



Proposed Submission Vale of Aylesbury Local Plan (Regulation 19)

Housing Topic Paper

November 2017

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1 Introduction

- 1.1 This Topic Paper summarises the background, context and evidence which has informed the drafting of the Proposed Submission Vale of Aylesbury Local Plan (VALP) (Regulation 19) housing policies. The topic paper outlines the national policy context and then the process of development and the justification for the approaches taken in VALP to the various sub topics in this paper.
- 1.2 This topic paper is one in a series that, explain how the strategy for VALP has developed and the data, evidence and feedback that has informed choices made in formulating policies. The topic papers aim to provide background information; they do not contain policies, proposals or site allocations. All topic papers will be finalised to accompany the submission of the VALP to the Secretary of State for examination.
- 1.3 This topic paper relates to the following VALP policies set out in the proposed submission plan:
- S1 Sustainable development for Aylesbury Vale
 - S2 Spatial strategy for growth
 - S3 Settlement hierarchy and cohesive development
 - D1 Delivering Aylesbury Garden Town
 - D2 Proposals for non-allocated sites at strategic settlements, larger villages and medium villages
 - D3 Housing development at smaller villages
 - D4 Housing at other settlements
 - All housing allocation policies
 - D9 Housing in Aylesbury town centre
 - H1 Affordable housing
 - H2 Rural exception sites
 - H3 Rural workers dwellings
 - H4 Replacement dwellings in the countryside
 - H5 Self/custom build housing
 - H6 Housing mix

1.4 This paper cannot contain all the detailed information which has been drawn on to develop the VALP so this paper should be read with the following documents which can be found on the supporting evidence pages on the council's website:

- Vale of Aylesbury Local Plan - Proposed Submission VALP - 2013 - 2033, September 2017
- Buckinghamshire HEDNA (December 2016) and appendices
- Buckinghamshire HEDNA update 2016 Addendum (September 2017)
- Housing Market Areas and Functional Economic Market Areas in Buckinghamshire and the surrounding areas (March 2015) and technical appendices
- HMAs and FEMAs in Buckinghamshire: Updating the evidence (June 2016)
- HELAA version 4 - Erratum (January 2017)
- Housing delivery study for Buckinghamshire (August 2017)
- Strategic Landscape and Visual Capacity Study (August 2017)
- New Settlement Scoping Study (June 2016) and appendices
- Settlement Hierarchy Assessment (September 2017)
- Viability assessment (August 2017)
- SA to accompany pre submission plan (September 2017) – Main Report
- SA to accompany pre submission plan (September 2017– Technical annex
- Habitats Regulations Appraisal Report (April 2017)
- Habitats Regulations Assessment Addendum on RAF Halton (August 2017)
- Buckinghamshire MOU (July 2017)
- Buckinghamshire Green Belt Assessment Report Part 1 (March 2016)
- Buckinghamshire Draft Green Belt Assessment Methodology Part 2 (July 2016)
- Aylesbury Vale Green Belt Assessment Report Part 2 (July 2016)

1.5 The national Planning Policy Framework contains 12 Core planning principles and these include the following core principle that relates to housing:

“Planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other

development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities”.

- 1.6 The section of the NPPF on Plan-making refers to a range of strategic priorities that local plans should address. These should be pursued by the inclusion of strategic policies to cover the homes and jobs needed in an area (paragraph 156). Other parts of the NPPF also relate more specifically to aspects of housing development, but are referred to at the start of the relevant section of this topic paper rather than in this introduction.
- 1.7 The Government also publishes Planning Practice Guidance (PPG) across a range of topics to provide further direction to supplement the NPPF. This guidance is specifically referenced in relation to the appropriate subject matter within this topic paper. The PPG is updated as necessary and this topic paper relates to the guidance extant at the time of writing.
- 1.8 The context for the housing policies in the Vale of Aylesbury Local Plan is that Aylesbury Vale is a large district, with a resident population of 174,100 people at the time of the 2011 census, and an estimated 78,591 homes in March 2016. Around 40% of the population live in the main town of Aylesbury. The other largest settlements are Buckingham, followed by Haddenham, Wendover, and Winslow. There are a large number of smaller settlements dispersed across the rural parts of the district.
- 1.9 The district continues to grow in terms of population and houses. The rates of house building over recent years have remained high with an average of 1,127 dwellings built each year over the past five years. Out of this total, an average of 349 were affordable dwellings.
- 1.10 Various studies supported and informed the development of the VALP. Relevant outcomes and conclusions from the studies are considered below. It is important to note that the locations assessed for potential additional development in the area were assessed in relation to a wide range of factors to determine their suitability for development in accord with Government guidance. The potential development sites were then also considered as part of the Sustainability Assessment. The process for site selection and development of the strategy for the VALP is therefore based on an adequate, up-to-date and relevant evidence as required by paragraph 158 of the NPPF.
- 1.11 In January 2017 the council was successful in its Garden Town Bid for Aylesbury as part of the government’s Garden Town Programme. The bid recognises Aylesbury’s unique role in delivering 50% of the district’s housing needs and the opportunity that developing new housing allocations (combined with existing committed and sites already built) in delivering around of 15,800 new dwellings between 2013 and 2033. The success of this bid has provided the opportunity to develop Aylesbury and the surrounding area in a visionary and sustainable way. The council will now be in a position to apply for funding from the government to support those new communities with the roads and facilities they’ll need, and ensure everyone can travel around the Vale more

easily.

- 1.12 A Masterplan will be produced for the Garden Town which will set out all the required key strategic physical and social infrastructure and how it will be funded. The Masterplan will also set out specific design guidance which will further define the character of the Garden Town and provide design guidance for key components such as transport and movement routes, parks and green space and built development, and focus on delivery and implementation of this.
- 1.13 The housing policies in the proposed submission VALP are generally strategic in nature and “Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan” (NPPF paragraph 184). There are 14 ‘made’ Neighbourhood Plans and a number of them allocate housing sites. Those sites are regarded as commitments by virtue of those allocations as the relevant neighbourhood plans are part of the development plan for Aylesbury Vale due to their made status. This topic paper does not seek to justify the allocation of these sites as their justification has already been addressed by the Neighbourhood Plan Examinations.
- 1.14 The Government finally published its much awaited Housing White Paper on 7 February 2017. As expected, it contained a number of proposals for increasing house building as the number of new homes being built across the country continues to fall short of the Government’s housing target. The document also suggests a range of other changes that will have implications for the content of local plans such as a new definition of what constitutes affordable housing. At this point we cannot say exactly what impact the content of the white paper may have on the Vale of Aylesbury Local Plan (VALP) and further details are awaited on much of the paper’s content.
- 1.15 Many of the White Paper’s proposals are framed as suggested changes to the NPPF. These will have implications for planning decisions in Aylesbury Vale as well as the final stages of development of the if the revised NPPF is produced prior to the close of the VALP Public Examination. The soundness tests for local plans require them to be consistent with national policy. This is not an unusual situation as policy is often amended after a plan is submitted and before the Examination closes and the council will be expected to suggest modifications during the Examination to address revisions to the NPPF.
- 1.16 In September 2017 the Government published the ‘Planning for the right homes in the right places’ consultation document, which proposes a new housing need calculation method. Provided that the VALP is submitted before March 31 2018 the new calculation method will not apply to VALP. As stated in the VALP the plan will be subject to an early review after adoption to address a number of longer term planning issues, such as the route of the Oxford Cambridge Expressway and it is expected that the housing figures generated by the final calculation method will be addressed as part of that review. The Government has also stated that a revised National Planning Policy Framework (NPPF) will be published in early 2018. As set out above this means the VALP will need to take into account its content as part of the Examination.
- 1.17 The draft Vale of Aylesbury Local Plan was subject to consultation in 2016. Some 1,630 responses were received containing over 5,000 comments about the draft plan. A summary of consultation responses was prepared and

published on the council's website. As set out in the consultation summary most of the responses referred to housing in some part. Attention was particularly focused on the then housing figure of 33,400 new homes and the requirement from adjacent councils to accommodate substantial amounts of unmet housing need. Many respondents considered that the suggested locations for housing would overwhelm existing communities, particularly the two potential new settlements, and the proposed percentage approach to determining levels of housing in settlements was often criticised as being arbitrary and unjustified.

- 1.18 Subsequent to the conclusion of the public consultation process and assessment of the responses to the draft VALP the council announced via the meeting of the VALP Scrutiny Committee 16 December 2016 a number of changes to the overall approach taken to the VALP strategy. Due to revised housing figures reflecting adjustments to national forecasts and the outcome of negotiations relating to unmet housing need from adjacent plan areas the total of housing need reduced significantly. This reduction made the inclusion of a new settlement unnecessary. In relation to the percentage approach to the distribution of development amongst settlements it was stated that alternative approaches to distributing development were being considered based on the capacity of settlements.

2 Establishing the housing land supply

National context

- 2.1 Paragraph 47 of the NPPF states that “To boost significantly the supply of housing local planning authorities should
- identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;
 - identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;”
- 2.2 This planning policy is then supplemented by two footnotes which state that:
- “To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.
- To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.”
- 2.3 Paragraph 48 of the NPPF then states that “Local planning authorities (LPAs) may make an allowance for windfall sites in the 5 year supply if they have compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply”.
- 2.4 NPPF Paragraph 159 addresses how evidence should be prepared in relation to the requirements set out above. It states that LPAs should “prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period”.
- 2.5 Detailed guidance is contained within the PGG in relation to Housing and Economic Land Availability Assessments (HELAAAs) which are equivalent to a SHLAA but also assess economic development sites as well as housing sites. The PPG states that an assessment should:
- identify sites and broad locations with potential for development;

- assess their development potential;
- assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

2.6 The guidance clarifies that the assessment does not allocate sites for development and not all sites assessed will be found to be suitable. The assessment should be undertaken with the assistance of other councils and should involve a wide range of appropriate bodies from the outset. There should be no restriction on the quantity of land involved and all sites with a capacity of 5 or more dwellings should be assessed. Plan makers should issue a call for potential sites and broad locations for development, which should be aimed at as wide an audience as is practicable.

2.7 To be determined suitable for development the sites and broad locations should be assessed against national policies and designations to establish which have reasonable potential for development. A range of information including physical and environmental characteristics should also be recorded and evaluated for each site. Sites must be available for development so there should be no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. To be considered achievable sites must be viable for development. When completed a HELAA will contain an assessment of each site or broad location, in terms of its suitability for development, availability and achievability together with information on the potential type and quantity of development that could be delivered on each site/broad location.

Assessment of housing land supply

2.8 The assessment of housing land availability commenced with a call for sites in early inviting landowners and developers to submit sites for consideration through a HELAA process. The methodology for assessing sites was agreed through joint working between the four Buckinghamshire councils to ensure that a common approach to the assessment of land availability would apply across the 'best fit' Housing Market Area which was published in May 2015 after a stakeholder consultation in Spring 2015.

2.9 The methodology utilised other sources of sites on top of those derived from the call for sites. This included withdrawn or refused planning applications, existing local plan allocations, sites contained in the previous SHLAA and suggestions from planning staff. The assessment automatically excluded sites for a range of reasons including sites of less than five houses capacity, ongoing Employment sites that were not recommended for release, sites not related to a settlement, non-brownfield sites in the Green Belt and sites within functional floodplains. The following environmental constraints were then considered:

- Areas of Outstanding Natural Beauty and their setting
- Flooding (surface water and fluvial)
- Biodiversity Action Plan Priority Habitat Sites
- Local Nature Reserve
- Local Wildlife Sites
- Biological Notification sites
- Grade 1, 2 and 3a agricultural land quality
- Local landscape designations

- Long distance views and Landscape Character Assessments/ sensitivity studies
- Historic landscapes and their setting
- Topography
- Listed buildings
- Conservation areas and their setting
- Archaeological findings
- Local Geological Sites
- Tree Preservation Orders
- Mature Woodland
- Loss of established hedgerows
- Public Rights of Way
- Designated Open Space/ Green Space
- Potentially Contaminated Land
- Noise and pollution constraints
- Presence of utility equipment

2.10 The assessment also covered the availability and achievability of the sites for development and the implications of national planning policy. The potential site capacity was also evaluated with reference to such factors as recent planning application history, requirements for onsite infrastructure e.g. roads, school and healthcare provision (large urban extension will require more) and stakeholders advice e.g. developers' advice on expected densities.

2.11 As set out in the VALP an assessment of windfall capacity was also undertaken based on the average dwelling completions for small sites (four or fewer dwellings) over the last ten years (2007 – 2017). As the windfall allowance is based on completions a non-implementation allowance is not needed. Based on the council's monitoring information there has been a consistent and reliable supply of windfall sites as follows:

Historic windfall completion rates on sites with fewer than five dwellings

Year	Completions on small windfall sites (fewer than five dwellings) net (excluding residential gardens)
2007/08	85
2008/09	110
2009/10	54
2010/11	29
2011/12	66
2012/13	55
2013/14	84
2014/15	82
2015/16	81
2016/17	94
Total	740

2.12 The average number of homes delivered on windfall sites over the last 10 years (1 April 2007 – 31 March 2017) is 74 per annum and this is considered to be a consistent and reliable supply of windfall sites. The windfall allowance is not

applied to the next three years as sites under five dwellings are coming forward in this time period are likely to already have planning permission and therefore are counted as commitments. This gives a total windfall allowance of 962 dwellings for the last 13 years of the Plan period, 2020-2033.

- 2.13 In the first published version of the HELAA in October 2015 it was concluded that there was a total potential capacity for 22,593 dwellings on 190 sites. In addition there was also planning permission for 60 dwellings on sites outside of HELAA settlements, permission for 353 dwellings (already reduced by 10% for non delivery) on sites below 5 and evidence that 876 dwellings could be delivered in total on windfall sites (sites below 5 in years 4-15). Including this on top of the HELAA capacity gave a total potential capacity of 23,882 dwellings.
- 2.14 Subsequently the HELAA was consulted on alongside the VALP Issues and Options and Draft VALP consultations. This led to further sites being suggested and sites were also suggested independently of the consultations. The second version of the HELAA published in May 2016 and concluded that a total potential capacity for 25,882 dwellings existed on 239 sites to be delivered during the plan period 2013-2033. In addition to this HELAA capacity there was also planning permission for 22 dwellings on sites (over 5 units) outside of HELAA settlements, permission for 353 dwellings (already reduced by 10% for non delivery) on sites below 5 and evidence that 876 dwellings could be delivered in total on windfall sites (sites below 5 in years 4-15). Including this on top of the HELAA capacity gave a total potential capacity of 27,133 dwellings.
- 2.15 The third version was published in January 2017 and it indicated a total potential capacity for 25,571 dwellings on 234 sites to be delivered during the plan period to 2033. In addition to this HELAA capacity there is also planning permission for 413 dwellings (already reduced by 10% for non delivery) on sites below 5 and evidence that 888 dwellings could be delivered in total on windfall sites (sites below 5 in years 4-15). Including this on top of the HELAA capacity gave a total potential capacity of 26,872 dwellings. Completions for the first three years of the plan period up to March 2016 totalled 3,600 dwellings giving a total maximum notional capacity of 30,472 dwellings.
- 2.16 Following the production of the third version of the HELAA significant amounts of further work was undertaken through detailed consideration of the suitable and part suitable sites to establish in more exactly their development potential prior to their potential allocation in the local plan. This included site specific workshops involving officers from within Aylesbury Vale District Council and colleagues from Buckingham County Council. These examined detailed site layout matters such as potential layouts and site access points. In many cases this led to a revision of expected site capacities.
- 2.17 Further detailed studies also fed into the assessment of the sites. This included information supplied by site owners and promoters. The implications of requiring 50% green infrastructure on potential allocations was addressed. Further detailed site specific landscape assessments allowed appropriate site boundaries to be established. The implications of the Strategic Flood Risk Assessment were addressed on a site by site basis with areas within sites being excluded from development as a result.

- 2.18 At the same time as this detailed site specific assessment several Neighbourhood Plans were progressed. Although informed by the content of the HELAA these plans undertook their own assessment of sites and came to different conclusions as a result. This led to sites deemed as unsuitable in the HELAA being allocated in made neighbourhood plans. As a result these sites are regarded as commitments and have increased the apparent supply of suitable sites in the plan area.
- 2.19 A significant site deemed unsuitable in the HELAA because of its Green Belt status and its existing use discounting it from being regarded as previously developed land was RAF Halton. However the announced closure in December 2016 changed the context in that it would be previously developed land once the facility finally closes in 2022. As a result the area can be redeveloped for housing provided that it does not reduce the openness of the Green Belt or have significantly harmful implications for the other designations which apply to the site. An initial broad assessment established that there were 44 barrack blocks capable of conversion and a significant number of buildings on the site which could be demolished and replaced with housing. A guide capacity of 1,000 dwellings was therefore established and after further assessment it was considered as an acceptable site for allocation in the local plan. Effectively this replaced the suggested alteration to the Green Belt proposed in the Draft VALP in providing housing in association with the strategic settlement of Wendover.

3 Establishing the levels of housing growth for VALP

National Context

- 3.1 As set out in paragraph 47 of the NPPF local planning authorities should:
- “use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period”
- 3.2 Further direction is given by paragraph 50 of the NPPF which states that “To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:
- plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);
 - identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and
 - where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.
- 3.3 To establish the local parameters for the application of the NPPF’s contents in relation to establishing housing need paragraph 159 states “Local planning authorities should have a clear understanding of housing needs in their area. They should:
- prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment Plan-making should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:
 - meets household and population projections, taking account of migration and demographic change;
 - addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);and

– caters for housing demand and the scale of housing supply necessary to meet this demand;

3.4 This policy is then supplemented in detail by the content of the Planning Practice Guidance (PPG) which contains a specific section entitled Housing and economic development needs assessments. This encompasses the Strategic Housing Market Assessment requirement as set out in the National Planning Policy Framework. An essential starting point is the area over which the prediction will be based. As set out in the PPG “needs should be assessed in relation to the relevant functional area i.e. Housing Market Area”(HMA). The guidance states that local planning authorities should work together in defining HMAs under the Duty to Cooperate.

3.5 The PPG defines a HMA as a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. The basis for defining a HMA will vary according to the circumstances in an area, but the guidance indicates HMAs can be broadly defined by using 3 different sources of information as follows.

- House prices and rates of change in house prices
- Household migration and search patterns
- Contextual data (for example travel to work area boundaries, retail and school catchment areas)

3.6 In relation to assessing housing need the PPG states that the starting point should be the Household projections published by the Department for Communities and Local Government. Importantly the guidance states that the household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. The guidance also indicates that plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates.

3.7 To determine the scale of any local adjustments the PPG says that local employment trends and local market signals should be examined. For employment this means considering expected employment growth against the expected increase in working age population to see if any uplift in housing numbers is justified. For housing it means considering whether such factors as house prices and affordability justify an increase in the housing numbers.

Assessment of overall housing need

3.8 As with the assessment of housing land availability a joint ‘Bucks’ approach was taken to establishing HMA boundaries and the overall housing need to ensure that the council met its responsibilities under the Duty to Co-operate in relation to strategic matters which cross council boundaries. Both the identification of the HMA boundaries and assessment of overall housing need were undertaken by the ORS consultancy on behalf of the four Bucks district councils.

- 3.9 The 'Housing Market Areas and Functional Economic Market Areas in Buckinghamshire and the surrounding areas Report of Findings' was published in March 2015 and this was updated by the 'HMAs and FEMAs in Buckinghamshire: Updating the evidence Further analysis of data from the 2011 Census' report which was published in June 2016. As set out in the initial report, the aim of the study was to derive a consensus from local planning authorities and other relevant stakeholders about the most appropriate HMAs and FEMAs for Buckinghamshire and surrounding areas. These functional geographies would then provide the Buckinghamshire councils with a basis for joint working arrangements in order to develop the evidence base required for assessing the future housing and economic development needs. This analysis of functional HMAs and FEMAs, together with the separate assessments of need, will help inform decisions about housing and employment land.
- 3.10 The approach was based on established approaches to defining HMAs which utilise commuting flows and migration patterns as the most relevant information sources when seeking to establish upper-tier housing market areas. The degree of self containment was the prime determinant of the relevant areas which needed to reach 75% to be valid. The resulting area contained the whole of the Wycombe and Chiltern council areas and the most densely populated parts of the Aylesbury Vale and South Bucks council areas. This involved parts of Aylesbury Vale falling within the Oxfordshire, Luton and Milton Keynes HMAs and the least populated part of South Bucks falling within a HMA.
- 3.11 The boundaries generated therefore did not provide a viable basis for determining housing need in large parts of Aylesbury Vale as they fell outside the Central Buckinghamshire area defined by the report. To enable the development of district specific figures the study then examined the degree to which Aylesbury Vale is connected to the four HMAs that it relates to. Historically the strongest association was with Milton Keynes however analysis demonstrated that the strongest connections were to Wycombe and Chiltern/S Bucks areas. South Bucks was considered to best relate to Reading & Slough HMAs. On this basis the 'best fit' HMA was considered to consist of the areas of Wycombe, Chiltern and Aylesbury Vale council areas.
- 3.12 Subsequently Chiltern and South Bucks agreed to prepare a joint plan. There was therefore a need to reconsider how a housing figure could be generated for this joint area based on HMA boundaries. The 'Buckinghamshire: Updating the evidence Further analysis of data from the 2011 Census' report undertook a similar exercise to that set out above for Aylesbury Vale and determined that the strongest connection of the joint plan area related most strongly to the rest of Bucks rather than to the Reading & Slough HMAs. On this basis the 'best fit' HMA was considered to then consist of the four Bucks district council areas encompassing the areas which fell within the council boundaries from the Oxfordshire, Milton Keynes, Luton and Reading & Slough HMAs. This conclusion has informed the Duty to Cooperate discussions between the four Bucks district councils and the preparation of housing needs evidence.
- 3.13 Initially Aylesbury Vale commissioned consultants to carry out a HEDNA which was solely focused on Aylesbury Vale's needs. This initial work was presented at stakeholder forums in October 2014 and a report taken to Council as part of a progress update. This approach however did not fully reflect the content of NPPF paragraph 47 which clearly states in paragraph 47 that local plans should

meet the full objectively assessed needs for housing in the housing market area. It was therefore determined that a new forecast of need would be required to inform a local plan.

- 3.14 Aylesbury Vale, Chiltern and Wycombe District Councils jointly commissioned consultants to produce a HEDNA to identify housing and economic needs for their new Local Plans. A joint HEDNA Methodology was then published in April 2015 and the draft findings of the Central Buckinghamshire HEDNA (CB HEDNA) were then shared at a series of forums in September 2015. The Central Buckinghamshire HEDNA Report of Findings Consultation Draft was then published in October 2015. We then invited comments on this document alongside the issues and options consultation.
- 3.15 The HMA boundaries had already been established in March 2015 and the first task addressed by the HEDNA was to consider what local data should be used and whether that local data contained any anomalies. The period to be used for population trends and has there been any suppression for household formation. A ten year trend was selected and some household suppression was evident. For Aylesbury Vale it was evident that the expected growth underlying the DCLG's projections was not occurring as expected this led to an reduction in the population starting point for Aylesbury Vale but the expected growth in Aylesbury Vale was then uplifted to 21,300 to address the suppression of households and an economic uplift because an affordable uplift would have been lower. For the other council areas a market signals uplift was required instead and their population starting points were revised upwards.
- 3.16 The HEDNA was then revised in January 2016 to reflect that Chiltern and South Bucks decided to prepare a joint plan and this meant the South Bucks area being included in the best fit HMA and the Bucks HEDNA. Subsequently the HEDNA was updated in October 2016 in a draft Bucks HEDNA in light of new population and household projection data being released. A final HEDNA report was then published in December 2016. The report highlighted that data issues were still present in the new figures in relation to Aylesbury Vale although they had been remedied for Wycombe. Adjustments for economic growth and household suppression were still required for Aylesbury Vale, but the net effect was to see forecast growth in Aylesbury Vale reduce by 2,000 new homes to 19,300. This was due to factors such as lower than expected household formation rates and reduced survival rates compared to previous assumptions. This constrained the population growth below previous expectations.
- 3.17 Finally in September 2017 an Addendum report was produced which contains a correction to the previously published HEDNA figures. This due to the final totals in the summary table not adding in a line in the table during the calculation of the totals. For Aylesbury Vale the effect was minor with an increase of 100 new homes taking the final total to 19,400 new homes being required to meet Aylesbury Vale's housing need.
- 3.18 The Draft VALP proposed to met the then HEDNA requirement and 12,000 homes unmet need from Wycombe, Chiltern and South Bucks. Through close and positive engagement the unmet need requirement reduced to 8,000 homes and the revision to the HEDNA figures reduced Aylesbury Vale's need to 19,400 leading to a combined housing requirement of 27,400 for the VALP.

- 3.19 Various issues were raised during consultation stages to query the levels of housing demand being forecast. There was reference to the original Aylesbury Vale HEDNA as being the more appropriate basis for the local plan but as stated above this does not deal with the HMA's need as a whole so it is not a valid basis for the local plan. There were also differing interpretations of the statistics used to inform the housing forecasts which indicated that the total number of houses required should be raised. However following consideration by the council's consultants it was considered that the interpretation of the figures included in the council's published HEDNA was a valid interpretation and the figures did not need to be revised.
- 3.20 There was also significant questioning of the basis for Aylesbury Vale accepting unmet housing need and the quantity of need being accepted. The basis for the arrangement was and is soundly based on Government planning policy and guidance on the subject. Through amendments to housing figures and positive engagement the unmet need figure was reduced to 8,000 dwellings a 33% reduction in the requirement. Through detailed consideration of sites it was accepted that there was no further capacity for reduction in the level of unmet need being requested. A Memorandum of Understanding was therefore signed in July 2017 between the councils to this effect.

4 The approach on affordable housing

National Context

- 4.1 As set out in paragraph 47 of the NPPF local plans a required to meet the full objectively assessed need for affordable housing in the housing market area. Paragraph 159 of the NPPF then stipulates that the forecast of housing need should address the need for all types of housing, including affordable housing. Importantly paragraph 173 of the NPPF stipulates that requirements for affordable housing should still allow development to provide competitive returns to a landowner or developer to enable the development to be deliverable. Therefore development must still be viable and affordable housing requirements cannot be required if they would render development unviable.
- 4.2 The Planning Practice Guidance (PPG) contains specific guidance on how affordable housing need should be established as part of a council's assessment of housing need. It states that plan makers working with relevant colleagues within their local authority (e.g. housing, health and social care departments) will need to estimate the number of households and projected households who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market.
- 4.3 Importantly there is no indication of what the ability of someone to meet their own housing need should amount to. Previously this was stipulated as a percentage of 25% of household income. Now that this stipulation has been removed the resultant level of affordable housing need has reduced as a result. Instead the assessment uses those on housing benefit as the basis for determining what proportion of households are in need of affordable housing as stated in the HEDNA "The affordability assessment used by the Model is relatively stringent insofar as it is only households that would be eligible for welfare support that are counted within the identified affordable housing need". This means that households who are spending more than 25% of their income on housing but are not eligible for housing benefit are not counted as in need of affordable housing.
- 4.4 The PPG sets out the list of households types that are considered in affordable housing need and how the current unmet gross need for affordable housing should be calculated based on a list of available local statistics including the number of homeless households and the number of those in priority need who are currently housed in temporary accommodation. The guidance then goes on to indicate how the number of newly arising households likely to be in affordable housing need should be calculated taking into account new household formation, the proportion of newly forming households unable to buy or rent in the market area and an estimation of the number of existing households falling into need. The supply of affordable housing is also referred to as needing to be established.

The approach to affordable housing

- 4.5 As set out in the HEDNA December 2016 to establish the past trends and current estimates of the need for affordable housing local authority data on homeless households and temporary accommodation, was considered

alongside census data on concealed households and overcrowding together with information from the English Housing Survey, Housing Register and information from Housing benefit data on households unable to afford their housing costs. Based on this information the study concluded that there are 3,311 households currently in affordable housing need in the Buckinghamshire HMA who are unable to afford their own housing. Deducting those whose housing is not suitable and households that will release their housing back into the market leaves a net need of a 1,150 households who that are currently in affordable housing need who are unable to afford their own housing.

- 4.6 To determine the future need for affordable housing the ORS Housing Mix Model considers the future number and type of households based on the household projections alongside the existing dwelling stock. Whilst the Model considers the current unmet need for affordable housing (including the needs of homeless households, those in temporary accommodation, overcrowded households, concealed households, and established households in unsuitable dwellings or that cannot afford their own homes), it also provides a robust framework for projecting the future need for affordable housing. This is supplemented by work to establish the proportion of newly forming households unable to buy or rent in the market area by considering the characteristics of the new households projected to form in Buckinghamshire each year. Overall, the Model projects that household growth will yield a net increase of 569 households on average each year that are unable to afford their housing, which represents 27% of the 2,082 overall household growth for this period.
- 4.7 The study then considers what portion of existing households are likely to need affordable housing in the future. The study concludes that the proportion of households in affordable need will actually reduce over the period covered by the study. Therefore, considering the overall changing needs of existing households, there is an average net reduction of 184 households (683 less 499 = 184) needing affordable housing each year. Taking this and all the other variables into account the study concludes that the total need for affordable housing in Aylesbury Vale over the plan period is 4,200 dwellings. This amounts to 21.8% of the forecast overall housing need for the plan period of 19,300 dwellings.
- 4.8 Government requirements now prohibit the requirement for affordable housing applying to housing sites of 10 or less dwellings. As this is expected to be a significant proportion of new housing development in Aylesbury Vale the percentage of affordable housing needs to be increased to 25% to allow the total requirement of 4,200 affordable dwellings for the district to be achieved. This is of course provided that the proportion of affordable required does not generally render proposed housing developments in Aylesbury Vale unviable on the basis of paragraph 173 of the NPPF.
- 4.9 The council has engaged consultants Dixon Searle Partnership to advise it on viability. They have concluded that the 25% affordable housing requirement should be viable in almost all cases. They have further advised that the affordable housing requirement of 30% could be viable in some cases. The council has therefore set the 25% requirement as a minimum in the proposed affordable housing policy which will allow a higher provision where justified by viability. The viability information is however clear that a requirement higher than

30% would not be justified.

- 4.10 Representations regarding affordable housing received during VALP consultations have focused on the percentage of affordable housing and have asserted that the level of affordable housing should be revised upwards. As set out above though the assessment is based on extant Government planning policy and guidance and as the local plan has to be based on this guidance and the evidence produced to support the plan it is not possible to justify an increase in the affordable housing requirement. Nevertheless the Government intends to change the definition of affordable housing amongst other initiatives and the local plan will need to be modified during the Examination to reflect expected changes. Housing delivery may therefore be much higher than it is based on the current system. Neighbourhood plans can also include higher percentages based on local evidence so the requirement in some areas may be higher than set out in the local plan.

5 Meeting other housing needs

National Context

- 5.1 As set out in paragraph 50 of the NPPF local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes). The NPPF then states in paragraph 159 that assessments of housing should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).
- 5.2 The Government's planning policy is then amplified by the Planning Practice Guidance (PPG) which indicates that a range of information, including the proportion of the population in different age groups and the various types of household within the population, to understand how age profile and household mix relate to each other, and how this may change in the future. The guidance then sets out more specific information in relation to the following categories of housing:
- The private rented sector
 - Self-build and custom housebuilding
 - Family housing
 - Housing for older people
 - Households with specific needs
 - Student housing
- 5.3 The Government's planning policy and guidance on these matters is taken into account in the HEDNA and specific conclusions are then reached in relation to following relevant topic areas
- The Private Rented Sector
 - Starter Home Initiative
 - Older People
 - Households with Specific Needs
 - People Wishing to Build their Own Homes
 - Service Families

The approach to meeting other housing needs

- 5.4 The HEDNA recognises that the private rented sector is a growing type of housing that is expected to grow further in the future and is an option for meeting the nation's housing need. The sector often allows those who cannot afford to buy their homes to access housing without recourse to benefit support. Recently the proportion of owner occupiers has increased and the proportion of private renting has also increased both at the expense at social rent. If the proportion of owner occupiers was the same as it was in 2001 then 7,100 of these households would have owned their home. While not all of the 7,100 will

necessarily qualify for Help to buy or Starter Home schemes this group do form the core target for this type of scheme.

- 5.5 The Housing and Planning Act 2016 promotes Starter Homes to provide properties that are more affordable for first time buyers. This initiative is still being brought fully into effect so its implications for housing need calculations cannot be determined yet. Nevertheless if the requirement for 20% of houses to be starter homes was brought into effect this would equate to around 9,100 dwellings over the 20-year period 2013-33. Based on the Government's announcements this 9,100 homes would be on top of the 21% affordable housing requirement which would leave 59% of housing as open market. Until more detail is available on the mechanisms to deliver the starter homes the HEDNA cannot deliver guidance for the local plan.
- 5.6 Due to longer life expectancy the proportion of the population beyond retirement age is growing and is expected to continue growing. In Buckinghamshire the number of people aged 75 or over is projected to increase by around 32,100 persons, around half of the overall growth. Using the Housing LIN Older People Resource Pack 2012 it is forecast that a total of 6,130 specialist housing units will be needed across Buckinghamshire with 2,430 of them in Aylesbury Vale. The HEDNA points out that the identified OAN of 45,600 dwellings does not include the projected increase of institutional population, which represents a growth of around 2,400 persons over the 20-year period 2013-33.
- 5.7 Households with specific needs is referred to in the PPG in relation to disabled people who require adaptations in the home. Approved Document M: Volume 1 (Access to and use of dwellings) of the Building Regulations introduces three categories of accessible dwellings as follows:
- Category 1: Visitable dwellings – Mandatory, broadly about accessibility to ALL properties
 - Category 2: Accessible and adaptable dwellings – Optional, similar to Lifetime Homes
 - Category 3: Wheelchair user dwellings – Optional, equivalent to wheelchair accessible standard.
- 5.8 As the number of people aged 65 or over is projected to increase by around 53,000 persons, around three-quarters of the overall growth, of which 18,000 persons will be aged 85 or over the HEDNA advises that all dwellings (including Older People's housing) should meet Category 2 requirements, providing that this does not compromise viability. Based on the fact that currently around 1-in-30 households in England (3.3%) have at least one wheelchair user, although the rate is notably higher for households living in affordable housing (7.1%), and this proportion is likely to increase the HEDNA advises that 10% of market housing and 15% of affordable housing should meet Category 3 requirements.
- 5.9 The Self-Build and Custom Housebuilding Act 2015 has now placed a duty on local planning authorities to plan to bring forward sufficient serviced plots of land, probably with some form of planning permission, to meet the need on the self build register and offer these plots to those on the register at market value. However the provisions to enable this to happen have not been put in place by the Government so it is not possible to determine exactly how the local plan

should address self-build and custom housebuilding.

- 5.10 Service families are relatively small in number in the area amounting to less than 0.5% of the population aged 16 or over. The needs of these families are already included within the overall level of housing need identified for Buckinghamshire HMA; however the HEDNA advises that Councils will need to ensure that arrangements are in place to properly address the needs of service families in the area.
- 5.11 Significant representations were not received at draft VASLP stage to the policies relevant to meeting other housing needs. The County Council queried how the content of the plan related to its strategy for meeting the needs of older people. Due to the strategy and the VALP being based on different population data it has been agreed that Aylesbury Vale and the County Council will work together to define the exact implications of the Council's Strategy for the content of VALP and this is reflected in the proposed submission VALP.
- 5.12 The approach in relation to meeting the needs of those with mobility issues that require the use of a wheelchair was queried on the basis that there was no valid local data to demonstrate that 10% of houses meeting category 3 in part M of the Building Regulations. This recognised in the PPG which states that there is no one source of information about disabled people who require adaptations in the home, either now or in the future. The guidance refers to the census refers to the number of persons with long-term limiting illness but states that not everyone in that category will need to use a wheelchair. It is therefore considered that the basis for the HEDNAs conclusion which is based on the DCLG guide to available disability data as referenced by PPG which shows that currently around 1-in-30 households in England (3.3%) have at least one wheelchair user and the rate is notably higher for households living in affordable housing (7.1%) is most accurate available evidence.

6 Site selection

Context

- 6.1 As set out in section 2 of this topic paper the initial supply of housing sites is established through a land availability assessment (HELAA). Then, as set out in section 3 of this topic paper the housing need is established through a needs assessment (HEDNA). There is often a greater supply of housing than the requirement and a selection of sites then needs to take place to determine which sites should be allocated in a local plan. The selection of sites for the draft VALP was simplified by the fact that the level of need envisaged of 33,300 dwellings meant that all suitable sites needed to be allocated, as well as a potential new settlement, a site to be removed from the Green Belt and housing requirements for smaller settlements which exceeded capacity in many locations. The sites had also not been subject to fully detailed assessments of capacity and developability.
- 6.2 As set out in section 3 of this topic paper the housing need for Aylesbury Vale was reduced via revisions to the HEDNA and the unmet need was also reduced leading to a requirement of 27,400 dwellings. Taking into account the NPPF requirement to ensure flexibility in paragraph 14 a buffer of 5.2% is being added on in the proposed submission VALP leading to an overall requirement of 28,830 dwellings. The capacity of the suitable sites in the HELAA was 26,872 dwellings to which must be added 4,923 completions between 2013 and 2017 giving a total capacity of 31,795 which is 2,965 greater than the requirement.
- 6.3 There was therefore a need to refine site selection beyond the availability in the HEDNA to match the housing requirement. At the same time that this was being undertaken it was announced in December 2016 that RAF Halton a major RAF training facility was to close in 2022 thus releasing a brownfield site with significant potential capacity for later in the plan period. Another factor in the site selection process was the level of commitments in place which March 2017 amounted to 9,948 dwellings meaning that 14,871 dwellings or 51.6% of the required capacity was already built or committed. Adding in the expected level of windfalls, as allowed under paragraph 48 of the NPPF, of 962 dwellings means that expected capacity is 15,833 or 54.9% of the overall VALP housing requirement leaving capacity for 12,997 dwellings to be identified.
- 6.4 As set out in paragraph 182 of the NPPF local planning authorities must submit a plan which is believed to be sound for examination. In relation to the selection of housing sites the soundness test require that: a plan strategy will meet objectively assessed development requirements including reasonable unmet requirements from neighbouring authorities; the plan should be the most appropriate strategy against reasonable alternatives and proportionate evidence; the plan is based on effective cross boundary working on strategic priorities and the plan should deliver sustainable development in accordance with the NPPF.
- 6.5 Plans also have to meet legal and procedural requirements including the production of a Sustainability Appraisal as referred to in paragraph 165 of the NPPF. The NPPF also sets out requirements for a range of evidence such as a Strategic Flood Risk Assessment and a Habitat Regulations Assessment, which

must be prepared to support a local plan. This planning policy is amplified by the Government's Planning Practice Guidance (PPG). In relation to the Sustainability Appraisal (SA) the PPG indicates that its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The PPG also indicates that the sustainability appraisal should be applied as an iterative process informing the development of the Local Plan. The PPG sets out a flowchart alongside the plan preparation process to indicate the required steps.

- 6.6 Before a local plan is finalised for submission the local plan's options and reasonable alternatives should be defined and then the likely effects of the local plan and alternatives should be evaluated including whether any adverse impacts can be minimised and benefits maximised. An environmental report must then be published alongside a local plan at submission setting out how the SA has been undertaken and its conclusions. The content of the report is an important element in determining the final form of the local plan, but it is not the only determinant of what is appropriate. For example the extraction of a much needed mineral by excavation in a valued landscape would appear to be unsustainable but if it is the only location where the mineral can be found the extraction must proceed.
- 6.7 As well as the sustainability appraisal a wide range of evidence must be drawn on to determine the content of a submission local plan and ensure that it is sound and these requirements are set out in the NPPF and the PPG. The evidence documents prepared by or on behalf of the council are set out on the council's website and those relevant to housing are listed in paragraph 1.4 of this topic paper. Many of them are pivotal to the selection of sites to meet the development requirements that the VALP must address. For example the Strategic Flood Risk Assessment referred to in paragraph 100 of the NPPF enables sites to be selected which will "avoid where possible flood risk to people and property and manage any residual risk".

The approach to site selection

- 6.8 The initial approach to site selection is already set out in section 2 of this topic paper. Following production of the draft VALP, the revision to the housing figures referred to in section 3 of this topic paper and the production of relevant evidence referred to above the council has sought to select the sites for inclusion in the local plan that will most closely reflect the strategic direction of the local plan, the sustainability appraisal, the content of the evidence and individual site characteristics.
- 6.9 The suitability of specific sites were re-checked for any updates on sites that have had the scrutiny of planning applications plus further information sent in by site promoters since HELAA. Developers or site promoters were then contacted about the sites still being promoted for latest details about their sites and to obtain confirmation of site availability and delivery assumptions relating to their sites. This was followed by internal workshops which were held throughout summer 2017 involving internal consultees and input from selected external consultees such as the County Council who gave more detailed feedback on sites particularly in relation to highways matters. The situation on neighbourhood plans was also kept up to date as they emerged and developed

up to the production of the submission VALP.

- 6.10 Specific evidence inputs were also taken into the site selection process. This included: the scoring of sites against SA objectives from within the SA; further detailed landscape assessment so that site areas that have more adverse landscape impacts could be excluded from consideration; all forms of flood risk including climate change including mitigation; cumulative impact (Aylesbury Garden Town area) against a wider set of considerations than HELAA or SA; the implications of the Infrastructure Delivery Plan (including transport) for potential development sites; emerging Aylesbury Garden Town site infrastructure requirements; the Water Cycle Study which was not site specific but does identify the impact on water services infrastructure; and the Sequential Test on flood risk which contains sequential and exception testing to meet the requirements of the NPPF.
- 6.11 Alongside these specific examples of the input from the evidence base in relation to site selection the Settlement Hierarchy was used to establish the strategic role of a settlement in relation to the potential for development. Reserve sites in made neighbourhood plans were also allocated for development in the VALP whilst sites in submitted neighbourhood plans were included as allocations with the potential to revise their status once a neighbourhood plan was made. From the workshops and evidence scrutiny above, consider which are the better sites where there are options available i.e. those which score well in evidence, are best related in settlement pattern and that offer infrastructure benefits. This led to specific criteria being included in policies for sites.
- 6.12 Alongside this site specific work consideration was also given in the selection of sites to their relationship to the objectives and overall strategy of the local plan as well as the implications of cross border relationships with adjacent councils. Objective 4 of the submission VALP states that development will be allocated in accordance with the settlement hierarchy taking a capacity led approach and that the main focus of development will be in sustainable locations at Aylesbury Garden Town. The remainder of housing will then be located in the next most sustainable locations, the other strategic settlements of Buckingham, Haddenham, Winslow and Wendover, together with a appropriate level of development at the most sustainable settlements in the rural areas.
- 6.13 The cross border relationship with adjacent councils is strongest with Wycombe, Chiltern and South Bucks which is evidenced by the acceptance of unmet need from those councils. Apart from those very strong connections other strong connections are also evident in relation to Milton Keynes and Central Bedfordshire however neither of those councils requires any of their housing need to be met within Aylesbury Vale. None of the other four adjacent councils have strong cross border relationships with Aylesbury Vale. The result of these relationships is to focus attention on meeting unmet need as close as possible to its source in the south of Aylesbury Vale.
- 6.14 Taking all of the above matters into account it is considered that the sites selected for housing development in the VALP has accorded with the content of evidence, the implications of the strategic cross border relationships, the outcome of the SA and the requirements of the NPPF.

- 6.15 In the response to the draft VALP there were significant concerns at the implications of the high level of growth and its distribution, however these have been addressed through a change in approach to a capacity based one and the reduction in the housing figures. Concerns expressed about the potential Green Belt allocation at Wendover have been addressed by the deletion of the suggested site and its replacement by RAF Halton. Concerns expressed by the County Council at the lack of a focus on the south of the district to reflect the pressure from unmet needs and distribution of housing across the district to smaller settlements have also been addressed by the balance of development being directed towards the south of the district and the increased focus on development at Aylesbury Vale's strategic settlements, particularly Aylesbury.

7 Conclusions

- 7.1 The aim of preparing a local plan is best served by following the legal requirements and the relevant Government planning policies supported by a proportional evidence base. A plan's preparation must also accord with the Duty to Cooperate. In relation to the matters covered in this topic paper the council has followed the requirements of Government planning policy and associated guidance in the preparation of the land availability assessment (HELAA) particularly in relation to the Duty by adopting a coordinated approach with the three other councils in the best fit HMA.
- 7.2 The generation of the housing market area (HMA) and the housing need (HEDNA) evidence has also followed the requirements of Government planning policy and associated guidance. It has also been the subject of consultation and updating to reflect changing circumstances. Once again a coordinated approach between the four Bucks councils has helped to ensure that the Duty to Cooperate is met with agreement over levels of unmet housing need to be met in Aylesbury Vale being particularly significant. Importantly the Government's new approach to determining housing need will not apply to the VALP provided it is submitted before the end of March 2018.
- 7.3 The approaches to affordable housing and meeting other housing needs have also met the requirements of Government planning policy and associated guidance through the HEDNA and the policies and proposals in the proposed submission VALP. Meeting the Duty to Cooperate has also been contributed to by the joint preparation of evidence on these matters in the Buckinghamshire HEDNA.
- 7.4 Finally the selection of the sites for development has been based on the HELAA referred to above and on specific detailed evidence on such matters as flood risk. This has then been refined through further detailed consideration of the suitable sites in the context of the objectives and strategy of the VALP. This process has been assisted by the development of the Sustainability appraisal alongside the local plan.
- 7.5 It is therefore considered that the overall matter of housing has been dealt with in accordance with legal requirements and the relevant Government planning policies, and is supported by a proportional evidence base. The overall process has also been a fundamental part of work to meet the Duty to Cooperate. It is therefore considered that housing element of the local plan will allow the local plan to be found sound and be in accord with legal requirements.