

## EAST HERTS DISTRICT PLAN 2011-2033 EIP – PART 2

### DETAILED POLICIES: CHAPTER 14: HOUSING

#### REPRESENTATIONS PREPARED BY LICHFIELDS ON BEHALF OF ST WILLIAM HOMES

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#### **3. HOU8 self-build housing – Criterion I, would the 200 unit site threshold and 5% proportion of dwelling plots for sale to self-builders be justified and appropriate? How would this apply to developments for flats?**

- 1 The basis on which the figure of 5% has been reached is not clear, nor is the threshold of 200 dwellings explained within the evidence base.
- 2 Notwithstanding the lack of justification, it is considered that the requirement of this policy is incompatible with development on an urban brownfield site and, therefore, inappropriate. While it is conceivable that some self-build housing may be possible on detached plots within greenfield sites, such a requirement would clearly be incompatible with apartments or terraced housing, which would require a comprehensive and coordinated approach to design and construction.
- 3 The complexity involved in the construction of apartments is likely to be beyond the skills and ambition of a self-builder or an association of builders. Also terraces would require arrangements between different builders and the level of complexity and collaboration required is unlikely to appeal to prospective self-builders compared against plots where construction would take place within an area of single ownership.
- 4 Furthermore, due to the former land use of brownfield sites they're often subject to high levels of contamination, which will require extensive remediation to allow for residential end use, the cost of the remediation alone is likely to deem self-build housing unviable.
- 5 Such sites also often involve complicated site specific infrastructure works and this requires specialist knowledge and skills to deliver. Allocating parcels of land to self-builders without the experience and expertise to deliver higher density housing would, therefore, not be practicable.
- 6 It is also considered that allocating larger portions of land for detached dwellings would be inappropriate in urban locations. It would result in low density housing in an urban area within walking distance of a rail station which would be contrary to the policy intention to maximise the housing contribution of such locations. It would also reduce the delivery of housing which would not be a justified (in the context of para. 182 of the NPPF) in a District with an acute housing shortage.
- 7 It is, therefore, requested that Policy HOU8 is amended as follows:

*“To support prospective self-builders, on appropriate sites of more than 200 dwellings, developers should investigate the potential to provide ~~will be expected to supply 5% of dwelling~~ plots for sale to self-builders, having regard to the ~~need~~ interest identified on the Council's Self-Build and Custom Build Register. This policy will not apply to development of previously developed land.”*