

WRITTEN STATEMENT ON BEHALF CREST NICHOLSON
Stage 2 Hearing Sessions – Week 2, Hearing Day 5 (15 October 2025)
Regulation 19 Submission Number: 266

Inspector's Matter 4 – Type and Mix of Housing

Issue 1 – Housing Mix and Density

Q1 Is Policy HOU1 justified by appropriate, available evidence?

- 1.1 The mix of dwelling sizes by tenure is based on the Local Housing Needs Assessment (2024: 'LHNA'). As the latest published evidence of need by the Council, this is appropriate as a starting point for assessing dwelling mix.

Q2 Is the Plan sufficiently flexible enough to adapt to changing circumstances and needs over the plan period?

- 1.2 As set out in our Regulation 19 representations (see paragraph 6.2 to 6.4), a degree of flexibility has been included between the Regulation 18 and 19 versions of this Policy in relation to Broad Locations. However, further flexibility is required to account for changing circumstances over the Plan period.
- 1.3 The dwelling mix by tenure set out at Table 4.1 of Policy HOU1 represents housing need at a specific point in time. This has changed significantly since the previous Strategic Housing Market Assessment (2016: 'SHMA') which provided a single target for affordable homes and did not split this out between affordable rent and affordable home ownership. Additionally, the latest figures identify significantly greater needs across all tenures for larger homes. The most notable increase being affordable rented three-bedroom homes which have increased from 25% in the 2016 SHMA to 45% in the 2024 LHNA.
- 1.4 This evidences the extent of change that can occur in a c. eight-year period. The Plan period will be double this and it is reasonable to assume that needs for homes of different sizes will continue to evolve over that timeframe. Part b) of Policy HOU1 should be amended to require 'broad accordance' with the mix at Table 4.1 rather than prescribe exact accordance as currently drafted. Alternatively, or additionally, the Policy could be further amended to refer to the mix at Table 4.1 or such other mix as may be agreed based on the latest available evidence of need.
- 1.5 Added to this are our concerns regarding fixing the final purchase price of shared ownership and discount market sales homes as the midpoint of the range in the LHNA (HOU2 part i)). It is unreasonable to apply this figure across the Plan period. As suggested above, this should relate to latest evidence. Or as per our Regulation 19 representations (paragraph 6.8), amended to no less than 20% below market value to reflect the market at the time of the development.

Q3 *How is it intended that Policy HOU1 interacts with criterion b) of Policy HOU2 in terms of dwelling size?*

1.6 Whilst we have no objection to criterion b), it does duplicate Policy HOU1.

1.7 The same points as set out to Issue 1, Q2 apply in respect of this reflecting a need for homes of a specific size/ tenure based on evidence from 2024. The need for affordable rented three-bedroom homes has seen the greatest change between the 2016 SHMA and 2024 LHNA and will likely continue to change moving forwards. This needs to be recognised in the Policy to ensure that it is sufficiently flexible to meet needs at the time a development comes forward.

Q4 *Is Policy DES3 consistent with paragraphs 128 and 146 of the Framework insofar as making an efficient use of land is concerned?*

1.8 This Policy seeks a minimum density of 40 dwellings per hectare or higher if the site context is already at a higher density. This is aspirational and consistent with the approach advocated in the Framework. For Broad Locations, there may be locally specific/ design/ place-making reasons for areas of lower density. For example, the Harpenden Neighbourhood Plan seeks a proportion of bungalows. Thus, the Policy would benefit from clarification that the density will be an average measure on larger sites/ Broad Locations to allow locally specific, place-based responses.

Issue 2 – Affordable and Specialist Housing

Q1 *What is the forecast level of affordable housing need arising over the Plan period? Is this set out in the Plan and clear to decision-makers, developers and local communities?*

1.9 The forecast level of affordable housing need is not included in the supporting text to Policy HOU2. The LHNA (2024) estimates annual affordable housing needs in St Albans to be 802. This is almost the same as the overall housing requirement for the District (885 dwellings per annum). It serves to identify the acute need for affordable housing in St Albans District but has limited benefit in terms of the mechanics of Policy HOU2 which seeks 40% affordable housing as a balance between market and affordable.

Q2 *Will the Plan ensure that affordable housing needs are met? If not, what modifications could be made to ensure that needs are met in full?*

1.10 No comments.

Q3 *What are the thresholds for the provision of affordable homes based on and is Policy HOU2 justified (including in respect of Class C2 accommodation)?*

1.11 No comments.

Q4 *Is the viability review clause in Policy HOU2 justified and effective?*

1.12 This element of the Policy (part h)) is overly prescriptive and not sufficiently flexible to allow the optimum time for a viability review to be agreed. This may not be 80% occupations in all circumstances.

- 1.13 Moreover, it assumes that a financial review will always be required where full policy compliance is not achieved. There may be circumstances where a tenure split/ mix that deviates from Policies HOU1 and HOU2 is the preferred response, but this would not provide 'full policy compliance' as per part h) and so would trigger the review mechanism.
- 1.14 It may also be the case that certain developments will carry elevated build costs owing to site-specific factors and/ or be required to deliver significant (abnormal) infrastructure but the benefits of the development are such that these are necessary to unlock delivery. The viability of such developments would not be linked to economic cycles (as referenced in the PPG) thus viability is unlikely to improve if economic conditions improve and a viability review should not apply.
- 1.15 In short, viability reviews may be appropriate in some circumstances but not all. Where appropriate, there may be different points at which the review should be undertaken. Part h) of Policy HOU2 should be amended to clarify that the need for a viability review will be assessed on a site-by-site basis based on the specific circumstances of each case and, if a review is required, the timing of this is to be agreed.

Q5 How have the figures in Policy HOU3 been established and is the policy justified?

- 1.16 No comments.

Q6 How will the Plan be effective in meeting the needs identified in Policy HOU3? Is it sufficiently clear in this regard?

- 1.17 No comments.

Q7 Collectively, do Policy HOU2 and HOU3 provide a clear basis for establishing what level of affordable housing is required from non-C3 Use Class development? Are the requirements deliverable and viable?

- 1.18 No comments.

Issue 3 – Accessible and Adaptable Housing

- 1.19 No comments.

Issue 4 – Self-Build and Custom Housebuilding

Q1 What is the anticipated need for Self and Custom Build over the Plan period? Does Policy HOU5 provide an appropriate basis for meeting that need?

- 1.20 No comments.

Q2 Are the requirements of Policy HOU5 justified, and will they be effective?

- 1.21 Part d) of Policy HOU5 is not justified. This requires unsold plots to remain on the open market indefinitely or be offered to the Council or a registered provider before they can revert to market housing. This would have the effect of increasing the affordable housing requirement to 43%. The Local Plan Viability Assessment (2024) only tested up to 40% affordable housing thus it is unknown as to whether developments can viably support 43% if unsold plots cannot revert to market housing.

- 1.22 The requirement for unsold plots to be offered to the Council or a registered provider should be removed. Alternatively, the 3% requirement for self/ custom build should be discounted from the affordable housing requirement.