

25 January to 5pm 8 March 2021
'Call for Sites 2021' Site Identification Form

St Albans City and District Council is in the process of preparing a new Local Plan 2020-2038. The 'Call for Sites' is an early opportunity for individuals, landowners and developers to suggest sites within the District for development over the next 15-20 years. The site suggestions received by us will be used to inform the preparation of the new Local Plan 2020-2038.

You are invited to put forward any new sites that you would like the Council to consider in its Housing Economic Land Availability Assessment (HELAA). These should be capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more). The Council will take account of the Strategic Housing Land Availability Assessment (SHLAA) submissions previously received since 2009 and therefore there is no need to resubmit these unless circumstances have changed. Sites from previous SHLAAs will form part of the Council's assessment. Proposed land uses can include:

- Housing
- Gypsy & Traveller Housing
- Mixed Use
- Employment
- Renewable and low carbon energy and heat
- Biodiversity Improvement / Offsetting
- Green Belt Compensatory Land
- Land for Tree Planting
- Other

To enable sites to be mapped digitally, please provide GIS shapefiles of your site, where possible.

The consultation period runs for six weeks between Monday 25 January to 5pm on Monday 8 March 2021.

Unfortunately, we cannot treat any of the information you provide as confidential.

It is important to note that not all sites received through the 'Call for Sites' will be appropriate for consideration as part of the Housing Economic Land Availability Assessment (HELAA). As a general rule:

We encourage you to submit sites that are likely to become available for development or redevelopment between now and 2038.

Please do not submit sites that:

- Are already included as a housing allocation in the St Albans District Local Plan Review (November 1994) – i.e. sites that are listed in 'saved' Policies 4 and 5.

- Have already been submitted to the Council for consideration via previous 'Call for Sites' and Strategic Housing Land Availability Assessment (SHLAA) processes (unless information is updated/changed).
- Already have planning permission for development, unless a new and different proposal is likely in the future; or
- Are situated outside St Albans City and District's administrative area.

If you wish to update information about a site previously submitted please complete the form below.

Please return the **form and site location plan** to the Spatial Planning and Design Team. We strongly encourage digital submissions via our online portal.

By online consultation portal:

<http://stalbans-consult.limehouse.co.uk/portal/>

By e-mail to: planning.policy@stalbans.gov.uk

By post to: St Albans Council Offices, St Peters Street, St Albans, Hertfordshire, AL1 3JE

Due to COVID-19; offices being shut and officers working from home; submissions by post are discouraged.

| Your Details | |
|----------------------|--|
| Name | Sophia Thorpe |
| Company/Organisation | RPS |
| Address | 20 Western Avenue, Milton Park, Abingdon, Oxfordshire |
| Postcode | OX14 4SH |
| Telephone | |
| Email | |
| Your interest | <input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other |

| Site Details | | | |
|---|--|-----------|--------------------------|
| Requirements: | | | |
| <ul style="list-style-type: none"> • Delivers 5 or more dwellings or; • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) | | | |
| Site address/location (Please provide a map showing the site boundary) | Land between 84-108 Ragged Hall Lane, Chiswell Green, St Albans, AL2 3NP | | |
| Site area (in hectares) | 0.72ha | | |
| Coordinates | Easting | 51.730405 | Northing -0.36362 |
| Site Location Plan Attached | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| GIS mapping shapefile attached (in .shp file format) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | |
| Landownership (please include contact details if known) | C/O agent | | |
| Current land use | Grazing paddock | | |
| Condition of current use (e.g. vacant, derelict) | Maintained grazing paddock | | |
| Suggested land use | <input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input type="checkbox"/> Other (please specify) | | |
| Reasons for suggested development / land use | The land is an available, deliverable and achievable greenfield site which is located adjacent to existing residential built form. The site is unconstrained and ideally located to provide much needed market and affordable housing within this existing residential setting. | | |

| | |
|---|--|
| Likely timescale for delivery of suggested development / land use | <input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years |
|---|--|

| | | |
|------------------|---|--|
| Site Constraints | Contamination/pollution issues (previous hazardous land uses) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Environmental issues (e.g. Tree Presentation Orders; SSSIs) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Flood Risk | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Topography affecting site (land levels, slopes, ground conditions) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Utility Services (access to mains electricity, gas, water, drainage etc.) | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| | Legal issues (For example, restrictive covenants or ownership titles affecting the site) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable). |

| | | |
|-----------------|---|--|
| | Other constraints affecting the site | <input type="checkbox"/> Yes (If yes, please specify) <input checked="" type="checkbox"/> No The site is unconstrained with no known reasons why residential development could not be delivered on the site within the 0-3year window. |
| Planning Status | <input type="checkbox"/> Planning Permission Granted <input checked="" type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other <hr/> Please include details of the above choice below (for example planning reference numbers and site history) 5/2011/1685 – Erection of 5 detached dwellings with associated landscaping and parking. Refused. | |

Other comments

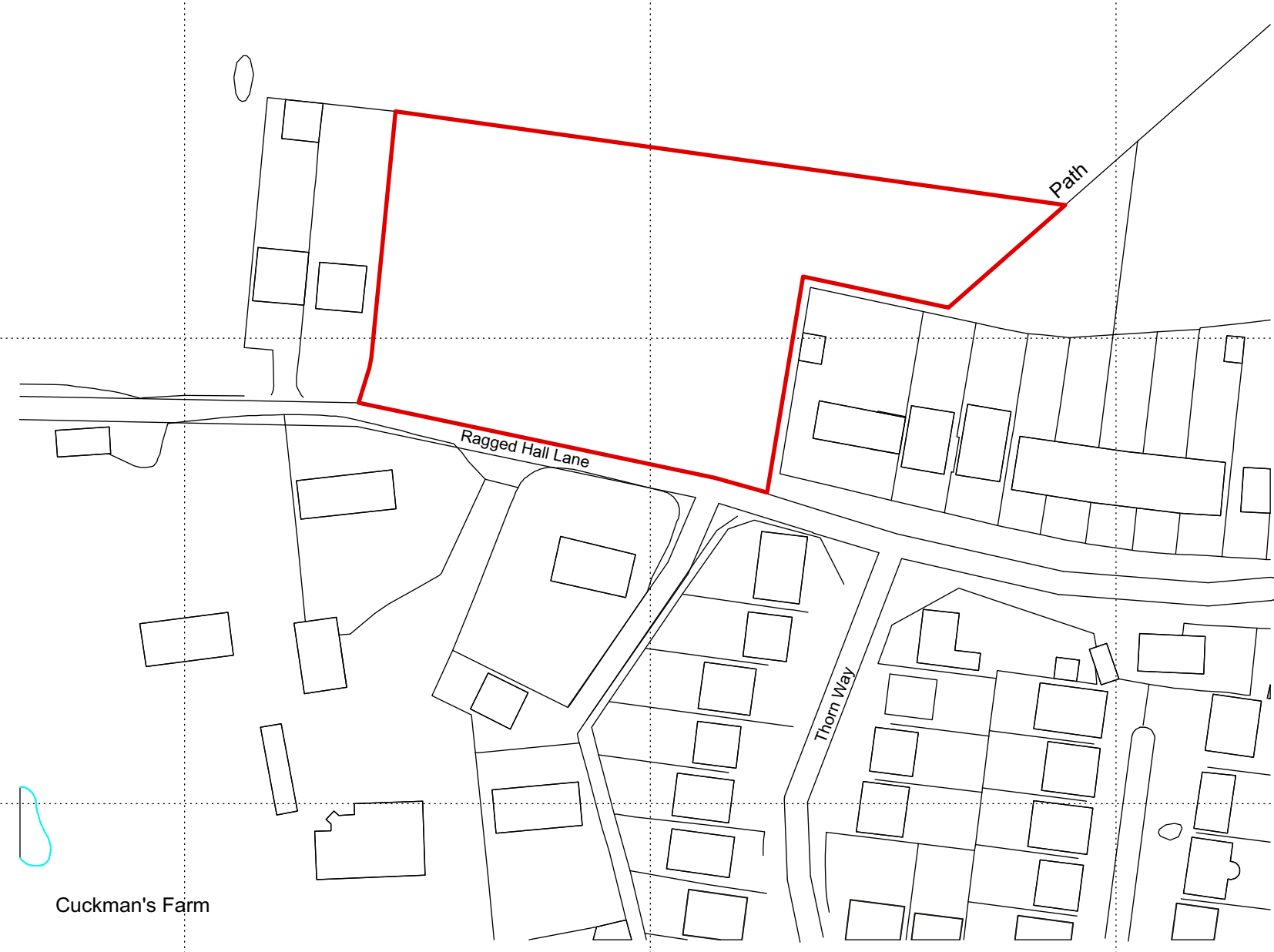
Please see covering letter

Notes

1. This drawing has been prepared in accordance with the scope of RPS's appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipients responsibility to print to correct scale. Only written dimensions should be used.

Legend

 Application boundary



| Rev | Description | By | CB | Date |
|-----|-------------|----|----|------|
| | | | | |



20 Western Avenue, Milton Park, Abingdon, Oxfordshire, OX14 4SH
T: +44(0)1235 821 888 E:

Client Sir Martin Holderness

Project East End of Ragged Hall Lane,
Chiswell Green,
St Albans, AL2 3NP.

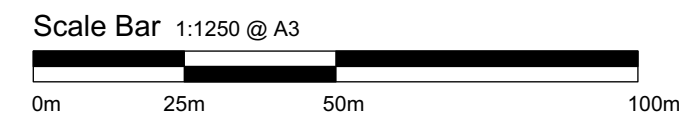
Title Site Location Plan

| | | |
|--------|----------|---------------|
| Status | Drawn By | PM/Checked by |
| FINAL | AJC | ST |

| | | |
|----------|------------|--------------|
| Job Ref | Scale @ A3 | Date Created |
| NPH12018 | 1:1250 | March 2021 |

| | |
|---------------------------|-----|
| RPS Drawing/Figure Number | Rev |
| 12018-0001-01 | - |

rpsgroup.com



Our ref: NPI 108 Ragged Hall Lane

20 Western Avenue
Milton Park
Abingdon, Oxfordshire
OX14 4SH
T

Date: 08th March 2021

Planning Policy
St Albans Council Offices
St Peters Street
St Albans
Hertfordshire
AL1 3JE

Dear sir/madam,

Call for sites submission – Land 84-108 Ragged Hall Lane, Chiswell Green

On behalf of our client, Sir Martin Holderness, we hereby submit the above mentioned site to the St Albans call for sites (SHLAA) consultation.

This covering letter should be read in combination with the completed call for sites proforma which provides a technical overview of the site to ensure the site is considered comprehensively as part of the present Housing Land Availability Assessment.

The land is put forward as an immediately available and deliverable site which has the potential to deliver approximately 15no. market and affordable housing as an infill development. The site forms the continuation of the street scene with existing residential development abutting the land to the east and west where it fronts Ragged Hall Lane.

The site has potential to provide a SHMA and affordable housing policy compliant mix of two storey homes within the context of an infill development. As part of the proposal the site has capacity to deliver local amenity land which could include a local area of play.

Planning policy

The current adopted Local Plan is The District Local Plan Review 1994 (Adopted 30 November 1994) Saved and Deleted Policies Version (July 2020). Any policies not on the saved policies list have time expired and no longer form part of the development plan. With St Albans recently withdrawing their new Local Plan from examination, the council has reverted to their old Local Plan thus placing a reliance on outdated policies from the 1990s.

Due to the reliance on out of date policies and assumptions for meeting housing growth and need, this therefore places further doubt on the delivery of adequate housing and forces development decisions to be based on this outdated Local Plan.

National Planning Policy Framework (February 2019)

The NPPF is the Government's statement of planning policy and guidance which provides the basis against which development plan policies and development control decisions should be made. The NPPF confirms

Our ref: NPI 108 Ragged Hall Lane

that the purpose of the planning system is to contribute to the achievement of sustainable development, and at its heart is a presumption in favour of sustainable development.

Paragraph 8 clarifies that in order to achieve sustainable development the planning system must act to reach overarching aims of social, economic and environmental objectives. Each objective is interdependent and need to be pursued in mutually supportive ways to secure net gains across all three objectives to achieve sustainable development.

Paragraph 11 advises that Plans and decisions should apply a presumption in favour of sustainable development. Section c) of paragraph 11 states that for decision-taking this means approving development proposals that accord with an up-to-date development plan without delay and, where the development plan is out of date, Councils should grant planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or the application of specific policies suggest otherwise.

Chapter 5 seeks to address delivering a sufficient supply of homes.

Paragraph 63 sets out that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site.

Paragraphs 60 and 61 indicate that housing need assessment must be carried out using the standard method in the national planning guidance and take into account the type, size, tenure and needs of different groups.

Paragraph 64 requires major development involving the provision of housing is proposed, decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement include where the site or proposed development is exclusively for affordable housing (criterion d).

Paragraph 67 requires policy making authorities to have a clear understanding of the land available in their area. From this assessment planning policies should identify a sufficient supply and mix of sites taking into account suitability and likely economic viability to identify a supply of deliverable sites for within 1-5 years of the plan period, and developable sites for years 6-10 and 11-15.

Paragraph 68 recognises the important contribution that small and medium sized sites can make to meeting the housing requirement of an area, and that these are often built-out relatively quickly.

Paragraph 73 requires local planning authorities to annually identify and update, as a minimum, a five-year supply of housing at specific deliverable sites, which meet the housing requirements set out in the adopted strategic policies. A suitable buffer for the housing supply must also be demonstrated, this being either:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the LPA wishes to demonstrate a five year supply of deliverable sites through an annual position statement; or
- c) 20% where there has been significant under delivery of housing over the previous three years (where delivery below 85% of the housing requirement set out in the Housing Delivery Test)

Paragraph 77 of the NPPF states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.

Paragraph 78 states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

In terms of rural housing, **Paragraph 78** states:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are

groups of smaller settlements, development in one village may support services in a village nearby.”
It is noted that the site is located adjacent to an area where residential properties already exist, alongside other, non-residential uses within the rural area. Therefore, there is clear potential for the proposal to help maintain and enhance the vitality of the local community through the provision of affordable, market housing on the site.

Paragraph 103 relates to sustainable transport modes and seeks the promotion of developments that are focused on locations which are or can be made sustainable and offer a genuine choice of transport modes. This aim goes hand in hand with the principles set under Paragraph 118d) which says that planning decision should “*promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively*”.

Paragraph 117 promotes the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Paragraph 118 criterion D develops this point by stating that planning policies and decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

Ensuring Housing Delivery and Land Supply

The NPPF requires Local Planning Authorities (LPAs) to maintain an up to date supply of housing land to be delivered over a 5-year period, this is known as 5 Year Land Housing Supply (5YHLS). It is apparent from the Council's updated Annual Monitoring Report (AMR) 2019 (March 2020) 5-year land supply requires the supply of **2,021 dwellings** during the period 2019-20 to 2023-24 which the Council is presently failing to meet, and therefore failing their obligations under the NPPF. The Councils 5-year housing supply is based on two separate methodologies, they are as follows:

‘Approach 1 - The Government’s consultation proposals within the ‘Technical consultation on updates to national planning policy and guidance method’ published on 26 October 2018, sets out a standard methodology for the calculation of local housing need. It gives an outcome for the District of an average of 896 new households / dwellings per annum;

Approach 2 - The 2014 based household projection figures were published by the Department for Communities and Local Government (DCLG) on 12 July 2016. They identify for the District a household projection, which can be taken as indicating local housing need of an average of 640 new households / dwellings per annum for the period 2019-2029.’

The Council updated its 5-year land supply schedule from using these methods and considered that at a baseline date of 1 April 2019 and including the relevant 20% buffer, there is approximately:

- 1) NPPF Standard Methodology: Five-year land supply at 896 new dwellings per annum + 20% Buffer = **1.9 years**
- 2) 2014-based ONS Household Projections: Five-year land supply at 640 new dwellings per annum + 20% Buffer = **2.6 years**

This housing supply reveals the severity of under delivery of housing within St Albans. The Council are unable to meet the required rate of delivery by a significant amount. Whilst a park home is considered sui generis under the Town and Country Planning Act ‘Use Classes Order’, their delivery can still contribute to the Council’s housing land supply. In our opinion, given that the proposal seeks the provision of housing, within the context of a recently submitted new Local Plan it is submitted that all further contributions to towards meeting the District’s inadequate 5YHLS should be considered beneficial to the Council to meet their housing supply whilst also working to address unmet need in the absence of any new housing allocations.

In addition to this, Housing Delivery Test Results were published by the Secretary of State on 19th February 2019. The Council scored 58% and in response to this, the Council has produced this Housing Delivery Test

Our ref: NPI 108 Ragged Hall Lane

Action Plan, responding positively to the challenge of increasing its housing delivery. This figure is considerably short of the 95% requirement and therefore showcases that there is a specific need to identify areas for housing.

However, the Councils LHNA states that the 'identified need for affordable home ownership properties equates to around 30% of the overall housing need' (4,043 per annum). In examining the cost for low-cost home ownership products, the preferred approach in this report is to set out a series of affordable purchase costs for different sizes of accommodation. These are set out in table 47 of the LHNA as a range with the bottom end being based on equivalising the private rent figures into a house price so that the market sale price will meet the needs of all households in the gap between buying and renting. The upper level is set based on the estimated lower quartile price to buy a market home. Setting higher prices would mean that such housing would not be available to households for whom the Government is seeking to provide an 'affordable' market option.

The LHNA sets out that for market housing, households currently have an element of choice but with worsening affordability, this causes families to buy smaller homes than they might traditionally have been expected to do. To give an example, paragraph 6.100 sets out that 'a middle-income household might previously have sought a 3-bedroom semidetached home. However, worsening affordability and stricter lending practice might now mean that such households will only be in the market for say a 2-bedroom flat'. With a limited amount of supply and a high demand for housing in St Albans this therefore shows the prevalent issue of market affordability and the effect of limited incoming housing supply may restrict residents from moving up the property ladder whilst economically active.

Based upon a review of the Councils own evidence base including the LHNA, there is clearly considerable potential in St Albans amongst existing households to downsize to smaller properties, when new smaller units are delivered thus releasing larger stock for families and other household looking to access a new home.

Suitability of the site

The site is being promoted to this call for sites consultation as an available, achievable and deliverable site for residential development in the form of approximately 15no. homes comprising a mix of market and affordable homes ranging in size to meet unmet housing need alongside associated landscaping and infrastructure. The site is positioned in a gap in the street scene between existing residential homes where it benefits from connectivity with all services and amenities to facilitate development. There are no constraints to delivery of housing on this site.

Although the site is not located within the defined settlement boundary, the site can meet much of the criteria set out in policy 4 (new housing development in towns) due to its location adjacent to the settlement boundary of Chiswell Green and proximity to St Albans.

It is recognised that the site is located outside of the confines of a named settlement in Policy 2 within the St Albans Local Plan; however, it is our view that the proposal for new homes on this sustainable edge of settlement site provides a suitable and deliverable location for the proposed dwellings in accordance with policies within section 3 of the Local Plan relating to housing by virtue of its pedestrian connectivity and access to bus services via nearby bus stops provides access to higher order services in larger towns including Luton, Watford and St Albans. As such, it is our view that this site should be considered favourably as part of this call for sites consultation as an available site to deliver market and affordable housing.

The existing connectivity with services and infrastructure within Chiswell Green offers residents access to multiple modes of sustainable travel, thus reducing their dependency on car journeys. Consequently, whilst being located outside of the settlement boundary, the location does allow access to sustainable modes of transport and pedestrian connectivity to local services within Chiswell Green to meet day to day needs, and further afield for higher order services.

The proposal are considered sustainable in terms of social, economic, and environmental benefits by making the efficient use of this sustainable site by delivering an attractive scheme comprising much needed smaller market affordable homes to meet an identified housing need in this infill site where the benefits of the scheme outweigh any harm to planning policies or the Green Belt.

Our ref: NPI 108 Ragged Hall Lane

In conclusion the site is located within a sustainable location adjacent to the settlement boundary with the capability to deliver much needed market affordable housing within the 1 – 5 year period of the Local Plan. The site is under single ownership and is immediately available to deliver much needed market and affordable housing. The site is demonstrable as an achievable and deliverable site for housing to meet the tests set out within the Local Plan.

Yours sincerely,
for RPS Consulting Services Ltd

Sophia Thorpe MRTPI
Director and Residential Lead - Planning

25 January to 5pm 8 March 2021
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- Have already been submitted to the Council for consideration via previous 'Call for Sites' and Strategic Housing Land Availability Assessment (SHLAA) processes (unless information is updated/changed).
- Already have planning permission for development, unless a new and different proposal is likely in the future; or
- Are situated outside St Albans City and District's administrative area.

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By e-mail to: planning.policy@stalbans.gov.uk

By post to: St Albans Council Offices, St Peters Street, St Albans, Hertfordshire, AL1 3JE

Due to COVID-19; offices being shut and officers working from home; submissions by post are discouraged.

| Your Details | |
|----------------------|---|
| Name | Anthony Aitken |
| Company/Organisation | Inspired Villages C/O Colliers International |
| Address | 50 George Street, London |
| Postcode | W1U 7GA |
| Telephone | |
| Email | |
| Your interest | <input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input checked="" type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other |

| Site Details | | | | | |
|---|--|----------|--|----------|--|
| Requirements: | | | | | |
| <ul style="list-style-type: none"> • Delivers 5 or more dwellings or; • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) | | | | | |
| Site address/location (Please provide a map showing the site boundary) | Centurion Club, Hemel Hempstead Road HP3 8LA | | | | |
| Site area (in hectares) | 10.5Ha (26 acres) | | | | |
| Coordinates | <table border="1"> <tr> <td>Easting</td> <td></td> <td>Northing</td> <td></td> </tr> </table> | Easting | | Northing | |
| Easting | | Northing | | | |
| Site Location Plan Attached | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | | | |
| GIS mapping shapefile attached (in .shp file format) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | | | |
| Landownership (please include contact details if known) | Centurion Club, Hemel Hempstead Road HP3 8LA | | | | |
| Current land use | Golf Club with associated infrastructure | | | | |
| Condition of current use (e.g. vacant, derelict) | Occupied for current golf club use, which totals 113Ha in total. Only 10.5ha is being considered for Inspired Villages proposal and balance of landholding will remain a golf course. | | | | |
| Suggested land use | <input type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input checked="" type="checkbox"/> Other (please specify) Retirement Village (Use Class C2 – Residential Institutions) | | | | |
| Reasons for suggested development / land use | Need for elderly living accommodation within the Council area. Suitable site close to existing amenities and services. | | | | |

| | |
|---|--|
| Likely timescale for delivery of suggested development / land use | <input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years |
|---|--|

| | | |
|------------------|---|--|
| Site Constraints | Contamination/pollution issues (previous hazardous land uses) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Environmental issues (e.g. Tree Preservation Orders; SSSIs) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Flood Risk | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Topography affecting site (land levels, slopes, ground conditions) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Utility Services (access to mains electricity, gas, water, drainage etc.) | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| | Legal issues (For example, restrictive covenants or ownership titles affecting the site) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable). |

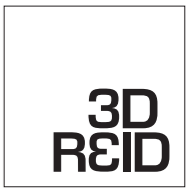
| | | |
|-----------------|---|---|
| | Other constraints affecting the site | <input type="checkbox"/> Yes (If yes, please specify) <input checked="" type="checkbox"/> No |
| Planning Status | <input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input checked="" type="checkbox"/> Other – Allocation in New Local Plan sought <hr/> Please include details of the above choice below (for example planning reference numbers and site history) | |
| Other comments | The landholding is occupied at present for a golf club use, which totals 113Ha in total. Only 10.5ha is being considered for Inspired Villages Retirement Village proposal and the balance of landholding will remain as golf course with its associated uses/infrastructure. | |



CENTURION CLUB

INSPIRED VILLAGES
EXISTING SITE PLAN

Drawing No. 200114-3DR-XX-DR-A-07001 Rev No. A Scale. 1:2000@A3



Our Ref
Your Ref

50 George Street
London
W1U 7GA

www.colliers.com/uk

MOBILE
EMAIL



08 March 2021

Head of Planning
St Albans City & District Council
Civic Centre,
St Peter's Street
St Albans
Hertfordshire AL1 3JE

Forwarded by e-mail only

Dear Sir/Ms

**St Albans Local Plan – Call for Sites
Centurion Club, Hemel Hempstead Road HP3 8LA – Inspired Villages**

We write on behalf of our clients, Inspired Villages who wish to highlight and advance a landholding to the St Albans 'Call for Sites' for the new Local Plan being prepared.

Inspired Villages, is a developer and operator of retirement communities in the UK. They are majority owned and fully funded by Legal & General. As the St Albans Local Plan is at an early stage in its preparation, a copy of 'Representation by Inspired Villages' is attached, which provides local authorities with recommendations for ensuring that their forthcoming Local Plan has specific policies to provide and deliver homes for older people. It is imperative that the Local Plan is shaped by early and effective engagement between plan makers and operators, as recommended by paragraph 16 of the NPPF. Local Planning Authorities must plan positively to meet the needs of older people. Indeed NPPG mentions this need is 'critical'. This is the only housing typology that is identified as being of such importance.

Inspired Villages believe that a 25/26 acre part of Centurion Club, which extends to over 280 acres in total, situated at the western extent of the St Albans District Council area, on Hemel Hempstead Road, can provide a suitable village with 185 homes and associated facilities. A plan is attached which indicates the area of interest to Inspired Villages, with a second plan detailing the context in relation to the remainder of the Club and wider area/landholdings.

There are no known infrastructure impediments to the development proceeding and the following points should be noted;

- Existing access road off A4147 provides an entrance to the site with good visibility
- No flood risk, contamination or adverse ground conditions identified

- Well contained site with existing tree buffers and mature landscaping in place
- Situated a short distance from both Hemel Hempstead and St Albans
- Key utilities/services available nearby
- The development proposal is considered to be commercially viable

As the landholding lies in particular close proximity to Hemel Hempstead in Dacorum Council area, there may be merit in considering this site as part of the St Albans Council 'duty to co-operate' planning discussions, with its neighbouring local authorities. Especially as the Local Plan preparation is in its infancy. The site lies in immediate proximity and adjacent to the Hemel Garden Community, as detailed in the attached plan.

The landholding has no distinct planning history for development of this type, scale or nature.

There are no site specific ecological, landscape or natural environment designations that would prohibit the Inspired Villages development at Centurion Club, each can co-exist alongside one another.

It is considered that as part of the Local Plan preparation that a Green Belt Boundary Study Review is required to fully evidence and justify alterations, as required by paragraph 136 of the NPPF. Inspired Villages request that this site is released from the green belt. The plan attached indicating the 25/26 acres for the Inspired Village development should be used to inform that study. If there are any further details or site specific information required from Inspired Villages to assist the study, then these can be provided, if requested. Inspired Villages are keen to engage with the Council collaboratively in seeking to meet the needs of the elderly in St Albans.

In terms of delivery, it is considered that from allocation in the St Albans Local Plan that the site could then secure planning approval and could be developed within the first five years of the new Local Plan period.

If there are any questions in relation to the Inspired Villages submission and supporting information to the St Albans 'Call for Sites', then please do not hesitate to contact us.

It will be appreciated if you can kindly acknowledge safe and timeous receipt of this letter and attachments.

Yours sincerely

Anthony Aitken BSc MRTPI
HEAD OF PLANNING

Representation by Inspired Villages

To support the practical delivery of much-needed specialist accommodation to meet the needs of an ageing population (version 2)

Inspired
Villages

The *best* years of your life?

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Foreword

We are not just getting older, we are living longer with rising health and care needs and by 2035, one in four of the population will be over 65 years old. With the unprecedented increase in the number of older people, a new approach is required to respond to the challenges of loneliness, isolation, unsuitable housing, unresponsive and rigid services.

We need to create environments where the chances of living well for longer, independently and actively are maximised, recognising the importance of social engagement and meaningful relationships to mitigate pressures on the health and social care system.

The planning system has struggled to keep up with the emerging models in the later living sector in recent years. This report is intended to assist local planning authorities with their development plan preparation to produce positive policies that will enable the housing needs for older people to be met, in full, particularly as such needs have been identified by the government's national planning guidance to be critical.

Legal & General entered the later living sector in the UK in August 2017, marking the first major institutional investment into this critically under supplied segment of the residential market. Legal & General are investing for the long-term with ambitious plans to deliver £4 billion of capital into the sector over the next five years, providing over 8,000 units of much-needed accommodation for older people and it is vital that the planning system can respond to the challenge.

Phil Bayliss, Chairman,
Inspired Villages and CEO of Legal & General Later Living

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Inspired Villages recommendations

Inspired Villages makes the following eight recommendations which should be incorporated into the emerging local plan to support the practical delivery of specialist housing for older people and meet the ever-growing need. The local plan and its evidence base should:

1. Be **based on a clear understanding of specialist housing for older people** drawing upon national guidance and other sources, particularly regarding the use class and recognise the different types of specialist housing which exist.
2. Be **based on a robust evidence base that identifies the housing requirements of specialist housing for older people** drawing upon appropriate sources recognised within the sector.
3. **Set out clear and specific policy / policies to address housing needs for older people** (e.g. care villages and extra care), on land in, or adjacent to settlement boundaries where those settlements that provide a certain level of services and facilities, where the proposed development provides sustainable transport measures and communal facilities and where there is an identified need.
4. **Set indicative figures or a range for the number of specialist housing for older people needed across the plan area throughout the plan period** and this must recognise the diverse models that exist.
5. **Monitor the delivery of housing for older people and deliver action plans to address under provision.**
6. Consider the **inclusion of specialist housing for older people within appropriate strategic or other site allocations** subject to consideration of need, site and locational factors and deliverability.
7. Must **recognise the significant benefits associated with specialist housing for older people** and this can inform planning decision making.
8. Set out different policy requirements, for example, affordable housing, for a retirement community (C2 use) compared to residential development (C3 use) and the evidence base and viability should take into account the different circumstances between the uses (e.g. retirement communities provide significant levels of communal facilities / non saleable floorspace and their ongoing maintenance and management, staffing, funding, etc). Where there is doubt, policies should provide sufficient flexibility for specific circumstances, which may include viability, to be assessed through a planning application.

Introduction

- 1.1 There is a significant existing shortage of suitable accommodation to meet the needs of the ageing population in the UK and the planning system must take positive measures to address this. The National Planning Policy Guidance (NPPG) identified that in mid-2016 there were 1.6m over-85s and this will double to 3.2m by 2041.¹ The majority of the ageing population are able to, and want to, live independently for as long as possible, and will not require intensive care home accommodation until much later in life, if at all. However, in this period older people will reconsider whether their home is most suitable for their current needs and are more likely to require increasing assistance with day-to-day tasks and managing their health. Accordingly, there is a need for a variety of types of specialist accommodation for older people, to meet the varying needs of individuals.
- 1.2 The coronavirus pandemic has brought into focus that the current system of older people remaining in unsuitable housing to meet their needs or care homes is not appropriate. A retirement community model addresses the deficiencies of the existing options, and this is an opportunity to provide appropriate homes for older people to allow them to age in place with access to care and facilities on-site to meet their day-to-day needs.
- 1.3 What is not clear is how these different types of development should be classified, **and delivered**, by the planning system. **There is no consistent approach to local plan policies looking to tackle this issue.** Some local plans might support the principle of the delivery of specialist accommodation for older people, but do not necessarily deal with delivery in a practical sense. An Irwin Mitchell report 'Unlocking potential for senior living' (July 2020) identified that

50% of Councils do not have any specific planning policies nor site allocations to make provision for housing for older persons. For example, South Gloucestershire Council's Core Strategy (adopted December 2013) Policy CS20 supports the provision of extra care accommodation which "*should be located so they are accessible to local facilities, proportionate in scale to the locality and provide ancillary facilities as part of the development.*" However, for retirement community operators searching for suitable accessible sites there will normally be competition with residential developers for allocated sites or, if not allocated, then usually this would be outside the settlement boundary and thereby there may be some degree of conflict with other development plan policies.

- 1.4 There has been an **inconsistent approach to plan-making and decision taking at a local level** across the country, which inevitably causes uncertainty for developers and operators within the sector, which results in delay to delivery and reduces investor confidence. The lack of specific local plan policies and misinterpretation of the Use Classes Order are particular issues.
- 1.5 Inspired Villages representation provides a developer / operator's perspective, to provide industry insight at an early stage in your plan-making process, which can be used to develop planning policies that are better placed to support delivery and in compliance with the objectives of the National Planning Policy Framework (NPPF) and the NPPG. Details of who Inspired Villages are and our model are set out in the accompanying **21st Century Care document**. This representation makes **8 recommendations** for the local planning authority to consider and to incorporate within your emerging local plan to ensure the delivery of much-needed older people's housing.

“There has been an inconsistent approach to plan-making and decision taking at a local level across the country.”

¹ NPPG Paragraph: 001 Reference ID: 63-001-20190626

Definitions of older people's housing and care

- 2.1 Since the late 1970s, accommodation for older people was generally limited to three options: remaining in the family home; moving into sheltered housing; or moving into a care home.² A large volume of sheltered housing was developed in the 1980s to 2000s, predominantly by McCarthy & Stone and registered providers of social housing. This stock forms the bulk of existing provision in the UK. In recent years there has been a considerable reduction in the availability of funding with spending falling in real terms,³ and local authorities seek alternative, more cost-effective means of providing care and accommodation for those who would otherwise be funded to move into residential care.
- 2.2 Furthermore, those who would otherwise fund their own care in a care home now seek alternative options to retain their independence for as long as possible. The opportunity to retain a level of equity from an existing home by moving at an earlier stage to specifically designed housing for older people from properties that are often larger and difficult to maintain, and where increasing levels of care can be bought in as required, can serve to delay or prevent a move into a care home.⁴
- 2.3 The government's '**Housing for Older and Disabled Guidance (2019)**⁵ set out four types of specialist housing to meet the diverse needs of older people and we also provide additional points from the Associated Retirement Community Operators (ARCO),⁶ who are the main body representing the retirement community sector in the UK, (in italics, below), with regards the size of schemes:

1 Age-restricted general market housing: Usually for people aged 55 and over. May include some shared amenities such as communal gardens but does not include support or care services.

2 Retirement living or sheltered housing: Usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. Does not generally provide care services but provides some support to enable

residents to live independently (may include 24-hour on-site assistance and a warden or house manager). The housing provided is available on a variety of tenures: shared ownership, long leasehold and rent (social and private). *Typically, 40-60 units.*

3 Extra care housing or housing-with-care (assisted living or independent living): Usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available, if required, through a registered on-site care agency. Residents can live independently with 24-hour access to support services and staff, and meals are also available. Often there are extensive communal areas, spaces to socialise or a well-being centre. In some cases, **these developments are known as retirement villages or retirement communities** – with the intention for residents to benefit from varying levels of care as time progresses. *Typically, 60-250 units. An Inspired Villages retirement community falls within extra-care housing.*

4 Residential care homes and nursing homes: Provide individual rooms (usually with en-suite) within a residential building, together with a high level of care (24-hour), meeting all activities of daily living. Also includes dementia care homes. Range of facilities and activities including gardens, lounges and dining rooms. *Sizes of homes vary considerably. Registered and regulated by the Care Quality Commission (CQC) in England, (by the Regulation and Quality Improvement Authority (RQIA) in Northern Ireland and the Care Inspectorate in Scotland and the Care Inspectorate in Wales (CIW)).*

2.4 Until recently, extra care or 'housing-with-care' was not widely recognised as providing an alternative to residential care. However, such accommodation maintains an individual's independence within their own specifically designed property with

² Jones, R (2007) A Journey through the Years: Ageing and Social Care. (Ageing Horizons) Issue No. 6, 42-51. Oxford Institute of Ageing

³ Bottery S, Ward D and Fenney D (2019) Social Care 360. The King's Fund

⁴ The University of Sheffield and Dwell (2015). Extra-care Housing: Brief development

⁵ Gov.UK (2019) Housing for Older and Disabled People

⁶ Associated Retirement Community Operators (ARCO) website: www.arcouk.org

a range of services and, importantly, where increasing levels of care can be bought in as needs change. Having evolved in recent years to respond to the growing demand from older people for greater choice, quality and independence, the number of models and designs have made it difficult to define this form of accommodation, however, the Care Services Improvement Partnership (2011)⁷ identified three common features:

- 1 A type of residential accommodation, a person's own home. It is not a care home or a hospital and this is reflected in its occupancy through ownership, whether it be lease or tenancy;
- 2 It is accommodation that has been specifically designed, built or adapted to facilitate the care and support requirements of its owners or tenants; and
- 3 Access to care and support is available 24 hours per day.

Recommendation One:
Local plans **must be based on a clear understanding of specialist housing for older people** and the Use Classes Order drawing upon the PPG and other relevant guidance.

- 2.5 Frequently local planning authorities overlook the extra care model, particularly the scale of a retirement community and instead focus on sheltered housing or care homes. It is essential that authorities recognise the different models.
- 2.6 Private extra care development in the UK broadly reflects the economic boom of the middle part of the 2000s. Between 2005 and 2009 there was an acceleration of development, particularly care villages. However, following the downturn in the residential housing market, the number of new, private extra care and care village developments reduced significantly from 2009. Such developments have increased again from the mid-2010s resulting from the ever-increasing ageing population.

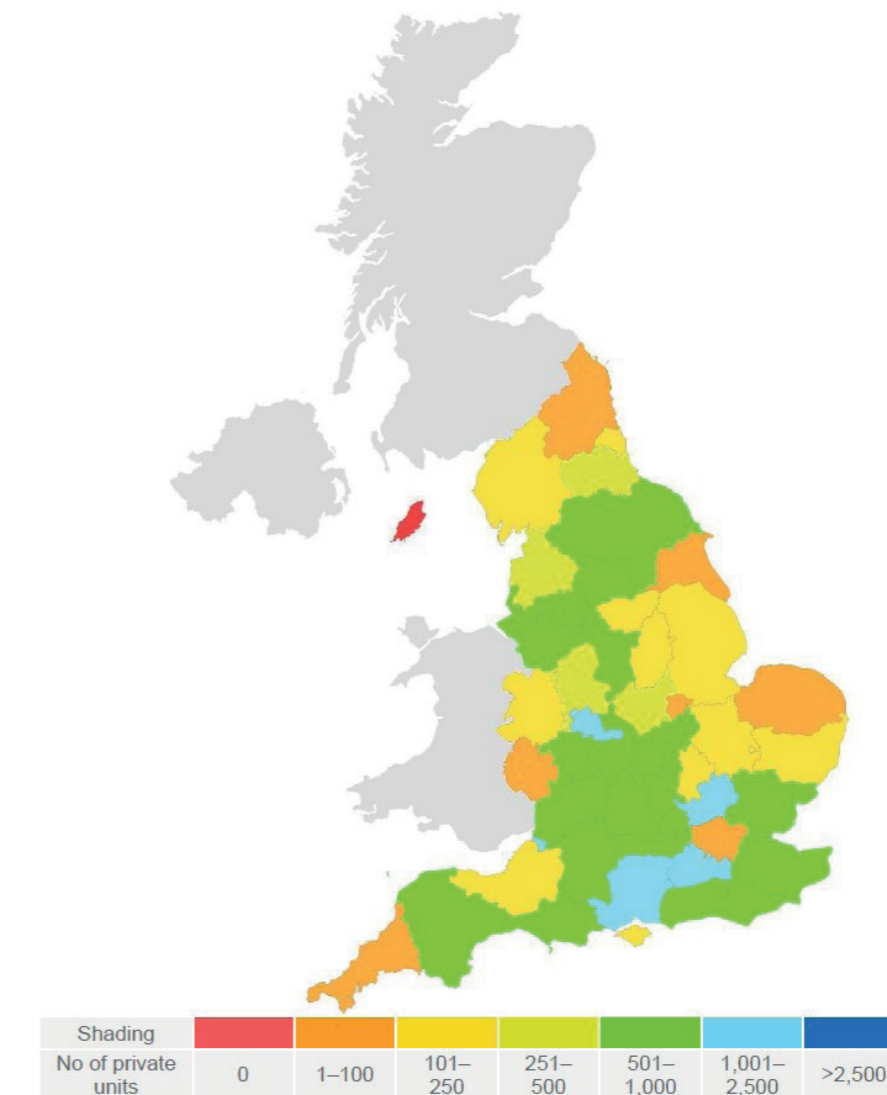
- 2.7 The average size of older people's housing developments has increased year on year, driven by larger village style developments and a requirement for economies of scale when providing on-site care and facilities.
- 2.8 It is important that a range of tenure types are provided for, to meet the housing need for older people. For the private sector, the decision to acquire or rent an extra care unit is choice driven, whereas in the affordable sector it is more likely to be based on need. For those choosing to acquire or rent a private extra care unit they should be able to choose the type of accommodation that best suits their circumstances and

consequently planning policy needs to support the delivery of housing types that meet the relevant local demand. For example, **in areas where there is high prevalence of home ownership, the policy should encourage higher rates of private extra care delivery to match tenure.**

2.9 Figure 1 below shows the geographic distribution by county in England of private older people's housing units where on-site care and facilities are provided. Overall it shows an historic low level of provision across England resulting in under supply and increasing needs.

Private older people's housing per county with on-site care and facilities

Figure 1



Source: Carterwood, EAC database May 2019.

Table 1

| Older people's housing by age of construction | | | | | |
|---|--------------|----------------|----------------|--------------------|---------------------|
| Decade | Schemes | Total units | Private units | % of private units | Average scheme size |
| Unknown | 487 | 11,701 | 9,384 | 5.4 | 24 |
| Prior to 1970 | 130 | 2,895 | 2,171 | 1.3 | 22 |
| 1970s | 50 | 1,405 | 948 | 0.6 | 28 |
| 1980s | 1,886 | 66,086 | 59,987 | 34.8 | 35 |
| 1990s | 864 | 30,018 | 26,418 | 15.3 | 35 |
| 2000s | 932 | 40,054 | 34,963 | 20.3 | 43 |
| 2010s | 1,079 | 52,632 | 37,107 | 21.6 | 49 |
| Forthcoming | 46 | 2,184 | 1,141 | 0.7 | 47 |
| Total | 5,474 | 206,975 | 172,119 | 100.0 | 37.8 |

Source: Carterwood, EAC database May 2019. (Note. EAC database includes all schemes, including private rental and 'other' tenure types, the latter making up a small proportion of total units. 'Unknown' schemes are likely to be older developments where no date of construction has been provided.)

⁷ The Extra Care Housing Toolkit https://www.housinglin.org.uk/_assets/Resources/Housing/Support_materials/Toolkit/ECH_Toolkit_Website_Version_Final.pdf

2.10 There are a variety of site size requirements dependent upon the operator, the proposed scheme and its location. They tend to range between 0.5 to 1.5 acres for more traditional sheltered housing schemes and care home schemes where a lower level of amenities is provided on site, up to approximately 10 acres for the more extensive, all-encompassing retirement community / extra care schemes.

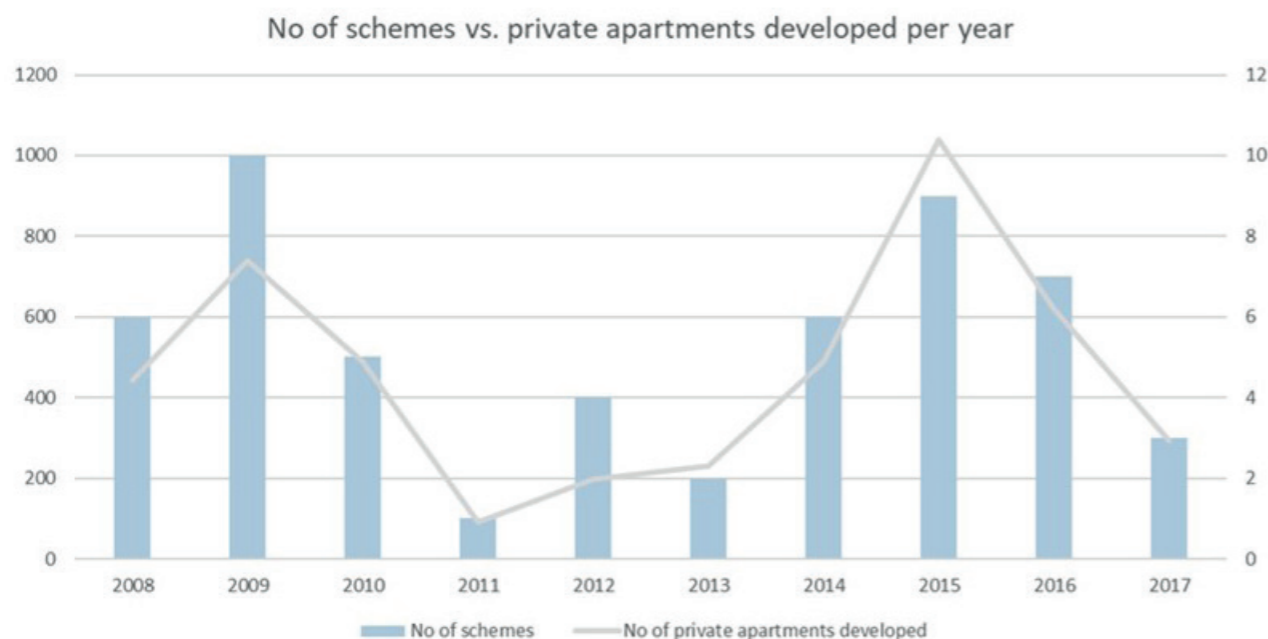
2.11 Despite strong sales rates and a demand that is tending to outstrip supply, the UK has only 4,535 private older people's housing schemes, including 124 care villages (based on the EAC definition of care village).⁸ Note: Care village is the same as a retirement community.

2.12 There have been fluctuations in new development during the ten years to 2017, as shown in table 2 below which compares the number of schemes developed against the number of private apartments. These developments are operated by, among others: Audley Retirement, Inspired Villages, Retirement Villages, Richmond Villages, Lifecare Residences, Fortis Living, The Extracare Charitable Trust, The Joseph Rowntree Housing Trust, MHA and St Monica Trust.

Recommendation Two:

The local plan **must be based on a robust evidence base that identifies the housing requirements of specialist housing for older people** drawing upon appropriate sources recognised within the sector.

Table 2



Source: Carterwood.

Deliverability and use class

2.13 Planning policies typically require there to be an identified need and for development to be proportionate to its surroundings. However, in terms of deliverability for a retirement community, for the communal facilities, funding and infrastructure needed to work as housing-with-care, which can sufficiently facilitate 'wellness' long-term, there is a **minimum scale that works financially and operationally.**

2.14 Inspired Villages typical model is for approximately 150 units of accommodation with some 210,000 sq.ft of floorspace, of which, approximately 40,000 sq.ft would be communal facilities (café / bar, restaurant, wellness centre including treatment rooms, fitness studio and pool, library, craft room and hairdressers – referred to as non-saleable space). Therefore, a development requires a certain minimum scale of development to be viable, whilst meeting the identified need. This means it is not realistic to disaggregate a retirement community into smaller amounts as it would not be viable to deliver.

Recommendation Three:

The local plan should **set out clear and specific policy / policies to address housing needs for older people (e.g. retirement communities / extra care):**

1. On land in, or adjacent to settlement boundaries where those settlements provide a certain level of services and facilities.
2. Where the proposed development provides sustainable transport measures and communal facilities.
3. Where there is an identified need.

2.15 Planning policies must be sufficiently flexible to take account of current identified need for older people's housing, assessed on a case-by-case basis, via each planning application. **The introduction of an exceptions-based policy will assist delivery of new retirement communities to meet the critical need.**

Use class

2.16 The key considerations in determining the use class for specialist older people's

housing is the level of care and scale of communal facilities provided.⁹ Indeed these are the key reasons why an elderly person chooses to move. A retirement community is not accommodation alone, they provide both 24-hour care and communal facilities, that enables individuals to live independently in their own home, with the security and amenities that allow for peace of mind. Such developments are C2 rather than C3 use, even when there is no registered care home as part of the development. This has been identified in recent planning appeals such as West Malling in 2018, amongst others.^{10 11 12} **LPAs seeking to wrap older persons housing into a general C3 use or applying affordable housing policy acts as a barrier to delivery.**

2.17 In July 2018, ARCO agreed without an evidence-based approach, the NPPF was right in recognising the need for a sufficient supply of housing for older people. ARCO stated that *'More work needs to be done, including clear guidance for councils to make provision for the different needs of older people. Without this there is a risk of the NPPF becoming a blunt instrument which fails to make a difference to planning decisions'* and supported a *'more explicit statement that C2 use classes include genuine housing with care developments.'* Inspired Villages are an ARCO Approved Operator and adhere to their Consumer Code which provides a benchmark for good practice in the sector.

2.18 The reason for the lack of clarity is because the Use Classes Order pre-dates the introduction of the variety of options for accommodation (with or without care) that now exist. The Use Classes Order is in need of updating in this respect.

2.19 The 2019 report 'Shining a spotlight on the hidden housing market'¹³ considered that a new use class should be created specifically for retirement living schemes as they have previously fallen under C2, C3 or sui generis, which has led to inconsistencies in terms of delivery, location and affordable housing provision between local authorities. The term 'specialist housing for older people' (see paragraph 2.3) covers a range of types of development. Some of those

8 Hartley, B (2018) Care Village Editorial. Healthinvestor

9 NPPG Paragraph: 014 Reference ID: 63-014-20190626

10 Appeal Decision: Ref: APP/Q3630/W/18/3195463. Oak Tree Nurseries, Stroude Road, Virginia Water, GU25 4DB. 15 February 2019

11 Appeal Decision: Ref: APP/A0665/W/18/3203413 Beechmoor Garden Centre, Whitchurch Road, Great Boughton, Chester CH3 5QD. 17 July 2019

12 Appeal Decision: Appeal Ref: APP/H2265/W/18/3202040 Land to the rear of 237-259 London Road, West Malling, Kent ME19 5AD. 19 December 2018

13 Shakespeare Martineau and Housing LIN (2019) Shining a Spotlight on the Hidden Housing Market.

types of development do not involve the delivery of care, nor the inclusion of facilities that support the delivery of care and on-going “wellness” and it is generally agreed that those developments fall within use class C3, whereas a retirement community falls fully within C2.

2.20 It is essential that the evidence base / viability assessment properly understands the retirement community model and these extra significant costs. **It is not appropriate for a C2 development to attract the same affordable housing requirement as C3 residential which does not have such costs to development.**

2.21 Specialist housing for older people differs in a number of ways that affect its viability, which all feed into the consideration of whether or not it can fund additional obligations such as affordable housing, including:

- Funding;
- The long-term operation, management and ownership of the site;
- The provision, maintenance, upkeep and management of the significant communal facilities, including its delivery before the first unit is occupied; and
- Staffing

2.22 These factors are intrinsic in recognising that a retirement community or extra care model is very different from Class C3 residential development that directly affects deliverability, and in turn the **inappropriateness of applying policy intended to be applied to C3 residential development.**

2.23 The following principles are drawn from recent appeal decisions, for example, Retirement Villages appeal at Shiplake in South Oxfordshire District Council¹⁴ that grapple with use class and the application of affordable housing policies:

- Even though it may be reasonable to consider individual self-contained units of accommodation as dwellings, where the proposed development forms a collection of units of accommodation with extensive communal facilities, beyond that reasonably likely to be provided in standard Class C3 accommodation, and which clearly exists to

serve the residents, both **the units and the communal facilities are intrinsic to each other and therefore, form part of the same planning unit.**

- That **planning unit as a whole** exists to provide accommodation with care, to people in need of care, falling wholly within use class C2.
- Where the units are occupied only by residents in need of, and receiving, a minimum level of care, their existence is founded on the need for, and delivery of accommodation with care, for those in need of care, in direct correlation with use class C2. Where this is secured through occupation restrictions set down within a legal agreement, the terms of the grant of permission mean it can only be used for use class C2.
- Where care and assistance is provided at additional cost to an occupant, the occupant is only likely to choose to live there if they are in need of that care and assistance.
- Care can cover a very broad range of activities that assist people in carrying out everyday tasks, which may become increasingly difficult with age. What is important is that the planning unit is designed and exists to provide care and which is capable of increasing over time. The physical attributes of the building, the interconnectivity between accommodation and facilities and the extent of communal facilities are all relevant to assessing the nature of the development.

2.24 The fundamental point arising from this, is that these developments exist to provide accommodation with the availability of care and the provision of extensive communal facilities. With regard to these points and the guidance provided in the PPG: *“when determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwellinghouse) of the Use Classes Order, consideration could, for example, be given to the level of care and scale of communal facilities provided.”*

2.25 An Inspired Villages development has a high level of care and significant amount of facilities meaning it is clearly a C2 use.

Definitions of care

2.26 A definition for ‘care’ is provided in the Interpretation section (Section 2.) of the Use Classes Order, as follows:

“care” means personal care for people in need of such care by reason of old age, disablement, past or present dependence on alcohol or drugs or past or present mental disorder, and in class C2 also includes the personal care of children and medical care and treatment.”

2.27 The 1987 Use Classes Order also pre-dates the formal definition of the term ‘Personal Care’ in the health legislation. For the avoidance of doubt, the term ‘Personal Care’ is now defined in the health and social care legislation, regulations and guidance, having been introduced in 2008; however, the reference to ‘personal care’ in the definition of care provided in the Use Classes Order is not synonymous with the health legislation definition, which did not exist at the time it was written. The definition in the Use Classes Order can only be taken in its practical sense, as described, i.e. ‘individual’ care to a person in need of care.

2.28 The different approach by different local authorities has led to different operational restrictions / obligations being secured at

different sites that essentially constitute very similar development, not helped by a Use Classes Order which is now of some considerable age. This is understandably difficult to manage and unpredictable for developers of this type of development.

2.29 To support delivery, we strongly encourage the local planning authority adopts policies that allow for the specific circumstances of the proposal to be assessed in each case, rather than seeking to pre-determine use class based on a particular characteristic; and to be clear that **affordable housing policies designed to apply to unrestricted, open market residential development do not apply to Class C2 development.** Where there is doubt, policies should provide sufficient flexibility for specific circumstances (e.g. may include viability) to be assessed through a planning application, unless specialist housing for older people had been fully considered at the plan-making stage (infrastructure, relevant policies and local and national standards, cost implications of Community Infrastructure Levy (CIL) and Section 106.¹⁵

Evidence base and approach for local plan-making

National planning policy context

3.1 The National Planning Policy Framework (NPPF) 2019 stresses the importance that the needs of groups with specific housing requirements are addressed, with paragraph 61 stating *‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies’*, including for older people. **The PPG identifies the evidence that plan-makers should consider when assessing the housing needs of older people;** in terms

of census data, projections of population and households by age group, together with the future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care)¹⁶. This can be assessed from online tool kits, e.g. The Extra Care Housing Toolkit¹⁷, Housing LIN SHOP¹⁸ and evidence prepared by health and well-being boards together with comparisons with other local authorities.

“The need to provide housing for older people is critical¹⁹”

¹⁴ Paragraph 43 - Appeal Decision APP/Q3115/W/19/3220425 Land to the east of Reading Road, Lower Shiplake, 14 October 2019

¹⁵ NPPG Paragraph: 015 Reference ID: 63-015-20190626

¹⁶ NPPG Paragraph: 004 Reference ID: 63-004-20190626

¹⁷ Care Services Improvement Partnership, Department of Health (2006) The Extra Care Housing Toolkit.

¹⁸ Housing LIN (2011) Strategic Housing for Older People (SHOP) Resource Pack.

¹⁹ NPPG Paragraph 001 Reference ID: 63-001-20190626

3.2 With specific regard to planning and the supply of homes for older people, the PPG sets out the following guidance for local planning authorities:

- **Set clear policies** to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the LPA will consider proposals for the different types of housing that these groups are likely to require.
- Can provide **indicative figures or a range for the number of units of specialist housing for older people** needed across the plan area throughout the plan period.²⁰
- Include the provision of housing for older people for **monitoring progress** when preparing the Authority Monitoring Report.²¹
- **Plans need to provide for specialist housing for older people where a need exists.** Innovative and diverse housing models will need to be considered where appropriate. Plan-makers need to consider the size, location and quality of dwellings needed to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.²²
- **Allocating sites** can provide greater certainty for developers and encourage the provision of sites in suitable locations, which may be appropriate where there is an identified unmet need. Location is a key consideration with factors including proximity to good public transport, local amenities, health services and town centres.²³

Recommendation Four:

The local plan should **set indicative figures or a range for the number of specialist housing for older people needed across the plan area** and throughout the plan period and this must recognise the diverse models that exist.

Recommendation Five:

The local planning authority must **monitor the delivery of specialist housing for older people and deliver action plans to address under provision.**

Recommendation Six:

The local plan should consider the **inclusion of specialist housing for older people within appropriate strategic or other site allocations** subject to consideration of need, site and locational factors and deliverability.

Evidence base and approach for local plan-making

Evidence base and methods

- 3.3 From Carterwood's research,²⁴ the typical average age for entry to private extra care housing is 80 to 82 years, with an age range of 70 to 90 years forming the bulk of residents. Typically, single females occupy 65–70% of units, couples 20–25%, and single males 10%. As such, it is important to assess the relative age profile of a catchment market in order to establish the size of the population matching this demographic, both in relative and absolute terms.
- 3.4 Older people will make a conscious choice to move into an extra care scheme and own or rent their property. This also means that the choice can be a large financial decision, often coinciding with a need to leave the larger family home, as well as an emotional decision.
- 3.5 The key demographic profile is where the household reference person (HRP), as defined by the Census 2011, i.e. the decision maker of any buying decision, meets the following criteria:
- 65+ years – we know from empirical evidence that the average age of those entering private extra care is 80+ years of age, and typically those entering sheltered housing is 70+ years. Therefore, the key demographic is the 65+ year age group.
 - Owns their property outright – therefore has the required equity in their own property to form the means of being able to make a private property purchase or rental decision.
- 3.6 It is important the evidence base properly assesses supply and demand, given the substantial increase in the elderly demographic, the high proportion of home ownership for those aged 65+ and the rapidly increasing cost of caring for the elderly population. The growth in the elderly demographic is not considered the best way of predicting demand for particular types of elderly care and accommodation, as traditional residential care homes make way for new forms of accommodation and care.
- 3.7 By considering older people's preferences should they need care, The Housing LIN SHOP toolkit advises that although over 60% of people wish to remain in their home, this decision may be limited by choice rather than preference. Often a choice is made based on what is available with a decision being made following a crisis event, when need is greatest. It suggests indicative levels of provision of various forms of accommodation for older people, including extra care and enhanced sheltered housing available on a long leasehold basis or for rent.
- 3.8 In 2004, Kerslake and Stilwell²⁵ estimated that about one-third of the population entering a care home *'could have moved to a form of housing with care as a viable alternative, with a further third who could have managed in such housing had they moved at some time earlier in their care history'*. Other models for estimating demand for supported housing and housing markets and independence in old age include Ball (2011).²⁶
- 3.9 LaingBuisson's 'Extra Care Housing UK Market Report'²⁷ does not provide a tool for assessing demand, but instead refers to the demographic factors that are likely to influence demand, as follows:
- An expansion of the older population;
 - A reduction in the pool of young adults available for training as nurses or care assistants to work in the community or care homes;
 - An increase in the number of middle-aged people looking after children and a parent;
 - An increase in the proportion of older people with a living child;
 - Changes in the health and dependency levels of older people; and
 - Changes in the patterns of immigration by potential care workers and emigration by trained care staff.

²⁰ NPPG Paragraph: 006 Reference ID: 63-006-20190626

²¹ NPPG Paragraph: 007 Reference ID: 63-007-20190626

²³ NPPG Paragraph: 012 Reference ID: 63-012-20190626

²⁴ NPPG Paragraph: 013 Reference ID: 63-013-20190626

²⁴ Carterwood Focus, Issue 13 (2014) Extra care housing – where do residents come from?

²⁵ Kerslake, A and Stilwell, P (2004) What makes older people choose residential care, and are there alternatives? Housing Care and Support

²⁶ Ball, M (2011). Housing Markets and independence in old age: expanding the opportunities. Henley, University of Reading

²⁷ LaingBuisson (2015) Extra Care Housing UK Market Report, Thirteenth Edition

3.10 LaingBuisson's Age Standardised Demand (ASD) rates for care home beds shows a trend whereby demand for residential care beds has reduced as alternatives to residential care are developed.

3.11 The use of comparative evidence and indicators from a variety of sources is a useful method to ascertain the indicative level of need for extra care in a particular local authority area. There will remain other accommodation options available, in addition to retirement communities, including remaining in their own homes, moving to traditional sheltered housing, a care home or to another informal care setting. Most importantly, it is necessary to have a full understanding of the various forms of care and accommodation, knowledge of schemes and their availability, and input from a range of sources to determine appropriate indicative levels of need over the plan period (including existing shortfalls).

3.12 The methods of determining demand in a given area reveal a clear message; that **there is a strong and increasing demand for new forms of care and accommodation as an alternative to traditional residential care**, alongside an increased requirement for nursing and dementia care homes for those with the highest care needs. The difficulty in trying to accurately assess demand for extra care housing is that, due to the relatively new nature of the product, there is no position of over-supply upon which to assess a position of balance. Essentially, the additional supply creates 'demand' when it is developed.

3.13 The government's response to the Inquiry into Housing for Older People (2019),²⁸ included the following points and which the local authority should consider in their plan preparation:

- *'We have a rapidly ageing population. The needs of older people are now different from previous generations and their aspirations around housing and lifestyles have changed dramatically.'*

- **Offering older people a better choice of accommodation can help them to live independently for longer, improve their quality of life and free up more family homes for other buyers.**

- *We recognise that the **integration of housing with health and social care services is a vital part of ensuring that people are able to live healthier, more independent lives for longer.***

- *We agree that more older owner-occupiers, living in low value housing, should have the opportunity to move to more appropriate housing as they age. At present, new commercial specialist older people's housing tends not to cater for this market while new supported housing is largely targeted at the most vulnerable. We are keen to encourage innovative approaches, especially from local authorities and housing associations.*

- **More of all types of housing for older people – extra care, sheltered and accessible housing – need to be built across the social and private sectors.**

- *Older people moving home in later life could be part of the solution to tackling the housing shortage but there is little evidence to support this. We agree that further research into the impact of older people moving home on the housing market could contribute to a stronger evidence base to inform policy making.*

- *It is important that providers use clear terminology (with regard to the different types of specialist housing), so that people can make informed choices.'*

“There is a strong and increasing demand for new forms of care and accommodation as an alternative to traditional residential care.”

Evidence base and approach for local plan-making

3.14 The government's Social Care White Paper, 'Caring for our Future',²⁹ committed to provide **support to help local authorities develop their market capacity to provide greater choice for users and drive up quality in care services.** The Developing Care Markets for Quality and Choice programme, launched by the Department of Health in 2012, is intended to support local authorities to improve capacity through **preparing or improving their market position statements.**

3.15 The 2013 'Top of the Ladder' report by Demos,³⁰ the leading cross-party think tank, provided some key findings:

- *'Retirement properties make up just 2% of the UK housing stock, or 533,000 homes, with just over 100,000 to buy. One in four (25%) over-60s would be interested in buying a retirement property – equating to 3.5 million people nationally.'*
- *More than half (58%) of people over 60 were interested in moving. More than half (57%) of those interested in moving wanted to downsize by at least one bedroom, rising to 76% among older people currently occupying three, four and five-bedroom homes.*
- *If just half of the 58% of over-60s interested in moving (downsizing and otherwise) were able to move, this would release around £356 billion worth of (mainly family-sized) property – with nearly half being three-bedroom and 20% being four-bedroom homes.'*

3.16 The report suggested a number of national policy recommendations to assist in overcoming these problems:

- *'Giving retirement housing special planning status akin to affordable housing, given its clear and demonstrable social value.'*

“One in four (25%) over-60s would be interested in buying a retirement property.”

- *Tackling S106 and community infrastructure levy (CIL) planning charges, which make many developments untenable and affect them disproportionately compared with general needs housing developments'.*

- *Quotas and incentives for reserving land for retirement housing, and linking this to joint strategic needs assessment and health and well-being strategies for local areas.'*

3.17 Inspired Villages recommends clear policies in development plans to support new retirement communities. The evidence is clear, as are the benefits to support the approach and deliver much-needed specialist accommodation for the elderly.

3.18 The 'Shining a Spotlight on the hidden housing market' report included a survey of 200 individuals from a variety of backgrounds in the UK later living sector, from local authorities to private developers, care operators and designers. Some 97% of respondents thought that the development of later living accommodation would play a key role in alleviating the housing crisis and 73% thought that the demand for later living accommodation would significantly increase in the next 5 years, while 89% felt that planning laws would need to change to boost later living development and 33% are calling for a 'Retirement Villages Act'.

3.19 Some of the strategic recommendations from the report is that there should be legislative and policy suggestions for local and national government, including reform of planning policies, tax breaks for older people looking to 'right-size', and the appointment of a dedicated minister responsible for the needs of older people.

²⁸ Government response to the second report of 2017-2019 of the Housing, Communities and Local Government Select Committee Inquiry into housing for older people. (September 2018)

²⁹ HM Government (2012) Caring for our future: reforming care and support
³⁰ Wood, C (2013). The Top of the Ladder. Demos

Local planning authority plan-making

- 4.1 Many local authorities are increasingly aware of the variety of accommodation and care options available to enable the elderly to receive care within their own homes, and as a more cost-effective alternative to residential care. In certain areas, they are considering the potential for the reconfiguration of dated and under-used sheltered housing stock to provide additional, affordable extra care housing.
- 4.2 In reality, upgrading sheltered housing to extra care suitable for those with increasing care needs is rarely the most efficient solution, as existing developments are often too small to enable the required economies of scale to deliver 24-hour on-site care, nor are they able to provide the layout and additional communal facilities necessary to form a genuine extra care community.
- 4.3 Housing LIN consider that the later living market needs to be made both acceptable and financially viable to enable older people to move from unsuitable accommodation (too large to manage, costly to maintain, poorly located or ill-equipped to deal with changing needs) to better, thoughtfully designed homes in sought-after places. *'Right-sizing does not mean a compromise on design'* and new homes that are accessible and adaptable and can meet with the current and future lifestyle goals of potential residents.
- 4.4 There is a strong wish for older people to remain independent for as long as possible, and extra care housing appeals to this desire. The key issues leading people to move into extra care are health and care requirements, frequently prompted by the death of a spouse or partner. The decision to move is often strongly influenced by immediate relatives, and the more frail or vulnerable the elderly person, the more this applies. Aspects such as accessibility and convenience for visiting play a major role in the decision making.
- 4.5 An estimated six million people provide significant support to elderly relatives, neighbours and friends across the UK. This factor contributes additional demand, as carers understand the benefits associated with their charges moving to an environment where some of the care burden can be shared, allowing them to remain, sometimes indefinitely, outside of the care home environment. Additionally, the family is often involved in a decision to move a loved one to an extra care scheme located more conveniently, so that regular visits are more easily made and concerns over 'welfare at a distance' can be eliminated.
- 4.6 In 2019, ARCO partnered with ProMatura to conduct the biggest ever study of retirement communities,³⁰ with surveys of residents representing 81 communities and 15 different care operators, which provided evidence of the huge health, wellbeing and security benefits for residents.
- 4.7 The main reasons given for moving to a retirement community were cited as being: less need for property maintenance, access to communal facilities, and the availability of 24-hour support and domiciliary care on site. The benefits of living in extra care included: being more active and healthier for longer, the ability to enjoy life, having greater control, and feeling safe and secure, with a consequent reduction in loneliness.
- 4.8 The **resultant recommendations for action** set out, amongst others, that the government and local authorities should:
- *'Develop a legal and regulatory framework for Retirement Communities to bring the UK into line with leading countries around the world'*
 - *'Develop a clear definition and terminology for Retirement Communities and recognise the significant contribution they are making to our health and social care systems'*
 - *'Provide more funding and land for affordable housing in Retirement Communities'*
 - *'Undertake further research on the level of Retirement Community supply and demand in their areas'*
 - *'Ensure they have provisions in their local plans for Retirement Community housing'*
 - *'Partner with specialist Housing Associations with expertise in extra care Retirement Communities to increase provision.'*

³⁰ ARCO with research by ProMatura International (2019) Housing, Health and Care. The health and wellbeing benefits of Retirement Communities.

Local planning authority plan-making

- 4.9 Tailored housing that is accessible, well designed and well located for facilities may reinvigorate a person's social life through their offer of a wide range of activities and communal areas that provide opportunities for making new friends. There is evidence that residents have better health outcomes than older people living elsewhere; designs that minimise the risk of falling, for example, and social facilities that reduce feelings of loneliness.
- 4.10 By providing an attractive alternative type of accommodation in the form of extra care housing, older homeowners may benefit from releasing equity from their existing properties, which they can use to fund their retirement years. Extra care housing can also contribute to addressing wider housing market concern, by releasing their homes onto the market for families.
- 4.11 There are other benefits in promoting care villages as they can reduce the demand upon health and social care. Research from Aston Research Centre³¹ in 2015 set out that the NHS saved more than **£1,000 per year on each resident** living in Extra Care Charitable Trust's schemes between 2012 and 2015. The Homes for Later Living 'Healthier and Happier' report³² suggests that each person living in older people's housing contributes to a fiscal saving to the NHS and social care of approximately **£3,500 per annum**. Inspired Villages typical model providing 150 units would generate a population of approximately 195 residents (average occupancy 1.3 persons per unit) being **equivalent to over £680,000 savings to the NHS and social care every year, a significant benefit**.
- 4.12 As an operator, unlike residential developers, Inspired Villages considers the long-term ownership and management of the site; therefore, it is vital that we secure suitable sites and planning permissions that allow the implementation of a viable development. It is often very difficult for an operator, such as Inspired Villages to secure sites on the open market due to competition from residential developers who do not provide the level of facilities or care that a retirement community does.
- 4.13 The inclusion of positive policies to support extra care housing could give landowners an incentive to proceed with this type of development over a residential developer and can be partly justified on the basis that extra care / retirement community developments are relatively self-contained (because of the extensive communal facilities on-site); lower traffic generation, which are predominantly off-peak (because residents do not commute to work); are employment generators; and can result in savings to the NHS and adult social care, amongst other significant benefits.
- 4.14 We recommend that the local planning authority properly engages with the extra care sector regarding the potential for including this form of development in strategic site allocations to ensure this would be deliverable, or an appropriate site location. The sector is an emerging market and operators do not tend to have strategic land, meaning they may not be able to promote potential sites at the time the local plan is being prepared.
- 4.15 To avoid being prejudiced, LPAs should consider whether policies allow for a greater degree of flexibility for proposals for specialist housing for older people on land that may otherwise be inappropriate for standard residential development, for example, adjacent to settlement boundaries where those settlements provide a certain level of services and facilities. Such a policy approach has been applied in local planning authorities, such as Hart District, South Northamptonshire and Horsham District. (See examples at back of document.)

Recommendation Seven:

The local plan and its evidence base **must recognise the significant benefits associated with specialist housing for older people** and this can inform planning decision making.

³¹ Holland, C (2015) Collaborative Research between Aston Research Centre for Healthy Ageing (ARCHA) and the ExtraCare Charitable Trust

³² WPI Strategy for Homes for Later Living (2019) Healthier and Happier; An analysis of the fiscal and wellbeing benefits of building more homes for later living

Local planning authority plan-making

Recommendation Eight:

The local plan should set out different policy requirements, for example, affordable housing, for specialist housing for older people (C2 use) compared to residential development within the C3 use class and the evidence base, viability must be taken into account the different circumstances between the uses (e.g. retirement communities / extra care provide significant levels of communal facilities / non saleable floorspace and their ongoing maintenance and management, staffing, funding, etc). Where there is doubt, policies should provide sufficient flexibility for specific circumstances, which may include viability, to be assessed through a planning application.

4.16 Inspired Villages recognises that some local planning authorities have specifically considered the need for policies to be adopted to support the delivery of affordable extra care type housing, but Inspired Villages is concerned to ensure that local planning policy also gives sufficient policy support for the full range of specialist housing provision to serve older people, including private sector extra care housing / retirement communities, as set out in the definitions of specialist housing in the PPG. The need identified for both affordable and private tenures, and **LPAs have a duty to plan for the delivery of development to meet all housing needs.** The 'critical need' has been identified in the PPG and the requirement to ensure

sufficient land is available to address housing requirements of groups with specific needs and incorporate policies that deliver housing for all is identified at **paragraphs 59 and 61 of the NPPF**. Private sector retirement community developments are one of the options (along with care homes, affordable models, and sheltered housing) that will contribute towards addressing the need.

4.17 In addition to responding to this duty, **planning policies that support the delivery of specialist housing for all older people, regardless of financial means, are of significant benefit to social care and NHS funding.** This is because, individuals who plan for their future by using their own private financial means to secure accommodation in a setting that supports their health and wellness, without or before the need to call on the NHS and social care, will significantly reduce their need to draw on these socially funded services. LPAs should not underestimate the beneficial effect that supporting development proposals that facilitate people to fund and plan for their own health and wellness.

4.18 We therefore strongly encourage the **LPA produce policy, which supports the delivery of specialist housing to meet the needs of older people in line with the requirements of the NPPF and the PPG** which states "*where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need.*"³⁴

Rectory Homes Judgement

Rectory Homes Ltd sought permission for 'the erection of a 'Housing with Care' development (use class C2) for 78 open market extra care dwellings and a communal residents centre' in Thame, South Oxfordshire. Both the applicant and the local planning authority were in agreement that the proposed use fell within use class C2, but there were differing opinions as to whether an affordable housing contributions was required.

The question to be determined by the Court was whether the proposed C2 units were 'dwellings' for the purpose of the development plan policy. The Court concluded that units of accommodation that allow for independent living comprise dwellings despite falling within use class C2 meaning that an extra care development may be caught by a widely drafted policy requirement to provide affordable housing.

As a consequence the decision has the potential to cause significant difficulties for the sector, resulting in an increased reliance on viability assessments, resulting in further cost and uncertainty in the planning process. This has the potential to disincentivise delivery of a much-needed form of specialist accommodation in circumstances where providers are already at a disadvantage against traditional residential developers due to the inherent costs within a retirement community development.

It is important that the drafting of affordable housing is precisely worded to reflect its applicability to C3 residential dwellings, particularly where the Council's evidence base viability work has not assessed retirement communities.

³⁴ NPPG Paragraph: 016 Reference ID: 63-016-20190626

Examples of other local authorities taking a similar policy approach

Hart Local Plan Strategy and Sites 2016-2032 (as of April 2020 local plan pending adoption):

Policy H4 - Specialist and supported accommodation (as per main modifications)

Proposals for specialist and supported accommodation that meets the needs of older persons or others requiring specialist care will be permitted:

- a) On sites within settlement boundaries and within the new community at Hartland Village; and
- b) On sites in the countryside provided:
 - i. There is a demonstrated local need for the development in that area; and
 - ii. There are no available or viable alternative sites within settlement boundaries where the need arises; and
 - iii. The site is well related to an existing settlement with appropriate access to services and facilities either on or off site.

South Northamptonshire Part 2 local plan (Emerging):

Proposed policy LH6 - Specialist housing and accommodation needs (including proposed modifications)

Proposals to meet older persons / specialist housing needs for two or more dwellings will be supported on suitable sites that are within the settlement confines subject to the following criteria:

- a) The location is well served by public transport or within walking distance of community facilities (within 400m) such as shops, medical services, public open space, and social networks appropriate to the needs of the intended occupiers, or where this is not the case, such facilities are provided on site; and
- b) The scale, form and design of the development is appropriate to the client group and in relation to the settlement where it is located; and
- c) Highway, parking and servicing arrangements are satisfactorily addressed; and
- d) Gardens and amenity space are provided and are of an appropriate size and quality.

Proposals for older persons / specialist housing on suitable sites immediately adjacent to the settlement confines of Rural Service Centres and Primary Service and Secondary Villages (A) should meet all of criteria (a) to (d) above and:

- e) The scale of development should be clearly justified by evidence of need in the district; and
- f) Evidence is provided which demonstrates that there are no alternative suitable available sites within the adjacent confines

Horsham District Planning Framework (November 2015)

Policy 18 Retirement Housing and Specialist Care

1. Proposals for development which provide retirement housing and specialist care housing will be encouraged and supported where it is accessible by foot or public transport to local shops, services, community facilities and the wider public transport network. The Council will particularly encourage schemes that meet identified local needs for those on lower incomes and provide affordable accommodation for rent or shared ownership / equity.

2. Large scale 'continuing care retirement communities' will be supported in appropriate locations, normally within defined built-up areas, where they can be justified in terms of meeting identified need, and:

- a) Provide accommodation for a full range of needs, including care provision separate from the self-contained accommodation;
- b) Include 'affordable' provision to meet identified local needs, or where this is not possible, provide an appropriate commuted sum in lieu of on-site units; and
- c) Include appropriate services and facilities, including transport, to meet the needs of residents / staff and which contribute to the wider economy.

Vale of Aylesbury District Council Main Modifications

Suggested new policy - H6b Housing for older people - in addition to identifying two site allocations and four broad locations for the provision of C2 accommodation, also proposes:

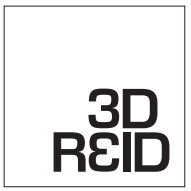
3. Proposals for C2 older people accommodation, planning permission will be granted subject to the following criteria:

- a) The proposal is in a sustainable location for amenities and services
- b) There is an identified package of care provision on site
- c) Minimum Clinical Commissioning Group inspected space standards are met or exceeded
- d) Facilitates social and recreational activity
- e) Guest accommodation per unit (unless the proposal is for Extra Care Sheltered Accommodation)



CENTURION CLUB
INSPIRED VILLAGES
INSPIRED AREA

Drawing No. 200114-3DR-XX-DR-A-07003 Rev No. A Scale. 1:2000@A3





Hemel Garden Communities

Image: GoogleEarth

25 January to 5pm 8 March 2021
'Call for Sites 2021' Site Identification Form

St Albans City and District Council is in the process of preparing a new Local Plan 2020-2038. The 'Call for Sites' is an early opportunity for individuals, landowners and developers to suggest sites within the District for development over the next 15-20 years. The site suggestions received by us will be used to inform the preparation of the new Local Plan 2020-2038.

You are invited to put forward any new sites that you would like the Council to consider in its Housing Economic Land Availability Assessment (HELAA). These should be capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more). The Council will take account of the Strategic Housing Land Availability Assessment (SHLAA) submissions previously received since 2009 and therefore there is no need to resubmit these unless circumstances have changed. Sites from previous SHLAAs will form part of the Council's assessment. Proposed land uses can include:

- Housing
- Gypsy & Traveller Housing
- Mixed Use
- Employment
- Renewable and low carbon energy and heat
- Biodiversity Improvement / Offsetting
- Green Belt Compensatory Land
- Land for Tree Planting
- Other

To enable sites to be mapped digitally, please provide GIS shapefiles of your site, where possible.

The consultation period runs for six weeks between Monday 25 January to 5pm on Monday 8 March 2021.

Unfortunately, we cannot treat any of the information you provide as confidential.

It is important to note that not all sites received through the 'Call for Sites' will be appropriate for consideration as part of the Housing Economic Land Availability Assessment (HELAA). As a general rule:

We encourage you to submit sites that are likely to become available for development or redevelopment between now and 2038.

Please do not submit sites that:

- Are already included as a housing allocation in the St Albans District Local Plan Review (November 1994) – i.e. sites that are listed in 'saved' Policies 4 and 5.

- Have already been submitted to the Council for consideration via previous 'Call for Sites' and Strategic Housing Land Availability Assessment (SHLAA) processes (unless information is updated/changed).
- Already have planning permission for development, unless a new and different proposal is likely in the future; or
- Are situated outside St Albans City and District's administrative area.

If you wish to update information about a site previously submitted please complete the form below.

Please return the **form and site location plan** to the Spatial Planning and Design Team. We strongly encourage digital submissions via our online portal.

By online consultation portal:

<http://stalbans-consult.limehouse.co.uk/portal/>

By e-mail to: planning.policy@stalbans.gov.uk

By post to: St Albans Council Offices, St Peters Street, St Albans, Hertfordshire, AL1 3JE

Due to COVID-19; offices being shut and officers working from home; submissions by post are discouraged.

| Your Details | |
|----------------------|--|
| Name | Robert Harrison |
| Company/Organisation | Arrow Planning |
| Address | Clarks Barn, Bassetsbury Lane, High Wycombe |
| Postcode | HP11 1QX |
| Telephone | |
| Email | |
| Your interest | <input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other |

| Site Details | | | | | |
|---|--|----------|--------|----------|--------|
| Requirements: <ul style="list-style-type: none"> • Delivers 5 or more dwellings or; • Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more) | | | | | |
| Site address/location (Please provide a map showing the site boundary) | Land adjacent to Westwick Cottage, Westwick Row, Hemel Hempstead, HP2 4UB | | | | |
| Site area (in hectares) | 0.48ha | | | | |
| Coordinates | <table border="1"> <tr> <td>Easting</td> <td>509108</td> <td>Northing</td> <td>206690</td> </tr> </table> | Easting | 509108 | Northing | 206690 |
| Easting | 509108 | Northing | 206690 | | |
| Site Location Plan Attached | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | | | |
| GIS mapping shapefile attached (in .shp file format) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | | | |
| Landownership (please include contact details if known) | <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> Blenheim Realty Ltd. 25 Warren Road, Bushey Heath, Bushey, WD23 1HU | | | | |
| Current land use | Equestrian. | | | | |
| Condition of current use (e.g. vacant, derelict) | Currently in use for equestrian purposes. Vacant | | | | |
| Suggested land use | <input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input type="checkbox"/> Other (please specify) | | | | |
| Reasons for suggested development / land use | The Site is available, suitable (sustainably located adjacent to an existing urban area) and available to be delivered in the next 1-5 years. The area to the northwest is in residential use, which means residential use of the site will complement existing use patterns. The site was included as a residential allocation within the most recently withdrawn Local Plan and the evidence underpinning that allocation remains sound and should apply going forward. | | | | |

| | |
|---|--|
| Likely timescale for delivery of suggested development / land use | <input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years |
|---|--|

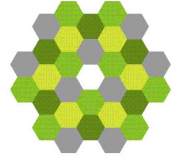
| | | |
|------------------|---|--|
| Site Constraints | Contamination/pollution issues (previous hazardous land uses) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Environmental issues (e.g. Tree Preservation Orders; SSSIs) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Flood Risk | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Topography affecting site (land levels, slopes, ground conditions) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Utility Services (access to mains electricity, gas, water, drainage etc.) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Legal issues (For example, restrictive covenants or ownership titles affecting the site) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable). |

| | | |
|-----------------|---|---|
| | Other constraints affecting the site | <input type="checkbox"/> Yes (If yes, please specify) <input checked="" type="checkbox"/> No |
| Planning Status | <input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input checked="" type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other – Pending Appeal Decision Please include details of the above choice below: Site was included in recently withdrawn Local Plan as an allocation for residential development (see next section). | |

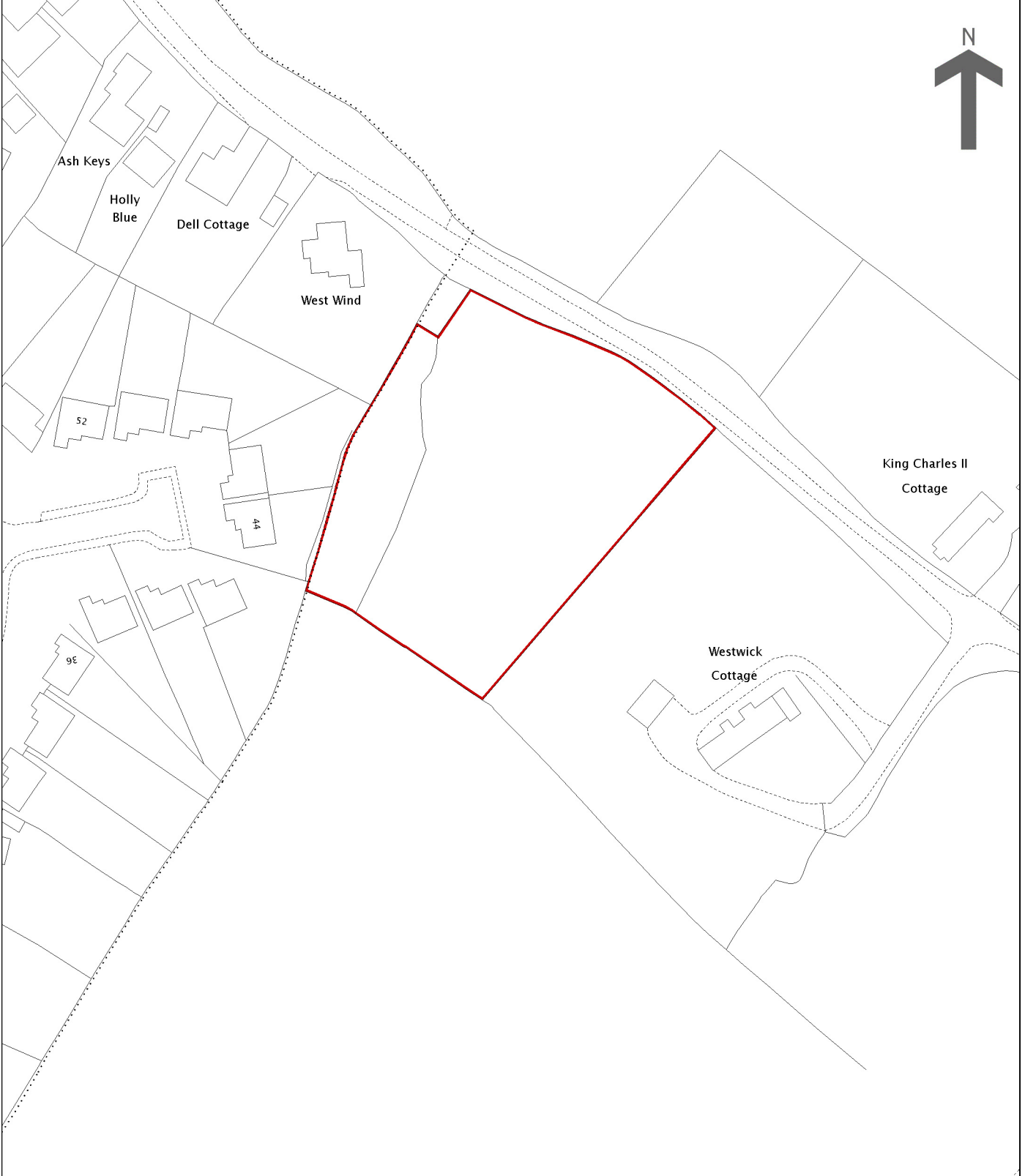
| | |
|----------------|---|
| Other comments | <p>The Site comprises a 0.48ha rectangular shaped parcel of land, adjacent to Westwick Cottage, Westwick Row. The site benefits from mature vegetation on its perimeter. It is currently used for equestrian purposes. It does not contain any structures. Access to the site is provided directly via Westwick Row.</p> <p>Immediately to the northwest of the Site is the urban settlement of Hemel Hempstead, which contains a variety of services and employment opportunities and is well served by public transport providing alternatives to the private car. A number of services and employment opportunities are located a short walk or cycle from the Site.</p> <p>The mature vegetation that encloses the Site serves to limit the contribution that the Site makes to openness or the character of the wider countryside. The site is not in close proximity to identified areas of ecological importance or any Conservation Areas. The Site forms a natural extension to the urban area of Hemel Hempstead.</p> <p>Based on a net density of 40dph (taken from policy S6 of the now withdrawn Local Plan) it is considered that the Site is capable of accommodating c.18 dwellings, whilst respecting the character of the area. In the event the Site was bought forward in combination with the surrounding land, as was proposed in the now withdrawn Local Plan, a higher density may be achievable as the site would occupy a more urban location.</p> <p>In Green Belt terms, the land does not perform strongly against the five Green Belt purposes as indicated in para. 134 of the NPPF (2019). The allocation of this Site, whether in isolation, or as part of a larger urban extension would represent a controlled strategic expansion of Hemel Hempstead.</p> <p>The Site is bordered on the north and south by land owned by Crown Estate. This land was put forward in the SHLAA 2018 (see ref: 400d), for the provision of 2,650 homes. This same land was promoted by the Council as part of the East Hemel Hempstead (South) allocation for 2400 homes (in combination with Dacorum Borough Council). For the same reasons that this Site and the surrounding land was considered to be appropriate for development in the now withdrawn Local Plan, it continues to be considered appropriate in the emerging new Local Plan.</p> |
|----------------|---|

Land Registry
Official copy of
title plan

Title number **HD440910**
Ordnance Survey map reference **TL0906NW**
Scale **1:1250**
Administrative area **Dacorum**



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Archived: 02 June 2021 11:17:52

From:

Sent: Sat, 20 Feb 2021 17:29:50

To: Planning Policy (SADC)

Subject: Call for Sites 2021

Sensitivity: Normal

Hi,

I live in [redacted] and I have two plots of land that I wish to put forward as prospective building plots for housing in the new Local Plan. Each plot meets the criteria and would be big enough for at least 5 houses. The land is at plots 112 and 114 Ragged Hall Lane, Chiswell Green AL2 3NP. The plots are both road facing and are close to current power utilities. Please see the attached map. Please let me know if you need any further information.

Best regards

[redacted]

--



114 112

Chiswellgreen

Windridge Farm

Windridge Farm Cottages

Marlborough School

Long Spring

POTTERS CROUCH LANE

BAGGED HALL LANE

BURTONWOOD LANE

Potters Crouch

Square Wood

Square Wood

Wimbushae

Cuckman's Farm

Wearfield's Farm

Stables

Allot Gdns

Recreation Ground

Playing Field

Playing Field

Schools

Julian's Wood

Community Centre

Greenwood Park

St Stephen Green Farm

St Albans Polo Club

Plastows Farm

Airfield

Chiswellgreen Farm

25 January to 5pm 8 March 2021
'Call for Sites 2021' Site Identification Form

St Albans City and District Council is in the process of preparing a new Local Plan 2020-2038. The 'Call for Sites' is an early opportunity for individuals, landowners and developers to suggest sites within the District for development over the next 15-20 years. The site suggestions received by us will be used to inform the preparation of the new Local Plan 2020-2038.

You are invited to put forward any new sites that you would like the Council to consider in its Housing Economic Land Availability Assessment (HELAA). These should be capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more). The Council will take account of the Strategic Housing Land Availability Assessment (SHLAA) submissions previously received since 2009 and therefore there is no need to resubmit these unless circumstances have changed. Sites from previous SHLAAs will form part of the Council's assessment. Proposed land uses can include:

- Housing
- Gypsy & Traveller Housing
- Mixed Use
- Employment
- Renewable and low carbon energy and heat
- Biodiversity Improvement / Offsetting
- Green Belt Compensatory Land
- Land for Tree Planting
- Other

To enable sites to be mapped digitally, please provide GIS shapefiles of your site, where possible.

The consultation period runs for six weeks between Monday 25 January to 5pm on Monday 8 March 2021.

Unfortunately, we cannot treat any of the information you provide as confidential.

It is important to note that not all sites received through the 'Call for Sites' will be appropriate for consideration as part of the Housing Economic Land Availability Assessment (HELAA). As a general rule:

We encourage you to submit sites that are likely to become available for development or redevelopment between now and 2038.

Please do not submit sites that:

- Are already included as a housing allocation in the St Albans District Local Plan Review (November 1994) – i.e. sites that are listed in 'saved' Policies 4 and 5.

- Have already been submitted to the Council for consideration via previous 'Call for Sites' and Strategic Housing Land Availability Assessment (SHLAA) processes (unless information is updated/changed).
- Already have planning permission for development, unless a new and different proposal is likely in the future; or
- Are situated outside St Albans City and District's administrative area.

If you wish to update information about a site previously submitted please complete the form below.

Please return the **form and site location plan** to the Spatial Planning and Design Team. We strongly encourage digital submissions via our online portal.

By online consultation portal:

<http://stalbans-consult.limehouse.co.uk/portal/>

By e-mail to: planning.policy@stalbans.gov.uk

By post to: St Albans Council Offices, St Peters Street, St Albans, Hertfordshire, AL1 3JE

Due to COVID-19; offices being shut and officers working from home; submissions by post are discouraged.

| Your Details | |
|----------------------|--|
| Name | Andrew McPheat |
| Company/Organisation | Knight Frank |
| Address | 55 Baker Street, London |
| Postcode | W1U 8AN |
| Telephone | |
| Email | |
| Your interest | <input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other |

Site Details

Requirements:

- Delivers 5 or more dwellings or;
- Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)

| | | | |
|---|--|--|----------|
| Site address/location (Please provide a map showing the site boundary) | Land to the North of Ragged Hall Lane, Chiswell Green, St Albans, AL2 3LD. Please see submitted plans. | | |
| Site area (in hectares) | 2.1 | | |
| Coordinates | Easting | | Northing |
| Site Location Plan Attached | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| GIS mapping shapefile attached (in .shp file format) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | |
| Landownership (please include contact details if known) | Submitted on behalf of Acre c/o Knight Frank. Acre are the landowners. | | |
| Current land use | No current land use. | | |
| Condition of current use (e.g. vacant, derelict) | Vacant. | | |

| | |
|---|---|
| Suggested land use | <input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input checked="" type="checkbox"/> Mixed Use (please specify) – <i>residential-led but potentially with complimentary land uses.</i> <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input type="checkbox"/> Other (please specify) |
| Reasons for suggested development / land use | <ul style="list-style-type: none"> • The site is deliverable; it is available and suitable for residential development; and development is considered to be achievable within the first five years of the new Local Plan period. • The site is located in a sustainable location adjacent to Chiswell Green (which is identified as a ‘larger village’), and therefore development of the site would represent sustainable patterns of development. • The site represents a logical, minor extension to Chiswell Green that would address the inspectors’ comments relating to the previous Local Plan not providing enough diversity in terms of site size. • The site is able to make provision for a minimum of 43 dwellings in a landscape-led layout that would enable the delivery of not just much-needed housing, but also public open space and contributions to local infrastructure. • The site is both deliverable and developable, and exceptional circumstances exist to release the site from the Green Belt. |
| Likely timescale for delivery of suggested development / land use | <input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years |

| | | |
|------------------|---|--|
| Site Constraints | Contamination/pollution issues (previous hazardous land uses) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Environmental issues (e.g. Tree Presentation Orders; SSSIs) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Flood Risk | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

| | | |
|--|--|--|
| | Topography affecting site (land levels, slopes, ground conditions) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Utility Services (access to mains electricity, gas, water, drainage etc.) <i>(Assumed that this means access to utility services)</i> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| | Legal issues (For example, restrictive covenants or ownership titles affecting the site) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable). |

| | | |
|--|--------------------------------------|---|
| | Other constraints affecting the site | <input type="checkbox"/> Yes (If yes, please specify) <input checked="" type="checkbox"/> No |
|--|--------------------------------------|---|

| | |
|------------------------|---|
| <p>Planning Status</p> | <p> <input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input checked="" type="checkbox"/> Other </p> <hr/> <p>Please include details of the above choice below (for example planning reference numbers and site history)</p> <p>No planning history for the site.</p> |
| <p>Other comments</p> | <p>Please see submitted representations titled '2020 03 08_Ragged Hall Lane Chiswell Green Reps'.</p> |

Call for Sites Representation.

Land to the North of Ragged Hall Lane, Chiswell Green, St Albans, AL2 3LD
8 March 2021 | Public

Executive Summary

Knight Frank LLP have been instructed by Acre to submit representations to the 'call for sites' consultation in respect of 'Land to the North of Ragged Hall Lane, Chiswell Green, St Albans, AL2 3LD' ('the site').

This document provides a summary of the site, demonstrating its sustainable location; outlines relevant comments from the inspectors in relation to the withdrawn Local Plan; undertakes a high-level Green Belt assessment, demonstrating the site makes no / limited contribution in this regard; demonstrates the site's deliverability and potential capacity; and concludes with exceptional circumstances to justify the site's release from the Green Belt.

In summary, the site is deliverable; it is available and suitable for residential development; and development is considered to be achievable within the first five years of the new Local Plan period. The key points detailed within this document are briefly summarised below:

- The site is located in a sustainable location adjacent to Chiswell Green (which is identified as a 'larger village'), and therefore development of the site would represent sustainable patterns of development.
- The site represents a logical, minor extension to Chiswell Green that would address the inspectors' comments relating to the previous Local Plan not providing enough diversity in terms of site size.
- The site is able to make provision for a minimum of 43 dwellings in a landscape-led layout that would enable the delivery of not just much-needed housing, but also public open space and contributions to local infrastructure.
- The site is both deliverable and developable, and exceptional circumstances exist to release the site from the Green Belt.

The Site

The site – as shown in **Figure 1.1** below – is located in a sustainable location with excellent accessibility to local services and facilities, including public transport.

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[knightfrank.co.uk](https://www.knightfrank.co.uk)

Connecting people & property, perfectly.

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Figure 1.1 | Site Location



The currently undeveloped 2.1-hectare (5.1-acre) site adjoins the northern edge of the settlement of Chiswell Green and is bounded by a large residential dwelling and vacant greenfield land to the north; the private access for the aforementioned residential dwelling to the east; the curtilage of residential dwellings which front Ragged Hall Lane to the south; and vacant greenfield land to the west.

Chiswell Green is defined in the adopted District Plan as a 'large village specified settlement'. These forms of settlements are second to towns (such as St Albans and Harpenden) in settlement hierarchy terms, therefore making them more sustainable and logical locations for future development.

In terms of public transport, the nearest bus stops are located at the eastern end of Ragged Hall Lane, approximately 480 metres from the centre of the site. The bus stops – one of which is located on the western side of Watford Road (heading north) and the other located on the eastern side of Watford Road (heading south) – are served by the '321' and '361' services. These services provide direct connectivity to Luton, St Albans, and Watford (and surrounding areas in between). The walking time from the centre of the site to these bus stops is approximately 5 minutes. The nearest train station is St Albans Abbey which is approximately 2.1 kilometres (1.3 miles) to the north-east of the site. West Midlands Trains services serve this station and provide direct connectivity to Watford Junction (which, in turn, provides direct services to London and other main UK towns and cities). The site is also in close proximity to How Wood and Park Street train stations (both approximately 2.8-kilometres from the site).

In terms of access to other local services and facilities, the site is in close proximity to both primary and secondary schools, as well as public open space, retail services, and other community services (such as doctor and dentist surgeries).

In terms of adopted planning designations, the position of the site adjacent to the settlement boundary for Chiswell Green means that it is located within the Green Belt. Apart from this, there are no other planning designations to report. No planning applications of note have previously been submitted in relation to the site. The site is also not located in a designated neighbourhood plan area.

Withdrawn Local Plan

The previously emerging Local Plan was formally withdrawn by the Council in November 2020. This followed the inspectors' post-hearing letter from April 2020 which recommended that the Plan be withdrawn.

Although citing several reasons why the previous Local Plan could not advance (including not meeting the duty-to-cooperate), the inspectors hone in on the need to not just identify more small and medium-sized sites (rather than relying on larger strategic sites), but also to ensure that these sites are adequately assessed (which was not the case under the previous evidence base). A summary of the inspectors' key comments in relation to the site are provided below:

- The Green Belt Assessment (2013/14) – which formed part of the now-withdrawn Local Plan's evidence base – found that the small sub-areas of land identified within the 2013 iteration of the assessment *"may not be exhaustive"*, and that *"additional potential small-scale boundary changes that would also not compromise the overall function of the Green Belt could be identified through a more detailed survey"*. As such, the capacity from smaller sites could be much higher than that estimated by the Council.
- In light of the large number of homes that would need to be accommodated, the Council decided that only strategic scale Green Belt sites would be taken forward in the Plan. The inspector notes that the advantages of strategic scale sites over smaller ones was *"an explicit evaluative choice made by the Council"* based on *"a judgement that the strategic scale sites offer infrastructure and community benefits in way that small sites do not and in light of points raised in the public consultation responses to the Plan"*.
- The inspector considers this focus on strategic Green Belt sites to be *"narrow"* and that this approach *"may have ruled out other non-strategic sites with limited significant impacts on the Green Belt which may have arisen from a finer grained Green Belt Review"*.
- The Council indicated that small sites in the Green Belt were not needed (and were therefore not assessed), a position which is at odds with the overall shortfall situation. The inspector also recognises that this decision to not consider smaller sites in the Green Belt was made in 2013/14, and not in light of the higher levels of housing need (at the time of examination).
- The inspector then states that *"we see no reason why the identification of some smaller sites would unacceptably spread the adverse impacts of development on Green Belt purpose"* and that *"whilst this would extend the impact of development over a wider geographic area, the extent of the resultant impacts would likely be smaller given the more limited scale of the sites"*. Furthermore, the inspector states that small sites have been *"disregarded"* and that this approach has ultimately eliminated *"an important potential source of housing"*. These types of sites are recognised by the inspector as (generally) being able to deliver housing more quickly; provide choice and flexibility in the housing market; and secure affordable housing more immediately.

The site itself has been put forward for consideration on several separate occasions. However, because it was not considered suitable when first assessed in 2009, it has subsequently been dismissed when put forward again in 2016/17/18 without an updated assessment undertaken.

Site Assessment

Before assessing the deliverability of the site, we consider it relevant to provide an indicative Green Belt assessment.

Green Belt Assessment

The Green Belt Review Purposes Assessment (2013) provided an evaluation of potential development parcels, assessing the extent to which these areas contributed towards the purposes of the Green Belt as defined in the NPPF and identifying those areas which could potentially be released from the Green Belt on the grounds of their limited contribution towards the purposes of the Green Belt and their sustainability credentials.

The site formed part of sub-area 'GB25' which covered 522 hectares of land, so can be considered to be relatively high-level. This sub-area was considered as making:

- Limited / no contribution in checking unrestricted sprawl;
- Partial contribution in preventing neighbouring towns from merging and preserving the setting and special character of historic towns; and
- Significant contribution to safeguarding the countryside from encroachment and maintaining the existing settlement pattern.

Sub-area 'GB25' was recommended for further assessment under strategic sub-area 'SA-S8', however the site was not identified for potential urban development. We believe that when undertaking a site-specific assessment against the four pertinent purposes as defined by Para. 134 of the NPPF, there is a case to say that the land lying north of Ragged Hall Lane performs no / limited Green Belt function. This is outlined below:

| Purposes of the Green Belt | Site Assessment | Score |
|--|---|------------------|
| 1. To check the unrestricted sprawl of built-up areas. | The site is well contained by existing buildings to the north and south, meaning if it was released from the Green Belt, the buildings at Westfield Farm to the north would act as a significantly more natural barrier to the sprawl of the urban area. This would provide a more logical settlement boundary and would be a more defensible Green Belt boundary over the plan period. Additionally, the site is partially contained by an established hedgerow along the western boundary and an access road along the east. | No contribution. |
| 2. To prevent neighbouring towns merging into one another. | The site does not currently function as a means of preventing two neighbouring towns merging. As such, its release for development would not result in the merging of two towns or built-up areas in either physical or visual terms. Development would result in a small urban extension to the existing residential properties to the north of Ragged Hall Lane and would terminate at the buildings of Westfield Farm (i.e. infilling the existing gap). Between this northern boundary of Chiswell Green and the southern boundary of St Albans there are various physical and green barriers comprising of an area of open countryside, the A414 and the Netherway Open Space. As such, development of the site would not result in any decrease in this gap as the buildings at Westfield Farm to the north will effectively comprise the northern boundary. The two settlements would continue to be distinctly separated and visually disconnected. | No contribution. |
| 3. To assist in safeguarding the countryside from encroachment | The site is currently performing this function, but the release and subsequent development would only result in limited encroachment into the urban fringe given that it is already bounded by buildings to the north and south, resulting in Westfield Farm as a strong defensible boundary. The site also has a relatively urbanised character resulting from adjacent development on two sides. The landscape is not particularly sensitive or rare and would be able to accommodate the proposed change. | No contribution. |

| | | |
|--|---|------------------|
| 4. To preserve the setting and special character of historic towns | The site is not currently performing this function of the Green Belt. The release and subsequent development of the site would not result in a detrimental impact on the setting or special character of Chiswell Green. The land is not visually prominent and development would not have an unduly adverse heritage impact. | No contribution. |
|--|---|------------------|

The allocation of the site for development would provide the opportunity to create a permanent, clearly defined defensible boundary to the north of Chiswell Green, whilst not unduly harming the openness and function of the wider Green Belt land outside the immediate boundaries of the site. The site would not extend any further east or west than the current outline of the settlement, and both the eastern and western boundaries would be further strengthened by additional planting.

In view of the above, we consider there to be justification in Green Belt terms to bring the site forward for residential development.

Deliverability Assessment

We consider the site to represent a deliverable and developable residential development opportunity. The NPPF requires new Local Plans to provide a five-year supply of deliverable land for housing. ‘Deliverable’ and ‘developable’ is defined within the NPPF as follows:

- **“Deliverable:** *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.*
- **Developable:** *To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”*

The site has strong potential and represents a deliverable and developable residential development opportunity. The site is available; offers a suitable location for development; and delivery is achievable within the first five-years of the Local Plan.

In identifying land for new homes, Para. 67 of the National Planning Policy Framework (‘NPPF’) requires planning policies to *“identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability”*. Part (a) of Para. 67 explicitly references the importance of identifying a supply of *“specific and deliverable sites for years one to five of the plan period”*.

Para. 68 of the NPPF underlines the important role small and medium-sized sites can make in contributing to the housing requirement of an area. Part (a) of Para. 68 states that LPAs should *“identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, unless it can be shown that there are strong reasons why the 10% target cannot be achieved”*. As detailed above, the importance of smaller sites was specifically recognised by the inspectors in their initial response to the withdrawn Local Plan.

The site represents a logical allocation that would align with the requirement in national policy to ensure sufficient sites are identified for delivery in the first five years of the Local Plan, as well as helping to ensure that the Council meet the 10% small-medium sized sites requirement.

The NPPF stipulates that for sites for housing to be considered deliverable, *“they should be available now; offer a suitable location for development now; and be achievable with a realistic prospect that housing will be delivered on-site within five years”*. To be considered developable, *“sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged”*.

Below is our assessment in respect of the site’s availability, suitability and achievability:

Available – The site is in a single land ownership (Acre). There are no identified issues in bringing forward the site for development, and an access point (by virtue of an existing residential dwelling (No. 52) along Ragged

Hall Lane) has been secured. There are no constraints or restrictions in terms of ownership which mean the site cannot come forward in the first five years of the new Local Plan period.

Suitable – We consider the site to be suitable for residential development. It is considered to perform poorly in Green Belt terms and represents an appropriate minor extension to Chiswell Green that would see the boundary of the settlement extended to Westfield Farm (the residential dwelling which bounds the site to the north). In our view, the site represents a logical 'infill' type of development between the row of detached residential dwellings which bound the site (and front Ragged Hall Lane) to the south, and the large residential dwelling at Westfield Farm to the north. By adjoining the settlement boundary, the site is considered to represent a highly sustainable location for future development and, as set out earlier within this document, is within close proximity to local services and facilities, including public transport.

Achievable – Development on the site is considered to be achievable. There are considered to be no insurmountable constraints to development. Chiswell Green is an attractive location for both developers and buyers and therefore we do not consider that development would not be able to commence on-site within the first five years of the new Local Plan.

Development Potential

To demonstrate the site's deliverability and potential capacity, a proposed site layout is included at **Appendix A**. The key details of the site's potential development are listed below:

- The proposed layout makes provision for 43 dwellings. In terms of dwelling types, these would be a mixture of detached, semi-detached and terraced dwellings. In terms of tenure, the proposals would comprise both market and affordable housing.
- The landscape-led proposals make provision for a central area of public open space at the heart of the proposed layout. An additional area of open space is also shown at the northern tip of the site. In addition to this, the layout makes provision for considerable landscaping and planting around the periphery of the site. As well as helping to create a greener sense of place, the provision of planting also helps to create defensible boundaries between the site and the Green Belt / Westfield Farm.
- The net developable area of the site is 1.9 hectares. This equates to a density of 23 dwellings-per-hectare ('dph'). This density has been guided by the setting and the importance of aligning with the surrounding area. We consider 43 dwellings to represent a minimum quantum of development. Should the Council consider a higher density / quantum to be appropriate then the proposed layout can be amended accordingly.
- 43 dwellings at the site would make an important contribution to housing need in the District. Having reviewed the South West Hertfordshire Strategic Housing Market Assessment (2020), St Albans have the second highest minimum housing requirement in South West Hertfordshire over the period 2020 – 2036 at 893 dwellings-per-annum (equating to 26,128 dwellings in total).
- In addition to providing new housing, development of the site would also likely enable the provision of improvements to local infrastructure through financial contributions. The occupation of these residential dwellings would also help to ensure the future of local services and facilities through new local expenditure.

Acknowledging the need for Green Belt land release to be justified by "*exceptional circumstances*" under Para. 136 of the NPPF, we consider such circumstances to exist both on a strategic and more local level, based on our above Green Belt and deliverability assessments. An initial suite of exceptional circumstances are provided below:

- Housing need and the need to ensure that the District meets the minimum housing requirement of 893 dwellings-per-annum (equating to 26,128 dwellings in total) over the period 2020 – 2036 as set out in the South West Hertfordshire Strategic Housing Market Assessment (2020).
- Housing price and affordability issues within the District and wider Market Area.

- Housing mix imbalances and ensuring that the right type of housing (such as market / affordable housing, or senior living) is delivered in the right places in the District.
- The ability of the site to contribute positively to housing delivery and help ensure the District has a positive housing land supply position.
- The fact that the site is available; offers a suitable location for development; and delivery is achievable within the first five-years of the new Local Plan period.
- The development of the site would align with the sustainability directives set out in national and local planning policy.
- The sustainable and accessible location of the site and the fact that it is well-connected to local services and facilities.
- The low performance of the site in Green Belt terms and how development could serve a greater purpose and facilitate a more beneficial use of the site.
- The ability of the site to incorporate areas of publicly accessible open space.
- That the site is not constrained by any environmental or landscape designations.

In summary, we consider the site to be an appropriate and logical residential development opportunity. The site is available; offers a suitable location for development; and delivery is achievable within the first five years of the Local Plan period. The site is under single ownership, and therefore not reliant on land deals involving several parties, nor is it constrained in such a way that impediments future delivery. Given its proximity to existing local services and facilities and the character of the surrounding area, it is our contention that the site represents a sustainable residential development opportunity. The smaller nature of the site would also directly address one of the previous issues identified by the inspectors with the withdrawn Local Plan by seeking to deliver residential development on smaller sites and ensure diversity in terms of housing delivery within the District.

We consider that the site could make an important contribution to ensuring the District's housing land needs are met in full, and would also align with the strategic requirements of national planning policy by identifying a mix of sites (including smaller sites) that can be prioritised for immediate delivery. The site is able to accommodate a minimum of 43 dwellings, and although only identified for conventional residential development at this stage, the site could be available for alternative tenures (such as senior living) should the Council consider this to be appropriate.

We welcome the opportunity to discuss the site with the Council and further engage in the Local Plan preparation process. We are also able to undertake further work and studies to demonstrate the site's deliverability should these be deemed necessary.

Important Notice

Unless you are the Client named within this report, or have been explicitly identified by us as a party to whom we owe a duty of care and who is entitled to rely on this report, Knight Frank LLP does not owe or assume any duty of care to you in respect of the contents of this report and you are not entitled to rely upon it.

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Appendix A | Site Plans