	•	-3.59%	
20 21	Aylesbury Vale Middlesbrough	180,735 142,643			-3.35% -3.09%	
22	West Somerset	35,652	•	•		
23	Ryedale	53,398				
24	Central Bedfordshire	262,828				
25	Newcastle upon Tyne	286,875	279,092	-7,783	-2.79%	
26	North Norfolk	104,471			-2.76%	
-	Islington	211,976				
27 28	Canterbury Sunderland	154,717 282,820			-2.73% -2.72%	
29	Arun	153,862	•			
-	Bromley	318,898			-2.69%	
30	Bath and North East Somerset	180,038				
31	Knowsley	149,542	145,903	-3,639	-2.49%	
32	South Tyneside	151,857			-2.49%	
33	Exeter	119,961	•			
34 35	Barrow-in-Furness Teignbridge	70,725 127,225				
36	Colchester	177,695			-2.35%	
37	Broxtowe	112,290				
38	St. Helens	179,425	175,405	-4,020	-2.29%	
39	Boston	66,086	64,615	-1,471	-2.28%	
40	Rutland	38,427				
41	High Peak	93,018			-2.24%	
42	Torbay Tower Hamlets	134,034 261,524				
43	Ribble Valley	58,506	•	•		
44	Newcastle-under-Lyme	126,481				
45	Waveney	117,750				
46	South Gloucestershire	268,828	263,417	-5,411	-2.05%	
47	Cornwall	544,670	533,760	-10,910	-2.04%	
48	Norwich	134,757			-1.97%	
49	Kingston upon Hull, City of	261,135			-1.96%	
50	Fareham Barnet	114,092 364,397			-1.93% -1.92%	
51	Maldon	62,898				
52	Redcar and Cleveland	137,657				
53	Three Rivers	89,530				
54	Rushcliffe	113,263				
55	Wellingborough	77,002				
56	East Riding of Yorkshire	340,656				
57 58	Wychavon Bristol City of	119,136	•	•		
58	Bristol, City of Pendle	435,578 91,116	•	•		
E0.		91,116		•		
59 60		83 550	87 700		1.00/0	
60	Forest of Dean	83,559 112,406				
		83,559 112,406 99,155	110,617	-1,789	-1.62%	
60 61	Forest of Dean West Lancashire	112,406	110,617 97,584	-1,789 -1,571	-1.62% -1.61%	
60 61 62 63 64	Forest of Dean West Lancashire Lewes Hyndburn Castle Point	112,406 99,155 81,812 89,342	110,617 97,584 80,549 87,964	-1,789 -1,571 -1,263 -1,378	-1.62% -1.61% -1.57% -1.57%	
60 61 62 63	Forest of Dean West Lancashire Lewes Hyndburn	112,406 99,155 81,812	110,617 97,584 80,549 87,964 142,252	-1,789 -1,571 -1,263 -1,378 -2,221	-1.62% -1.61% -1.57% -1.57% -1.56%	

Rank (exc London)	Local Authority	2011 MYE exc. UPC	2011 MYE inc. UPC	UPC (persons)	UPC (%)
67	Mendip	111,083		-	
68	Crawley	108,688	107,053	-1,635	-1.53%
69	Southampton	239,471	235,870	-3,601	-1.53%
70	Daventry	79,255		-1,185	-1.52%
71	Fylde	77,245			
72	Tewkesbury	83,480			
73	East Dorset	88,550			
-	Barking and Dagenham	189,704	·	-2,675	
74	Wakefield	331,009			
75 76	New Forest	179,206			
76 77	Isle of Wight Northampton	140,242 215,278			
7 <i>7</i> 78	York	200,351	· ·		
78 79	Epping Forest	126,486			
80	Stockport	286,821	· ·	-3,568	
81	East Hertfordshire	139,884			
-	Hillingdon	278,783		-3,284	
82	Breckland	132,570		-1,561	
83	South Lakeland	104,937	103,713	-1,224	-1.18%
84	Nottingham	307,468	303,899	-3,569	-1.17%
85	Stratford-on-Avon	122,196	120,824	-1,372	-1.14%
86	Cotswold	84,085	83,180	-905	-1.09%
87	Stockton-on-Tees	193,709	191,824	-1,885	-0.98%
88	South Holland	89,254			
89	Swale	137,637			
90	Horsham	132,793			
91	Sedgemoor	115,978		-1,059	
92	West Devon	54,147	-	-492	
93	Hinckley and Bosworth	106,266		-938	
94	Derby	251,139			
95 06	South Kesteven	135,277			
96 07	Vale of White Horse	122,925			
97 08	Adur	61,838	· ·		
98 99	Taunton Deane Sefton	111,423 276,073			
100	Blaby	94,828	<u>-</u>		
101	South Bucks	67,524	•		
102	Herefordshire, County of	184,889	-		
103	Bury	186,689			
104	Gedling	114,501			
105	Fenland	96,084			
106	South Cambridgeshire	150,809	· ·		
107	Wyre Forest	98,656	98,048	-608	-0.62%
108	Reigate and Banstead	139,209	138,375	-834	-0.60%
109	Portsmouth	206,671	205,433	-1,238	-0.60%
110	Thurrock	159,214	158,268	-946	-0.60%
111	Malvern Hills	75,140	74,706	-434	-0.58%
112	North Warwickshire	62,440	· ·		
113	West Oxfordshire	106,014			
114	Warrington	203,801			
-	Havering	239,153			
115	Suffolk Coastal	125,210			
116	Waverley Chichester	122,319 114,507			
117 118	West Lindsey	89,730	· ·		
119	Selby	83,897			
120	Tandridge	83,522			
120	Sevenoaks	115,801			
121	East Devon	133,784	-		
123	Windsor and Maidenhead	145,618			
124	South Ribble	109,547			
125	Salford	235,183	•		
126	Basingstoke and Deane	169,023			
127	Tonbridge and Malling	121,380			
128	South Derbyshire	95,132	94,915	-217	-0.23%
-	Lewisham	277,570	276,938	-632	-0.23%
129	Huntingdonshire	170,424			
130	Elmbridge	131,692			
131	Warwick	138,008			
132	Bromsgrove	93,913			
133	Great Yarmouth	97,599			
134	North Hertfordshire	127,683			
135	Bassetlaw	113,165			
136	West Berkshire	154,358			
137	Newark and Sherwood	115,116			
138	South Somerset	162,220			
120	Luton Solihull	203,763 206,952			
139 140	JUIIIIUII	206,952	•		
140	Amher Valley	122 540	177 574		171711111
140 141	Amber Valley	122,518 52 500			
140 141 142	Eden	52,500	52,502	+2	+0.00%
140 141			52,502 232,774	+2 +13	+0.00% +0.01%

Rank (exc London)	Local Authority	2011 MYE exc. UPC	2011 MYE inc. UPC	UPC (persons)	UPC (%)
145	Hertsmere	100,310			
146	Rother	90,652	90,729	+77	+0.08%
147	Rossendale	67,993	•		
148	Erewash	112,149	•		
149 150	North Kesteven Cheshire West and Chester	108,409 329,180	•		
-	Redbridge	281,065			
151	Craven	55,372	•		
152	Tameside	219,380	•		
153	Plymouth	256,120	•		
154	Ashford	118,154	118,405	+251	+0.21%
155	Calderdale	203,730	204,170	+440	+0.22%
156	Stroud	112,812	•		
157	Rochford	83,129	·		
-	Enfield	313,146			
158 159	Sheffield Blackpool	550,286 141,699			
160	Christchurch	47,761			
161	Preston	139,559	•		
162	Telford and Wrekin	166,216			
163	Melton	50,305	•		
164	North East Derbyshire	98,720	99,100	+380	+0.38%
165	Thanet	133,883	134,402	+519	+0.39%
166	Broadland	124,256			
167	Harborough	85,362			
168	Hartlepool	91,712	•		
169	Cheshire East	368,991			
170 171	South Hams	83,167 157,923	•		
171	Harrogate Mole Valley	85,220	•		
173	Medway	263,572			
174	Rotherham	256,419	•		
175	Winchester	116,216			
176	Lichfield	100,388	100,911	+523	+0.52%
177	Gravesham	101,195	101,766	+571	+0.56%
178	Purbeck	44,927	•		
179	Chelmsford	167,444	•		
180	Harlow	81,651	•		
181 182	King's Lynn and West Norfolk Ashfield	146,949 118,717	•		
183	Maidstone	154,692			
184	County Durham	509,417	•		
185	Braintree	146,484			
186	South Norfolk	123,625	•		
187	Brentwood	73,309	73,841	+532	+0.72%
188	East Northamptonshire	86,203	86,869	+666	+0.77%
189	Barnsley	230,037			
190	Cheltenham	114,672	•		
191	Bolsover	75,378			
192	North Tyneside	199,402	•		
193 194	Spelthorne East Hampshire	94,987 114,903	•		
195	Worthing	103,971	•		
196	North East Lincolnshire	158,147			
197	Test Valley	115,470			
198	Carlisle	106,336			
199	Uttlesford	79,183	80,032	+849	+1.06%
200	Burnley	86,100	87,032	+932	+1.07%
201	Derbyshire Dales	70,305			
202	Dacorum	143,654	•		
203	Nuneaton and Bedworth	123,981	•		
204 205	South Staffordshire	107,070 107,475			
205	Scarborough Peterborough	182,312	•		
200	Staffordshire Moorlands	96,078	•		
208	Copeland	69,785	•	•	
209	Eastleigh	124,331			
210	Northumberland	312,435			
211	Oldham	222,333			
212	South Oxfordshire	133,257	134,961	+1,704	+1.26%
213	Babergh	86,780	•		
214	Mid Devon	76,938	•		
215	Basildon	172,688	•		
216	Chiltern	91,432	•		
-	Harrow	237,300			
217	Mid Suffolk	95,747	•		
218 219	Gloucester Surrey Heath	120,225 85,151			
219	Kettering	92,491			
-	Hounslow	251,238			
221	Epsom and Ewell	74,082		•	
222	Stoke-on-Trent	245,019			
223	Dartford	96,120	•		

Rank (exc London)	Local Authority	2011 MYE exc. UPC	2011 MYE inc. UPC	UPC (persons)	UPC (%)	
224	Allerdale	94,945		·	+1.55%	
- 225	Lambeth East Staffordshire	299,651 112,040				
225	Dudley	308,218				
227	St Albans	138,967				
228	North Devon	92,450	·			
229	Eastbourne	97,648	•			
230	Lincoln	91,421	·			
231 232	Wealden Bolton	146,744 272,300	·			
233	Wiltshire	465,406	·			
234	North West Leicestershire	91,874	·			
235	West Dorset	97,318	99,275	+1,957	+1.97%	
236	North Lincolnshire	164,199	·			
237	Gosport	81,029	·			
238 239	Poole Wigan	144,987 311,390	·			
240	Broxbourne	91,689				
241	Hambleton	87,645	·	•		
242	Cannock Chase	95,449	97,582	+2,133	+2.19%	
243	Bradford	511,555	·			
244	Chesterfield	101,480	·			
245 246	Weymouth and Portland Rugby	63,686 98,239	·			
247	Birmingham	1,049,365	·			
248	Milton Keynes	244,089				
249	Oxford	146,746	150,245	+3,499	+2.33%	
250	Rochdale	206,991	·			
251	Hastings	88,014	·			
252 253	Sandwell Kirklees	301,223 412,041				
253 254	Stevenage	412,041 82,052	·	•		
255	Havant	117,510	·			
-	Croydon	354,805				
256	Wolverhampton	242,967	249,852	+6,885	+2.76%	
-	Ealing	329,942				
257	Rushmoor	91,741	·			
258 -	Swindon Wandsworth	203,901 299,077				
259	Dover	108,565				
260	Stafford	127,089				
261	Wirral	310,449	319,837	+9,388	+2.94%	
262	Worcester	95,744	·	•		
263	Mansfield	101,340				
264 265	Shropshire Wycombe	297,573 166,476				
266	Doncaster	292,729	·	•		
-	Haringey	247,284				
267	Blackburn with Darwen	142,841	147,657	+4,816	+3.26%	
268	North Dorset	66,720	·			
269	Trafford	219,213				
270 271	Walsall Corby	260,152 59,366		•		
271	Manchester	484,322				
273	Gateshead	192,876	·	•		
274	Mid Sussex	134,862				
275	Tunbridge Wells	110,789	115,246	+4,457	+3.87%	
-	Hammersmith and Fulham	175,141				
276	Darlington	101,239				
277 278	Woking Liverpool	95,350 445,060	·			
279	Brighton and Hove	260,879	•	•		
280	Ipswich	127,709				
281	Halton	120,025	125,722	+5,697	+4.53%	
282	Redditch	80,469	·			
283	Leicester	313,570				
284	Slough	133,835				
285 286	Southend-on-Sea Shepway	164,469 102,085				
287	St Edmundsbury	104,816	·			
288	Reading	146,012				
289	Richmondshire	49,923				
290	Bournemouth	171,841				
-	Waltham Forest	242,755				
-	Hackney	230,170				
201	Greenwich Watford	237,792				
291	Newham	84,283 288,553	•	•		
_	. TC TT I GITT					
-	Brent	284.439	312.245	+27.806	+8.91%	
- - 292	Brent Cambridge	284,439 107,923				

Table 6
Comparison of population change 2001-11 excluding and including UPC

Rank (exc London)	Local Authority	2001 MYE	2011 MYE exc. UPC	exc. UPC	Change 2001-11 exc. UPC (%)	inc. UPC	inc. UPC	Change 2001-11 inc. UPC (%)	(% points)
-	City of London	7,359			+54.84%	•			
-	Westminster Camden	203,329			+23.73% +19.17%				
-	Kingston upon Thames	202,567 149,045			+17.60%	•			
1	Welwyn Hatfield	97,550			+22.11%				
2	Runnymede	78,053			+11.02%				
3	Tendring	138,802	148,604	+9,802	+7.06%	138,062	-740	-0.53%	-7.59%
-	Merton	191,106			+12.37%	•			
4	Wokingham	150,334		•	+10.16%	•			
5	East Cambridgeshire	73,411			+21.24%				
6 7	Oadby and Wigston	55,791			+6.40% +8.70%	•			
8	Lancaster Leeds	134,049 715,609			+10.49%	•			
9	Guildford	129,774			+11.54%				
-	Southwark	256,712			+17.78%	•			
10	South Northamptonshire	79,497			+12.52%	•			
11	Coventry	302,804			+9.60%				-4.94%
12	East Lindsey	130,654	142,942	+12,288	+9.40%	136,683	+6,029	+4.61%	-4.79%
13	North Somerset	188,840			+12.33%				
14	Bracknell Forest	109,650			+8.38%	•			
-	Sutton	181,461			+9.90%	•			
15	Bedford	148,113			+11.09%				
16	Forest Heath	56,145			+11.24%				
- 17	Richmond upon Thames Torridge	174,311 59,129			+11.73% +12.22%	•			
-	Kensington and Chelsea	162,199			+12.22%				
18	Charnwood	153,554			+11.90%	•			
19	Wyre	105,800			+5.48%				
20	Aylesbury Vale	165,920			+8.93%	•			
-	Islington	179,387	211,976	+32,589	+18.17%	206,285	+26,898	+14.99%	-3.17%
21	Central Bedfordshire	234,006	262,828	+28,822	+12.32%	255,644	+21,638	+9.25%	-3.07%
22	Canterbury	135,381				•			
23	West Somerset	35,069			+1.66%	•			
24	Middlesbrough	141,233				•			
25	Ryedale	50,910				•			
26 27	Newcastle upon Tyne Arun	266,241 140,998			+7.75% +9.12%	•			
28	North Norfolk	98,495							
-	Bromley	296,218		•		•	·		
_	Tower Hamlets	201,090			+30.05%	•			
29	Bath and North East Somerset	169,158				•			
30	Boston	55,802							-2.64%
31	Sunderland	284,601	282,820	-1,781	-0.63%	275,330	-9,271	-3.26%	-2.63%
32	Colchester	156,016	177,695	+21,679	+13.90%	173,614	+17,598	+11.28%	-2.62%
33	Exeter	111,180				•			
34	Rutland	34,598		•		•			
35	Teignbridge	121,167				•			
36	South Tyneside	152,793							
37 38	Knowsley Broxtowe	151,238 107,481				•			
39	Barrow-in-Furness	71,960							
40	High Peak	89,400							
41	St. Helens	176,826		•		•			
42	Ribble Valley	54,053				•			
43	South Gloucestershire	245,985			+9.29%	263,417			-2.20%
44	Torbay	129,965			+3.13%				
45	Cornwall	499,937		·	+8.95%				
-	Barnet	319,481				•			
46	Newcastle-under-Lyme	122,015				•			
47 48	Waveney	112,497			+4.67%	•			
48 49	Norwich Kingston upon Hull City of	122,366 249 913	•	•	+10.13%	•			
49 50	Kingston upon Hull, City of Fareham	249,913 108,152			+4.49% +5.49%	•			
50 51	Maldon	59,589							
52	Three Rivers	82,905			+7.99%				
53	Bristol, City of	390,049			+11.67%				
54	Rushcliffe	105,780			+7.07%				
55	East Riding of Yorkshire	314,854				•			
56	Wellingborough	72,547							-1.88%
57	Wychavon	113,081				•			
58	Redcar and Cleveland	139,159							
59	Pendle	89,277				•			
60	Lewes	92,247				•			
61 63	Hart	83,590							
62	Forest of Dean	80,057				•			
63 64	Cherwell West Lancashire	131,988 108,480			+9.46% +3.62%	•			
64 65	West Lancashire Daventry	108,480 72,045							
	Southampton	72,043 219,539				•			
66	. 3. 3. 4. 1. 1 (3) 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Z 1 7. J. J.	4JJ.4/1	1 1 7 7 1/	1.7.00/0	£.1.1.07U		//\	1.0-70
66 67	Crawley	100,440				•			

Rank (exc London)	Local Authority	2001 MYE	2011 MYE exc. UPC	exc. UPC	Change 2001-11 exc. UPC (%)	inc. UPC	inc. UPC	Change 2001-11 inc. UPC (%)	(% points)
68 69	Mendip Castle Point	103,964 86,673				·			
70	Tewkesbury	86,673 76,524				·			
70 71	Fylde	76,324 73,340				-			
72	Hyndburn	81,495							
73	East Dorset	83,922				·			
74	Wakefield	315,380							
75	Northampton	194,351				-			
76	New Forest	169,506							-1.43%
77	York	181,291							
78	Isle of Wight	132,925	140,242	+7,317	+5.50%	138,392	+5,467	+4.11%	-1.39%
79	East Hertfordshire	129,145	139,884	+10,739	+8.32%	138,155	+9,010	+6.98%	-1.34%
-	Hillingdon	245,616	278,783	+33,167	+13.50%	275,499	+29,883	+12.17%	-1.34%
80	Epping Forest	120,972	126,486	+5,514	+4.56%	124,880	+3,908	+3.23%	-1.33%
81	Nottingham	268,939	307,468	+38,529	+14.33%	303,899	+34,960	+13.00%	-1.33%
82	Breckland	121,585				-			
83	Stockport	284,557				-			
84	Stratford-on-Avon	111,551				-			
85	South Lakeland	102,397				-			
86	South Holland	76,714				·			
87	Cotswold	80,387							
88 89	Swale Stockton-on-Tees	123,123 183,795				·			
90	Horsham	122,272				-			
91	West Devon	48,889				-			
91	Sedgemoor	106,030				·			
93	Derby	230,726				-			
95 94	Hinckley and Bosworth	100,202							
9 4 95	South Kesteven	124,877				·			
96	Vale of White Horse	115,772	•			-	•		
97	Taunton Deane	102,585							
98	Adur	59,714				-			
99	Blaby	90,361							
100	South Bucks	61,923				-			
101	Fenland	83,687				·			
102	Sefton	282,884				-			
103	South Cambridgeshire	130,476	150,809	+20,333	+15.58%			+14.84%	-0.74%
104	Herefordshire, County of	174,885	184,889	+10,004	+5.72%	183,619	+8,734	+4.99%	-0.73%
105	Bury	180,655	186,689	+6,034	+3.34%	185,422	+4,767	+2.64%	-0.70%
106	Gedling	111,812	114,501	+2,689	+2.40%	113,741	+1,929	+1.73%	-0.68%
107	Thurrock	143,297	159,214	+15,917	+11.11%	158,268	+14,971	+10.45%	-0.66%
108	Reigate and Banstead	126,661	139,209	+12,548	+9.91%	138,375	+11,714	+9.25%	-0.66%
109	Portsmouth	188,043	206,671	+18,628	+9.91%	205,433	+17,390	+9.25%	-0.66%
110	Wyre Forest	96,929	98,656	+1,727	+1.78%	98,048	+1,119	+1.15%	-0.63%
111	Malvern Hills	72,171		+2,969	+4.11%	74,706	+2,535	+3.51%	-0.60%
112	West Oxfordshire	95,701		-		-			
113	Warrington	191,202				-			
114	North Warwickshire	61,788							
-	Havering	224,717				•			
115	Suffolk Coastal	115,239				·			
116	Waverley	115,668				·			
117	Chichester	106,494				-			
118	West Lindsey	79,631							
119 120	Selby Tandridge	76,555 79,332		·		-			
120	Sevenoaks	109,242							
122	East Devon	125,713							
123	Windsor and Maidenhead	133,541				·			
124	South Ribble	103,949				-			
125	Salford	216,978							
126	Basingstoke and Deane	152,874				·			
127	Tonbridge and Malling	107,771	•	•		·	•		
128	South Derbyshire	81,738							
-	Lewisham	254,336							
129	Huntingdonshire	157,189							
130	Warwick	126,095				-			
131	Elmbridge	122,709	131,692	+8,983	+7.32%	131,428	+8,719	+7.11%	-0.22%
132	Bromsgrove	87,904	93,913	+6,009	+6.84%			+6.63%	-0.21%
133	Great Yarmouth	90,945	97,599	+6,654	+7.32%	97,424	+6,479	+7.12%	-0.19%
134	North Hertfordshire	117,051							
135	Bassetlaw	107,843				-			
136	West Berkshire	144,494				·			
137	Newark and Sherwood	106,351							
138	South Somerset	151,059				·			
139	Luton	185,889				-			
140	Solihull	199,574							
141	Amber Valley	116,560				·			
142	Eden	49,879							
-	Bexley	218,757							
143	Tamworth	74,596				·			
144	Chorley	100,559				·			
145	Hertsmere	94,466				-			
146	Rother	85,471				·			
147	Erewash	110,126				·			
148	Rossendale	65,647	67,993	+2,346	+3.57%	68,053	+2,406	+3.67%	+0.09%

Rank (exc London)	Local Authority	2001 MYE exc	11 MYE c. UPC	exc. UPC	Change 2001-11 exc. UPC (%)	inc. UPC	inc. UPC	Change 2001-11 inc. UPC (%)	(% points)
149 150	Cheshire West and Chester North Kesteven	322,154	329,180			· ·			
-	Redbridge	94,378 241,893	108,409 281,065			•			
151	Craven	53,706	55,372						
152	Tameside	213,087	219,380						
153	Plymouth	240,954	256,120			· ·			
154	Calderdale	192,379	203,730	+11,351	+5.90%	204,170	+11,791	+6.13%	+0.23%
155	Stroud	108,060	112,812			113,074	+5,014	+4.64%	+0.24%
156	Ashford	103,024	118,154	+15,130	+14.69%	118,405	+15,381	. +14.93%	+0.24%
157	Rochford	78,650	83,129	+4,479	+5.69%	83,333	+4,683	+5.95%	+0.26%
158	Blackpool	142,270	141,699	-571	-0.40%	142,080	-190	-0.13%	+0.27%
-	Enfield	277,266	313,146	+35,880	+12.94%	313,935	+36,669	+13.23%	+0.28%
159	Sheffield	513,102	550,286	+37,184	+7.25%	551,756	+38,654	+7.53%	+0.29%
160	Christchurch	44,901	47,761	•		· ·			
161	Preston	130,372	139,559						
162	Telford and Wrekin	158,573	166,216						
163	North East Derbyshire	96,927	98,720						
164	Melton	47,875	50,305						
165	Broadland	118,814	124,256						
166	Thanet	126,750	133,883			· · · · · · · · · · · · · · · · · · ·			
167	Hartlepool	90,152	91,712						
168	Harborough	76,818	85,362						
169	South Hams	81,929	83,167						
170	Cheshire East	352,104	368,991						
171	Harrogate	151,467	157,923						
172	Mole Valley	80,283	85,220			· ·	•		
173	Rotherham	248,349	256,419						
174	Medway	249,704	263,572						
175	Lichfield	93,229	100,388			· ·			
176	Winchester	107,264	116,216						
177	Purbeck	44,433	44,927						
178	Gravesham	95,791	101,195						
179	Chelmsford	157,269	167,444						
180	Harlow	78,799	81,651						
181	Ashfield	111,477	118,717			· ·			
182	County Durham	493,678	509,417						
183	King's Lynn and West Norfolk	135,565	146,949			· ·			
184	Maidstone	139,116	154,692						
185	Brentwood	68,483	73,309			· ·			
186	Braintree	132,482	146,484				•		
187	South Norfolk	110,848	123,625						
188	Barnsley	218,124	230,037						
189	East Northamptonshire	76,835	86,203			· ·	•		
190	Cheltenham	110,024	114,672						
191	Bolsover	71,887	75,378						
192	North Tyneside	192,003	199,402			· · · · · · · · · · · · · · · · · · ·			
193	Spelthorne	90,404	94,987						
194	North East Lincolnshire	157,951	158,147						
195	East Hampshire	109,369	114,903			· ·			
196	Burnley	89,521	86,100						
197	Worthing	97,661	103,971						
198	Test Valley	109,965	115,470			· ·	•		
199	Carlisle	100,764	106,336						
200	Derbyshire Dales	69,418	70,305			· ·			
201	South Staffordshire	105,942	107,070						
202	Scarborough	106,221	107,475						
203	Dacorum	137,843	143,654			· ·			
204	Staffordshire Moorlands	94,555	96,078			· ·			
205	Nuneaton and Bedworth	119,239	123,981						
206 207	Copeland	69,251 69,060	69,785 70,192			· ·			
207	Uttlesford Northumberland	68,969	79,183	•			•		
208	Northumberland	307,363	312,435						
209	Oldham	218,537	222,333						
210	Eastleigh	116,257	124,331						
211	South Oxfordshire	128,307	133,257						
212	Babergh	83,538	86,780						
213	Peterborough	157,439	182,312			· ·			
214	Chiltern	89,238	91,432						
215	Basildon	165,895	172,688			· ·			
216	Mid Devon	69,887	76,938						
-	Harrow	210,044	237,300			•			
217	Mid Suffolk	87,015	95,747			· ·			
218	Surrey Heath	80,309	85,151			· ·			
219	Stoke-on-Trent	240,422	245,019						
220	Gloucester	109,947	120,225			· · · · · · · · · · · · · · · · · · ·			
221	Allerdale	93,544	94,945						
222	Kettering	82,304	92,491						
223	Dudley	305,052	308,218						
224	Epsom and Ewell	67,077	74,082						
-	Hounslow	215,976	251,238			•			
225	Dartford	85,956	96,120			· ·	•		
226	North Devon	87,674	92,450						
227	East Staffordshire	103,938	112,040			· ·			
228	St Albans	129,168	138,967			·			
-	Lambeth	273,372	299,651	+26,279	+9.61%	304,481	+31,109	+11.38%	+1.77%

Rank (exc London)	Local Authority	2001 MYE	2011 MYE exc. UPC	Change 2001-11 exc. UPC	Change 2001-11 exc. UPC (%)	2011 MYE inc. UPC	Change 2001-11 inc. UPC	Change 2001-11 inc. UPC (%)	Difference (% points)
229	Eastbourne	89,836							<u> </u>
230	Wealden	140,184							
231	Bolton	261,302							
232	Lincoln	85,584				·			
233	Wiltshire	433,508							
234	North West Leicestershire	85,678							
235	West Dorset	92,495	•			-			
236	Gosport	76,676							
237	North Lincolnshire	152,964							
238	Poole	138,368				·			
239	Wigan	301,453							
240	Weymouth and Portland	63,758							
241	Broxbourne	87,203				·	•		
241	Cannock Chase	92,165							
242	Hambleton	84,168							
244	Chesterfield	98,832				-			
244	Rochdale	206,440							
						-			
246	Bradford	470,753				-			
247	Hastings	85,392				•			
248	Birmingham	984,642							
249	Rugby	87,520	•						
250	Oxford	135,509				·			
251	Milton Keynes	212,707				-			
252	Sandwell	284,594				·			
253	Stevenage	79,794							
254	Havant	116,886				-			
255	Kirklees	388,980							
256	Rushmoor	90,892							
257	Wolverhampton	238,016	•	•		-	•		
258	Wirral	315,004	310,449	-4,555	-1.45%	319,837	+4,833	+1.53%	+2.98%
-	Croydon	335,112	354,805	+19,693	+5.88%	364,815	+29,703	+8.86%	+2.99%
259	Dover	104,646	108,565	+3,919	+3.75%	111,718	+7,072	+6.76%	+3.01%
-	Ealing	307,276	329,942	+22,666	+7.38%	339,314	+32,038	+10.43%	+3.05%
260	Worcester	93,369	95,744	+2,375	+2.54%	98,679	+5,310	+5.69%	+3.14%
261	Stafford	120,712	127,089	+6,377	+5.28%	130,895	+10,183	+8.44%	+3.15%
-	Wandsworth	271,742	299,077	+27,335	+10.06%	307,710	+35,968	+13.24%	+3.18%
262	Swindon	180,129	203,901	+23,772	+13.20%	209,709	+29,580	+16.42%	+3.22%
263	Mansfield	98,065	101,340	+3,275	+3.34%	104,551	+6,486	+6.61%	+3.27%
264	Shropshire	283,254	297,573	+14,319	+5.06%	307,108	+23,854	+8.42%	+3.37%
265	Wycombe	162,050	166,476	+4,426	+2.73%	171,958	+9,908	+6.11%	+3.38%
266	Doncaster	286,900	292,729	+5,829	+2.03%	302,468	+15,568	+5.43%	+3.39%
267	Blackburn with Darwen	138,453	142,841	+4,388	+3.17%	147,657	+9,204	+6.65%	+3.48%
268	North Dorset	61,988	66,720	+4,732	+7.63%	69,002	+7,014	+11.32%	+3.68%
269	Walsall	253,333	260,152	+6,819	+2.69%	269,524	+16,191	+6.39%	+3.70%
-	Haringey	221,251	. 247,284	+26,033	+11.77%	255,540	+34,289	+15.50%	+3.73%
270	Trafford	210,172	219,213	+9,041	+4.30%	227,091	+16,919	+8.05%	+3.75%
271	Gateshead	191,178							+3.91%
272	Mid Sussex	127,397				•			
273	Corby	53,407							
274	Tunbridge Wells	104,049							
-	Hammersmith and Fulham	169,374				·			
275	Manchester	422,915							
276	Darlington	97,894				·			
277	Woking	89,893							
278	Liverpool	441,858							
279	Halton	118,559				-			
280	Brighton and Hove	249,949				·			
281	Redditch	78,779							
282	Ipswich	117,156	•			·			
283	Leicester	282,757				•			
284	Slough	120,577							
285	Southend-on-Sea	160,362	•	•		-			
286	Shepway	96,345							
287	Reading	144,684				-			
287	St Edmundsbury	98,323				-			
288 289	Bournemouth					·			
		163,560							
290	Richmondshire	47,067				·			
-	Waltham Forest	222,015							
291	Watford	80,398							
-	Greenwich	217,460				•			
-	Hackney	207,246							
-	Newham	249,411				•			
-	Brent	269,620							
292	Cambridge	109,941							
293	Isles of Scilly	2,140	1,918	-222	-10.37%	2,224	+84	+3.93%	+14.30%