

## RESPONSE TO THE OAN FOR WELWYN & HATFIELD LOCAL PLAN

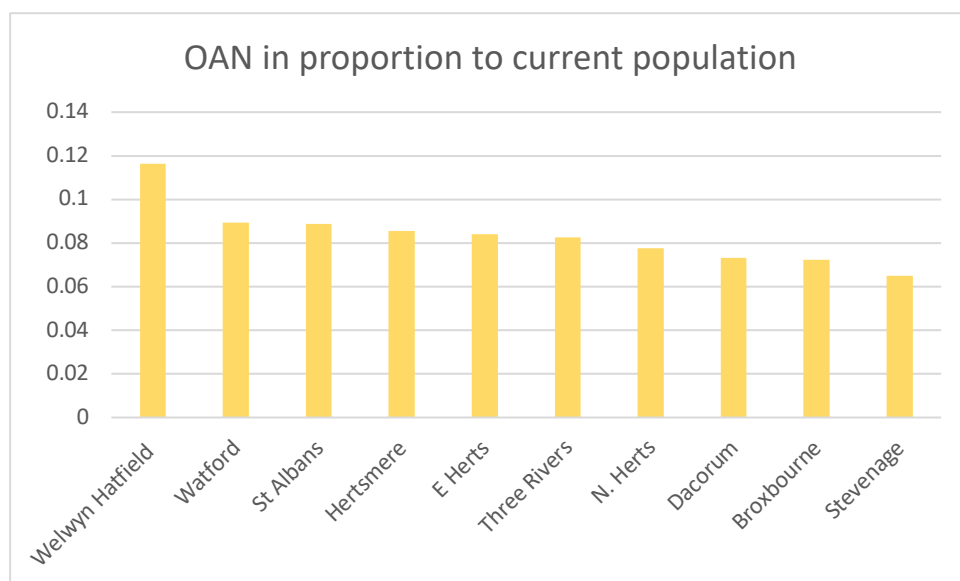
### Introduction

The issue that residents have always had with the OAN for Welwyn & Hatfield is consistency and fairness. The current OAN has maintained this concern. We have looked at this from a 'reasonableness' perspective rather than a technical challenge on the micro details of this OAN recommendation in an effort to illustrate that the application of the methodology and choices taken in formulating the parameters.

### Why is the WH OAN an outlier?

We accept that the OAN calculation comprises a standard methodology and location specific data so there will be some subtle differences between different boroughs in the same county. Indeed, this is case of every borough within Hertfordshire – with the exception of Welwyn and Hatfield.

Here is a chart that shows the OAN for each borough in proportion to their respective populations. Statistically they form a 'normal' pattern but at 14,300 the WH figure is considered an outlier or extreme figure. This has always been the case since the original 2016 figure of 12,000. As it increased to 16,000 and now at 14,300 it always maintained the highest level of development in the county by some margin and there is no apparent explanation as to why it is reasonable in the context of our county neighbours. When this has been raised in the past it was never supported by any evidence or technical explanation other than 'Welwyn and Hatfield is a popular place to live'



We looked at the most recent Turleys OAN and what was evident is that whenever a choice was made to select a particular parameter or methodology it usually was the one that resulted in a higher result. We did not have the time and resource to examine the WH OAN in comparison to other neighbouring local plans but it seems as though the compound effect of giving a modest but high bias to different elements of the OAN have had a major impact. We have pulled out one such element to illustrate the point.

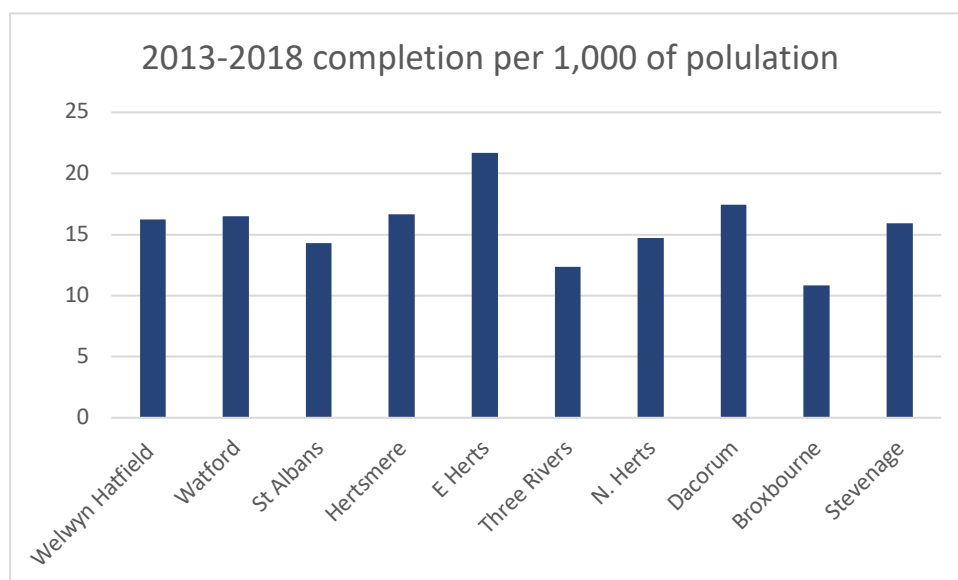
### How much is undersupply?

If it is accepted that development has not kept pace with demand its therefore reasonable to include an element of 'catch up'. But, again, this has been inflated and is highly subjective.

The figures used to determine 2013-2016 'targets' is based on an OAN figure (that included an allowance for undersupply – 800). This is clear case of double accounting as its banking a shortage before its occurred.

The only logical explanation for why the WH OAN has diverted from the norm (see above) is if the historical developments were substantially lower. The new 14,300 number contains an exceptionally high degree of retrospective developments – but this is not the case.

The following graph shows the comparison between historical (2013 – 2018) developments as a ratio to population. Here you can see that WH is quite average – not much better or worse than other boroughs.



This doesn't support the Turleys figures that suggest the lack of housing development is responsible for an extreme level of undersupply that needs to be corrected in future development. Other local plans have acknowledged a need to balance the undersupply in a future OAN but not to the extremes suggested by Turleys

In conclusion we just do not understand why 9 boroughs can produce an OAN that are in the same order of magnitude but 1 (Welwyn and Hatfield) is a clear outlier and with no reasonable explanation as to why.

We recognise that there is some, it seems significant, latitude in calculation an OAN that the above charts illustrate but, in this case and given the degree of the subjectivity involved, its difficult to justify it as a Full OBJECTIVELY Assessed Housing Need.