

Summary Self-Build and Custom Housebuilding Evidence of Andrew Moger BA (Hons) MA MRTPI

Land to the rear of 42-100 Tollgate Road and 42
Tollgate Road, Colney Heath, St Albans

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Outline application (access sought) – Demolition of existing house and stables and the construction of up to 150 dwellings including affordable and self-build and custom housebuilding plots together with all ancillary works.

Land to the rear of 42-100 Tollgate Road and 42 Tollgate Road, Colney Heath, St Albans

Vistry Homes Ltd

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Introduction

Section 1

- 1.1 My name is **Andrew Moger**, and I am instructed by **Vistry Homes Ltd** to examine the Self-Build and Custom Housebuilding sector in St Albans City & District Council in relation to the appeal proposals.
- 1.2 My credentials in relation to the Self-Build and Custom Housebuilding sector are as follows:
- I hold a Bachelor of Arts (Hons) degree in Design, Development and Regeneration from Nottingham Trent University (2005) and a Master's degree in Spatial Planning from Birmingham City University (2009). I am a Chartered Member of the Royal Town Planning Institute.
 - I have more than 15 years professional experience in the field of town planning and housing. I was employed across various local authorities in the East Midlands, Lincolnshire and South West regions between 2006 and 2012 and I have been in private practice since 2013.
 - I have previously provided evidence on the need for Self-Build and Custom Housebuilding serviced plots to meet identified demand at numerous Section 78 inquiries, Hearings and at Local Plan Examinations.
 - I acted as planning consultant for Carillion-Igloo Regeneration Partnership and Coastline Housing Association to secure consent for 54 Custom Build homes, 70 affordable homes and 20 open market dwellings in Pool, Cornwall in 2015. This was the first pilot scheme implemented by Homes England to kick-start the Government's commitment to maximising opportunities for Custom Build homes and tap into the growing demand from the British public to create their own unique and individual home.
 - I advised on the Frome Neighbourhood Plan in relation to the introduction of a Self-Build and Custom Housebuilding policy to encourage community-led housing and co-housing.
 - I am retained by the Department for Levelling Up, Housing & Communities funded Right to Build Task Force to act for a range of clients as a national Self-Build and

Custom Housebuilding expert. The Task Force has been established by the National Custom and Self-Build Association (NaCSBA) to help local authorities, community groups and other organisations across the UK to deliver Self-Build and Custom Housebuilding projects. The Task Force is Government endorsed and funded, having been recognised in the Housing White Paper: Fixing our Broken Housing Market.

- I have advised a number of private clients on Self-Build and Custom Housebuilding schemes through my role within the Right to Build Task Force in Bristol, Suffolk and Cornwall as well as advising local authorities in Devon, Carlisle, Eden, Humberside, Essex and Oxfordshire on their Self-Build and Custom Housebuilding Registers and their Policy approach.
- I am retained by Self-Build and Design Magazine to provide an 'ask-an-expert' service and deliver seminars on Self-Build and Custom Housebuilding at both their annual East and West Self-Build and Design Shows.
- I am the retained planning consultant for Custom Build Homes, the UK's leading Custom Build specialists.

1.3 The appeal scheme seeks outline planning permission for up to 150 dwellings, up to 9 of which (10% of market units) are which are to be provided as self-build and custom housebuilding plots in line with the legislative definitions in the 2015 Self-Build and Custom Housebuilding Act (as amended).

1.4 In preparing this Evidence reliance has been placed upon information sought through a Freedom of Information (FOI) request that was submitted to St Albans Borough Council on 3 April 2023 requesting a range of information relating to the Self-Build Register. The Council's response was received on 18 April 2023..

Self-Build and Custom Housebuilding as an Important Material Consideration

Section 2

- 2.1 Central Government has been consistent in seeking to boost the supply of Self-Build and Custom Housebuilding for the past decade, starting with the 2011 Housing Strategy for England, and it is clear that there is national demand for this type of housing.
- 2.2 As recently as April 2021 the Government announced an Action Plan intended to scale up delivery and provide funding support for self and custom-builders and more recently, the 'Bacon Review' made a series of recommendations to Government to scale up the delivery of self-build and custom housebuilding.
- 2.3 The Government announced these recommendations will be considered through the Levelling Up and Regeneration Bill (LURB) and have proposed changes to the 2015 Self-Build and Custom Housebuilding Act (as amended) to ensure that only permissions genuinely for self-build and custom housebuilding are counted towards addressing the statutory duty to meet Register demand, any unmet demand is carried forward and that regulations will specify which types of development permission count towards the duty.
- 2.4 The requirement to deliver Self-Build and Custom Build homes is enshrined in statute and within national policy through both the NPPF 2021 and the PPG.
- 2.5 Local authorities are required to address this through granting sufficient development consents to meet the demand for Self-Build and Custom Housebuilding arising within their administrative area and examining secondary data sources in addition to their Register numbers to obtain a robust assessment of demand.

The Development Plan and Other Material Considerations

Section 3

- 3.1 The saved policies of the District Local Plan Review (1994) do not contain any reference to Self-Build or Custom Housebuilding whilst the emerging plan is at an early stage of development, has yet to be tested at Examination in Public and has a number of unresolved objections.
- 3.2 The 2015 Self-Build and Custom Housebuilding Act (as amended) places a statutory duty on the council to have met demand arising from each Base Period of its Register within three years of the end of each Base Period.
- 3.3 The PPG is clear that to undertake a robust assessment of demand the register is supplemented with secondary data sources to understand and consider future needs for this type of housing.

Self-Build and Custom Housebuilding Demand in St Albans

Section 4

- 4.1 The Council's Self-Build Register demonstrates that demand in the district is very high, but whilst the register is an important tool to help gauge local demand and inform how many permissioned serviced plots need to be made available on a rolling basis each year by the Council, but it cannot predict longer term demand for plots.

Figure 4.1: St Albans Self-Build Register

Base Period	Entries		Date by which demand must be met
	Individual	Association of Individuals	
1 (1 April 2016 to 30 October 2016)	108	0	30 October 2019
2 (31 October 2016 to 30 October 2017)	140	1*	30 October 2020
3 (31 October 2017 to 30 October 2018)	104	0	30 October 2021
4 (31 October 2018 to 30 October 2019)	87	0	30 October 2022
5 (31 October 2019 to 30 October 2020)	76	0	30 October 2023
6 (31 October 2020 to 30 October 2021)	130	2**	30 October 2024
7 (31 October 2021 to 30 October 2022)	87	0	30 October 2025
Totals	732	3	
	735¹		

Source: FOI Response (18 April 2023); St Albans Authority Monitoring Report (2022)

*4 Individuals in 1 group according to Authority's Monitoring Report 2022

**9 Individuals in 2 groups according to Authority's Monitoring Report 2022

¹ There is a total need for 745 plots when taking into account the number of individuals within each of the two associations of individuals

- 4.2 In my opinion current practice has shown that local Self-Build Registers only provide a short-term supply-led picture because they rely upon people knowing about the Self-Build Register and then Registering their interest. I consider that the numbers on the Self-Build Register can therefore be a significant under-representation of latent demand.
- 4.3 The industry leading building plot search website is Plot-Search, operated by Buildstore Custom Build Homes. Information received from Buildstore Custom Build Homes indicates that² within the St Albans administrative area³ there were 1,413 registrants on their platforms within the authority area who are seeking a serviced plot to self or custom build.
- 4.4 At Parish level, the Buildstore Custom Build Homes data found that in July 2023 there were 126 registrants on their platforms within Colney Heath Parish as seeking a plot to self or custom build (9% of authority-wide demand).
- 4.5 Other secondary data sources indicate that as many as 2,320 people may be interested in building their own home in the foreseeable future when Ipsos Mori and NaCSBA polling data is applied on a local level, or between 1,116 and 1,602 over the emerging Plan period when AMA Market Research data is applied locally.
- 4.6 The importance of secondary data sources was recognised by Inspector Hayden in the Pear Tree Lane decision and Inspector Masters in the Bullen's Green Lane, Colney Heath decision.
- 4.7 The appellant recognises that there is a substantial level of unmet need for this tenure of housing in St Albans. The importance placed upon the provision of Self-Build and Custom Housebuilding plots by statute and by both the NPPF and the PPG has also been recognised by the appellant.

² In July 2023

³ Based upon the postcodes within the St Albans administrative boundary.

Self-Build and Custom Housebuilding Supply in St Albans

Section 5

- 5.1 Just 31 permissions (providing 31 plots) within the supply provided by the Council's FOI response contained evidence within the application material that they were for, or provided an element of, self-build and custom housebuilding where the initial owner has had, or will have, primary input into design and layout.
- 5.2 This resulted in a total of 13 plots towards Base Period 1 demand, 7 plots towards Base Period 2 demand, 4 plots towards Base Period 3 demand and 7 towards Base Period 4 demand.
- 5.3 This constitutes a shortfall of 95 plots in Base Period 1, 137 plots in Base Period 2, 100 in Base Period 3 and a further 80 in Base Period 4. Cumulatively, by the end of Base Period 4, the shortfall stood at 412 plots.
- 5.4 The emerging Plan strategy appears destined to fail to meet both existing unmet needs as well as future needs for this type of housing. There is a very substantial level of unmet need for this tenure of housing in St Albans which the appeal proposals would help to address.

Weight to be attributed to the provision of Self-Build and Custom Housebuilding

Section 6

- 6.1. The evidence shows that there is a very substantial unmet demand for Self-Build and Custom Housebuilding plots within St Albans.
- 6.2. Other appeal decisions have found that substantial weight has been afforded to the provision of serviced plots for self-build and custom housebuilding by Inspectors and the Secretary of State:
- Even where such provision is in line with policy requirements;
 - Where statutory duty failure has occurred, even if only for a single base period;
 - Where secondary data sources demonstrate a level of demand that exceeds that on the Self-Build Register;
 - Prior to demonstration of any statutory failure;
 - Within the Green Belt; and
 - Where the shortfall is considerably lower than that in St Albans City & District.
- 6.3. There is no adopted policy specifically relating to Self-Build and Custom Housebuilding within the Development Plan and the emerging Local Plan is at an early stage of development, has yet to be tested at Examination in Public and has a number of unresolved objections.
- 6.4. In any event, cumulatively across the emerging Plan period to 2041, the emerging plan would make provision for a total of just 306 serviced plots. It is important to view this in the context of the existing shortfall across Base Periods 1, 2, 3, 4 and 5 already standing at 488 plots.
- 6.5. The emerging Plan strategy would only address 62% of the shortfall that already exists, and that is before one even considers the need for a further 226 plots arising from Base Periods 6 and 7
- 6.6. The emerging Plan strategy appears destined to fail to meet both existing unmet needs as well as future needs for this type of housing.

- 6.7. In light of the very substantial level of unmet need identified, the failure of the adopted and emerging Plan strategy to address this, the benefits of providing 9 serviced plots for self-build and custom housebuilding would be very substantial.
- 6.8. The appeal scheme makes provision for 10% of open market units to be provided as serviced pots for self-build and custom housebuilding which equates to 9 serviced plots. The provision of 9 serviced plot is equivalent to 6% of the total number of units (150) to be provided through the appeal proposals, which is double the emerging policy requirement in the emerging Plan.
- 6.9. I consider therefore that nothing less than **very substantial weight** should be afforded to the provision of 9 self-build and custom housebuilding plots in the determination of this appeal.
- 6.10. The reason why it is considered this weight to be appropriate in respect of the provision of 9 serviced plots from the appeal site can be summarised as follows:
- There is a cumulative unmet need for at least 488 serviced plots across Base Periods 1, 2, 3, 4 and 5 of the Council's self-build register;
 - Secondary data sources indicate that latent demand exceeds the numbers on the Council's Register;
 - The Council has no adopted Development Plan policy to address the unmet needs of self and custom builders;
 - The Council needs sites such as this to make provision for serviced plots to address the very substantial unmet needs that the Plan strategy has failed to meet;
 - Since the Bullens Green Lane appeal decision – where substantial weight was awarded to 10 plots, 5 of which were in St Albans - the situation for prospective self and custom builders has worsened with the shortfall in delivery against the Council's self-build register having increased by 120% to 412 plots;
 - The shortfall in delivery since the Bullens Green Lane decision will have increased by 160% by 30 October 2023 unless the Council consents 488 serviced plots before then.