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A Guide to Certificates of Appropriate Alternative Development

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Planning Assumptions: Principles and Practice

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What are the planning assumptions?

- **Trocette Property v GLC (1974) 28 P&CR 408:**
“no assumption of any kind should be made unless provided for by statute or decided cases”
- **S.14 LCA 1961:** describes assumptions re planning permission “comprehensively” (Curzon Park at [59])



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Section 14

1. **Take account of actual pp** (but if incapable of implementation, may not add value:
Manchester Land Sec v Denton UDC (1970) 21 P&CR 430)
 - **On the relevant land**
 - **On other land**



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2. Take account of prospect of pp being granted

- On the valuation date (s.5A)
- After the valuation date
- On subs.5 assumptions



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3. Assume pp is in force, or will be granted at later date, for any appropriate alternative development

- AAD =
 - On subs.5 assumptions
 - Otherwise in circs known to market at val date
 - Pp could 'reasonably have been expected' to be granted on that date / later date
- → S.17 certification



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Planning policy

- **As at valuation date** (subject to subs.5)
- **Apply s.38(6) PCPA 04:** determine in accordance with DP, unless mat cons indicate otherwise: *Tescan v Cornwall Council* [2014] UKUT 0408 (“*apply ordinary planning principles*”)
- **Adopted / emerging DP**
- **National / other local policy**
- **Other mat cons**



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- **Cancellation assumption:** scheme underlying acquisition cancelled on **launch date** (= publication of notice of CPO / other order / re private bill)
- **Disregard policy which has no function beyond the scheme:** *Boland v Bridgend BC* [2017] EWCA Civ 1004 (but nb pre LA 2011 amendments)
- **Policy of general and scheme specific application?**



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- **Policy evolution post-launch date?**
 - Planning assumptions assessed at valuation date
 - “Events which would have occurred [between launch and valuation date] are a matter of speculation and provide no basis for an assessment of compensation”: Curzon Park
 - Can leave lacuna in policy framework?

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Further issues

- **The reasonable LPA:** *Essex Showground* [2006] RVR 336
- **Balance of probabilities:** *Porter* [1996] All ER 693
 - But if CAAD obtained, it may be assumed pp is in force, or it is certain that pp will be granted (s.14)
 - Likelihood → certainty?
- **Prospect of pp that is not AAD:** s.14(2)(b)

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A Review of Recent Tribunal Decisions

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***Lockwood & Ors v Highways England* [2019] UKUT 104**

- 0.67 ha site on indicative route of Lower Thames Crossing project
- UT had “*no doubt*” that CAAD appeal motivated by desire to avoid affordable housing contribution
- Desired avoidance was unsuccessful due to revised NPPF and PPG
- CAAD appeal allowed and certificate varied to 9 units rather than ‘not fewer than 11 and not more than 12’

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***Lockwood & Ors v Highways England* [2019] UKUT 104**

The Valuation Date

- Blight Notices served. Accepted by AA with consequential deemed service of NTT (s. 154 TCPA 1990) and ability of A to apply for CAAD (s. 22(2)(b) LCA 1961)
- UT must consider whether development is AAD by reference to the “relevant valuation date” (s. 14)
- S. 5A(3) LCA 1961 – VD is the earlier of the date when entry and possession taken or the date when the s. 5 rule (2) valuation of the land is made

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***Lockwood & Ors v Highways England* [2019] UKUT 104**

The Valuation Date

“...the appellant must be taken to be willing to have the terms of the CAAD determined on the basis of policy at the date of determination. That is the closest date to the date of entry for which a policy framework can reliably be identified and without speculating about future policy changes. One way of looking at it might be to say that, by bringing the appeal when they have, the appellants have waived the right to rely on any relevant changes of policy which might occur before the date of entry or assessment.” [47]

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***Reeves v SoS for Transport, Bolsover DC* [2019] UKUT 213**

- Former plant nursery within HS2 Phase 2B safeguarded corridor
- Negative certificate issued where A had applied for 24 residential units
- Appeal allowed and CAAD granted for exploitation of sources of renewable energy and small scale employment uses related to local farming, forestry recreation, or tourism

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Reeves v SoS for Transport, Bolsover DC [2019] UKUT 213

- Reiterates **Lockwood** - *"I am left, as the Tribunal was in Lockwood, to do the best I can on the material available at the date of my determination"* [22]
- Getting the Right Respondent – the AA is not always the LPA
- Where LPA wishes to defend its view and there is a good reason for it to do so, UT likely to allow request for LPA to be added as additional R

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Pro Investments v Hounslow BC [2019] UKUT 319 (LC)

- Site of 1980s Office Building required for Enabling Development for Brentford Football Stadium
- Acceptability of 300+ units (8/9 to 15/16 storeys) v. fewer than 100 units (4/5 to 8/9 storeys)
- Main Issues:
 - Height, Scale and Massing of Development in context of degree of harm to heritage assets;
 - Impact on Townscape Character; and
 - Amount of employment space required

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Pro Investments v Hounslow BC [2019] UKUT 319 (LC)

A Cautionary Tale about Witnesses

“96. Regrettably, by this stage of Mr Doran’s evidence we felt unable to place any confidence in his judgment. His original written evidence was so far from the view he had expressed when advising on the impact of the stadium scheme that we were driven to the conclusion that his capacity to arrive at an objective assessment was compromised by the outcome favoured by his employer, the respondent...”

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SoS for Transport v Curzon Park Ltd & Ors [2020] UKUT 37

- Conjoined Preliminary Issue Hearing in respect of 4 HS2 appeals for sites at Curzon St station
- In each case, CAAD sought for substantial mixed-use scheme including purpose-built student accommodation
- When determining each of the four applications, Council accepted Rs' submissions that it should disregard other CAAD applications
- SoS contended for cumulative approach on basis that, in the “*real world*”, the “*jackpot*” would be shared out

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SoS for Transport v Curzon Park Ltd & Ors [2020] UKUT 37



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SoS for Transport v Curzon Park Ltd & Ors [2020] UKUT 37

- SoS: DM may treat other CAAD proposals as notional planning applications on other land on the cancellation assumption (s. 14(5))
- Rs: (i) Applying s. 14(5) assumptions and also taking into account CAADs, which only operate and have effect in scheme world, would be perverse
(ii) CAADs are not planning considers under Planning Acts, not material planning considers and have no role to play in determination of planning applications

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SoS for Transport v Curzon Park Ltd & Ors [2020] UKUT 37 Judgment

- Assumptions under s. 14(5) do not require DM to assume that CAAD applications have not been made on adjoining sites [44]-[46]
- Successful CAAD application on adjoining land does not need to be disregarded for all purposes in determination of an application for CAAD [50] **but...**
- CAADs are not notional applications for, or grants of, planning permission, nor are they material planning considerations [66]

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SoS for Transport v Curzon Park Ltd & Ors [2020] UKUT 37

Problems with SoS approach

- (i) Starts with a preconceived notion of what fairness requires rather than starting with statutory provisions [58]
- (ii) UT could find "no trace" of assumption that CAADs are notional planning applications in statutory language [59]-[61]
- (iii) Could lead to unpredictable, capricious and arbitrary outcomes [62]
- (iv) On fairness, one cannot know which R would have done well and which badly, because none was allowed the opportunity [64]

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CAAD: Practical hints and tips at the application stage

Rebecca Clutten

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Practical hints and tips at the application stage

- Decision to apply for a CAAD is an important strategic one
- Can have a significant impact on costs, timescales for receipt of compensation, and outcomes
- Session provides hints and tips for those:
 - applying for (or considering applying for) CAAD; and
 - for those responsible for determining them

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5 Steps for success

1. Determining if applying for a CAAD is the right decision
2. Considering what the CAAD must establish
3. Using the correct policy and factual matrix
4. Understanding what is required of an application
5. Using existing planning tools

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1. Is applying for a CAAD the right decision?

- Purpose is to establish conclusively what is AAD for the purposes of s.14
- It is not the only means of doing so – can be determined by the Tribunal: s.14(3) LCA 1961
- BUT once the certificate route is used, certificate becomes conclusive as to AAD (subject to appeal): ss.17(6) and (7) LCA 1961



1. Is applying for a CAAD the right decision?

Potentially more appropriate	Potentially less appropriate
Simple forms of development	Complex forms of development
Low levels of supporting documentation in real world, e.g. DAS only	High levels of supporting documentation in real world, e.g. large or complex EIA
LPA would expect limited objection	LPA would anticipate higher levels of objection
Expectation that LPA is likely to grant	Expectation that particular LPA is likely to refuse (but that a notional LPA would not)
Limited prospect of appeal by Acquiring Authority	High likelihood of appeal by Acquiring Authority
Obtaining CAAD likely to lead to resolution of compensation claim	Obtaining CAAD unlikely to lead to resolution of compensation claim
Straightforward planning policy matrix	Planning policy arguments likely to be complex as a result of application of cancellation and other planning assumptions



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2. What do you need the CAAD to establish?

- Purpose of establishing CAAD is establish value
- Essential that certificate is sufficiently specific to enable surveyor to value development for which CAAD sought
- Particularly important if valuation is to be undertaken on residual basis
- Vague certificate has potential to hinder rather than help
 - E.g. Grampian condition might lead to doubts as to whether PP could have been implemented

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2. What do you need the CAAD to establish?

- How to resolve this?
 - Make your application valuation-led: invite your valuer to provide a 'shopping list' of matters key to valuation and seek to lock down in certificate
 - E.g. floorspace by uses, storeys/building height, dwellings, proportion of affordable housing, phasing

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2. What do you need the CAAD to establish?

- How to resolve this?
 - **Do not** underestimate the significance of conditions and S106 heads of terms
 - Minimize number and maximise ability to value/comply
 - Discuss with the LPA wherever possible
 - Example: Student Housing Nominations Agreement condition

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3. Using the correct policy and factual matrix

- Detailed planning assumptions not for this talk
- Importance of proceeding on correct policy and factual basis cannot be overstated
 - Stay as close to reality as assumptions allow
 - If dealing with draft policies or other non-adopted guidance, make sure they had been published at VD (e.g. housing land supply requirements)
 - If controversy is to be expected, consider approaching on alternative basis (if result would be the same)

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4. Understanding what is required of an application

- MHCLG CPO Guidance at [271]:

“An application under section 17 is not a planning application and applicants do not need to provide the kind of detailed information which would normally be submitted with a planning application. However, it is in applicants’ interests to give as specific a description of development as possible in the circumstances, in order to ensure that any certificate granted is of practical assistance in the valuation exercise”.

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4. Understanding what is required of an application

- Upper Tribunal in PRO Investments at [117]:

“We agree that a CAAD does not require the same degree of detail as an application for a full planning permission, but it is for the claimant to establish that the scheme which it proposes would be likely to receive permission. If the proposed scheme contravenes normal design standards it is for the claimant to demonstrate that it would nevertheless be likely to obtain permission. It may readily be assumed that certain design issues would be capable of satisfactory resolution including, for example, issues concerning materials and aesthetic features. But where design standards impose real constraints on the scale of development which is likely to be permissible, the Tribunal has to be satisfied on the balance of probability that the claimant’s proposal would not be rejected because it fell short of those standards”.

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4. Understanding what is required of an application

- Considerations when determining what to supply or request:
 - How vital is it to determining acceptability of proposed development?
 - Would its preparation be reasonable and proportionate?
 - Does it fall within the category of things that it can reasonably be assumed could be addressed acceptably?

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4. Understanding what is required of an application

- Considerations when determining what to supply or request:
 - Would its preparation ultimately assist the valuation exercise?
 - Could agreement be reached about the need for it to be prepared? (Involving applicant/LPA/AA)

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5. Making use of existing planning tools

- Pre-application advice
 - Can be used to road-test proposals
 - Understand LPA's likely requirements for the application
 - Identify any in-principle objections
 - Inform decision as to whether to seek CAAD to apply
 - Reasonable costs should be recoverable

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5. Making use of existing planning tools

- Can be challenging for LPAs to prioritise planning for developments that will never be built **but** CAADs of substantial importance to applicants/Acquiring Authorities
- Can lead to a mismatch in expectations/tension
- Potential solution – use of planning performance agreements

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5. Making use of existing planning tools

- Voluntary agreement between LPA and applicant (and third parties, where appropriate) that enable parties to agree the timescales, actions and resources necessary to process the CAAD application
- Voluntary payments can be made to accommodate the abnormal costs associated with CAAD applications
- Reasonable costs should be recoverable, if it was an appropriate action in the circumstances

Remember: these may result in disclosable outputs

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Practical Tips for Going to the Tribunal on a CAAD case

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The Basics

- The Question:
 - What would a reasonable planning authority have done?
- The Process:
 - Formal Tribunal process, NOT like a planning inquiry
 - Much stricter approach to evidence and advocacy

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Tip 1: Target the Evidence at the Question

- Go back to the question that the Tribunal has to answer
- Not simply a matter of expert judgment but evidential proof
- Often many years in the past

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Tip 2: Build the Context

- An actual LPA knows the context
- Tribunal has to create it
- Opportunities and risks associated with this

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Tip 3: Educate the Tribunal

- Tribunal not an expert planning Tribunal
- Don't assume familiarity with jargon
- Don't assume familiarity with planning practice or culture, needs to be explained where relevant

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Tip 4: Co-operate and Collaborate

- Tribunal very firm on co-operation
- Isolate the nub of expert disputes
- Co-operation over process too

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Tip 5: Map the Full Scope of Case

- Other AAD?
- Competing uses that might defeat claimed AAD
- Proof = certificate; uncertainty = hope value



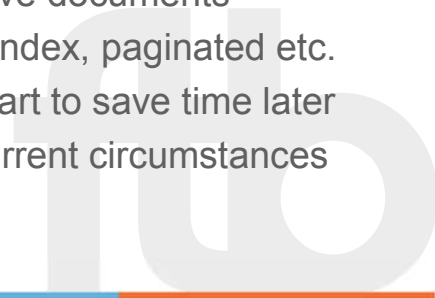
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Tip 6: Be Discerning with the Quantity of the Evidence

- No “inquiry library”
- Little tolerance for excessive documents
- Identify the actual pages, index, paginated etc.
- Invest time in this at the start to save time later
- Even more important in current circumstances



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Tip 7: Get the Statutory Assumptions Clear

- Lawyers' role to support experts
- "I am advised that...."
- Critical that framework for expert evidence is correct



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Tip 8: Look Past the RVD

- CAAD at a future date is part of regime
- Appellants: use momentum of case
- Respondents: use uncertainty



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Tip 9: Be Absolutely Scrupulous with Expert Obligations

- Expert obligations are taken seriously
- Credibility is generally a theme in XX
- Beware employed experts with “skin in the game”



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Tip 10: Test your Experts

- Follows from Tip 9
- Not a planning inquiry
- Not a place to “have a go”



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