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Dear Sir

## Welwyn Hatfield Local Plan Examination

I am writing in response to your letter to the Head of Planning dated 4<sup>th</sup> February 2021 and specifically your suggestion that further technical work be carried out relating to the OAN.

You refer to the Government's recent decision relating to the standard methodology and its advice on the use of the 2014 Household projections. The Council has used the 2014 Household projections to calculate the submitted OAN but it has been informed by the latest population projections which take account of the latest analysis with regards to births and deaths.

### The use of the Standard Methodology

The Local Plan is being examined under the transitional arrangements and the relevant policy and guidance. The Council notes the government's preference for the use of the 2014 Household projections. The Leeds decision does require the Inspector to consider the latest projections and whether or not there is a material change. The Council's analysis takes the latest population projections and then applies the 2014 household formation rates. Our view is that there is a material change based on falling natural change (falling numbers of births and rising numbers of deaths through to 2036) as evidenced by the projections and highlighted in the Turley evidence. The natural change elements of the ONS projections seem to be more certain and reliable than the migration elements of the projections.

You refer to Turley's comments in paragraph 4.11 of **EX203A**. This comment relates to concerns with regards to the use of the 2018 Principal population projection forecast which was based on 2 years of data related to their revised methodology accounting for student migration and not the 2018 ten year variant which informs the Council's analysis of the OAN or the five year Alternative scenario.

### Commuting, Jobs and Employment Land Supply

The Council has concerns about the extent to which official data on the number of jobs in the borough is reliable which result in an increase in the number of jobs of over 20,000 (a 30% increase) most notably in the retail sector between 2015 and 2017 is unlikely for the

reasons that have been previously discussed at the hearing sessions. The evidence on employment land supply submitted to the Examination and debated at the Hearing Sessions in December 2019 demonstrated that the introduction of permitted development rights for the conversion of employment land to residential had had a significant impact on the supply of employment land. The latest monitoring data indicates that this trend is continuing and that the shortfall against the less ambitious target of meeting the needs arising from a growth in the economically active population will increase. The latest position on employment land supply is attached to this letter.

The Council is putting together the data the Inspector has requested on the economically active population and jobs for the period 2011-19. It should be noted that the data on the size of the economically active population set out by Turley in EX203A is associated with the demographic projections when they considered the implications of the 2018 projections. However the calculation of the OAN additionally adds 21% on top of the adjustments to take account of the 2014 household formation rates and concealed households. Consequently the size of the economically active population will be larger than that indicated in the demographic projections. The size of the labour force needs to be adjusted accordingly and it is anticipated that the data will be available this week for the session on 23rd February.

The Council are not planning for an increase in commuting rates and this should not be a factor in setting the OAN.

### **Updated evidence base**

Thank you for the offer of looking at a longer term time horizon. Unfortunately a longer term horizon brings into play the issues associated with unattributable population change as well as the 'one off event' relating to the redevelopment of Hatfield Aerodrome. These were issues which were discussed at the 2017 stage 2 sessions and is one of the reasons Welwyn Hatfield has in the past previously preferred the use of 5 year trend data.

These issues no longer apply to the 10 year trend data and its use would be consistent with the approach adopted in a number of neighbouring authorities. These include East Herts, Luton, Bedford, Harlow and Stevenage and Local Plans currently at examination North Herts and Central Bedfordshire. The Council would not have confidence in the robustness of the data for a longer term horizon.

### **The Need for Affordable Housing and Affordability**

The Inspector is correct that there has been no recent update of the need for affordable housing. Previous evidence indicated that the need in the borough was so high that the full need could not be met through the planning system. The Council will be in a position to provide updated information on numbers on the Housing Register. The Analysis in the original SHMA also looked at other sources of data but this did take some time to put together and would result in a delay to the hearing sessions if the Inspector considered this was necessary before the OAN session could take place. The reference in paragraph 6.2 to the retention of an OAN at 800 relates to a different plan period and as Turley go onto argue does not take account of changing market signal evidence. Section indicates that a much higher markets signal is now being applied than in the original SHMA (21% compared to 10%).

### **Boost in Housing Land Supply**

Both the 690 dpa and the 715 dpa provide a "significant boost" to housing delivery in accordance with the NPPF. The previous Structure Plan housing target for the period 1991-11 was 5,600

dwellings or 280 dpa whilst the long term average for completions is 453 per year (19 years 2000/1 to 2019/20) 690 dpa is a 50% boost on this.

Yours sincerely

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