



South Bucks Local Development Framework

Overall Affordable Housing Target - Background Paper

July 2010



South Bucks
District Council

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1.0 Introduction

1.1 This paper summarises the policy context and evidence base on affordable housing provision in South Bucks, before explaining how the overall affordable dwelling target in the Core Strategy was derived.

1.2 National Planning guidance in PPS3¹ states that:

“In Local Development Documents, Local Planning Authorities should...set an overall (i.e. plan-wide) target for the amount of affordable housing to be provided. The target should reflect the new definition of affordable housing in this PPS. It should also reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured.”

1.3 The PPS3 Good Practice Guidance ‘Delivering Affordable Housing’ (November 2006) states that local authorities should set “ambitious but realistic affordable housing targets” in order to deliver affordable housing through planning obligations.

1.4 There is strong evidence of a very high level of affordable housing need in South Bucks District. The Bucks Strategic Housing Market Assessment (SHMA), Fordham Research, 2008, suggested that in order to meet these needs fully, 459 new affordable dwellings would be needed per year.

1.5 The Council has assessed the economic viability of land for housing in its Development Economics Study Update (Three Dragons, 2010). This supports a 40% affordable housing target across the District, although this approach would almost certainly require grant funding in the lower sub market areas in many instances.

1.6 The delivery of new affordable housing in South Bucks in recent years has been modest. Policy H5 of the Local Plan² seeks a minimum of 20% of the bedspaces of housing schemes of 15 or more dwellings to be affordable. Under this policy requirement, 228 new affordable dwellings (gross) were built in the period from 1.4.06 to 31.3.10. However, the net gain after demolitions are taken into account was just 45 dwellings (see Annex 1). It is therefore important that there is a significant increase in the amount of affordable housing delivered in future, although Green Belt and other constraints need to be taken into account.

¹ Planning Policy Statement 3 (Housing), para.29.

² South Bucks District Local Plan, adopted March 1999

- 1.7 The Proposed Submission Core Strategy was published in March 2010. It makes provision for between 2,200-2,800 new dwellings (net) over the Plan period, but a large proportion of this has already been built or permitted (1,903 dwellings as of 1.4.10³) under the requirements of Local Plan Policy H5.
- 1.8 The Proposed Submission version of Core Policy 3 (Affordable Housing) includes a target that "a minimum of 500 new affordable dwellings will be provided in South Bucks District between 2006 and 2026".
- 1.9 In response to the Proposed Submission Core Strategy, the Government Office for the South East (GOSE, representor 5) has suggested (representation no. 2007) that the Council prepares a short background paper in order to explain how it arrived at its overall affordable housing target and this will be delivered. A further representation (no. 2208) from the Consortium South of Farnham Common (representor 58) argued that the Proposed Submission Core Strategy failed to show how the minimum of 500 affordable housing units will be achieved, by whom and when.
- 2.0 The overall affordable housing target in the Proposed Submission Core Strategy**
- 2.1 Core Policy 3 in the Proposed Submission Core Strategy sets out the policy position on affordable housing in south Bucks. It seeks that at least 40% of dwellings in schemes of 5 units and above (gross), or on sites of 0.16 hectares and above (irrespective of the number of dwellings) should be affordable, unless this is not economically viable. The policy also states that a financial contribution in lieu of on-site provision may be acceptable where on site provision is inappropriate, and also supports the development of small scale sites for 100% affordable housing (Rural Exception Sites) in principle, where there is a local need and community support.
- 2.2 The 500 dwelling target was based upon an analysis undertaken in 2009 of
- Monitoring data on residential completions (from 2006 to 2009,
 - affordable schemes 'in the pipeline' (under construction and with planning permission) and
 - potential sources of future affordable housing, including potential future housing sites in the Strategic Housing Land Availability Assessment (SHLAA)⁴, on the Core Strategy Opportunity Sites, and on Rural Exception Sites).
- 2.3 This target was considered to be challenging, given the constraints that exist in the District. 87% of the District lies within the Metropolitan

³ This includes under constructions. This figure is provisional and is unpublished.

⁴ Published in 2009.

Green Belt and there are also strong concerns over the loss of character that has occurred in recent years due to residential intensification and backland development. In addition, as stated in paragraph 1.7 above, a large proportion of the planned housing provision to 2026 has already been built or permitted under the policy requirements of the less demanding 1999 Local Plan. It also assumed that the Opportunity Sites at Wilton Park and Mill Lane would both come forward for development (supplying 160 affordable dwellings between them), with an additional yield from the SHLAA sites of nearly 200 affordable units, based on the 40% target and the lower threshold in the emerging Core Strategy.

3.0 A current analysis of the 500 dwelling target

- 3.1 In the light of the representations received to the Proposed Submission Core Strategy and provisional monitoring data from 2009-10, the Council has reviewed the 500 affordable dwelling target in Core Policy 3 of the Proposed Submission Core Strategy. Annex 1 shows the current⁵ position with regard to the potential supply of affordable housing.

Completions 2006-10

- 3.2 Annex 1 shows that from 1.4.06 to 31.3.10, 45 net new affordable housing units were built in South Bucks. This figure would have been higher had it not been for the substantial loss of affordable housing that resulted from the Denham Garden Village scheme, which was completed in 2009-10. This scheme involved the demolition of 183 poor quality affordable dwellings and the construction of 184 market units and 143 social units in three phases, resulting in a net loss of 40 affordable dwellings.

Outstanding Planning Permissions

- 3.3 There are 143 outstanding affordable units with planning permission. However, some of these may not be implemented. For example, there is some uncertainty over the delivery of the Denham Film Laboratories (Deluxe) scheme in Denham Green. This scheme would deliver about 60 affordable units, but firstly requires the relocation of Deluxe to the Pinewood Studios site. In addition it has recently been announced that the preferred route for the High Speed 2 railway line passes very close to the site, which might affect its suitability for housing development.

Strategic Housing Land Availability Assessment (SHLAA) sites

- 3.4 The SHLAA was published in October 2009, and it identified sites without planning permission that could potentially deliver 611 dwellings. Many of the sites identified are smaller than 0.16 hectares in size and (based on density assumptions set out in the SHLAA) would provide less than 5

⁵ As of 31.3.2010

dwellings, and therefore below the affordable housing thresholds in the Proposed Submission Core Strategy. Since 2009 planning permission has been granted for housing development on a number of the SHLAA sites under the current Local Plan requirement of a minimum of 20% of bedspaces to be affordable, on sites of 15 units and above⁶. Hence, some of the SHLAA sites previously assumed to provide affordable housing, have in practice delivered no affordable housing.

- 3.5 It is estimated that about 200 affordable units could be delivered from the remaining SHLAA sites, based on the expected 40% affordable housing requirement in the Core Strategy. However, this is a maximum figure with the actual provision likely to be lower. Not all SHLAA sites will come forward for development, others are likely to be permitted in 2010/11 before the Core Strategy is adopted and it is not certain that 40% affordable housing will be secured on all of these sites.

Core Strategy 'Opportunity Sites'

- 3.6 It is estimated that up to 160 affordable units will be secured from the two Core Strategy 'Opportunity Sites' at Wilton Park (to the east of Beaconsfield) and Mill Lane (at Taplow). However, there is a possibility that one or more of these Opportunity Sites will not be developed in the Plan period. For example, Wilton Park may not be released by the Ministry of Defence for redevelopment. Even if part of the site is released, the MoD has indicated that they may decide to retain the Service Family Accommodation. Mill Lane is a complex, sensitive site, with multiple landowners and again there is a possibility that an appropriate scheme may not come forward on the site. Because of these uncertainties, the sites are not strategic allocations in the Core Strategy and they are not central to the delivery of the Spatial Strategy.

Other Sources of Affordable Housing

- 3.7 The Core Strategy supports the development of small scale sites for 100% affordable housing in specific 'rural' parishes, as defined in Statutory Instrument 1997/625. These sites would be permitted as a strict exception to normal Green Belt policy and would only be permitted where there is a demonstrable local need and where there is local community support. It is estimated that about 20 affordable dwellings could be secured from these Rural Exception Sites during the Plan period.
- 3.8 It is likely that some additional affordable units will be delivered through housing association-led schemes, on sites outside of the Section 106 system. These could include sites currently used for garages and the conversion of private dwellings into affordable dwellings through the use of commuted payments secured on other schemes. It is estimated that

⁶ Unpublished 2009-10 monitoring data

this source could yield about 50 affordable dwellings over the Plan period.

- 3.9 Finally, it is possible that one or more ‘windfall’ sites could unexpectedly come forward during the next 15 years, for example on redundant employment sites. However, the Core Strategy seeks to retain employment sites in employment use (B Use Class), and even if there is no prospect of sites being retained in their current use, the priority will be for the site to be used for an alternative economic use (as defined in PPS4) rather than for housing. Therefore, the scope for affordable housing from windfall sites is limited and for the purposes of this Paper, it has been assumed that there will be no affordable housing secured from this source.

Proposed Changes to Core Policy 3 in the Core Strategy

- 3.10 Annex 1 shows that the maximum number of affordable housing units likely to be delivered in the District to 2026 is 618 units. However, for this to be achieved, both the Opportunity Sites, all permitted schemes and all qualifying SHLAA sites would need to be implemented. This is unlikely to happen.
- 3.11 The Council has therefore decided to retain the 500 affordable dwelling target, as a challenging but achievable figure. However, to reflect the status of the Opportunity Sites, it is proposed to present the affordable housing target as a range. In its Schedule of Proposed Changes to the Core Strategy, the Council is proposing that Core Policy 3 should now state that

“A minimum of 350-500 affordable dwellings will be provided in South Bucks between 2006 and 2026”.

A footnote will be added as follows:

“The lower end of the range is based upon neither of the Opportunity Sites (Wilton Park and Mill Lane) coming forward for development. The upper end of the range assumes both of these sites are developed during the Plan period.”

- 3.12 The supporting text to the policy will also be amended to make it clear that achievement of the 500 unit figure is dependent on the Opportunity Sites being developed.
- 3.13 It should be stressed that this is essentially a presentational change, with the upper end of the 350-500 range remaining unchanged. Moreover, the upper figure is still a minimum and may be exceeded. For example, it is possible that other sites will come forward unexpectedly during the Plan period, and that at least one of these will provide affordable housing.

4.0 Conclusions

- 4.1 The Council has produced this background paper in response to two representations made to the Proposed Submission Core Strategy, and in light of more up-to-date monitoring data.
- 4.2 This analysis has concluded that the headline minimum 500 dwelling affordable housing target is robust, being “ambitious but realistic” in accordance with best practice guidance. However, to reflect the uncertainty over the delivery of the two Opportunity Sites at Wilton Park and Mill Lane and some other sites with planning permission, it is proposed that the target is presented as a range (minimum of 350-500 units).
- 4.3 The Council is confident that this target, as amended, is robust, reflecting the high need for affordable housing in the District, at the same time taking account of risks to delivery and economic viability considerations.

Annex 1 - An Analysis of the Potential Supply of Affordable Housing in South Bucks in the Period 2006-26

Sources of affordable housing in South Bucks in the period 2006-26 are as follows:

A. Completions from 1.4.06 - 31.3.10:

2006-07

Planning application	Address	Gross no. of AH units	Net gain in AH	Notes
03/00746/REM	Denham Garden Village Phase 1	70	7 ⁷	Council has no-noms
04/01607/FUL	Cranwell Meadow, Farnham Common	11	11	Shared Ownership
TOTAL		81	18	

2007-08

Planning application	Address	Gross no. of AH units	Net gain in AH	Notes
04/00737/FUL	Garvin Avenue, Beaconsfield	9	9	Rented
05/00500/REM	Denham Garden Village Phase 2	52	4 ⁸	No-noms
06/01130/FUL	Upper Meadow, Hedgerley Lane, Gerrards Cross	9	9	3 rented, 6 shared ownership
06/01365/FUL	Devonshire Green Phase 1 (AKA Savile House etc), Beaconsfield Road, Farnham Common	11	11	all shared ownership - 6 flats, 5 houses
06/01365/FUL	Devonshire Green Phase 2, Farnham Common ⁹	12	12 flats	All shared ownership. Was not recorded as affordable housing in 2007-08 AMR.
TOTAL		93	45	

2008-09

Planning application	Address	Gross no. of AH units	Net gain in AH	Notes
07/01390/FUL	Orchardville Garage site,	5	5 houses	All rent - all houses

⁷ 70 affordable dwellings built and 63 demolished.

⁸ 52 affordable dwellings built and 48 demolished.

⁹ RSL purchased these 12 completed flats 'off the shelf' from developer for shared ownership.

	Burnham ¹⁰			
06/01130/FUL	Upper Meadow, Hedgerley Lane, Gerrards Cross	2	2	Shared ownership
TOTAL		7	7	

2009-10

Planning application	Address	Gross no. of AH units	Net gain in AH	Notes
06/00266/FUL	Bells Hill, Stoke Poges	10	10 flats ¹¹	all shared ownership - all flats
04/01512/FUL	Candlemas Lane, Beaconsfield ¹²	11	11 units	all shared ownership - 4 flats, 7 houses
08/01596/FUL	Colne Orchard Garage site, Iver	5	5	All Rental
07/00182/REM	Denham Garden Village Phase 3	21	-51 ¹³	No noms
TOTAL		47	-25	

Total gross affordable completions 2006-10 = 81+93+7+47 = 228 dwellings

Total net affordable completion 2006-10 = 18+45+7-25 = 45 dwellings

B. Outstanding Affordable Planning Permissions at 31.03.10

Planning application	Address	Gross no. of AH units	Net gain in AH	Notes
06/01348/OUT & 08/02055/OUT	SGT, Taplow	12	12	Flats, Rented
08/00091/OUT	Denham Film Laboratories, (Deluxe), Denham Green ¹⁴	60	60	18 units rented 42 units shared ownership
08/00891/FUL	William King Flour Mill, Denham Green	35	35	Flats, shared ownership
09/01111/FUL	81 Candlemas Mead	6	1	
09/01145/FUL	Butler's Court, Wattleton Road, Beaconsfield	17	17	2 houses, 15 flats 5 shared ownership 12 intermediate rent

¹⁰ Late 08 completion

¹¹ AMR 07/08 says Bells Hill is for 9 AH units but housing say it is 10.

¹² April 09 completion

¹³ 21 affordable dwellings built and 72 demolished.

¹⁴ Unlikely to be implemented in the near future

08/01123/REM	Former Thames Pumping Station, Burnham	4	4	1 unit rented 3 shared ownership
09/01457/FUL	Former Inn on the Green, Broadway East and Moorfield Road	7	7	
09/01618/FUL	Alexander Korda House, Ranston Close	8	-6	
07/00780/REM	Land at Meadow Cottage, Longridge & Saltmarshe, Bangors Rd South	6	6	10/00859/XOUT pending decision
10/00443/FUL	Land Rear of 60 Cherry Tree Road, Beaconsfield	7	7	Social rented
TOTAL		162	143	

C. Strategic Housing Land Availability Assessment sites

The total combined yield of such sites¹⁵ amounts to 502 dwellings; 40% of this results in an estimated maximum contribution of **200 units**.

D. Opportunity Sites

The Core Strategy estimates c. 400 units in total on these sites (Mill Lane, Taplow = 100 units and Wilton Park = 300 unit). 40% of 400 units = **160 units**.

E. Rural Exception Sites

This will only apply to Dorney, Fulmer, Hedgerley, Taplow & Wexham (plus rural parts of Beaconsfield and Stoke Poges). Yield estimated = **20 units**.

F. Housing association-led schemes

Some units will be delivered by housing associations on sites outside of the Section 106 system for 100% affordable housing, for example on garage sites by L&Q or through the conversion of private houses into affordable use. Estimated yield = **50 units**.

Possible L&Q sites include

- Savay Close Garage site, Denham
- Hanbury Close, Burnham
- Priors Close, Denham Village,
- St Mary's Road, Denham Green

Note: The development of these sites would be subject to viability, feasibility and planning consent being granted.

¹⁵ Based on SHLAA sites that are either 0.16 ha in size or have an estimated yield of 5 dwellings and above, based on the density assumption for the particular site.

Summary - Maximum likely future supply of affordable housing

Supply under existing Local Plan policy (20% AH on sites of 15+)

A. Net completions 2006-10	45
B. Net outstanding planning permissions	143 ¹⁶

Supply to be provided under expected new policy (40% AH on sites of 5+)

C. SHLAA sites	200
D. Opportunity sites	160 ¹⁷
E. Rural exception sites	20
F. Housing Association-led schemes	50

<i>Total Maximum yield 2006-26</i>	<i>618</i>
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¹⁶ This includes 60 affordable units at the Denham Film Laboratories site that may not be implemented.

¹⁷ This assumes that both opportunity sites will come forward for development



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