

**WELWYN HATFIELD LOCAL PLAN EXAMINATION:  
ADDITIONAL DOCUMENTS CONSULTATION: AUGUST 2019**

**Representations of CPRE Hertfordshire**

**IMPLICATIONS OF 2016-BASED HOUSEHOLD PROJECTIONS FOR HOUSING  
PROVISION (DOCUMENTS EX102B and EX103D; EX103; and EX103A).**

1. Campaign to Protect Rural England, Hertfordshire (CPREH) wishes to make representations on the above documents in respect of the significance of the ONS 2016-based sub-national Household Projections for Welwyn Hatfield Borough for the soundness of the Submitted Welwyn Hatfield Local Plan.
2. These representations respond to the Programme Officer's email of 20 July 2019 inviting representors to comment on Examination Documents EX101 to EX152.
3. At the time of preparation of these representations the Council was still considering how to proceed following the submission of representations on additional potential housing sites and possible changes to Green Belt boundaries and other modifications to the submitted Plan in the light of the Inspector's comments on it, and the Inspector's further letter to the Council dated 8 August 2019. Such proposals, in the form of possible modifications to the Plan would need to consider the consequences for the Green Belt, and CPREH has previously stated a wish to participate in the Inspector's examination of any such changes at future hearings held by the Inspector.
4. The aspect of soundness that is addressed by these representations is whether sufficient evidence of exceptional circumstances has been demonstrated to justify the scale and location of housing allocations proposed in the Green Belt by the Council in the Local Plan, and is also relevant to any modifications to the Plan that may be proposed by the Council as a result of its current review of the housing proposals in the Plan as a result of the Inspector's advice to the Council following the initial stages of the Examination.

**Green Balance Report on Household Projections (EX102B)**

5. CPREH agrees with most of the arguments put forward in the Green Balance Report, especially in respect of the national planning policy and the calculations in section 2, of households in 2013 and 2032, showing a significant fall in the number of actual and projected households.

6. We consider that this Report demonstrates a meaningful change in housing need from the information available to the Council in preparing the Submission Local Plan.

### **Council Response to Green Balance Report, and Turley Report on Household Projections (EX103, EX103A and EX103D)**

7. Section 4 of the Report to the Cabinet Panel (EX103) unhelpfully refers to a policy context that does not apply to the Local Plan in seeking to justify the use of older (2014-based projections. National policy is clear that the basis for establishing housing need for this Local Plan must be the latest projections using the advice applicable to the 2012 NPPF.
8. The Report to the Panel goes on to simply note that their consultants, Turley (in EX103A) consider that Housing Need for the Plan period is unchanged despite the latest projections.
9. CPREH therefore wishes to support the critique of the Council's, and their consultants, Report (EX103A), submitted by Green Balance on behalf of Save Symondshyde for the detailed reasons set out in those representations.
10. The principal implications of the 2016-based Household Projections are that assessed housing need is likely to be significantly lower than assumed by the Submitted Plan, and that there is less justification for removing land from the Green Belt to accommodate housing on the scale proposed by the Plan and those promoting additional sites for removal from the Green Belt through the additional sites consultation.
11. In summary, CPREH is highly critical of the Council's response to the latest household projections because it seems to be intent on circumventing national policy based on an unrealistic and unjustified Council aspiration to return younger household headship rates to pre-2001 levels irrespective of whether this is desirable or achievable 20 to 30 years after they last applied.
12. The Council's response (EX103D) by their consultants, to the Green Balance report (EX102B) on the household projections, is similarly deficient in repeatedly advocating the application of a combination of 2016-based household projections and earlier 2014-based assumptions. This approach is specifically ruled out by national policy that requires the application of both the 2016-based projections and the planning guidance

applicable to the 2012 NPPF. CPREH therefore considers that little credence can be given to the criticisms by Turley of the Green Balance report.

13. We are also concerned that Turley have made, in paragraph 11, unreasonable assumptions about, and misinterpretation of, the Broxbourne LP Inspector's comments on this topic in respect of the Broxbourne Local Plan. The Inspector's two page post-hearing advice note referenced in the Turley document, made no comment at all on the implications of the latest household projections in stating, in one short sentence, that the proposed housing provision of 7,718 homes in Policy DS1 was justified and consistent with national policy. There was no reference to housing need in the Inspector's Advice, no approval for the use of 2014-based household projections in assessing need, and no explanation for his interim findings, which he specifically stated would be made clear in his still awaited Report to Broxbourne Council.
  
14. The Inspector examining the neighbouring North Herts Local Plan, also under the terms of the 2012 NPPF, has however written to North Hertfordshire District Council, expressing the following concerns, amongst others, about that Plan's proposed housing provision and allocations in the Green Belt as follows:

'In relation to identifying the OAN, the PPG says:

*"Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued."* (Paragraph: 016 Reference ID: 2a-016-20150227).

'6. This gives rise to two questions: whether the OAN is informed by the latest available Information (CPREH emphasis); and if it is not, whether the latest available information would give rise to a 'meaningful change' in the housing situation (CPREH emphasis). Since the last hearing sessions, 2016-based population and household projections have been published. These projections represent the latest available information and the OAN underpinning the Local Plan is not informed by them. My task, then, is to establish whether these projections lead to a 'meaningful change' in the housing situation.

15. 'There are two points to raise here. Firstly, my consideration of this point is critical to the examination – my conclusions regarding the OAN and the soundness of the Local Plan's housing requirement depend on it (CPREH emphasis). But because of the timing of the publication of the 2016-based projections, this point is not one that has been discussed

at any hearing session (CPREH emphasis). This is such a fundamental issue that it would, in my view, be unfair to participants to proceed without a hearing (CPREH emphasis).

'8. Secondly, I am not entirely clear about the evidence and arguments made out in writing on this issue. The Council's note '*Implications of new household projections for NHDC Local Plan*' [ED159] considers the 2016-based household projections. At Table 1, figures are presented taking the 2016-based household projections as the starting point, then adding vacancy rates and market signals uplifts in line with the method used to calculate the two OANs on which the Local Plan is based. These suggest that the OAN for the Stevenage HMA part of North Hertfordshire is 10,900, and that the OAN for the Luton HMA portion is 100 homes. This is 2,800 homes fewer than the OAN figure of 13,800 on which the submitted Local Plan requirement of 14,000 is founded. I will say now that, taking these figures at face value and considering the context here, I regard this to amount to a 'meaningful change.' (CPREH emphasis).

7. The Inspector goes on to summarise his concerns:

'In short, I have reservations as to whether the Council's note sets out appropriate and robust OAN figures on the basis of the 2016-based projections. Considering the task with which I am charged in relation to the aforementioned 'meaningful change' issue, this is a shortcoming that must be resolved.

'10. I note that Table 2 in the Council's note provides figures referred to as the 'potential 20-year standard method figures using 2016-based household projections'. This appears, in effect, to generate OAN figures by inputting the 2016-based household projections into the standard method formula set out in the PPG supporting the 2019 NPPF. However, it is plain from the revised PPG supporting the 2019 NPPF that the 2014-based household projections should be used in conjunction with the standard method formula. I am concerned that these figures are therefore not consistent with national policy, and as such I have doubts about their usefulness.'

'11. Considering the above, I regard exploration of the OAN at a further hearing to be essential.' (CPREH emphasis).

16. The Inspector set out in his paragraph 32, an action for the Council in the light of these concerns:

'I therefore request that the Council produces concise papers setting out:

a) what the Council considers to be the most appropriate OAN figure founded on the 2016-based projections, including any uplifts and the reason for them, explaining the alternatives and why the selected figure is considered to be the most appropriate. This should indicate the Council's view as to whether the most appropriate 2016-based OAN figure represents a 'meaningful change' from the OAN currently underpinning the Local Plan housing requirement. It should also respond to my comment above about the consistency with national policy of using the 2016-based household projections in the applications of the standard method formula'.

17. Although the NHLP Inspector's comments in his paragraphs 10 and 32 relate to calculations of potential housing numbers applying the future use of a standard method, his criticism is of mixing 2016-based projections with other steps advocated by the latest PPG, not the PPG applicable to the NPPF2012. We are concerned that WHBC's consultants' approach is also inconsistent with national policy as set out in NPPF 2012, and that their calculation of housing need seems to be based on an unjustified policy decision by the Council (to attempt to boost younger household formation rates), rather than an objective assessment as required by the NPPF
18. CPREH continues to agree with the Green Balance report's findings on the relevance and applicability of the latest household projections, and considers that the criticisms by the Council and their consultants to be without merit.
19. CPREH considers that the latest evidence of housing projections changes the balance in determining the number of additional dwellings that should be provided for in the Plan, and the justification for the housing allocations proposed in the Green Belt in the submitted Plan against national policy for the protection of the Green Belt set out in the NPPF 2012.
20. Failure to reduce the housing requirement figures in the Plan as a result of the latest projections would therefore render the Plan unsound in the opinion of CPREH through both inconsistency with national planning policy and lack of justification for the Plan's proposals for development in the Green Belt.