

CD11.28

Rebuttal Evidence

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

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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 experienced 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.

1. Introduction

I address matters raised subsequent to my proof of evidence submission.



2. Affordable Housing Mix

On 19 August the Appellant indicated a mix of the affordable housing for the first time in the draft Unilateral Undertaking. This was the day after the submission of my Technical Note of the matter. This now includes 35% of social rent, by units. ie 35% of 40% of 95, or 13 units.

3. Housing Mix

Maddox planning statement and version F of the layout plan provided a housing mix, detailed in Appendix A1. However the draft Unilateral Undertaking of 19 August, which was originally produced by the Appellant (CD14.11) showed a housing mix that was completely different with many more large market houses, and smaller affordable houses. In subsequent emails in relation to the Unilateral Undertaking, the Appellant asked that this mix be removed along with the statement:

“The Final Dwelling Mix may (or may not) be different at the reserved matters stage, but the relevant contributions are adequately dealt with by reference to Table 1”.

Table 1 is the contribution by property type.

The strong indication being that that at Reserved Matters, the revised dwelling mix (or something similar) will be submitted, in place of that shown on the Indicative Plan.

The revised mix changes the profile of the scheme quite significantly, with the average number of bedrooms for the affordable houses dropping, whilst the average for the market element jumps from 3.0 to 3.68.

4. Affordable Housing when Assessed by Bedrooms

The original housing mix provided 40% affordable dwellings, if assessed by units. However when assessed by bedrooms this drops to 32.4% (Appendix A1)

The indicative mix shown on page 53 of the draft Unilateral Undertaking of 19//24 (CD14.11), gives only 25.8% affordable dwellings, when assessed by the number of bedrooms (Appendix A2).

5. New Draft NPPF

Paragraph 155a (CD6.5) of the new draft NPPF would require and Affordable Housing allocation of 50%, when a development was given permission on Green Belt land. Whilst this is only a draft and is unlikely to be implemented prior to a decision on this appeal, it indicates how this current scheme isn't as robust in addressing the affordable housing deficit in the district as it is made out to be.



Appendix A1

Maddox Planning Statement - Page 27 (CD1.24 and Layout Plan F (CD2.1)

The affordable housing allocation when assessed by the number of units v bedrooms

| <u>Type</u> | <u>Beds</u> | <u>Units</u> | | <u>% Afford</u> | <u>Beds</u> | | <u>% Afford</u> | | |
|------------------------------|-------------|-------------------|---------------|---------------------|-------------------|---------------|---------------------|------------|-------------|
| | | <u>Affordable</u> | <u>Market</u> | | <u>Affordable</u> | <u>Market</u> | | | |
| Flat | 1 | 6 | | | 6 | 0 | | | |
| Bungalow | 1 | 2 | | | 2 | 0 | | | |
| Maisonette | 1 | 2 | | | 2 | 0 | | | |
| House | 2 | 4 | 11 | | 8 | 22 | | | |
| Flat | 2 | 9 | | | 18 | 0 | | | |
| Bungalow | 2 | 2 | 3 | | 4 | 6 | | | |
| House | 3 | 10 | 25 | | 30 | 75 | | | |
| Bungalow | 3 | | 4 | | 0 | 12 | | | |
| House | 4 | 3 | 14 | | 12 | 56 | | | |
| Total | | 38 | 57 | 95 | 40.0 | 82 | 171 | 253 | 32.4 |
| Average Beds/unit Overall | | 2.66 | | | | | | | |
| Average Beds/unit Market | | 3.00 | | | | | | | |
| Average Beds/unit Affordable | | 2.16 | | | | | | | |

Unilateral Undertaking 19/8/24 (CD14.11)

The affordable housing allocation when assessed by the number of units v bedrooms

| <u>Type</u> | <u>Beds</u> | <u>Units</u> | | <u>% Afford</u> | <u>Beds</u> | | <u>% Afford</u> | | |
|------------------------------|-------------|-------------------|---------------|---------------------|-------------------|---------------|---------------------|------------|-------------|
| | | <u>Affordable</u> | <u>Market</u> | | <u>Affordable</u> | <u>Market</u> | | | |
| Flat | 1 | 13 | | | 13 | 0 | | | |
| Bungalow | 1 | | | | 0 | 0 | | | |
| Maisonette | 1 | | | | 0 | 0 | | | |
| House | 2 | | | | 0 | 0 | | | |
| Flat | 2 | 17 | | | 34 | 0 | | | |
| Bungalow | 2 | | | | 0 | 0 | | | |
| House | 3 | 6 | 18 | | 18 | 54 | | | |
| Bungalow | 3 | | | | 0 | 0 | | | |
| House | 4 | 2 | 39 | | 8 | 156 | | | |
| Total | | 38 | 57 | 95 | 40.0 | 73 | 210 | 283 | 25.8 |
| Average Beds/unit Overall | | 2.98 | | | | | | | |
| Average Beds/unit Market | | 3.68 | | | | | | | |
| Average Beds/unit Affordable | | 1.92 | | | | | | | |

