



Written Statement Responding to Inspector's Questions

Matter 5: Objectively Assessed Needs for Housing and Employment Land

Examination of the St Albans Local Plan 2020-2036

Prepared on behalf of CastleOak Care Communities

Respondent I.D: 1187716

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Matter 5: Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall provision for housing and employment land.

- 1.1. This Statement provides Castleoak Care Communities response to the Inspector's Questions relating to the approach to overall provision for housing set out in the Submission Stage Draft St Albans Local Plan.
- 1.2. This Statement should be read in conjunction with Castleoak's objections to the St Albans's Proposed Submission Local Plan consultation (17 October 2018). A number of principal objections were made in respect of housing need.
- 1.3. The broad thrust of the objections relate to the failure to identify sufficient housing land and that land at Burston Garden Centre, should be removed from the Green Belt and allocated to assist in addressing this.
- 1.4. Turning specifically to meeting the specific housing needs of the elderly St Albans has failed for many years to provide the housing its residents need: this is an area of sustained market failure. This is in clear conflict with para. 61 of the NPPF which states that:

“Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require older people ...”

- 1.5. Castleoak estimate that there is a current and future need for a further 2,449 extra care units and care beds. This is real people, in need of care now noting the combined current shortfall of 681 care beds.
- 1.6. There are no allocated sites. This means that the Council is entirely dependent on 'windfall sites'; it also means that the Council has no policy basis for requiring C2 provision as part of any housing schemes that do come forward. In short, the reality is that the Council has literally no idea where its next C2 unit is coming from.
- 1.7. The Local Plan, across all of its Broad Locations seeks to deliver a total of 500 beds and none at least before 2024/25 at the earliest. This is just 20% of actual need.
- 1.8. All that can be said with confidence is that the gaping and growing shortfall in existing elderly care provision will not be addressed by the Local Plan to any meaningful extent any time soon.
- 1.9. The Council should therefore be proposing to release sites from the Green Belt that are capable of being delivered immediately and within the first 5 years of the Development Plan.
- 1.10. The Castleoak site at Burston Garden Centre is considered to meet all of the attributes that would justify release from the Green Belt noting that development of the site for elderly persons housing would:
 - Address significant housing need (delivery of circa 189 care beds);

- Represent a redevelopment of a site that would not undermine the purposes of keeping land within the Green Belt;
- Represent development of a site well contained within the landscape, albeit noting its location close to a listed building; and
- Have associated socio, economic and environmental benefits.

Q1: *The identified housing need is based on the standard methodology in the National Planning Policy Framework. Is the Council's application of this in accordance with the methodology in the PPG (as updated)?*

- 1.11. For the reasons set out in paras. 1.1 to 1.8 above the Council has failed to make appropriate housing provision to cater specifically for the needs of the elderly. This is in clear conflict with paragraph 61 of the NPPF and guidance on making provision for the needs of the elderly set out in the PPG with specific reference to paras. ID: 63-004, 005, 006 and 007 20190626 and ID: 67-001-20190722.
- 1.12. Contact Consulting were commissioned by CastleOak to produce a report that provides evidence of the demand for extra care housing in St. Albans, October 2019 (copies are available to the Examination on request). In arriving at a forecast need, the report considers important market questions, including the health of the population, acknowledges that over 75% of older people own their home and also estimates future patterns of the provision for specialist housing for older people in the context of policy that supports increasing these forms of accommodation, at both local and national level.
- 1.13. The report includes a review of the South West Hertfordshire Strategic Housing Market Assessment (January 2016). The SHMA report identifies (Table 57) a supply of 823 units of specialist housing for older people in St Albans. Of these, 750 were sheltered housing and only 73 extra care units (all affordable, no market homes) were identified.
- 1.14. Table 58 goes on to project a need for an additional 1,352 units of specialist housing by 2036 to meet the expected population change over the period 2013-2036.
- 1.15. However, in terms of the actual, overall population of those aged 75+ in St Albans (19,350) there is a need (at 170 units per 1,000) for 3,272 units. Against a supply of 823 units, there is a very significant requirement for 2,449 units of specialist accommodation over the plan period. Clearly, not all of these should be extra care provision.
- 1.16. Table 59 predicts a need for an additional 640 care home bedspaces between 2013 and 2036. The report does go on to note that new forms of accommodation, such as extra care housing, could provide a 'middling' form of offer that, if promoted, could reduce the need for care home bedspaces.
- 1.17. Draft Policy L2 of the Submission Local Plan seeks to provide "at least" 500 bedspaces of C2 (residential care, nursing care and similar) to 2036. It also seeks to provide "at least" 250 bedspaces of 'similar' C3 use accommodation to 2036.
- 1.18. As such, the Council accepts there is a need for extra care and care homes. In addition, it is relevant that this need is expressed as a minimum, rather than a maximum.

- 1.19. For clarity Contact Consulting considered that the minimum figures in draft Policy L2 significantly underestimate the need for specialist housing for older people. It is not clear why the Council is only seeking to deliver part of the need identified in the SHMA report.
- 1.20. The Contact Consulting report also critiques the Older People Market Position Statement (Hertfordshire County Council, 2016). Page 22 of the document says that, taking into account existing provision (of 73 flexicare units), there is a need for an additional 174 flexicare units in St. Albans by 2020, and 250 units by 2030. (Nb; flexicare is akin to extra care).
- 1.21. The report has calculated this figure by applying a standardised ratio of 25 units per 1,000 population aged 75+. Or expressed another way, assumes that only 2.5% of people aged 75+ require extra care accommodation.
- 1.22. Compared to this, it is confirmed at page 17 that the population of those aged 65+ in St Albans is 20,941 and of these, 43% (9,090) live with “long term limiting illness or disability”.
- 1.23. There is a clear mismatch between the health and housing needs of older people in St Albans, and HCC’s calculated need for extra care accommodation. The reason for this is explained below.
- 1.24. As an authority, St. Albans Council supports extra care housing as a way of improving older people’s lives and providing more choice in the housing market. However, the scale of need is in dispute between the applicants and the Council. The difference essentially comes down to the fact that the HCC Market Position report excludes the need for ‘enhanced sheltered housing’ from the methodology, despite this being closely related to ‘extra care’ in the need to which it is intended to address and also relies entirely on a broad brush ratio, derived from the Housing LIN, for calculating need.
- 1.25. To summarise the differences:
 - The SHOP@ toolkit for calculating need relies on comparing existing provision to national ratios of provision. Low existing prevalence can therefore lead to projections of a continuing low need for provision. This is rightly recognised by Housing LIN as a perverse outcome.
 - The Housing LIN recommends that the appropriate prevalence ratio should be informed by local data, policies and priorities. For example, considerations such as average house prices and average house size in St. Albans and the fact that the overwhelming majority of older people in St. Albans are owner occupiers all suggest that the demand for private sale extra care housing in St Albans will be strong, and almost certainly higher than in many other areas on the UK.
 - The methodologies used by Carterwood and Contact Consulting reflects the publication ‘Housing in Later Life’ and the indicators of need and the aspirations of policy to provide an indicative pattern for provision.
 - Compared to the national average of 91 people per thousand aged 75 years who live in care homes, the ‘need ratios’ used by Carterwood and Contact Consulting appear to still be very low and cautious in their approach. The very different ratios between extra care and care homes serves to highlight the problem in projecting demand based on existing provision of a form of housing that is still relatively new to the UK.

- The SHOP@ tool is somewhat outdated in that it assumes that specialist accommodation may be less attractive to older home owners than to tenants of social rented property. In fact, extra care specialist housing is proving to be very popular for home owners looking to downsize and who understand the benefits that specialist housing and a sense of community bring as they age.
- Many local authorities are increasingly adapting their strategy for older people to encourage care in the community and emerging forms of specialist housing, including extra care housing. Thus, they are partly relying on active growth in extra care housing to help reduce social care costs.
- The above issues have been considered by an Inspector in the relatively recent West Malling planning appeal decision (APP/H2265/W/18/3202040, paragraphs 30 to 40).

1.26. Furthermore:

- Housing LIN confirms that it does not endorse any particular prevalence ratio
- Housing LIN advocates that relevant market data and evidence must inform the assessment of need for housing for older people
- SHOP@ is intended to be a tool, and not a rule
- Following concerns about the way in which the online SHOP@ tool has been misused, Housing LIN has withdrawn it from their offering, and instead offers consultancy services

1.27. In summary, the HCC Market Position report relies entirely on a pre-prescribed ratio that was derived from the Housing LIN to calculate need. But, Housing LIN is clear that this simplistic method represents mis-use of the SHOP@ tool.

1.28. The updated PPG states that “the need to provide housing for older people is critical”. It also requires LPA’s to plan to meet the housing needs of older people and to take a positive approach to schemes that propose to address this need.

1.29. Housing LIN has confirmed that it does not support the simplistic approach that the HCC Market Position report has taken in calculating the need for specialist accommodation for older people. Therefore it is considered that the ‘need’ figure set out in the HCC report is fundamentally flawed, and should be given no weight accordingly.

1.30. Frankly, in a context in which national planning says specialist housing for older people is “critical”, a conclusion whereby the HCC report finds that 43% of older people aged 65+ live with ‘long term limiting illness or disability’, but then goes on to recommend that extra care housing for only 2.5% of people aged 75+ is required only serves to demonstrate Housing LIN’s concerns over the misuse of SHOP@ as a rule and not a tool, and why it has now taken the decision to remove online access.

1.31. Castleoak’s position is that given highly relevant factors and market signals, including the demographic and socio-economic profile of St. Albans, house values, tenure structure and the growing popularity of extra care housing (both with occupiers and with government bodies to help ease social care costs) there are robust and convincing reasons to substantiate the applicant’s assessment of demand for extra care housing in St Albans.

Q2. Are any starting point LHN adjustments necessary?

1.32. No further comments to make.

Q3. Is the housing target in the Plan appropriately aligned with forecasts for jobs growth?

1.33. No further comments to make.

Q4. Is the stepped trajectory in policy S4 and appendix 2 of the Plan appropriate and justified?

1.34. Given the scale of housing need and the historic failure of the Council to meet its housing land supply dating back to 1994 CastleOak consider the stepped approach as not acceptable. The approach would not deliver sufficient homes early enough to counter worsening supply trends and would be contrary to government policy to boost the supply of housing as set out in the NPPF. Instead, the council must identify additional sources of housing delivery in the early years of the plan period.

Q5. How much housing is anticipated after the plan period as a result of the proposals in the Local Plan?

1.35. No further comments to make.

Q6. Have the Council set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations, as set out in paragraph 65 of the NPPF?

1.36. No further comments to make.

Q7. Have the Council carried out an assessment, as required by S.8 of the housing act 1985, of the needs of people in the district residing in caravans or houseboats?

1.37. No further comments to make.