



Written Statement Responding to Inspector's Questions

Matter 6: The Broad Locations for Development (Policy S6) – General Matters (Policy S6) and Strategy Infrastructure Policies (Policies L17 and L18)

Examination of the St Albans Local Plan 2020-2036

Prepared on behalf of CastleOak Care Communities

Respondent I.D: 1187716

Our ref: DP/JC/204884

11 December 2019

Matter 6: Whether the policies for the development and delivery of the Broad Locations for Development are justified, effective and consistent with national policy?

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 infrastructure needs of St Albans over the Plan period.

Whether it contains effective mechanisms to secure the provision of strategic infrastructure as and when it is needed.

- 1.1. This Statement provides Castleoak Care Communities response to the Inspector's Questions relating to the development and delivery of the Broad Locations for Development. It generally is broadly reflective of submissions made by other organisations at the Submission Stage of the 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 draft policies S6 (Broad Locations), L17 and L18 (Strategic Infrastructure).
- 1.3. The overriding concern is that the proposed development set out in the broad locations for growth is not consistent with national policy given the Council's approach to housing growth, and that there are concerns over whether the proposed older persons housing as set out within each of the broad locations can be delivered.
- 1.4. 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 in respect of Policies S1 and S2.
- 1.5. The Council through its Development Strategy accept that it cannot meet its future housing requirements noting that 81% of the land in the district is Green Belt. The district is relying on the release of land within the Green Belt to deliver most of its objectively assessed housing need of 14,608 dwellings (913 dwellings per annum) between 2020 and 2036. Accordingly, it has identified Broad Locations for Growth under draft Policy S6 to deliver circa. 10,085 dwellings through the delivery of large scale strategic urban extensions over the plan period i.e. circa 69% of its overall housing need with the balance of 4,523 to made up through the delivery of windfall sites.
- 1.6. Whilst Castleoak fully endorses the release of land within the Green Belt to meet future need, the strategy is fundamentally flawed because there is an over reliance on:
 - Large strategic site release with no evidence base to demonstrate that any of these sites are deliverable; and
 - 'windfall sites' to make up the shortfall.

- 1.7. In addition it is noted that the district is proposing to adopt a stepped approach to housing where it under delivers in the early years of the Plan and over delivers in the latter years; as follows:
 - 2020/21 to 2024/25 = 3,401 dwellings (680 dw/pa);
 - 2025/26 to 2029/30 = 6,006 dwellings (1201 dw/pa); and
 - 2030/31 to 2034/35 = 4,670 dwellings (934 dw/pa).
- 1.8. This equates to a total of 14,076 between 2020 and 2035 with an additional 795 dwellings to be delivered in the final year of the plan period 2035/36.
- 1.9. Even assuming adoption in 2020 the Council only expects about 600 new homes to be delivered on Broad Location for Growth sites before 2024/25.
- 1.10. There can be no justification for this approach noting that the fundamental tenant of housing delivery is to meet its 5-year housing land supply requirement.
- 1.11. 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.
- 1.12. 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.
- 1.13. 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.
- 1.14. 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.
- 1.15. 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.
- 1.16. 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.
- 1.17. 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: *How were the broad locations for development selected, and what evidence documents were produced to inform their selection?*

- 1.18. The Council's proposed allocation of the broad locations for development is predicated on the Council's approach that only a small number of large scale strategic developments should be allocated. As is explored within our Examination Statement for Matter 4, the Council's approach is not consistent with national policy. Moreover, for the reasons set out within our Examination Statement for Matter 3, the spatial strategy, which is derived from this approach, is also not justified or consistent with national policy.
- 1.19. There are also concerns over the approach to the delivery of older persons housing (specifically C2 use) over the plan period and the use of the broad locations to achieve this. For the reasons set out within the Examination Statement for Matter 3, it is our considered opinion that the spatial development strategy set out in the Local Plan significantly underestimates the level of C2 bedspaces required over the plan period (due to evidence of need including the Council's own Strategic Housing Market Assessment), with a minimum requirement of only 500 such bedspaces set out in the plan.
- 1.20. To compound this, the Plan takes a generic approach to the delivery of this need, stating that '50+ C2 Residential or Nursing care home' to be delivered in each of the following broad locations:
- Policy S6 i) - East Hemel Hempstead (North) Broad Location
 - Policy S6 iii) - East Hemel Hempstead (South) Broad Location
 - Policy S6 iv) - North Hemel Hempstead Broad Location
 - Policy S6 v) - East St Albans Broad Location
 - Policy S6 vi) - North St Albans Broad Location
 - Policy S6 xi) – Park Street Garden Village Broad Location
- 1.21. Combined, these broad locations would have a requirement to deliver a minimum of only 250 C2 bedspaces (and 400 C3 older persons dwellings) within the Plan period between them. Whilst it is acknowledged that some of the need for new older persons care accommodation would come forward as windfall sites, these figures fall significantly short of the needs identified within the Council's own assessment (which are themselves significantly short of CastleOak's assessments).
- 1.22. Our consideration of housing delivery is set out within the Examination Statement responding to Matter 8. In summary there are concerns whether the minimum levels of C2 bedspaces would be delivered in the broad locations as indicated above. The Council have produced no evidence to demonstrate that it has engaged with the care industry in order to justify the proposed allocations.

- 1.23. CastleOak, as specialists in the care and older persons housing industry has significant concerns that this approach is too simplistic and ignores the commercial factors which will affect the delivery of this form of development, particularly in respect to care homes. Given the nature of care homes, there is a high turnover of residents, and therefore these facilities must take a commercial approach to selecting locations, requiring good access to staff and needing to be positioned in relatively visible locations. Care home operators are also selective about micro-locations, so for example more than one operator will typically not locate in one place, because this creates competition risks.
- 1.24. For the above reasons, in CastleOak's experience and judgement it is highly likely that some of the broad locations above may come forward at the planning application stage without the C2 care bed element. It is therefore held that the above draft broad location allocations are not appropriate or effective, as required by national planning policy.
- 1.25. Rather than advancing on the existing approach to allocating C2 care beds solely within the broad locations (an approach which is flawed), we would suggest that the new Local Plan should proactively identify and allocate specific sites for the delivery of specialist C2 accommodation for older people. The CastleOak Site at the Burston Garden Centre would comprise one such opportunity and has been identified by CastleOak to be an appropriate and viable location for a new care community, and in CastleOak, has a committed developer.
- 1.26. As indicated previously, the actual minimum level of C2 bedspaces to be provided should be increased significantly to align with a robust evidence base, and be set out within the spatial strategy (see the Examination Statement for Matter 3 for further details).

Q2: *Have landscape, agricultural land, flood-risk, natural heritage and heritage assessments has been carried out to inform the locations of the proposed broad locations?*

- 1.27. No. The Council has produced no evidence on this.

Q3: *Is the Sustainability Appraisal of the options for the broad locations robust?*

- 1.28. No. See response to question 3.

Q4: *Are the locations of the proposed broad locations adequately identified on the policies map? Should they be more clearly defined?*

- 1.29. No. They should be more clearly defined.

Q5: *What are the anticipated timescales for the proposed masterplans? What form will these take? Are they being progressed alongside the Local Plan?*

- 1.30. Not known.

Q6: *Should the Broad Locations East and North of Hemel Hempstead be considered comprehensively as one broad location?*

- 1.31. No further comments to make.

Q7. In allocating larger scale sites have the Council considered the advice in paragraphs 72 a-d of the NPPF? If so where can we find the evidence to support this?

1.32. No. The Council has produced no evidence on this.

Q8. What strategic infrastructure is necessary for the Plan to be implemented? Is this clearly set out in a policy/policies in the Plan? If not, should it be?

1.33. No. The Council has produced no evidence on this.

Q9. Have the infrastructure requirements of the broad locations and other strategic infrastructure been adequately identified and costed in an up to date IDP?

1.34. No. The Council has produced no evidence on this.

Q10. Are any infrastructure requirements missing?

1.35. Not known.

Q11. Are there known sources of funding, particularly for development expected to be delivered in the next 5-7 years of the Plan? Are these all in the Council's latest Infrastructure Delivery Plan?

1.36. Not known.

Q12. Is there evidence that the infrastructure requirements will be delivered within the necessary timescales?

1.37. No. The Council has produced no evidence on this.

Q13. Should policy S6 make more specific requirements as regards the provision and timing of the infrastructure needs for the proposed broad locations?

1.38. Yes.

Q14. Are there effective mechanisms in place between the Council, other neighbouring authorities and infrastructure providers to co-ordinate the planning and provision of infrastructure?

1.39. Not known.

Q15. Will the broad locations for development have any potential cross boundary transport impacts? How will these be addressed?

1.40. Not known.

Q16. Is any of the strategic infrastructure reliant on other development coming forward in neighbouring authorities?

1.41. Not known.

Q17. Will the delivery of key infrastructure allow for the delivery of planned development in line with the housing trajectory in the Plan? If not, what will be the shortcomings and how will the Council address these matters?

1.42. Not known

Q18. Are there any other constraints on the delivery of strategic infrastructure?

1.43. Not known.

Q19. What are the implications of allocating the site of the approved Strategic Rail Freight Interchange at Park Street Garden Village for housing? Can an alternative site be provided? What are the wider cross boundary/national consequences of the Interchange not being delivered there?

1.44. Not known.

Q20. In response to our initial question – ‘Have the Council undertaken a whole plan viability assessment of the submitted Plan to ensure that the policies are realistic and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan? If so, can you direct us to it please?’ the Council replied ‘Yes, the St Albans CIL and Viability Report Final Draft – November 2017 (INFR 009), submitted on Friday 26th March 2019, assessed the viability of the emerging Local Plan....The assessment included looking at the cumulative cost and impact of the proposed (and now in similar form final) draft Plan.’

Has the economic viability of each of the proposed broad locations been adequately demonstrated in the St Albans CIL and Viability Report (Nov 17)? Is the study robust and does it demonstrate that the local Plan is viable and based on reasonable assumptions?

1.45. Not known.