

Responses to Turley's Technical OAN paper on *The implications of the 2016-based SNPP and SNHP on the Welwyn Hatfield OAN EX103A, June 2019, and to Turley's Technical Review of the Submission by Green Balance for Save Symondshyde EX103D, June 2019*

by SAVE SYMONDSHYDE

1. Turley's reports for Welwyn Hatfield BC on the implications of the 2016-based household projections are notable for the remarkable lengths they take to argue that dwelling requirements to be established in the Local Plan should be substantially higher than they really need to be. It is not clear why the Council accepted these arguments (report to Cabinet Planning and Parking Panel 3 July 2019, EX103).
2. Perhaps surprisingly, both Turley and Green Balance began from the same position in their understanding of the 'starting point' for calculating dwelling requirements. Turley's Technical OAN paper of June 2019 in section 3 correctly identified that the starting point under the 2014-based household projections yielded a dwelling requirement over the Plan period of 670 per annum and the 2016-based projections a requirement for 601 dwellings per annum. This is a difference of just over 1,300 dwellings across the period 2013-32. Turley commented both that "the suggestion that 10% fewer homes are needed in Welwyn Hatfield could reasonably be interpreted as representing a 'meaningful change' from the previous projections" (paragraph 3.4) and "The scale of this change is considered to warrant further consideration" (paragraph 3.5). These are reiterated in paragraph 6.2.
3. Green Balance too considered there was a prima facie case for the dwelling requirements to be revisited, on the same evidence (indeed that was the main, limited aim of the paper). Green Balance wanted the Local Plan Examination to reassess the dwelling requirements, whereas Turley did not. Green Balance argued that the dwelling requirement might need to be reduced still further (because the total number of dwellings required at the end of the Plan period – and not just the increment in household numbers over the plan period – was further reduced). In contrast, Turley argued that if their own assessments were taken into account then the dwelling requirement would be barely altered – mainly by using assumptions which bypass the 2016-based household projections. Given the very considerable differences between the parties on the interpretation of the 2016-based household projections beyond the agreed 'starting point', there appears to be a clear need for the issues to be debated in an open Hearing session of the Local Plan Examination.
4. The remainder of this paper addresses the arguments presented by Turley, to show just how selective they are. The Plan would be unsound if based on them. Proposals on each issue are unjustified and on issues (1) & (3) not in conformity with Government policy.
 - 1) The basis for estimating housing requirements is the latest household projections, not the latest population projections
5. Both Green Balance (paragraph 1.9) and Turley's Technical OAN paper (Executive Summary paragraph 6) emphasise this. However, Turley immediately sets about attempting to claim the superiority of the population projections which underlie the household

projections, taking more than half the Executive Summary to do so (paragraphs 9-18). Paragraph 12 of the Turley Executive Summary reports, correctly, that ONS made different assumptions regarding the formation of households in the 2016-based household projections from those made in the 2014-based projections. The gist of the Turley approach is that this was wrong.

6. Turley conclude that “there is clearly a prospect that the 2016-based assumptions will *underestimate* the household growth that will result from future change in the population (2016-based SNPP)” (paragraph 5.14). As a result “On this basis, whilst the relevant PPG requires the latest projections to be used as a starting point, it is concluded that this could, for Welwyn Hatfield specifically, be limited to the use of the 2016-based SubNational Population Projections, with the application of 2014-based SubNational Household Projections headship rate assumptions” (Executive Summary paragraph 15, our emphasis).

7. Paragraph 5.24 of Turley’s Technical OAN paper goes even further, extraordinarily proposing that the entire 2016-based household projections be set aside and the 2014-based household projections retained. However this does not appear to be the final Turley position. Paragraph 5.24 states “Within the context of these outstanding concerns [with the 2016-based household projections] around the reliability and applicability of the new assumptions, there is considered to be merit in retaining the previous 2014-based rates for the purposes of assessing housing need in Welwyn Hatfield at the current point in time.”

8. This approach is simply not acceptable as it is clearly contrary to Government policy. In any event, ONS does not accept that the change in its methodology was wrong in the way Turley claim. ONS is held in high regard and has properly explained its methodology, rightly stating “household projections are not a measure of how many houses would need to be built to meet housing demand; they show what would happen if past trends in actual household formation continue” (What our household projections really show, 19 October 2018, ONS). The details are presented under issues (2) and (3) below.

2) The alleged deficiency in the 2016-based household projections, focused on the revised method for calculating household formation rates, has been massively overstated by Turley

9. Most of the arguments presented by Turley for not liking the 2016-based household projections as a basis for planning in Welwyn Hatfield concern the household formation rate assumptions. The Turley case is that “In producing the 2016-based household projections, the ONS has implemented a new approach to household formation rates. This draws upon trends in household formation within a shorter ten year period (2001 – 2011) than was previously the case, with the 2014-based projections building household formation rate trends over a period which stretched back to 1971” (Technical OAN paper, June 2019, paragraph 5.4). Previous work by Edge Analytics and Turley had found that household formation rates declined between 2001 and 2011, so the effect of the change in methodology would be to ‘lock in’ those lower rates into the household projections, resulting in housing requirements being less than if household formation rates in 2001 had been sustained. (All this was of concern to Turley because they believed that the lower rate

of household formation was caused by dwellings becoming less affordable, that being due to reduced house building rates, which itself was caused by release of insufficient land through the planning system. This is a sequence of arguments addressed in issue (4) below.)

10. There should be no surprise that the Office for National Statistics was wholly alert to the effects of what it was doing at the time. Its 'Methodology used to produce household projections for England: 2016-based' (3 December 2018) explains both the reasoning and consequences in its section 5. In essence, the 2011 Census slightly changed the definition of the 'Household Reference Person' (HRP) which is the basis for calculating household formation rates, and the 2016-based household projections come into line with that. ONS says "This is with a view to improving the transparency of the projections and increasing coherence with other standard population statistics.... This also provides internal consistency of definitions within different household projection breakdowns." Turley has chosen to ignore these benefits.

11. One consequence of changing the HRP definition was that it was no longer possible to use the 1971, 1981 and 1991 Census data. ONS explain that complex adjustments had previously had to be made to 2011 Census data to produce the 2014-based household projections. "Using the 2011 Census HRP definition in the 2016-based household projections removes the need for these adjustments, improving the transparency and accessibility of the methodology."

12. ONS reported "There is general acknowledgement that between 1971 and 2001, average household size declined and household formation increased. Between 2001 and 2011, these trends slowed down; average household size remained broadly the same and household formation did not increase as much (or even declined for some age groups)." As a result "It is unclear whether the trends seen between 2001 and 2011 were a blip in the long-term trend (this being an unusual decade due to EU Accession and the financial crisis), or the start of a longer-term trend."

13. This acknowledgement of uncertainty in trend is enormously different from accepting that the 2016-based household projections were so wrong that they should not be used, in the way that Turley is suggesting. Turley compound the difference by making out that ONS thought there was a problem. "The ONS has acknowledged that the methodological changes implemented through the 2016-based household projections could 'result in a downward trend in household formation for the younger age groups, which in turn would downplay the need for housing for younger people'" (Technical OAN paper paragraph 5.7). What ONS actually said, in the methodology report referenced by Turley, was "In the consultation on proposed changes to household projections for England, a total of 15 respondents considered using data from only two censuses to be insufficient. There was a view that only using the 2001 and 2011 Censuses would *result in a downward trend in household formation for the younger age groups, which in turn would downplay the need for housing for younger people.*" It was consultees, not ONS, who thought there might be a problem. This matter is misreported with even greater emphasis in Turley's Executive Summary which states that the Government's antipathy to the 2016-based household projections "reflects concerns – **identified by the ONS themselves** – that the methodological changes implemented through the 2016-based household projections"

could downplay housing needs (paragraph 13, emphasis in original). They were NOT the concerns of ONS.

14. ONS’s response to the uncertainty which it has identified in Household Representative Rate was instead to be cautious about projecting forward the trends from 2001-2011 into the longer term: the 2016-based projections only carry the HRR forward 10 years to 2021, and then hold this constant at the 2021 rate. This shows that the trends from 2001-2011 have not been locked into the entire projection period (to 2041), and the effects should therefore not be overstated. It is misleading for Turley to assert that “the latest projections also fix household formation rates after a five year projection period (i.e. from 2021 onwards), which risks entrenching suppressed rates and removing the prospect of future improvements” (Technical OAN paper paragraph 5.6).

15. The Household Representative Rate/Headship Rate used in the 2014-based household projections also used information from the 2001 and 2011 Censuses, (as did the 2016-based household projections), but ‘dampened’ by the long term trend influence of the 1971, 1981 and 1991 Censuses. Although using long term data sources reduces the volatility effect between any two consecutive Censuses, we are somewhat unclear why experiences in, say, 1971-81 should be given any weight in 2019. The most recent information is what should count most, and that is what ONS has done in the 2016-based household projections by using just the 2001 and 2011 Census data. Turley has overlooked the likelihood that the 2016-based household projections were more reliable on this basis than were the 2014-based household projections.

16. As transparent as ever, ONS itself included in its methodology report a sensitivity test applying the headship rates in the 2014-based household projections to the 2016-based population projections (in section 8). (This test was not a Turley idea.) This isolated the effects of the methodological changes to the household formation rates on the resulting household projection. It suggested that, nationally, the household projections would have been about 12% higher if the methodological changes had not been made. This is informative, but does not necessarily mean that the methodological changes were unjustified (about which Turley complain). The change in Welwyn Hatfield was distinctly less than this, around 8%.

17. Finally, Turley appear to us to have greatly overstated the claimed problem in principle. The surplus of dwellings over households grew discernibly between 2001 and 2011 in Welwyn Hatfield. This suggests that housing was more readily available at the later date and that the decline in household formation rates amongst young people over the period should not be attributed to an alleged worsening in housing supply. The following table using data from the 2001 and 2011 Censuses demonstrates this:

	<u>No. of households in WH</u>	<u>No. of dwellings in WH</u>	<u>Surplus of dwellings</u>
2001	39,844	40,705	2.2%
2011	43,613	45,531	4.4%

3) The Government's latest approach to calculating housing requirements is to use a 'standard method' which relies on the old 2014-based household projections, but Government policy precludes the taking of this approach in the Welwyn Hatfield Plan

18. Turley's Technical OAN paper refers to the Government's rejection of the latest 2016-based household projections in the new 'standard method', preferring the use of the 2014-based projections (Executive Summary paragraph 13). This is largely irrelevant because Government policy is absolutely clear that that the standard method is not to be applied to Local Plans submitted for Examination before 24 January 2019 (such as Welwyn Hatfield's).

19. Nonetheless, Turley argue that the reasons which the Government gave for not using the 2016-based household projections in the 'standard method' should apply in the Welwyn Hatfield case, concluding that "it is not appropriate at this point to directly apply the headship rate assumptions in the 2016-based SNHP to calculate an updated OAN for Welwyn Hatfield" (Executive Summary paragraph 14). That is wholly contrary to Government guidance on the procedures to be used in Local Plans submitted before 24 January, and should not be accepted.

20. The Turley argument also elevates to credibility the Government's case. There was widespread derision when the decision was announced: most commentators considered that the real reason the Government rejected the 2016-based household projections for use in its 'standard method' was because the outturn figures were lower than the 2014-based projections, which was inconvenient for the Government's national policy objective to achieve the building of 300,000 dwellings annually in England in due course. Indeed MHCLG itself relied heavily on arguments about the benefits of increasing housing supply, unrelated to the household projections, to justify its position (see paragraphs 11 and 12 of the October 2018 MHCLG *Technical consultation on updates to national planning policy and guidance*, noting that the arguments there were reasserted in the Government's final decision on the 'standard method' in February 2019). Reinforcing the separation of the merits of the household projections from their implications, MHCLG also stated in its October 2018 consultation that "For the avoidance of doubt, the Government is clear that this does not mean that it doubts the methodological basis of the 2016-based household projections. It welcomes the work of the Office for National Statistics (ONS) following the transfer of the projections from the Ministry of Housing, Communities and Local Government and the steps they have taken to explain the projections, for example in their recent blog" (that being the October 2018 blog entitled "What our household projections really show").

21. The reality is that the 2016-based household projections are thorough, competent and properly explained, and can be used as the starting point for calculating Welwyn Hatfield's housing requirements, in line with Government policy. The difficulty is that Turley would like a much higher housing requirement specified in the Borough than the projections imply.

22. Two additional instances of Turley stretching the facts can be found in paragraphs 1.18 and 1.20 of their Technical OAN paper. In paragraph 1.18 they refer to the MHCLG

written submission on Matter 17 of the Greater London Plan Examination (Hearing on 5 February 2019). Turley assert in their paragraph 1.19 that this means that “the concerns expressed by MHCLG strongly indicate that any lowering of need resulting from [integrating the ‘latest available’ projections] would need to be very carefully considered and justified”. The MHCLG submission was clear that “pages 6-9” of the Technical Consultation were “considered to provide relevant background to the level of weight that should be afforded to the revised household projections”. This covers paragraphs 7-14 of the consultation, which are wholly devoted to the ‘standard method’ for assessing housing need. The standard method is not relevant to the Welwyn Hatfield Plan, as noted above. In any event, even allowing for the Government’s encouragement of housing provision and for its concerns about the implications of the latest household projections, MHCLG cannot make up national policy on the hoof in submissions to Plan Examinations: we consider it would be wise to treat its submission to the London Plan, and indeed its decisions on the ‘standard method’, simply as ‘background’ – as it said.

23. The Turley statement in its paragraph 1.20 is another instance of Turley asserting that a MHCLG statement means what Turley would like it to mean. The MHCLG November 2018 Planning Update Newsletter included just 15 lines on ‘Technical consultation on updates to national planning policy and guidance’. These are of great brevity and written in plain English rather than intended for technical analysis. The reference to “Plans submitted on or before 24 January 2019 can be based on existing assessments of housing need” does indeed appear there, but this is clearly not intended to replace the detailed proposed policy. It is mischievous and a disservice to planning for Turley to assert that this is changing policy from using the ‘latest available’ household projections to using the projections available at the start of the Examination process (enshrined in Turley’s 2017 SHMA Update).

4) Household formation in the 25-34 age group has declined somewhat since 2001, and this is reflected in the household projections, but additional land supply will not discernibly revive household formation amongst prospective young house buyers

24. Turley attributes reduced household formation by young people to worsening affordability of dwellings in the private sector, itself caused by insufficient house building, in turn caused by inadequate land supply. There are myriad flaws in this argument. Turley considers that past trends in household formation reflected in the household projections paid insufficient attention to affordability among younger age households. Worsening housing affordability since 2001 is said to have caused significant numbers of (young) households not to form. Turley wants a return to a (mythical) golden age of household formation 18 years ago which it seems to believe can be achieved by releasing more land for housing after 2019. Turley (and, for that matter, the Government) have wholly failed to address the how the housing market might work to achieve this, which is more complex.

25. Wider housing market factors are:

- The greater number of concealed households in recent years could partly reflect wider economic conditions (austerity) and the tightening of mortgage lending criteria since the recession, making it more difficult for younger families to afford to move from their family home (SHMA 2014, paragraph 3.56).

- the requirement to contribute to student tuition fees began in 1998 (max. £1,000pa) and the obligation to repay student loans therefore became significant only in the 2001-2011 period. Maximum tuition fee payments rose to £3,000 from 2004 and to £9,000 from 2011. Finding money for tuition fees and/or repaying student loans has had a significant impact on the ability of younger people to pay for housing, encouraging more young people to live with parents for longer. Rising costs after 2011 indicate this consequence is likely to have been more pronounced since then.
- Releasing more land is a wholly unreliable means of increasing house building (which in the Turley argument is the route to improved affordability and thus increased household formation). Land can be stockpiled and dwelling supply drip-fed to the market to keep house prices up: house builders don't want to depress their own selling prices. Welwyn Hatfield BC's most recent Annual Monitoring Report is instructive on this: the Council had expected that net completions would 'not quite reach' the target of 498 dwellings per annum in 2017-18, but still exceed 400. In reality only 315 net were built. The Council was clear that "The shortfall was largely due to lower build out rates on some of the medium sized sites" (paragraph 5.3). In other words, some house builders chose not to build at anything like the rate at which their land supply would have facilitated: that is a market problem, not a planning problem.
- Affordability does not explain household formation. Housing becomes less and less affordable during housing booms – yet it is at these times when housing supply and headship rates both increase most markedly. In contrast, during the last recession, household formation rates for the 25-34 age group declined, even though affordability improved greatly and land supply was plentiful (see for example Edge Analytics Figure 9 in Appendix 1 to the SHMA Partial Update 2015). The state of the housing market clearly has far more impact on affordability and household formation than does land supply.
- It is entirely unrealistic to expect that any extra land release will result specifically in cheaper house prices for first time buyers: it would be lost into the wider land market. Household formation rates amongst younger people would be unaffected.
- Finally, even in the extremely implausible event that household formation amongst younger people could be increased by the intervention proposed, forecasting work by Edge Analytics showed that the headship rate in the 25-34 age group would soon decline again at its previous rate (SHMA Update 2017, Appendix 1, Figure 22). Affecting the headship rate would only be a short-term palliative.

The conclusion must be that it is inconceivable that extra land releases now for private housing supply will result in discernibly higher household formation rates in the 25-34 age group.

26. In addition to broad housing market factors, the SHMA itself has identified reasons why Welwyn Hatfield is different from the national average in respect of household formation. It has specifically noted that lower headship rates may be because more younger people do not wish to form their own separate household. Household size in Welwyn Hatfield rose from 2.39 to 2.45 between 2001 and 2011, which the SHMA attributed particularly to new international migrant households to the area, which often

constitute large household sizes (SHMA 2014, paragraph 4.109). This is a matter separate from land supply influencing household formation in Welwyn Hatfield.

27. The SHMA is already proposing to add land for 51 dwellings per annum to the 'starting point' (in the assessment of OAN) to 'rectify' the household formation rate amongst young people. Save Symondshyde is strongly opposed to this (see submissions earlier in the Examination process) as land releases cannot possibly have the desired consequence. Turley now argues, in section 5 of its Technical OAN paper, that the 2014-based household formation rates should be applied to the 2016-based population projections, with the result that the annual dwelling supply 'starting point' would rise from 601dpa to 658dpa (paragraph 5.12 and Table 5.1). This would apply 2014 household formation rates across all age groups, instead of 2016 rates. In other words, in practice, an extraordinary additional 57 dwellings per annum should be added to the land requirement in addition to the previous 51dpa. This would make 108dpa which, across the 19 years of the Plan period, would oblige the release of land for 2,052 dwellings for households which do not exist (but which Turley believes would be caused to form). This is magisterially excessive. Even if the principle was accepted, it would double-count the proposed increases in housing land supply in response to 'market signals', which is claimed to make housing more affordable.

5) The 2016-based household projections have not been rejected as a basis for planning at the Local Plan Examinations in some authorities in the way that Turley claim

28. In paragraph 5.15 of its June 2019 Technical OAN paper, Turley state: "The latest projections have also been disregarded in a number of other Local Plan Examinations over recent months". This carries the clear implication that this was due to the lack of merit of those projections: this is confirmed in their paragraph 5.23, which specifically refers to methodological changes in household formation as the reason why recent Local Plan Examinations have disregarded the 2016-based household projections. A footnote cites Kirklees, South East Lincolnshire, Stockton-on-Tees and Poole.

29. That claim is utterly misleading:

- In Poole, the 2016-based household projections appeared only shortly before the Inspector issued his report, after the Examination Hearings and after the close of consultations on the Main Modifications. Reviewing them would take time and the Inspector wished to progress to adoption of the Plan.
- In South East Lincolnshire the Inspectors were clear that the 2016-based household projections had appeared too late in the process to be taken into account.
- Similarly in Stockton-on-Tees the 2016-based household projections appeared during the consultation on the Main Modifications. The Inspector wished to avoid the inevitable delay to the adoption of the Plan which full assessment of the projections would entail – possibly for little change to the policies.

It was the timing rather than the merit of the 2016-based household projections which caused them to be omitted from consideration in these three Local Plan Examinations.

30. In Kirklees, the 2016-based household projections were issued only after the Local Plan Examination Hearings. The local planning authority was not concerned by these lower projections because it wished to promote growth by sticking with the earlier 2014-based projections, and the Inspector did not resist that. In Kirklees, therefore, the new projections were in effect disregarded, but not for their inherent lack of merit. Turley were again economical with the full truth.

31. Turley are more accurate in their report that the neighbouring authority of Broxbourne attributed “limited weight to lower 2016-based household projections in an approach that has been endorsed by the Inspector examining their Local Plan”. Here too the 2016-based household projections appeared late in the Examination process. The Inspector briefly reopened consideration of the issue, but Broxbourne did not wish to change its OAN. Although a lower figure would have resulted, the use of the standard method, although not appropriate to a Plan submitted before 24 January 2019, would have produced a figure much closer to that in the submitted Plan. The Inspector accepted this in a single sentence in an interim note, though his reasoning is not known as his full report has yet to be issued. The main point we derive from the Broxbourne experience is that the Inspector considered it appropriate to hold an additional Hearing session to discuss the new projections: what the outcome would be of the same approach in Welwyn Hatfield does of course remain open.

32. Relevant extracts from the five Inspectors’ Reports and Notes are attached as an Appendix.

33. The likelihood of delay to the adoption of Local Plans was clearly an important consideration in the decision of various Inspectors not to hold an additional Hearing session into the 2016-based household projections at their Examinations. In the case of Welwyn Hatfield, the Examination of the Local Plan still has many months to run, and there need be no delay to Plan adoption if a Hearing session into the revised household projections was held. This could easily be scheduled while other issues are under review. Furthermore, if our approach to the methodology for deciding the OAN in the new Plan period is accepted, then the dwelling requirement will be substantially lower than in the submitted Plan, and the task of finding sites to satisfy those requirements would be made much easier. This could reduce the time needed for the site identification part of the process.

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APPENDIX**Inspectors' treatment of the 2016-based household projections in five recent Local Plans**

A1. The detailed statements by the Local Plan Inspectors in the five cases mentioned by Turley and commented upon in our text above are as follows.

A2. Poole Local Plan Inspector's Report, 24 October 2018, paragraph 28:
 "... it is the case that the most recent (2016-based) Office of National Statistics population projections indicate lower population growth in Poole than that on which the 2015 and 2017 SHMAs were based and since the consultation on main modifications was completed related household projections have been published. However, such projections would not necessarily lead to a housing OAN for Poole significantly lower than the 710 dpa on which the plan is based; as with the 2015 and 2017 documents a SHMA based on these projections would need to consider the case for uplifts to reflect suppression of household formation, alignment with economic growth and affordable housing. Considering these matters through a further update of the SHMA would inevitably take a considerable amount of time. There is almost always some emerging, or about to emerge, new evidence or guidance of potential relevance to a local plan. If the completion of plan examinations were to be delayed to take account of such new evidence/guidance few plans would ever be adopted. It is also of note that the PPG (Paragraph: 016 Reference ID: 2a-016-20150227) indicates that housing assessments are not automatically rendered outdated every time new projections are issued."

A3. SE Lincolnshire Inspectors' Report, 29 January 2019, paragraph 36:
 "Although the government's 2016-based Household Projections are now available, they emerged late on in the examination. There must come a point when the carousel of updating evidence stops so that a plan can proceed to adoption, and for this reason it is reasonable to adhere to the 2014-based projections."

A4. Stockton-on-Tees Inspector's Report, 17 December 2018, paragraph 41:
 "During consultation on the MMs the 2016-based household projections were published. Nationally, the figures show a slower household growth than previously projected. A similar trend was identified when assessing historic projections in the SHMA. However, assessing the full implications of the changes would require an update of the SHMA, and inevitably delay adoption of the Plan. In addition, the latest projections would not necessarily result in a lower OAN for Stockton-on-Tees, as the SHMA uses 10-year trends and applies uplifts for concealed families and the Council's strategy for elderly accommodation. The PPG also confirms that that housing assessments are not automatically rendered outdated every time new projections are issued."

A5. Kirklees Inspector's Report, 30 January 2019, paragraph 43:
 "Since the Local Plan hearings the Ministry for Housing, Communities and Local Government (MHLG) has published new 2016-based household projections which indicate lower household growth for Kirklees compared to the 2014-based projections. However, this does not automatically mean that OAN should be revised downwards, as the projections

represent a starting point and the case for uplifts linked to market signals, affordability and economic growth would need to be assessed. The Government's recent consultation paper indicates that Council's applying the standard methodology should continue to use 2014-based figures, but the Kirklees Plan is being considered under transitional arrangements. Nonetheless, the Council has confirmed that it wishes to continue to pursue the OAN identified in the SHMA 2016 in order to support economic growth and the delivery of jobs. Taking these factors into account, in the case of Kirklees I conclude that a revision to the demographic starting point and the approach to OAN is not necessary at this stage."

A6. Broxbourne Local Plan Inspector, Post Hearings Advice, 10 December 2018:
"The proposal in policy DS1 to make provision for at least 7,718 homes in the period 2016-2033 is justified and consistent with national policy."