Proof of Evidence of Mr Luke Thurley

Socio-economics – Land South of Shenley Hill, Radlett, Hertfordshire

July 2023

PINS REF: APP/N1920/W/23/3320599

LPA REF: 22/1539/OUT

OUR REF: CD7.7

Contents

1. Executive summary

Background

1.1 On behalf of my company, Volterra Partners LLP (Volterra), I have carried out a socio-economic assessment for the Appellant in order to consider the socio-economics benefits of the Proposed Development. The Appellant is Fairfax Acquisitions Ltd. This proof of evidence deals specifically with four socio-economic benefits, providing evidence that underpins the weighting that the Appellant has attached to these benefits in the planning application.

1.2 The appeal relates to land south of Shenley Hill, Radlett. A full description of the Site and surroundings is provided in the Planning Statement submitted as part of the planning application. The reasons for refusal include impact on the Green Belt, namely that the proposals are considered by the Council to represent inappropriate development not outweighed by very special circumstances and would harm the openness of the Green Belt. In response to this reason for refusal, this proof of evidence presents an assessment of the socio-economic contribution made by the Proposed Development in the local (Radlett) and district (Hertsmere) context.

Housing related benefits – key findings

1.3 Hertsmere Borough Council's (HBC) previous position on housing need in the Core Strategy 2013 (CD3.1) was a requirement for 266 homes per annum, but this is now out of date given that this document is more than five years old. As the HBC Regulation 18 Local Plan has been withdrawn, I have used Planning Practice Guidance to estimate the number of homes required within Hertsmere. Based on my calculations, I estimate that Hertsmere requires 726 homes per year. Over the draft New Local Plan period (2022 – 2038) this equates to a total delivery of 11,621 homes.

1.4 HBC has stated that they have a five year housing land supply (FYLS) of 2.25 (1,713 homes). This compares to a calculated five year housing land requirement of 3,813 homes (726 homes per year, multiplied by the 5% buffer, for five years). This represents a shortfall of 2,100 homes in Hertsmere in the next five years alone.

1.5 Based on the assumption that the Proposed Development's homes are not included within the Council's supply, the Proposed Development provides the equivalent of a 9% contribution to the identified shortfall in the FYLS (2,100 homes). Alternatively, the Proposed Development's delivery of 195 homes equates to between 1.7% of the total updated housing need requirement across the period 2022 to 2038, or 26.8% of the annual requirement.

1.6 The analysis presented in my proof of evidence updates Hertsmere's Housing Delivery Test score for the latest data that is available. My updated analysis shows that based on the latest data available, the HDT score for HBC would fall to 67%-70%, which is below the 75% threshold that HBC utilised in their Committee Report to downplay the housing benefits associated with the Proposed Development.

1.7 In Radlett specifically, my analysis shows that over the New Local Plan period there would be a need between 581 and 898 homes to be delivered, dependent on whether you assign the current Local Plan (5%) or draft New Local Plan (7.7%) target proportion of the overall housing requirement for Radlett. The Proposed Development would account for between 22% to 34% of this required need in Radlett. This is equivalent to 3.5 to 5.4 years of the housing need, over the 16-year period.

1.8 The need for affordable housing across Hertsmere and Radlett is critical. In Radlett in particular, the delivery of affordable housing at the Proposed Development represents an opportunity to create a more diverse and

equitable housing mix, in an area that currently represents an extremely expensive place to live. The Proposed Development's delivery of 88 affordable units is equivalent to 45% available units and goes beyond the policy requirement of 40% in the Core Strategy. The 88 affordable homes are equivalent to 17.5% of the updated annual need outlined in the South West Hertfordshire LHNA (503 homes).

1.9 In Radlett specifically, the Proposed Development will make a particularly substantial contribution to affordable housing need. The delivery of 88 affordable homes is equivalent to between 24% and 38% of the total affordable housing need identified in Radlett within this assessment. This will have a very beneficial effect on an area that is clearly extremely expensive to live, possessing the most expensive LSOA in the borough as of December 2022.

Medical centre relocation – key findings

1.10 The current Red House Surgery is operating at over capacity. April 2023 data shows a headcount of 10 GPs, but only 7.8 GPs were working full time. The number of patients registered is 19,273, resulting in a patient to GP FTE ratio of 2,474. The Red House Surgery is significantly over the benchmark capacity limit, which is 1,800 patients per fully qualified GP FTE. The Council's own evidence confirms that the Red House surgery is substantially over capacity. The Infrastructure Delivery Plan (CD4.21 Table 14) shows that the surgery is 6,085 patients above the number of patients the CCG would ideally allow for based on a 18 patients per sqm standard.

1.11 This constraint on capacity is only expected to worsen in the future, with the surgery's catchment population expected to both grow and age. The ageing population crisis is a nationwide issue, which is poised to increase strain on public health services in the future. Older residents have more complex health needs, take up more time, and cost more to care for. From 2011 to 2021 there was a 19% increase in the number of residents over 65 in the catchment area of the Red House Surgery, compared to a 0.1% reduction in under 65s. My forecasts show that this trend is expected to continue. This would put further constraint on the already constrained Red House Surgery.

1.12 The Proposed Development would provide an enhanced and expanded Red House Surgery. The application includes provision for a purpose built GP Surgery, with an estimated 1.4 times the internal clinical space of the current facility. This already represents a significant benefit to Radlett, and exceeds the demand directly attributable to the Proposed Development's delivery of 195 homes. The new space would provide new services that are unable to be accommodated for at the current facility and offer a wider variety of healthcare services available for catchment of the population.

1.13 The existing site currently supports 7.8 fully-qualified GP FTEs, at a density of approximately 50 sqm (NIA) per FTE GP. Applying this same employment density to the internal areas at the expanded facility could support up to an additional 3.4 fully-qualified GP FTEs at the relocated site. Based on the 1,800 patients per fully-qualified GP FTE ratio, the new facility could support an additional (maximum) 6,100 patients (32% of the current patient list) at the new facility. This number vastly exceeds the maximum number of residents anticipated at the Proposed Development (468), as well as the number of residents anticipated from required future housing growth in Radlett (1,393-2,155 residents). I estimate that adding the 468 residents at the Proposed Development to the future patient list size of the surgery (19,608) to the new figure of 11.2 fully-qualified GP FTEs would result in a revised patient list size per fully qualified GP FTEs of 1,795, substantially below the existing ratio of 2,474.

1.14 If I base the increase in capacity on the 18 patients per sqm benchmark as stated within Hertsmere's own Infrastructure Delivery Plan (CD4.21, paragraph 4.4.23), the increase of 170 sqm (NIA) at the new expanded Red House facility could support an additional 3,056 patients (16% of the existing patient list size). The 170 sqm increase from 390 sqm NIA to 560 sqm NIA would increase the theoretical capacity of the surgery from 7,024 patients to 10,080 patients.

Economic and social benefits – key findings

1.15 Outside of the housing, medical and school related benefits of the Proposed Development, I also estimate the direct socio-economic contribution of the Proposed Development. This includes economic benefits created during both the construction and operational phases. Industry standard approaches to estimating economic impacts are applied. I demonstrate that the operational phase impacts (through increased employment and higher residential expenditure) will result in permanent economic benefits for the local (Radlett) and Hertsmere economy. I show how these permanent benefits align to conditions for significant weight attached to economic growth and productivity, based on paragraph 81 of the National Planning Policy Framework (NPPF) (CD3.9).

1.16 During the construction phase, I estimate that the Proposed Development will support an average of 107 jobs on-site over the 48-month construction period (equivalent to 2% of the 2021 construction workforce in Hertsmere, for context). This amounts to a total of 429 construction jobs over the entire period.

1.17 During the operational phase, the increased size of Newberries Primary School and the relocated (and expanded) Red House Surgery will result in a direct jobs uplift of 27 Full Time Equivalent (FTE) jobs. This will result in an additional worker expenditure in the local area of £35,522 per year. In terms of economic output and fiscal revenues, this uplift in economic activity will result in additional GVA of £1,139,646 being created each year, which is estimated to result in additional tax revenues of between £341,893 and £455,858 annually.

1.18 Once the homes are occupied, I estimate that the total annual residential spending across all goods and services by the 195 households at the Proposed Development will be around £5.5m, of which £3.2m will be in physical outlets (and the remainder online).

1.19 The amount of this spent in locally (in Radlett) is determined using the South West Hertfordshire Retail and Leisure Study (2018). Total expenditure in Radlett by the additional households at the Proposed Development (195 homes) is estimated to be £198,583 per annum (£165,222 on convenience and £33,361 on comparison goods). For context, based on information provided in Appendix E of the South West Herefordshire Retail and Leisure study, the total annual spend within Radlett's comparison and convenience stores in 2017 was estimated to be around £13.3m per annum (£7.6m convenience and £5.7m comparison goods). The expenditure from the Proposed Development for retail is an increase of 1.5% of spending on the annual retail spend in Radlett in 2017 (the latest year for which data is publicly available). This rises to 1.8% of spend in Radlett if combining with the estimated worker expenditure locally.

1.20 The Proposed Development will also deliver social benefits, not least in the form of the provision of affordable housing, for which there is a clear deficiency in both Radlett and Hertsmere more widely currently. I take the analysis a step further by calculating the monetised benefit of health care cost savings from the delivery of affordable housing, in a time where the NHS is fiscally constrained. Following DLUHC Appraisal Guidance, I estimate that the affordable housing health benefit created by the Proposed Development is £18,690 per year from the 88 units at the Proposed Development (undiscounted). Over a 30-year appraisal period, this amounts to a net present value benefit of £433,800.

School expansion land benefits – key findings

1.21 Here, I present evidence on the need for an expanded (1 Form of Entry [fe]) primary school at the Proposed Development. Radlett contains four schools serving primary age children. Newberries primary school is the only school in Radlett identified to have the potential to expand. HBC's own evidence (CD4.21, Table 11) shows that the school has no expansion potential on the existing site. Expansion is stated to only be possible through development on the adjacent site.

1.22 The capacity of primary schools in Radlett is currently highly constrained, with the overall capacity at 99.7%, above the Department for Education (DfE) benchmark of 95%. The Council's SoC argues that there is no current need for primary school expansion. However, my analysis presented here finds that when accounting for required future housing growth in Hertsmere, Radlett would in fact require the need for the safe guarded land at Proposed Development to be provided to Newberries primary school to enable expansion by 1fe.

1.23 The future demand for primary school places within Radlett will depend on the level on the number of homes that come forward within the area. My analysis shows that between 581 and 898 homes are required in Radlett from 2022 to 2038. I then demonstrate that, based on both future housing growth allocated to Radlett under proportions outlined in either the current Local Plan or the Regulation 18 Local Plan, current primary school capacity in Radlett will not be sufficient to accommodate future demand.

1.24 When adding the 1fe expansion as a result of the Proposed Development, capacity in Radlett will expand and future-proof the local area against any future shortfalls in primary school provision through planned total future housing growth. The capacity under the total future housing growth scenarios are forecast to be at between 83% and 88% of capacity, below the DfE benchmark of 95%. Without this extra capacity provided at Newberries, there would be constraints on primary school provision locally (greater than 95% capacity) as a result of future housing growth in Radlett.

1.25 To account for uncertainty in expected primary school demand, I provide an alternative scenario which assumes higher demand per home for primary school students, based on information provided by the Hertfordshire County Council Growth and Infrastructure Unit School in their CIL Compliance Statement (CD4.30). This further justifies the need for a 1fe expansion at Newberries primary school.

Cover sheet – relevant appeals

1.26 My proof relies on evidence from the following appeal: the Land at Little Bushey Lane, Bushey (APP/N1920/W/23/3314268). The appellant agreed a Housing Land Supply Statement of Common Ground with HBC on the 2nd May 2023 (CD5.20). Within this includes the latest assessment of HBCs position on housing requirement for 2023 to 2033, and its five year housing land supply. I use Table 2 on page 7 of this document as a sense check for my own housing needs assessment within HBC. I obtain the same annual housing requirement across HBC for this time period.

2. Introduction

Qualifications

2.1 My name is Luke Thurley. I am an Associate at Volterra Partners LLP. Volterra is an economic consultancy specialising in appraising the economic, social, health, and equality impacts of development and infrastructure. I hold a BSc with First Class Honours in Economics and a MRes with Distinction in Economics, both from the University of Bristol.

2.2 I provide specialist advice to the public and private sectors estimating the economic, social, health and equality impacts of both property developments and policy interventions. I have estimated the socio-economic benefits of a wide range of projects across the country, including new housing developments and developments proposing to provide a range of social infrastructure.

Experience

2.3 I have over 5 years' experience in socio-economic assessment. I have advised on many economic development projects, including socio-economics assessments for a range of residential and mixed-use developments, including: Joyce & Snells Estates Regeneration in Enfield; Battersea Power Station; Euston Over Station Development; Tendring District Council's Levelling Up Round Two applications for Clacton and Harwich & Dovercourt; and a proposed new housing development at Piccotts End near Hemel Hempstead on behalf of the same client I am representing through this statement. All of these studies considered and quantified the value of these areas in terms of their economic importance, through estimating jobs, GVA, taxation, revenues, and overall scope for growth. All of these studies also considered the need for housing in the local area, and assessed whether there was sufficient social infrastructure capacity to accommodate new residents at the development.

2.4 Outside of these projects, I have also worked on a variety of development projects and provided socio-economic assessments on several major regeneration projects including: the Whitechapel Road Life Sciences cluster; the Stevenage Town Centre Life Sciences Campus; Elizabeth House in Waterloo; a range of shared living projects in both London and Bristol; and multiple purpose built student accommodation schemes across London. I am also experienced in building and reviewing models which forecast employment and population, assessing their implications within local areas.

The Proposed Development

2.5 The Proposed Development is located in Radlett, a village within Hertsmere. The proposal includes the delivery of 195 new homes, the safeguarding of land to allow for the future expansion of Newberries Primary School by 1 form of entry (FE), and the delivery of a new medical centre to meet the needs of wider population growth in the local area. Formally, the description of development is as follows:

"Erection of up to 195 new homes (40% affordable), safeguarded land for the expansion of Newberries Primary School and provision of a new medical centre, along with associated access. Outline application to include the matter of ACCESS (with the following matters reserved: APPEARANCE, LANDSCAPING, LAYOUT and SCALE)."

2.6 Since the application was originally submitted, the appellant has submitted a Statement of Case (SoC) in April 2023. Within this SoC, the appellant proposed to increase the affordable housing proportion at the Proposed Development to 45% of total housing units. As such, the Proposed Development will now provide 107 market homes in a mix of sizes, and 88 new affordable homes of varying tenures.

Purpose of this document

2.7 The purpose of this document is to serve as a Proof of Evidence for the appeal against Hertsmere Borough Council (HBC)'s refusal of planning application ref: 22/1539/OUT. The Appellant has submitted a SoC which appeals this decision and provides a summary of the proposed benefits of the scheme. This document provides supporting evidence for the impact of the following benefits of the scheme. These benefits help support the appellant's position on Very Special Circumstances (VSCs). The report is structured as follows:

Housing related benefits

- The delivery of up to 107 new market homes in mix of house sizes; and
- The delivery of up to 88 new affordable homes (of varying tenures).

Medical centre

- The delivery of a new medical centre to ensure healthcare services are able to adequately serve the local population, accounting for both the Proposed Development and wider population growth in the local area.

Economic and social benefits

- The direct and indirect economic benefits, including new construction related jobs and additional spend (and hence induced jobs), arising from the new residents at the Proposed Development;
- Impact of the improvement of the physical environment, biodiversity gain, connectivity improvements, which would constitute in social value and wellbeing benefits for existing and new residents.

School expansion land

- The 0.7ha of land safeguarded for the future 1fe expansion of Newberries Primary School, which will help to support the future population growth at the Proposed Development and within the Local Area when considering population growth from housing need.

2.8 I believe that the evidence which I have prepared and provide for this appeal in this proof of evidence is true. I confirm that the opinions expressed are my true and professional opinions.

Study areas

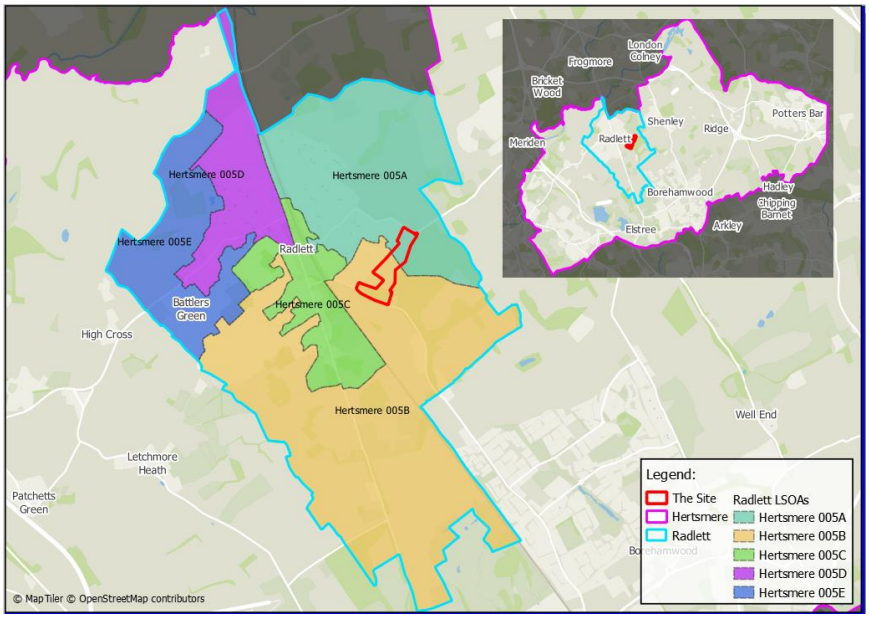
2.9 The study areas used throughout my assessment include Radlett (Local Area), Hertsmere, Hertfordshire, the East of England, and England. **Table 2.1** shows how each of the study areas are defined using statistical boundary areas. These definitions are used for data collection at each level. Note that as Radlett is not pre-defined by statistical boundaries, the Local Area definition is judged to consist of five Lower Super Output Areas (LSOAs)[1] which broadly make up Radlett when observing its urban extent over google maps. **Figure 2.1** provides an illustration of the first two study areas.

[1] LSOAs are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are built from contiguous output areas and have been generated to be as consistent in population size as possible, and typically contain from four to six output areas. The minimum population of an individual LSOA is 1,000 and the mean is 1,500, at the point in time when the LSOA was first defined.

Table 2.1 - geographical definitions

Geographical area	Definition
Radlett (Local Area)	LSOAs: Hertsmere 005A; Hertsmere 005B; Hertsmere 005C; Hertsmere 005D; Hertsmere 005E
Hertsmere	Hertsmere local authority boundary
Hertfordshire	County of Hertfordshire, which contains Hertsmere
East	Region which contains the local authority
England	Country (national)

Figure 2.1 - geographical areas



3. Housing related benefits

3.1 In this section, I discuss the need for housing in both Hertsmere and Radlett itself. Specifically, I compare historic housing delivery in the borough to both the existing and draft (since withdrawn) Local Plans identified housing targets, both in terms of overall housing and affordable housing specifically. My analysis also demonstrates that the Council's 5-year housing land supply is not currently sufficient to meet housing demand. I also demonstrate that if you re-calculate the housing delivery test for the latest year of data, it is clear that Hertsmere's score would now fall below the 75% threshold that the Council utilises in their Committee Report (CD2.2, paragraph 7.5.9)[2] to justify the fact that *"the delivery of the proposed housing within the five year deficit period carries limited additional weight"*.

Housing need in Hertsmere

Past delivery of housing

3.2 **Figure 3.1** demonstrates the past delivery of housing in Hertsmere in comparison to the Core Strategy (CD3.1) target of 266 homes per annum for the entire plan period, 2012 to 2027.[3] Delivery data is presented from two sources:

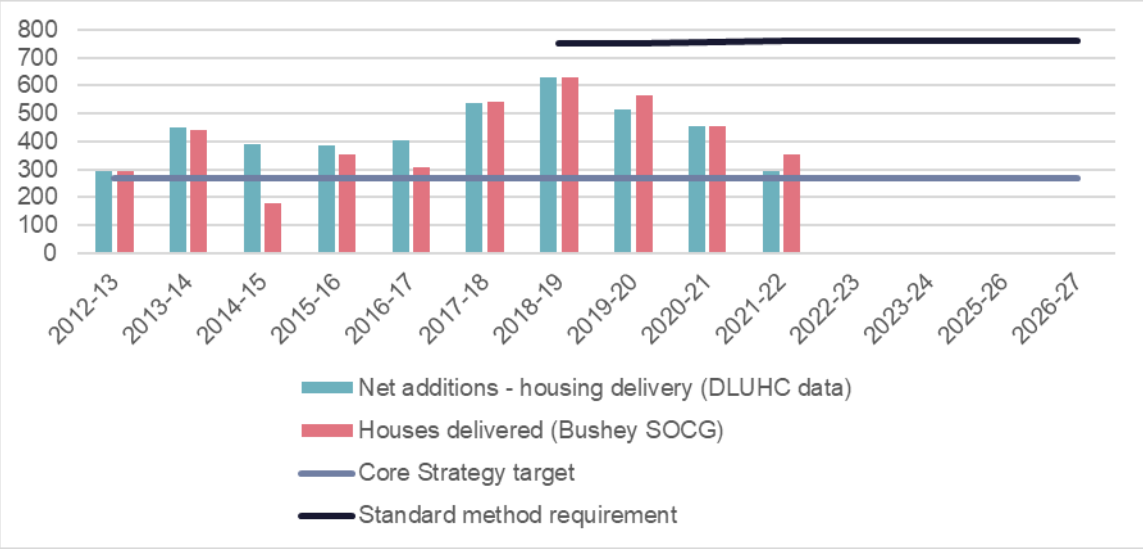
- First, publicly available data on net additional dwellings released by DLUHC is utilised - Table 122 - housing supply; net additional dwellings, by local authority district, England.
- Secondly, another appeal in HBC by Redrow Homes Limited at the Land at Little Bushey Lane, Bushey (APP/N1920/W/23/3314268) has agreed a Housing Land Supply Statement of Common Ground with HBC on the 2nd May 2023 (CD5.20). With this document (hereafter 'Bushey SOCG'), data on housing delivery is provided.

3.3 Hertsmere has exceeded the housing delivery target outlined in the Core Strategy in each year since its adoption in 2012, with the exception of 2014/15, depending on which data source is used. It is understood from the Bushey SOCG that HBC have used the Standard Method to calculate housing requirement since the monitoring year 2018/19, when the Core Strategy became out of date. Since using this higher target, HBC has failed to meet its housing target.

[2] HBC, 23rd February 2023. Committee Report for Application No: 22/1539/OUT

[3] HBC, 2013. Core Strategy.

Figure 3.1 – Houses delivered in Hertsmere has exceeded the Core Strategy target, but falls below the Standard Method requirement, regardless of data source used



Source: DCLG (now DLUHC) and MHCLG, 2023. Table 122 - housing supply; net additional dwellings, by local authority district, England. For alternative housing delivery data, Table 1 in the Land at Little Bushey Lane, Bushey (APP/N1920/W/23/3314268) Housing Land Supply Statement of Common Ground (2nd May 2023) is used.

Housing need forecasts and five year housing land supply

Housing need

3.4 The Council's previous position on housing need in the Core Strategy 2013 (CD3.1) was a requirement for 266 homes per annum, but this is now out of date given that this document is more than five years old.[4] HBC were in the process of updating their local plan.[5] A Regulation 18 draft of this updated plan (CD3.4) was released in October 2021 (since withdrawn). This stated that Hertsmere required a total of 12,160 homes across the plan period (from 2022 to 2038), equivalent to an annual requirement of 760 homes. Of these, 940 of the required homes (7.7%) were allocated to be delivered in Radlett.

3.5 Following public engagement undertaken, a decision was taken at a meeting of the full Council in April 2022 to 'set aside' that version of the plan whilst requesting that officers "continue the local plan process by carrying out additional work as necessary to inform a local plan spatial strategy, whilst awaiting clarity from the Government on changes to law or policy affecting that matter." Yet whilst the withdrawn Plan holds no weight, the evidence produced to underpin does carry significant weight.

3.6 Guidance on housing needs assessments is provided by the National Planning Policy Framework within the Planning Practice Guidance (PPG) for Housing and Economic Needs (CD3.10 and CD3.9).[6,7] HBC's latest

[4] HBC, 2013. Core Strategy.

[5] HBC, September 2021. Draft Hertsmere Local Plan: Regulation 18.

[6] DLUHC, 2020. Planning Practice Guidance: Housing and economic needs assessment. Available at: Guidance: Housing need

[7] MHCLG (now DLUHC), 2021. National Planning Policy Framework.

Five Year Land Supply Update (2021/22) was published in September 2022 (CD4.11). In summary, its calculation of housing need is as follows:

- HBC's assessment of housing requirement is based on the projected increase in households from 2022 to 2032 under the 2014 Projections of 5,168 (517 annually) and an affordability adjustment using a local affordability ratio (2021) of 15.5, creating a standard method adjustment factor of 1.72, given an uncapped requirement of 889 homes per year;
- A 40% cap applies to this given that 889 is greater than the 517 households per year projected;
- This 517 projected housing growth for the area over a 10-year period is greater than the average annual housing requirement figure set out in the most recently adopted Local Plan (266);
- Therefore, the average annual housing requirement is set at 40% above 517, which is equivalent to 724 dwellings per annum; and
- A buffer of 5% needs to be applied to the housing requirement in Hertsmere to ensure choice and competition. As such, the annual housing requirement in the latest published 5-year supply update with a buffer is 760 dwellings, which equates to a requirement of 3,801 over the five-year period.

3.7 Given that this assessment utilises projections based on the projected 2022 to 2032 household growth baseline and the 2021 affordability ratio (published in 2022). Given that this data has now been superseded by more recently released sources, in this assessment I have undertaken analysis which assesses the updated housing need in Hertsmere, based on the most recent data available at the time of writing. I utilise the PPG Housing and Economic Needs method.[8] The steps of this method are outlined in turn within **Table 3.1**. I also provide HBC's original assessment methodology alongside my calculations, to act as a sense check. My calculations align to the appeal a Housing Land Supply Statement of Common Ground in HBC by Redrow Homes Limited at the Land at Little Bushey Lane, Bushey (CD5.20 see Table 2 – page 7).

Table 3.1 – the steps taken to calculate the housing need in Hertsmere 2022 and 2023

Housing requirement table	Hertsmere (2022)	Hertsmere (2023) – my calculations
(A) Step 1: Setting the baseline Average household growth over 10 year period based on 2014-based household projections.[9]	2022 to 2032 data: (49,960 – 44,792) = 5,168 5,168 / 10 = 517 per year	2023 to 2033 data: (50,490 – 45,302) = 5,188 5,188 / 10 = 519 per year
(B) Step 2: Affordability adjustment Calculating the Standard Method adjustment factor using the following equation from the local affordability ratio $\left(\frac{median\ workplace\ based\ earning\ ratio - 4}{4}\right) \times 0.25 + 1$	= 15.5 – 4 = 11.5 $= \left(\frac{11.5}{4} \times 0.25\right) + 1$ = 1.72	= 14.39 – 4 = 10.39 $= \left(\frac{10.39}{4} \times 0.25\right) + 1$ =1.65
(C) Initial adjusted housing need	= 1.72 × 517 = 889	= 1.65 × 519 = 856

[8] DLUHC, 2020. Planning Practice Guidance: Housing and economic needs assessment. Available at: Guidance: Housing need

[9] MHCLG (now DLUHC), 2016. 2014-based live tables: Live tables on household projections: table 406 unitary authorities and districts in England

Housing requirement table	Hertsmere (2022)	Hertsmere (2023) – my calculations
(D) Capping the increase The annual housing need figure © is capped at 40% above the projected housing growth over a 10 year period (A)	= 517 + 40% = 517 + 206.8 = 723.8 = 724	= 518.8 + 40% = 518.8 + 207.523 = 726.32 = 726

Volterra Calculations; HBC, 2022. 5YHLS Statement; Housing Land Supply Statement of Common Ground in HBC by Redrow Homes limited at the Land at Little Bushey Lane, Bushey (CD5.20 – see Table 2 page 7)

3.8 My updated analysis shows that in the current year, 2023, Hertsmere requires a total of 726 homes per year to meet housing needs. This is significantly higher than the adopted core strategy target of 266 homes per year, and broadly in line with the 5YHLS 2022 estimate of 724 homes per year.

Five-year housing land supply

3.9 A buffer of 5% is then applied to this 726 housing need per year figure, to arrive at a housing requirement of 762 dwellings per annum, which equates to a five year housing land requirement of 3,813.

3.10 The Council's latest statement (CD4.11) provided the latest five-year housing land supply (FYLS).[10] At April 2022, the Council's FYLS was 2.25 – this means the sites it has allocated for housing would deliver 2.25 years' worth of the five-year requirement. This is not a strong sign of delivery and as the Council cannot demonstrate a sufficient FYLS, this triggers the "tilted balance". I do not challenge this housing land supply in this proof; instead, I carry forward this 2.25 year supply (1,713 dwellings in total) in my assessment.

Table 3.2 – HBC's 5YLS remains as 2.25 in 2023 which shows a poor signs of delivery

Steps	Figures
Five year land supply requirement	3,813
Five year supply	1,713
Five year housing land supply 2023	2.25
Shortfall in homes	2,100

Source: HBC, 2022. Five Year Housing Land Supply 2021/22; Volterra calculations.

Housing delivery test

3.11 In 2021, HBC's housing delivery test (HDT) score was 88%.[11] A score between 85% and 95% requires the local authority to produce an Action Plan to lay out the steps it will take to increase their housing delivery. HBC produced this Action Plan is September 2022 (CD4.12).[12] The Action Plan notes that large areas of Hertsmere are constrained by Green Belt, with almost 80% of the local authority area designated as such.

[10] HBC, 2022. Five Year Land Supply (FYLS) Update 2021/22. Available at: https://www.hertsmere.gov.uk/Planning--Building-Control/Planning-Policy/Other-guidance-and-information/Annual-Monitoring-Reports.aspx

[11] DLUHC, 2022. Housing Delivery Test: 2021 measurement

[12] HBC, September 2022. Housing Delivery Test Action Plan.

3.12 In HBC's Committee Report (CD2.2, paragraph 7.5.9), it is implied that as HBC's HDT score does not fall below the 75% threshold, the delivery of the proposed housing within the "five-year deficit period carries limited additional weight". For context, when a local authority's HDT score is below 75%, there is a "presumption in favour of sustainable development", whereby planning applications must be granted if they accord with an up-to-date development plan unless the site is protected under the NPPF or the adverse impacts of development significantly outweigh the benefits.

3.13 The HDT is based on 2018/19 to 2020/21 data. Since then, 2022 data on housing delivery has become available. I utilise this more recent data to provide a simple indicative calculation of what HBC's HDT score might look like now, were 2021/22 data to replace 2018/19 data in the calculation. My updated analysis shows that based on the latest data available, the HDT score for HBC would fall to 68%, which is below the 75% threshold that HBC utilised in their Committee Report (CD2.2) to downplay the housing benefits associated with the Proposed Development.

Table 3.3 Updated HDT calculations based on more recent data

Indicator	Year (original)	Hertsmere (2021 original)	Year (updated)	Hertsmere (updated – DLUHC data)	Hertsmere (updated – Bushey SOCG data)
Number of homes required	2018/19	714	2019/20	654	654
	2019/20	654	2020/21	477	477
	2020/21	477	2021/22	760[13]	760
	Total	1,844	Total	1,891	1,891
Number of homes delivered	2018/19	644	2019/20	515	515
	2019/20	515	2020/21	459	459
	2020/21	459	2021/22	294[14]	352
	Total	1,618	Total	1,268	1,336
HDT score (%)	**2021**	**88%**	**2022**	**67%**	**70%**

Source: DLUHC, 2021. Housing Delivery Test: 2021 measurement. Volterra calculations, 2023. Table 1 in the Land at Little Bushey Lane, Bushey (APP/N1920/W/23/3314268) Housing Land Supply Statement of Common Ground.

Housing need in Radlett

3.14 Historically, a very low proportion of HBC's dwellings have been brought forward in Radlett. The allocation of homes in Radlett in the Hertsmere Core Strategy (2013) is outlined in Policy CS2 of the Core Strategy 2013 (CD3.1). Whilst it is acknowledged that housing requirements are not calculated at the settlement level in policy, the document does state that the proportion of Hertsmere housing allocated in Radlett should be "at least 5% percent".[15]

[13] This is assumed in line with calculation for housing need in HBC that uses the 10-year average household projection from 2022 to 2032.

[14] DLUHC, 2022. Table 122 Net additional dwellings1 by local authority district, England 2001-02 to 2021-22

[15] HBC, 2013. Core Strategy 2013

3.15 The table below shows the change in the number of dwellings across the study areas according to the 2011 and 2021 Census.[16] The data shows that in Radlett there has been an increase of only 152 dwellings in the past 10 years, accounting for just 3.9% of additional dwellings delivered in Hertsmere over that decade, despite the fact that Radlett accounts for approximately 8% of total housing supply. This is clearly below the Core Strategy requirement of at least 5% of the allocation coming forward in Hertsmere to be delivered in Radlett. The growth rate of homes here over the past decade (at 4.6%) is less than half the growth seen in HBC as a whole, and considerably below any other comparator geography. These statistics demonstrate an under delivery of housing in this specific local area.

Table 3.4 – Change in the number of dwellings 2011 and 2021 shows Radlett has only met 3.86% of the overall delivery in Hertsmere, which is below the policy requirement.

Study Area	2011	2021	Absolute Change	Percentage Change
Radlett	3,282	3,434	152	+4.6%
Hertsmere	40,993	44,926	3,933	+9.6%
% Hertsmere in Radlett	*8.01%*	*7.64%*	*3.86%*	
Hertfordshire	467,985	503,984	35,999	+7.7%
East	2.5m	2.8m	230,388	+9.1%
England	23.0m	24.9m	2.0m	+8.5%

Source: ONS, 2011 and 2021. Census 2011 dataset QS418EW – Dwellings and Census 2021 dataset RM204 – Number of dwellings

3.16 Policy CS2 of the Core Strategy 2013 states at least 5% of the allocation of homes required in Hertsmere should be within Radlett. In the draft New Local Plan, a proportion of 7.7% of homes delivered in Hertsmere was allocated to Radlett. These two proportional allocations are applied to the 726 homes required per year in HBC to estimate the housing need within Radlett, the results of which are outlined in the table below.

Table 3.5 Housing need in Radlett 2022 to 2038 is between 581 and 898 homes

Scenario	Homes per annum	Total across emerging local plan period 2022 to 2038
Core Strategy allocation 5% of Hertsmere	36	581
Draft emerging Local Plan allocation 7.7%	56	898

3.17 The Council's Infrastructure Delivery Plan Part 2 (CD4.41, Table 7) allows for housing growth of 820 housing units and 60 specialist housing units in Radlett, a quantum which includes the 195 homes being put forward by the Proposed Development. This assumed growth of 820 homes falls within the range I outline in my table above (581 to 898 homes). This suggests that utilisation of this range of future housing delivery in Radlett is robust and reasonable, for the purposes of this assessment.

[16] This data broadly aligns with the ONS net additional dwellings data used in the analysis above. Census data is used here as it provides data at a LSOA level.

Affordable housing need

Affordability

3.18 Houses in Hertsmere are unaffordable. In 2020, the South West Hertfordshire LHNA (CD4.9) estimated that the income required to buy a house in Hertsmere is £67,000.[17] The LHNA also outlines that median household income in Hertsmere was estimated to be £43,700 in 2018.[18] Based on this, the estimated household income required to buy in Hertsmere is 1.53 times higher than the median household income in Hertsmere.

3.19 Radlett is one of the most expensive areas to live in Hertsmere. Median house price data for 2022 by small areas comprising Radlett is shown in **Table 3.6**. Radlett accounts for the three most expensive LSOAs in terms of house prices within Hertsmere. It is clear from the data presented in the table below that both Hertsmere and Radlett face significant affordability pressures, particularly given that Hertsmere is the 3rd most expensive local authority in the East of England and the 21st most expensive nationally (as of December 2022).

Table 3.6 – three LSOAs in Radlett are ranked within the top three highest house prices in 2022.[19]

Radlett house prices rank in Hertsmere	Median house price Dec 2022 (£)	Rank	Rank description (where 1 is highest)
lsoa2011:E01023523 : Hertsmere 005A	1,310,000	3	Rank of LSOA in Hertsmere (62 total)
lsoa2011:E01023524 : Hertsmere 005B	1,825,000	1	Rank of LSOA in Hertsmere (62 total)
lsoa2011:E01023525 : Hertsmere 005C	621,000	19	Rank of LSOA in Hertsmere (62 total)
lsoa2011:E01023526 : Hertsmere 005D	1,375,000	2	Rank of LSOA in Hertsmere (62 total)
lsoa2011:E01023527 : Hertsmere 005E	796,500	7	Rank of LSOA in Hertsmere (62 total)
Radlett average (MSOA – Hertsmere 005)	1,200,000		
Hertsmere	555,000	3	Rank of all local authorities in the East of England (45 total)

Source: ONS, 2023. Median house prices by lower layer super output area: HPSSA dataset 46 – December 2022. ONS, 2023. Median house prices by middle layer super output area: HPSSA dataset 2 – December 2022. ONS, 2023. Median house prices for administrative geographies: HPSSA dataset 9.

[17] GL Hearn, 2020. South West Hertfordshire LHNA

[18] GL Hearn, 2020. South West Hertfordshire LHNA

[19] Note that the data presented here is as of December 2022. The Appellant's Affordable Housing Proof of Evidence presents data on median house prices as of March 2022, as this is the end of the planning monitoring year. This allows for consistency in dates between the completions figures in that proof and median house price data, whereas this proof uses the latest data publicly available.

Past delivery and future need

3.20 Policy CS4 of the Core Strategy (CD3.1) states that there is an affordable housing target of 1,140 from 2012 to 2027, equating to 76 homes per annum. However, the most recent LHNA (CD4.9) finds that Hertsmere requires substantially more affordable homes to be delivered in reality; it identifies a need for 503 affordable homes per year from 2020–2036 across Hertsmere, equivalent to 8,048 affordable dwellings over a 16-year period.

3.21 There has been a historic shortfall in delivery of affordable housing in Hertsmere. As outlined in the Appellant's Affordable Housing Proof of Evidence (CD7.8), "since the start of the 2016 SHMA period in 2013/14, affordable housing completions have averaged just 54 net affordable dwellings per annum, resulting in an accumulated shortfall of -3,418 affordable dwellings between 2013/14 and 2021/22. This is equivalent to an annual average shortfall of -380 affordable dwellings." Furthermore, "against the most recent assessment of affordable housing need (2020 LHNA), a significant shortfall has arisen in just two years. The shortfall equates to -874 affordable dwellings."

3.22 HBC clearly do not have the 5YHLS to create a step change in affordable housing delivery and meet their targets. As outlined in the Appellant's Affordable Housing Proof of Evidence (CD7.8), "if we were to generously assume that all 1,713 dwellings included in the 5YHLS will come forward on sites eligible for affordable housing, and that all of these sites would provide policy compliant levels of affordable housing (i.e. 40%) as a proportion of overall housing completions, this is likely to deliver only 685 affordable dwellings over the period, equating to just 137 new affordable dwellings per annum." This again remains substantially below the target.

3.23 A similar approach can be applied to Radlett specifically. In **Table 3.5**, I demonstrate that the overall housing requirement in Radlett amounts to between 581 and 898 homes per year between 2022 and 2038. If I assume that all of this delivery would be eligible for affordable housing and that the delivery is expected to provide policy compliant levels of affordable housing (40%) as a proportion of total delivery, then there would be an affordable housing requirement of 232 to 359 affordable dwellings per year between 2022 and 2038.

Impact of the Proposed Development

Contribution to housing supply

Overall

3.24 From the evidence I have presented above, the sensitivity of housing delivery within Hertsmere is considered to be particularly high, especially given that HBC are only able to demonstrate less than half of the required FYHLS. This represents a shortfall of 2,100 homes.

3.25 The Proposed Development would make a considerable contribution to the housing need within Hertsmere. For comparison, the contribution would be equivalent to a 9% contribution to the shortfall in the FYLS (2,100 homes). This is based on my assumption that the Proposed Development's homes are not already included in the existing 1,713 homes identified in HBC's supply, given it is not clear in the public documents.

3.26 Based on my calculation (using the guidance) that HBC requires 726 homes to be delivered each year, this amounts to a total delivery requirement of the now withdrawn Regulation 18 Local Plan period (2022-2038) of 11,621 homes. Compared to this, the delivery of 195 homes at the Proposed Development is equivalent to between 1.7% of the updated housing need outlined estimated in Hertsmere across the period 2022 to 2038, or 26.8% of the annual requirement.

3.27 In Radlett the contribution to housing need is very significant. The 195 homes is equivalent to 128% of the total net number of dwellings brought forward within Radlett from 2011 to 2021 – i.e. more than the total net number of homes delivered in the entirety of the last decade. The analysis above shows that over the New Local Plan period, it is likely that Radlett would need between 581 and 898 homes to be delivered. The Proposed Development would account for between 22% to 34% of this required need, a substantial contribution from a single development. The delivery is equivalent to 3.5 to 5.4 years of housing need in Radlett. This is particularly significant in the context of the extremely high house prices and resulting affordability pressure in this part of Hertsmere.

Affordable

3.28 The need for affordable housing across Hertsmere and Radlett is critical. In Radlett in particular, the delivery of affordable housing at the Proposed Development represents an opportunity to create a more diverse and equitable housing mix, in an area that currently represents an extremely expensive place to live. The Proposed Development's delivery of 88 affordable units is equivalent to 45% of available units and goes beyond the policy requirement of 35%-40% in the Core Strategy. The 88 homes are equivalent to 17.5% of the updated annual need outlined in the South West Hertfordshire LHNA (503 homes).

3.29 In Radlett specifically, the Proposed Development will make a particularly substantial contribution to affordable housing need. The delivery of 88 affordable homes is equivalent to between 24% and 38% of the total affordable housing need identified in Radlett within this assessment. This will have a very beneficial effect on an area that is clearly extremely expensive to live, possessing the most expensive LSOA in the borough as of December 2022.

4. Medical centre relocation

4.1 In this section of my evidence, I outline the reasons why the provision of a new medical centre at the Proposed Development will provide a benefit to current and future residents of Radlett, both in the Local Area and at the Proposed Development itself. My analysis looks at existing and future capacity for primary healthcare provision locally, as well as demographic shifts that may cause additional constraints on the NHS in the future. The evidence presented in this section is intended to complement the health evidence provided in Appellant's (Dr Andrew Buroni's) Health Proof of Evidence (Ref CD7.9).

Existing medical centre provision and population

Existing capacity

Policy

4.2 This section outlines the local policy which identifies the need for an expanded Red House Surgery facility within Radlett, Specifically, paragraph 3.66 of the Radlett Neighbourhood Plan[20] (CD3.11) states that:

"It is recognised by the Red House Surgery that the building will be at capacity in in less than 10 years' time, as population grows in Radlett and further demands are put on the already overstretched GP service."

4.3 As this document was published in 2021, it implies that even in the best case scenario, the existing GP surgery (within its current building) will be beyond capacity by 2031. Yet the HBC SoC (CD7.2 paragraph 4.36) acknowledges that the need for expanded primary healthcare capacity in Radlett is somewhat more pressing:

"With all of the above considered, the Council recognise that the information available with regards to medical provision and NHS surgeries both borough-wide and in Radlett specifically indicates that there is somewhat an under provision of medical care."

4.4 To my knowledge there is no other viable alternative - aside from the Proposed Development's proposal to relocate and expand the surgery - yet in place within Radlett to deal with this capacity issue.

Current provision

4.5 The existing population of Hertsmere is 107,827[21] and is served by 11 General Practitioner (GP) surgeries.[22] The number of patients registered at the 11 GP surgeries is 170,580, indicating that some residents residing in neighbouring local authorities utilise these GP surgeries. Each of these surgeries have their own catchments. Some of these catchments span into neighbouring local authorities. Across the surgeries which serve the local authority, the patient to fully-qualified GP Full Time Equivalents (FTE)[23] ratio is 2,352, which makes its provision lower relative to the regional provision 2,419 patients per fully-qualified GP FTE and higher than the national picture 2,314 patients per fully-qualified GP FTE, as seen in

[20] Aldenham Parish Council, 2021. Radlett Neighbourhood Plan.

[21] ONS, 2022. Census 2021.

[22] NHS Digital, 2023. General Practice Workforce, 30 April 2023, Practice level CSVs – April 2023.

[23] Full-time equivalent (FTE) is calculated based upon a 37.5 hour working week. For example, a staff member working 15 hours per week would be 0.4 FTE while someone working four 7.5-hour days would be 0.8 FTE and so on.

4.6

4.7 **Table** 4.1. Historic guidance states the targeted number of patients per fully-qualified GP FTE should not exceed 1,800.[24] NHS organisations, local medical committees and GPs widely use this figure as the guideline safe limit in general practice;[25] Hertsmere, in line with the national trend, is significantly above this benchmark target.

4.8 The Proposed Development proposes to relocate and expand the Red House Surgery. The detailed justification for this relocation is outlined in the Appellant's Health Proof of Evidence (CD7.9), which states that the current surgery has reached its limits of what can be achieved at the current site. The Red House Surgery is currently located on Watling Street (within Radlett's local centre).[26] The Red House Surgery is part of the Herts 5 Primary Care Network (PCN). The total number of full-qualified GP FTEs in this PCN as a whole is 27, who serve approximately 68,036 patients according to April 2023 data. The PCN therefore has a patient to GP FTE ratio of 2,530.

4.9 The Committee Report's consultation section, where a response is provided by NHS England Hertfordshire and West Essex ICB (CD2.2, page 25), provides evidence assessing the scale of impact associated with the Red House surgery relocation using an alternative benchmark equivalent to 2,000 GP per patient ratio,[27] using GP headcount rather than a FTE metric. However, this benchmark is used to calculate a development's financial contribution to healthcare provision, rather than a capacity assessment. GP headcount is not considered to be as useful a measure for assessing capacity given that a growing number of GPs are choosing to work part-time.[28] In August 2022, only 23.2% of doctors at GPs worked full time, with three days' work or less being worked by 58.4% of doctors in 2021.[29] This is causing a further strain on GP provision. In fact, HBC actually use an alternative benchmark to assess primary healthcare capacity within their own Infrastructure Delivery Plan[30] (Ref CD4.21, paragraph 4.4.23), which states that "for the purposes of long term planning, the CCG has adopted a notional alternative calculation based on 18 patients per m^2". It is made clear in the 2021 update (CD4.37, paragraph 4.4.17) that this metric is based on net internal area.

4.10 I therefore use the following two benchmarks to assess primary healthcare capacity within this section, noting that any potential financial contribution would utilise the alternative 2,000 patient per GP metric:

- First, I utilise the 1,800 GP FTE per patient benchmark when assessing the capacity of the Red House Surgery and wider area primary healthcare provision; and
- When looking at the uplift in floorspace provided at the relocated Red House surgery, I also utilise the 18 patients per m^2 metric.

4.11 At the Red House Surgery, April 2023 data shows a headcount of 10 GPs, but only 7.8 GPs were working full time. The number of patients registered is 19,273, resulting in a patient to GP FTE ratio of 2,474. The Red House Surgery is significantly over the benchmark capacity limit.

[24] NHS London Healthy Urban Development (HUDU), 2009. HUDU planning contribution model guidance notes.

[25] 1 in 5 people in England would be without a GP if practices stuck to 'safe limit' | GPonline

[26] Health and social care information centre, 2023. GP catchment areas (England).

[27] A benchmark that the report states is set out in the NHS England "Premises Principles of Best Practice, Part 1 Procurement & Development".

[28] House of Commons Health and Social Care Committee, 2022. The future of general practice.

[29] House of Commons Health and Social Care Committee, 2022. The future of general practice.

[30] HBC, 2021. Infrastructure Delivery Plan. Part 1: Baseline Infrastructure Capacity Report.

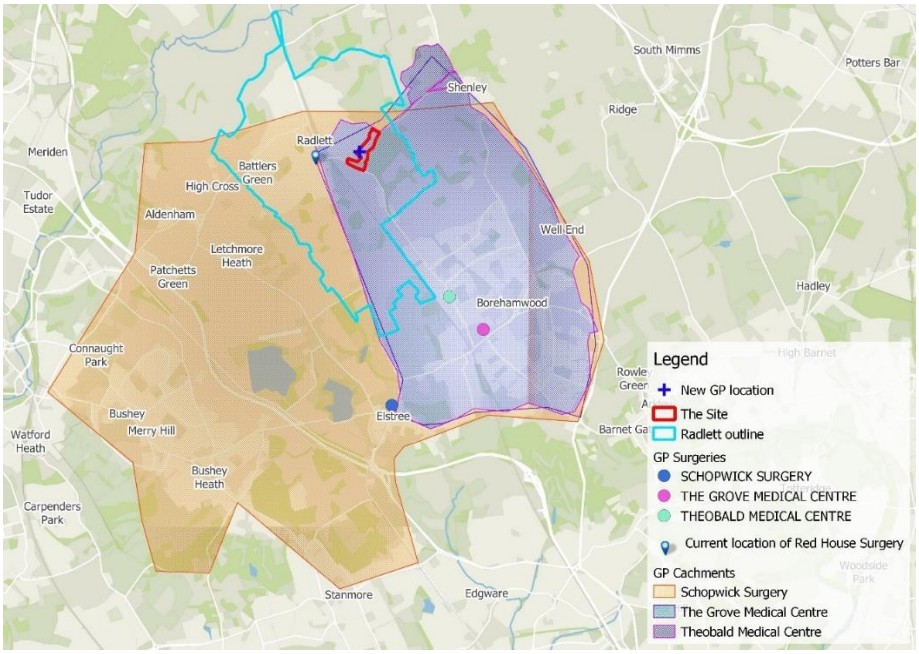
Table 4.1 – patients per GP FTE ratio is higher at the Red House Surgery than all other averages including, the Herts 5 PCN, Hertsmere, and the regional and national average

Location	Patients (a)	GP FTEs (b)	Patient to GP FTE Ratio (a/b)
Red House Surgery	19,273	7.8	2,474
Herts 5 PCN	68,036	27	2,530
Hertsmere	107,827	73	2,352
East of England	7,170,929	3,798	2,419
England	62,418,295	35,279	2,314

Source: NHS Digital, 2023. General Practice Workforce, 30 April 2023, Practice level CSVs – April 2023. Volterra calculations, 2023. These calculations all use the same dataset and methodology to ensure consistency of the analysis across geographies.

4.12 There are three other surgeries that capture parts of the Radlett population. These include the Grove Medical Centre (2.6 miles away from Red House Surgery), Theobald Medical Centre (2 miles away from Red House Surgery), and Schopwick Surgery (2.8 miles away from Red House Surgery). These are all located more than 2 miles away from the Site. As shown in **Figure 4.1**, the catchments do not cover the whole of Radlett and they are located outside of Radlett's boundary. I exclude these as substitutes, as the Council are concerned with the reprovision of the Red House Surgery within the Local Area in their existing evidence.

Figure 4.1 – shows the catchment of GPs that are not included in the assessment due to being located outside of the local area

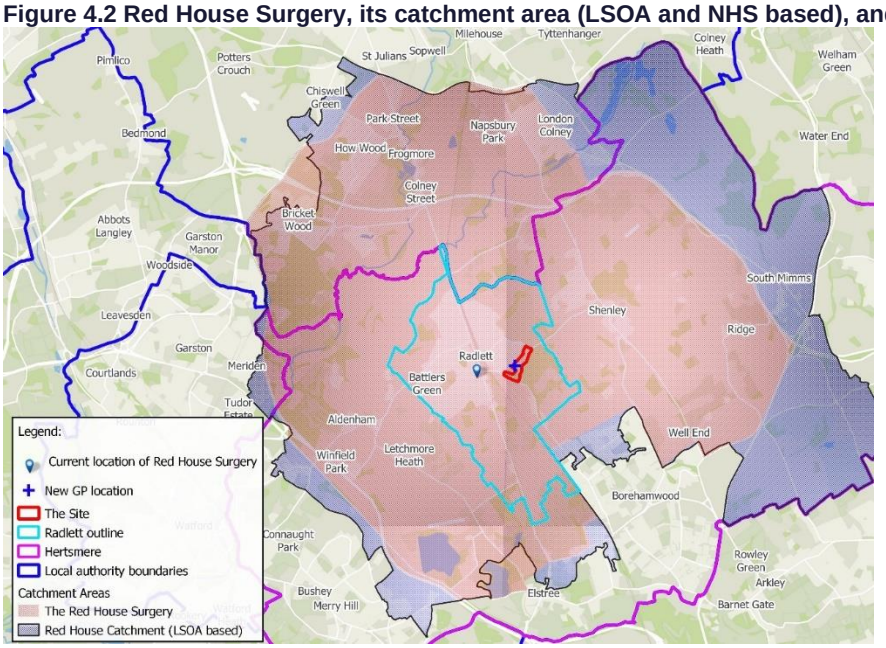


Existing population

4.13 The Red House Surgery catchment is shown in the red shaded area in **Figure 4.2**, along with the current and proposed relocation of the Red House Surgery. The map shows that the relocation would move the surgery only 660 metres away from the existing site (an approximate 9-minute walk or a 3-minute car or bike ride),[31] and in the context of the catchment, could remain central to it and readily accessible to residents of the catchment.

4.14 The catchment of the Red House Surgery serves the entirety of Radlett, Aldenham West, Shenley, and some parts within the southern areas of St. Albans (namely Park Street, London Colney, and Bricket Wood), and the northern half of Elstree. The population for the exact catchment area is not available due to statistical limitations. Instead, the LSOAs which on visual inspection make up the catchment area are used as a proxy. The LSOAs that are included in our proxy ('best fit') definition of the catchment area are outlined by the blue shaded area in **Figure 4.2**; there are 30 LSOAs that comprise this area in total.

Figure 4.2 Red House Surgery, its catchment area (LSOA and NHS based), and proposed reprovision



Source: Map Tiler; Health and social care information centre, 2023. GP catchment areas (England)

4.15 The 2021 Census estimates the existing population in Hertsmere to be 107,827.[32] The Radlett population is 8,193, and the population of the blue shaded area in **Figure 4.2** is estimated to be 47,856. **Table 4.2** shows the population change since 2011 in Hertsmere, Radlett and the Red House Surgery catchment (LSOA based proxy) area. The population of the Red House Surgery catchment has risen by 3% since 2011. This is higher than the population growth in Radlett, but below the Hertsmere level. The total patient list size of 19,273 at the Red House means the Surgery is estimated to currently serve approximately 40% of the total population in its catchment area.

[31] Google, 2023. Google maps.

[32] ONS, 2021. Census Data: TS007 – Age by single year

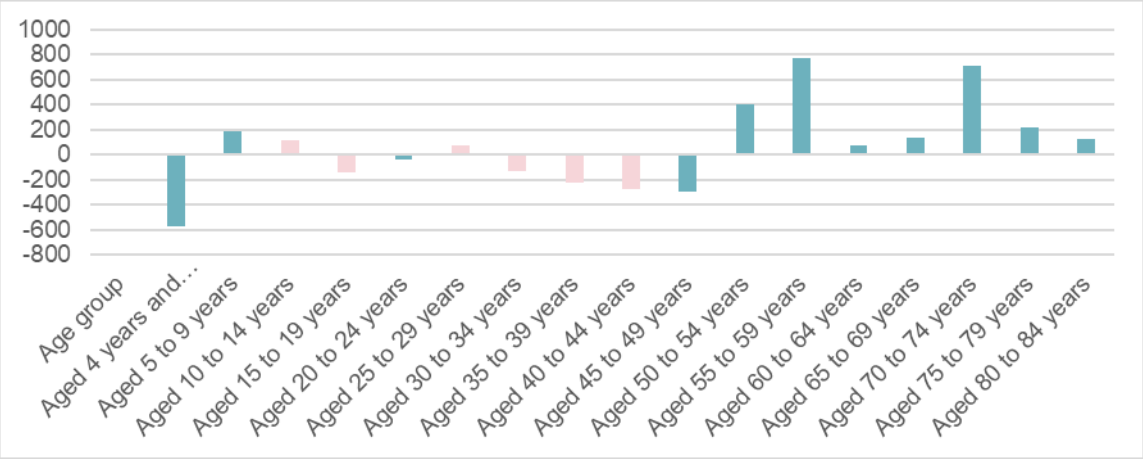
Table 4.2 - the population of the Red House Group Surgery (LSOA based) catchment has risen faster than the population of Radlett over the ten year period

Study Area	2011	2021	Change
Radlett	8,163	8,193	0.4%
Hertsmere	100,031	107,827	7.8%
Red House Group Surgery Catchment (LSOA based)	46,435	47,856	3.0%

Source: ONS, 2021. Census Data: TS007 – Age by single year; ONS, 2021. Census Data: QS103EW – Age by single year

4.16 My analysis of the changing age structure in the Red House Surgery catchment area from 2011 to 2021 finds a rise in the number of residents aged 50 and over, see **Figure 4.3**.[33] Since 2011, there has been an increase of 1,445 residents over 65 within the Red House Surgery catchment area, a 19% uplift. This is in contrast to a reduction of 20 residents aged 64 or younger (a reduction of 0.1%). Clearly, there is an ageing population within the Red House Surgery catchment area. This ageing population trend is mirrored in Radlett, as **Table 4.3** shows.

Figure 4.3 – change in Red House Surgery catchment population (2011 to 2021) by 5-year age group shows a large increase in residents aged over 50



Source: ONS, 2021. Census Data: TS007 – Age by single year; ONS, 2021. Census Data: QS103EW – Age by single year

Table 4.3 – the change in population by age group in all areas shows a higher change in the population of older residents (2011 to 2021)

	Red House Surgery Catchment (LSOA-based)	Radlett	Hertsmere	Hertfordshire
Total population change	1,421	26	7,796	82,731

[33] ONS, 2021. Census Data: TS007 – Age by single year; ONS, 2021. Census Data: QS103EW – Age by single year

	Red House Surgery Catchment (LSOA-based)	Radlett	Hertsmere	Hertfordshire
(2011 to 2021)				
Change in population 50 and over	2,686 (+17%)	456 (+15%)	5,681 (+16%)	64,601 (+17%)
Change in population 65 and over	1,442 (+19%)	219 (+15%)	2,811 (+17%)	30,353 (+17%)
Change in population under 50	-1,265 (-4%)	-426 (-8%)	2,115 (+3%)	18,130 (+2%)
Change in population under 65	-21 (-0.1%)	-189 (-3%)	4,985 (+6%)	52,378 (+6%)

Source: ONS, 2021. Census Data: TS007 – Age by single year; ONS, 2021. Census Data: QS103EW – Age by single year

Burden on the NHS

4.17 Whilst the increase in life expectancy has many benefits to society and shows an overall improvement in national health outcomes, the number of elderly people who require health services is increasing (CD4.15).[34] An ageing population results in an increase in healthcare expenditure through the following two streams:

- The increase in health spending to meet the requirements for a larger population; and
- and health spending increases proportionally with the number of older people in the population.

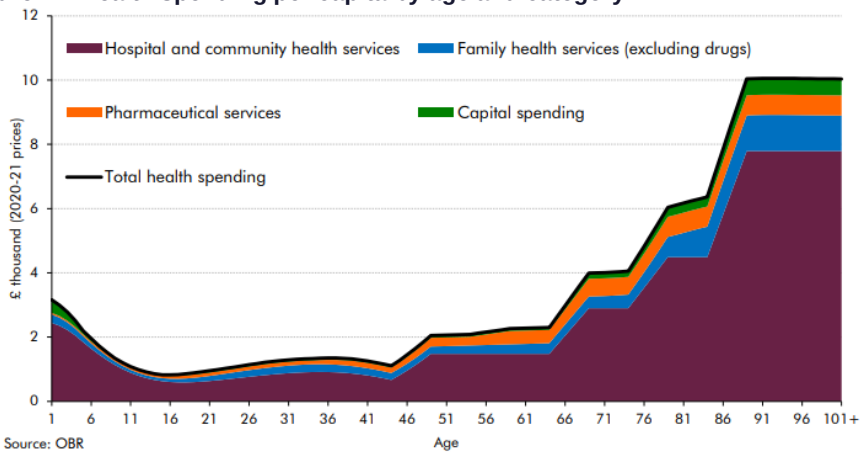
4.18 Per capita health spending is typically higher for the old than the young. **Figure 4.4** shows the Office for Budget Responsibility's (OBR) health spending per capita model by age group forecast for 2020/21, broken down by the following services:

- **Family health services (excluding drugs)** – primary health care services, GP and dental services, but excludes pharmaceutical services;
- **Hospital and community health services** – secondary health care services (services provided after referral from primary care services), accounts for the majority of health spending;
- **Pharmaceutical service** – includes elements of primary care related to drug prescriptions; and
- **Capital spending** – investment from central and local government.

4.19 The graph shows that beyond early childhood, the older a person, the higher the average per capita spending on all health care services. Whilst the report states that this is not the only cause of higher spending, it does show that the cost for caring for people increases with age.

[34] OBR, 2016. Fiscal sustainability and public spending on health.

Figure 4.4 Health spending per capita by age and category



Source: OBR, 2016. Fiscal sustainability and public spending on health (CD4.15).

4.20 Demand for GPs are rising and GPs are serving more people than ever before (CD4.14).[35] The total number of appointments in GPs in England increased by 2.1m appointments (an 8.9% increase) from June 2019 to June 2022 (this excludes Covid-19 vaccination appointments). The number of registered patients has also grown over this period from 59.9m to 61.7m. The ageing population places further burdens on health as health needs are becoming more complex, as older people tend to have multiple medical conditions.

> **"Patients are increasingly dissatisfied with the level of access they receive. The root cause of this is straightforward: there are not enough GPs to meet the ever-increasing demands on the service, coupled with increasing complexity of cases from an ageing population."**

Source: House of Commons Health and Social Care Committee, 2022. The future of general practice (CD4.14)

4.21 The coronavirus pandemic identified the failures and fragilities in the current health care system. It showed that systems need to be prepared for future health conditions. The evidence above demonstrates the ageing population issue is already causing an issue due to greater frequency, complexity and costs which the current system is struggling to respond to. It is clear that older health care facilities which are at capacity and with no expansion potential need to be replaced and expanded, especially in areas with high proportions of elderly residents.

Future population forecast

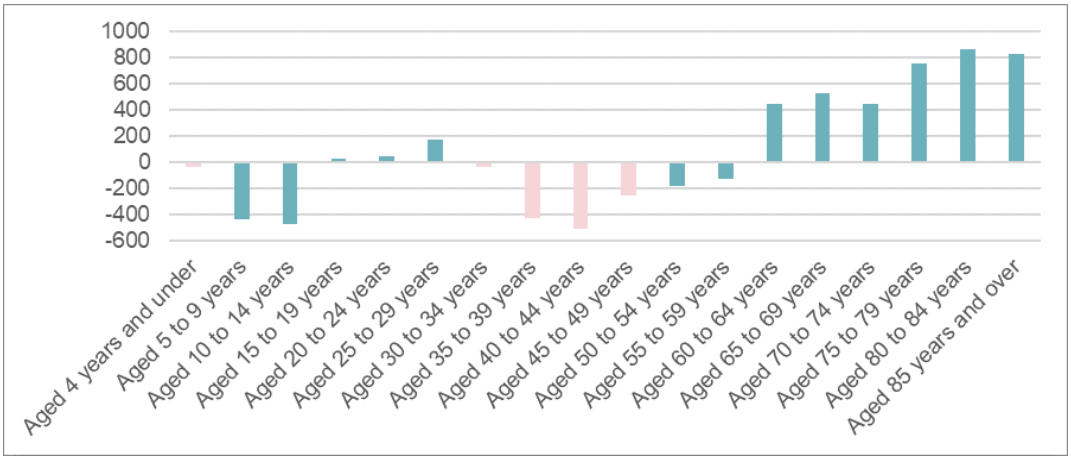
4.22 The past trends for the population of the Red House Surgery catchment area shows an ageing population (**Figure 4.3**). Forecasting how the population of the catchment area would likely change in the future can help to understand the likely future provision and requirement of the Red House Surgery. To assess this, I have applied a Compound Annual Growth Rate (CAGR) for the 2018 ONS population projections for each

[35] House of Commons Health and Social Care Committee, 2022. The future of general practice.

single year of age Hertsmere is estimated. This gives the incremental change in age group per year from 2018 to 2043. This CAGR is applied to the 2021 Census population of Red House Surgery catchment.

4.23 The forecasting exercise finds that the aging population is expected to increase in the future, see **Figure 4.5**. The estimated change to the total population of the catchment by 2043 is expected to increase by 1,660 residents, and the population of over 65s is expected to increase by around 3,410 residents, compared to a reduction in 1,835 residents under 65. Therefore, pressure on the Red House Surgery would increase from both the increase in residents, and the higher proportion of those over 65.

Figure 4.5 Red House catchment population change, 2021 to 2043



Source: ONS, 2018. Population projections for local authorities; Volterra calculations.

4.24 As outlined in the Appellant's Health Proof of Evidence (CD7.9, para 1.5.17), "in the absence of new homes populations do not just stop growing, they continue to increase, albeit with higher household densities or having to relocate elsewhere. For the former, this tends to compound health burdens and increase health care demand, and for the latter, this tends to sever family and social support networks, increasing social and health care demand." The Radlett Neighbourhood Plan (CD3.11) identifies that the existing Red House Surgery will be at full capacity in less than 10 years. This was published in 2021, which gives approximately eight years (to 2031) before capacity limits are breached. I have conducted analysis on what the capacity of the Red House Surgery would be at by 2031, based on the 2031 population of the catchment area and using the existing Red House Surgery population to patient ratio of 40% (see **Paragraph 4.15**). Results are shown in **Table 4.4**.

Table 4.4 – shows the capacity of Red House Surgery in 2031 will be even more constrained by 2031

Step	Values
Catchment Area 2031 population (a)	48,687
Number of patients (b) = (a) * 40.2729%	19,608
Number of GPs at existing surgery (c)	7.8
Patients per fully qualified FTE GP at 2031 (b) / (c)	2,517
Patients per fully qualified FTE GP current (for comparison)	2,474

Source: Volterra calculations, 2023.

Impact of the Proposed Development

4.25 The evidence I have presented shows that the current surgery is operating at over capacity. Further to this, demand is expected increase in the coming years as the population of the surgery's catchment is expected to not only grow but also to age, creating more demand for healthcare.

4.26 The Proposed Development would provide an enhanced and expanded Red House Surgery. The application includes provision for a purpose built GP Surgery, with 1.4 times the internal clinical space of the current facility. This already represents a significant benefit to Radlett, and exceeds the demand directly attributable to the Proposed Development, as I demonstrate below. As outlined in the Appellant's Health Proof of Evidence (ref CD7.9, para 1.6.4):

4.27 *"this overprovision is intentional to provide staff amenities and improve working conditions, which is critical to retaining and enticing staff, but also improves patient experience while building in spare capacity to accommodate the future needs of Radlett. Equally, the overprovision of internal space, coupled with adaptable multifunctional rooms means additional health care and health promotions services can be provided over and above that currently. The spare rooms can be let out to chiropractors, osteopaths, physiotherapists, baby ultrasound screening, reflexology, acupuncture and health promotion and support initiatives (e.g. dementia awareness and management)."*

4.28 Below I estimate the impact on capacity difference between the new facility and the existing Red House Surgery, through two different methods. I show that based on capacity benchmarks the new facility could serve between 16% and 32% more patients than the existing facility.

Benchmark one: 1,800 patients per fully-qualified FTE GP

4.29 The new medical centre would provide an estimated 560 sqm of net internal (NIA) floorspace. This is 170 sqm more than the existing site, the floorspace for which has been obtained from the Valuation Office Agency website. The existing site currently supports 7.8 fully-qualified GP FTEs, at a density of 50 sqm (NIA) per FTE GP.[36] Applying this same employment density to the internal areas at the expanded facility could support up to an additional 3.4 fully-qualified GP FTEs at the relocated site. Based on the 1,800 patients per fully-qualified GP FTE ratio, the new facility could support an additional (maximum) 6,100 patients (32% of the current patient list) at the new facility. This number vastly exceeds the:[37]

- Maximum number of residents anticipated at the Proposed Development – 468;
- Maximum number of residents anticipated within the future growth of 581 homes in Radlett (refer to **paragraph 3.27**) – 1,394; and
- Maximum number of residents anticipated within the future growth of 898 homes in Radlett (refer to **paragraph 3.27**) – 2,155.

4.30 I estimate that adding the 468 residents at the Proposed Development to the future patient list size of the surgery (19,608) to the new figure of 11.2 fully-qualified GP FTEs would result in a revised patient list size per fully qualified GP FTEs of 1,795, substantially below the existing ratio of 2,474.

Benchmark two: 18 patients per sqm

4.31 If I base the increase in capacity on the 18 patients per sqm benchmark as stated within Hertsmere's own Infrastructure Delivery Plan[38] (CD4.21, paragraph 4.4.23), the increase of 170 sqm (NIA) at the new

[36] VOA, 2023. Rating list downloads: 2023 non domestic rating list summary valuations 01.

[37] Population is calculated by multiplying the number of homes by 2.4, in line with local guidance released by the Hertfordshire and West Essex ICB.

[38] HBC, 2021. Infrastructure Delivery Plan. Part 1: Baseline Infrastructure Capacity Report.

expanded Red House facility could support an additional 3,056 patients (16% of the existing patient list size). Again, this is a significant increase in comparison to the 468 maximum additional patients expected to arise from residents at the Proposed Development. The 170 sqm increase from 390 sqm NIA to 560 sqm NIA would increase the theoretical capacity of the surgery from 7,024 patients to 10,080 patients.

5. Economic and social benefits

5.1 In this section of my evidence I estimate the direct socio-economic contribution of the Proposed Development. This includes economic benefits created during both the construction and operational phases. Industry standard approaches to estimating economic impacts have been applied. This section demonstrates that the operational phase impacts (through increased employment and higher residential expenditure) will result in permanent economic benefits for the local economy.

5.2 I outline how the Proposed Development meets the conditions for significant weight on economic benefits outlined in paragraph 81 of the NPPF (CD3.9). This states that *"significant weight should be placed on the need to support economic growth and productivity, taking into account local business needs* and *wider opportunities for development"*. I conclude the section with presenting a summary table of permanent economic and social benefits.

Economic benefits

Construction phase

Direct jobs

5.3 The construction of the Proposed Development would result in additional economic activity in terms of construction jobs and spending. A standard method of estimating the number of construction workers at the site is to divide the expected cost of construction by the Gross Value Added (GVA) of the average construction worker.[39]

5.4 It is estimated that the construction phase of the Proposed Development would support an average of 107 jobs on-site over the 48-month construction period (equivalent to 2% of the 2021 construction workforce in Hertsmere, for context).[40] This amounts to a total of 429 construction jobs over the entire period.

Construction worker expenditure

5.5 Construction workers are one of the most mobile sectors of the workforce, travelling to wherever the work is. As a result, construction benefits are not generally viewed as having large local impacts. However, their expenditure does have a local impact. I estimate that construction workers on-site would spend £241,140 in the local area each year, which equates to a total of £964,560 over the four year construction period.

[39] ONS, 2022. Regional gross value added (balanced) by industry 2019; ONS, 2022. Business Register and Employment Survey 2019.

[40] ONS, 2021. Business Register and Employment Survey.

5.6 Total worker expenditure is based on a recent source estimating London based office worker expenditure of £13 per day in 2020.[41] This is adjusted to reflect (i) inflation growth from 2020 to 2023; (ii) the earnings differences between London and the East of England; and (iii) the discrepancies between earnings in construction and office sector are also accounted for. From this, the daily spend for a construction worker in 2023 in the East of England is estimated to be £10.21 per day.

Operational phase

5.7 The Council's SoC states (CD7.2, paragraph 4.46) that the economic benefits would be mainly temporary:

"would argue, even with the lack of information, that economic benefits would be mainly temporary and the social benefits have not been evidenced to be meeting any particular deficiency."

5.8 In the section below I outline the operational phase economic impacts of the Proposed Development, all of which are considered to be permanent (i.e., long term) in nature. This includes the associated economic impacts from the expansion of 1fe at Newberries Primary School, the new relocated Red House Surgery, and the increase in local expenditure from residents at the Proposed Development.

5.9 The permanent economic benefits that the Proposed Development creates satisfies the second condition of paragraph 81 of the NPPF for significant economic growth and productivity, by taking into account wider opportunities for development. The Proposed Development captures housing, healthcare, and educational benefits under one proposal, which I quantify below. These clearly can be considered as inducing wider opportunities for development. In addition to this, given there has been such a low levels of growth in Radlett within these sectors (particularly housing) over the last decade, with no other major housing developments planned to be brought forward locally (to my knowledge), the permanent benefits delivered by the Proposed Development can be considered additional in the local context, and likely not be delivered otherwise.

Direct employment

5.10 The direct employment created by the Proposed Development will fall within the foundational economy, which is the part of our economy that creates and distributes goods and services that residents rely on for everyday life.

Red House Surgery expansion and reprovision

5.11 The current Red House Surgery has approximately 390 sqm NIA,[42] which supports a total of 26 FTEs according to NHS digital data. The breakdown of FTEs to specific occupational roles is provided in **Table 5.1**. The expansion of the proposed relocated Red House Surgery is estimated to be a total of 560 sqm (NIA), which is calculated based on assuming that 80% of total GIA (700 sqm) will be NIA, in line with HCA Employment Density Guidance. This is approximately 1.4 times larger than the existing Red House Surgery.

5.12 To estimate the increase in the direct jobs from the expansion of the Red House Surgery, I apply the ratio of 1.4 to the existing Red House Surgery FTEs, as outlined in **Table 5.1**. In total, it is estimated that the expanded facility would support **37.7 FTEs,** representing an uplift of **11.4 FTEs**.

[41] GLA, 2020. Lost worker vs. tourism expenditure in the Central Activities Zone (CAZ).

[42] VOA, 2023. Rating list downloads: 2023 non domestic rating list summary valuations 01.

Table 5.1 – the total number of FTEs the existing Red House Surgery supports is 26. The expanded facility will support 1.43505 times the number of FTEs

Job role	FTEs current	FTEs expanded
GPs	7.8	11.2
Nurses	1.4	2.0
Direct Patient Care (DPC)	0.5	0.7
Admin	16.5	23.7
Total	26.3	37.7

Source: NHS Digital, 2023. General Practice Workforce, 30 April 2023, Practice level CSVs – April 2023.

Newberries Primary School expansion

5.13 The existing Newberries Primary School is 1fe. The breakdown of the number of FTEs by occupational role is provided by the ONS and outlined in **Table 5.2**. The school currently supports 21 FTEs in total at a 1fe capacity. The proposal to provide safeguard land will allow the school to expand from 1fe to 2fe.

5.14 An expansion from 1fe to 2fe will increase the number of jobs available at Newberries Primary School. Yet it is not reasonable to assume that expanding the school will simple double the jobs, given efficiencies that can be made within some existing roles. Therefore, I conservatively assume that only the number of classroom teachers and teaching assistant double in the expansion. This leads to an estimate of the expanded school supporting **36 FTEs**. I have sense checked this estimate against the employment currently supported at the nearby 2fe Hertsmere Jewish Primary School, which ONS data suggests supports 42 FTEs currently.[43] This slightly higher estimate intuitively makes sense, given the school supports children aged 3-11, compared to 4-11 at Newberries Primary School.

Table 5.2 – Newberries Primary School currently supports a total of 21 FTEs. The expansion of 1fe would result in the increase of 15.2 FTEs

Job role	FTEs current	FTEs expanded
Head teacher	1.2	1.2
Deputy head teacher	0.2	0.2
Assistant head teacher	1.0	1.0
Classroom teacher	8.3	**16.6**
Teaching assistants	6.8	**13.7**
Administrative staff	1.8	1.8
Auxiliary staff	1.7	1.7
Total	**21.1**	**36.2**

Source: ONS, 2023. School Workforce Census: Datasets: workforce teacher characteristics school 202223 and workforce support staff characteristics 202223

[43] ONS, 2023. School Workforce Census: Datasets: workforce teacher characteristics school 202223 and workforce support staff characteristics 202223.

Worker expenditure

5.15 The additional workers at the Proposed Development would bring greater spending to their respective local areas. As discussed in **paragraph 5.45.5** the total worker expenditure of an office worker London was estimated to be £13 per day in 2020.[44] Adjusting for inflation, accounting for earnings differences between London and the East of England, and the income differences between office workers and education and health workers, finds that the estimated daily spend for workers in the education and health sector in 2023 for the East of England are £7.46 and £7.48 respectively. The total additional annual worker expenditure of **£35,522** is found by applying these daily spend amounts to the additional FTEs at Proposed Development and assuming that there are 220 working days in one year.[45]

Gross Value Added (GVA)

5.16 The increase in employment at the Proposed Development would result in additional economic output, known as GVA. GVA is the additional economic value generated by economic activity. The GVA impact of a development is estimated by multiplying the FTEs in each sector by the annual GVA per FTE in that respective sector. The table below shows my estimates for the uplift in GVA generated by the increase in FTEs caused by the Proposed Development, as outlined in **Table 5.1** and **Table 5.2**. Total additional GVA generated is **£1,139,646** per year (see **Table 5.3**). This is equivalent to 0.4% of the combined GVA of the education and health sector in Hertsmere in 2018, for context.[46]

Table 5.3 – total additional GVA generated form the uplift in FTEs is £1,139,646

Use	GVA per FTE (Herts)	Existing GVA	Uplift in GVA from Proposed Development	Additional impact
Education (Newberries Primary School)	£55,664	£1,461,517	£2,097,352	£635,835
Health (Red House Surgery)	£44,106	£1,158,051	£1,661,862	£503,811
Total additional GVA				**£1,139,646**
Education and health combined Hertsmere GVA 2018 (context)				**£293,000,000**

Source: ONS, 2022. Regional gross value added (balanced) by industry: all ITL regions; ONS, 2018. Regional gross value added (balanced) by local authority in the UK; Volterra Calculations

Taxes

5.17 By comparing national statistics on GVA in the years 1997 to 2017 with public sector receipts in each year, it can be estimated that tax revenues typically account for between 30% and 40% of GVA.[47] This is generated through business rates, VAT, corporate and income tax (among other smaller taxes). Applying this to the

[44] GLA, 2020. Lost worker vs. tourism expenditure in the Central Activities Zone (CAZ).

[45] This is split accordingly: (i) £24,877 expenditure from the additional workers at the school and (ii) £10,645 expenditure from the additional workers at the medical centre.

[46] ONS, 2018. Regional gross value added (balanced) by local authority in the UK

[47] ONS, 2019. Public sector finances and ONS, 2018. Regional gross value added (income approach)

additional GVA generated by the Proposed Development, I estimate that the Proposed Development would result in additional tax revenues of between **£341,893** and **£455,858** each year.

Household expenditure

5.18 The Proposed Development is expected to deliver 195 homes (107 market homes and 88 affordable). The residents would provide an injection of spending into Radlett's local economy. This spending can induce jobs in the local area and further away which helps the local and wider economy to thrive.

5.19 I have used the following method is used to obtain the local area spending by each new household in Radlett. The English Household Survey weekly household expenditure by region shows that total weekly spending by East of England households is on average £494.50. Uplifting this by 1.04, which is the earnings differential between Hertsmere and the East of England average earnings gives £511.98. This is for an average household size of 2.4. Households in Hertsmere are on average 2.53 (5% higher than the East of England average). Accounting for this and average weekly expenditure for Hertsmere households is approximately £538.92. The total annual residential expenditure across all goods and services by the 195 homes at the Proposed Development is therefore estimated to be around **£5.5m** per year.

5.20 An adjustment is made to account for online spending.[48] This takes the total weekly expenditure in physical outlets down to an estimated £316.45. In total, the additional physical expenditure generated by the new homes at the Proposed Development after accounting for online spending is **£3.2m** each year (this reflects the amount spent in physical outlets).

5.21 It is difficult to ascertain where all this spending will take place with accuracy. A proxy can be made by utilising the local retail study. Based on spending patterns outlined in the South West Hertfordshire Retail and Leisure Study (2018) (CD4.16), it is likely 31% will take place in Hertsmere and just over 91% will take place in the five South West Hertfordshire districts (Hertsmere, Watford, St. Albans, Dacorum, and Three Rivers).[49] In absolute terms this would amount to approximately **£1.05m** and **£2.9m** being spent by residents of the Proposed Development in Hertsmere and South West Hertfordshire respectively, each year.

5.22 The weekly (in-store) household spending on convenience goods[50] is £79.69 and on comparison goods[51] is estimated to be £91.63 per home at the Proposed Development. This represents an annual spend at an individual household of £4,144 on convenience goods and £4,765 on comparison goods.

5.23 The amount of this spent in locally (in Radlett) is determined using the South West Hertfordshire Retail and Leisure Study (2018).[52] This provides the spending patterns of residents based in different zones. Zone 4 provides information for residents in Radlett & Shenley. Spending pattern of Zone 4 residents show approximately 20% of convenience and 4% of comparison goods expenditure takes place in Radlett. Applying these proportions finds that in total, a Radlett household spends approximately £847.29 on convenience goods and £171.08 on comparison goods per year in Radlett. Total expenditure in Radlett by

[48] The adjustment uses a weighted average based on the proportion of online spending by each category and the proportion of that category which would be spent online. The weighted average equates to 41%. Therefore, 59% of household spending is assumed to occur in physical stores. Source: ONS, 2023. Retail Sales Index internet sales: table ISCPNSA3.

[49] Nexus Planning, 2018. South West Hertfordshire Retail and Leisure Study. Calculating leakage for Zone 4.

[50] Assumed to consist of the following expenditure categories: (i) food & non-alcoholic drinks and (ii) alcoholic drinks, tobacco & narcotics

[51] Assumed to consist of the following expenditure categories: (i) clothing & footwear; (ii) health; (iii) recreation & culture; (iv) education; and (v) miscellaneous goods & services.

[52] Nexus Planning, 2018. South West Hertfordshire Retail and Leisure Study

the additional households at the Proposed Development (195 homes) is therefore estimated to be **£198,583** per annum (£165,222 on convenience and £33,361 on comparison goods).

Improving the vitality of Radlett's local centre

5.24 The residents at the Proposed Development are expected to spend approximately **£198,583** on convenience and comparison goods in Radlett. For context, based on information provided in Appendix E of the South West Herefordshire Retail and Leisure study (CD4.16),[53] the total annual spend within Radlett's comparison and convenience stores in 2017 was estimated to be around £13.3m per annum (£7.6m convenience and £5.7m comparison goods).[54] The expenditure from the Proposed Development for retail is an increase of 1.5% of spending on the annual retail spend in Radlett in 2017 (the latest year for which data is publicly available). This rises to 1.8% of spend in Radlett if combining with the estimated worker expenditure locally set out in **paragraph 5.15**.

5.25 There is also likely to be a temporary increase in spending across the four-year construction period. The workers in the area are expected to spend approximately £964,560 across the four-year construction period (£241,140 on average per annum). This would provide a temporary injection of increased spending within the local businesses within Radlett whilst the Proposed Development is being built out.

5.26 Overall the Proposed Development's economic benefit to local businesses through increased spending from new residents takes into account local business needs to expand and grow, which satisfies the conditions for outlined in NPPF paragraph 81 (CD3.9), which states than planning decisions should create the conditions in which businesses can invest, expand and adapt.

Induced jobs

5.27 The annual physical expenditure of £3.2m per year from residents at the Proposed Development will result in induced jobs across Hertsmere, Hertfordshire and beyond. Induced jobs are estimated by taking the total spending (broken down by category of expenditure), and dividing by the GVA per FTE for Herefordshire for each sector relevant to that specific expenditure category. For example, residential expenditure on retail would be divided by the GVA per FTE in Hertfordshire's retail sector. Specifically, I use the total spending in each of the following sectors to estimate induced jobs: transport, recreation & culture, restaurants & hotels, and retail (including both convenience and comparison retail). I then find the GVA per FTE in Hertfordshire for these sectors. I divide the total spending by households at Proposed Development in each sector by the GVA per FTE of the corresponding sector to obtain the induced jobs estimate. Finally, I apply a medium displacement rate of 50% (from DLUHC guidance), to account for the fact that a proportion of these jobs would have been supported by other expenditure otherwise, in the absence of the Proposed Development.

5.28 A high additionality factor includes sites that have high 'clean up costs' which means the site would not come forward in the counterfactual, or in situations where there are no or very few other sites available in the local area, suggesting that applying a medium level of displacement is conservative in the context of both a national and local housing crisis. The latter is therefore considered to apply to the Proposed Development.

5.29 The total residential spending within Hertsmere is estimated to be 31%, with the majority taking place in South West Hertfordshire (91%), refer to **paragraph 5.20**. Based on this methodology, and applying the 91% leakage, the spending of households by residents at the Proposed Development is expected to induce 36 FTEs across Hertfordshire. Applying displacement and 31% to the overall residential spend estimates

[53] Nexus Planning, 2018. South West Hertfordshire Retail and Leisure Study

[54] Nexus Planning, 2018. South West Hertfordshire Retail and Leisure Study

that **12** net induced FTEs are generated from increased residential expenditure in Hertsmere by residents of the Proposed Development.

Net additional FTEs

5.30 The Homes and Communities (HCA) Additionality Guide (CD4.35) provides a framework that allows for the estimation of the net additional impacts of a development.[55] Three key factors determine the additional impacts and the justification for their values are provided in the following sections. I estimate net additional FTEs at a Hertsmere wide level.

Displacement

5.31 The proportion of jobs that would otherwise have been supported elsewhere. The HCA Additionality Guide (CD4.35) notes that "displacement arises where the intervention takes market share […] from existing local firms and organisations".[56] The proposal would generate direct jobs in the health care and education sector. Both sectors are currently constrained in employment. Therefore, I assume a low displacement rate of 25% for these workers, assuming that most of the positions created would not be taken from other areas in Hertsmere.

Multiplier

5.32 This reflects the indirect benefit to the other sectors supported by the Proposed Development, generated through both the supply chain and worker expenditure. The types of jobs coming forward within health care and education often have low supply chain impacts, as there are limited outputs from the workers which generate the need for large supply chains. The types of jobs provided are often paid below the median salary and as a result worker expenditure induced effects would also be expected to be low. Based on this I apply a low multiplier of 5% at the neighbourhood (local authority) level, equivalent to a factor of 1.05.

Induced residential expenditure FTEs

5.33 Refer to **paragraph 5.27,** where I estimate an additional 12 induced FTEs are created across Hertsmere induced by the increased residential spending of residents at the Proposed Development. Multipliers provided in the HCA Additionality Guide only rely on worker expenditure and supply chain purchases; induced FTEs created by residential expenditure are therefore considered to be additional to this.

Net additional impact

5.34 **Table 5.4** outlines steps taken and the estimate of net additional FTEs from the Proposed Development. This shows that across Hertsmere a total of **33** net additional FTEs in Hertsmere would be generated by the Proposed Development. This is equivalent to 0.1% of total FTEs in Hertsmere in 2021.[57]

Table 5.4 – the net additional impact of 33 FTEs generated by the Proposed Development is equivalent to 0.1% of total FTEs in Hertsmere in 2021

Impact	Method	FTEs - Hertsmere
Gross direct	A	**74**

[55] HCA, 2014. Additionality Guide: Fourth Edition

[56] HCA, 2014. Additionality Guide: Fourth Edition

[57] ONS, 2021. Business Register and Employment Survey

Impact	Method	FTEs - Hertsmere
Existing	B	**47**
Gross additional	C = A - B	**27**
Displacement	D	0.25
Net direct	E = C * (1 - D)	**20**
multiplier	F	**1.05**
Indirect and induced (worker expenditure + supply chain)	G = E * (F - 1)	1
Induced (residential expenditure)	H	12
Net additional	I = E + G + H	**33**
Hertsmere workforce 2021 (FTEs)		52,782
		0.1%

Source: HCA, 2014. Additionality Guide: Fourth Edition; Volterra Calculations

Social benefits

Health benefits

Affordable housing health benefit

5.35 Within this section, I further support the following statements within the Appellant's Affordable Housing Proof of Evidence (CD7.8, paragraphs 3.10, 3.11 and 3.16):

"In August 2019 the Children's Commissioner produced a report titled "Bleak Houses: Tackling the Crisis of Family Homelessness in England" (CD7.8) to investigate impact of homelessness and in particular the effect of this upon children."

"The report identified that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing and recent welfare reforms."

"Temporary accommodation also presents serious risks to children's health, wellbeing, and safety, particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues."

5.36 Presenting evidence such as this directly rebuts the Council's claim that "and the social benefits have not been evidenced to be meeting any particular deficiency" (refer to **paragraph 5.7**). With the social need for affordable housing clearly demonstrated, I take the analysis a step further by calculating the monetised benefit of health care cost savings from the delivery of affordable housing, in a time where the NHS is fiscally constrained.

5.37 In line with DLUHC's 2023 Appraisal Guide (CD4.17), the delivery of additional affordable housing units has the potential to result in a beneficial health impact, through fiscal cost savings.[58] This is a beneficial impact is associated with the private health and wellbeing benefits that occur when a resident previously living in an

[58] DLUHC, 2023. DLUHC appraisal guide

existing home that imposed an external cost on their health, moves into an affordable home, and the public cost savings (NHS savings) associated with this. Three key elements are considered in the average monetised value of the affordable housing health impact:

- [Paragraph G50 of the DLUHC Appraisal Guide] Estimating the probability of a new tenant that had previously been living in a poor condition or overcrowded property needs to be calculated. In addition, as there are large negative health impacts from rough sleeping, an additional house that is allocated to a rough sleeper can be expected to deliver relatively large health impacts;
- [Paragraph G55 and G56 of the DLUHC Appraisal Guide] The impact of poor housing on health, which is based on the Building Research Establishments (BRE) model which estimates the cost to the NHS associated with poor quality housing and the financial savings that can be achieved from removing overcrowding; and
- [Paragraph G57-G61 of the DLUHC Appraisal Guide] The impact of reducing homelessness and the probability that new affordable units reduce homelessness.

5.38 Based on the above assumptions, DLUHC estimate that the average value of external health impacts from affordable housing is equal to an annual value of £206 per unit (2022 prices), or £3,900 in present value terms over 30 years. This is applied to the residential yield of the 88 affordable homes and adjusting for 2023 prices, the affordable housing health benefit created by the Proposed Development is £18,690 per year from the 88 units at the Proposed Development (undiscounted).

5.39 The DLUHC guidance suggests that a 30-year appraisal period is appropriate to estimate the present value of this benefit (paragraph G64 in the guidance). Applying a discount factor (3.5%) and accounting for inflationary growth gives the total benefit over a 30-year period in net present value (NPV) terms. The total from the assumed opening year of the development (2028) equates to £433,800 (NPV). For context, this is equivalent to 0.3% of total health and social care GVA in Hertsmere in 2018.

Physical activity benefits

5.40 The patterns of physical activity established in childhood are perceived to be a key determinant of adult behaviour.[59] A growing number of children and young people are missing out on regular exercise, and an increasing number of children and young people are being diagnosed as obese.[60] Nearly one third of children are overweight or obese by the time they leave school.[61]

5.41 Access to play spaces, community or sport facilities such as sport pitches can encourage physical activity. There is a strong correlation between the quality of open space and the frequency of use for physical activity, social interaction or relaxation. The safeguarding of land, that includes the ability to provide new sports pitches, at Newberries Primary School would provide the opportunity to improve the outdoor sports available in Radlett.

[59] DfE, DCMS, and DHSC, 2019. School Sport and Activity Action Plan

[60] DHSC, 2017. Childhood obesity: a plan for Action Chapter 2

[61] DfE, DCMS, and DHSC, 2019. School Sport and Activity Action Plan

Summary table – permanent economic and social benefits

5.42 Here I present a summary of the quantitative permanent economic and social benefits of the Proposed Development:

Table 5.5 Summary of socio-economic benefits

Benefit	Impact
Additional employment	Gross additional – 27 FTEs (Radlett / on-site) Net additional – 33 FTEs (Hertsmere)
Additional worker expenditure	£35,522 each year
Additional GVA	£1,139,646 each year
Tax	Between £341,893 and £455,858 per year
Annual household expenditure	£198,583 annual total spending in Radlett local centre on convenience and comparison retail (an increase of 1.5% of Radlett 2017 retail spend) £1.05m in Hertsmere each year £2.9m in South West Hertfordshire each year
Affordable housing health cost saving benefit	£433,800 (NPV)

6. School expansion land benefits

6.1 In this final section I present evidence on the need for an expanded (1 Form of Entry [fe]) primary school at the Proposed Development. My analysis includes evidence on the existing and future population (and hence demand) for primary schools locally, the benefits of improved school facilities and the impact of the Proposed Development within the context of the overall housing need in Radlett over the coming years.

Existing population and provision

6.2 I have outlined the existing population of primary school residents and the provision of primary schools serving Radlett. Based on the latest Census data,[62] the existing population of primary school children in Radlett is given in the table below. Total population of primary school (aged 4 to 10) aged Radlett residents is 698.

Table 6.1 – there were 698 primary school aged residents in Radlett at the time of 2021 Census

Age	4	5	6	7	8	9	10	Total (4 – 10
Radlett	85	97	75	95	122	117	107	698

Source: ONS, 2021. Census 2021: Age by single year. Hertsmere 005 MSOA.

6.3 Radlett contains four schools serving primary age children. This includes two primary schools (ages 4 to 11), one infant school (ages+ 3 to 7), and one junior school (ages 7 to 11). **Table 6.2** shows the current stated capacity of these schools.

6.4 It is HBC's own judgment that Newberries primary school is the only school in Radlett identified to have the potential to expand (CD.4.21 see table 11 page 64).[63] They state that expansion is not possible on the school's existing site, however, it could expand into the adjacent development site (which forms part of the Proposed Development's boundary). It is likely that if you were to build additional classroom facilities on the existing site to accommodate an additional 1fe, the quality of the primary school would be diminished without the adjacent expansion land due to a lack of outdoor / play space provision. A bigger site with appropriate outdoor and play space would clearly be advantageous to the expanded primary school, particularly given that to my knowledge time spent outdoors forms part of the education curriculum for infant aged children.

6.5 The existing capacity of primary schools in Radlett is currently highly constrained (99.7%). The Department for Education (DfE) suggest that the capacity of schools should not exceed 95% (CD4.20).[64] Retaining a margin of unfilled spaces is necessary to operate the school admissions systems effectively. This operating margin is there to provide operational flexibility, rather than meet the need for additional school places

[62] ONS, 2021. Census 2021: Age by single year.

[63] HBC, 2018. Hertsmere IDP phase 1 Report

[64] Department for Education, 2013. Capital funding for new school places.

arising from proposed housing developments. Newberries Primary school is currently the only primary school in Radlett that is operating below the margin, being at an estimated 90% capacity.

Table 6.2 - Radlett data shows that there is currently constrained capacity at some schools

School	Type	Age group	Number of pupils	Total places	Capacity	2018 conclusions	Form of entry (fe)
Newberries Primary School	Primary	(4-11)	189	210	90%	No expansion potential within existing site, however, could expand into adjacent development site	1fe
St John's Church of England Infant and Nursery School	Infant	(3-7)	209 (estimated 30 nursery, 179 primary)	180	116%	No expansion potential	2fe
Fair Field Junior School	Junior	(7-11)	230	240	96%	No expansion potential, as feeder infant school cannot expand	2fe
Hertsmere Jewish Primary School	Primary	(3-11)	454 (estimated 65 nursery and 389 primary)	455	100%	No expansion potential	2fe
Total primary school pupil places			987 primary students (1,082 total)	1,085	99.7%		7fe

Source: HBC, 2018. Hertsmere IDP phase 1 Report (CD4.21); DfE, 2023. Get information about schools; Volterra Calculations.

Future need and impact of the Proposed Development

6.6 The Council's SoC (CD7.2, paragraph 4.30) argues that there is no current need for primary school expansion. They also state the expansion would not result in facilities to increase the number of children who could attend the school. However, information provided to me by the Appellant suggests that the proposal would allow for space for an increase of 1fe at Newberries Primary School. This would allow the school to be to accommodate more students, when it is required. My analysis presented here is based on that assumption, and as a result finds that when accounting for targeted future housing growth in Hertsmere, Radlett would in fact require the safeguarded land at Proposed Development to be provided to accommodate future primary school pupil demand.

6.7 **Table 6.3** shows Hertfordshire's school place planning forecasts for primary school places in Radlett.[65] This demonstrates a need for 143 primary school places in 2022/23, dropping to 132 by 2026/27. The forecast shows that Hertfordshire County Council expect there to be sufficient places available to meet the local pupil demand over the next five years. The following method has been used to calculate this:

- How many primary school pupils are moving on to secondary schools;
- Any trends which have formed over the past few years; and
- Any known housing developments expected to come forward.

6.8 Whilst this shows a declining demand for year R places (due to changes in demographic composition expected locally, where the proportion of primary age children in the population is expected to temporarily decline), it is clear that the forecasts do not account for any future housing growth. This is because no housing development that no housing developments are currently expected to come forward in the area, to the best of my knowledge. I therefore do not believe that this forecast adequately considers additional demand from future housing expected to come forward in the area.

6.9 Furthermore, whilst longer term population projections forecast the primary school age group in Hertsmere to continue to decline past 2026/27 until around 2036, but it is expected to return to above the 2026/27 level by 2043, according to ONS projections. For example, the ONS population projects forecast that there will be 6,400 5-9 year olds in Hertsmere in 2028, dropping to 6,060 by 2036, but then rising again to 6,230 in 2043. Therefore assessing the demand based on the next five years is sufficient to future proofing the expected primary school demand to the longer term.

Table 6.3 – Hertfordshire County Council forecast that Radlett has sufficient primary school places to meet demand for the next five years

Forecast	2022/23	2023/24	2024/25	2025/26	2026/27
Total pupil demand	143	134	135	133	132
Total places available	150	150	150	150	150

Source: Hertfordshire County Council, 2022. School planning: 2022 Primary School Area Forecast. Available at: https://www.hertfordshire.gov.uk/services/schools-and-education/at-school/school-planning/school-planning.aspx

6.10 The land being safeguarded for expansion at the primary school allows Newberries primary school to react to increasing demand through housing developments brought forward locally in the future, meaning that they have the option to expand once demand (through future housing development required in Radlett) builds to a high enough level such that it can no longer be accommodated within existing local capacity.

6.11 The future demand for primary school places within Radlett will depend on the number of homes that come forward within the area. My analysis above shows that between 581 and 898 homes are required in Radlett between 2022 and 2038 (refer to **Table 3.5**). I therefore believe that a more accurate way to estimate future primary school demand in Radlett would be to account for the demand created by this expected housing growth, of which the 195 homes provided at the Proposed Development are assumed to be included within.

6.12 My lower estimate is likely to be conservative in terms of the benefit of providing school expansion land as part of the Proposed Development. The reason for this is that in reality, future demand for primary school places in Radlett could be even higher, and hence the local area could be even more sensitive to primary

[65] Hertfordshire County Council, 2022. School planning: 2022 Primary School Area Forecast. Available at: https://www.hertfordshire.gov.uk/services/schools-and-education/at-school/school-planning/school-planning.aspx

school capacity constraints. Hertfordshire County Council's response to the Regulation 18 Local Plan (CD3.4) stated the following:

"I attach a quote by Children's Services (School Place Planning) in response to the draft local plan allocation of 940 dwellings in Radlett, stating that "Using the county council's tiered approach methodology, [the addition of 940 home in Radlett] this equates to an additional pupil yield of 2.5fe. The Radlett settlement strategy identifies the need to allocate land for a new, 2fe primary school within Site R1: Land north of Watford Road, Radlett, as well as land allocated within Site R3: Land south of Shenley Road, Radlett to facilitate a 1fe expansion of Newberries Primary School. The primary education provision offered in the plan for Radlett would meet the potential demand expected from the housing proposed."

6.13 It is clear that this calculated 2.5fe need from the 940 dwellings is greater than the need I estimate below using the housing requirement in Radlett of 581 to 898 homes. The reason for this is likely because the Council's education team utilise a bespoke demographic model that estimates the pupil yield from new housing developments within the boundary of Hertfordshire (see CD4.29 for reference). [66] It uses the demographic composition of residents moving into new homes, where it can be shown that families with younger children have a higher propensity to move home than their demographic representation across the population as a whole.

6.14 To my knowledge, access to the demographic model is not publicly available. However, the Hertfordshire County Council CIL Compliance Letter from Growth and Infrastructure Unit (CD4.30) states, that based on modelling the Proposed Development would yield approximately 13 reception year (year R) places. This is equivalent to a demand of 0.067 year R places per home. Applying this to the 581 and 898 homes required in Radlett over the local plan period, the total year R pupil yield would be between 39 and 60, which includes the 13 pupil places generated by the Proposed Development. I include the assessment of this yield as a higher scenario in **Table 3.4**.

6.15 For my lower scenario estimate on the future need for a primary school, I first estimate the number of year R places that are demanded by the existing 3,434 homes in Radlett (see **Table 3.4**), accounting for the fact that some primary school children attending local schools will reside outside of Radlett. I calculate this as follows:

- **Table 6.3** shows that Hertfordshire County Council estimate there is currently demand for 143 primary school (reception year [year R]) entry places in Radlett.
- The homes in Radlett contain approximately 698 primary school aged (4-10) residents based on 2021 Census data (see **Table 6.1**).[67]
- **Table 6.2** shows that there are 987 primary school students enrolled within Radlett schools, after removing what I estimate to be nursery age children.
- Therefore not all the demand for primary places in Radlett is coming from the 3,434 homes within Radlett itself.
- I account for this by first dividing the demand for 143 places by the 987 enrolled primary school students. This finds that the year R places are demanded in Radlett as 0.145 places per current primary aged child enrolled in the identified local primary schools.
- Applying this factor to the total number of primary school students in Radlett (698) gives the demand of 101.13 places from the 3,434 homes in Radlett. This equates to a demand of 0.029 year R places per Radlett home.

6.16 This demand per home can then be applied to the expected housing growth in Radlett over the draft New Local Plan period (2022 to 2038) to estimate the long term increase in primary school demand locally. My analysis shows that between 581 and 898 homes are required in Radlett over this period (refer to **Table 3.5**). The estimated increase in primary school places, compared to future capacity, is outlined in **Table 6.4**.

[66] HCC, 2021. Pupil Yield Methodology

[67] ONS, 2021. Census 2021: Age by single year.

The table shows that based on both future housing growth allocated to Radlett under either the current Core Strategy (CD3.1) or the withdrawn Regulation 18 Local Plan (CD3.4) proportions, current primary school capacity in Radlett will not be sufficient to accommodate future demand.

6.17 When adding the 1fe expansion as a result of the Proposed Development, however, capacity in Radlett will expand and future-proof the local area against any future shortfalls in primary school provision through planned total future housing growth. The capacity under the total future housing growth scenarios are forecast to be at between 83% and 88% of capacity, below the DfE benchmark of 95%. Without this extra capacity provided at Newberries, there would be constraints on primary school provision locally (greater than 95% capacity) as a result of future housing growth in Radlett.

6.18 For the higher scenario, my estimate uses the Hertfordshire County Council CIL Compliance Letter from Growth and Infrastructure Unit (CD4.30) pupil yield of 0.067 year R places per home. This shows that there would be a shortfall against current capacity for all the presented housing growth scenarios. When adding 1fe at Newberries Primary School, the capacity under the total future housing growth scenarios improves from between 114% (581 homes) and 128% (898 homes) to 95% and 107% when compared to the current capacity. Whilst the 898 homes scenario is above the DfE benchmark of 95%, my analysis shows that under a high pupil yield forecast, the 1fe increase could feasibly support pupil demand for 581 homes within Radlett until further provision of primary education was brought forward.

6.19 Here, I have clearly and transparently calculated the demand based on the increase of year R places. It should be noted, however, that over the longer term the 1fe increase at the Newberries primary schools would increase capacity across all year groups at the school. Therefore over time the school would be able to accommodate additional 5 to 10 age group residents arriving in the area as a result of the new housing growth. It is expected that by the opening year of the Proposed Development, there will be some spare capacity in local primary schools for older primary children (5-10) arriving in the new area who wish to switch to a local school (this is expected to be relatively low). The future extra capacity provided at Newberries will also allow greater flexibility around potential bulge years that might occur locally.

6.20 In both scenarios I have demonstrated how the benefit of the school's expansion would future proof Radlett for primary school provision. It is for this reason – the ability of the expansion land to allow for accommodation of new demand from not just the Proposed Development but also other future housing growth in Radlett, that I judge the provision of this expansion land to be an additional benefit rather than simply just a mitigation measure for the Proposed Development's impact.

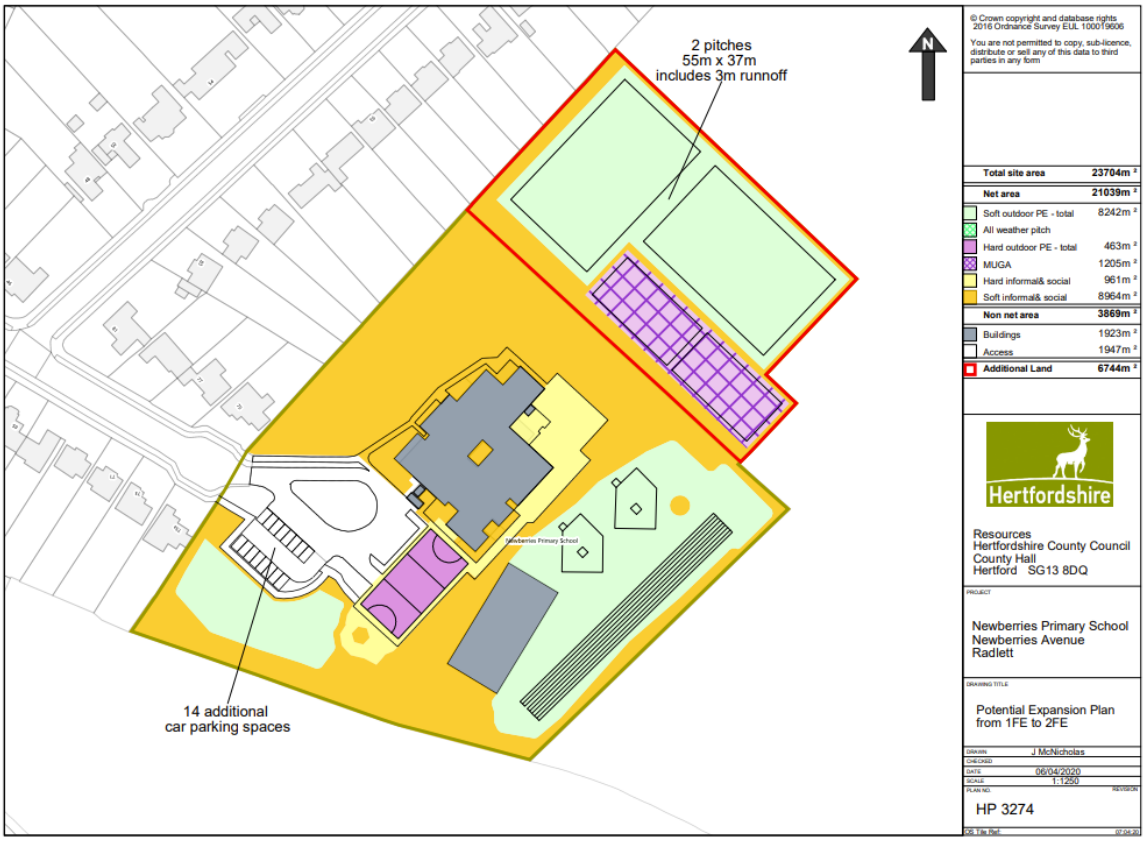
6.21 Finally, another complexity outlined within the Hertfordshire County Council CIL Compliance Letter from Growth and Infrastructure Unit (CD4.30) is that the majority of primary school places in Radlett are at faith schools. There is large demand for faith places, but there is need for new places at mainstream schools: *"A reserve school expansion site is therefore a necessary and appropriate obligation for this application for HCC*" (CD4.30). This statement further supports my evidence for the need of the primary school expansion and the Proposed Development.

Table 6.4 - Expected growth and impact on capacity in primary school entry places demand with housing growth in Radlett – year R

Scenario	Primary school children joining	2026/27 no housing growth	Updated forecast demand (with housing growth to 2028)	Current Capacity	Shortfall / surplus against current capacity	Future capacity with Proposed Development adding 1fe	Shortfall / surplus against current capacity
Lower scenario (using my pupil yield estimate)	Proposed Development (195 homes)	132	138	150	12 (92%)	180	42 (77%)
	Total future housing growth – current local plan allocation (581 homes)	132	149	150	1 (99%)	180	31 (83%)
	Total future housing growth – draft New Local Plan allocation (898 homes)	132	158	150	-8 (106%)	180	22 (88%)
High scenario (using HCC Growth and Infrastructure Unit pupil yield	Proposed Development (195 homes)	132	145	150	15 (97%)	180	35 (81%)
	Total future housing growth – current local plan allocation (581 homes)	132	171	150	-21 (114%)	180	9.3 (95%)
	Total future housing growth – draft New Local Plan allocation (898 homes)	132	192	150	-42 (128%)	180	-12 (107%)

Source: Volterra calculations, 2023.

Figure 6.1 – potential expansion from 1fe to 2fe at Newberries Primary School



Contact Us

volterra.co.uk

lthurley@volterra.co.uk

Chester House
1-3 Brixton Road
London
SW9 6DE