

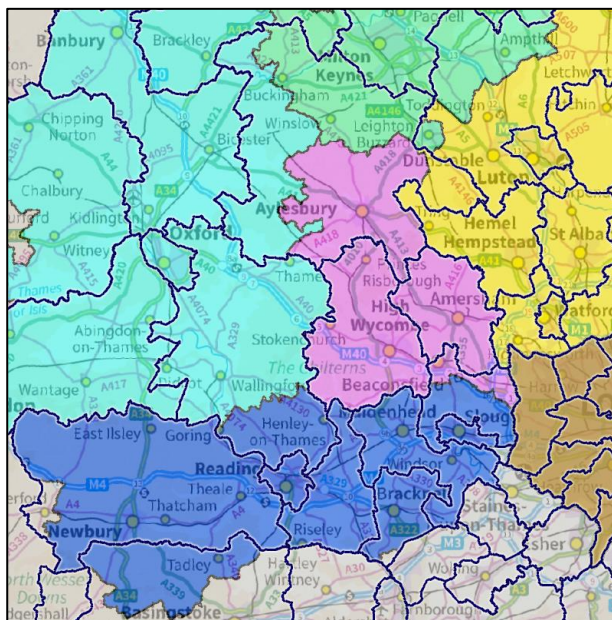
HMAs and FEMAs in Buckinghamshire

The Impact of a Joint Plan for Chiltern and South Bucks

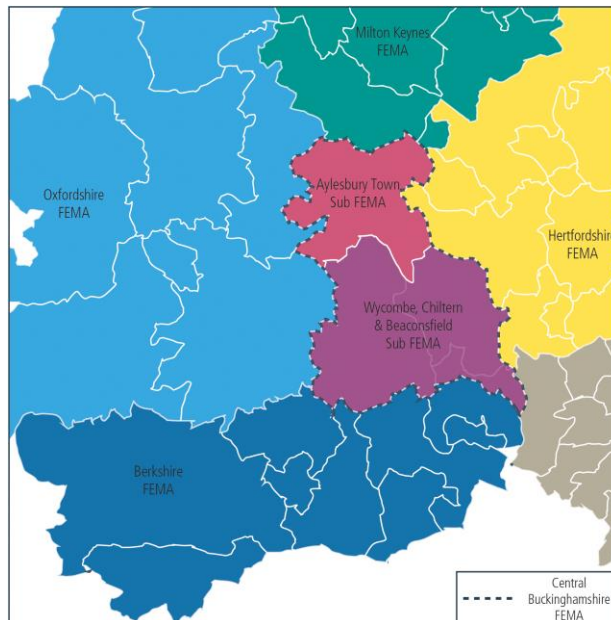
1. Opinion Research Services (ORS) and Atkins prepared a report to identify Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) for Buckinghamshire county and the surrounding areas which was published in March 2015.
2. Figure 1 illustrates the functional housing market areas (HMAs) and functional economic market areas (FEMAs) that the study identified.

Figure 1: Functional housing and economic market areas for Buckinghamshire and the surrounding area

Functional Housing Market Areas (HMAs)



Functional Economic Market Areas (FEMAs)



3. The NPPF recognises that housing market areas may cross administrative boundaries, and PPG emphasises that housing market areas reflect functional linkages between places where people live and work. Nevertheless, there is need for a “best fit” approximation to local authority areas for developing evidence and policy as suggested by the PAS OAN technical advice note¹ (second edition, paragraphs 5.9 and 5.21):

“Boundaries that straddle local authority areas are usually impractical, given that planning policy is mostly made at the local authority level, and many kinds of data are unavailable for smaller areas”

“It is best if HMAs, as defined for the purpose of needs assessments, do not straddle local authority boundaries. For areas smaller than local authorities data availability is poor and analysis becomes impossibly complex.”

4. Given this context, the original study established the most appropriate “best fit” areas for the functional HMAs and FEMAs that had been identified, based on local authority boundaries. The report concluded that

¹ Objectively Assessed Need and Housing Targets (PAS, July 2015)

the substantial majority of Buckinghamshire county residents (80%) live in the Central Buckinghamshire functional housing market area. Chiltern and Wycombe districts fall entirely within this functional housing market area together with almost two-thirds of the Aylesbury Vale district population (with the remaining population split across three different functional housing markets).

5. However, it was concluded that South Bucks population was divided, with approaching half living in the Central Buckinghamshire functional housing market area and the remainder all living in the Reading & Slough functional area – and in considering a “best fit”, it could be argued that South Bucks should be associated with either Central Buckinghamshire or Reading & Slough. Nevertheless, the study proposed a hierarchy for the “best fit” for South Bucks supported by the data on both commuting and migration flows; with the first preference being London, the second being Berkshire and the third being with the rest of Buckinghamshire.
6. Therefore, based on a detailed analysis of the evidence, the original study concluded that Aylesbury Vale, Chiltern and Wycombe local authorities comprised the most pragmatically appropriate “best fit” for the Central Buckinghamshire housing market area; and that South Bucks district should be considered within the “best fit” for Reading & Slough HMA.
7. In relation to functional economic market areas, the PAS OAN technical advice note suggests that (second edition, paragraphs 5.34-35):

“One would expect HMAs and economic market areas to be geographically similar, because in broad terms both are largely determined by the reach of a daily return trip ... It is helpful if HMAs and economic market areas are coterminous. This makes both analysis and policy-making more manageable ... It also makes it possible to plan for alignment of jobs and workers – something which is very difficult to do at the level of individual authorities.”

8. The functional areas for HMAs and FEMAs that the original study proposed were coterminous and the recommendations for “best fit” reflected this.

Considering the Implications of a Joint Plan

9. Previously both Chiltern and South Bucks District Councils were preparing separate Local Plans for their respective Districts but a single joint Local Plan (“Joint Plan”) is now to be produced covering the two areas. This was agreed by Chiltern District Council on 3 November 2015 and South Bucks District Council on 10 November 2015. Work has started on the Joint Plan for Chiltern and South Bucks.
10. The decision to develop a Joint Plan for Chiltern and South Bucks has no impact on the functional areas identified in Figure 1. Nevertheless, the conclusions about the most appropriate “best fit” configuration will be affected if Chiltern and South Bucks are jointly considered as a single, combined area; i.e. if the “best fit” geography was based on Local Plan areas rather than local planning authorities.
11. There are two clear reasons for HMAs and FEMAs to be constrained to administrative boundaries. These are summarised in the above extracts from the PAS OAN technical advice note:
 - » **Evidence:** *“for areas smaller than local authorities data availability is poor and analysis becomes impossibly complex”* (second edition, paragraph 5.21); and
 - » **Policy:** *“boundaries that straddle local authority areas are usually impractical, given that planning policy is mostly made at the local authority level”* (second edition, paragraph 5.9).

12. Even with the new Joint Plan, evidence will still be available separately for the two local authority areas. Nevertheless, whilst planning policy is mostly made at the local authority level, a Joint Plan means that planning policy will be developed jointly for the combined area.
13. Given this context, it is relevant to note that Planning Practice Guidance for housing and economic development needs assessments identifies that:

Where there is a joint plan, housing requirements and the need to identify a five year supply of sites can apply across the joint plan area. The approach being taken should be set out clearly in the plan.

Planning Practice Guidance (March 2014), ID 2a-010

14. Chiltern and South Bucks Councils have agreed to consider development needs collectively across both districts, so the housing requirement and housing supply will be considered across the Joint Plan area. Given this context, the NPPF requirement to identify the “full, objectively assessed need for market and affordable housing” (paragraph 47) would need to establish the overall housing needs of the combined area.
15. As the development needs of Chiltern and South Bucks will be considered collectively, it will be necessary to establish an evidence base for the combined area. On this basis, whilst data is available for the two local authority areas individually, we believe that it is more appropriate to establish a “best fit” geography for HMAs and FEMAs based on Local Plan areas.

“Best Fit” Geography based on Local Plan Areas

16. Figure 2 shows the distribution of the resident population of each local authority area across the functional areas that were identified, together with the distribution of resident population for the combined area of Chiltern and South Bucks. It is evident that the substantial majority of the population in the combined area (over 75%) live in the Central Buckinghamshire functional area.

Figure 2: Resident Population in 2011 by Local Authority Area and Functional Area (Source: 2011 Census. Note: Population rounded to nearest 100. Figures may not sum due to rounding)

Local Authority Area	Functional Area									
	Central Buckinghamshire		Reading & Slough		Oxford		Milton Keynes		Watford & Luton	
	N	%	N	%	N	%	N	%	N	%
Aylesbury Vale	111,700	64.2%	-	-	20,500	11.8%	32,400	18.6%	9,500	5.5%
Chiltern	92,600	100.0%	-	-	-	-	-	-	-	-
South Bucks	27,200	40.7%	39,600	59.3%	-	-	-	-	-	-
Wycombe	171,600	100.0%	-	-	-	-	-	-	-	-
TOTAL	403,200	79.8%	39,600	7.8%	20,500	4.1%	32,400	6.4%	9,500	1.9%
Chiltern & South Bucks	119,800	75.2%	39,600	24.8%	-	-	-	-	-	-

17. Figure 3 shows commuting flows and Figure 4 shows migration flows to and from the combined area.

Figure 3: Local authority commuting flows to and from the Chiltern and South Bucks combined area (Source: 2011 Census. Note: Individual LAs identified where number of commuters to/from Chiltern and South Bucks was 500 or more)



Figure 4: Local authority migration flows to and from the Chiltern and South Bucks combined area (Source: 2011 Census. Note: Individual LAs identified where number of migrants to/from Chiltern and South Bucks was 100 or more)



18. It is evident that there are strong links between the combined area and London: almost half (46%) of all workers that commute out of the area work in London, and over a third (37%) of people moving to the area previously lived in London boroughs. Nevertheless, whilst the functional relationships with London are important, the Mayor of London and the Greater London Authority are responsible for the London Plan and this is based on the administrative boundary for the region. Therefore, it is pragmatic and appropriate to define Greater London using the administrative boundary and then separately consider the commuting flows outside the region.
19. Considering the relationships outside London, it is evident that the combined area has links with the rest of Buckinghamshire, with parts of Berkshire and (to a lesser extent) with parts of Hertfordshire.
20. The data shows a broad balance between the workers that commute out of the area to the rest of Buckinghamshire (16%) and to Berkshire (20%). Similarly, there is a broad balance in the number of people moving to the area from the rest of Buckinghamshire (13%) and Berkshire (15%); however the proportions for Berkshire are marginally higher on both of these measures. Nevertheless, the flows in the opposite direction show that notably more workers commute into the area from the rest of Buckinghamshire than from Berkshire (30% and 22% respectively). This pattern is also reflected in the flows of people moving out of the area: moves to the rest of Buckinghamshire represent 21% of the total whereas moves to Berkshire account for 13% of all moves.
21. Given this context, we can conclude that the Chiltern and South Bucks combined area has strong links with both the rest of Buckinghamshire and parts of Berkshire (especially Slough and Windsor and Maidenhead); but the evidence identifies that links with the rest of Buckinghamshire are stronger than links to Berkshire.

Preliminary Conclusions

22. The data identifies that the substantial majority of the population in the Chiltern and South Bucks combined area (over 75%) live in the Central Buckinghamshire functional area that was identified by the original study. This evidence clearly supports that the combined area should be considered within the “best fit” for Central Buckinghamshire housing market area.
23. Whilst the commuting and migration flows identify strong links with London, we would not recommend that Chiltern and South Bucks are included within the London HMA given the particular issues relating to way housing is planned in the London region. As a second preference, the commuting and migration flows identify that the next strongest linkage for the combined area is with the rest of Buckinghamshire. On this basis, the data on both commuting and migration flows also supports that the combined area should be considered within the “best fit” for Central Buckinghamshire housing market area.
24. Based on a detailed analysis of the evidence, we would therefore recommend that the most pragmatically appropriate “best fit” for Chiltern and South Bucks as a single, combined area would be as part of the Central Buckinghamshire housing market area. On this basis, the evidence identifies that the “best fit” for the whole Central Buckinghamshire HMA would comprise the local authorities of Aylesbury Vale, Chiltern, South Bucks and Wycombe. As the same functional area was identified for the HMA and FEMA, the recommended “best fit” for the FEMA would also be based on the same four local authority areas.
25. These “best fit” groupings do not change the actual geography of the functional housing market areas that have been identified – they simply provides a pragmatic arrangement for the purposes of establishing the evidence required, as suggested by the CLG advice note and reaffirmed by the PAS technical advice note.

26. Whilst we believe that this proposed grouping for Central Buckinghamshire HMA provides the overall “best fit” for joint working (on the basis of a Joint Plan being developed for Chiltern and South Bucks), it is not the only arrangement possible given the complexities of the functional housing market areas in the region. Regardless of the final groupings, the more important issue will be the need for Chiltern and South Bucks to maintain dialogue with the other Buckinghamshire districts as well as with Reading, Slough and Windsor and Maidenhead. Furthermore, the districts will need to maintain dialogue with the boroughs to the West of London, as well as with the Mayor of London through the Greater London Authority.

Duty to Cooperate: Stakeholder Feedback

27. A draft of this note (including the preliminary conclusions) was circulated to stakeholders highlighting the approach proposed and inviting comments. Responses were received from six local authorities:

- » Aylesbury Vale District Council;
- » Bracknell Forest Borough Council;
- » Royal Borough of Windsor and Maidenhead;
- » Slough Borough Council;
- » Wokingham Borough Council; and
- » Wycombe District Council.

28. Feedback received from all stakeholders was proactively reviewed and discussed with officers from Chiltern and South Bucks Councils. Full copies of each response are included as an Annex at the end of this note.

29. Most responses recognised that no further analysis had been undertaken to update the geography of the functional housing market areas previously identified by the March 2015 report. Furthermore, they readily supported the view that the decision whether or not to undertake a Joint Plan would have no impact on these functional areas:

“The decision whether or not to undertake a joint plan has no impact on the functional areas identified” (Royal Borough of Windsor and Maidenhead)

“The decision about whether or not Chiltern and South Bucks local planning authorities develop a Joint Plan has no impact on the functional areas” (Bracknell Forest BC)

“This will not change the actual geography of the functional housing market areas” (Slough BC)

30. However, it was apparent that some stakeholders had failed to appreciate that this note was intended to be read in conjunction with the March 2015 report, and it was only the conclusions relating to “best fit” that were being reconsidered in the context of a Joint Plan for Chiltern and South Bucks:

“The information provided within the October 2015 report does not demonstrate a comprehensive analysis to justify the conclusion that South Bucks is within the Central Buckinghamshire HMA. National Planning Policy Guidance recommends that there should be an analysis of house prices and rates of change in house prices, an analysis of household migration and search patterns and an analysis of contextual data (for example, travel to work area boundaries). There is also no mention of commuting or migration self-containment rates which is the recommended indicator to define housing market areas by the National Planning Policy Guidance.” (Wokingham BC)

31. The March 2015 report considered the full range of information sources when establishing the functional housing and economic market areas set out in Figure 1, and that analysis identified that South Bucks district was clearly divided across two functional housing market areas.

32. Some stakeholders suggested that the Joint Plan should be based on evidence which considered the two functional areas:

“I see no practical reasons which would inhibit the preparation of a joint plan being unable to suitably consider two functional geographies” (Royal Borough of Windsor and Maidenhead)

“Further clarification is sought as to why a Joint Plan could not consider two functional geographies” (Bracknell Forest BC)

“No consideration appears to have been given as to whether or not it is practical to have a Local Plan spread over two Housing Market Areas or have a District that is in more than one Housing Market Area” (Slough BC)

33. Unfortunately, however, it is not the case that:

“Data for both functional geographies is readily available” (Royal Borough of Windsor and Maidenhead)

34. Data for functional geographies is not readily available. The PAS technical advice note identifies that *“for areas smaller than local authorities data availability is poor”*, which is why a “best fit” geography is needed.

35. Using a “best fit” geography, local authorities are associated with the single housing market area with which they have the strongest links. The “best fit” groupings do not change the actual geography of the functional housing market areas that have been identified – they simply provide a pragmatic arrangement for the purposes of establishing the evidence needed for the plan-making process. However, the evidence that is subsequently prepared will normally cover the whole of the local authority area (including any parts of the local authority that might fall in another functional HMA). On this basis, the objectively assessed needs identified will encompass the full needs of the whole administrative area.

36. As previously noted, the March 2015 report considered “best fit” based on local authority areas, whereas this note has considered “best fit” based on Local Plan areas with a Joint Plan for Chiltern and South Bucks. This is a fundamental difference which directly impacts on the conclusions reached. On this basis, it is incorrect to assert:

“The findings of the October 2015 report are not consistent with the findings of the March 2015 report which concludes that South Bucks is within the Reading and Slough HMA” (Wokingham BC)

“The conclusions of the October 2015 report contradict the findings of the March 2015 report” (Wokingham BC)

37. The reports are fully consistent, but based on different geographies when establishing “best fit”.

38. The justification for establishing “best fit” based on Local Plan areas was, however, queried by some:

“No explanation is provided as to why the best fit approximation should be applied to the local plan area” (Royal Borough of Windsor and Maidenhead)

“There is nothing within the PAS note that supports best fit being to a local plan area” (Royal Borough of Windsor and Maidenhead)

“There is also no guidance within the National Planning Policy Framework, the National Planning Practice Guidance or within the Planning Advisory Service Objectively Assessed Need note which supports the approach of assessing the HMA at the geographical scale that a proposed local plan would cover” (Wokingham BC)

39. The extract from PPG cited earlier in this note (ID 2a-010) establishes that housing requirement and housing supply can apply across a joint plan area; and given that overall housing need is a key input for establishing housing requirement, it would seem appropriate for the OAN to also be determined across the joint plan area to ensure consistency across the Local Plan evidence base.

40. Feedback from other stakeholders recognised the pragmatism of this approach, given the intention to consider housing requirements and housing supply across the joint plan area:

“If the joint plan is going to have a single allocation derived from the combined objectively assessed needs for the two districts, I can see that there may be a case for trying to put them into the same HMA” (Slough BC)

“We accept that the best fit HMA has to apply joint local authority boundaries where there is a to be a joint Local Plan for that area” (Aylesbury Vale DC)

“From the evidence supplied it would seem that the most robust approach would be for the South Bucks/Chiltern Local Plan area to be included in the Central Buckinghamshire Housing Market Area, and we should seek to be evidence led” (Wycombe DC)

41. Nevertheless, one stakeholder referred to the approach taken by Stratford upon Avon local authority area where the whole of the district was included in housing needs assessments for two neighbouring HMAs, as cited by the second edition of the PAS technical advice note (paragraphs 5.22-23):

“HMAs made up of whole local authority areas sometimes look very imperfect, because for some authorities the market reality is that different parts of the area are linked to different neighbouring authorities. An example is the district of Stratford-on-Avon, which covers a very large land area. The fine-grained NHPAU geography and further analysis show that the north of the district is well related to the Greater Birmingham HMA and the south to the Coventry and Warwickshire HMA. But a housing needs analysis that splits the district in two would be unmanageable.

A better (though untidy) solution is to include the whole of Stratford district in housing needs assessments for both HMAs; and later when setting targets to bear in mind that both HMAs competing claims on the district’s land supply. Inspectors have often accepted this kind of approach, noting that HMAs overlap, their boundaries are permeable and no market geography is perfect”

42. On this basis, it was suggested that:

“The PAS note indicates that they will need to carefully consider how they potentially use two OAN figures when deriving a housing target and will very carefully need to consider how they can provide a deliverable supply of sites” (Wokingham BC)

43. PPG clearly recognises that *“It might be the case that housing market areas overlap”* (ID 2a-010) and the March 2015 report recognised that a range of different options could be available for joint working given the *“complexities of the functional housing market areas in the region”* (paragraph 7.33).

44. Whilst there is some argument that the March 2015 report might have concluded that South Bucks district could have been included within the “best fit” for both Central Buckinghamshire HMA and Reading & Slough HMA (given that the district is divided between the two functional areas), it seems unlikely that this would have been a particularly pragmatic approach for establishing the Local Plan evidence base. Indeed, such an approach would be contrary to the NPPF’s intention of *“Using a proportionate evidence base”* (paragraphs 158 et seq) and PPG expectation that *“Assessing development needs should be proportionate”* (ID 2a-003). Given this context, the original study conclusions remain appropriate.
45. Of course, the focus of this note is the implications of a Joint Plan for Chiltern and South Bucks. Based on the evidence, there is less justification for including the combined area of Chiltern and South Bucks in the “best fit” for both HMAs than there would have been for doing so with South Bucks independently. Central Buckinghamshire HMA covers a much larger majority of the combined area’s population and the combined area has stronger links with Central Buckinghamshire HMA in terms of commuting and migration. Furthermore, we do not believe that there is any reasonable justification for considering an independent OAN for South Bucks district alongside a combined OAN for Chiltern and South Bucks given that the combined OAN would cover the whole of the two administrative areas.
46. Nevertheless, it is still important to recognise the ongoing need for joint working with neighbouring areas. Existing functional relationships will be relevant to any decisions about the spatial distribution of future housing and employment that will need to be considered when the Councils develop their Joint Plan. The interim conclusions set out (paragraph 26 above):

“Regardless of the final groupings, the more important issue will be the need for Chiltern and South Bucks to maintain dialogue with the other Buckinghamshire districts as well as with Reading, Slough and Windsor and Maidenhead.”

47. This conclusion was clearly endorsed by the stakeholder feedback:

“Evidence endorsed by the Buckinghamshire authorities and that emerging from the Berkshire authorities both indicate that South Bucks, Slough and the Royal Borough need to work positively together” (Royal Borough of Windsor and Maidenhead)

“Whatever pragmatic solution is adopted towards re-defining HMAs, there will still be a need for extensive Duty to Co-operate discussions with all adjoining authorities. We would expect South Bucks/Chiltern to work closely with ourselves and Windsor and Maidenhead to consider how the objectively assessed housing need within this area could be met” (Slough BC)

“We welcome the opportunity for on-going discussion relating to housing and employment matters” (Bracknell Forest BC)

“The addition of South Bucks into the HMA has wider Duty to Cooperate implications particularly in relation to the issue of addressing unmet needs, and we will need to work together closely on this issue” (Wycombe DC)

“The other aspect that concerns us is also one shared by Wycombe i.e. what will the impact on unmet need be and the timetable for finding that out. AVDC is aiming to produce a draft Plan next Spring so we would need to know implications of unmet need as soon as possible to avoid any delays in our plan preparation” (Aylesbury Vale DC)

48. It will therefore be important for Chiltern and South Bucks to continue to work positively with all of their neighbouring areas.

Final Conclusions

49. Having considered the detailed feedback received from stakeholders, on balance we consider that a “best fit” housing market geography based on Local Plan areas remains the most appropriate approach; and the most pragmatically appropriate “best fit” for Chiltern and South Bucks as a single, combined area is as part of the Central Buckinghamshire housing market area: an area that comprises the local authorities of Aylesbury Vale, Chiltern, South Bucks and Wycombe. As the same functional area was identified for the HMA and FEMA, the recommended “best fit” for the FEMA would also be based on the same four local authority areas.
50. Nevertheless, we would emphasise again that this “best fit” grouping does not change the actual geography of the functional housing market areas that have been identified. In developing their Joint Plan, it will be important for the Councils to consider any decisions about the spatial distribution of housing and employment in the context of the functional geographies.
51. It will also be important for both Councils to maintain dialogue with the other Buckinghamshire districts as well as relevant Berkshire authorities and the boroughs to the West of London, as well as with the Mayor of London through the Greater London Authority.

Annex

Responses from Stakeholders

Email correspondence from:

Aylesbury Vale District Council

Slough Borough Council

Royal Borough of Windsor and Maidenhead

Wycombe District Council

Written submissions from:

Bracknell Forest Council

Wokingham Borough Council

From: Williams, Peter [mailto:pwilliams@aylesburyvaledc.gov.uk]
Sent: 01 October 2015 13:32
To: Graham Winwright
Subject: RE: CONFIDENTIAL - Potential Changes to Chiltern and South Bucks Local Plan approach and timetable [OFFICIAL-SENSITIVE]

Hi Graham

I don't think I have officially replied to you on this. Our position is much the same as Wycombe's i.e. we accept that the best fit HMA has to apply joint local authority boundaries where there is to be a joint Local Plan for that area. We would however need to see the justification for that best fit area applying to all four Bucks councils as the relationship between S Bucks/Chiltern and Aylesbury Vale will need to be considered.

The other aspect that concerns us is also one shared by Wycombe i.e. what will the impact on unmet need be and the timetable for finding that out. AVDC is aiming to produce a draft Plan next Spring so we would need to know implications of unmet need as soon as possible to avoid any delays in our plan preparation. Therefore a timetable will need to be produced and then the MoU can be updated to reflect the responsibilities of the signatories.

Regards

Peter Williams

Policy Team Leader
Aylesbury Vale District Council
Office - 01296 585208

From: Stimpson Paul [mailto:paul.stimpson@slough.gov.uk]
Sent: 22 October 2015 16:29
To: Graham Winwright
Subject: RE: Duty to Co-operate Request - Potential Changes to Chiltern and South Bucks Local Plan approach and timetable [OFFICIAL]

Graham

Thanks for updating us about the latest position with regards the progress towards a possible joint Local Plan for South Bucks and Chiltern.

This will obviously lead to some complications since the authorities have been identified as being in two different HMAs in the ORS report that was published in March.

You have provided a note from ORS on the impact of a joint plan. As I understand it they have not carried out any new technical work and have not sought to change their conclusions as to where the functional Housing Markets are, as set out in Figure 1.

ORS have, however, reconsidered what the “best fit” geography would be if it was based upon Local Plan boundaries rather than local authority boundaries. In doing so no consideration appears to have been given as to whether or not it is practical to have a Local Plan spread over two Housing Market Areas or have a District that is in more than one Housing Market Area.

It is not clear upon what basis the new joint plan will be prepared. If it is going to retain separate housing allocations for South Bucks and Chiltern there would be no reason to change the currently defined HMAs. If the joint plan is going to have a single allocation derived from the combined objectively assessed needs for the two districts, I can see that there may be a case for trying to put them into the same HMA.

Whether they both go into central Bucks or an expanded east Berks/southern Buckinghamshire HMA is not as clear cut as the crude analysis in Figure 2 would suggest. The more detailed analysis set out in Figures 3 and 4 shows that the strongest links for the two districts is with London but combining with the GLA area has been ruled out for pragmatic reasons.

ORS consider that on balance the second best “best fit” is that South Bucks should be put into the Central Buckinghamshire HMA for pragmatic plan making reasons.

The evidence for this is fairly weak and as ORS point out this will not change the actual geography of the functional housing market areas.

Whatever pragmatic solution is adopted towards re-defining HMAs, there will still be a need for extensive Duty to Co-operate discussions with all adjoining authorities. We would expect South Bucks/Chiltern to work closely with ourselves and Windsor and Maidenhead to consider how the objectively assessed housing need within this area could be met.

As you will be aware, this Council considers that the failure of the technical work that has been carried out on the South Bucks plan to consider an urban expansion of Slough is a serious omission that could undermine the soundness of the plan. As a result it is hoped that the suggested new Joint plan time table,

with a new Reg 18 Issues and Options consultation, will provide the opportunity to consider all reasonable sustainable alternative options for housing distribution within the plan area.

Paul Stimpson

Planning Policy Lead Officer
Planning and Building Control Service
Slough Borough Council
Tel: 01753 875820
Fax: 01753 875869
www.slough.gov.uk

From: Peter Lerner [mailto:Peter.Lerner@RBWM.gov.uk]
Sent: 08 October 2015 17:43
To: Graham Winwright
Subject: Duty to Co-operate Request - Potential Changes to Chiltern and South Bucks Local Plan approach and timetable

Dear Graham,

Thank you for your email of 8th October updating us relating to your ongoing consideration of Chiltern and South Bucks Councils' consideration of whether or not to undertake a joint local plan. I have not felt able to comment previously as we had not received the further work you had indicated was being commissioned.

I have reviewed the paper commissioned from ORS and note that it continues to recognise the functional geography recommended and accepted by the Buckinghamshire authorities in March 2015, that is the identification of:

1. a Central Buckinghamshire housing market area and functional economic market area comprising Aylesbury Vale, Chiltern, and Wycombe; and
2. a Berkshire plus South Bucks housing market area and functional economic market area.

The position of South Bucks being drawn towards Berkshire is consistent with the analysis of the emerging Berkshire commissioned Strategic Housing Market Assessment. This also identifies South Bucks being linked within Berkshire, the difference being that Berkshire is not seen as a single housing market area but as two areas:

1. a western housing market area comprising Reading, Bracknell, West Berkshire and Wokingham; and
2. an eastern housing market area comprising Slough, the Royal Borough of Windsor and Maidenhead and South Bucks.

While no new analysis has been undertaken, the recently released travel to work areas further support South Bucks and Chiltern being drawn in different directions. I hope that we will be able to provide you with a copy of the updated Berkshire analysis soon.

Returning to the ORS paper, it clearly states that the decision whether or not to undertake a joint plan has no impact on the functional areas identified. I agree.

The paper continues to consider "best fit" approximations. It indicates that a joint plan is likely to lead to housing requirements and supply being considered across the joint plan area. As a result the best fit approximation should be applied to the local plan area. No explanation is provided as to why this is assumed. I note that the Planning Advisory Service technical note refers to best fit being to local authority boundaries. It argues that planning is mostly done at a local authority level and that many kinds of data are unavailable for smaller areas. Whilst clearly supporting best fit being to local authority boundaries, there is nothing within the PAS note that supports best fit being to a local plan area. I also note that the reference to the Planning Practice Guide on joint plans is within the context of two or more authorities cooperating within a single functional geography.

I will need to consider whether the preparation of a joint plan is unable to suitably consider two functional geographies. At present I see no practical reasons which would inhibit this. Local plans often recognise spatially varying needs and pressures, and direct development towards or away from specific areas. Data for both functional geographies is readily available.

My intention is to progress strategic planning as informed by evidence. Evidence endorsed by the Buckinghamshire authorities and that emerging from the Berkshire authorities both indicate that South Bucks, Slough and the Royal Borough need to work positively together. I intend to shortly send invitations to have regular meetings between us. I would expect these meetings to discuss housing and economic need and supply.

Please let me know if you would like to discuss this further or if you feel a round table meeting would be helpful.

Kind regards,

Peter

Peter Lerner
Interim Planning Policy Manager
Royal Borough of Windsor and Maidenhead
01628 796055

From: Ian Manktelow [mailto:ian.Manktelow@wycombe.gov.uk]
Sent: 21 October 2015 10:48
To: Graham Winwright
Subject: RE: Duty to Co-operate Request - Potential Changes to Chiltern and South Bucks Local Plan approach and timetable [OFFICIAL]

Graham

Thank you for sharing the report on the implications of preparing a joint plan on the extent of the “best fit” housing market area. From the evidence supplied it would seem that the most robust approach would be for the South Bucks/Chiltern Local Plan area to be included in the Central Buckinghamshire Housing Market Area, and we should seek to be evidence led. Clearly if the decision is made to not prepare a joint plan then South Bucks should remain within the Berkshire area.

The addition of South Bucks into the HMA has wider Duty to Cooperate implications particularly in relation to the issue of addressing unmet needs, and we will need to work together closely on this issue.

Kind regards.

Ian

Ian Manktelow
Team Leader, Planning Policy
Wycombe District Council
Council Offices
Queen Victoria Road
High Wycombe HP11 1BB
01494 421579