

1. PURPOSE OF THE INTERIM STATEMENT

- 1.1. This position statement (“The Interim Statement”) sets out the Council’s approach to affordable housing requirements ahead of the adoption of the Vale of Aylesbury Local Plan.
- 1.2. This Interim Statement updates the previously published Affordable Housing Policy Interim Position Statement of June 2014 and follows changes introduced by the new National Planning Policy Framework (2018-2019). This Interim Statement comes in with immediate effect as the preferred approach for discussions on planning applications involving affordable housing.
- 1.3. The Interim Statement should be read alongside the Aylesbury Vale District Local Plan 2004 (AVDLP) and the AVDC Affordable Housing SPD (Nov 2007).
- 1.4. The Council has set out proposed policies and land allocations in the draft Vale of Aylesbury Local Plan (VALP). The draft VALP was published and subject to public consultation in summer 2016. The proposed submission was the subject of consultation from, 2 November to 14 December 2017. The draft VALP and supporting documents were then submitted for examination at the end of February 2018. The examination hearing ran from Tuesday 10 July 2018 to Friday 20 July 2018 and Interim Findings have been set out by the Inspector. Consultation on modifications is taking place in November and December 2019 and the adoption of the VALP is expected to be in early 2020.
- 1.5. In preparation for the VALP, evidence was gathered regarding affordable housing in the Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA) (2016). This was followed by the Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA) Update Addendum (2017). This evidence document demonstrates the most up to date and robust information about affordable housing in the Vale and will therefore be a material consideration in determining planning applications.
- 1.6. This Interim Statement sets out the position to be taken by the Council on affordable housing in the interim period until the VALP is adopted.

2. THE NPPF & PPG GUIDANCE SUMMARY

- 2.1. The Government published a new version of the National Planning Policy Framework (NPPF) in July 2018, which was further updated in February 2019.
- 2.2. The NPPF and guidance around it have outlined various policy changes that have required this Interim Statement.

2.3. The updated NPPF provides clear policy that provision of affordable housing on all major development sites (sites of 10 dwellings or more, or over 0.5ha) is expected. Other relevant changes are:

- The definition of affordable housing has also been expanded and updated to include Affordable Private Rent as part of a Build to Rent Scheme.
- For major development sites at least 10% affordable home ownership should be provided. However, exemptions to this 10% requirement may be made where the proposed developments meet certain requirements, as laid out in the NPPF.
- Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). It is worth noting that there are currently no designated rural areas in the Vale.

2.4. National policy also provides an incentive for brownfield development on sites containing vacant buildings. Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial Vacant Building Credit equivalent to the existing gross floor space of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Additional affordable housing contributions may be required for any increase in floor space.

3. AVDC'S POSITION ON AFFORDABLE HOUSING

3.1. AVDC has emerging policy as set out in the Vale of Aylesbury Local Plan (Affordable Housing - Policies H1 & H2).

3.2. In the intervening period prior to the adoption of VALP and the accompanying Affordable Housing SPD, the approach to current AVDLP policies will be as below:

- AVDLP Policy GP2 remains the development plan policy basis for seeking the provision of affordable housing on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified through open book calculations and viability evidence. This will need to be verified by at least one independent consultant at the expense of the applicant.
- AVDLP Policy GP3 (relating to low cost market housing) is out of date and will not be given weight

Therefore, The Council's expectation for 30% affordable housing on schemes of 25 or more dwellings or sites of one hectare or more as set out in AVDLP remains current.

3.3. In addition to the approach set forth in 3.2 above, there currently exist made Neighbourhood Plan policies in some areas which either quote greater percentages or

lower thresholds for affordable housing. The content of those policies will need to be evaluated on a case by case basis and may entail a departure from AVDLP GP2.

3.4. In order to address Para 64 of the NPPF, AVDC will apply 10% affordable home ownership to sites of 10-24 dwellings or 0.5-0.99 hectares. However, applying 10% affordable home ownership to larger sites would result in a reduced number of properties for affordable rent. This would significantly prejudice AVDC's ability to meet the housing needs of those requiring affordable rented properties and it is therefore not deemed appropriate to apply the 10% to sites of 25 or more dwellings or sites of one hectare or more but to continue to apply our current tenure split of 75% affordable rented, 25% shared ownership in order to address the needs of those requiring affordable rented housing.

Development Size	Affordable Housing Requirement
Below 10 dwellings or below 1,000 sqms (gross internal area)	No requirement
10 -24 dwellings, or 0.5-0.999 hectares	At least 10% affordable home ownership Shared ownership is preferred
25 or more dwellings or 1 hectare and above	30% affordable housing with a tenure split of 75% affordable rent and 25% shared ownership

3.5. In reference to built to rent, there is no current policy and consequently, AVDC will use the 20% affordable housing requirement figure as set out in the PPG. This percentage indicates the suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme. This will be applied on build to rent schemes classified as major development sites (10 or more dwellings, or over 0.5 hectares).

3.6. A variety of housing types and sizes is necessary to meet the needs of the local population to enable households to more easily find housing which suits their needs and that they can afford. The Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA) Update Addendum (2017) provides conclusions on the required mix of market and affordable housing need by house type and size. These conclusions take into account projected changes in the population and estimates future demand. The proportions are a guide rather than a requirement as they may need to be varied on the basis of specific circumstances or evidence. Any variation in the proportions will need to be fully justified and variations should not take place to simply accord with a developer's preferences.

Affordable Housing - Housing Types		Affordable Housing Requirement
Flats	1 bedroom	9%
	2 bedroom	6%
Houses	2 bedroom	37%
	3 bedroom	39%
	4 bedroom	9%

- 3.7. Vacant building credit should only be applied where buildings have not been abandoned, but have been vacated. The courts have held that, in deciding whether a use has been abandoned, account should be taken of all relevant circumstances, such as: the condition of the property, the period of non-use, whether there is an intervening use; and any evidence regarding the owner's intention. Each case put forward is a matter for the Council to judge. In considering how the vacant building credit should apply to a particular development, local planning authorities should have regard to the intention of national policy. In doing so, the council will need to consider:
- whether the building has been made vacant for the sole purposes of re-development
 - whether the building is covered by an extant or recently expired planning permission for the same or substantially the same development
 - whether the building is only partially vacant

Calculation of the vacant building credit

$(\text{Net change in Floor space} / \text{Proposed Floor space}) * \text{Policy Requirement} = \text{Site Affordable Housing Requirement}$

Worked example:

Existing gross floor space: 10,000 sq. m

Policy affordable housing requirement: 30%

Proposed development: 352 dwellings with a total floor space of 30,000 sq. m (representing an average dwelling size of 85 sq. m)

The difference between the existing gross floor space (vacant buildings on site) and the proposed new build floor space is 20,000 sq. m i.e. the proposed development would result in 20,000 sq. m more of development in this example.

On this basis the Affordable Housing Contribution is $(20,000 / 30,000) * 30\% = 20\%$

Rather than a requirement of 106 (30%) affordable units the requirement is reduced to 70