

From: "Roy van de Poll"
Subject: Session 18 - Affordable Housing
Date: 15 July 2018 at 11:23:00 BST
To: "'PO Services'" <louise@poservices.co.uk>

Dear Louise

I feel I must register the fact that I came away from Friday's Hearing Session lacking answers to certain points addressed to Jonathan Lee/AVDC during the Session by the North Bucks Parishes Planning Consortium. NBPPC feels it was/is entitled to a response. It was my intention to raise this matter, to read out the note from Buckingham Town Council and answer any questions (that had been agreed by the Inspector at the start of the Session) and mention a couple of other points when, as he had done in all previous Sessions I attended, in wrapping up the Session he asked those round the table if there were any issues people wished to raise that had not covered. When we broke for lunch at gone 2.00 pm, like other attendees I thought Session 18 was to be reconvened after lunch but this proved not to be the case.

The matter of the Buckingham Town Council's note on the substantially higher Affordable Housing percentages of all neighbouring LPAs has been addressed by registering Councillor Cole's note as a Hearing Session document.

The matters NBPPC raised were amongst quite a number of issues introduced by other representors. Before asking the Council to respond, I understood the Inspector to ask Mr Lee to address the points raised by other respondents first, followed separately by answering the NBPPC's issues. This did not happen but perhaps I misunderstood the Inspector's direction to Mr Lee.

The points raised, which NBPPC highlighted at the Session were -

- Mr Lee's explanation of ORS's assessment of the quantum of need for new Affordable Housing in the district, using their stringent approach, only appears to the Consortium to address the need for Affordable Homes for rent. Currently, this represents 75%

of affordable homes delivery in the Vale, the other 25% being for part ownership affordable homes, where the household income to qualify for such dwellings is very different from that of family units qualifying for rented affordable homes. So the question was whether or not ORS's approach considered this segment of Affordable Homes delivery and identified the need for part ownership affordable homes and its quantum during the Plan period?

- During the evidence gathering process, did ORS consult with the organisations which manage the allocations of new affordable homes for rent and for part ownership to establish current backlogs, trends in demand and, in their informed and expert opinions the future demand based on their local knowledge?

- In light of Mr Lee advising that 25% delivery of Affordable Housing on qualifying sites would deliver many more affordable homes than the district had hitherto seen, NBPPC believes that the evidence in Paragraph 1.48 of VALP, which advises that the average annual housing delivery in the Vale for the past 5 years was 1,127, **of which 349 was the average annual delivery of affordable homes**, proves this advice to be incorrect. This data confirms a 31% delivery of new affordable homes across qualifying and non-qualifying sites. This would therefore suggest that the contribution from qualifying sites must have been at least 35% during that recent 5 year period. Paragraph 1.48 of VALP proves beyond reasonable doubt that a minimum figure much higher than 30% would be viable in almost all cases. 20 years at 349 affordable homes per annum provides us with a figure of 7,000 for the Vale's needs alone.

The other points NBPPC had intended to raise were the following-

- If, as appears to be the case from the evidence provided, ORS has only assessed the need in the Vale for affordable homes for rent and overlooked the part ownership element, then the figure of 25% delivery of affordable homes solely for rent on qualifying sites needs to be increased by a third to 33.3% to provide for the part ownership element as well.

- VALP fails to grapple with the issue of nearly 30% of the total

housing figure for the Plan period coming from the unmet need of 8,000 homes from the LPAs in the south of the County in the final 12 years or so of the Plan, where the LPAs concerned are surely expecting delivery of affordable homes in accordance with their adopted Local Plan eg 40% for Wycombe District's LP. As seemingly appears to be the case, to base the overall percentage delivery of affordable homes solely on the Vale's requirements, when nearly 30% of housing delivery for the Plan period will be for unmet need, is a flawed approach and therefore unsound. How does VALP rationalise its strategic Affordable Housing percentage of 25% for the Vale's OAN and meeting the unmet need for Affordable Housing for neighbouring LPAs with their significantly higher percentages for their Affordable Housing needs, when we have heard the Council's view that all new qualifying sites must abide by the 25% figure in VALP, once it is adopted?

· Is it not very telling that the Vale of Aylesbury Housing Trust in their representation recommended a modification to the Plan ***to increase the affordable housing requirement from 25%, as proposed, to 31% as previously proposed or higher to meet actual demand?*** Which other organisation has a better grasp of the real affordable housing demand for rented units in the Vale than VAHT? However, it appears that they were not consulted in the preparation of the Topic Paper.

NBPPC looks forward to receiving a response in due course.

Thanks and kind regards

Roy