

**Proof of Evidence**  
**In Respect of**  
**Welwyn Hatfield**  
**Borough Council's**  
**Housing Mix &**  
**Five Year Housing**  
**Land Supply**

PINS Reference

APP/C1950/W/22/3294860

Appeal Site: Bio Park

Rebuttal Evidence of Alex Roberts

Prepared on behalf of

HG Group

June 2022

## CONTENTS PAGE

### Table of Contents

1 – INTRODUCTION .....	3
2 – JUSTIN GARDNER – WELWYN GARDEN CITY CIVIC SOCIETY .....	4
3 – MIKE SPURGEON – WELWYN HATFIELD BOROUGH COUNCIL .....	6

## **1.0 Introduction**

### **1.1 Overview**

- 1.1.1 I have been instructed by HG Group Ltd to give evidence on the issue of the scheme's proposed Housing Mix and Five-year housing land supply in Welwyn Hatfield.
- 1.1.2 This rebuttal proof of evidence has been prepared in response to evidence submitted by Mike Spurgeon on behalf of Welwyn Hatfield Borough Council and Justin Gardner on behalf of Welwyn Garden City Civic Society.
- 1.1.3 Issues not responded to raise in the proofs of Mr Spurgeon, Mr Parton and Mr Gardner, within this evidence, does not infer agreement.

**2.0 Justin Gardner – Welwyn Garden City Civic Society**

- 2.1.1 At his paragraphs 24 to 25, including table 1, Mr Gardner attempts to reproduce a previous table I prepared within the appellant’s statement of case. The table produced by Mr Gardner does not acknowledge that the delivery figures he relies on include student accommodation in 2019/20. Albeit I included this quantum in my own table 8 (page 25) as it was not possible to discern which years the student accommodation was completed, I made clear in my proof of evidence that I did not accept it should be counted towards past completions of meeting need. However, I did not prepare a table showing the effect of removing it, as I considered it was straightforward to note the change.
- 2.1.2 Nonetheless, as this has now been included in JG’s proof, with no reference to the student accommodation and infers that it should be included in the total, I have therefore prepared a new table, which shows cumulative year on year delivery, for each typology, which now omits this student development and compares the past delivery against the SHMA/Mix used in JG’s Table 1. I have not carried out an analysis to identify other student accommodation permissions implemented within the timeframe.
- 2.1.3 My new Table 1 demonstrates that the concluding points in JG’s paragraph 25, that there is a ‘surplus of this size of accommodation’ is incorrect. As with overall housing delivery, the Council’s own implied mix for all typologies has not been met between 2013 and 2021.

**Table 1: Comparison of delivery against mix, removing student accommodation**

	<b>Total Delivered 2013-21</b>	<b>Cumulative Percentage</b>	<b>SHMA / Mix (derived from JG Table 1) need 2013-21</b>	<b>Difference</b>
<b>1 Bedroom</b>	694	24%	832	-138
<b>2 Bedroom</b>	1332	45%	1408	-76
<b>3 Bedroom</b>	350	12%	2624	-2274
<b>4 Bedroom</b>	285	10%	1472	-1187
<b>Other</b>	286	10%	N/A	N/A
<b>Total</b>	2947		6400	-3453

- 2.1.4 The Planning Practice Guidance (PPG) Paragraph 034 Reference ID: 68-034-20190722) provides the guidance on how LPAs can count student housing in the housing land supply:
- All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority’s housing land supply based on:*
- *the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and / or*

- *the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation.*

*This will need to be applied to both communal establishments and to multi bedroom self-contained student flats. Several units of purpose-built student accommodation may be needed to replace a house which may have accommodated several students.*

*Authorities will need to base their calculations on the average number of students living in student only accommodation, using the published census data, and take steps to avoid double-counting. The exception to this approach is studio flats designed for students, graduates or young professionals, which can be counted on a one for one basis. A studio flat is a one-room apartment with kitchen facilities and a separate bathroom that fully functions as an independent dwelling.*

- 2.1.5 It is recognised that all student accommodation can in principle count towards contributing supply, however this should be based on:
- The amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use), and, or
  - The extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation
- 2.1.6 Student accommodation should not automatically be included, and in order to justify its inclusion, it would be incumbent on the LPA to demonstrate that the tests in the PPG are met, based on evidence.
- 2.1.7 Within the Council's AMR (CD B10), where the footnote identifying the unusually large number of completions for 2019/20 is first recorded, no evidence is provided by the Council which sets out that new student accommodation will release converted market housing, back to the general housing market. Having looked through the various housing need reports prepared for the Council, as part of the Local Plan examination, I cannot find such a document.
- 2.1.8 It is worth noting that the University of Hertfordshire, which has its main campus locations in Hatfield, grew in terms of student population, between 2018/19 and 2019/20 (Appendix 1 and 2 of this rebuttal), as set out in the two most recently available Finance and Strategic Reports by the University. In 2018/19 the total student body, studying in the UK was 24,280 and by 2019/20 this had grown, by over 1,200 to 25,520. It's clear the university is growing its student base
- 2.1.9 Therefore, on this basis my conclusion is that the inclusion of the student units with the past completions, is not appropriate. The PPG is very clear that LPAs must produce evidence to demonstrate the contribution of student accommodation to releasing market housing, the Council have not done this.

### **3.0 Mike Spurgeon – Welwyn Hatfield Borough Council**

- 3.1.1 Mr Spurgeon at paragraph 4.11 to 4.12 and including table 1, refers to the Appellant suggesting the population for 20 to 39-year olds is higher than the national average. Mr Spurgeon provides no reference to other documents, and I cannot find any reference to these figures within the Appellant’s Statement of Case Appendix on Housing Mix and Land Supply, nor have I identified this in my evidence. I therefore cannot confirm this forms part of my client’s case in this appeal. The analysis carried out within table 1 and then summarised in paragraph 4.12 is not an analysis I have carried out myself, nor is it something I would advise doing. It is not clear what the rationale is by reducing the 3 and 4 bed components of the Council’s implied mix by 11% respectively, and then increasing the 1 and 2 bed components by the same amount. This table serves no purpose in considering whether the proposal meets needs or not, as the uplifted need figure is meaningless. This is now relied on by the Council in their evidence, through Mr Spurgeon, I consider this analysis should be given very little weight.
- 3.1.2 Paragraphs 4.13 to 4.14 and table 2 inclusive consider the change in implied mix from one assessment to the next. Whilst they are similar at a percentage level, when this is translated into actual dwellings, there is clearly an increase. If we assume the housing requirement is 760 dpa, a 14% of that is 106.4, and 14.5% is 110.2, and 15% is 114, multiplying this over a 5, 10 or 15 year period the differences add up. However, it is important to recognise that the housing requirement that is used for the appeal, is not based on that proposed through the Local Plan, it is that calculated using the Standard Methodology, which in 2022 is 888dpa (CD D4, Page 7), therefore 14.5% is 128.76dpa, 19 dwellings more than what the Council suggest.

## APPENDIX 1

The image features a grid of teal-tinted windows, likely from a modern building. Overlaid on the right side of the grid are several thin, yellow, wavy lines that curve across the frame. In the top-left corner, there is a solid red shape consisting of several overlapping semi-circles.

**STRATEGIC REPORT AND  
FINANCIAL STATEMENTS**  
**2018–19**

University of  
Hertfordshire **UH**





# Contents

<b>Introduction by the Chair of the Board of Governors and Pro Chancellor</b>	<b>4</b>
<b>Introduction by the Vice-Chancellor and Chief Executive</b>	<b>5</b>
<b>Year at a glance</b>	<b>6</b>
<b>Strategic Report</b>	<b>8</b>
Putting our students at the core of our decision making	10
Creating Go Herts moments in sport	14
Research that can change lives	16
Making a difference in the business community	18
Transforming education overseas	22
Enabling participation within the community	24
Investing in our people	28
Maximising the impact and sustainability of our estate	32
Enhancing the digital experience	34
<b>Financial Review and Risks 2018–19</b>	<b>36</b>
Risks	42
Student numbers	44
<b>Statement of Corporate Governance</b>	<b>46</b>
<b>Statement of Internal Control</b>	<b>50</b>
<b>Responsibilities of the Board of Governors</b>	<b>52</b>
<b>Auditor's Report</b>	<b>54</b>
<b>Financial Statements</b>	<b>56</b>
Consolidated and University Statement of Comprehensive Income	58
Consolidated and University Statement of Changes in Reserves	59
Consolidated and University Balance Sheets	60
Consolidated Cash Flow Statement	61
Statement of principal accounting policies	62
Notes to the accounts	69
<b>Governors and advisers</b>	<b>105</b>
<b>Officers appointed by the Board</b>	<b>106</b>



## Strategic Report and Financial Statements 2018–19

Student numbers

# Student numbers

The following tables show an analysis of our student profile for 2018–19.

### Mode and level of study

Full-time and sandwich	Postgraduate research	250
	Postgraduate taught	1,780
	First degree	15,130
	Foundation degree	380
	Other undergraduate	50
<b>Total</b>	<b>17,590</b>	
Part-time	Postgraduate research	290
	Postgraduate taught	3,820
	First degree	1,500
	Foundation degree	340
	Other undergraduate	740
<b>Total</b>	<b>6,690</b>	
<b>Total students studying within the UK</b>		<b>24,280</b>

### Gender

Female	14,010	57.7%
Male	10,270	42.3%
<b>Total</b>	<b>24,280</b>	<b>100.0%</b>

### Ethnicity

White	10,750	44.3%
Asian or Asian British	5,660	23.3%
Black or Black British	4,290	17.7%
Chinese	960	4.0%
Other (including mixed race)	2,220	9.1%
Unknown/information refused	400	1.6%
<b>Total</b>	<b>24,280</b>	<b>100.0%</b>

### Geographic region

England	19,480	80.2%
Wales	100	0.4%
Scotland	80	0.3%
Northern Ireland	60	0.2%
Guernsey, Jersey and the Isle of Man	20	0.1%
Other EU	850	3.5%
Non EU	3,700	15.2%
<b>Total</b>	<b>24,280</b>	<b>100.0%</b>

Student numbers represent head count not FTE (full-time equivalent). All student number figures are rounded to the nearest 10. Total figures are also rounded to the nearest 10. The sum of numbers in a table may not match the total shown.

### Subject area

Medicine and dentistry	10	0.0%
Subjects allied to medicine	6,110	25.2%
Biological sciences	1,430	5.9%
Agriculture and related subjects	40	0.2%
Physical sciences	340	1.4%
Mathematical sciences	210	0.9%
Computer science	1,780	7.3%
Engineering and technology	1,660	6.8%
Architecture, building and planning	190	0.8%
Social studies	1,140	4.7%
Law	1,480	6.1%
Business and administrative studies	4,400	18.1%
Mass communications and documentation	250	1.0%
Languages	380	1.6%
Historical and philosophical studies	210	0.9%
Creative arts and design	2,520	10.4%
Education	2,000	8.2%
Combined	120	0.5%
<b>Total</b>	<b>24,280</b>	<b>100.0%</b>

### Students from outside the UK – top 10 countries

India	990	4.0%
China	660	2.7%
Nigeria	370	1.5%
Pakistan	260	1.1%
Malaysia	240	1.0%
Ireland	130	0.5%
Portugal	120	0.5%
Bangladesh	90	0.4%
Spain	70	0.3%
Cyprus (European Union)	70	0.3%
<b>Total</b>	<b>3,000</b>	<b>12.2%</b>

### Students studying wholly outside the UK

#### Students on overseas franchise programmes

Malaysia	4,110
Russia	340
Canada	250
Singapore	230
Sri Lanka	100
Other countries	100
<b>Total (students on overseas franchise programmes)</b>	<b>5,130</b>

Students on distance learning programmes outside the UK (across 120 countries)

**Total (students studying wholly outside the UK)** **6,580**

**Total student numbers 30,860**

## APPENDIX 2



**STRATEGIC REPORT AND  
FINANCIAL STATEMENTS**  
**2019–20**





## Contents

Introduction by the Chair of the Board of Governors and Pro Chancellor	4
Introduction by the Vice-Chancellor and Chief Executive	5
Year at a Glance	6
Strategic Report	8
Education and Student Experience	12
Research	18
Enterprise	24
Global Engagement	28
Supporting our Community during Covid-19	30
Financial Review	34
Risks	38
Student Numbers	42
Statement of Corporate Governance	44
Statement of Internal Control	50
Auditor's Report	52
Financial Statements	54
Consolidated and University Statement of Comprehensive Income	56
Consolidated and University Statement of Changes in Reserves	57
Consolidated and University Balance Sheets	58
Consolidated Cash Flow Statement	59
Statement of Principal Accounting Policies	60
Notes to the Accounts	67
Governors and Advisers	105
Officers appointed by the Board	106

# Student numbers

The following tables show an analysis of our student profile for 2019–20.

## Mode and level of study

<b>Full-time and sandwich</b>	Postgraduate research	250
	Postgraduate taught	3,950
	First degree	14,980
	Foundation degree	340
	Other undergraduate	50
<b>Total</b>	<b>19,570</b>	
<b>Part-time</b>	Postgraduate research	280
	Postgraduate taught	3,240
	First degree	1,640
	Foundation degree	190
	Other undergraduate	600
<b>Total</b>	<b>5,950</b>	
<b>Total students studying within the UK</b>	<b>25,520</b>	

## Gender

Female	14,070	55.1%
Male	11,450	44.9%
<b>Total</b>	<b>25,520</b>	<b>100.0%</b>

## Ethnicity

White	10,160	39.8%
Asian or Asian British	7,260	28.4%
Black or Black British	4,420	17.3%
Chinese	800	3.1%
Other (including mixed race)	2,320	9.1%
Unknown/information refused	560	2.2%
<b>Total</b>	<b>25,520</b>	<b>100.0%</b>

## Geographic region

England	18,990	74.4%
Wales	90	0.4%
Scotland	60	0.2%
Northern Ireland	40	0.2%
Guernsey, Jersey and the Isle of Man	20	0.1%
Other EU	900	3.5%
Non EU	5,430	21.3%
<b>Total</b>	<b>25,520</b>	<b>100.0%</b>

Student numbers represent head count not FTE (full-time equivalent). All student number figures are rounded to the nearest 10. Total figures are also rounded to the nearest 10. The sum of numbers in a table may not match the total shown.

## Subject area

Medicine and dentistry	360	1.4%
Subjects allied to medicine	5,760	22.6%
Biological and sport sciences	740	2.9%
Psychology	780	3.1%
Agriculture, food and related studies	20	0.1%
Physical sciences	220	0.9%
Mathematical sciences	180	0.7%
Engineering and technology	1,980	7.8%
Computing	3,080	12.1%
Geographical and environmental studies	180	0.7%
Architecture, building and planning	230	0.9%
Humanities and liberal arts (non-specific)	110	0.4%
Social sciences	1,100	4.3%
Law	1,310	5.1%
Business and management	4,650	18.2%
Communications and media	200	0.8%
Language and area studies	190	0.7%
Historical, philosophical and religious studies	170	0.7%
Creative arts and design	2,150	8.4%
Education and teaching	2,020	7.9%
Combined and general studies	80	0.3%
<b>Total</b>	<b>25,520</b>	<b>100.0%</b>

## Students from outside the UK – Top 10 countries

India	2,560	10.4%
China	520	2.1%
Nigeria	500	2.0%
Pakistan	370	1.5%
Malaysia	210	0.9%
Portugal	200	0.8%
Ireland	110	0.4%
Bangladesh	100	0.4%
Spain	80	0.3%
Vietnam	70	0.3%
<b>Total</b>	<b>4,720</b>	<b>19.1%</b>

## Students studying wholly outside the UK

### Students on overseas franchise programmes

Malaysia	3,710
Russia [Russian Federation]	370
Singapore	210
Canada	180
Egypt	140
Other countries	240
<b>Total (students on overseas franchise programmes)</b>	<b>4,850</b>

Students on distance learning programmes outside of the UK (across 119 countries)	1,530
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<b>Total (students studying wholly outside the UK)</b>	<b>6,380</b>
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<b>Total student numbers</b>	<b>31,900</b>
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