

Representation regarding the FOAHN figures for Welwyn Hatfield, Stage 9 Hearing.

In their report, “The implications of the 2018-based SNPP and SNHP on the Welwyn Hatfield OAN”, Turley (and edge analytics) reported on the household projection figures for 2018 for Welwyn Hatfield. In this report, they chose to use as their main recommendation, not the principal ONS calculation, but an alternative 5 year projection which brings in a bias toward the much higher population growth rates around 2014, compared to the 2016 -2018 data. I would dispute this decision to move away from the principal data and consider that it underplays the real changes that have occurred in the last few years to the population and household growth evidence.

Turley assert that the 2016 and 2018 ONS projections were calculated using a new method which they distrust, because the projections are markedly different. However, the ONS is satisfied with the validity of these calculations which are based on valid trends seen within the 2018 datasets. It therefore seems unreasonable that Turley do not accept the 2018 principal data as a basis for their calculations insisting that the 2016 and 2018 data is anomalous and that the 5 year projection is more reliable.

Looking through the data from the ONS, it seems more likely that in fact the bulge in population growth from 2013-2016 was the period with anomalous data, especially in Hertfordshire and that the figures for 2016 and 2018 are merely bringing the population growth trends back to a longer term average.

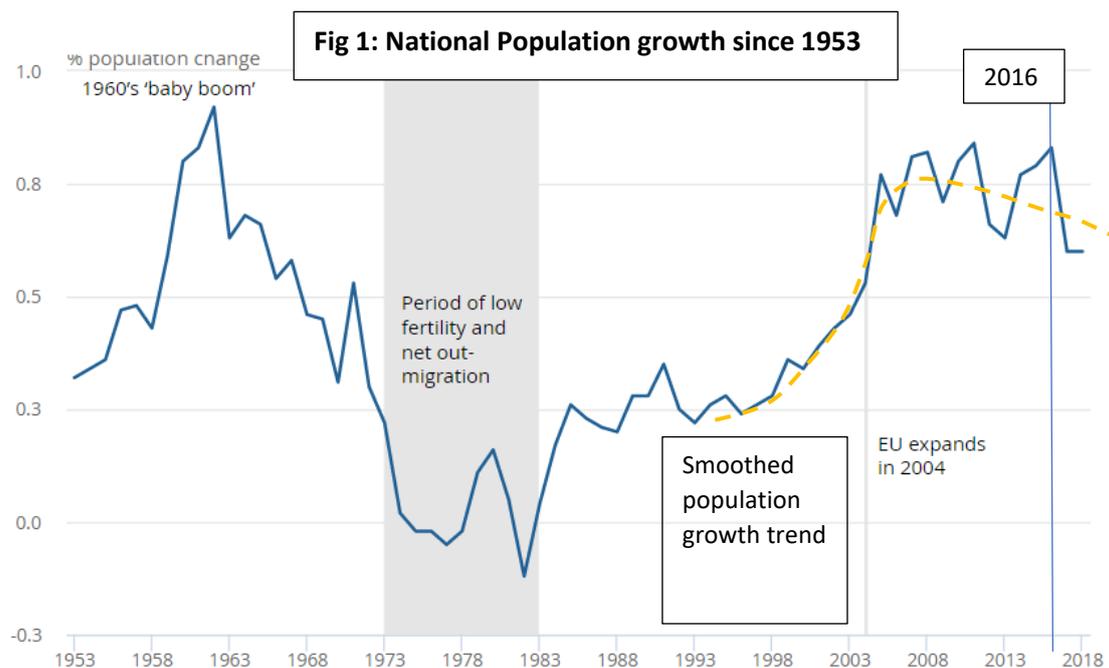
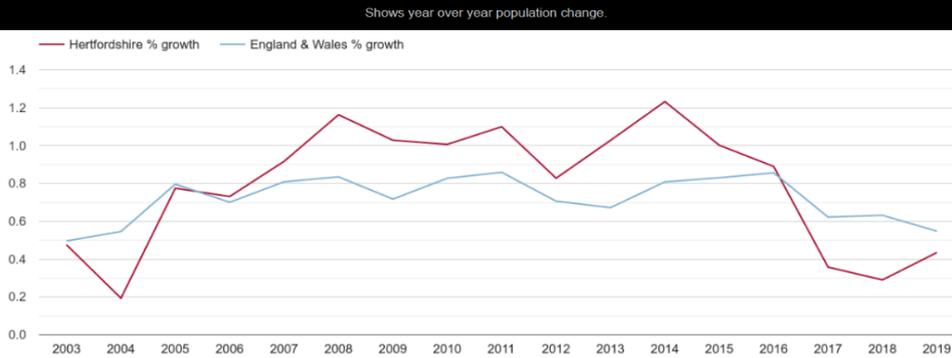


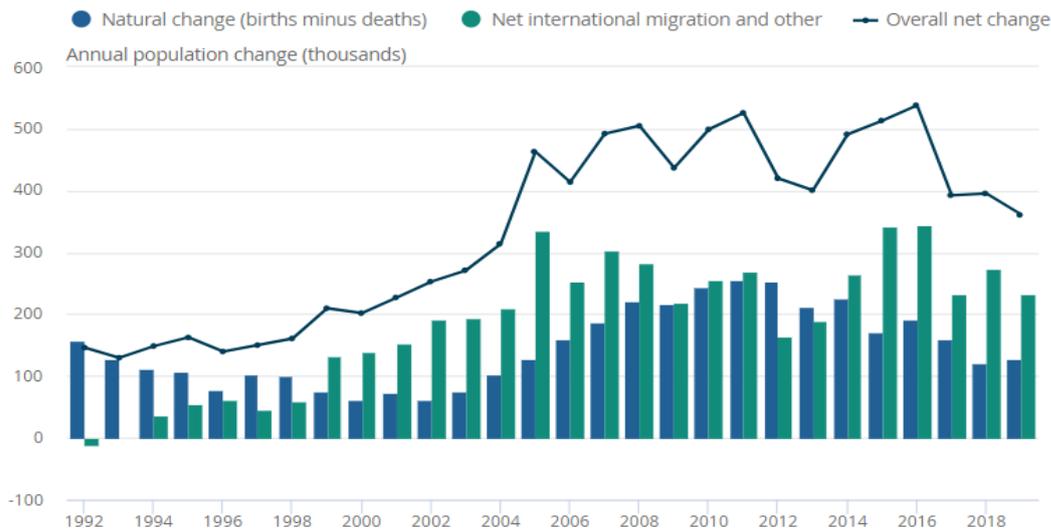
Figure 1 shows the national population growth over the last 65 years and the marked slower rate of growth in the last few years – the slowest since 2004. Figure 2. Shows the growth rate in Hertfordshire since 2003 which demonstrates an even more pronounced difference between growth rates in 2014 and 2018.

Fig 2: Hertfordshire population growth rate



These population growth trends are influenced by a) natural growth, b) international migration and c) internal migration. Figure 3 shows the national contribution from natural change and international migration. Falling natural change has been partly offset by growing international migration, but the overall net change is the lowest since around 2004.

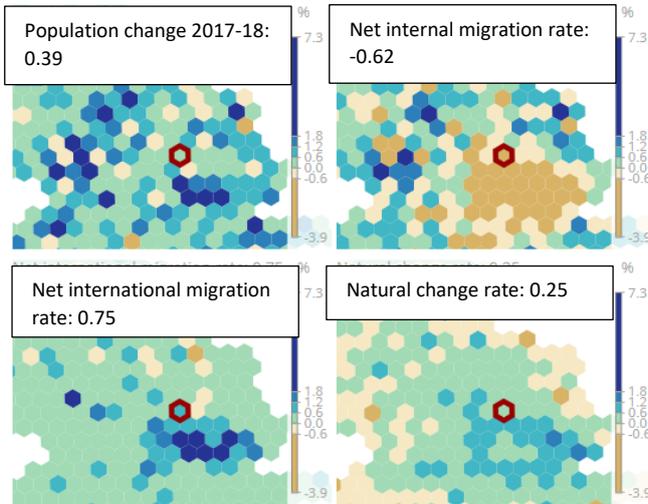
Fig 3: Relative contribution of natural growth and net International migration to population growth from 1992 - 2019



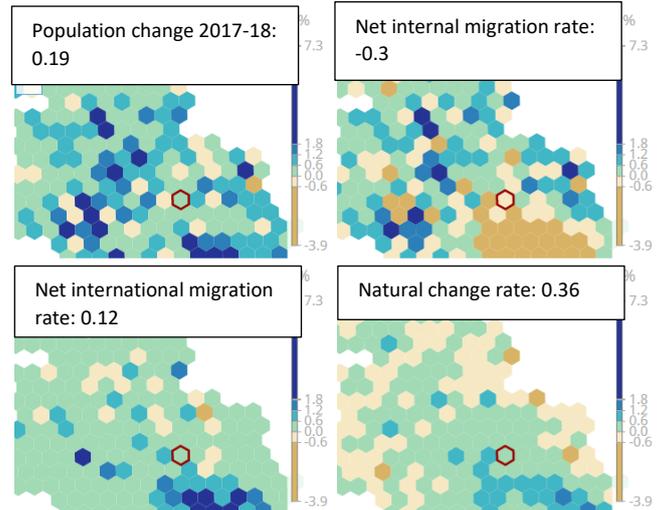
In 2018, a drop in natural growth was offset by higher international migration than in 2016, leading to a further decrease in population growth. Between 2015 and 2018, the ONS report that EU citizens show a marked net migration from the UK with fewer choosing to immigrate and more choosing to emigrate. In contrast, non-EU immigration into the UK has been gradually increasing since 2016 and the ONS state (Migration statistics Quarterly report: August 2020 section 5) that this immigration increase is dominated by international students.

The breakdown in the different population changes for 2017-18 by component in Figure 4 also demonstrates the dominance of the increase in international immigration in Welwyn Hatfield compared to St. Albans - a 0.75 increase compared with 0.12 (St Albans has been chosen as it has more similar overall rates of growth to Welwyn Hatfield than other neighbouring authorities).

Welwyn Hatfield



St Albans



Source: Office for National Statistics, National Records of Scotland, Northern Ireland Statistics and Research Agency - Population Estimates

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Fig 4: Comparing the relative contribution of natural change, net International migration and internal migration to population growth in Welwyn Hatfield and St. Albans in 2017-18

This dominance of the population increase by international students is important when related to Welwyn Hatfield which has a substantial population of students compared to neighbouring authorities. These students are more likely to be temporary residents and more unlikely to form new households. The ONS methodology since 2016 takes a more detailed account of student populations and is therefore more relevant than the alternative projection used by Turley. The comparison in demographics between Welwyn Hatfield and St Albans below shows this very graphically in the 18-30 age range.



Fig 5: Welwyn Hatfield and St. Albans population pyramids mid 2019

This is also clearly shown when sample age ranges are compared showing the 18-24 population is nearly 2.5 times greater in Welwyn Hatfield than St. Albans in 2019 (taken from the ONS population estimate data)

Welwyn Hatfield		St Albans	
Age: 0-17	20.7%	Age: 0-17	24.9%
18-24	13.8%	18-24	5.6%
35-40	35.4%	35-40	40.90%
85+	2.6%	85+	2.7%

If one accepts that the increase in international migration is dominated by International student populations who do not form households to the same degree, then it is entirely credible that household growth has been decreasing in the last few years in Welwyn Hatfield.

By using the alternative 5 year trend which is more biased towards the highest ever population and household growth rates in Hertfordshire, rather than using the principal data generated by the ONS for the 2016-2018 period, Turley have chosen a basic household projection which is too high. This is then made higher by using the 2014 headship rates, rather than a more recent headship rate.

In addition, Turley have applied all of the various uplifts in a compound calculation, rather than applying each of the adjustments to the principal number and summing these, inflating the numbers further. I don't know if this is standard practise, but it doesn't seem like good statistical practise.

A comparison with the OAN numbers in neighbouring authorities demonstrates that even at an OAN of 13000, Welwyn Hatfield is taking more growth per capita than any other authority in the county. Whilst most of these are at different stages in their local plan cycles, it still shows a very marked difference. Since all these authorities are essentially in the same regional housing market dominated by London, their OAN requirements should be similar.

The data is taken from Herts CC Infrastructure and funding prospectus 2018-2031

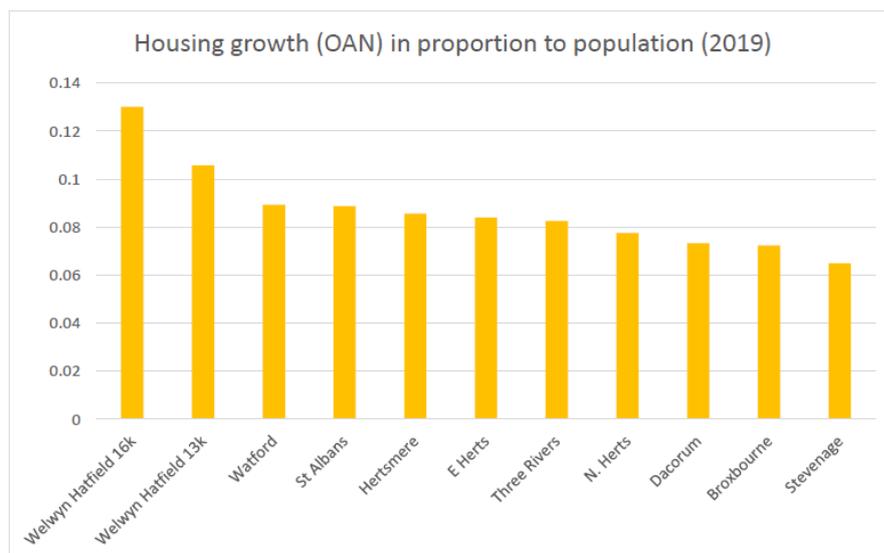


Fig 6: Comparison between the OAN numbers from nine of the local authorities in proportion to population and two alternative figures for Welwyn Hatfield. An OAN of 10,000 in Welwyn Hatfield would equate to 0.08, a median figure for Hertfordshire

In summary, I believe the ONS principle projection figure with suitable uplifts should be used, leading to an OAN of 10140 (as proposed at point 2.4 in the CPPP meeting of Nov 17th) as this more accurately reflects the most up to date 2018 data from the ONS.

However, I understand that the only three OAN options which have been proposed to the inspector are all higher than this. I would therefore reluctantly argue that the inspector should accept the lowest of these, namely 13,800 based on the alternative 10 year migration variant, rather than the 5 year variant. As Mr Colin Haigh said in his letter to you of Nov 18th "Having considered the Turley and officer advice carefully, Members felt the use of the ten year migration variant to be more credible than the five-year variant, as it provides a more stable outcome which is less susceptible to anomalies and better reflects economic cycles".

Jane Quinton