

# First Homes Consultation Response from Pocket Living

April 2020



If adopted by the Government, Pocket Living's proposals outlined in this response will allow the Government to:

- Create a First Homes product that helps the right people and is trusted by consumers and local authorities alike
- Create a dependable framework that will deliver the First Homes at scale, long term
- Secure a supply of First Homes through a small sites policy which will facilitate much faster delivery of the Government's programme

## Executive Summary

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- a. Pocket Living (Pocket) is the UK's only private developer delivering grant-free discounted affordable homes for sale for first time buyers; as such we are the UK's first developer of First Homes. Many of our buyers are the very frontline workers currently keeping the country together today.
- b. In these exceptional times the Government has recognised the importance of continuing to build the homes that the country needs, for social and economic reasons. Given the economic fragility created by the pandemic, it is key that government policies support a fast recovery and that government considers whether the time is right to introduce such a significant change to planning policy such as First Homes. We would suggest the priority must be a return to normality and stability first.
- c. Pocket fully supports the Government's objective of helping first time buyers on to the housing ladder, and our response highlights ways to best achieve this based on extensive experience. After many years of delivery, Pocket is well placed to help make First Homes a national reality; to all intents and purposes, we have been delivering First Homes since we set up the business in 2005, so we understand the challenges of viability, planning, construction, management and local politics better than most.
- d. When the policy is introduced, Pocket suggests a focus on the following areas to ensure the policy is a success and First Homes are delivered:
  - i. Creating a First Homes product that helps the right people and is trusted by consumers and local authorities alike
    - First Homes should be restricted to first time buyers who live or work locally and earn under the affordable homes' income cap for their area (i.e. £90,000 in London) with the homes subject to a value cap (i.e. £600,000 in London). This will ensure that they go to those in most need and get local support.
    - Critical oversight of sub-letting and resales will ensure that the homes benefit those that need them and that a stock of First Homes is built up and maintained long term.
    - Without careful management, trust in First Homes could be undermined early.

- ii. Create a dependable framework that will deliver First Homes at scale, long-term
  - Pocket is already delivering homes at a 20% discount in line with the NPPF and has a pipeline of over 1,000 homes. Extensive modelling based on our portfolio of sites shows that a 30% discount will reduce the number of affordable Pocket homes delivered by 60% and the total number of homes by 20% (in some cases we deliver some market homes where required by planning).
  - To maximise viable delivery of First Homes, the minimum discount should be 20%, with a maximum of 30% established through the local plan.
  - 60% of first time buyers are single or childless couples; First Homes should be focused on one and two bedroom homes. A three bedroom First Home in outer London would require a subsidy of £180,000 at today's prices; enough to pay for three Pocket one bed homes.
- iii. Secure a supply of First Homes through a small sites policy which will facilitate much faster of the Government's programme
  - Reliance of delivering First Homes through S106 agreements on planning permissions and exception sites will mean delivery is very slow. Even with new or amended legislation, meaningful delivery will take years.
  - First time buyer affordability continues to worsen in London: in 1996, 93% of first time buyers borrowing at 4.5x salary could afford the cheapest home in their in local area. This has fallen to just 35% and affordability continues to worsen. Young people cannot wait for exception sites and the planning system to deliver: it is critical for them that First Homes policy is a success.
  - A fast track framework for the delivery of First Homes on small sites will create the speed and additionality the Government wants and will help people onto the housing ladder quickly. The challenges of delivering small sites are illustrated by the much-chronicled decline in small developers. Small sites make up just a tenth of housing delivery in London, deliver very few affordable homes and have the highest rates of planning refusals. Providing a streamlined and fast track planning process, including a presumption in favour of development, for applications delivering over 40% First Homes will transform these sites and the SME developer sector.
- e. Proposals for an effective framework to deliver First Homes:

First Homes should be targeted at those who need them, with income and price caps, a minimum discount of 20% and maximum discount of 30% and administration to ensure their ongoing integrity

- **Only first time buyers should be eligible** for First Homes, it should be their sole residence and they must have a mortgage of at least 25%.
- **Income thresholds** for buyers should ensure that those most in need of help are targeted (current affordable housing caps - £90,000 in London).
- **Purchasers should live or work locally**, and the local connection policy should be set nationally to ensure equity.
- **The value of First Homes should be capped**, with a higher cap in London, as with Help to Buy (£600,00 in London).
- **The discount should be a minimum of 20% with a maximum of 30%**, established through the local plan.

- **The mix of homes should be set out in local policy** and based on local evidence of first time buyer households; likely to be predominantly one bedroom homes.
- **An administrator should manage the homes** to ensure that they are occupied by the purchaser, not sub-let (other than in exceptional circumstances) and are sold on to eligible buyers at the correct discount – maintaining it in perpetuity.

Small sites should be the main focus of delivery of First Homes with a streamlined planning process for small sites established the NPPF for sites delivering more than 40% First Homes. The NPPF should require local authorities to identify small sites for First Homes, support those brought forward by developers and promote a fast track approach to planning and presumption in favour of development

- Small sites should be the focus of delivery of First Homes with the NPPF amended to require local authorities to allocate small sites (less than 0.25 hectares) for First Homes.
- A streamlined planning process should be created for small sites delivering more than 40% First Homes/affordable housing, with:
  - a presumption in favour of development
  - freedom over tenure and size mix
  - no viability testing
  - CIL exemption
- A fast track approach to planning should ensure fast delivery of small sites, from pre-application to discharge of conditions; eight weeks for planning determination, four weeks for the S106 agreement and six weeks to discharge conditions.
- **A presumption in favour of small sites would comprise:**
  - The principle of residential development being established
  - Local authorities providing design codes to guide development and applicants being able to propose a different approach with robust justification
  - Applications being approved unless it can be robustly demonstrated that the development would result in an unacceptable level of harm that outweighs the benefits of making the best use of small sites, delivering new homes and delivering First Homes.
- **Developers should be able to bring forward suitable sites where they are:**
  - 0.25 hectares or smaller
  - Brownfield sites
  - At least 40% First Homes
  - Well-served by public transport/local amenities
  - In an area where there is an identified need for First Homes
  - Well-designed beautiful homes and developments that complement their surrounds
- Local authorities should report annually on allocation of sites, permissions and delivery of First Homes, and this could become part of the Housing Delivery Test.

- f. Our response draws on our experience over the past fifteen years as the sole private sector deliverer of grant-free discounted affordable homes for sale to first time buyers i.e. First Homes. Our response includes our experience of the viability of delivering discounted homes for sale, as well as securing planning permission on small sites, managing the eligibility of our homes in perpetuity and negotiating effective mortgages with key lenders.

#### This response covers:

1. Pocket Living
2. Creating a First Homes product that helps the right people and is trusted by consumers and local authorities
3. Creating the framework to deliver the homes that first time buyers need and deliver First Homes at scale
4. Securing a supply of small sites to deliver First Homes
5. The need for a small sites policy to boost housing delivery
6. Why delivering First Homes through planning will be challenging
7. Consultation questions

# 1. Pocket Living

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1.1. Pocket Living is an innovative niche developer established in 2005 to deliver grant-free discounted affordable homes to purchase for first time buyers. Our homes are bought by those on moderate incomes who are essential to London’s economy but cannot afford to buy a market home and earn too much to qualify for social housing. Many of our residents are the people currently keeping the country going. We are still the only deliverer of such homes at scale. Pocket is essentially the UK’s first First Homes developer.

1.2. To date, we have delivered over 800 homes in 22 developments and have a pipeline of over 1,000 homes:

Year Built		Borough	Homes
2008	Weedington Road	Camden	22
2009	Bath Road	Hounslow	19
2012	Sudbury Heights	Ealing	39
2012	Fermoy Road	Westminster	32
2012	Star Road	Hammersmith and Fulham	18
2014	Apex Court	Hammersmith and Fulham	30
2015	Marcon Place	Hackney	33
2015	Oak Grove	Camden	17
2016	Western Road	Ealing	36
2016	Mountearl Gardens	Lambeth	32
2016	Willingham Terrace	Camden	18
2016	Marischal Road	Lewisham	26
2017	Sail Street	Lambeth	31
2017	Juxon Street	Lambeth	39
2017	Rosina Street	Hackney	31
2017	Wynne Road	Lambeth	25
2018	Arklow Road	Lewisham	44
2018	Cowleaze Road	Kingston	26
2018	Gainsford Road	Waltham Forest	45
2018	Mapleton Crescent	Wandsworth	89
2019	Bollo Lane	Ealing	112
2019	Varcoe Road	Southwark	57

## Projects under construction

	Borough	Homes
Harbard Close	Barking and Dagenham	78
Addiscombe Grove	Croydon	153
West Green Place	Haringey	126
Gardner Close	Redbridge	20

## Projects in planning

	Borough	Homes
Woodside Park	Barnet	86
Sudbury Town	Brent	52
Credon House	Southwark	57
Ossory Road	Southwark	105
Osier Way	Waltham Forest	196
Forest Road	Waltham Forest	90

- 1.3. In addition, we have a further three sites in the early stages of pre-application consultation and are close to securing our first site outside of London.
- 1.4. Pocket homes are sold at a 20% discount to local prices, verified by an independent RICS-accredited valuer, to eligible purchasers, defined by income and where they live or work. This enables purchasers to buy a home and stay in their community. Covenants in the lease ensure that the homes remain affordable in perpetuity. The homes accord with the NPPF definition: eligibility is determined with regard to local incomes and house prices and provisions ensure the homes remain at a discount for future eligible households.
- 1.5. Pocket homes are only sold to first time buyers. Provisions in the lease prevent sub-letting other than in exceptional circumstances of hardship, where permission is required from Pocket as 'administrator'. Pocket conducts an 'Annual Verification Process' (AVP) to ensure that the purchaser remains resident and hasn't sublet their property without permission.
- 1.6. Pocket specialises in delivering high quality developments on complex brownfield sites; bringing them back into beneficial use and improving the local streetscape. Pocket takes a design-led approach and has won many awards from RIBA London, the Evening Standard, CABE, The Sunday Times and National Housing Awards. The homes exceed space standards (national technical standards) and have been carefully designed to maximise usable space and provide a light, pleasant and efficient environment. A Pocket home can be viewed by [clicking here](#).
- 1.7. The design is continually evolving to respond to customer feedback and new innovations. The buildings and homes are designed to be energy efficient and minimise maintenance and service charge costs for residents in order to ensure that they are truly affordable. Pocket developments provide ample cycle parking and are car free.
- 1.8. Pocket is one of the first developers to embrace modular construction, from bathroom and utility pods to CLT and full volumetric modular construction where site conditions permit. Full modular construction has been most recently employed at Mapleton Crescent in Wandsworth, Bollo Lane in Ealing and Addiscombe Grove in Croydon. Mapleton Crescent is the tallest modular-for-sale residential tower in Europe. Over half our pipeline will be delivered through modular construction.
- 1.9. There are currently over 18,000 verified registrants on the Pocket Living website who live or work in London. Our purchasers' average age is 32, they are predominantly single, they have salaries from £30,000 a year and a third are key workers. On average, they rent for eight years before buying their Pocket home. About half our purchasers use Help to Buy to get on the housing ladder.
- 1.10. We are essentially delivering and managing First Homes, and our consultation response draws on fifteen years' experience of doing so.

## 2. Creating a First Homes product that helps the right people and is trusted by consumers and local authorities

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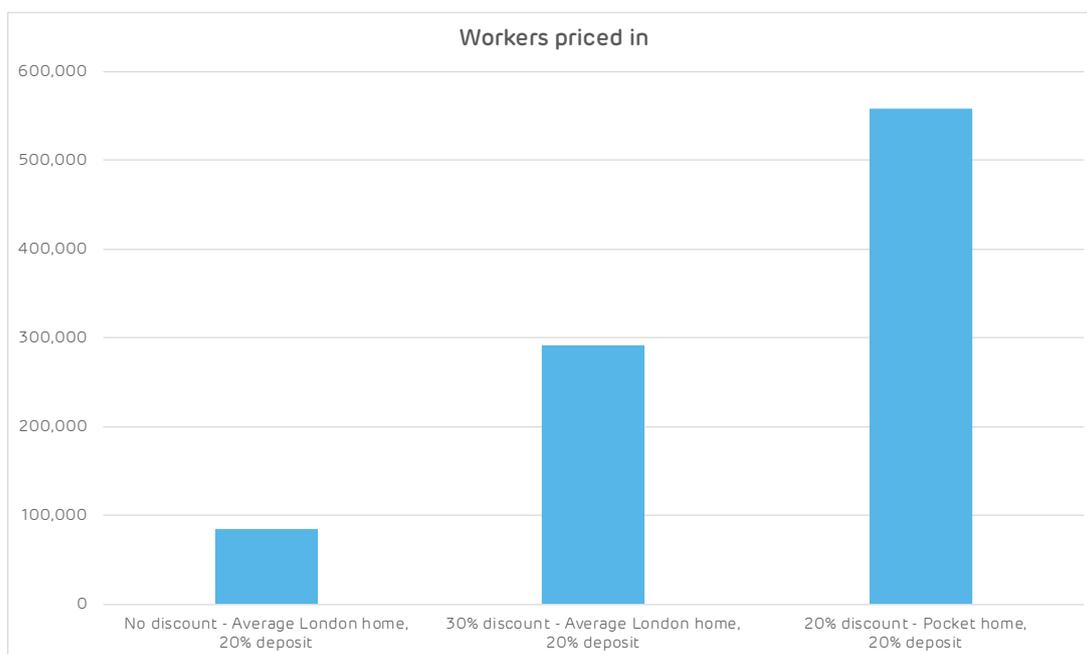
- 2.1. First Homes will be delivered as a result of a significant government intervention in planning (whether through policy or legislation) and will displace other types of affordable housing. The Government's own estimates in the consultation document suggest that up to 80% of affordable homes could be displaced. This could be higher depending on the mix and level of discount. It is estimated that the increase in the Affordable Homes Programme will not be sufficient to make up for this displacement. It is therefore important to ensure that they are targeted to benefit those that most need help.
- 2.2. To ensure that First Homes benefit those that most need them, they should be available only to first time buyers who live or work in the local authority and earn below a set income threshold. Purchasers should not be cash buyers, and the home should be their sole residence. They should not be able to sell in the first year after purchase, and sub-letting should only be permitted in exceptional circumstances. In our experience of managing long-term compliance with the rules of Pocket homes, anything short of these measures will create abuse and unwanted media criticism and will swiftly undermine this flagship government policy.
- 2.3. Pocket Living has extensive knowledge from working with local authorities and communities to get discounted homes delivered. Our depth of experience in this field has made it clear that without fair allocations processes for local people and long-term administration to ensure these homes remain for local moderate earners, delivery of these homes can be resisted.
- 2.4. First Homes will be affordable homes, secured through the planning system. It is important that the homes are lived in by those local people for whom they are intended and sold on to eligible first time buyers at the correct discount. This will require management and is essential to the integrity of the homes and trust in the First Homes policy.
- 2.5. Pocket Living is the 'administrator' of our affordable homes. This means that we ensure that the homes are initially sold to local eligible people; this allocations process is shared with the local authority. Pocket Living also manages the onward sale to eligible people and ensures that the discount is maintained. While owners are resident, they must take part in our Annual Verification Process, which requires them prove that they are living in the home by providing a valid council tax and utility bill. Our residents recognise that this is important to maintaining the integrity of the homes as intended and are happy to comply. The process is simple, predictable and regular and has proven to be scalable as Pocket Living has grown. We are currently trialling a highly-scalable digitally-managed version of this process using optical character recognition (OCR) document processing technology.
- 2.6. When Pocket homes are sold on, the company validates the eligibility of the new purchaser, and contracts cannot be exchanged without the provision of a certificate from Pocket Living.
- 2.7. Pocket purchasers can only sub-let their affordable home in exceptional circumstances, determined by need. There are currently 12 homes sublet out of 718. The reasons for sub-letting include looking after a sick relative and job moves, including overseas. A Pocket home cannot be sublet in the first year or for longer than one year at a time. Any rental must be an Assured Shorthold Tenancy and to an eligible person at a discounted rent of 80%. This is set out in the lease and included in the marketing methods plan agreed with the local authority.

2.8. Pocket Living considers that it is crucial that First Homes include similar features to maintain their integrity, but we are concerned that local authorities do not have sufficient resources to do this important function. Sound management through a qualified administrator should be a critical element of First Homes; without them, the benefits of First Homes will be quickly lost, and the integrity of the policy tarnished. Local authorities could sub-contract the role or the Government could adopt an approach like the one used with Help to Buy with local agents.

### 3. Creating the framework to deliver the homes that first time buyers need and deliver First Homes at scale

#### Level of discount

- 3.1. Based on our experience of over fifteen years of delivering discounted homes for first time buyers and extensive modelling, we consider that the discount should be a minimum of 20% (reflecting the NPPF) and a maximum of 30%, established through the local plan.
- 3.2. In Pocket Living’s experience, a 20% discount helps a significant proportion of first time buyers. In most areas in London, a 20% discount is sufficient to help people on moderate salaries on to the housing ladder. Analysis of the ONS Annual Survey of Hours and Earnings (AHSE) 2019 shows the number of people working in London who are priced into home ownership at different price points/level of discount. Our research shows that a Pocket one bedroom home prices-in nearly double the amount of people compared to the average London house priced at a 30% discount.



- 3.3. There will clearly be a trade-off between the level of discount and number of homes that can be delivered. Pocket Living is already delivering homes at a 20% discount to market and has a pipeline in excess of 1,000 homes. Extensive modelling of the impact of First Homes on our existing portfolio of sites found that a discount of 30% would result in a 60% decrease in affordable homes and a 20% decrease in all homes (in some cases, we deliver market homes where required to do so by planning). Extrapolated over wider delivery, a deeper discount would have a profound impact on the delivery of First Homes.
- 3.4. The additional 10% discount will not materially improve the affordability reach of First Homes; incomes will drop from about £59,000 to £52,000, but the impact on viability is substantial. We therefore suggest that, to support maximum delivery, the discount is a minimum 20% with a maximum of 30%, determined locally and set out in the local plan.

- 3.5. The impact of the discount on viability means that levels need to be considered very carefully if First Homes are to be delivered at scale. This applies to the minimum discount as shown in 3.2 and to the maximum level. There is a risk that without a maximum level of discount, authorities could seek discounts that severely impact viability and create an inequitable market for consumers where first time buyers in one area benefit from a much higher discount than a neighbouring area. This damage to viability would reduce the number of First Homes delivered and undermine the credibility of the programme. In order to buy land, developers need certainty of the maximum discount to be able to factor in all development costs; if the discount is negotiated on a site by site basis, it would be impossible to price in the cost and buy land.
- 3.6. The level of discount will also impact on the displacement of other affordable housing. The impact of this is both directly through the loss of the other affordable homes no longer being subsidised by developers and the loss of shared ownership receipts (initial and from staircasing) from housing associations which are used to cross-subsidise rented delivery. The increase in the Affordable Homes Programme is insufficient to address the gap, which means there will be a reduction of homes for those in the most need, as well as reduced support from many for development proposals.
- 3.7. The level of discount should be a minimum of 20% with a maximum of 30% at a local authority's discretion, set out in the local plan where evidence supports the larger discount. The Government could adopt a similar approach to adoption of national technical standards, ensuring that the discount is justified and the impact is fully tested through the local plan.
- 3.8. It is also key that there are clear boundaries to the discount that lenders have confidence in. Lenders have previously expressed concerns about the distortive effects of deep discounts and the difficulty of administrating variability within a discounted product. A discount range of 20% to 30% would address this.
- 3.9. It should also be borne in mind that the greater the discount, the larger the leap to the next rung of the housing ladder and the risk that people are trapped in First Homes.

## Affordability

- 3.10. For first time buyers, there are other determinants of affordability greater than price/discount: many elements of the mortgage market negatively affect affordability.
- 3.11. For first time buyers, achieving the deposit required is the major barrier, which is why Help to Buy has been so effective. It is welcome that the Government is investigating long-term mortgages, as this could have a very powerful effect in making mortgages more affordable if stress rates, deposit levels and income multiples can be also be reviewed.
- 3.12. For the mainstream mortgage market to reflect the affordability needs of moderate earning first time buyers, 95% mortgages will be required with a loan to income multiple of up to 5.5. Consumers can be protected from this high-income multiple by a 35+ year mortgage term and a 7+ fixed interest period. After this period, income increases, and equity growth should facilitate re-mortgage or the move up the housing ladder.
- 3.13. Pocket Living's research based on current prices in the London market shows that a mortgage product with the above features delivered broadly by lenders would reach very similar levels of affordability in terms of income and deposit levels as a consumer using Help to Buy.

## Mix of homes

- 3.14. The mix of homes sought should be set out in local plan policy and justified on the basis of the need of local first time buyers.
- 3.15. Larger homes require greater subsidy and therefore impact on viability and the delivery of homes. First Homes should be primarily one bedroom homes, with some two bedroom homes, reflecting the demand from first time buyers. The English Household survey records that 67% of first time buyers are single or a couple without children. For larger homes shared ownership would be a more appropriate, affordable and viable option.
- 3.16. The table below shows the amount of subsidy required to deliver different sizes of homes and therefore the impact it would have on viability. This is modelled on a recent Pocket development in outer London. A one bedroom home at a 20% discount requires cross-subsidy of £64,000; this increases to £165,000 for a three bedroom home at a 30% discount:

### Impact of mix on the cost of discount modelled on a recent Pocket development in outer London

	Market value	20% discount	30% discount
<b>One Bedroom</b>			
Value	£322,000	£258,000	£225,000
Difference/cost		£64,000	£97,000
<b>Two Bedroom</b>			
Value	£461,000	£369,000	£323,000
Difference/cost		£92,000	£138,000
<b>Three Bedroom</b>			
Value	£550,000	£440,000	£385,000
Difference/cost		£110,000	£165,000

- 3.17. The level of subsidy required for a three bedroom home will have a critical impact on viability, will reduce ability to deliver First Homes and is not justified by the profile of first time buyers, 70% of whom are single or childless couples.

## 4. Securing a supply of small sites to deliver First Homes

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- 4.1. The time taken to update policy and for that policy to be reflected in decision making means that the planning system will not deliver First Homes quickly enough (section 6). Local plan reviews take about 19 months and are likely to take even longer after the pandemic given the backlog for the Planning Inspectorate. An exception site policy will not deliver First Homes in urban areas as there are so few exception sites and will diminish as brownfield registers are updated.
- 4.2. Reliance on First Homes being delivered through exception sites and S106 agreements on planning permissions could result in very slow delivery at a time when affordability continues to worsen. In 1996, 93% of 25-34 year olds borrowing at 4.5 times salary could afford the cheapest home in their local area. This has fallen to 61% across the country and is down to just 35% in London (Barriers to Home Ownership for young adults, IFS, October 2018). Since 2018, affordability has worsened further: young people can't wait for exception sites and planning permissions to deliver.
- 4.3. The consultation document acknowledges that securing First Homes through planning will be challenging and is likely to take many years. This reflects our experience (section 6). Given the importance of the First Homes policy and the urgent need to deliver affordable homes for first time buyers, it is critical that there is a source of land supply for First Homes.
- 4.4. The consultation document estimates that 4,000 First Homes will be delivered each year through exception sites, although only 1,000 homes are currently delivered this way, and that total includes rural exception sites. Exception sites are very rare in urban areas and will be increasingly so as local authorities update brownfield registers. We therefore consider that the assumption is extremely optimistic and exception sites will not be a source of supply in urban areas generally and in London in particular.

### Delivering First Homes on small sites will deliver faster more homes and more affordable homes

- 4.5. A more appropriate approach in urban areas, reflecting the importance placed on housing delivery in urban areas in Planning for the Future (12 March 2020), would be to target First Home delivery on small sites. This would ensure that First Homes are delivered quickly, would create additionality in housing supply, helping to achieve the ambition of delivering of 300,000 new homes a year. and would support the Government's ambition to diversify the housing industry.
- 4.6. Focusing delivery of First Homes on small sites would:
  - ensure that there is a quicker supply of First Homes
  - create additionality in housing delivery by bringing new sites forward (small sites contribute only about 10% of all new homes in London)
  - create additionality in affordable housing delivery (the vast majority of small sites do not deliver affordable housing)
  - enable large sites to continue delivering the full range of affordable housing (rented and First Homes)

4.7. In section 5, we have set out the challenges of delivering small sites. Small sites are not delivering the number of homes that they could or should and do not deliver much affordable housing. Increasing the delivery of small sites and expediting their delivery could make a real difference to achieving the Government's housing ambitions and would foster a more diverse housing industry by encouraging new SME entrants. This would reverse the damaging decline in small and medium sized developers - from 40% of delivery to just 12% now (HBF: Reversing the decline of small housebuilders: Reinvigorating entrepreneurialism and building more homes, 2017). The number of SME developers has fallen by 80% since 1988 (HBF: Increasing private housing supply, 2015).

## Small sites do not contribute sufficiently to housing delivery and affordable housing delivery

4.8. Analysis of small sites (less than 0.25 hectares, sites delivering 10-200 homes) in London over the last three years found that only a tenth of planning permissions for housing was from small sites. Developments by private developers (rather than councils and housing associations) included an average of only 15% onsite affordable housing. 67% of these small sites did not deliver any affordable housing.

4.9. A quarter of the sites were prior approvals for permitted development, meaning even fewer small sites successfully navigated the planning process. If permitted development sites are removed from the analysis, the average permission still only contained 19% onsite affordable housing and over half of sites consented did not deliver any onsite affordable housing.

## Harnessing the potential of small sites

4.10. Small sites could play an important role in housing and affordable housing delivery. They are delivered quickly in single phases, and unlike large sites, they are not reliant on complex infrastructure requirements nor restricted by local absorption rates. On small sites, developers are incentivised to recoup their investment as quickly as possible.

### 4.11. A policy supporting delivery of First Homes on small sites would:

- Reduce reliance on large, complex sites which require infrastructure investment and are delivered more slowly, as well as on the volume house builders;
- Support small and medium-sized house builders and encourage new entrants to the housing industry – boosting supply;
- Diversify the locations, type and mix of new housing;
- Increase housing provision in accessible and sustainable locations well served by transport;
- Increase affordable housing delivery;
- Reflect the Government's ambitions in Planning for the Future; and
- Support town centres and high streets where first time buyers predominantly want to live.

### 4.12. A supportive planning framework to harness small sites to deliver homes for first time buyers would:

- Amend the NPPF to require local authorities to allocate small sites (less than 0.25 hectares) to deliver First Homes;
- Create a streamlined planning process for small sites delivering more than 40% First Homes, with:
  - a presumption in favour of development
  - freedom over tenure and size mix
  - no viability testing
  - CIL exemption

- Ensure quick delivery with a fast track approach to planning from pre-application to discharge of conditions; eight weeks for planning determination, four weeks for the S106 agreement and six weeks to discharge conditions.

**4.13. Developers should be able to bring forward suitable sites if they are:**

- 0.25 hectares or smaller
- Brownfield sites
- At least 40% First Homes
- Well-served by public transport/local amenities
- Well-designed homes and developments that complement their surrounds
- In an area where there is an identified need for First Homes

**4.14. A presumption in favour of small sites would comprise:**

- The principle of residential development being established
- Local authorities providing design codes to guide development, but applicants being able to propose a different approach with robust justification
- Applications being approved unless it can be robustly demonstrated that the development would result in an unacceptable level of harm that outweighs the benefits of making the best use of small sites, delivering new homes and delivering First Homes.
- The presumption would not apply in conservation areas or in flood zone 3.

## 5. The need for a small site policy to boost delivery

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- 5.1. Delivering small sites can be far more challenging than delivering large developments. Small sites are, by their nature, close to their neighbours and attract significant attention and concern. They are not able to offer the amenities of large sites so will be less likely to attract political support. Even though our developments benefit local first time buyers, meeting identified need, and are beautifully designed to complement the local character, they struggle through planning.
- 5.2. Large sites can offer local communities greater benefits such as community facilities, parks and amenities such as shops and restaurants. They also generate greater revenue from the Community Infrastructure Levy, S106, New Homes Bonus and council tax and are therefore more important to local authorities.
- 5.3. Large sites will get greater political attention and support as they will make a greater contribution to a local authority's objectives such as housing delivery as well as generating funding.
- 5.4. The decimation of small and medium builders (80% since 1988 and from 40% of supply to just 12%) is in part a reflection of the complexity of delivering small sites. The Federation of Master Builders have found (12 March 2020) that 42% of SME house builders reported that the planning process was the single biggest obstacle to them building more homes.
- 5.5. Research from the HBF found that the average permissioned housing developments has increased in size by 17% in less than a decade; the cost and risk of planning is disproportionately high for small sites; it is better to invest in larger sites.
- 5.6. Research by Estates Gazette found that smaller developments in London (between 10 and 25 homes) experience higher rates of refusal than larger developments and that the rate of refusal on smaller developments has risen particularly sharply since 2015 (Estates Gazette, London Residential Refusals on the Rise, 2018).
- 5.7. The average time taken to get planning permission for small sites has increased from 1.1 years to 1.4 years (Lichfields, February 2020). A small site will be delivering new homes while large sites are still in planning, and on average, time taken to get planning is only six months less than construction, although our experience in London is that planning can now take longer than construction.
- 5.8. There is significant potential to deliver new homes on small sites, and quickly, but the complexity, cost and risk in planning puts off small developers and elongates project timescales. Speeding up the delivery on and off small sites will deliver more homes, and quickly.

5.9. The Mayor estimates that in London about a third of housing delivery is from small sites, but half of these homes are conversions or changes of use. In reviewing the London Plan, the Mayor found that the reasons for low housing delivery from small sites tends to be planning rather than economic as a result of restrictive policies such as:

- limiting density of infill development to match that of the surrounding context in respect of building height, building footprint and separation distances;
- requiring development to be in keeping with, and effectively not change, the existing local character in terms of building heights, rooflines, densities or residential typologies; and
- inflexible approaches to the provision of, or loss of, private amenity space; and minimum privacy distances between windows, irrespective of the placement of windows or landscape screening.

This reflects Pocket Living's experience.

5.10. Small sites struggle more to meet planning policy. The breadth and depth of Local Plans and planning policies means that it is not possible for applications to fully accord with planning policy. In London, there are two sets of policies to manage in the borough's local plan and London Plan. Planning authorities tend to prioritise policies according to the nature and location of an application and political priorities.

5.11. All planning decisions balance the benefits of a proposed development with divergence from policy. This is known as the planning balance and is an important part of committee reports. Inspectors undertake a similar balancing exercise when deciding appeals, ascribing weight to different factors. In reaching decisions, planning authorities will exercise judgement and weigh any failure to meet policies with the overall benefit of the application. This is why even in a plan-led system, planning decisions are discretionary and are only as effective as those exercising discretion.

5.12. The objective nature and breadth of planning policies means that most applications of all sizes will fail to meet several of them. This means that applications can be refused on a number of grounds adding risk and complexity,

5.13. With small sites it is inevitable that it is even harder to meet all policies. The constrained nature of sites and scale of development means that it is not possible to provide a full mix of housing types and tenures, policy compliant levels of open space and play space and urban greening. Many authorities also have policies on orientation, homes per core (in flatted developments) and separation distances that are often challenging to meet. All planning decisions are trade-offs. Whilst larger sites will also fail to meet all policies, the benefits will be greater, including on the authority's targets and finances. It is therefore easier to weigh the balance for larger sites, and there is more political will to do so.

5.14. In the same way that small sites are challenging, so is innovation in development. Pocket Living has developed a model to deliver grant-free affordable homes that cost 20% less than market homes. We achieve this in a number of ways:

- Critically all, or most, of our homes are compact one bedroom one person homes, meeting the needs of young first time buyers. 90% of our purchasers are single. This enables us to develop at higher densities than developments with a mix of housing types. It also supports modular construction through having a standard typology. Modular construction saves about a third on construction times, reducing interest payments and the time to get a return on capital and delivering a high quality, sustainable, precision manufactured home.

- All our homes are the same tenure: intermediate affordable housing. Our business was established to help first time buyers onto the housing ladder through discounted homes to purchase. Adding other tenures adds complexity. We have delivered some market homes where requested to do so by local authorities, and in one development, we are partnering with a housing association and are also delivering shared ownership homes. Adding other affordable tenures would require separate cores to support management and would reduce the number of homes that can be delivered.
- We provide communal amenity space with courtyards, roof terraces and amenity rooms. This fosters a sense of community, which is important to our residents. We do not provide individual balconies, as required in planning policy, as they add considerable cost, and communal space reflects the ethos of the developments.
- We do not provide parking, as this enables us to use the sites efficiently. Our purchasers do not own cars, and we develop in sustainable locations well served by public transport.

5.15. Our developments are not able to accord with all planning policies, particularly on tenure, mix and parking, but are 100% low cost home ownership and meet a clear, evidenced local need. Before buying land, we will meet local authorities to explain our model and ascertain whether a Pocket development would be acceptable. We are clear about the nature of our developments and the policies we will not be able to meet. The typical challenges we face are the time taken to secure meetings (three months for a pre-application meeting in a recent instance despite agreeing a planning performance agreement), delayed responses to statutory consultation deadlines, which in turn delay determination of the application and hence development, and missing planning committees due to officer error.

5.16. Small sites are currently complex to develop but can offer a fast and significant additional supply of new homes with the right policy support and planning process improvements. This would benefit the delivery of housing (attaining the 300,000 target) and delivery of First Homes and would foster a more diverse housing industry by bringing in new players, reversing the decline of small house builders.

## 6. The challenges of delivering First Homes through planning

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- 6.1. The consultation document suggests securing First Homes through planning changes, with the option of legislation if this does not yield the desired results. We believe that an alternative source of supply of First Homes is needed to complement planning to ensure that First Homes are delivered quickly and at scale.
- 6.2. The planning route will take years to embed as local plans are updated to reflect new NPPF policy. Even with legislative changes requiring a proportion of First Homes in planning permissions, there is a risk that authorities could resist applications on other grounds if they are not supportive of First Homes. Many authorities support housing development as it delivers the affordable homes that they wish to secure; without this there may be less support.
- 6.3. Relying on changes to the NPPF will not deliver First Homes quickly, as many authorities will resist applications where provision of First Homes means local needs are not being met. As the NPPF is only a material consideration, local authority policies will take precedence in decision making. It will take years for the policy to be reflected in local plans as they are updated. The larger the displacement of other affordable housing, the greater the resistance. Developers are likely to be reluctant to appeal an application to secure First Homes as appeals are risky, expensive and time consuming.
- 6.4. Planning law requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise. The development plan is the Local Plan and in London includes the London Plan. The NPPF is a material consideration.
- 6.5. When formulating affordable housing policy, local authorities undertake Strategic Housing Market Assessments that assess need for different types of affordable housing. This is then manifested in policy on the proportion of affordable homes required in planning applications and the split between intermediate and rented. In London, the typical split of social and intermediate homes is 60/40 or 70/30.
- 6.6. The level of affordable housing provided through applications is often determined through a viability assessment to establish the maximum reasonable provision. The level of contribution will be a factor of the tenure, mix and affordability (larger and cheaper homes requiring greater cross-subsidy). The level of cross-subsidy required by First Homes will affect how much other affordable housing is provided. This will increase with the size of homes and the level of discount (see table on page 11).
- 6.7. Local authorities consider planning applications against their adopted policies and other material considerations, such as the NPPF. The local political priority is to meet local housing need. Applications that do not meet local need are likely to be resisted. Local authorities could use this to argue against First Homes, which could undermine affordable housing delivery and risk the ability to achieve the 300,000 home target.
- 6.8. A First Homes policy that pre-empts local need could result in refusals of applications or requirements for greater provision of affordable housing that delivers First Homes and the local authority's priorities. This could impact on viability and the ability to deliver development.

- 6.9. Once the NPPF is updated, it will take many years for the First Homes policy to be reflected in local plans. It will only be reflected as plans are updated and a local plan review takes years, an average 19 months.
- 6.10. Whilst the NPPF policy would be a material consideration in a planning appeal, this is a risky, expensive and unattractive route for most developers. Few applications meet all planning policies, boroughs carefully 'weigh the planning balance.' If authorities refuse applications because they will not wish to prioritise First Homes in their borough, they will do so on several grounds.
- 6.11. A small sites policy would expedite delivery of First Homes and complement delivery through planning, given the time and challenges that entails.
- 6.12. It is also important to understand the extent to which areas outside the London and the South East deliver affordable housing through S106 and therefore the potential to deliver First Homes. Research for MHCLG estimates that the value of planning obligations and CIL levied in 2016/17 was £6 billion (The Incidence, Value and Delivery of Planning Obligations and Community Infrastructure Levy in England in 2016-17, 2018). 68% of the value of agreed developer obligations was for the provision of affordable housing, at £4.0 billion. The geographic distribution of planning obligations and CIL is weighted heavily towards the south of England.
- 6.13. London and the South East accounts for:
- 58% of the total value of S106 and CIL contributions
  - Over half of the value of in-kind affordable housing developer contributions: at £2 billion
- 6.14. London accounts for almost a fifth of all affordable homes delivered through S106. The North East, North West and Yorkshire and Humberside account for 9% of affordable housing.

**Table 3.2 The value of planning obligations by regions**

	Total value of in-kind affordable housing		Total value of (non-in kind affordable housing) planning obligations and CIL		Total value of planning obligations (including affordable housing) and CIL	
	Value (£million)	%	Value (£million)	%	Value (£million)	%
East	£513.9	13%	£324.0	16%	£837.9	14%
East Midlands	£232.4	6%	£35.7	2%	£268.1	4%
London	£1,211.6	31%	£1,083.8	54%	£2,295.4	38%
North East	£77.5	2%	£28.1	1%	£105.6	2%
North West	£156.5	4%	£26.3	1%	£182.8	3%
South East	£876.3	22%	£314.0	16%	£1,190.3	20%
South West	£449.7	11%	£114.2	6%	£563.9	9%
West Midlands	£283.4	7%	£42.8	2%	£326.2	5%
Yorkshire & Humber	£170.4	4%	£67.1	3%	£237.5	4%
<b>TOTAL</b>	<b>£3,971.7*</b>	<b>100%</b>	<b>£2,036.1</b>	<b>100%</b>	<b>£6,007.4</b>	<b>100%</b>

\*This aggregate total does not include affordable housing commuted sum (direct payment) in lieu of in-kind provisions, which amounts to £75.4 million nationally. This value is included in the *Total value of (non-in kind affordable housing) planning obligations and CIL*

Table 3.7 The value of in-kind developer contributions towards affordable housing 2016/17 by region (£ million)

	Social Rent	Affordable Rent	Intermediate Rent	Affordable Home Ownership	Starter Homes	Unknown	Total
East Midlands	£38.6m	£91.5m	£13.0m	£33.5m	£0.9m	£54.9m	£232.4m
East of England	£82.3m	£272.8m	£1.2m	£98.7m	£0.9m	£58.1m	£513.9m
London	£441.4m	£408.4m	£80.6m	£217.6m	£2.9m	£60.7m	£1,211.6m
North East	£10.4m	£41.1m	£0.8m	£17.5m	£ -	£7.5m	£77.5m
North West	£16.0m	£50.2m	£2.0m	£29.9m	£3.1m	£55.2m	£156.5m
South East	£144.4m	£436.5m	£7.0m	£230.6m	£5.5m	£52.4m	£876.3m
South West	£111.8m	£198.9m	£4.8m	£123.7m	£0.4m	£10.0m	£449.7m
West Midlands	£105.1m	£81.1m	£4.0m	£42.4m	£ -	£50.8m	£283.4m
Yorks. & Humber	£48.5m	£53.3m	£39.4m	£16.3m	£0.1m	£12.8m	£170.4m
<b>Total</b>	<b>£998.5m</b>	<b>£1,633.9m</b>	<b>£152.9m</b>	<b>£810.3m</b>	<b>£13.7m</b>	<b>£362.3m</b>	<b>£3,971.7m</b> *

Source: Local Authority Housing Statistics and Nationwide Building Society

\*This does not include the affordable housing direct payment commuted sum, at a total value of £75.4m.

- 6.15. The legislative route would have more bite but would take time to implement. Even when in force, authorities might refuse applications on other grounds.
- 6.16. Fundamentally, the challenges posed by securing First Homes through the planning system mean that to get fast delivery of First Homes, an alternative channel is needed and that should be small sites to create additionality in housing and affordable housing delivery.

## 7. Consultation questions

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Q1.

a) Do you agree with a minimum discount of 30% (but with local flexibility to set a higher one)?

First Homes should be targeted at those who most need them. The greater the discount, the larger the requirement for cross subsidy and the impact on viability and the ability to deliver other affordable homes. Pocket Living has demonstrated in the past fifteen years that we have supported a range of first time buyers across London with a 20% discount.

We are concerned that if there is no restriction on the maximum discounts, this will create inequity; why should a purchaser in one borough benefit from a 50% discount when one in another borough only gets 20%? Deep discounts will also impact on viability and the ability to deliver First Homes and other affordable homes. Without certainty of the level of discount, it will not be possible to buy land as costs will not be known.

b) If not, what should the minimum discount be?

**i. 20%** Our experience shows that the NPPF 20% discount is sufficient to help many first time buyers. A significant number of people working in London are priced into home ownership with a 20% discount. This should be a fixed discount across all First Homes.

The level of deposit has the biggest impact on affordability for purchasers, which is why Help to Buy has been so successful for first time buyers. The Government's commitment to long term mortgages will be highly effective in helping people into home ownership.

The cost of First Homes for development is not just the number of homes to be delivered but also the mix and level of discount. To provide certainty for developers to buy land, the level of discount and mix of homes should be established, and tested, through the local plan.

There should be a maximum discount of 30%, established through the local plan, based on evidence. Where local authorities propose discounts greater than the minimum, this should be supported by evidence of need and impact on viability and tested at examination, as is the case with the adoption of national technical standards.

Q2.

a) Should we set a single, nationally-defined price cap rather than centrally dictate local/regional price caps?

A price cap is important to ensure that help is targeted on those who most need it. The price cap should be nationally defined and regional, as with Help to Buy, reflecting the regional variations in house prices.

b) If yes, what is the appropriate level to set this price cap?

i. £600,000 in London

£600,000 reflects the cap for Help to Buy in London and reflects higher values in the capital.

Q3.

a) If you disagree with a national price cap, should central government set price caps that vary by region instead?

Yes. As with Help to Buy, the Government should set a different price cap for London.

b) If price caps should be set by the Government, what is the best approach to these regional caps?

i. London and nationwide which reflects the approach taken with Help to Buy.

Q4.

Do you agree that, within any central price caps, local authorities should be able to impose their own caps to reflect their local housing market?

The price cap should be set by government. If local authorities set different caps, it could create undue complexity. To be equitable for first time buyers, there needs to be reasonable consistency between authority areas.

Q5.

Do you agree that local authorities are best placed to decide upon the detail of local connection restrictions on First Homes?

Local connection restrictions should be, for all local authorities, people who live or work in the local authority. It would be inequitable to first time buyers if in some areas workers were to be excluded or if there were to be significant variations in the length of connection. It is reasonable that this is set nationally to create a consistent and equitable policy.

**Q6.**

**When should local connection restrictions fall away if a buyer for a First Home cannot be found?**

**ii. 3 - 6 months**

It is important to balance ensuring First Homes help local people with the ability to market to a wider pool if there is not sufficient demand. We would suggest that three to six months is a reasonable period within which to find local buyers, after which the homes can be offered more widely.

**Q7.**

**In which circumstances should the first time buyer prioritisation be waived?**

We do not think that the first time buyers' priority should be waived. The First Homes policy is a significant intervention in planning that will replace affordable rented homes with homes for first time buyers. The purpose of the policy is to help people onto the housing ladder, so the homes should only be available for first time buyers. If it is found that there is an over-supply or homes are unable to be sold to first time buyers, the policy should be reviewed.

**Q8.**

**a) Should there be a national income cap for purchasers of First Homes?**

As with shared ownership, there should be a regional income cap reflecting regional variations in house prices.

**b) If yes, at what level should the cap be set?**

£90,000 in London, as with shared ownership.

**c) Do you agree that Local Authorities should have the ability to consider people's income and assets when needed to target First Homes?**

It would get extremely complicated to assess assets and could lead to unintended consequences. Only income should be taken into account, but purchasers should be required to have a mortgage and not be cash buyers.

**Q9:**

**Are there any other eligibility restrictions which should apply to the First Homes scheme?**

To ensure that First Homes are targeted at those that really need help, First Homes purchasers should not be cash buyers and should be required to have a mortgage of at least 25%.

**Q10.**

**a) Are local authorities best placed to oversee that discounts on First Homes are offered in perpetuity? b) If no, why?**

Managing the discount is fundamental to managing the integrity of the First Homes and ensuring a stock of discounted homes for first time buyers is established.

It is important to manage the resales to ensure that they are to eligible purchasers and at the correct discount.

We do not consider that local authorities have the resource to do this. The burden will increase as more First Homes are delivered and there are onward sales. An administrator, responsible to the local authority, is required to maintain the integrity of the homes, including ensuring that the right people are living in them. The administrator's role should be to:

- Ensure that prospective purchasers are eligible
- Ensure that the home is appropriately discounted through a Red Book valuation
- Ensure that the purchaser remains resident in the property
- Manage the sub-letting process to ensure it is required and is at a discount and to an eligible renter
- Ensure a future purchaser is eligible and the home is appropriately discounted

**Q11.**

**How can First Homes and oversight of restrictive covenants be managed as part of Local Authorities' existing affordable homes administration service?**

Local authorities are extremely stretched, and this would be an additional burden. Without proper administration the homes will be lost to the open market. Local authorities should outsource administration.

**Q12.**

**How could costs to local authorities be minimised?**

Purchasers can be charged reasonable fees to manage sub-letting and resales.

**Q13.**

**Do you agree that we should develop a standardised First Homes model with local discretion in appropriate areas to support mortgage lending?**

A standardised First Homes model would help mortgage lenders but should not preclude other forms of discounted market sale homes where there is demand.

Given the scale of delivery anticipated, it is important to ensure that there will be sufficient lending to support the purchase of the new homes.

**Q14.**

**Do you agree that it is appropriate to include a mortgage protection clause to provide additional assurance to lenders?**

Yes. If a lender has to take possession, the former restrictions should apply on future resales of the property.

Q15.

For how long should people be able to move out of their First Home and let it out (so it is not their main or only residence) without seeking permission from the local authority?

vi. Other (please specify)

Sub-letting should only be allowed in exceptional circumstances, with explicit permission and at a reduced rent. Without this safeguard, the First Homes will become buy to let properties.

The purpose of the First Homes policy is to help people onto the housing ladder. The homes are to be purchasers' residences. There may be circumstances where a purchaser needs to move for work, financial reasons or to help a sick family member. In these instances, it is reasonable that the home is sub-let, but only for a limited time (12 months maximum at one time, and no more than 12 months in three years), which is what is allowed with Pocket homes.

Q16.

Under what circumstances should households be able to move out of their First Home and let it for a longer time period? (Tick all that apply)

vii. Other (please specify)

There should only be limited sub-letting in exceptional circumstances, up to 12 months at one time and no more than 12 months in three years. First Homes are for first time buyers to live in, not sub-let.

Q17.

Do you agree that serving members and recent veterans of the Armed Forces should be able to purchase a First Home in the location of their choice without having to meet local connections criteria?

Yes.

Q18.

What is the appropriate length of time after leaving the Armed Forces for which veterans should be eligible for this exemption?

i. One year

Q19.

Are there any other ways we can support members of the Armed Forces and recent veterans in their ability to benefit from the First Homes scheme?

No comment.

## Q20.

### Which mechanism is most appropriate to deliver First Homes?

#### ii. Primary legislation supported by planning policy changes

We have set out in section 6 our thoughts on the challenges of the delivery of First Homes. Securing First Homes through planning will not be quick and will be subject to the vagaries of local politics and decision making.

If the policy is introduced through the NPPF, it could be years before the First Homes are delivered. The NPPF is a material consideration and many authorities could choose to prioritise local policy and local needs based on their local needs assessment. If the Government wants to see delivery of First Homes, planning policy and exception sites alone will not be sufficient. We suggest:

- Large sites provide the full mix of affordable housing
- A small sites policy in the NPPF requires authorities to allocate small sites (less than 0.25 hectares) for First Homes and with a simpler, faster planning regime for such sites:
  - A presumption in favour of development, freedom over tenure and mix requirements, and no viability testing
  - Fast track approach to planning from pre-application to discharge of conditions
  - CIL exemption
- Enable developers to suggest suitable sites as long as they are:
  - Less than 0.25 hectares
  - At least 40% First Homes
  - Well-served by public transport/local amenities
  - In an area where there is an identified need for First Homes
- Require local authorities to report each year on how many First Homes have been allocated, permitted and delivered and make delivery part of the Housing Delivery Test

## Q21.

### Which do you think is the most appropriate way to deliver First Homes?

#### ii. As a percentage of all units delivered on suitable sites

Q22.

What is the appropriate level of ambition for First Home delivery?

iv. Other (please specify)

We welcome and support the Government's ambitions to deliver affordable homes for first time buyers. Requiring First Homes through S106 will displace other forms of affordable housing delivery. An appropriate balance is needed to ensure that development is viable and deliverable and that other types of affordable housing can be delivered for those in need.

The cost of delivering First Homes is not just a factor of how many are sought, but also the level of discount and mix of homes (the cost of the discount being greater for larger homes). To provide certainty to developers so they know the cost of development and how much they can pay for land, it is fundamental that the level of discount (between a minimum 20% and maximum 30%) and mix must be established in local plan policy, rather than a site by site basis.

The proposed approach of driving First Homes delivery through unlocking small sites will ensure that the needs of first time buyers are met, those with other housing needs are still helped and overall housing delivery increases. This would support a lower requirement of First Homes through S106 and enable other affordable homes to continue to be delivered.

Q23.

Do you agree with these proposals to amend the entry-level exception site policy to a more focused and ambitious First Homes exception site policy?

As highlighted in section 4, we do not think that exception sites will yield significant delivery, especially in urban areas, which are a focus of the Planning for the Future paper.

A more effective approach would be to promote small sites for First Home delivery. This would support delivery of small sites, attract new players into the market and create additionality in delivery – helping to achieve delivery of 300,000 new homes a year.

Q24.

a) Do you think there are rare circumstances where local authorities should have the flexibility to pursue other forms of affordable housing on entry-level exception sites, because otherwise the site would be unviable?

b) If yes, what would be an appropriate approach for local authorities to demonstrate the need for flexibility to allow other forms of affordable housing on a specific entry-level exception site?

No comment – our view is that small sites should be an important source of delivery of First Homes.

**Q25.**

What more could the Government do to encourage the use of the existing rural exception site policy?

No comment

**Q26.**

What further steps could the Government take to boost First Home delivery?

As outlined in section 4, the most effective way to drive delivery of First Homes would be through unlocking small sites.

**Q27.**

Do you agree that the proposal to exempt First Homes from the Community Infrastructure Levy would increase the delivery of these homes?

Yes. Our experience is that the cost of CIL is significant, and the uncertainty over whether authorities offer relief for discount market sale homes adds significant development risk. It is appropriate that all discount market sale homes, including First Homes, are exempt from CIL in the same way as other affordable housing, including shared ownership.

**Q28.**

Do you think the Government should take steps to prevent Community Infrastructure Levy rates being set at a level which would reduce the level of affordable housing delivered through section 106 obligations?

An approach to First Homes that harnesses the potential of small sites will reduce the requirement to displace all other affordable housing and should reduce the risk of authorities increasing CIL rates.

**Q29.**

a) What equality impacts do you think the First Homes scheme will have on protected groups?

b) What steps can the Government take through other programmes to minimise the impact on protected groups?

No comment.

**Q30.**

Do you have any other comments on the First Homes scheme?

See sections 1-6



Nathan  
Varcoe Road SE16  
Teacher



Thomas  
Oak Grove NW2  
Civil Servant



Pippa  
Mountearl Gardens SW16  
NHS Practitioner



living

Tower House  
10 Southampton  
Street  
London  
WC2E 7HA

[www.pocketliving.com](http://www.pocketliving.com)  
020 7291 3680