

Date: 02 October 2013

**WEST NORTHAMPTONSHIRE
JOINT STRATEGIC PLANNING COMMITTEE**

Representations to the Vale of Aylesbury Plan

REPORT OF THE HEAD OF THE JOINT PLANNING UNIT

1. Background

- 1.1 Aylesbury Vale District Council have recently undertaken a Pre-Submission consultation on their Vale of Aylesbury Plan, which sets out the vision, strategic objectives, and overall jobs and housing figures for the District.
- 1.2 The Joint Planning Unit (on behalf of the Joint Strategic Planning Committee) has been consulted as a neighbouring strategic planning authority.
- 1.3 Under normal circumstances the JPU, on behalf of the Joint Strategic Planning Committee, does not make formal comments, other than to note the plan. In this particular instance the numbers being promoted in the plan appear to be too low, and could therefore lead to the expectation of partner Councils meeting displaced need, even though this has not been formally requested under the Duty to Co-operate provisions.
- 1.4 The JPU has therefore submitted an officer objection to the Vale of Aylesbury plan. This report sets out details of the officer objection and the reasons for it.
- 1.5 The Joint Planning Unit has subsequently been notified that the Vale of Aylesbury Plan was submitted to the Government on Monday 12th August, for an independent examination.

2. Recommendations

- 2.1 That Committee confirms the objection to the Vale of Aylesbury Plan, submitted on its behalf by officers, and determine whether they wish officers to make oral representations to the Hearings in due course.

3. The Vale of Aylesbury Plan – Proposed Housing Numbers

- 3.1 The proposed housing numbers in the Vale of Aylesbury Plan are based on work commissioned from G L Hearn, which states that these represent an objectively assessed housing need for the area. The original report was prepared before the publication of the 2011 Census based household

projections, and an update was prepared in April 2013 which takes these into account.

- 3.2 The proposed figure is for 13,500 homes for the period 2011-2031, of which 9,950 are already committed. Virtually all the reductions from previous planning documents (and part housing completions) are in the Aylesbury housing sub-market area and the removal of any growth relating to Milton Keynes. Thus only an additional 3,550 houses are being proposed in this Plan.
- 3.3 Table 2 in the Plan shows existing commitments in Aylesbury urban area of 7,600, but only 800 additional dwellings being proposed for the period to 2031.
- 3.4 There is no indication within the Plan that there will be any under-provision of housing, and therefore no indication has been given of where any excess housing requirement will be met.
- 3.5 There is no provision to provide for flexibility in the event of sites not coming forward.
- 3.6 The supporting documents submitted by Aylesbury Vale District Council are available on their website at <http://www.aylesburyvaledc.gov.uk/planning-policy/emerging-local-plan-vale-of-aylesbury-plan/vap-strategy-evidence-examination-library/>

4 Basis of Objection

- 4.1 The Vale of Aylesbury Plan proposes a total of 13,500 new homes from 2011 to 2031. Taking into account existing planning permissions and commitments the Plan proposes a requirement for 3,550 new homes to 2031.
- 4.2 The initial work used to inform the preparation of the Vale of Aylesbury Plan, including the consideration of housing numbers, included the 'Housing and Economic Growth Assessment (September 2011). This was published in advance of information from the 2011 Census for England and Wales. As a result, it was necessary to make a number of assumptions about how future projections of population growth change in advance of the Census. Information from the 2011 Census suggests these original assumptions underestimated population growth trends and as a result this is a challenge to the position taken regarding the housing requirement for Aylesbury Vale.
- 4.2 A simple view of the 2011 Census based projections show that the number of households in Aylesbury Vale is expected to grow from 69,703 to 79,583, i.e. by 9,880 between 2011 and 2021. The same increase applied from 2021 to 2031 would give an increase between 2011 and 2031 of 19,760 households.
- 4.3 In order to convert this into a dwellings requirement there needs to be an additional allowance to allow for the normal churn in the housing market, and the constant existence of vacant houses as a part of the normal operation of the housing market. The notional allowance usually applied is 3%.

- 4.4 The addition of this allowance to the households above gives a total requirement 2011 – 2031 of 20,353 dwellings (without any additional allowance for flexibility). This compares with the Sub National Population Projections (SNPP) shown in Figure 26 of the GL Hearn report under scenario SNPP of 20,465 dwellings (1,023 dwellings per annum).
- 4.5 The background of the plan recognises that there has been an average of 844 dwelling completions per annum over the recent five years. If this rate reflects what could be built, then it would reflect a total requirement (2011 – 2031) of 16,880. It is your officers view that this should be regarded as the absolute minimum requirement for the following reasons:
- The 844 per annum was achieved largely during a recession, and so should be considered a minimum in the light of likely economic recovery; and
 - The National Planning Policy Framework requires Councils to “plan positively” (Paragraphs 16, 21 and 23), and it is considered that the proposed numbers do not fulfil this requirement.
- 4.6 The 13,500 dwellings proposed (675 dwellings per annum) is therefore a clear planned under-provision in the Vale of Aylesbury Plan compared with the government’s own sub national population projections, which are required to be taken into account under the terms of the NPPF. It is the view of the JPU that the justification for not using these projections given in the update paper is not sufficiently robust, and does not take account of recent housing completion rates within Aylesbury Vale District.
- 4.7 There is no indication that Aylesbury Vale District Council have requested any other planning authority to make provision for its apparent under supply of housing under the Duty to Co-operate provisions.
- 4.8 It is the JPU’s conclusion, that the proposed housing numbers represent a potential under-supply of housing. Without any acceptance that this is the case, and no indication in the Plan of where or how any under provision will be accommodated, there is a real risk that West Northamptonshire will come under increasing housing pressure to meet any shortfall.

5 Subsequent Discussions

- 5.1 Officers of the JPU have held discussions with officers from Aylesbury Vale following the submission of the Vale of Aylesbury Plan to the government for examination. Aylesbury Vale’s officers view was that the planned provision was within the range of numbers their evidence has suggested would meet their Objectively Assessed Housing Need.
- 5.2 Aylesbury Vale officers believe that their housing trajectory, which shows housing completions falling from 1,026 in 2012/13 to below 450 in 2024/25 and 410 in 2030/31 is justified by their evidence. This is a view which is not accepted by your own officers.

5.3 As a result of these discussions, your officers have indicated that they may wish to make oral representations to the Examination Hearings when they take place (currently requested for November 2013). The Committee's view is required whether they wish Officers to make oral representations to these hearings, or whether they consider written representations will be sufficient.

6 Objection Submitted by Officers

6.1 The objection has been made against Objectives 1 and 2 and Policy VS2 of the Vale of Aylesbury Plan Strategy Proposed Submission Document.

6.2 The reasons for the objection are :

"The proposed housing numbers do not appear to meet the area's Objectively Assessed Needs" when considered against the latest 2011 Census based interim housing projections and recent historic housing completion rates. No indication has been provided to show where any under-supply within the Vale of Aylesbury will be accommodated."

6.3 The changes which have been requested to make the Plan sound are:

"Increase the provision of housing in the plan to at least 20,465 dwellings for the period up to 2031. It may be prudent to increase this by a further amount to allow for both flexibility and sites not coming forward when expected. Re-assess the provision of employment to reflect the higher number of dwellings."

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