

## **North Hertfordshire Local Plan Examination**

### ***Hearing Statement of Croudace Homes Group***

#### ***Matter 8: Housing Strategy***

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 8 – The housing strategy: affordable housing (Policies SP8 and HS2), housing mix (Policy HS3) and supported, sheltered and older persons housing (Policies SP8, HS4 and HS6)**

### *Issue 8.5*

1. Croudace is concerned by the way in which Policy HS2 is structured and phrased. The table of thresholds and targets is relegated to the end of the policy and is not directly addressed by the policy wording. Instead, the policy wording talks about affordable housing provision being “maximised having regard to the targets set in this policy”.
2. This wording is unclear. Croudace is generally happy to provide policy-compliant levels of affordable housing on the sites it is promoting in North Hertfordshire, but it needs to be very clear what that level of affordable housing is. Use of the term ‘maximised’ introduces the possibility that even meeting the targets may not be sufficient. Depending on how this wording is interpreted, it could be the case that viability evidence may have to be prepared for even schemes which meet the targets, so as to demonstrate that no more affordable housing could be provided.
3. We do not believe it is reasonable to have such an open-ended policy as this. It is important for developers and landowners to have clarity on the policy requirements, especially when bidding on sites. Lack of clarity makes it more likely that sites will be secured by promoters who can make the most convincing case to the landowner that they will be able to work round the loosely-worded policy. We do not believe such an outcome is in the interests of the proper planning of North Hertfordshire.
4. We suspect the council’s intention was that viability testing would be required for developments which propose less than the target set in the policy, but the way the policy is worded is not limited to this scenario and may therefore potentially have unintended consequences.
5. We believe that the way the policy is presented is therefore unclear and therefore not effective.

### *Requested changes*

- The table at the end of the policy should be explicitly linked to the policy wording.
- Policy HS2(a)(i) should be reworded to remove the phraseology about maximising provision – perhaps replace “maximised having regard to the targets...” with “secured in accordance with the targets...”

### *Issue 8.7*

6. The evidence for the self-build requirement lacks robustness. As discussed in our Matter 6 statement, providing self-build plots on part of a larger site has knock-on effects out of proportion to the small number of plots sought. We are concerned that the policy is supported by very little evidence.
7. In particular, we believe the evidence base which justifies the self-build requirement on the strategic sites is contained in Part 2 of the Strategic Housing Market Assessment (HOU5), but

this evidence is not conclusive on what the level of demand for such plots may be, nor does it (or the Local Plan Viability Study T12) properly assess what the effect of the policy may be.

8. Paragraph 4.30 of HOU5 notes that there was no registered interest in self-build plots in Stevenage. It is therefore questionable as to whether Stevenage (which we would assume would also apply urban extensions to the town into North Hertfordshire) has the demand there to justify this policy, particularly for site NS1.
9. Paragraph 4.32 of HOU5 concludes that 1% self-build on urban extensions “is a reasonable response based on the limited evidence that is available.” However, this conclusion has not been properly tested in the Local Plan Viability Study (T12). Paragraph 2.2.15 of that study side-steps the issue. It acknowledges that experience in this field is limited, but assumes that “...the provision of plots for custom-build has the potential to be a sufficiently profitable activity so as not to prove a significant drag on overall site viability”.
10. We do not have sufficient evidence to say whether the sale of serviced plots to self-builders would be profitable or not. Our concern however, is wider than the risk of making less money on the sale of self-build plots. Of more concern to us is the fact that these plots by their nature will claim a disproportionate number of the detached plots on a site, and will lead to considerable difficulties in providing a safe and managed working environment for the construction of the wider development, as also discussed in our Matter 6 statement.
11. We therefore do not see that the policy on self-build plots as included in Policy SP16(e) is based on robust evidence showing why it is necessary, nor have the impacts of the policy been properly assessed for their impact on the wider scheme.

*Requested change*

- Delete criterion (e) from Policy SP16.

**Issue 8.11**

12. We do not see the evidence justification for criterion (a) of policy HS5. Accessible and adaptable housing is a laudable aspiration, but a requirement for 50% of the plots on large sites to be able to meet the M4(2) standard does not appear to be supported by the evidence.
13. In particular, paragraph 3.2.10 of the Local Plan Viability Study (T12) shows that the viability consultants based their main appraisals on 10% of plots meeting the M4(2) standard. It also shows that having considered various iterations of higher proportions meeting this standard, including options at and higher than 50%, the viability consultants concluded that “a policy encouraging 20% of new dwellings to meet Part M(2) would not make an otherwise viable site unviable.”
14. We therefore do not see how the Council has justified the 50% contained in Policy HS5(a), and therefore believe that it is unsound as not being justified by the evidence.

*Requested changes*

- Policy HS5 (a) should reduce the proportion of accessible and adaptable dwellings sought down to the 20% recommended by the viability study.