

To estimate an absolute limit on the possible change in occupancy it is possible to apply a simple linear regression across the data which gives an estimate of approximately 2.0, still much higher than the assumption the Plan has used. This would still be overestimating the potential for the average occupancy to decline (using a simple linear relationship would ultimately lead to an average of less than 1.0 person per household which would be no

This therefore obviates the need to release any Green Belt land for residential development as this was only required for 6,000 new households which is much less than the 22,000 excess.

The plan is therefore:

1. **not positively prepared** as it has not objectively assessed development needs based on the available evidence;
2. **not justified** as it has not derived an appropriate strategy nor considered reasonable alternatives, based on proportionate evidence;
3. **not effective** as the plan will not be deliverable due to seeking to over provide new housing development; and
4. **not consistent** with national policy as it does not follow residential occupancy rates set out by the Office of National Statistics.