

**Statement on Matter 2g “Affordable Housing”**  
**Matter for discussion (7): “Does the VALP figure supersede higher figures in NPs**

**David Saunders (for Great Horwood Parish Council)**

**1 The evidence for amending policy H1 to take account of higher requirements in neighbourhood plans**

1.1 Representations have been submitted suggesting that VALP policy H1 should be amended to include a provision that if a neighbourhood plan proposed a higher requirement than the minimum of 25% then that higher requirement should apply. (This would be subject to the provision in paragraph (b) of the policy regarding affordability.)

1.2 My understanding is that AVDC would have accepted such an amendment, but were advised that would raise questions regarding soundness. I refer first to AVDC’s response to Q779 (ED110) where on p.3 it is stated

“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.”

However, paragraph 10 of the Opinion provided by Ms Ornsby and Ms Barnes (ED77) states:

“In theory, this is possible. The difficulty, however, is that the different targets will need to be robustly supported by evidence. Further, for the VALP to be found sound, it will be important to show that a consistent approach has been taken across the area on a consistent evidence base. As such, it will be difficult to justify the different treatment of a small number of areas with their own particular earlier evidence base if a similar evidence base has not been prepared for all the parishes/sub-areas covered by the VALP and in any event the earlier evidence base is now inconsistent with the latest evidence base for the Local Plan in so far as it relates to the level of provision of affordable housing.”

1.3 It is not clear that the “earlier evidence base” is necessarily inconsistent with the “latest evidence base” regarding affordable housing.

1.4 The evidence used to support affordable housing requirements in neighbourhood plans is commonly based on housing needs surveys conducted using survey forms based on a format originally designed by DEFRA, used by Rural Housing Enablers across the country, and supported by AVDC.

1.5 Such evidence is regarded as robust. For example, in an enquiry regarding a called-in application in Great Horwood in 2016 (3137967), the housing survey conducted for the Great Horwood Neighbourhood Plan in 2014 was referenced in paragraphs IR28 and IR133 with no critical remarks.

1.6 Furthermore, such evidence is at a finer level of granularity than the district-wide evidence presented in the HEDNA. Even if the district-wide evidence is more recent, the local evidence is more specific. Apparent inconsistency of the latter with the former may simply indicate that the former is an average, and may conceal specific variations. The latter might (for example) include

cases where the need involved a particular local connection, such as employment in a village with poor transport links. Such local connections would not be caught in the district-wide approach.

1.7 I therefore contend that the present version of policy H1 is unsound in that the failure to take account of the affordable housing requirements in neighbourhood plans, and hence of the evidence supporting those requirements, is unjustified.

## **2 Whether affordable housing policies in neighbourhood plans can be superseded**

2.1 The discussion on Matter 9 considered whether it was the intention of VALP policy H1 (as written) to “supersede” affordable housing policies in neighbourhood plans, in the sense of the Local Planning Regulations 2012, where a new policy supersedes an old policy, so that the old policy is no longer part of the development plan.

2.2 I do not believe that this can be the intention of VALP, for the following reason.

2.3 Although some neighbourhood plans have specific policies relating to affordable housing, which could in principle be superseded by VALP policy H1, there are five neighbourhood plans which have affordable housing requirements embedded in policies which are substantially about other matters. There are: Cheddington, Great Horwood, Long Crendon, Steeple Claydon, and Wingrave with Rowsham.

2.4 For example, Cheddington Neighbourhood Plan Policy 2 is a site allocation policy, allocating three sites for development, and then stating

“Planning applications should make on-site provision for 35% of dwellings to be affordable homes unless it can be demonstrated that a lower provision is necessary to make a viable scheme.”

Such a policy is clearly not intended to be superseded (as a whole) by VALP, and any modification to the policy would be just that – a modification – which would not fall under the ambit of Regulation 8(5).