



Wycombe District Local Plan Examination

Matter 3: Housing Provision, Supply, Affordability and Gypsy and Traveller accommodation

June 2018

Introduction

0.1 The issue identified by the Inspector is:

Is the objectively-assessed need for housing soundly based, supported by robust and credible evidence and is it consistent with national policy? And will it be met during the Plan period?

1. Have the Housing and Economic Development Needs Assessments (HEDNA 2, HEDNA 3, and HEDNA 5) been positively prepared and are their conclusions in respect of housing soundly based and justified?

- 1.1 The HEDNA has been prepared in accordance with paragraph 159 and 47 of the NPPF and guidance set out in the 'HEDNA Methodology: assessing housing need' paragraphs 014 - 021 of the PPG¹.
- 1.2 The HEDNA is a joint study between the Buckinghamshire districts undertaken by ORS and Atkins. The geographical area of the study covers the Housing Market Area (HMA) and the Functional Economic Market Area (FEMA). The definition of the HMA was the subject of specific evidence based work and collaboration under the Duty to Cooperate². The Housing OAN has been established for the HMA, as well as individual districts. Prior to defining the HMA, Wycombe District undertook a SHMA (HMA4) for the district, however this was superseded once the HMA/FEMA work defined a wider housing market area for the district.
- 1.3 The first published document was the Draft HEDNA (January 2016) which identified a housing OAN of 15,100 for Wycombe district and was consulted on as part of the Draft Local Plan consultation in June - August 2016 (HEDN5).

¹ PPG HEDNA Paragraph 014 ref ID 2a-014-20140306 Revision date: 06 03 2014 to paragraph 021 ref 2a-021-20160401 Revision date: 01 04 2016.

² See HMA1 HMAs and FEMAs in Buckinghamshire Updating the Evidence, HMA2 HMAs and FEMAs in Buckinghamshire The Impact of a Joint Plan for Chiltern and South Bucks, HMA3 HMAs and FEMAs in Buckinghamshire and the surrounding areas - report of findings and section 3 of TP2 Topic Paper 2 Housing.

- 1.4 The release by ONS and CLG of new household and population projections and estimates in mid-2016 prompted an update to the HEDNA³ resulting in a revised Housing OAN figure of 12,900 for Wycombe District.
- 1.5 The HEDNA Update erroneously excluded the impact of the adjustment for suppressed household formation rates from the OAN. As a consequence, a HEDNA Addendum⁴ was produced which corrected the housing OAN figure increasing the OAN by 300 dwellings for Wycombe district, giving a total OAN of 13,200 dwellings for the plan period of 2013-2033.
- 1.6 Since the Buckinghamshire HEDNA Update and HEDNA Addendum were published the draft revised NPPF has been published for consultation (April / May 2018). This includes a new standardised methodology for calculating the OAN, taking forward the Government's consultation paper in 14 September 2017 "Planning the right homes in the right places". The revised NPPF is due to be published by the end of July 2018. Transitional arrangements indicate that the current NPPF (and hence current PPG methodology) will be applied for plans submitted up to six months after the revised NPPF is published (January 2019 if published in July 2018). As such, the standardised methodology has not been used for the OAN.
- 1.7 The starting point for calculating the OAN is the latest Household Projections produced by the MHCLG. Adjustments were then made, as per the PPG advice, to take account of local circumstances. These included making changes to reflect the local demography through sensitivity testing. Consideration was then given as to whether the adjusted household projection should be uplifted to either reflect market signals or to ensure that there were enough workers (labour supply) for the forecast additional jobs – the higher of these two was then applied.

³ HEDN3 Buckinghamshire HEDNA update 2016

⁴ HEDN2 Buckinghamshire HEDNA Addendum

- 1.8 The text below sets out where adjustments have been made or considered, these are all set out in more detail in the Housing Topic Paper paragraphs 4.11 – 5.19. ‘Amended Figure 122’ of HEDN2 sets out the calculations for each adjustment made for the OAN.

Adjustments made to 2014 CLG Household Projections Household Projections

- **Migration trends** – Household Projections have been adjusted to be based on a 10 year migration trend, rather than 5 years. This responds to local circumstances across Buckinghamshire. This approach helps to smooth out peaks and troughs in projections and is also the approach taken by the Central trend projections issued by the Greater London Authority in July 2017. This results in a downward adjustment of minus 439 households for the plan period for Wycombe District.⁵
- **Unattributable population change (UPC)** is factored into the population projections. Early work on the Wycombe SHMA 2013 (HMA4) highlighted this as an issue most likely linked to the historic undercounting of international migration. Pages 61 – 63 of HEDN3⁶ sets out why UPC adjustments have been made for Wycombe, resulting in an increase in population projection.
- **Allowance for transactional vacancies and second homes.** An additional 371 dwellings for the plan period has been included to take account of homes which are either vacant or used as a second home. This is derived from the 2011 census statistics.
- **Market Signals** - A 20% uplift to the OAN has been made to take account of market signals. This is the same as in adjoining Chiltern and South Bucks districts. The uplift in Aylesbury Vale is 10%, resulting in an average market signal uplift of 15% across

⁵ For further details on the use of the 10 year trend see Amended Figure 122 of HEDN2 Buckinghamshire HEDNA Addendum, pp. 64-65

⁶ HEDN3 Buckinghamshire HEDNA update 2016 pp. 61 - 63

the HMA. This is a significant uplift to the OAN. HEDN3⁷ provides an assessment of the market signals. This is considered an appropriate uplift based on affordability and rates of development and also when looking at comparative Council areas⁸.

- **Balancing of jobs and Homes** - The Oxford Economics employment forecast has been used to forecast the number of new jobs created. The uplift required to ensure a balance of jobs and homes is less than the 20% uplift for market signals, as such, no further uplift has been applied. The uplift for employment requires an 11.4% increase (1,254 households), compared to 1,901 households for a 20% uplift for market signals⁹. A number of employment forecasts and scenarios were considered, see Matter 4, Q1 for further details.
- **Supressed household formation rates** – No direct adjustment is made to the 2014 based CLG household representative rates to take account of the suppression in a particular age group in the household projections, as this is included as part of the uplift for market signals instead. The HEDNA does however make an adjustment for concealed families and homeless households, which results in an additional 284 dwellings for the plan period.¹⁰

Other 'shortfalls' factors

1.9 The HEDNA also considers '**shortfalls.**' These are defined as the under provision in housing that have accrued against previous development plan targets. The PPG makes no mention of 'shortfalls' in housing delivery from earlier periods having to be made up, and consequently it is assumed that, as suggested by the PAS Good Plan Making Guide that Strategic Housing Market Assessments (the housing element of the HEDNA) should 're-set the clock' and provide a new

⁷ HEDN3 Buckinghamshire HEDNA update 2016, pp. 148 - 159

⁸ See paragraph 7.96 of HEDN3 Buckinghamshire HEDNA update 2016 and paragraphs 4.34 – 4.39 of the TP2 Topic Paper 2 Housing for further details

⁹ Amended Figure 122 in HEDN2 Bucks HEDNA Addendum pp. 64 – 65

¹⁰ See Amended Figure 122 in HEDN2 Bucks HEDNA Addendum, p. 42

baseline assessment of all housing need, therefore no shortfall has been included. In any event, as paragraphs 4.41-4.43 of the Housing Topic Paper indicate, at the base date of the Plan and the OAN, there was a surplus rather than a shortfall against the prevailing development plan target.

- 1.10 The **'backlog' of affordable housing** need is in effect the unmet affordable housing need, as at 2013 i.e. the unmet needs of homeless and other households living in unacceptable accommodation. To count a backlog at a more recent point would introduce double counting, and it is for this reason that we have used data from 2013, the start of the Plan period. This 'backlog' of need is included within the market signals. See Matter 3, Q13 for more detail.
- 1.11 **Housing OAN uplift for Affordable Housing.** The PPG requires for a consideration of whether there should be an uplift to the OAN to ensure delivery of the affordable housing need, as a "policy on" consideration.¹¹ The Plan does not propose such an increase. This is explained further in paragraphs 5.15 – 5.19 of the Housing Topic Paper. In any event the proportion of the OAN that is affordable housing equates to 3,100 dwellings, approximately 23% of the OAN. The HELAA¹² and Housing topic paper¹³ assesses the potential supply of affordable housing arising from the requirements of Policy DM24 and concludes that this is very close to the assessed need.¹⁴
- 1.12 The approach to the HEDNA has been tested at a number of Section 78 Appeals, particularly in Aylesbury Vale. These include planning appeals at land west Of Castlemilk, Moreton Road, Buckingham¹⁵, Land east of Buckingham, Stratford Road¹⁶ and Land adjacent to 80 Long Chilton

¹¹ PPG HEDNA Paragraph: 029 Reference ID: 2a-029-20140306

¹² HELS1 HELAA - Publication Version

¹³ TP2 Housing Topic Paper, p. 25

¹⁴ See the Council's response to question 14 of this Matter

¹⁵ APP6 Appeal Decision - Land west of Castlemilk, Moreton Road, Buckingham (APP/J0405/V/16/3151297)

¹⁶ APP1 Appeal Decision - Land east of Buckingham, Stratford Road (APP/J0405/W/17/3175193)

Road, Long Crendon, Buckinghamshire¹⁷ where the OAN was examined in detail. In all cases the Council's OAN was accepted by the Inspectors as the appropriate figure to use to assess the Council's 5 year housing land supply position and this was also supported by the Secretary of State in the Castlemilk case. The Inspector at the most recent appeal decision for Land east of Buckingham, Stratford Road concluded 'I attach considerable weight to the recent findings of the Secretary of State with regard to the HEDNA'.¹⁸

- 1.13 It is therefore considered that the conclusions of the HEDNA (HEDN2, 3 and 5) are soundly based and justified, in that they represent the most appropriate approach for the District.

2. Is the objectively-assessed need for housing (OAN) of 13,200 additional dwellings over the plan period (660 dwellings per annum) based on robust and up-to-date evidence?

- 2.1 The starting point of the HEDNA is the most up-to-date CLG Household projections 2014. These are themselves informed by the 2014-Sub National Population Projections, which were also used in the HEDNA. The HEDNA also utilises the Household Formation Rates from the 2014-CLG household projections, which are considered both robust and reliable. This approach accords with the approach set out in the PPG¹⁹ and is therefore justified.
- 2.2 On 24 May 2018, the ONS released 2016-Sub-National Population Projections, but the associated Household projections are not scheduled for release until later this year. It is clear from the PPG²⁰ that whilst a meaningful change in the housing situation such as new projections should be considered, it does not automatically mean that

¹⁷ APP3 Appeal Decision - Land adjacent to 80 Long Chilton Road, Long Crendon, Buckinghamshire (APP/J0405/W/16/31425254)

¹⁸ Paragraph 23 of APP1 Appeal Decision - Land east of Buckingham, Stratford Road (APP/J0405/W/173175193), p. 6

¹⁹ PPG HEDNA Paragraph: 015 ref ID: 2a-015-20140306 Revision date: 06 03 2014

²⁰ PPG HEDNA Paragraph: 016 ref ID: 2a-016-20150227 Revision date: 27 02 2015

housing assessments are rendered outdated every time new projections are issued.

- 2.3 Use was also made in the HEDNA of Mid-Year Estimates up to and including 2015. Estimates from 2012-2015 were subsequently revised slightly downwards in Wycombe by the ONS in March 2018 along with the release of the 2016 Mid-Year Estimates.
- 2.4 HEDN3 establishes the market signals adjustment with reference to ONS produced house price data up to 2016, DCLG affordability ratios up to 2015, and local rent data from 2015-16.
- 2.5 All of the data utilised by the HEDNA was the most recent available at the time of writing, and no subsequent releases are considered to have made a meaningful change in the housing situation.

3. In order to meet the OAN for housing Policy CP4 (Delivering Homes) indicates that land will be allocated for 10,925 dwellings (550 per annum) to be constructed in Wycombe over the Plan period. How and where will the remaining 2,275 dwellings be delivered?

- 3.1 The plan sets a target to provide 10,925 dwellings, leaving a remaining 2,275 dwellings of unmet housing need to meet the OAN. The strategy identifies that this unmet housing need will be met in Aylesbury Vale, through the Vale of Aylesbury Plan (VALP) which is also at examination stage²¹.
- 3.2 There is no indication in Policy S2 of the VALP as to where in Aylesbury Vale Wycombe's housing needs will be met. However, the VALP strategy allocates over half (16,398 dwellings) of the housing target (27,400 – which includes unmet needs) to Aylesbury which is located towards the south of their district. This is in close proximity to Wycombe district, which adjoins the south of Aylesbury Vale, providing strong links and connections to towns and villages within Wycombe district.

²¹ See Policy S2 of DPD14 Proposed Submission Vale of Aylesbury Local Plan 2013-2033, p. 34.

Aylesbury town is not just in the same “best fit” housing market area but also in the same functional housing market area as Wycombe District, ensuring that there are strong commuting and migration connections.

- 3.3 The allocation of 2,275 unmet housing need has also been agreed through a Memorandum of Understanding and Bilateral Agreement. In July 2017 a Bucks wide MoU²² was signed between all Buckinghamshire districts and the Bucks Thames Valley LEP. This was then later reconfirmed in a Bilateral Agreement between Wycombe District Council and Aylesbury Vale District Council in January 2018²³.

4. Will there be a 5 year supply of housing for the duration of the Plan period, how has this been calculated and is the delivery profile realistic?

- 4.1 The housing trajectory²⁴ assesses supply against the plan target and shows that there will be a rolling 5 year supply throughout the plan period²⁵. In the first 5 year period 2018-23 there is 6.9 years; in years 2023-28 there is 6.3 year supply and in the last 5 years 2028-33 there is 5.1 years of supply.

How the 5 year supply has been calculated?

- 4.2 The 5 year supply has been calculated against the plan requirement of 3,082 dwellings for the first 5 year period (2018-23). Undersupply from past under delivery from the start of the plan period (2013) has been spread across the first 5 years using the ‘Sedgefield’ approach. A 5% buffer has then been added. The Council does not consider there has been persistent under delivery and therefore a 20% buffer is not

²² Table 3 of MOU5 Memorandum of Understanding between AVDC, WDC, CDC, SBDC and BTVLEP July 2017, p. 3

²³ MOU10 Memorandum of Understanding between Aylesbury Vale District Council and Wycombe District Council in relation to the Vale of Aylesbury Local Plan and Wycombe District Local Plan

²⁴ HELS1.7 Housing and Economic Land Availability Assessment - Publication Version - Appendix 7 - Housing Trajectory

²⁵ See Appendix 1 of this Matter for calculations. ²⁵ The housing supply is set out in the HELAA, Appendix 7 (HELS1.7) which informs the submission version of the Plan. Since then a new AMR (HELS7) has been published. This updates the HELAA base date from March 2016 to March 2017. The AMR is the latest information available and informs the current assessment of housing supply. Appendix 1 sets out 5 year housing land supply calculations both for the 2016 based HELAA assessment, and the 2017 based AMR supply.

appropriate. See the Housing Topic Paper²⁶ for further details. Since the Topic Paper was published a further year of housing completions for 2016/17 has been collected indicating 788 net dwelling completions. This further supports the view that there has not been persistent under-delivery²⁷.

Is the delivery profile realistic?

- 4.3 The delivery profile is set out in the housing trajectory²⁸, this has since been updated with a further year of housing completions for 2016/17²⁹. This shows a strong housing delivery over the first 10 years of the plan period in particular, as a result of key sites delivering at different points in that period. In the first 5 years (2018-23) there is a stock of permissions which are expected to be completed in the next 3 to 5 years. There is also a strong delivery of PDL sites, the commencement of the former reserve sites that have been released for development at the end of 2014 and greenfield AONB sites. In the next 5 year period 2023-28 the key sites are the completion of the former reserve sites, the commencement of the Princes Risborough expansion area and the main delivery period for the release of Green Belt. The last 5 years of the plan includes the completion of the larger Green Belt sites and the continuation of the Princes Risborough Expansion Area. As such, there is a good spread of significant sites that make up the delivery profile across the plan period.
- 4.4 The Princes Risborough expansion area is the largest site in the trajectory. The 'Housing Delivery Study for Buckinghamshire'³⁰ specifically tested lead in times and delivery rates for the Princes Risborough expansion area.

²⁶ Paragraphs 7.8 – 7.14 and Table 6 in TP2 Housing Topic Paper

²⁷ Paragraph 20 in HELS7 Wycombe Monitoring Report Monitoring Period 1 April 2015 to 31 March 2017 pp. 5-6

²⁸ HELS1.7 HELAA Publication Version - Appendix 7 - Housing Trajectory

²⁹ HELS7 Wycombe Monitoring Report March 2018

³⁰ HELS8 Housing delivery study for Buckinghamshire

- 4.5 Two scenarios were tested, the more conservative scenario has been used to take into account significant infrastructure requirements. This results in an average build out rate of 157 dwellings per annum, with 599 dwellings being delivered beyond the plan period. This build rate has been calibrated against a national study on build rates for large sites.³¹ The subsequent successful Housing Infrastructure Fund (HIF) bid to support delivery of early road infrastructure further supports the robustness of the Council's position.
- 4.6 The supply also provides a mix of site types. Just under 50% of sites are previously developed sites, mainly in the larger towns and villages, with the remainder being greenfield.
- 4.7 The supply includes a range of different sizes of sites, the importance of which is highlighted in both the Housing White Paper and draft revised NPPF. Nearly 40% of the housing supply is on sites of up to 100 dwellings, and around 15% on sites of under 10 units. This provides opportunities for different, smaller scale developers to be actively delivering in the local market, alongside volume builders on the larger sites. It also provides opportunities for self and custom build. See Table 8 of the Housing Topic Paper³² for further details on site sizes.
- 4.8 In terms of spatial distribution there is a good distribution across the district focusing development around the most sustainable built up areas, reflecting the settlement hierarchy. The majority of development is focused at High Wycombe, the largest town within the District. Table 9 of the Housing Topic Paper³³ sets this out in detail.
- 4.9 The phasing of delivery has also been informed through contact with developers and their expected delivery rates.

³¹ For further details see HELS8 Housing delivery study, p. 30 – 35 and Paragraphs 6.67 – 6.69 in TP2 Housing Topic Paper

³² Table 8 in TP2 Housing Topic Paper

³³ Table 9 in TP2 Housing Topic Paper

5. Is the make-up of the housing supply justified and supported by robust evidence?

- 5.1 The housing supply is set out in the HELAA, Appendix 7³⁴, which informs the submission version of the Plan. Since then a new AMR has been published³⁵, this updates the HELAA base date from March 2016 to March 2017. The AMR is the latest information available and informs the current assessment of housing supply.
- 5.2 Sites in the housing supply³⁶ can be grouped into the following main categories:³⁷
- 5.3 **Sites under construction and permissions** - In the first 5 years the trajectory is made up of sites which are already under construction or with planning permission or where there is a clear indication of delivery within the 5 year period. Sites with planning permission are considered to be deliverable until the permission expires, unless there is clear evidence that schemes will not be implemented within five years (NPPF, footnote 11). Where information has been identified that a planning permission is not going to be implemented, these have been excluded from the supply.
- 5.4 **Former reserve sites** - 5 greenfield sites reserved for development in the Core Strategy (2008) (4 in High Wycombe and 1 in Bourne End), have been released for development at the end of 2014 due to the need for more housing. Over the last 3 years there has been extensive community consultation and evidence collected, including a transport, flood risk, ecology, heritage and green infrastructure studies, feeding into the preparation of development briefs.³⁸ Since the HELAA was published four of the five sites now have an adopted development brief

³⁴ HELS1.7 HELAA Publication Version - Appendix 7 - Housing Trajectory

³⁵ HELS7 Wycombe Monitoring Report March 2018

³⁶ See HELS7 Wycombe Monitoring Report March 2018

³⁷ Details on specific sites will be covered in the Council's response to Matters 7-10

³⁸ For further details see HELS1 Housing and Economic Land Availability Assessment (HELAA) - Publication Version p. 41 - 47

and planning applications have been submitted for Slate Meadow and Abbey Barn South.

- 5.5 **AONB greenfield sites** - The Plan allocates 4 greenfield sites within the AONB (2 at Stokenchurch and 2 at Lane End). The HELAA³⁹ demonstrates they are suitable, available and achievable. These sites are supported by landscape studies within the AONB Site Assessment report⁴⁰.
- 5.6 **Green Belt sites for release** - The Plan allocates 10 housing Green Belt sites. These are supported by a Green Belt Assessment (part 1⁴¹ and 2⁴²), where an assessment has been made which demonstrates there are exceptional circumstances for Green Belt release and that the sites are developable. The sites form part of the HELAA⁴³ which demonstrates they are suitable, available and achievable. Where Green Belt sites are within the AONB a landscape assessment has been carried out. See GB1.1 for site assessment proformas⁴⁴.
- 5.7 **Princes Risborough expansion area** - This allocation is supported by an extensive range of evidence. See Matters 8 and Princes Risborough Housing Topic Paper⁴⁵ for further details. The Council has been successful in gaining funding from the Housing Infrastructure Funding to help deliver the relief road required by the proposed expansion area. A concept plan for the expansion area has been published and is at the stage of detailed master planning.
- 5.8 Neighbourhood Plan allocations for the parishes of Longwick-cum-Ilmer and Great and Little Kimble. The Longwick Neighbourhood plan⁴⁶ has been 'made' where 4 of the sites have already received planning

³⁹ HELS1 HELAA Publication Version, pp. 30 - 31

⁴⁰ AONB1 Area of Outstanding Natural Beauty Site Assessment Report

⁴¹ GB2 Buckinghamshire Green Belt Assessment – Report: Methodology and Assessment of General Areas

⁴² GB1 Green Belt Part Two Assessment

⁴³ HELS1 HELAA Publication Version

⁴⁴ GB1.1 Green Belt Part Two Assessment - Appendix GB1: Individual Site Assessments - Steps 2 and 3

⁴⁵ TP6 Topic Paper 6 Princes Risborough

⁴⁶ DPD10 Longwick-cum-Ilmer Parish Neighbourhood Plan 2017-2033

permission, totalling 285 units of the 300 proposed. Kimble neighbourhood planning group are currently in the process of consulting on a number of site options before finalising their allocations.

- 5.9 All sites have been subject to consultation with key stakeholders, including Buckinghamshire County Council, Chilterns Conservation Board where a site is in the AONB or setting of the AONB and the Environment Agency for flood issues.
- 5.10 Windfall – The plan makes a windfall allowance for 559 dwellings. This is based on a 10 year average of past windfall completions for small sites (less than 5 dwellings), excluding residential gardens and Prior Approvals for office to residential conversion.⁴⁷
- 5.11 The HELAA assessment process and supporting technical studies (see Question 6 below for more details) provides a robust assessment of supply, and is considered to be the most appropriate assessment, in accordance with NPPF policy and PPG advice.

6. Are the allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraints and demonstrated to be economically viable?

- 6.1 The assessment of sites that were considered for allocation is comprehensively coordinated through the HELAA, although to reflect the differing issues in different locations, this is heavily supplemented by more detailed technical reports with respect to whether the site is a suitable location for housing⁴⁸. Each site assessed through the HELAA has a site pro forma which identifies any additional development constraints⁴⁹ (except where a site has planning permission that has commenced). Where there are constraints such as landownership, legal constraints, infrastructure constraints, a view has been taken whether

⁴⁷ See paragraphs 43 – 52 in HELS1 HELAA Publication Version

⁴⁸ See HELS1.1 Housing and Economic Land Availability Assessment - Publication Version - Appendix 1 - Report location for Site Appraisals

⁴⁹ HELS1.4 Housing and Economic Land Availability Assessment - Publication Version - Appendix 4 - Site Assessment Proformas (housing, employment & mixed use)

these can be overcome. In cases where a constraint cannot be realistically overcome the site has been rejected⁵⁰.

Site Assessment

- 6.2 The District is highly constrained by AONB (71% of the district) and Green Belt (48% of the district) and not all of the District can be adequately served by sustainable transport options. These considerations have formed the core methodology of the various site assessments.
- 6.3 The tailored approach of using different assessments for different constraints was taken to ensure robustness and a proportionate approach to the evidence⁵¹. It should be noted that where neighbourhood plans are in preparation and there is an intention to allocate sites in those plans, the site assessment work did not feed into allocations in the Local Plan, but instead informed the housing targets for the neighbourhood plan areas in the Local Plan.
- 6.4 With regards to the proposed expansion of Princes Risborough, the selection of the preferred option for the extent/quantum of the expansion of Princes Risborough was principally undertaken through the SA process⁵², drawing on an extensive supporting evidence base⁵³.
- 6.5 This resulted in less land for development than would be required to meet full OAN. As such, where the HELAA shows that a site is considered to be free from significant development constraints or where identified constraints can be realistically overcome, sites have been allocated in the Plan as a direct output of this assessment of constraints, and there was no secondary or SA process of site selection that followed this.

⁵⁰ See HELS1.3 Housing and Economic Land Availability Assessment - Publication Version - Appendix 3 - Rejected Housing Sites

⁵¹ This is explained fully in WDLP10.22 Statement of Consultation Appendix 22 - Sustainability Appraisal Clarification Note in response to Regulation 19 Representations.

⁵² See in particular section 5.3 and Appendix IV of WDLP2 Sustainability appraisal (SA) of the publication (regulation 19) draft of the Wycombe District Local Plan

⁵³ See the Council's response to Matter 8 for more information.

Development Constraints – Plan Allocations

- 6.6 Individual site policies identify how constraints are to be overcome⁵⁴. In cases such as HW8 'Land off Amersham Road' (SHZ0035) the site is in multiple ownership and the Council require a development brief to be written in order to bring forward comprehensive development of the site, which could also include adjoining land in Chiltern district. At BE2 'Hollands Farm (north)' (SBE0028) the site is in multiple ownership (but with only 2 main owners) and a new road is to be delivered to facilitate development. In both of these cases the sites are phased later in the housing supply to allow briefs to be written, legal agreements agreed to, and works to deliver essential infrastructure.
- 6.7 In the case of smaller sites, such as garage redevelopments, these also need legal agreements to address rights of way and the re-provision of parking elsewhere. Employment sites often require time to cease their current use, to move tenants and to terminate leases. Again, this is accounted for in the phasing of sites in the supply where such constraints are identified. In general these sites would be considered developable but not deliverable⁵⁵.
- 6.8 The largest proposed development within the District with significant development constraints is the Princes Risborough Main expansion area. It encompasses a number of different land interests and is dependent on the delivery of increased road capacity in the form of a relief road. The area is phased in the trajectory from 2024 to beyond the plan period in order to allow for delivery of key elements of the relief road, and to recognise the complexity of delivery across a number of land interests. See Plan policies PR3, PR4, PR6, PR7, PR8, and PR17⁵⁶. This includes the provision of new school(s), retail, community facilities, a relief road and allowances for future rail improvements and the relocation of existing businesses.

⁵⁴ The Council will return to these points in Matters 7-10.

⁵⁵ See NPPF paragraph 47 and footnotes 11 and 12

⁵⁶ This sets out arrangements for the equitable delivery of shared infrastructure.

Viability

- 6.9 To demonstrate economic viability the Plan is supported by two viability assessments, a general assessment of the viability of housing development across the District⁵⁷ and a specific assessment of the viability of the proposed expansion of Princes Risborough⁵⁸.
- 6.10 VIA1 includes both strategic sites and notional sites. Notional sites are not actual sites, but are developed by parameters that were between the Council and the consultants. The advantage of notional sites is that they can be created to reflect a series of unit numbers and densities⁵⁹ that might be experienced across the Wycombe District area, in such a way that maximises the chances of the outcomes reflecting most situations on the ground.
- 6.11 The methodology for the strategic sites is similar to that for the notional sites, in that it also uses a residual land appraisal to calculate a land value arising from the particular development, based on the housing mixes. In the case of the strategic sites, however, more site-specific criteria, such as infrastructure levels and abnormal costs for slopes are also applied.
- 6.12 VIA2 was developed to confirm that the value generated by the major expansion of Princes Risborough can fund the infrastructure package and other obligations here. It demonstrated that the three main land promoters/groups of parcels can easily accommodate these costs in addition to the typical development costs expected for a scheme of this scale as well as CIL and still generate a cumulative project surplus / headroom of almost £70m. The approach proposed a fair distribution of obligations based on achieving equalised residual land values across the three land holdings. The Plan is also supported by a commercial assessment of potential new employment allocations⁶⁰.

⁵⁷ VIA1 Wycombe District Council Viability Assessment

⁵⁸ VIA2 Princes Risborough Expansion Viability Report

⁵⁹ Paragraph 3.40 of VIA1 WDC Viability Assessment, pp. 22-23

⁶⁰ HELS12 Wycombe commercial assessment and HELS13 Wycombe commercial assessment Part 1 - Princes Risborough

7. Will the Plan be an effective mechanism for delivering the housing requirements contained in Policy CP4?

- 7.1 Yes, the vast majority (93%) of the supply right up to 2033 is on identified sites, either in the form of commitments or allocations in this plan. Allocations are reflected in the breakdown of housing provisions for the different settlement tiers.
- 7.2 The Plan is also not heavily reliant on either windfall forecasts (approximately 5% of the supply), nor broad areas (less than 2% of the supply). Broad locations are identified for Kimble and Longwick parishes, where Neighbourhood Plans are being prepared. The Longwick-cum-Ilmer Neighbourhood Plan has now been adopted (27 March 2018). See Matter 3, Q5 for further details on what is included to make up the windfall allowance. For further detail on broad locations see Table 10 (Great and Little Kimble) and Table 11 (Longwick) of the HELAA (HELS1). Housing delivery will also be assisted by the good range of site sizes making up the supply, and the broad geographical distribution of sites.
- 7.3 See Matter 3 Q13 – 15 for how CP4 will be effective for delivering affordable housing and Q16 – 17 for how CP4 will be effective for delivering Gypsy and traveller provision.

7a. Are the site allocations available and deliverable within the anticipated timescales?

- 7.4 Yes, each site has been identified to be available within the anticipated timescales. All landowners/developers have been contacted to confirm availability, many of which have submitted a representation to support the deliverability of a site. Larger sites which require greater infrastructure provision have placed later in the housing trajectory to take into account longer lead in times. Sites within the Green Belt are phased towards the end of the 5 year period and beginning of the 6 – 10 year period to take into account the site must be released from the Green Belt before any development can take place. The two larger Green Belt sites have been phased in 6 – 10 years. AONB greenfield

sites are less constrained and therefore anticipated to come forward within the first 5 years. The Princes Risborough expansion area requires significant infrastructure and has multiple landowners and is therefore not anticipated to commence until 2024, although the recent announcement of Housing Infrastructure Fund award to the expansion area should assist in early delivery.⁶¹

7b. Should the Plan include a policy for the phased release of land for housing?

- 7.5 It is not the intention to ‘micro-manage’ the release of sites. The housing trajectory shows a consistent supply of sites across the plan period, albeit higher rates of delivery at the beginning of the plan period. As set out in Matter 3, Q4 there is a 5 year supply of sites throughout the plan period.

8. Will Policy DM22 (Housing Mix) be an effective mechanism for delivering an appropriate mix of housing types, sizes and tenures?

- 8.1 TP2 Housing Topic Paper contains a summary of the OAN, a breakdown of affordable housing need, and assessment of older person’s accommodation needs, and an assessment of housing needs of other groups in the community, including people with disabilities and self-builders⁶².
- 8.2 The first part of DM22 is drafted not only to flex the mix of dwelling size, type and tenure to respond to up-to-date evidence on housing needs and delivery, but also to have regard to the place making dimensions of housing mix. As set out in the supporting text⁶³, at the present moment there is little immediate need to interfere with open market provision in terms of size or type, but the Council will need to monitor this situation over the life of the Plan. This conclusion applies equally to the provision

⁶¹ For further details see HELS8 Housing delivery study for Buckinghamshire, pp. 30-35

⁶² TP2 Topic Paper 2 Housing, for relevant sections see: OAN (section 4), affordable housing need (section 5), older persons accommodation (paragraphs 8.14-8.15), and other groups (section 9).

⁶³ Paragraphs 6.17 and 6.18 of DM22, WDLP1 Wycombe District Local Plan

of older person's accommodation – where supply has kept pace with demand without specific policy requirements or plan allocations.⁶⁴

- 8.3 TP2 topic paper 2: Housing paragraphs 9.9 – 9.12 also assesses the likely effectiveness of the second part of DM22 (Housing Mix) – self-build plots. This concludes: Table 7 of the Plan⁶⁵ that just under 60% of our housing supply is likely to come forward on sites of 100+ units and these sites will be in accordance with DM22 and expected to provide 5% for self-build or custom-build. The application of this policy should be more than adequate to deal with the identified interest which is less than 2% of the total supply. If 5% is applied to sites of 100+ units identified in the plan, this will provide 327 plots, compared to expressions of interests amounting to 194.

9. Will Policy DM21 (Location of New housing) and Policy DM27 (Housing for Rural workers) provide an appropriate framework for managing the location of new housing development?

- 9.1 Policy DM21 is drafted to implement the strategies set out in Policies CP3 and CP4 (and the various site allocations that flow from these). Policy DM44 (Development in the Countryside Outside of the Green Belt) cross refers to DM21 in point 1d. These policies work together to direct new housing to locations where new housing can contribute to sustainable development (allocated sites and windfall sites in sustainable settlements). Policy DM27 (Housing for Rural Workers) allows appropriate exceptions to this for rural workers whose functional accommodation needs cannot be met in locations consistent with DM21/DM44.

⁶⁴ Affordable Housing needs are to be secured via Policy DM24 of the Local Plan

⁶⁵ WDLP1 Wycombe District Local Plan, p. 50

Other Housing Policies

10. Will Policy DM23 (other residential uses) provide an effective mechanism for assessing proposals for hotels and houses in multiple occupation?

10.1 Policy DM23 has been drafted to respond to local experience of typical issues arising from these forms of development. Parts 1 and 2 are intended to establish some clarity that such uses are generally acceptable in residential areas, but not when this would result in an overconcentration. Part 3 highlights a number of common design and layout issues relating to development of this type. Part 4 cross refers to national policy for main town centre uses, which will be relevant to hotel uses. Part 5 addresses the need for communal facilities within HMO buildings. The Council considers that DM23 provides an effective mechanism to control the location of such uses, relevant design and layout issues, and critical quality of life issues for occupants.

11. Do Policies DM36 (Extensions and alterations to existing dwellings), DM37 (Internal space standards) and DM41 (Optional technical standards for building regulation approval) provide an appropriate mechanism for the design of new, extended and altered dwellings.

11.1 The first of these policies (DM36) addresses familiar issues of scale, form and appearance relevant to householder development in part 1. The design of *new* houses will be assessed against DM35 and the Residential Design Guidance SPD, and the next review of the SPD is likely to include design guidance for house extensions tailored to DM36. DM36 Part 2 is drafted to respond to a specific issue relating to the use of householder applications in connection with de facto proposals for new dwellings.

11.2 DM40 and DM41 relate to Technical Housing Standards. As set out in paragraph 6.194 of the Plan, following the Government's Housing Standards Review of 2015 there has been a partial 'joining up' of the planning and building regulations in connection with these issues.

- 11.3 As drafted, paragraph 6.197 of the Plan links to the current nationally described space standards and paragraph 6.203 cross refers to the relevant part of the building regulations. For improved convenience and accessibility to the relevant information, the Council is likely to either incorporate the substance of these technical requirements within an appendix to the plan (as an additional minor modification), or within a review of the Residential Design Guidance SPD.
- 11.4 Taken together, it is considered that these policies and SPD will provide an effective mechanism for the design of new, extended and altered dwellings.

12. How will the need for specialist housing contained in Policy CP4 be met?

- 12.1 Policy CP4 refers in 3b) to the provision of accommodation for older people, a specialist housing group, whose needs will be met through existing commitments, on sites allocated for housing and through ensuring new housing is more accessible.
- 12.2 The Housing Topic Paper⁶⁶ signposts the reader to where the need for accommodation for older people and its supply is set out. The supply data is updated in the AMR⁶⁷.
- 12.3 The Buckinghamshire HEDNA⁶⁸ identifies that the increase in the over 75 age group results in a need for an additional 1,790 dwelling units. The majority of this need is for private accommodation which, will form part of the overall OAN, and could be met in a number of ways either through people remaining in their own homes, moving to adaptable independent accommodation or as part of a mixed extra care development. The HEDNA also identifies a need for institutional or C2

⁶⁶ Paragraphs 8.14 - 8.15 in TP2 Topic Paper 2 Housing

⁶⁷ Paragraphs 91 - 92 in HELS7 Wycombe Monitoring Report, pp. 21 - 22

⁶⁸ Figure 131, HEDN3 Buckinghamshire HEDNA Update 2016 - report of findings, p. 174

accommodation of 590 bedspaces for older people aged over 75 (which is excluded from the OAN)⁶⁹.

- 12.4 The HELAA⁷⁰ states that people in institutional accommodation are not counted in the C3 housing land supply in the same way as they are not included in the OAN. Set against the identified need of 590 bedspaces, we currently have committed schemes which will deliver 944 bedspaces⁷¹ of which 372 bedspaces⁷² are already completed or under construction since the base date of the Plan⁷³. This updates the position in the Housing Topic Paper⁷⁴ which concluded that the demand and supply for C2 elderly person accommodation was quite close, where now there is some headroom. Consequently the Plan makes no specific allocations to meet this need as we are relying on schemes already in the pipeline.
- 12.5 This is complemented by the proposed Development Management approach (DM23 and DM41) which allows for windfall C2 development in locations which are acceptable for C3 housing, and which require a proportion of new housing to be to the higher accessibility standards, supporting the preference of many older people to remain in C3 private dwellings.

⁶⁹ Figure 132, HEDN3 Buckinghamshire HEDNA Update 2016 - report of findings, p. 175 and paragraph 8.48 of the same document.

⁷⁰ Paragraph 159 in HELS1 HELAA - Publication Version, p. 160

⁷¹ HELS7 AMR includes 482 bedspaces. In addition planning permission has been granted for an additional 462 bedspaces in 166 units on the former Wycliffe Centre in Horsleys Green 17/08285/FUL in March 2018.

⁷² The detailed analysis figures on which the completed, permitted and under construction C2 developments figure of 263 bedspaces are based are set out in HELS1.9 HELAA Publication Version - Appendix 9 - C2 Completions 2013-16 and HELS7.1 Wycombe Monitoring Report Technical Appendices pp. 69 - 71.

⁷³ The AMR updates the figures set out in the Housing Topic Paper (TP2) in paragraph 8.14 on page 73.

⁷⁴ Paragraph 8.15 of TP2 Topic Paper 2 Housing.

13. Have the Housing and Economic Development Needs Assessments (HEDNA 2, HEDNA3, and HEDNA 5) been positively prepared and are their conclusions in respect of affordable housing soundly based and justified?

- 13.1 The HEDNA has been positively prepared with regard to affordable housing on a relatively stringent, but PPG consistent, assessment of affordability⁷⁵.
- 13.2 The overall housing need includes the need for both market housing and affordable housing. Based on the OAN figures in the HEDNA Addendum (HEDN2) the affordable housing need figure for Wycombe District is 23% (3,100 of the 13,200 total housing need for the district). The majority of this need is for rented accommodation (85%).
- 13.3 HEDN 2, 3 and 5 have accurately captured the unmet needs of households living in unacceptable accommodation at the start of the Plan period (including homeless households and concealed families who are not included in the household projections) together all needs projected to arise over the 20-year period 2013-33. Therefore, the needs of all households have been counted in the OAN, regardless of whether or not they are able to afford their housing costs. Meeting the identified need for affordable housing will result in some housing currently occupied by established households being released back to the market. This affects the balance between market housing and affordable housing, but it does not increase the overall number of homes needed. For example, an established household in an overcrowded private rental property who was unable to afford suitable housing would, if provided with affordable housing, vacate the market housing that they currently occupy. Therefore, meeting the affordable housing need in full would, as set out in the TP2 (Housing Topic Paper)⁷⁶ offset the need to provide some market housing that would

⁷⁵ See pages 89-94 of HEDN3 Buckinghamshire HEDNA Update 2016 - report of findings.

⁷⁶ Paragraph 5.15-5.19 in TP2 Topic Paper 2 Housing, pp. 26-27

otherwise be needed – the overall objectively assessed need includes the affordable housing need in full.

- 13.4 It is important to note that the HEDNA Update (HEDN3) does not rely upon the private rented sector as a means of reducing affordable housing need; instead, it recognises that households in receipt of housing benefit can afford to access suitable housing in the market as they receive a welfare payment specifically for this purpose, so it would be inconsistent with the PPG to count these households as needing affordable housing. The PPG is explicit that “care should be taken...to include only those households who cannot afford to access suitable housing in the market”⁷⁷.
- 13.5 The HEDN2 does caution that if this payment was withdrawn, this would have a substantial impact on the affordable housing need; but the Government has not suggested that there is any intention to universally withdraw housing benefit from those households in the private rented sector, and it is included in the Office for Budget Responsibility long-term economic forecasts. As such, the 23% minimum affordable housing need figure, as calculated in HEDN2, represents the level required to meet the affordable needs of current and future households without increases to the number of households in the private sector in receipt of housing benefit.
- 13.6 The same approach was recently considered by the Luton Local Plan Inspector, who concluded that the need for affordable housing was “based on a robust analysis on the SHMA which takes into account unmet needs and projected future needs”⁷⁸. This approach has also been considered by Local Plan Inspectors at Bath and North East Somerset, Cheshire East, Stevenage, and Redbridge, and Inspectors at numerous planning appeals. None have criticised the methodology and, as such, the approach is considered to be justified.

⁷⁷ PPG HEDNA Paragraph: 024 Reference ID: 2a-024-20140306 Revision date: 06 03 2014

⁷⁸ Paragraph 173 of the Report to Luton Borough Council (PINS, August 2017)

14. Are the affordable housing requirements identified in Policy DM24 (Affordable Housing) deliverable and justified by robust viable evidence? And how will the affordable housing need of 3,100 dwellings be met?

- 14.1 Policy DM24 requires all developments of 10 or more dwellings or more than 1,000 square metres of residential floorspace to provide on-site Affordable Housing. The PPG⁷⁹ enables local planning authorities to apply lower affordable housing thresholds in rural areas designated under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty. Consequently, the district council is only able to apply the lower threshold to the rural parishes that fall within the Chilterns AONB. Within the Chilterns AONB, the Plan applies a lower threshold such that residential developments of 6-10 dwellings and/ or more than 1,000 sqms are required to provide a commensurate financial contribution towards the provision of affordable housing.
- 14.2 It is important that new residential development meet the identified needs of the District. HEDN2⁸⁰ identifies that for the plan period there is a need for 3,100 affordable homes or 23% of the full objectively assessed housing need. The majority of this need is for rented accommodation (85%)
- 14.3 The percentages of affordable housing required for residential purposes set out in the Plan are 40% Gross Internal Area (GIA) for greenfield land or sites that were last used for employment or a similar sui generis employment generating use and 30% GIA for all other sites. The reason for the difference between the percentages is that greenfield sites and sites that were last used for employment purposes tend to have a lower existing use value and consequently are likely to be more viable than sites that were previously used for residential purposes (residential intensification sites), for example, where existing use land values tend

⁷⁹ Planning Obligations paragraph 031 reference ID 23b-031-20161116 Revision date: 16 11 2016

⁸⁰ Figure 123, HEDNA Addendum report, p. 43.

to be higher. The need and land supply situation justifies a higher requirement for these types of sites⁸¹.

- 14.4 The reason for using GIA in Policy DM24 is because it is considered to result in a more proportionate measure in terms of the overall level of development provided on a site. Residential schemes vary in terms of the types and mix of units as well as the size of the same types of dwellings. Using floorspace as a measure is also a simpler method of calculation and is the same basis used for both Community Infrastructure Levy and viability assessments. The Council's current Core Strategy policy is based on bedspaces, which is also aimed at ensuring a proportionate approach, and this approach has been supported at the Core Strategy examination⁸² and the previous Local Plan inquiry⁸³.
- 14.5 The viability of these requirements was tested in VIA1 WDC Viability Assessment, which appraised various different Affordable Housing percentages (10%, 20%, 30%, and 40%) against a range of baseline land values according to location and existing uses and a number of types of sites. This concluded (section 5) that the proposed affordable housing requirements would be viable, considered cumulatively with CIL and other policy requirements, with the possible exception of residential intensification sites in higher value areas. However, it is clear from the Viability Report⁸⁴ that no account is currently taken of vacant building credit (VBC) and that taking this into account is likely to increase the viability of residential intensification sites in particular. VBC operates as a discount against the policy level of affordable housing, based on the extent of existing development. On a site specific basis there would therefore be a direct viability link between EUV and VBC, as both are derived from the extent of existing development. As a natural outcome of the VBC regime, the impact of affordable housing policy requirements

⁸¹ HELS1 Housing and Economic Land Availability Assessment (HELAA) - Publication Version

⁸² Paragraph 3.104 in DPD5 Report on the Examination of the Wycombe Core Strategy Development Plan Document, p. 33.

⁸³ See paragraph 3.11.13 in DPD7 Wycombe District Local Plan Inquiry - Inspector's Report, p. 234

⁸⁴ Paragraph 4.4.10 in VIA1 WDC Viability Assessment, p. 30

on residential intensification sites is moderated dynamically to the EUV of the specific site.

14.6 The Housing Topic paper⁸⁵ addresses the issue of how the need for 3,100 dwellings will be met. It estimates approximately how much affordable housing may come forward from sites of 10 or more dwellings based on a tenure split from the HEDNA⁸⁶ of 80:20 between rented accommodation and shared ownership. This is summarised in Table 3 below:

Table 3. Affordable Housing Supply⁸⁷

	Shared ownership	Rented	Unknown Tenure	Total
Completions	38	126	0	164
Permissions at base date	194	246	28	468
Supply	466	1,967	0	2,433
Totals	698	2,339	28	3,065

14.7 The affordable housing supply is estimated to be around 3,065 units in the period 2013-33 compared to the need of 3,100. The estimated supply is within 1% of the estimated need. Whilst the need has been shown to be met for the vast majority of this supply, it is important to note that there are other factors that could affect the supply.

14.8 Of the 3,065 above, around 335 could potentially be subject to vacant building credit, which allows vacant floor space to effectively be taken

⁸⁵ Paragraphs 5.10 – 5.13, TP2 Topic Paper 2 Housing, pp. 24-26

⁸⁶ HEDN3 Buckinghamshire Housing and Economic Development Needs Assessment Update 2016 - report of findings

⁸⁷ Table 3 in TP2 Topic Paper 2 Housing, p. 25. The policy does not apply to sites with Prior Notification, office to residential permitted development, so these types of sites do not contribute to affordable housing supply unless they later seek planning permission and so are excluded from Table 3.

off the amount of floor space assessed to determine the amount of affordable housing required to meet policy requirements. No account was taken in the Whole Plan Viability Report⁸⁸ of vacant building credit and consequently this would improve the viability of some sites that contain previously developed land, such as, for example, residential intensification sites.

- 14.9 The Buckinghamshire wide Memorandum of Understanding (MoU)⁸⁹, July 2017 takes account of the fact that there could potentially be unmet affordable housing need in the three southern districts of Buckinghamshire, albeit in Wycombe's case this is anticipated to be a relatively small amount. The Councils agreed in the MoU that, "the affordable housing need within the HMA would first fall to be met within each corresponding plan area, subject to land availability." It was further agreed that "Aylesbury Vale District Council, working with Wycombe, Chiltern and South Bucks district councils, will enter into joint working arrangements that will aim to allow residents to have access to an appropriate element of affordable housing to be provided within housing developments in Aylesbury Vale District."⁹⁰

15. Does Policy DM25 (Rural Exceptions Affordable Housing) provide a clear and consistent framework for securing affordable housing on rural exception sites?

- 15.1 The NPPF⁹¹ advises local authorities to plan housing development to reflect local needs, particularly for affordable housing, including through the provision of rural exception sites. In addition it states that they should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.

⁸⁸ Paragraph 4. 4.10 in VIA1 WDC Viability Assessment, p. 30

⁸⁹ WDLP8.1 Wycombe District Local Plan and the Duty to Cooperate Report Appendix 1 - Memoranda of Understanding

⁹⁰ Section 2.1 in MOU5 Memorandum of Understanding between AVDC, WDC, CDC, SBDC and BTVLEP July 2017

⁹¹ NPPF paragraph 54

- 15.2 It is considered that Policy DM25 meets the national policy requirement by allowing small scale rural affordable housing in rural communities. The affordable housing provided on rural exception sites, as set out in 1a), should only be used to meet a clearly identified local housing need and should be subject to strict occupancy clauses. The number, size and tenure mix of dwellings will vary according to the level of local need, nature of sites identified and the size of the existing settlement.
- 15.3 Exception sites should form a logical extension to the existing village and should not be viewed as scattered development in the open countryside. Settlements should ideally be supported by local services and a public transport service.
- 15.4 In accordance with the NPPF part 1d) allows a small proportion of market homes to be provided where there is a clear site specific evidence that this is needed. Developments should not however provide more market housing than is absolutely needed.

16. Is the Gypsy, Travellers and Travelling Showpeople Accommodation Assessment (GT1) soundly based and are its conclusions justified?

- 16.1 The jointly commissioned assessment⁹², undertaken by ORS⁹³, covers the same geographical area as the housing market area and is considered to be an appropriate scale for a strategic assessment. The methodology in chapter three of GT1 takes account of new policy/guidance and legislation such as the changes to the PPTS in 2015.
- 16.2 The approach involved a combination of desk-based research, stakeholder interviews⁹⁴ and engagement with members of the travelling community living on all known sites/yards⁹⁵. The deployment

⁹² GT1 Gypsy, Traveller and Travelling Showpeople Accommodation Assessment – commissioned by the 4 Buckinghamshire districts

⁹³ ORS have undertaken 120 assessments since the PPTS came out in 2015 and have successfully defended them at examinations- e.g. Cheltenham and Tewkesbury, (2016-17) and Maldon (2017).

⁹⁴ 128 interviews were carried out across the study area including 37 in Wycombe District

⁹⁵ See paragraphs 3.6 – 3.18 in GT1 Gypsy, Traveller and Travelling Showpeople Accommodation Assessment

of these mixed methods have taken every reasonable step to identify current and future needs for gypsy, traveller, and travelling showpeople accommodation.

- 16.3 The GTAA also includes an estimate of current and future accommodation need for those who were not able to be interviewed who may meet the planning definition (unknown households).
- 16.4 While not a requirement, the GTAA also includes an assessment of the need of households who do not meet the definition for completeness.
- 16.5 The outcomes of the interviews were used to assess whether household members met the planning definition set out in PPTS (2015) Annex 1, in that they stated that household members:
- Travel for work purposes and stay away from their usual place of residence when doing so; or
 - Have ceased to travel temporarily due to education, ill health or old age.
- 16.6 The conclusions of the report set out the current and future accommodation need for each of the Buckinghamshire districts, taking account of various elements of need outlined in GT1. For Wycombe, the key component of need arises from new housing formation.⁹⁶
- 16.7 The rationale for the new household formation figures is set out in “Technical Note: Gypsy and Traveller Household Formation and Growth Rates” (2015)⁹⁷. While household formation rates can be dependent on local demographics, the national rate of new household formation for Gypsies and travellers is 1.50%. This has been adjusted accordingly, based on the local demographics found in the districts of Buckinghamshire. The technical note has been accepted as a robust

⁹⁶ This is addressed in paragraphs 7.5-7.13 and appendix F of GT1 Gypsy, Traveller and Travelling Showpeople Accommodation Assessment

⁹⁷ Appendix F in GT1 Gypsy, Traveller and Travelling Showpeople Accommodation Assessment

academic evidence base by the Social Research Association, and has been accepted as a justified position in a number of planning appeals⁹⁸.

16.8 GT1 concludes there is a need for no additional pitches for those travellers that meet the planning definition set out in Annex 1 of PPTS (2015) and up to seven additional pitches for unknown households. For travelling showpeople, the need is one additional plot for those who meet the definition and up to two additional plots for unknown showpeople.

16.9 Paragraph 9 of PPTS (2015) requires the Council to set a requirement for new pitches / plots for those meeting the definition set out in Annex A. As noted in paragraph 16.8 above, a substantial component of the need is for unknown households. GTAA paragraphs 7.53 – 7.57 set out the proportion of these plots that ORS expects may meet the planning definition, based on their experience conducting such assessments across England, with their suggestion being that our requirement should be one additional pitch for travellers and one additional plot for travelling showpeople⁹⁹.

16.10 The maximum requirement to meet our need is for seven additional pitches and three additional plots, and ORS recommendation is that the requirement be set at one additional pitch and two additional plots.

16.11 Paragraph 7.21 of TP10 sets out how we have taken a cautious approach by setting the requirement at a level that addresses all unknown need. It is our expectation that by overestimating the requirement, we will meet our obligation under paragraph 9 of PPTS (2015), and that this overestimation will also provide a buffer to the requirement.

⁹⁸ For example Doncaster (November 2016 - Ref: APP/F4410/W/15/3133490) and Guildford (March 2018 - Ref: APP/W/16/3165526).

⁹⁹ In addition to one additional travelling showpeople plot for those meeting the definition, i.e. a need for two additional plots.

16a) How and where will the requirement for 7 pitches for Travellers and 3 plots for Travelling Showpeople be met?

16.12 Topic paper 10: “Meeting the needs of travellers” (TP10) outlines how we will meet the requirement set out in the ORS assessment (GT1). Sections 7 and 8 of TP10 are of particular relevance.

16.13 The GTAA base date was February 2016. As set out in paragraphs 7.6 – 7.9 of TP10, since the February 2016 base date, a total of six additional pitches for travellers have been granted planning permission¹⁰⁰, and applying this to the need requirement produces the modified need of two additional pitches for travellers in the latter part of the plan period, and three plots for travelling showpeople, as outlined at paragraph 7.20 of TP10.

16.14 We intend to meet the need for the remaining two traveller pitches, and the three plots for travelling showpeople, through the expansion and intensification of existing sites where the need arises¹⁰¹. As outlined in paragraph 8.1 of TP10, we have decided not to allocate sites to meet this need due to our approach already overestimating the need, and a number of pitches already being delivered since the base date of the assessment. The intention is to assess any further proposals to address need that does arise using the criteria based approach set out in policy DM26.

17. Does Policy DM26 (Criteria for Traveller sites) provide a clear and consistent framework for assessing proposals for additional Gypsy and Travellers sites?

17.1 Policy DM26 was produced in response to the requirement set out in paragraph 11 of PPTS (2015) to provide a criteria-based policy to assess proposals for additional traveller sites that may come forward above and beyond the assessed need identified in the GTAA (2017). It

¹⁰⁰ The six additional pitches comprise one grant of permanent permission for a household on a site with temporary permission, four permissions for new household formations, and one permission for the intensification of a site to address a concealed household. The latter was an element of need that had arisen since the assessment, and therefore was not subtracted from the requirement.

¹⁰¹ In respect of the travelling showpeople plots, table 3 of TP10 Topic Paper 10 Meeting the needs of travellers identifies sites which may be intensified to meet the requirement.

will also be used to assess applications by those travellers who no longer meet the planning definition (have ceased to travel) but wish to claim culturally appropriate accommodation in line with the Equalities Act 2010, and therefore provides a single consistent framework for assessing all applications for additional traveller sites.

17.2 This policy consists of three sections:

- Part 1 sets out the broad areas where development will be permitted, defined as areas outside of the Green Belt in line with Policy E of PPTS (2015), and excluding an area around the settlement of Marsh. This exclusion is in line with Policy C of PPTS (2015), which states that the scale of traveller sites should not dominate the nearest settled community. Marsh is a hamlet with a dispersed linear character, with a low density and various traveller sites located around it with a particular group to the north-west. Taken cumulatively, it is felt that any further sites in addition to the permitted traveller sites in the area will dominate the hamlet¹⁰².
- Part 2 sets out six criteria which provide a clear framework for assessing schemes that come forward in the broad areas identified in part 1 of the policy. These are considered to be reasonable criteria, which have been derived from local concern, feedback from statutory consultees, and criteria presented in paragraph 13 in PPTS (2015) and the NPPF.
- Part 3 sets out a presumption in favour of protecting existing traveller sites unless a reasonable alternative site is provided, in line with paragraph 21 of PPTS (2015).

17.3 Part 1 of the policy sets out a clear definition of where proposals for additional gypsy and traveller sites can go, while part 2 provides a

¹⁰² A full explanation of the rationale is set out in paragraphs 6.20 to 6.26 of TP10 Meeting the needs of travellers

framework to determine if proposals are appropriate, subject also to all other relevant policies within the Local Plan.

- 17.4 On this basis, we consider that policy DM26 presents a consistent approach for assessing proposals for additional gypsy and traveller sites, regardless of the applicant's status in terms of the PPTS (2015) definition.

Appendix 1:

1. 5 year supply calculations against 2016 base date¹⁰³

Table 1: 2018-23

<u>5 year land supply position – 2018-23 (i.e. 5 years from adoption of the plan)</u>	
Supply 2013-18	2,381
Requirement 2013-18 = 2,731	2,731
Shortfall / over supply	- 350
5 year requirement 2018-23 = 2,731 + 350 = 3,082	3,082
With 5% buffer	3,236
Supply = 4,387	4,387
<i>Conclusion = we have 6.8 years supply in this period.</i>	6.8

Table 2: 2023-28

<u>5 year land supply position – 2023-28</u>	
Requirement 2013-33	10,925
Supply 2013-23	6,768
Adjusted annual requirement - (10,925 minus 6,768 divided by remaining years)	416
5 year requirement 2023-28 = annual requirement x 5	2,079
With 5% buffer	2,182
Supply in 2023-28	2,658
<i>Conclusion = we have 6.1 years supply against 5% buffer</i>	6.1

¹⁰³ As published in tables 19 and 20 of HELS1 Housing and Economic Land Availability Assessment (HELAA) - Publication Version

Table 3: 2028-33

<u>5 year land supply position – 2028-33</u>	
Requirement 2013-33	10,925
Supply 2013-28	9,426
Adjusted annual requirement - (10,925 minus 9,534 divided by remaining years)	300
5 year requirement 2028-33 = annual requirement x 5	1,499
With 5% buffer	1,574
Supply in 2028-33	1,501
<i>Conclusion = we have 4.8 years supply against 5% buffer</i>	4.8

2. 5 year supply calculations against 2017 base date¹⁰⁴

Table 4: Rolling 5 year position against 2017 base

<u>5 year land supply position – 2018-23</u>	
Requirement 2013-18	2,731
Supply 2013-18	2,347
Shortfall against annual requirement for period 2013-18	- 384
5 year requirement 2018-23 annual requirement x 5 + shortfall	3,116
With 5% buffer	3,271
Supply in 2018-23	4,511
<i>Conclusion = we have 6.9 years supply against 5% buffer</i>	6.9

¹⁰⁴ As published in HELS7 Wycombe Monitoring Report Monitoring Period 1 April 2015 to 31 March 2017 and HELS7.1 Wycombe Monitoring Report Monitoring Period 1 April 2015 to 31 March 2017 Technical Appendices

WDC Statement Matter 3: Housing Provision,
Supply, Affordability and Gypsy and Traveller accommodation

<u>5 year land supply position – 2019-24</u>	
Requirement 2013-19	3,278
Supply 2013-19	3,209
Shortfall against annual requirement for period 2013-18	- 69
5 year requirement 2019-24 annual requirement x 5 + shortfall	2,800
With 5% buffer	2,940
Supply in 2019-24	4,373
<i>Conclusion = we have 7.4 years supply against 5% buffer</i>	7.4
<u>5 year land supply position – 2020-25</u>	
Requirement 2013-20	3,824
Supply 2013-20	4,140
Difference in supply against annual requirement for period 2013-20	316
5 year requirement 2020-25 annual requirement x 5 + shortfall (none)	2,610
With 5% buffer	2,740
Supply in 2020-25	4,127
<i>Conclusion = we have 7.5 years supply against 5% buffer</i>	7.5
<u>5 year land supply position – 2021-26</u>	
Requirement 2013-21	4,370
Supply 2013-21	5,254
Difference in supply against annual requirement for period 2013-21	884
5 year requirement 2021-26 annual requirement x 5 + shortfall (none)	2,363
With 5% buffer	2,481
Supply in 2021-26	3,488
<i>Conclusion = we have 7.0 years supply against 5% buffer</i>	7.0

<u>5 year land supply position – 2022-27</u>	
Requirement 2013-22	4,916
Supply 2013-22	6,109
Difference in supply against annual requirement for period 2013-22	1,193
5 year requirement 2022-27 annual requirement x 5 + shortfall	2,189
With 5% buffer	2,299
Supply in 2022-27	3,053
<i>Conclusion = we have 6.6 years supply against 5% buffer</i>	6.6
<u>5 year land supply position – 2023-28</u>	
Requirement 2013-33	10,925
Supply 2013-23	6,858
Adjusted annual requirement - (10,925 minus 6,858 divided by remaining years)	406.7
5 year requirement 2023-28 = annual requirement x 5	2,034
With 5% buffer	2,135
Supply in 2023-28	2,676
<i>Conclusion = we have 6.3 years supply against 5% buffer</i>	6.3
<u>5 year land supply position – 2024-29</u>	
Requirement 2013-24	6,009
Supply 2013-24	7,582
Difference in supply against annual requirement for period 2013-24	1,573
5 year requirement 2022-27 annual requirement x 5 + shortfall	1,520
With 5% buffer	1,596
Supply in 2024-29	2,329
<i>Conclusion = we have 7.3 years supply against 5% buffer</i>	7.3

<u>5 year land supply position – 2025-30</u>	
Requirement 2013-25	6,555
Supply 2013-25	8,267
Difference in supply against annual requirement for period 2013-25	1,712
5 year requirement 2022-27 annual requirement x 5 + shortfall	1,208
With 5% buffer	1,269
Supply in 2025-30	1,967
<i>Conclusion = we have 7.8 years supply against 5% buffer</i>	7.8
<u>5 year land supply position – 2026-31</u>	
Requirement 2013-26	7,101
Supply 2013-26	8,742
Shortfall against annual requirement for period 2013-26	1,641
5 year requirement 2022-27 annual requirement x 5 + shortfall	992
With 5% buffer	1,042
Supply in 2026-31	1,772
<i>Conclusion = we have 8.5 years supply against 5% buffer</i>	8.5
<u>5 year land supply position – 2027-32</u>	
Requirement 2013-27	7,648
Supply 2013-27	9,162
Shortfall against annual requirement for period 2013-27	1,515
5 year requirement 2022-27 annual requirement x 5 + shortfall	801
With 5% buffer	841
Supply in 2027-32	1,610
<i>Conclusion = we have 9.6 years supply against 5% buffer</i>	9.6

5 year land supply position – 2028-33	
Requirement 2013-33	10,925
Supply 2013-28	9,534
Adjusted annual requirement - (10,925 minus 9,534 divided by remaining years)	278.2
5 year requirement 2028-33 = annual requirement x 5	1,391
With 5% buffer	1,461
Supply in 2028-33	1,496
<i>Conclusion = we have 5.1 years supply against 5% buffer</i>	5.1