

REAR OF BURSTON GARDEN CENTRE, NORTH ORBITAL ROAD, CHISWELL GREEN, ST. ALBANS

ADDITIONAL STATEMENT OF COMMON GROUND ON NEED

PLANNING INSPECTORATE REFERENCE: APP/B1930/W/21/3279463

1. An additional statement of common ground was requested by the Inspector.
2. The Council sets out a response to the first part of the Inspector's request:

"It is not clear why the Council seeks to rely on the South West Hertfordshire Local Housing Needs (LHN) Assessment (September 2020) and offer no comment on Mr Appleton's proof and report, or what figures the Council seeks to rely upon within the LHN Assessment"

3. Council's Response

- 3.1 The South West Hertfordshire Local Housing Needs Assessment (LHN) (CD 6.11) was produced by GLHearn in September 2020 on behalf of 5 Council's in Hertfordshire, including St. Albans City and District Council to assess the future development needs over the 2020-2036 period and in turn inform strategic and local planning activities. It considers the need for different types of housing and housing needs of different groups within the Southwest Hertfordshire Housing Market area and constituent authorities.
- 3.2 This document is considered up-to-date and is used as a basis for planning decisions. It forms part of the evidence base for developing the development plan. It responds to and is compliant with the Requirements of the Framework (2019) and is informed by the revised Planning Practice Guidance published in February 2019.
- 3.3 Regarding Housing Needs for Older and Disabled Persons there is projected to be a 44% increase in the population aged 65+ between 2020-2036. The approach in the LHN has been to use prevalence rates and apply these to the population growth of those aged 75 and over to get to a current and future need for a range of different care levels by tenure.
- 3.4 The LHN identifies that an ageing population means that the number of people requiring specialist accommodation and/or disabilities is likely to increase substantially in the future.

- 3.5 The calculated need (see 1.29) is broken down following paragraph 10 of the PPG which sets out different types of specialist housing:
- Age-restricted general market housing
 - Retirement living or sheltered housing
 - Extra care housing or housing-with-care
 - Residential care homes and nursing homes.
- 3.6 Section 7 addresses the housing needs of older people and disabled persons.
- 3.7 Table 78 sets out the population in 2017 for older people by age group and a population of 25,026 for 65+.
- 3.8 Population growth analysis is linked to the Standard Method housing need for the SW Herts projected increase in the Population of Older Persons is 44.2% for over 65s. Broadly the same patterns emerge for individual authorities.
- 3.9 Table 82 sets out the projected population of Older Persons (2020 to 2026) for over 65s of 37.7%. The lowest in the five council areas.
- 3.10 Table 3 of Mr. Appleton's report sets out the population over 65 in St. Albans as 25,600, this is the same as Table 82 of the LHN (25,609). The population change 65+ in 2036 (LHN 35,276) and in 2035 (Appleton 32,100) However, Mr. Appleton has a population over 85 of 6100 in 2035 and LHN of 6895. Therefore, the LHN projects a higher older population.
- 3.11 The LHN tenure profile at figure 19 for St Albans is 76.5% Owner Occupied (no mortgage) and 5.9% with mortgage = 82.4% Table 10 of Mr. Appleton's report breaks down different age cohorts and does not give a figure for those 65+ but the figures are similar overall.
- 3.12 Projections are made for extra care housing demand based upon prevalence rates by Mr. Appleton in his report and the LHN.
- 3.13 The LHN identifies at 7.48 that four sets of estimates of need have been used, three linked to the Housing LIN and one as taken from Housing for Older People Supply Recommendations (HOPSR) a databased developed by Sheffield Hallam University.
- 3.14 Mr. Appleton's report at tables 14 and 15, identifies current provision and a projection of advisable levels to meet need to reflect affordable and market housing for over 75s based upon prevalence rates of 15 and 30 per 1000 people respectively. The LHN has a ratio for over 75s of 16 (rented) and 13 (market) per 1000 of the population for St Albans (Table 92 CD6.11). These differences

in prevalence rates result in significant difference in overall predicted demand for extra care accommodation.

- 3.15 The position at the previous public inquiry (CD8.11.ii) was a need of 787 (appellant) v 437 (LPA) including affordable and market in 2035. The predicted shortfall of 667 (Appellant) v 276 (LPA) at that time.
- 3.16 The appellant now looks at projections for year 2040 and the LHN (CD 6.11, Table 92) for 2036.
- 3.17 Mr. Appleton's Report projects the need for extra care (affordable and market) as 815 in 2040 in table 15 (based upon an over 75 population of 18,100). The LHN identifies a total of need for 538 at Table 92 (current 205 +163) (additional to 2036 (95 + 75) = 538). There would be a predicted shortfall of 243 +175 = 418).
- 3.18 Therefore, in terms of need, the position at the previous Inquiry was 787 (appellant) v 437 (LPA) and shortfall 667 (appellant) v 276 (LPA) as projected at 2035.
- 3.19 The evidence to the present inquiry considers the need position at 2040 (Mr Appleton) and 2036 (LHN) rather than 2035. The identified need for both market and affordable/rented for these years is 815 (appellant) v 538 (LPA). The future shortfall identified by the Appellant is 695 and the future shortfall identified by the LPA is 418.
- 3.20 The respective figures are set out in the Table below.

Burston Nurseries – Extra care need calculations

	Appellant (2019 inquiry – CD 8.11ii)	Council (2019 inquiry – CD 8.11ii)	Appellant (2021 inquiry – Nigel Appleton's PoE)	Council (2021 inquiry – LHN Assessment 2020)
2020 need (affordable and market)	567	315	567 (Table 14: 189 + 378)	368 (Table 92: 205 + 163)
2020 shortfall (calculated by subtracting current provision of affordable and market from need)	447	154	447 (Table 14: 567 – (73 + 47))	248 (Table 92: 148 + 100)

Future need (affordable and market)¹	787	437	815 (Table 15: 272 + 543) ²	538 (Table 92: 368 + 95 + 75)
Future shortfall (calculated by subtracting current provision of affordable and market from need)	667	276	695 (Table 15: 815 – (73 + 47))	418 (Table 92: 243 + 175)

4. Appellant's Response

- 4.1 The Appellant's response to the to the second part of the Inspector's request is set out below.

"It is also not clear why the appellant considers the LHN Assessment's methodology to be flawed. The respective proofs of evidence do not assist greatly on these matters."

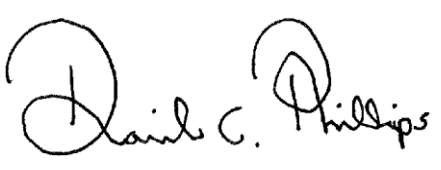
- 4.2 The LPA relies upon projections of current and future need for specialised accommodation for older people in St Alban's contained in the South West Hertfordshire Local Housing Needs (LHN) Assessment (September 2020). The appellant's position is that as these projections were arrived at using the SHOP@ Tool produced by the Housing Learning and Improvement Network they are flawed. Like all similar methodologies the SHOP@ Tool depends upon the input of assumptions about the appropriate level of provision for this style of specialised accommodation. In the case of the South West Hertfordshire LHN these assumptions are not disclosed, nor are they set out in Mr Greaves evidence. The Appellant's case is that the assumptions implicit in the figures contained in the LHN lead to outcomes that are artificially low and reflect current provision scaled for population growth rather than being reflective of need and policy drivers. We note that at the previous Inquiry a letter from the CEO of the

¹ For the 2021 inquiry, Appellant future need calculated to 2040; Council future need calculated to 2036. For the 2019 appeal, future need for both Appellant and Council calculated to 2035.

² Para. 1.10 of Nigel Appleton's PoE refers to a need for 507 additional market units in 2040. The figure given in Table 15 is 543.

Housing LIN, Mr Jeremy Porteous, was placed in evidence in which he explained that this was the principal reason why his organisation had withdrawn the tool from open use. These matters are referred to in Section 4 of Mr Appleton's Proof and at paragraph 10.13 of his appended report."

Signatories:

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pp 	
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On behalf of Appellant	On behalf of St Albans City and District Council
Date: 6 December 2021	Date: 6 December 2021