

North Hertfordshire Local Plan Examination

Hearing Statement of Croudace Homes Group

Matter 6: Deliverability

This statement follows on from the representations submitted to the Council under the following references:

- Respondent 14468: Croudace Homes Ltd (submitted by Portchester Planning)
- Respondent 16069: Croudace Homes (submitted by Savills)
- Respondent 193: Croudace Strategic Ltd (submitted directly by Croudace)

All these submissions are from parts of the Croudace Homes Group, which will be termed “Croudace” in this statement for simplicity.

Matter 6 – Deliverability (the housing trajectory, infrastructure and viability)

1. In terms of deliverability, Croudace make no comment on sites other than the three sites we are promoting, which are: AS1 at Ashwell, GA1 at Great Ashby, and NS1 at North Stevenage. Comments on the specific merits of these sites were submitted by Croudace to the Proposed Submission consultation. More detailed comments to the site and settlement-specific questions raised under matters 10 and 11 will be submitted at the appropriate time. Therefore these comments under matter 6 only address the questions of deliverability.

Issue 6.1

2. With regard to the latest version of the housing trajectory, as included in the Housing and Green Belt Background Paper partial update of September 2017 (ED3), Croudace is keen to work towards the early delivery of the three sites we are promoting.
3. In respect of **AS1**, this non-green belt site is controlled by Croudace, and the Council has been considering an application here since July 2016 (reference 16/01797/1). We confirm that the assumed timings seem reasonable. It should be noted that the number of dwellings proposed on this site has been reduced from 33 to 30 as part of the development management process in negotiating that application.
4. For site **GA1**, the Council's dwelling estimate needs to be increased. An application was submitted in July 2016 for 360 dwellings (reference 16/01713/1). The Council's development management team have raised no technical or policy issue with the number of dwellings proposed on the site under this application. We therefore request that the dwelling yield of this site should be increased from 330 to 360 dwellings.
5. The Council's assumed delivery rate seems quite high for a site of this size. We believe a more plausible trajectory for this site would be for delivery of approximately 60 dwellings per year. If permission is granted around mid-2018, infrastructure works could begin later in 2018 and dwellings early in 2019, allowing for completions of around 60 dwellings per year for each monitoring year from 2019/20 to 2024/25.
6. We believe this site is one of the most advanced large sites in the district, and strongly urge the Council to move swiftly towards determining the application.
7. Site **NS1** is shown in the trajectory as seeing the first housing completions in the monitoring year 2023/24 and reaching a rate of 125 dwellings per year. As a site of this size, multiple build and sales outlets may be possible, allowing for higher completion rates, although there will still be a 'market ceiling' in terms of how fast the homes can be built and how quickly the market can buy them.
8. Our main concern with NS1 is that the time lag between the site being allocated and completions beginning seems unduly pessimistic. Assuming the Local Plan is adopted around mid-2018, we would hope to submit a planning application during 2019. We would suggest that 2021/22 seems a more likely time to expect the first dwelling completions here, rather than the 2023/4 that the Council has proposed.
9. We suspect the Council has delayed the delivery of this site in its trajectory so that it is not counted within the five-year supply figures. We can understand the Council's desire to err on

the side of caution on this front, in the event that they have to consider applications based on criticism of their five year supply position. That said, we would want to be reassured that the Council will ensure that expeditious progress is made on NS1 so that delivery can begin as soon as possible, to maximise the chances that the whole 900 dwellings will be completed within the plan period.

10. We would like to be reassured that the delay is not because the Council is assuming that there will be a need for several years of work in producing masterplans or similar for the site before work can start. We acknowledge that some masterplanning will be necessary for a site of this size, but the process must be kept focussed and swift in order to ensure the necessary dwellings can be delivered as expeditiously as possible.

Requested changes

- Change number of dwellings on AS1 from 33 to 30;
- Change number of dwellings on GA1 from 330 to 360; and
- Reconsider phasing of sites illustrated in housing trajectory, particularly encouraging swift determination of applications on large allocated sites.

Issue 6.2

11. The Infrastructure Delivery Schedule contained in Appendix 1 of the Infrastructure Delivery Plan (TI1) appears to contain the key areas of infrastructure that we believe will prove necessary in order to support delivery of the sites Croudace is promoting. There may be other more localised requirements such as highways works associated with particular sites, but these will be at a level such that they will be delivered through mechanisms such as Section 278 agreements associated with the developments rather than requiring external funding.

Issue 6.3

12. Croudace has two particular reservations on the implications of the policy requirements on the deliverability of the sites, relating to the uncertain position over the potential requirement for employment land on strategic sites, and self-build housing. Both these issues will be more directly addressed under other matters, notably matters 8 and 11.
13. For the purposes of this matter, we would highlight that Policy SP3(d) appears to create an expectation that there will be some employment land provided on the strategic housing sites. On NS1, whilst we are happy to provide an appropriate level of facilities as part of a neighbourhood centre, we do not see that there is sufficient land to have any significant amount of employment land as well as the 900 homes the Council proposes.
14. Moreover, the valuation exercise contained in Appendix IV of the Local Plan Viability Study (TI2), does not appear to include any element of employment in either the costs of developing the site or in the revenues which the site is likely to generate. It therefore seems that the Council has an aspiration to include employment land on these sites arising from Policy SP3(d), yet has not quantified how much employment land it is looking for, has not assessed whether there is any spare capacity on the strategic sites for employment land in addition to the residential development and supporting infrastructure already assumed, nor has the plan assessed the viability implications of this policy.
15. The other aspect where we do not see that the evidence supports the policy approach taken is on self-build housing. Whilst the 9 serviced plots sought by Policy SP16(e) is a relatively

modest proportion of the development as a whole, they will nevertheless have a disproportionate impact on the delivery of the site.

16. For health and safety reasons it is impractical to have self-builders working alongside our own build teams; to keep the site safe we need to have full control of the area being developed. We would therefore not be happy in releasing such plots until after all the surrounding area was complete.
17. We do not see that people interested in self-building would be interested in building terraced or semi-detached properties, for the additional complexity that places on them. Therefore we think the effect of this policy would be to require us to set aside nine plots suitable for detached homes. On a development of this type, only a minority of the homes would be expected to be detached, and therefore nine plots becomes a much more significant proportion. The Local Plan Viability Study (T12) does not specify how many of its assumed housing mix are detached, but it does assume that there will only be 54 four bedroom properties on site NS1, which is probably a reasonable proxy for the number of detached properties (there will likely be small numbers of 3 bed detached properties and 4 bed non-detached properties, but these are likely to counterbalance each other). Nine out of 54 detached dwellings is a much more significant proportion.
18. Detached plots take up most space but can be the ones which generate most revenue, and are good for the marketing of the site as a whole. Moreover, we do not believe it was the Government's intention in trying to make it easier for self-builders simply to reserve a proportion of sites which are already going to be developed. We believe the aim was to use self-build as a way of bringing forward additional plots which would not otherwise have been developed. We suspect most self-builders would rather that a more permissive approach was taken to small plots within or adjoining existing settlements, rather than setting aside plots on a new-build estate.

Requested changes

- Either delete criterion SP3(d) entirely, or make it clearer that the level of employment land being sought on strategic sites is small-scale and likely to be associated solely with any new neighbourhood centres.
- Delete criterion (e) from policy SP16.