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4 January 2021

Dear Sir

Welwyn Hatfield Local Plan Examination – Response to consultation regarding EX215, EX216 and EX218

We write to you on behalf of our client Mr Cyril Shack, a regulation 19 submitter. This letter is in response to the Inspector's further consultation on the revised Objectively Assessed Housing Need ("OAN") put forward by the Council.

During the consultation on the revised OAN which took place in October 2020, we wrote to you on 28 October 2020 to express Mr Shack's support for the submission by the Northaw and Cuffley Parish Council, and the accompanying report by Chamberlain Walker which stated that an OAN of 13,000 dwellings over the Local Plan period was appropriate. It was noted, however, that there was clear justification for an even lower OAN of 12,000 dwellings. The Council's latest letter to the examination (EX215) does not change our client's position. As previously submitted, all latest available information indicates that housing requirements in Welwyn Hatfield is decreasing, not least being the Office of National Statistic's 2018-household projections which demonstrate a 39% decrease in the number of households since 2014.

It is further noted, as you have done in your letter to the Council dated 30 November 2020 (EX216), that any reliance by the Council on the Government's revised standard methodology for assessing housing need is misguided. Pursuant to the transitional arrangements of the National Planning Policy Framework 2020, the draft Local Plan is being examined against the policies in the National Planning Policy Framework 2012 ("**NPPF 2012**"), and any previous

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guidance associated with it. Therefore, while the Government's revised method for assessing housing needs and accompanying guidance provides insight into the future direction of housing need assessments (and why reference was made in our previous submission to the Government's earlier proposals about the standard methodology), it is not determinative for present purposes. Ultimately, Welwyn Hatfield's needs assessment must be undertaken in accordance with the NPPF 2012 and applicable guidance which requires it to be informed by the latest available information, all of which demonstrates that a reduced OAN of approximately 13,000 dwellings is appropriate.

It is sincerely hoped that with this further consultation, and the subsequent hearing about the same, will enable the Council and the Inspector to reach a general consensus as to an appropriate OAN that can be found sound. Only once this matter is satisfactorily settled can other important aspects of the draft Local Plan move forward, in particular, the identification of additional housing sites to meet the OAN which is an issue of critical importance to local communities, and it is in everyone's interest that this examination be concluded as soon as possible.

Yours faithfully

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