

## **Inspector's Question 29**

(For the answers to parts i. iii. and iv. of the Inspector's question 29 reference should be made to the submissions by Opinion Research Services (ORS).)

**Q29 ii)** Whether it is justified for VALP to make provision for a defined quantity of housing demand displaced from Wycombe, Chiltern and South Bucks in advance of adopted Local Plans for those areas defining the quantity of unmet need to make no provision for unmet need displaced from Luton when there is an adopted plan for that area which defines the quantity of displacement which Aylesbury Vale is likely to experience.

### **AVDC Response**

As set out in the report considering the definition of the HMA the closest relationship was determined to be with the other Bucks council and not as had historically been the case with Milton Keynes. This led to the definition of the best fit HMA to overcome the impracticality of the VALP attempting to deal with three housing market areas and address the unmet need arising in adjacent council areas. No evidence of unmet need has been put forward by Milton Keynes or either of the adjacent Oxfordshire councils so consideration of their unmet need does not arise. However the other Bucks councils were able to justify their need for unmet need to be accommodated within Aylesbury Vale on the basis of detailed cooperative work between the councils. Given that Aylesbury Vale had sufficient capacity to accommodate the unmet need within the best fit HMA it was accepted by AVDC that it would be reasonable and sustainable to do so.

An important aspect of the best fit approach to the HMA is that it is accepted by the adjacent councils that the need arising from their HMAs within Aylesbury Vale is being met by the Bucks best fit HMA's housing requirement. This is a feature of the signed MoUs.

In relation to Luton it has a highly constraining boundary and a key issue that it needed to address in its local plan was where its unmet need could be located. This led to a broad agreement about the likely levels of need that would need to be met in the various parts of the Luton HMA which is the source of the 400 dwellings referred to in the Inspector's question. As stated above the delivery of this housing is subsumed into the overall best fit HMA housing figures for the Bucks councils including the very limited area of the Luton HMA which projects into Aylesbury Vale. There is therefore no need to make a specific provision to meet this need in the VALP.

Nevertheless the only significant settlement within Aylesbury Vale within the Luton HMA is the village of Edlesborough. As set out in the positively prepared soundness

test unmet requirements from neighbouring authorities should be met where it is reasonable to do so and is consistent with achieving sustainable development. The Edlesborough Neighbourhood Plan allocates land for housing which together with commitments will deliver 176 dwellings as recognized in Table 2 of VALP. It is considered that this level of housing is reasonable and sustainable in terms of meeting the broad indication of housing delivery that is indicated for this part of the Luton HMA and as such Aylesbury Vale is playing its part as far as possible in meeting the Luton HMA's needs. Further provision within the part of the Luton HMA that extends into Aylesbury Vale, apart from small windfall developments, would not be reasonable or sustainable given the isolated nature of Edlesborough close to the Chilterns AONB with its poor connections to Dunstable.

### **Q29 v) Likely delivery rates and concentration on large allocations around Aylesbury**

Aylesbury is identified in evidence as the most sustainable settlement in the District. The Settlement Hierarchy document (CD/MIS/003) assessed settlements against the following criteria: size, connectivity, employment provision, facilities and services. As Aylesbury has by far the highest population of any settlement in the District, combined with the provision of significant employment and transport, the provision of a great number of services and facilities, it is identified as being a 'sub-regional strategic settlement'. As such it is the focus of a large percentage of the District's committed and proposed growth.

The suitability and capacity of individual sites were assessed as part of the Housing and Economic Land Availability Assessment (HELAA) (CD/HOU/007) process. Suitable sites in the HELAA can be regarded as developable in accord with the definition set out in footnote 12 of the NPPF. The Sustainability Appraisal main report (CD/SUB/004) then looked at site options in detail, particularly in section 6.5, and the SA Technical Annex (CD/SUB/005) supplements this analysis regarding site options and settlement options. Paragraphs 6.5.5 – 6.5.13 of the main SA report set out specific information relating to the options in relation to Aylesbury and concludes that any option of low growth at Aylesbury would be unreasonable. The SA summarises the Council's reasons for selecting the preferred approach:

Aylesbury - Aylesbury is a large market town and has a significantly higher population than the other settlements within the district, with a population of 71,500 within the urban area and also a substantially higher level of facilities. As such, Aylesbury is recognised in the Settlement Hierarchy (2017) as being the primary settlement in the district – a 'sub-regional strategic settlement' and is a highly sustainable location for growth. Aylesbury is therefore the focus of the majority of the district's housing growth. Aylesbury also has garden town status based on it delivering a significant growth, consistent with the garden town bid document of 2016. All the possible growth that can be allocated at

Aylesbury is therefore considered a constant and is included in all the options including Option 3.

The vast majority of sites at Aylesbury either have planning permission or are approved subject to section 106 agreements. A number of them are already building out such as at Berryfields to the north and other large sites have commenced delivery such as at Kingsbrook to the south of Berton. Significantly higher than normal delivery rates have been achieved at Berryfields with 450 dwellings delivered in 2014/15 and a total of 1,376 between 2013 and 2017 at an average of 344 dwellings per annum.

Also as set out in paragraph 4.8 of the Housing Delivery Study for Buckinghamshire (Wessex Economics, August 2017) CD/HOU/009 "Figure 9 shows that Aylesbury Vale has the highest ratio of housing delivery to existing housing stock of any other authority in Cambridge-Milton Keynes-Oxford Corridor, (and probably in England) based on analysis of housing delivery over the 5 year period 2011/12 to 2015/16, using the DCLG data set on net additions to housing stock". The study goes on to state in paragraph "despite a smaller population and employment base, Aylesbury Vale is delivering at the same rate as Milton Keynes, without there being an identifiable special set of circumstances, and without an up to-date Local Plan. Therefore attaining current levels of delivery should be sustainable, and in the context of the national priority for delivery of new homes, it should be possible to deliver at a higher rate than achieved in the first four years of the Local Plan". Expectations of continued high delivery rates are therefore supported by the study.

More information about this is set out in the VALP Housing Land Supply Soundness document (December 2017) (CD/HOU/010 ). This sets out the housing trajectory and housing land supply position based on the housing requirement and allocations within the Proposed Submission VALP. It contains phasing information for each of the committed sites and proposed allocations and concludes that a 5.3 year housing land supply can be demonstrated at the point of adoption (for the period 1 April 2018 – 31 March 2023). All sites have been individually assessed to determine likely build out rates with promoters/landowners of the site allocations having been contacted. Past delivery rates at Aylesbury, combined with the high levels of existing commitments underpin the delivery expectations of these sites.

In addition the council is preparing Site Delivery Statements for sites around Aylesbury with the assistance of site promoters to confirm the deliverability and capacity of the allocated sites. The council is aiming to agree these in the near future as resources permit but work is well advanced and draft agreements exist for the allocated sites around Aylesbury with agreement being sought with the interested parties on final versions.

The council has also prepared a detailed Infrastructure Delivery Plan CD/INF/001 that sets out the infrastructure required for the allocated sites around Aylesbury so that there is certainty regarding the delivery of necessary infrastructure. With the assistance of the County Council the council is also seeking government funding to support the delivery of infrastructure. Funding has already been secured in relation to the delivery of part of the road network through the Woodlands site and a wider funding bid is being considered in detail by the Government. Lastly Aylesbury has been designated as a Garden Town and is receiving government support to ensure that the Garden Town delivers development in the format expected for a Garden Town.

Given this context the council is confident that expected delivery rates for Aylesbury are feasible.

#### **Q29 vi) Justification of the strategy of allocations to smaller settlement by capacity**

The Settlement Hierarchy document (CD/MIS/003) assessed settlements in the District against the following criteria: size, connectivity, employment provision, facilities and services. This placed settlements into a category of either strategic settlements, larger, medium and smaller villages or other settlement. VALP is based on the overall principle of allocating growth in the most sustainable locations, and therefore allocates sites in strategic settlements, larger and medium villages and makes provision for limited housing growth in smaller settlements.

Initially the council attempted to determine overall percentage targets for smaller settlements in the draft but it was considered by respondents that this was mechanistic approach that did not reflect the identified capacity in smaller settlements or their constraints. Indeed the proposed housing levels exceeded the identified capacity in a number of settlements meaning that extra capacity needed to be realised. Attempts to identify this extra capacity did not however realise additional capacity so the council turned to a capacity based approach that reflected the availability of sites and constraints.

Individual sites were assessed as part of the Housing and Economic Land Availability Assessment (HELAA) (CD/HOU/007) process to ensure that sites were developable. Further detailed work was then undertaken prior to the allocation of sites in VALP to ensure that sites were being considered realistically. The Sustainability Appraisal main report (CD/SUB/004) then looked at site options in detail, particularly in section 6.5, and the SA Technical Annex (CD/SUB/005) supplements this analysis regarding site options and settlement options. Paragraph 9.2.4 reviews the distribution of development across settlements in Aylesbury Vale as set out in the proposed submission VALP. The strategy and policies of the VALP,

including the distribution of development, is then considered against a range of sustainability matters such as biodiversity. Within that assessment it is noted at 10.5.9 that “The focus of growth at strategic settlements has increased since the Draft VALP (2016) stage, with the corollary that the focus of growth at non-strategic settlements has decreased”. In relation to housing, including the distribution of housing, the SA concludes at 10.8.13 that “significant positive effects are predicted”. Overall the SA concludes at 10.14.1 that “The appraisal finds the Proposed Submission VALP to perform well in terms of a number of sustainability objectives, with ‘significant positive effects’ predicted in terms of Communities, Economy, Housing and Transport” with the main negative effect being loss of BMV agricultural land. The distribution of development in the VALP, including the level of growth in rural areas, is therefore regarded as being broadly sustainable.

The council considers that, in combination with the answer to Inspector’s Question 1, the distribution of development across smaller rural settlements is justified and sustainable in many cases reflecting the level of development that the communities themselves have committed to through their neighbourhood plans

**Q29 vii) Should the requirement for affordable housing be varied between different parts of Aylesbury Vale**

There is no evidential basis for varying the requirement for affordable housing between different parts of the District. Around two thirds of the population of Aylesbury Vale is within the Central Buckinghamshire Housing Market Area (Housing Market Areas and Functional Economic Market Areas in Buckinghamshire and the Surrounding Areas) (CD/HOU/001) and as such Aylesbury Vale operates as a largely single market area where there is no significant variation in prices or incomes. It is considered that affordability is broadly comparable across all of the district meaning that a variation on an areas basis is not justified. The Buckinghamshire Housing and Economic Development Needs Assessment (CD/HOU/004) contains no suggestion that the affordable housing should be varied across different parts of the District.

**Q29 viii) Whether policy H6 requirements for special needs housing take adequate account of the critical mass required for such provision**

It is considered that this aspect of the Inspector’s question has been addressed in the council’s answer to Inspector’s questions 41 and 82

**Inspector’s Question 51**

(For matters related to question 29 answered by Opinion Research Services (ORS) reference should be made to their separate submissions)

## **ix) Supply of sufficient deliverable sites to provide five years' worth of housing**

As set out in paragraphs 3.78 – 3.80 of the Submission VALP, the allocations in the Plan (along with existing commitments) will ensure that the Council will meet the overall housing requirements and maintain a five year housing land supply. This is further detailed in CD/HOU/010 – VALP Housing Land Supply Soundness document (December 2017). This sets out the housing trajectory and housing land supply position based on the housing requirement and allocations within the Proposed Submission VALP. It shows that a 5.3 year housing land supply can be demonstrated at the point of adoption (for the period 1 April 2018 – 31 March 2023). All sites have been individually assessed to determine likely build out rates with promoters/landowners of the site allocations having been contacted. A 10% deduction has been applied to all proposed allocations to take into account the risk of unexpected delays. NB a revised version of the soundness document is submitted alongside this answer.

**Q51 x)** Whether it is justified to pray in aid the potential effects of the Oxford-Cambridge expressway for retaining a greater quantity of employment land than economic forecasts suggest is necessary, whilst not identifying a greater quantity of housing allocations to meet the housing demand expected to result from the Oxford-Cambridge expressway.

### **AVDC Response**

There is a fundamental difference in relation to employment and housing sites referred to in this question. The housing sites which may need to be allocated are not identified yet whereas the employment over supply referred to is already in existence and mostly consists of committed and permitted sites. Were the council to seek to reduce this oversupply of employment land it would face the prospect of then trying to identify new employment sites to replace those that it had just disposed of. On a practical basis it seems to the council that disposing of a ready supply of development land which may be needed to meet a future strategy in an early local plan review would not be a sensible approach. The sensible approach would rather to be to reconsider the overprovision once the essential elements of the context for the local plan review, like the location of the expressway and the implications of the new OAN calculation method, are defined in more detail.

There is also the fact that the forecast employment requirement is not matching the activity on the ground in the employment development market. The forecast predicts growth in office development and contraction of traditional B2 employment when it appears the opposite is happening. As well as this there is the need for employment development to meet the implications of the 8,000 dwellings unmet housing need requirement which does not form part of the forecast. Combined with the lack of

confidence in the economic forecast it is considered that these factors justify the precautionary approach taken to employment land in the VALP.

The situation for housing is very different. The reservoir of permitted and committed housing sites does not meet projected need so further sites need to be allocated. However whatever housing allocations need to be made to support growth in the corridor engendered by the Expressway do not have any factual basis as yet so there is no factual basis for further housing allocations. Without a location for the Expressway and whatever other transport improvements may arrive with it is also impossible to formulate a spatial strategy for the distribution of any new housing. There is therefore no justification for including allocations to address the impact of the Expressway in this local plan. However these are matters which will be addressed in the early review of the local plan when further detail on the future transport context, any cooperative working with adjacent councils and the implications of the new OAN calculation method will then play a part.

It is therefore a more complicated situation than would be considered if the discussion was focused down on more employment should mean more housing. Instead the benefit of having capacity for more employment development to match potential future housing growth should be regarded as a positive benefit for the local plan review. In that review a more considered approach can be taken when the employment market may have evolved along the lines suggested by the forecast within the HEDNA or it may have evolved differently as suggested by the current market situation. Essentially the Expressway is not the justification for over supply of employment land but is the potential beneficiary of reservoir of available employment sites which will need to be refined in the local plan review.