



**PATHFINDER**  
DEVELOPMENT CONSULTANTS

**Housing Need and Affordable Housing  
Rebuttal Proof of Evidence of Martin Aust  
BSc (Hons) DMS MRICS CMCIH**

**Land Between Caravan Site And Watling Street, Park Street,  
St Albans**

Outline application (access) - Erection of up to 95 dwellings, including 40% affordable dwellings and 5% self-build and custom build dwellings, public open space, landscaping and associated infrastructure.

**August 2024**

## Rebuttal to Paul King's Technical Note (on behalf of the Rule 6 Party): Housing Need and Affordable Housing

In this rebuttal proof of evidence, I have not sought to provide a comprehensive response to the Rule 6 Party's evidence. The approach set out below is to identify specific matters referenced within the Technical Note of Mr Paul King (CD11.13) on which the Inspector may find it helpful to have a written response in advance of the inquiry. If I have not responded to or referred to other points in Mr King's evidence, it is not because I have accepted these points.

I present these rebuttal comments with reference to the specific paragraphs within Mr King's Technical Note for ease of cross-referencing. This rebuttal proof responds to matters raised within the Rule 6 Party's Technical Note: *Housing Need and "Affordable" Housing* (CD11.13) only:

1. Mr King's comments appear to be based on the assertion that homes planned will be built to a lower density thus being more valuable than surrounding existing higher density homes. His assertion that this will render them unaffordable misunderstands how affordable housing will be delivered. He references a 20% discount, which can only relate to the 30% of the proposed affordable housing that is to be delivered as Affordable Rent.

The draft Unilateral Undertaking proposes the delivery of 40% affordable housing to meet a variety of identified housing needs:

- 30% Social Rent
- 30% Affordable Rent
- 25% First Homes
- 15% Other Affordable Routes to Home Ownership (including Shared Ownership).

This proposed affordable housing provision exactly replicates the Regulation 18 Draft Local Plan provision and is in excess of the current adopted Local Plan by 5%.

Affordable rented homes are proposed to be delivered at rents not exceeding 80% of the local market rent (inclusive of service charges), but also not exceeding the Local Housing Allowance further securing their affordability. This is set by the Valuation Office Agency (of the HMRC) at the 30th percentile point for rents in each size by Broad Rental Market Area (to avoid distortions in particularly high or low value neighbourhoods). St Albans sits in the BRMA for Southwest Hertfordshire. Affordable rented homes are a tenure recognised within the NPPF as being affordable homes.

Social Rented homes will benefit from lower rent levels.

2. 25% of the planned affordable homes are to be First Homes. This is a current requirement within the NPPF. First Homes must have a maximum Market Value of £357,000 and a discounted sale price of £250,000 (at the minimum discount of 30% against market value), and be sold to first time buyers with a household income of no more than £80,000.
3. Mr King asserts that there are no Social Rented properties proposed. This is not correct, as in line with the Regulation 18 Draft Local Plan, 30% of planned affordable homes are to be Social Rent. This change was made by the Appellant as a tracked change to the draft Unilateral Undertaking dated 18<sup>th</sup> July, which was shared with Mr King on the 19<sup>th</sup> of July.
4. Mr King's assertion on a 2:1 ratio of affordable rented homes and shared ownership is not correct as noted above, or indeed in line with his comments at paragraph 12 of his Technical Note.
5. Both the Council's current policy of 35% affordable housing and the Regulation 18 Draft Local Plan policy of 40% affordable housing are based on the number of dwellings (not bedrooms) to be provided. This ensures the mix of house types delivered match those required by households in housing need.
6. 25% of the proposed affordable homes are First Homes in adherence to the NPPF and in line with the Regulation 18 Draft Local Plan requirement. 60% of the planned affordable homes are to be at Social and Affordable rents making these affordable to those on lower incomes and thus providing for a range of needs.
7. The affordable homes planned will meet a range of needs with tenures matching those defined in the NPPF and in line with the Regulation 18 Draft Local Plan requirement. For example, income limits exist for First Homes (matched by requirements for Registered Providers selling Shared Ownership).
8. Mr King's comments in Paragraph 8 do not appear to relate to 'Housing Need and Affordable Housing'.
9. Mr King's comments in Paragraph 9 do not appear to relate to 'Housing Need and Affordable Housing'.
10. The Appellant's proposals include the provision of 40% Affordable Housing for local people to address Housing Need.
11. The assertion that the planned scheme provides no Social Rented Housing is not correct. 30% of the planned affordable homes are to be Social Rent as outlined in the Unilateral Undertaking and acknowledged in Paragraph 12 of Mr King's Proof.
12. The draft Unilateral Undertaking has been prepared by the Appellant and the proposed mix within the Affordable Housing definition was provided by the Appellant as detailed above. The tenures proposed meet the Council's requirements and current housing need.

Martin Aust  
20<sup>th</sup> August 2024