

**CD11.13**

# **Technical Note**

Housing Need and  
“Affordable” Housing

From

*Greenbelt* (Rule 6 Party)

Presented by Paul King

(Member and Advocate for Greenbelt)



In the appeal: APP/B1930/W/24/3343986

Planning Application Reference: 22/0267

Land between caravan site and Watling Street,  
Park Street, St Albans, AL2 2PZ

### **Personal Profile**

I graduated from Liverpool University with an Honours degree in Engineering. I have lived in Park Street for 32 years and have spent 33 years involved in the property market, gaining extensive experience in three key roles:

- 1) As a landlord for 33 years, I am familiar with the rental market and property management in the south-east, including the local area.
- 2) I set up, and ran a sales and lettings company operating in the local area, which entailed undertaking every aspect of the business including sourcing land for development, interfacing with developers, but most of all ensuring that all clients received a professional service. I trained numerous staff to undertake their roles to a similar professional standard, including valuing properties and interfacing with clients and the public. I am therefore familiar with the workings of the local market throughout the price ranges, along with the technical aspects of the sales process, demand dynamics and valuing properties, including around Park Street.
- 3) As the owner of letting and property management business for 20 years, I have extensive experience of the residential lettings industry, including opportunities and issues relating to the least well off tenants, to large company lets.

The evidence which I have prepared and provide for this appeal reference APP/B1930/W/24/3343986 in this proof of evidence, is true and I confirm that the opinions expressed are my true professional opinions.

### **Housing Need and “Affordable” Housing**

1. The proposal that 95 houses be built on this 4.3 hectare site provides a density of 22 units per hectare. If the objective is to address the un-met housing need, and specifically to provide truly low cost houses, the development will not achieve this.

Whilst it might be inappropriate to build high density housing in this beautiful open countryside setting (1994 Local Plan, Saved Policy 5), **(CD5.1)** building at the specified density would give rise to enhanced priced residences due to their plot size, Green Belt setting and the adjacent open countryside. Thus, any properties offered for sale or rent with a 20% discount, would still be more expensive than equivalent houses in standard residential roads in the same area.

2. Under the December 2023 NPPF, paragraph 6 **(CD5.3)**, 25% of the “Affordable” homes must be offered under the First Homes Scheme, which the new government has pledged to abolish via the new draft NPPF.



The First Home scheme provides a discount of 30-50% off market price, so even taking into account the premium location, and hence enhanced prices of these houses, they would still be cheaper than would be available elsewhere in the area. However, would likely comprise the one bedroom units.

3. At this stage there is no agreed provision for any Social Rent units to be built on the site and there is nothing in the Saved Policies from the 1994 Local Plan, or any other local or national policy, which dictates that there should be any minimum level of social housing provided in such developments. The new government, through the draft NPPF is proposing that such requirements be introduced, but these are only proposals at this stage.

4. The draft Unilateral Undertaking of 12/6/24 stipulates: *“a ratio of 2:1 Affordable Rented Housing to Shared Ownership Housing”*, however this does not address the issue of Social Rented housing.

5. The Appellant’s indicative housing split in table 5 at 6.37 of the Maddox Planning Statement, gives an average bedrooms per unit of 2.66, which breaks down to **3.0** for market units and **2.16** for “affordable” units. Thus the “affordable” headline figure of 40% drops to 32.4% when assessed in terms of the number of bedrooms.

6. Assuming that the First Home Scheme units were mainly smaller one bedroom ones, the amount of the site allocated to these, in terms of the number of bedrooms, could be as low as 4.0%. Thus the amount of the site that directly contributes to the real local housing need could be only 4%. However, these are still houses for sale, there would not be any units committed to social rent.

7. The core issue in relation to “affordable” housing, is that when developments are built in a setting that will give rise to a premium price, such as this, unless the “affordable” units are a special designation eg Social Rent or First Home Scheme properties, they will often not sell or rent for any less than equivalent market houses in nearby residential streets, thus undermining the objective of creating cheaper housing.

8. The market housing provided by the proposed development, would be 57, mainly 3 and 4 bedroom properties (Maddox Planning Statement). The unique semi-rural location would attract a premium on the sales price, like the “affordable” allocation mentioned above.

9. Developments such as these, usually attract a high level of interest from purchasers seeking to move out from the more expensive areas of North London. They often sell their smaller house or flat, at a high price, move into a commuter belt location, buy a larger house in a pleasant setting for less money to raise a family, and bank the difference in price. Developers actively promote their sites to these purchasers, because they know that they can maximise the sale price, hence profit.



10. The net result of all of the above, would be a disastrous loss of effective Green Belt, in order to “import” buyers from more expensive areas and do very little to address the true local housing need.

11. The scheme provides no commitment to social rented housing and therefore one of the reasons that the application was refused at the January planning meeting, is valid.

12. On 16/8/24 the Council suggested a revised Unilateral Undertaking, which for the first time specified a housing mix within the “Affordable” allocation. This proposes 30% of the “Affordable” houses as Social Rent ie 11 units. The Appellant is yet to respond to this proposal. Even if they were agreeable, since these would be from within the “Affordable” housing allocation which are smaller properties, it would still represent a small proportion of the site and an even smaller proportion when assessed on the number of bedrooms.

