



Written Statement Responding to Inspector's Questions

Matter 8: The Supply and Delivery of Housing 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 8: Whether the approach towards the supply and delivery of housing land is justified and effective and consistent with national planning policy.

- 1.1. This Statement provides CastleOak Care Communities response to the Inspector's Questions relating to the Council's approach to the supply and delivery of housing land. 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 to housing supply.
- 1.3. The overriding concern is that the proposed approach 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 supply.
- 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 to the specific housing needs of the elderly, St Albans has failed for many years to provide the housing its residents need.
- 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 C2 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 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.
- 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. Land such as that at the Burston Garden Centre should be allocated to assist in addressing this in respect of policies S1 and S2.
- 1.17. The Burston Garden Centre site 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: What is the estimated total supply of new housing in the plan period and how does this compare with the planned level of provision?

1.18. For the LPA to respond.

Q2: What is the estimated total supply in the plan period from:
a) Existing planning permissions?
b) Other commitments e.g. sites subject to S106 agreements?
c) Proposed site allocations?
d) Other sources?

1.19. For the LPA to respond.

Q3: Can the Council please provide a graph to show the housing trajectory and also a clearer, simpler table than that in appendix 2 of the Plan.

1.20. For the LPA to respond.

Q4: Is the housing trajectory realistic?

1.21. No. Please refer to paras. 1.1 to 1.18 above.

Q5: The majority of the proposed housing will be provided on a small number of large sites. Does the Council have a contingency Plan should one or all of these sites not deliver as expected?

1.22. With reference to para. 1.5 above the Council is placing an overwhelming reliance on releasing a small number of strategic sites and 'windfall sites' to meet its housing need.

1.23. This overwhelming reliance on a small number of strategic sites, coupled with the small margin of error means that there is significant risk that the Council will be unable to meet its development needs over the plan period. These large sites are reliant on significant infrastructure, and are notoriously hard to secure planning on and slow to deliver housing, particularly in early phases.

1.24. The NPPF is clear that the Local Plan must contain policies that are sufficiently flexible to ensure a constant supply of housing. Specifically, Paragraph 81(d) indicates that planning policies should be flexible enough to accommodate needs not anticipated in the plan, and to enable a rapid response to changes in economic circumstances. Paragraph 14(a) specifically states that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.

1.25. Consequently, it is held that the draft Local Plan conflicts with national policy, and significant amendments are required to the Plan.

1.26. CastleOak's preferred approach would be to amend the Plan so that it incorporates a mix of large scale strategic sites with a range of small and medium scale site allocations within the urban areas and edge of settlement locations. This would reduce dependency on these large scale sites, thereby enhancing the deliverability and ensuring supply is maintained throughout

the plan period. The CastleOak site at Burston Garden Centre site is available, achievable and deliverable within a short time period.

Q6: *Has there been persistent under delivery of housing? In terms of a buffer for a five year supply of housing sites, should this be 5% or 20% in relation to para 73 of the NPPF?*

- 1.27. There has been a persistent under-delivery of housing in the district, and a 20% buffer should be applied.

Q7: *What are the implications of stepped delivery of housing on the supply and delivery of housing?*

- 1.28. The Council's proposed stepped delivery approach, as presented at Appendix 2 of the publication draft Local Plan sees the Council continue to deliver a shortfall within the first five years of the plan, before stepping up significantly within the 5 – 10 and 10 – 16 year periods.

- 1.29. National Planning Practice Guidance indicates that stepped requirements will need to ensure that planned housing requirements are met fully within the plan period. Given the aforementioned concerns in respect of the reliance on a small amount of large scale sites, this is of particular relevance. National Planning Practice Guidance goes on to state (in respect of stepped delivery) that where there is evidence to support a prioritisation of sites, local authorities may wish to identify priority sites which can be delivered earlier in the plan period. As indicated previously, a more diverse mix of allocations would enable the Council to meet this criteria to a much greater extent, ensuring delivery is more balanced across the plan period, and not weighted heavily toward the end of the plan, as it is now. The CastleOak site at Burston Garden Centre site is available, achievable and deliverable within a short time period.

Q8: *What impact will this have on the 5 year supply of deliverable housing land and the delivery of affordable housing?*

- 1.30. As indicated above, the Council's proposed stepped delivery approach would result in the Council not being able to demonstrate a five year housing land supply against its requirements within the first five years of the plan. This is in the context that the Council has already been culpable of a consistent under-delivery against its needs – as at 2017/18 the Council could only demonstrate a housing land supply of 2.2 years. During 2018-19 a total of 624 net dwellings were constructed se against an annual target of 913 dwellings per annum. The Council's housing land supply has therefore reduced further.

- 1.31. The implications of not providing enough housing (and affordable housing) are significant. It would contribute to incremental price rises and increase homelessness. Not only is this an issue over the plan period, but there is also the backlog from the previous plan period to consider.

- 1.32. In terms of older persons housing, there is an existing pressing need which is only set to increase further. The Council's own outdated 2016 SHMA indicated a need for:

- Specialist Housing for Older Persons (within C3 use class) of 1,352 over the period 2013 – 2036, an annual need of 59 dwellings. Over the 16 year plan period this equates

to a minimum requirement of 944 (notwithstanding issues of past undersupply and need from neighbouring districts); and

- Registered Care Provision (within C2 use class) which total 640 'bedspaces' over the period 2013 – 2036, an annual need of 28 dwellings. Over the 16 year plan period, this equates to a minimum requirement of 448 (again, notwithstanding issues of past undersupply and need from neighbouring districts).

- 1.33. Separate care needs assessments carried out on behalf of CastleOak show a higher level of need than this still. Further details are set out in our Examination Statement for Matter 3.
- 1.34. In the above context it is particularly concerning that the level of need for C2 bedspaces identified within the SHMA not reflected in the Local Plan. Moreover, the actual allocated projects in which this accommodation is due to be delivered (within some of the broad allocations) are not due to be delivered until 2022/2023 at the very earliest, with the majority of the output of these projects being delivered within the late 2020s and early 2030s.
- 1.35. 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.
- 1.36. For the above reasons, in CastleOak's experience and judgement it is highly likely that at least some of the broad locations above would come forward at the planning application stage without the C2 care bed element.
- 1.37. We therefore have significant concerns that the delivery of the C2 bedspaces could be delivered as envisaged within the broad locations as indicated in the Plan. In any case, there are no allocations for C2 bedspaces set out within the Local Plan until the broad allocations are projected to be delivered. Even then there is nothing to indicate that the C2 element would be brought forward early within these projects. This is in the context of a pressing need for care beds and a growing national social care crisis.

Q9: On the basis of the Plan as submitted, is it realistic that it would provide for:

a) A supply of specific deliverable sites to meet the housing requirement for five years from the point of adoption?

b) A supply of specific, developable sites or broad locations for growth for years 6-10 from the point of adoption?

If you contend that the Plan would not provide for either (a) or (b) above (or both) could it be appropriately modified to address this?

- 1.38. Due to significant lead-in times associated principally with the need to delivered substantial infrastructure in advance, the Council has not provided any evidence to demonstrate that any of these sites will make a meaningful contribution to housing land supply within the next five

years. For the reasons set out previously (specifically in respect of CastleOak's expertise as specialists in the care and older persons housing industry) we also have significant concerns over the delivery of the C2 elements within the broad locations for development.

- 1.39. In order to reduce risk and seek to enhance housing land supply within the five year plan period, we suggest the Plan be modified significantly to allocate a more diverse mix of sites including some deliverable in the short and medium term. We would also propose the allocation of some sites specifically for the provision of C2 bedspaces. The CastleOak site at Burston Garden Centre is available, achievable and deliverable within a short time period, for delivery of C2 accommodation. It has significant local support for such development, and is allocated within the draft St Stephens Neighbourhood Plan (Draft Policy S20).

Q10. In overall terms would the Plan realistically deliver the number of dwellings required over the plan period?

- 1.40. For the reasons set out earlier in this statement, we have significant reservations that the level of housing growth set out in the Local Plan could be delivered.
- 1.41. Since adoption of the District Local Plan Review 1994, the District has delivered an average of 360 net dwellings each year. This has been consistent for each 5, 10 and 15 year period and demonstrates that the Council has never managed to deliver the supply of housing against its targets.

Q13. Is the type and size of housing provided/planned meeting/likely to meet the needs of the area?

- 1.42. CastleOak has particular comments in respect of the Council's approach to the provision of older persons housing as set out earlier in this statement. Moreover, detailed comments in respect of the level of C2 accommodation set out in the Plan are set out in our Examination Statements for Matters 3 and 5.
- 1.43. Paragraph 61 of the NPPF states that:

"...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 affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)".

- 1.44. CastleOak in principle welcomes the inclusion of a minimum requirement for C2 care accommodation over the Local Plan period as set out at Draft Policy L2. However, it is held that the level of housing would not be at the required level.
- 1.45. In respect of the above levels of need identified by both the Council and Carterwood, Policy L2, which indicates a minimum of 500 C2 bedspaces and 250 C3 older persons dwellings within the plan period is inadequate. Moreover, these allocations are very generic, typically allocating

'at least one 50+ bed C2 Residential or Nursing care home, at least one 50+ home C3 Flexi-care scheme' as part of the broad allocations.

- 1.46. For the reasons set out previously, CastleOak, as specialists in the care and older persons housing industry has significant concerns that this approach is too simplistic and ignores commercial factors affecting the delivery of this form of development. Consequently, rather than advancing on the existing flawed approach, we suggest that the new Local Plan should proactively identify and allocate specific sites for specialist accommodation for the elderly. The CastleOak Site at the Burston Garden Centre would comprise one such opportunity.

Q14. Is there sufficient variety in terms of the location and type of sites allocated?

- 1.47. For the reasons above, it is held that there is not sufficient variety in terms of location and types of sites allocated. The specific allocation of sites for older persons housing (rather than relying on the broad allocations) would significantly enhance the deliverability of C2 bedspaces. The Burston Garden Centre site is deliverable and achievable, and is being promoted by CastleOak through the Local Plan and planning application process. This land is achievable and deliverable within a short time frame, and will address an immediate need for C2 bedspaces.