

**E-mail**

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Dear Mr Haigh

**WHBC Local Plan Review - Objectively Assessed Housing Need**

1. We act for Mr Cyril Shack in respect of the ongoing Welwyn Hatfield Local Plan Review. We understand that Mr Shack has written to the Welwyn Hatfield Borough Council ("**Council**") on several occasions recently requesting a review of the Council's objectively assessed housing need ("**OAN**") given the recent Covid-19 outbreak. We write to you further to that recent correspondence.
2. The Planning Policy Guidance on Housing and Economic Needs Assessments ("**PPG**") as it applies to this plan review, provides that local needs assessments should be informed by the "*latest available information*" and "*meaningful change in the housing situation should be considered in this context*". The current PPG also provides that for policy-making purposes, local authorities should calculate their local housing need figure at the start of the plan-making process but that "*this number should be kept under review and revised where appropriate*".
3. The Council initially commissioned Turley in 2014 to prepare a Strategic Housing Market Assessment ("**SHMA**") as part of its evidence base to inform its emerging Local Plan, which included an OAN in compliance with the National Planning Policy Framework and the PPG. The SHMA was then periodically reviewed and revised in 2015, 2016 and 2017 in light of updated economic information; and the 2017 SHMA Update was subject to examination in October 2017 which ultimately gave rise to the OAN figure of 16,000. In 2018, the Council commissioned Turley and Edge Analytics to consider the implications

of newly released sub-national population and household projections on the OAN, as well as the revised local plan period. However, the conclusion at the time was that the latest projections did not represent a meaningful change for the purposes of assessing housing need in Welwyn Hatfield to justify a review of the OAN, and as such the OAN remained reasonable and justified.

4. The Council will appreciate, however, that since this review was published June 2019, there have been two major events which have fundamentally changed the nature of the UK's economy; the first being Brexit which took place on 31 January 2020, and the second being the recent outbreak of the global Covid-19 pandemic. These two events are having unprecedented impacts on the UK's economic, employment and population projections, while the Covid-19 pandemic specifically is giving rise to concerns about a prolonged global recession.
5. This drastic change in circumstance is resulting in material and meaningful changes to the housing situation in the UK and these changes must be considered in the context of the ongoing Local Plan review. The existing OAN is now out of date and unreliable and any strategic policies being considered to provide for that OAN risk being found unsound for failure to be positively prepared and justified.
6. We respectfully request that the Council commission an immediate and comprehensive review of the OAN in light of current circumstances to ensure the ongoing Local Plan review is proceeding on the basis of the latest available information. Of course, any such review should take account of the 2018 sub-national household projections as they become available but these projections must be considered within the new context of Brexit and Covid-19. Failure to do so risks the soundness of the Local Plan and would be entirely unreasonable in the circumstances.
7. We have copied this letter to the Planning Inspectorate.

Yours faithfully

**Clifford Chance LLP**

cc: Melvyn Middleton, Planning Inspectorate  
c/o Programme Officer  
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