# Rear of Burston Garden Centre, North Orbital Road, Chiswell Green, St. Albans –

## Draft Statement of Common Ground relating to Need PLANNING INSPECTORATE REFERENCE: APP/B1930/W/21/3279463

#### Areas of Agreement

It is agreed that there is an immediate unmet and growing need for extra care accommodation within the District. It is the extent of this need which is disputed.

The National Planning Practice Guidance confirms that the need for specialised accommodation is critical.

#### Areas of Disagreement

Appellant Position	LPA Position
Paragraphs 5.1 to 5.6 of Mr Appleton's Proof and Section Three of his appended Report.We invite the LPA to confirm that they agree the information contained in Mr Appleton Proof and Report.	The Council rely upon the projections in the South West Hertfordshire Local Housing Needs Assessment September 2020.
Paragraphs 6.1 to 6.4 of Mr Appleton's Proof and Section Four of his appended Report. We invite the LPA to confirm that they agree the information contained in Mr Appleton Proof and Report	The Council rely upon the older persons dwelling requirements in the South West Hertfordshire Local Housing Needs Assessment September 2020
Paragraph 8.2 of Mr Appleton's Proof and Section Five of his appended Report. We invite the LPA to confirm that they agree the information contained in Mr Appleton Proof and Report We invite the LPA to agree our tables in	The LPA offer no comment on this.  The LPA offer no comment on this.
relation to current supply as reflecting the most up to date position.	
We do not accept the projections of the The Southwest Hertfordshire Local Housing Needs Assessment of August 2020 believing the use of the methodology to be flawed and the outcome consequently an underestimate of current and future requirements.	The Southwest Hertfordshire Local Housing Needs Assessment of August 2020 and the LPA relies on the projections of need for specialised accommodation for older people contained therein.
Disagreement is around the scale of need and the likelihood of delivery to meet it within any reasonable timescale.	The information provided by the Committee Report is that there is a need for older peoples housing and therefore weight should also be given to the delivery of older peoples housing

The Appellant asserts that the passage of time and lack of progress in meeting the need acknowledged at the time of the earlier Appeal the provision of these units of Extra Care should be given Very Substantial Weight.	The previous Inspector gave very significant weight to the contribution that the original scheme would have made to meeting the needs for specialist housing for older people a similar degree of weight should be attributed to this benefit in this appeal, notwithstanding the removal of the care home. The Council agree with the weight given by the previous Inspector which was not dependent upon a precise resolution of the difference between parties and that the proper forum for determining the precise position is as part of the development plan process. The extent of the range of need advanced remains broadly the same as at the time of the previous inquiry.
Very substantial weight should be attributed to the contribution the development would make to meeting the needs for specialist housing in the area for older people	The identified need for extra care accommodation contributes to the weight in terms of overall housing need and that overall the benefits relating to general and C2 housing need weighs substantially in favour of the proposed development."

### Signatories:

Contact Consulting	GCPP
pp De Edde	S. J. Grewer.
Nigel Appleton	Shaun Greaves
On behalf of Appellant	On behalf of St Albans City and District Council
Date: 2 6/11/2021	Date: 26 November 2021.