

Affordable Housing Statement

Land at SWMK



Affordable Housing Statement

Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid reserved; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure

Land at SWMK

SWMK consortium

March 2021

LPA REF: 15/00314/AOP

OUR REF: M20/0403-01.RPT

TETLOW KING PLANNING
UNIT 2, ECLIPSE OFFICE PARK, HIGH STREET, STAPLE HILL, BRISTOL, BS16 5EL
Tel: 0117 9561916 Email: all@tetlow-king.co.uk



Contents

| Section 1 | Introduction | 1 |
|-----------|--|----|
| Section 2 | The Development Plan and Related Policies | 2 |
| Section 3 | Affordable Housing Needs and Past Delivery | 8 |
| Section 4 | Affordability Indicators | 12 |
| Section 5 | Conclusions | 18 |



Introduction

Section 1

- 1.1 Tetlow King Planning are instructed by the SWMK consortium to examine the affordable housing sector within Buckinghamshire Council in relation to their proposed development on land at SWMK.
- 1.2 The proposed development is for up to 1,855 dwellings, of which 30% (up to 567 dwellings) are to be provided as affordable housing. This accords with the requirements of Aylesbury Vale Local Plan Policy GP2.
- 1.3 Providing a significant boost in the delivery of housing is a key priority of the Government's National Planning Policy Framework. Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.
- 1.4 Given the identified needs for affordable housing, the proposal is considered to provide significant community benefits which are a strong material consideration in favour of the development.
- 1.5 This statement comprises five sections:
 - Section 2 reviews relevant Development Plan policies and other material considerations relevant to the site:
 - Section 3 provides analysis of affordable housing needs and delivery performance;
 - Section 4 sets out a range of affordability indicators; and
 - Section 5 provides our conclusions.

Introduction 1



The Development Plan and Related Policies

Section 2

Introduction

- 2.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications should be determined in accordance with the Development Plan unless material consideration indicate otherwise.
- 2.2 The Development Plan for Buckinghamshire Council comprises the Aylesbury Vale District Local Plan (2004), the Chiltern Local Plan (1997), the Chiltern Core Strategy (2011), the South Bucks Local Plan (1999), the South Bucks Core Strategy (2011), the Wycombe District Local Plan (2019) and the Wycombe Delivery and Site Allocations Plan (2013).
- 2.3 The Aylesbury Vale District Local Plan (2004) is the relevant Section 38(6) document within the Buckinghamshire Development Plan for this application.
- 2.4 Other material considerations include the Affordable Housing Interim Position Statement (November 2019), the Affordable Housing Supplementary Planning Document (2007), the NPPF (2019), the PPG and the emerging Vale of Aylesbury Local Plan 2013-2033.

The Development Plan

Aylesbury Vale District Local Plan (2004)

- 2.5 The Aylesbury Vale District Local Plan is the part of the wider Buckinghamshire Council Development Plan that is of particular relevance to the proposed site.
- 2.6 The Aylesbury Vale District Local Plan was adopted by the Council in January 2004 and sought to guide development until 2011. Under the transitional arrangements some of the policies were saved to provide ongoing local policy upon which to base planning decisions until such time that they are replaced by the relevant Development Plan Policies.
- 2.7 Chapter 1 sets out the main features of the Aylesbury Vale District Local Plan (AVDLP), which includes "provision for affordable homes".



- 2.8 Paragraph 4.4 of the AVDLP notes that the Housing Needs Study undertaken for the Council in 1999 gave a strong indication that a considerable affordability problem may arise in the district from the relationship between local income levels and the supply of average and below average priced properties.
- 2.9 At paragraph 4.6 it recognises that as part of this study of housing need, the results of a large sample survey indicated that there were many 'concealed households' living as part of an existing household.
- 2.10 By way of context the plan reveals at paragraph 4.9 that the 1999 Housing Needs Study identified a need for 2,000 affordable units by 2006, equivalent to 286 affordable dwellings per annum, just to maintain the priority waiting list at its current level. It expressly acknowledges that "this need for affordable dwellings is a material planning consideration". The housing need study has been superseded by Buckinghamshire Housing and Economic Development Needs Assessment Update (2017) and the requirement identified in the Emerging Vale of Aylesbury Local Plan 2013-2033.
- 2.11 The Council's affordable housing requirements are detailed under Saved Policy GP2 as follows:

"The Council will negotiate for the provision as affordable dwellings of a minimum of 20% and up to 30% of the total number of dwellings on developments of 25 or more dwellings, or sites of 1 hectare or more (or which form part of a site of such a size which is capable or development), regardless of the number of dwellings.

The Council will assess the circumstances of each proposed development individually. It will take into account in particular the need locally for affordable dwellings (including evidence from the Councils Housing Needs Survey), the economics of development (including the cost of any contributions towards the achievement of any other planning objectives also being sought from the development of the site), Government guidance and sustainability considerations.

The Council will wish to ensure that the affordable dwellings are occupied initially by 'qualifying persons' and are retained for successive 'qualifying persons'.

2.12 Saved Policy GP3 requires an additional 10% provision of local cost market housing.



Other Material Considerations

Affordable Housing Policy Interim Position Statement (November 2019)

- 2.13 The Interim Position Statement (IPS) sets out the Council's approach to affordable housing requirements. It updates the previously published Affordable Housing Policy Interim Position Statement of June 2014 and follows changes introduced by the NPPF. It sets out the Council's preferred approach for discussions on affordable housing.
- 2.14 The Council's position at paragraph 3.1 of the IPS is based upon emerging policy in the Vale of Aylesbury Local Plan (Affordable Housing Policies H1 and H2). In the intervening period prior to the adoption of the Vale of Aylesbury Local Plan (VALP) and the accompanying Affordable Housing SPD the approach is detailed at paragraph 3.2 as follows:
 - AVDLP Policy G2 remains the development plan policy basis for seeking the
 provision of affordable housing on site, unless off-site provision of 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 (related 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 site of one hectare or more as set out in AVDLP remains current.
- 2.15 Paragraph 3.4 explains that on sites of 25 or more dwellings the Council will continue to apply the tenure split of 75% affordable rented and 25% shared ownership.
- 2.16 The IPS goes on at paragraph 3.6 to illustrate the Council's preferred mix as shown in figure 2.1.

Figure 2.1: Preferred Affordable Housing Mix

| House Type | Bedrooms | Affordable Housing Requirement |
|------------|------------|--------------------------------|
| Flats | 1 bedroom | 9% |
| | 2 bedrooms | 6% |
| Houses | 2 bedrooms | 37% |
| | 3 bedrooms | 39% |
| | 4 bedrooms | 9% |

Source: Affordable Housing Interim Position Statement (November 2019)



Emerging Vale of Aylesbury Local Plan 2013-2033

- 2.17 Following a Main Modifications consultation in December 2019, the Council subsequently prepared further modifications (based on both updated information and the issues raised in the December 2019 consultation) which went to public consultation between 15 December 2020 and 9 February 2021.
- 2.18 Chapter five deals with housing. Paragraph 5.4 explains that as a result of meeting housing need from adjacent councils which cannot meet their need in their own areas, Aylesbury Vale will also need to deliver a suitable proportion of affordable housing to address transferred affordable housing need within the overall unmet need.
- 2.19 At paragraph 5.5, the emerging Plan records that the Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA) identifies an affordable housing need of 4,200 dwellings during the Plan period. It then goes on to explain that the Councils will seek 25% affordable housing from qualifying schemes and when allowing for 25% affordable housing on the entire housing figure for the Plan, "a total of 6,850 additional affordable homes must be provided in the district in the Plan period".
- 2.20 Emerging Policy H1: Affordable Housing, is as follows:

H1 Affordable housing

Residential developments of 11 or more dwellings gross or sites of 0.3ha or more will be required to provide a minimum of 25% affordable homes on site <u>except where a different requirement already applies in a neighbourhood plan which has been made before the adoption of VALP</u>. In addition:

- a. The type, size, tenure and location of affordable housing will be agreed with the Council the council, taking account of the Council the council on housing need and any available evidence regarding local market conditions.
- b. Where an applicant advises that a proposal is unviable in the light of the above policy requirement, other policy requirements, specific site characteristics and other financial factors, an independently assessed* open book financial appraisal of the development should be provided by the applicant which will then be independently assessed at the expense of the applicant.
- c. Exceptionally affordable housing provision may be provided off-site or a financial contribution made in lieu of such provision. This will need to be justified as an exception to normal policy as part of the planning application.
- d. Where a site forms part of a larger site of a size which is capable of being developed, the affordable housing requirements will be applied on a cumulative basis.
- <u>e.</u> The affordable homes will be expected to be integrated throughout the development site in accordance with the adopted Supplementary Planning Document.
- e.f. Where the affordable housing policy would result in a requirement that more than half of an affordable home should be provided, the calculation will be rounded upwards and where it would be less than 0.5 a financial contribution of equivalent value may be sought.

Further details regarding the implementation of this policy will be provided in the Affordable Housing Supplementary Planning DocumentSPD.

*the independent consultant who will assess the financial appraisal will be chosen by the Councilthe council.



Sustainable Community Strategy for Aylesbury Vale 2009-2026

- 2.21 The Sustainable Community Strategy (SCS) acknowledges that "the lack of affordable housing means that families and communities may be separated".
- 2.22 It identifies a series of key challenges which includes the need to support communities, especially with affordable homes. The SCS has five broad themes, each of which has a series of key outcomes.
- 2.23 Amongst the key outcomes of the Health and Wellbeing theme is the aim to *"reduce homelessness"*.

Housing and Homelessness Strategy 2019-2022

- 2.24 The foreword by Councillor Mark Winn, Cabinet Member for Communities, makes clear that "to have a secure and safe home is the bedrock of any modern society and the basis on which we can live and operate as individuals".
- 2.25 He goes on to explain that in order for the Vale to become a great place to live and work "we must address our own homeless population" and that "it will not come as a surprise that the main focus of this strategy is weighted around prevention and securing affordable long term housing".
- 2.26 At paragraph 5.1.4 the Strategy sets out that households aspiring to a very modest semi-detached or detached house would need incomes of £64,103 and £93,671 respectively based on 3.5 times income multiples.
- 2.27 In addition to having a good income, households would also require an average deposit of 21% and be able to afford the associated legal and moving costs. It notes that whilst home ownership is the most popular form of tenure in the district "Aylesbury Vale continues to be an expensive area in which to buy a home".
- 2.28 Paragraph 5.2 explains that the number of applicants accepted as unintentionally homeless and in priority need and therefore owed a homeless duty has risen 25% between 2013 and 2017 and 68% of these had dependent children.
- 2.29 The Strategy has four strategic priorities. Strategic Priority 2 is to continue to facilitate and maximise the supply of affordable housing which acknowledges that "the demand for affordable homes is still growing and delivery remains challenging".
- 2.30 It identifies that "scheme viability is often challenged on S106 sites, which in our district supply the majority of new homes" with the outcome that "this has resulted in reduced numbers of affordable housing on some sites".



2.31 The accompanying action plan at paragraph 9.2 recommends an increase in the supply of new affordable homes with the aim to develop ye highest level of affordable homes possible in accordance with the relevant national and local planning policies.

Summary

- 2.32 The adopted Development Plan in Aylesbury Vale consists of the Saved Policies of the 2004 Aylesbury Vale District Local Plan which seeks a target of between 20% and 30% affordable housing across the district.
- 2.33 Emerging Policy H1 of the VALP proposes a 25% requirement for affordable housing provision from qualifying sites and identifies an overall need for additional 6,850 affordable homes over the 20 year Plan period, equivalent to 343 per annum on average.
- 2.34 This section clearly highlights that within adopted policy and a range of other plans and strategies, providing affordable housing has been long established as, and remains, a key priority for the Aylesbury Vale area of Buckinghamshire Council.



Affordable Housing Needs and Past Delivery

Section 3

Buckinghamshire Housing and Economic Development Needs Assessment Update (2017)

3.1 The HEDNA Update of September 2017 identifies a need for at least 4,200 affordable homes across the Plan period with an 83:17 tenure split in favour of affordable rented accommodation.

Emerging Vale of Aylesbury Local Plan 2013-2033

- 3.2 The Inspectors Interim Findings of 27 August 2018 set out at paragraph 18 that the uplift to address affordability issues in the VALP was too low.
- 3.3 At paragraph 20 the Inspector went on to explain that the LPEG Report to the Communities Secretary and to the Minister of Housing and Planning (March 2016) offered recommended systematic adjustments for market signals to replace the system of professional judgement used at other local plan examinations hitherto. They found that application of this methodology would set a 25% uplift for market signals in Aylesbury Vale.
- 3.4 Paragraph 26 of the Inspector's Interim Findings detailed their conclusions that there needs to be a higher uplift to the baseline housing need taking account of market signals and that this should be at least 20% and probably 25%.
- 3.5 ORS on behalf of the Council responded to the Inspectors Interim Findings in September 2018 challenging the 25% uplift figure.
- 3.6 On 2 December 2018 the Inspector provided a note in response to ORS's challenge to the 25% uplift figure and clarified that whilst the uplift is a matter for judgement he was content for the Council, in the first instance, to suggest an appropriate figure. However, he went on to say his view remained as stated in paragraph 26 of his Interim Findings.
- 3.7 In February 2019 ORS provided a further response to the Inspector where they proposed a 17% uplift at paragraph 59 as a midpoint between the 15% uplift and the



- maximum of the Inspector's range making a reasonable allowance for the 'policy on' element.
- 3.8 On 4 March 2019 the Inspector issued a response to the Council's reply which explained that the work commissioned from ORS covered the ground he had asked to be covered and represented the most up to date expert analysis available so the Council should prepare modifications to the plan based on that advice.
- 3.9 Taking into account the findings of the HEDNA, the emerging Plan identifies an overall need for 6,850 net affordable homes over the 20 year Plan period, equivalent to 343 net per annum on average.

Past Delivery of Affordable Housing in Aylesbury Vale

3.10 Figure 3.1 below utilises data from the Council's Housing Land Assessment reports and illustrates the past performance of housing and affordable housing in Aylesbury Vale in the period between 2008/09 and 2019/20. Across this period there has been a total of -3,945 gross affordable housing completions, equivalent to an annual average of 303 (gross).

Figure 3.1: Past Affordable Housing Delivery in Aylesbury Vale

| Year | Total Number of New Homes Built (Gross) | Number of Affordable Homes Delivered (Gross) |
|---------|--|---|
| 2008/09 | 787 | 366 |
| 2009/10 | 834 | 423 |
| 2010/11 | 783 | 241 |
| 2011/12 | 1,137 | 439 |
| 2012/13 | 967 | 361 |
| 2013/14 | 1,018 | 253 |
| 2014/15 | 1,454 | 429 |
| 2015/16 | 1,241 | 227 |
| 2016/17 | 1,353 | 245 |
| 2017/18 | 1,459 | 324 |
| 2018/19 | 1,797 | 330 |
| 2019/20 | 1,754 | 307 |
| Totals | 14,584 | 3,945 |

Source: Housing Land Assessments 2009 - 2020



- 3.11 Gross affordable housing completions fail to take account of any losses to stock through demolitions or sales through Right to Buy, Preserved Right to Buy or the Right to Acquire.
- 3.12 As such the figure of 3,945 affordable housing completions does not present the true picture as in reality the net figure is likely to be considerably lower as a result of losses to stock through demolitions and sales.
- 3.13 Although Right to Buy data is not available for the period after 2006/07 in Aylesbury Vale, in the period between its introduction in 1980 and 2006/7 some 6,481 affordable homes were lost from stock as a result of the Right to Buy, equivalent to an average of 249 every year.
- 3.14 At a national level almost two million households have exercised their Right to Buy since it was introduced in 1980. In July 2015 the Conservative Government published 'Fixing the Foundations: Creating a More Prosperous Nation' which confirms that the Government is committed to extending the Right to Buy to housing association tenants, noting that "since the Right to Buy for council tenants was reinvigorated in the last Parliament, the number of sales has increased by nearly 320%".
- 3.15 The Government undertook a Voluntary Right to Buy pilot scheme with a limited number of RPs in a limited area in 2016/17. In the Government's Autumn Statement, the Chancellor Philip Hammond, outlined that there would be a large-scale regional pilot scheme of Right to Buy for housing association tenants in the West Midlands. In May 2018 the Government published guidance on the voluntary Right to Buy Midlands pilot although details of when the pilot scheme will be launched remain unavailable. In September 2019, the housing secretary Mr Robert Jenrick, introduced new plans for housing association tenants to have the right to purchase a share in the equity of their property.
- 3.16 The extension of Right to Buy to Housing Association tenants is likely to further increase the loss of existing affordable housing stock, putting increasing pressure on the need to deliver more affordable homes in Buckinghamshire Council's administrative area in the future.

Comparative Analysis of Delivery Against the Emerging Plan Target

3.17 The HEDNA sets a base date of 2013. The emerging Plan takes into account the findings of the HEDNA and identifies an overall need for 6,850 net affordable homes over the 20 year Plan period, equivalent to 343 net per annum on average.



3.18 Comparative analysis of gross completions since 2013 show that a shortfall of -286 affordable homes has already arisen as illustrated by figure 3.2 below utilising data taken from the Council's own Housing Land Assessment monitoring reports.

Figure 3.2: Affordable Housing Delivery Compared to Emerging Plan Target

| Year | Emerging Plan Affordable Housing Target (Net) | Number of Affordable Homes Delivered (Gross) | Difference |
|---------|---|--|------------|
| 2013/14 | 343 | 253 | -90 |
| 2014/15 | 343 | 429 | +86 |
| 2015/16 | 343 | 227 | -116 |
| 2016/17 | 343 | 245 | -98 |
| 2017/18 | 343 | 324 | -19 |
| 2018/19 | 343 | 330 | -13 |
| 2019/20 | 343 | 307 | -36 |
| Totals | 2,401 | 2,115 | -286 |

Source: Housing Land Assessments 2014 - 2020; Emerging VALP

3.19 It is important to note however that this is not a like for like comparison as the Emerging Plan identifies a net requirement and the Council only records gross affordable housing completions. As such the actual shortfall in delivery against the plan target is likely to be considerably higher than that set out in figure 3.2.

Conclusions on Affordable Housing Needs and Past Delivery

- 3.20 There is an acute need for affordable homes in Aylesbury Vale, and Buckinghamshire Council, with the emerging VALP identifying a need for at least 343 net affordable homes per annum between 2013 and 2033.
- 3.21 There has been a shortfall in delivery against this target of -286 affordable homes in the space of seven years, which is based upon gross completions fails to take account of losses to stock. In reality the shortfall is likely to be considerably higher once demolitions and Right to Buy, Preserved Right to Buy and Right to Acquire sales are taken into account.
- 3.22 In light of the identified level of need there can be no doubt that the delivery of affordable housing on the proposed site will make an important contribution to the affordable housing needs of Aylesbury Vale, and Buckinghamshire Council.



Affordability Indicators

Section 4

Market Signals

- 4.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability in the context of Plan making.
- 4.2 Aylesbury Vale District Council was absorbed into the new unitary Buckinghamshire Council on 1 April 2020. Indicator data is therefore presented for Aylesbury Vale from 2013/14 until most recently available, in addition to the latest indicators for Buckinghamshire.

Average Affordability Ratio

4.3 The National Housing Federation (NHF) Home Truths report shows that in the period between 2013/14 and 2018/19 the average house price to average income ratio within the district increased from 9.1 to 11.6 which represents a 27% increase in six years.

Lower Quartile Affordability Ratio

4.4 For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the situation is even worse. The lower quartile house price to incomes ratio in Aylesbury Vale has increased by 34% from 8.54 in 2013/14 to 11.78 in 2019/20 as illustrated by figure 4.1 below.



Figure 4.1: Lower Quartile House Price to Income Ratio in Aylesbury Vale

Source: ONS - Ratio of lower quartile house prices to lower quartile gross annual workplace-based earnings, Table 6c

4.5 The latest Office for National Statistics (ONS) lower quartile affordability ratio data published on 25 March 2021 reports a lower quartile house price to income ratio of 11.60 in Buckinghamshire in 2020/21.

House Prices

- 4.6 Over the period between 2013/14 and 2018/19 the NHF report an average house price increase of 37%, rising from £272,820 to £375,066, this has resulted in the income required to purchase an average priced home in the district with an 80% mortgage rising from £62,359 to £85,729 in the space of just six years.
- 4.7 By way of comparison, average earnings in the district saw an increase of just 8% from £29,947 to £32,360 over the same period.
- 4.8 Median house price data shows that in Aylesbury Vale prices consistently exceed both the national and regional average with a 40% increase within the district between 2013/14 and 2018/19 compared to 35% regionally and 26% nationally as shown at figure 4.2 below.



450000 400000 350000 300000 250000 200000 150000 100000 50000 0 2013/14 2014/15 2015/16 2016/17 2017/18 2018/19 2019/20

Figure 4.2: Median House Prices

Source: HPSSA Dataset 9

Aylesbury Vale —

4.9 The median house price in Buckinghamshire in 2019/20 was £395,000; 22% higher than the regional value of £325,000 and 60% higher than the national value of £247,000.

Buckinghamshire

South East

Private Rental Market

- 4.10 The picture for renters in Aylesbury Vale is not much better with the NHF reporting that average monthly rents increased 16% from £790 pcm to £918 pcm between 2013/14 and 2018/19.
- 4.11 Data provided by the Valuation Office Agency (VOA) and the ONS indicates that in Aylesbury Vale average private rents increased by 18% between 2013/14 and 2019/20 from £805 pcm to £952 pcm, outstripping the national average of 14%.
- 4.12 The situation is even worse in the lower quartile private rental sector where VOA data indicates that rents have increased by 20% over the same period from £625 pcm to £750 pcm, which is much higher than the national rate of increase of 16%.



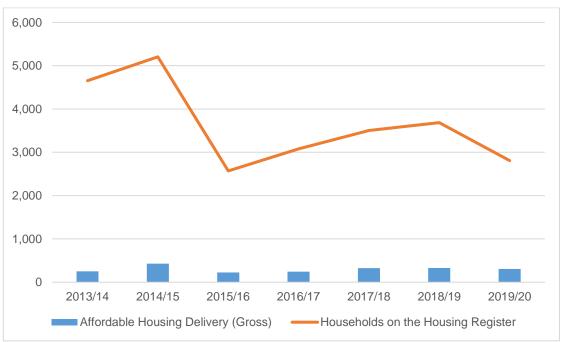
Homelessness

- 4.13 Contrary to a decrease in percentage terms in homelessness both nationally (down 48%) and regionally (down 20%) between 2013/14 and 2018/19, within Aylesbury Vale there has been a 5% increase in homelessness over the same period.
- 4.14 The increasing house prices, private rents and failure of affordable housing delivery to keep pace with identified demand will have all played a role in this starkly different picture within the district compared to the region and national position.

Housing Register

4.15 At 31 March 2020 there were a total of 2,096 households on the Council's Housing Register. Figure 4.3 below provides a comparative analysis of the number of households on the Register and gross affordable housing delivery over the period since 2013/14.

Figure 4.3: Comparative Analysis of the Housing Register and Gross Affordable Housing Delivery



Source: Housing Land Assessments 2014 – 2019; CLG Live Table 600

- 4.16 Figure 4.3 demonstrates that affordable housing delivery has persistently fallen substantially short of meeting identified housing needs.
- 4.17 Figure 4.3 also illustrates a significant drop in households on the housing register where the waiting list fell by 24% in one year from 3,686 households in 2018/19 to 2,808 households in 2019/20. In November 2019, Buckinghamshire Council adopted



a new Housing Allocations Policy¹, following changes brought in through the Localism Act 2011 which allowed local authorities to define their own criteria for those who can apply for affordable housing. For many authorities this has meant excluding applicants already on the list who no longer meet their new narrower criteria but who were still in need of affordable housing. Many of these people are forced to meet their housing needs by entering the PRS.

4.18 The ability of Local Authorities to set their own qualification criteria in relation to Housing Registers was recognised by the Planning Inspector presiding over an appeal at Oving Road, Chichester². In assessing the need for affordable housing in the District, and in determining the weight to be attached to the provision of affordable housing for the scheme which sought to provide 100 dwellings; the Inspector acknowledged at paragraph 63 that:

"The provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. Consequently, I attach substantial weight to this element of the proposal" (my emphasis).

- 4.19 A similar view was expressed in the July 2019 decision by the Inspector presiding over an appeal at Dylon International Premises³ in the London Borough of Bromley. Where the Inspector commented at paragraph 33, "Currently, there are some 3,477 households on the Council's, <u>heavily circumscribed</u>, housing waiting list. For those accepted on the waiting list, there is an average wait time of 1.3-years for a one-bed home, 2.7-years for a 2-bed home and 2.6-years for a 3-bed home."
- 4.20 Such an approach does not reduce the need for affordable housing but instead makes it even harder for those unable to access open market housing to find a suitable place to live, with even more at risk of homelessness.

Affordability Indicators

¹ https://www.buckshomechoice.org.uk/choice/uploads/BHCPolicyNov2019.pdf

² Appeal ref: 3165228. Land at the corner of Oving Road and A27, Chichester

³ Appeal ref: 3206569. Land to the rear of the former Dylon International Premises, Station Approach, Lower Sydenham, London



Conclusions on Affordability Indicators

- 4.21 Affordability in the district has been and continues to be, a critical concern. House prices and rent levels in both the average and lower quartile segments of the market are increasing whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in Aylesbury Vale out of the reach of more and more people.
- 4.22 Analysis of market signals is necessary in understanding the affordability of housing. It is clear that there is an acute housing problem in Aylesbury Vale, with an average house price to average income ratio of 11.6 and a lower quartile house price to lower quartile income ratio of 11.78 in 2019/20.
- 4.23 Market signals indicate a worsening trend in affordability in Aylesbury Vale and by any measure of affordability, this is a district in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes. The Local Plan Inspector specifically identified affordability as an issue and through correspondence with the council ensured that an uplift to the housing requirement was adjusted to take account of market signals. Taking into account the findings of the HEDNA, the emerging Plan identifies an overall need for 6,850 net affordable homes over the 20 year Plan period, equivalent to 343 net per annum on average.



Conclusions

Section 5

- 5.1 The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG3 in 1992 and has continued to play an important role in subsequent national planning policy, including the National Planning Policy Framework.
- 5.2 Saved Local Plan Policy GP2 requires the provision of 20-30% affordable housing on qualifying sites, whilst the Council's 2019 Affordable Housing Policy Interim Position Statement seeks 30% affordable provision. The proposed development is compliant in both respects.
- 5.3 There is a range of evidence demonstrating the needs for affordable housing in the district, as a result of which the emerging VALP identifies a target of 343 net affordable homes per annum between 2013 and 2033.
- In the period since 2013 a shortfall of -286 affordable homes has arisen against the emerging VALP target. Critically, this is based upon comparing gross affordable housing completions (as this is all the Council records) against a net target, as such if losses to stock through demolitions and Right to Buy, Preserved Right to Buy and Right to Acquire sales were taken into account then the shortfall is likely to be considerably larger.
- 5.5 A wide array of signals indicates that there is a worsening trend in affordability in Aylesbury Vale. There can be little doubt that this is a district in the midst of an affordable housing crisis, the remedy to which must be to deliver more affordable homes.
- 5.6 The proposal to deliver up to 567 affordable dwellings would make a substantial contribution to the delivery of affordable housing in the district and towards meeting the acute affordable needs of the Aylesbury Vale.

Conclusions 18



5.7 A community's need for affordable housing is integral to the social dimension of the golden thread of sustainable development running through the NPPF. It is highly unlikely that the backlog of need will be met in the foreseeable future. The affordable housing offered should be given very significant weight in the determination of this appeal.

Conclusions 19