

Inspector's Question 79

My Q29(vii) has already raised the issue of the percentage of affordable housing to be required. In addition to the representations listed in that Q and in my subsequent Q51, the following representations also touch on the question of the percentage of affordable housing and other aspects of policy H1 so I would like them to be added to the list of representations on which I would welcome the Council's observations in response to my Q29(vii);

251 and 402	Alison Watt
555 and 720	Graham Tyack of Haddenham Village Society
160	David Saunders
576	Andrew Docherty
694	Alan Sherwell
698	Suzanne Lindsey of Whaddon Parish Council
861 and 864	Jon Hobbs of Vale of Aylesbury Housing Trust
941	Dr Lucy Murfitt of Chiltern AONB Conservation Board
1057	J Richards of Dandara Ltd
1118	Nona Jones of Planning Potential on behalf of Kier Property
1432	Dr Sean Carolan of Winslow Town Council
1700	Cameron Austin-Fell of RPS on behalf of Richborough Estates
1729 and 1776	Christopher Roberts and Taylor Cherrett of Turley Associates on behalf of Persimmon Homes Ltd and CALA Homes Ltd and Ainscough Strategic Land
1839	Tim Northey of Rectory Homes Ltd
1889	Victoria Firth of Granborough Parish Council
1913	Mark Behrendt of Home Builders Federation Ltd
1958 and 1975	Robert Love of Bidwells on behalf of Careys New Homes and Persimmon Homes Midlands
2207	Geoff Culverhouse of North Bucks Parishes Planning Consortium
2225	Gareth Sibley of RCA Regeneration Ltd
2622 and 2632	Christopher Wayman and Councillor Robin Stutchbury of Buckingham Town Council

Summary of Representations

- The proposed affordable housing percentage will not meet the need for affordable housing within Aylesbury Vale
- Requirement in Aylesbury Vale should match the 40% required in Wycombe
- To avoid overriding neighbourhood plans the policy should be revised by stating that “if any policy in a made neighbourhood plan for the area in question proposes a higher percentage then that higher percentage will be required”.
- To accord with the figure used in some Neighbourhood Plans such as Buckingham the proportion of affordable housing sought in Proposed Policy H1 be increased to 35%.
- The 25% figure would be acceptable if there was a stipulation that half of it would be social housing for rent - otherwise, the requirement should be at least 33% if not more
- The 6850 figure quoted equates to 25% of the total number of homes rather than 25% of homes on schemes with an affordable housing requirement, which will be a lower figure.
- policy should be amended to secure affordable housing contributions on smaller sites in AONBs and Designated Rural Areas, in line with rural areas designated under s157 of the 1985 Housing Act
- The supporting text to the policy should recognise that any ‘clustering’ figure will be applied flexibly having regard to those communities created following development and the principal day-to-day interactions that will result;
- Policy H1 should be amended to say "for residential developments of 11 or more dwellings gross or sites of 0.3ha or more, the council will seek a minimum of 25% affordable homes on site, subject to viability"
- Previous percentage set out in the draft plan should be implemented
- There appears to be limited justification for the new figure of 25% and also its treatment as a minimum requirement, therefore until this is appropriately evidenced based, this element of the policy is not considered to be justified.
- It is considered that inclusion of the word 'minimum' will not provide developers with clarity as to the actual quantum of affordable provision needed to design a policy compliant scheme. Amend policy to say ‘up to’.

- Percentage should be 30% and smaller villages need special treatment due to threshold
- There is scope for the Council to consider a lower percentage of affordable housing provision. Viability testing will need to be considered on a case by case basis. The Council should strongly consider incorporating reference to Starter Homes as part of the affordable housing requirement.
- The requirement for affordable dwellings to be delivered on sites over 0.3ha should be replaced by the ministerial statement's 1000sq.m threshold.

AVDC Response

The affordable housing requirement for Aylesbury vale has been determined via the production of the Housing and Economic Development Needs Assessment (HEDNA). This has been produced following the government guidance relating to the production of such assessments. As set out in the HEDNA in the past such an assessment was undertaken on the basis of what percentage of a household's income could reasonably be spent on meeting their housing need before they would be considered to be in housing need. The assessment method has now changed though meaning that only those households who cannot meet their housing need by any means are counted as being in need. For example a household that was spending more than 35% of their income on meeting their housing need would have been in need in the past but if that household can still afford the housing despite it consuming a very large part of their income then that household is not in need. Need figures have therefore dropped.

To be in accord with government planning policy and guidance, and so meet a test of soundness, the council has no option but to apply the method it has used to assess the need for affordable housing. The percentage put forward in VALP represents an uplift though on the 21% that the HEDNA concludes is needed to meet affordable housing need to address the shortfall that would result from the threshold excluding developments of ten houses or less that is required by the government. The adjustment is required to ensure that the council is in accord with the NPPF's requirement to ensure that the total amount of affordable housing required to meet the HEDNA forecast is met.

Prior to the production of VALP Neighbourhood Plans were produced in Aylesbury Vale on the basis of existing evidence which did not apply the new method of affordable housing need assessment set out above. As a result those plans could justify a higher level of affordable housing need. That evidence is now out of date though and the newer evidence must inform the new local plan using the prescribed method for assessment. The modification to the policy suggested by Mr Saunders is one that the council would wish to implement if possible though to address this

disparity as the percentage in neighbourhood plans has been tested at examination and is part of the development plan.

It has been noted that Wycombe has determined that its affordable housing need percentage should be 40% on brownfield sites and 30% on greenfield sites. There are however significant disparities in the way the housing market is behaving in Wycombe compared to Aylesbury Vale. This is recognised in the HEDNA where it is determined that the market adjustment is significantly higher than that for Aylesbury Vale. That policy will also be informed by viability evidence which will also differ from that for Aylesbury Vale. Lastly the percentages for Wycombe may well change as a result of the examination of their local plan. Parity cannot therefore be justified.

In determining the appropriate percentage for affordable the 25% requirement has been found to be viable in all circumstances tested and 30% is viable in some cases. The council therefore feels it is justified in requiring that percentage as a minimum. Up until the production of VALP the viability of the affordable housing percentage was constantly challenged. However with the viability evidence supporting VALP and the developability of allocated sites having been assessed during the production of VALP it is not considered that the viability of housing developments can be challenged on the basis of a 25% requirement. Particularly as observed in the representations the average provision in recent years has been calculated at 31%. Indeed the council considers in some cases that a higher percentage will be achievable and will seek a higher percentage than the minimum requirement where it is considered reasonable.

The council has taken account of the HEDNA's content in determining the types of housing that will be sought as affordable. As can be seen in VALP though an exact breakdown of types of affordable housing has not been set out. Instead the council will negotiate on the basis of the best evidence at the time on the nature of local need as and will also need to address the implications of government policy on such matters as affordable rents. It is argued that this will give the best chance of developments meeting actual local needs rather than general figures set at one point in time for the whole district.

The council has investigated whether it can have a policy to secure affordable housing contributions on smaller sites in AONBs and Designated Rural Areas, in line with rural areas designated under s157 of the 1985 Housing Act and determined that there are no areas within Aylesbury Vale that appear within the list set out in the Act. It therefore cannot set a lower threshold within its area as suggested.

The council agrees that the threshold will have a limiting effect on the delivery of affordable housing in smaller villages. However it is still possible to gain affordable housing by the allocation in a neighbourhood plan or permitting of exception sites where there is evidence of need derived through a housing needs assessment.

The matter of starter homes has been considered by the council but the implementation of this initiative by the government has stalled and the recent draft NPPF fails to mention them. The council will therefore have to implement the initiative without them appearing in the local plan if the government makes their provision a requirement.

After careful reading of the ministerial statement it was considered that both aspects of the threshold need to appear in the plan not just the 1,000 sq m requirement.