



Wycombe District Local Plan (Regulation 19) Publication version

Topic Paper 2: Housing

October 2017

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1.0 Introduction

1.1 This topic paper is one in a series. The subject of this topic paper is how we have developed the key housing strategy within the Wycombe District Local Plan (Regulation 19) Publication Version (October 2017). Each topic paper will look at the relevant national and local guidance that informs the Publication Draft Local Plan. Topic papers explain how the strategy has developed and the information, evidence and feedback that has informed the choices made in formulating the policies and also sets out what we foresee as the key issues and how these have been resolved. The housing supply is underpinned by a base date of 1st April 2016. This topic paper will be updated with monitoring information as of 1st April 2017 before the Plan is submitted for examination.

2.0 National Planning Policy

- 2.1 National Policy sets out the requirements for plan making in terms of establishing housing need and supply. Our policies must be positively prepared, justified, effective and consistent with national policy. The National Planning Policy Framework (NPPF) sets out the overarching planning policy framework, supported by Planning Practice Guidance (PPG).
- 2.2 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking (paragraph 14). Local planning authorities should positively seek opportunities to meet the development needs of their area. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF when taken as a whole. Footnote 9 to paragraph 14 identifies those policies which indicate where development should be restricted. Wycombe District is relevant to footnote 9 with over 75% of the District either Green Belt or AONB.

- 2.3 Paragraph 47 of the NPPF identifies local planning authorities should significantly boost the supply of housing. To do this local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.
- 2.4 Paragraph 159 of the Framework identifies local planning authorities should have a clear understanding of housing needs in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.
- 2.5 The Department of Communities and Local Government published the White Paper 'Fixing our broken housing market' in 6th February 2017. This sets out how the Government intends to boost housing supply and create a more efficient housing market which meets the needs and aspirations of households and which supports economic prosperity. There are four strands to the Government's proposals:
- 2.6 Planning for the right homes in the right places - Green Belt is protected and greater emphasis is placed on quality, character and higher densities; maximise contribution from brownfield and surplus public land and regenerating estates.
- Building homes faster by changing the way land supply for housing is assessed - linking infrastructure provision with housing development, tackling skills shortages, proposals for a common methodology on how to determine the objectively assessed need, and holding developers and local planning authorities to account for the delivery of new homes;
 - Diversifying the housing market by focussing on increasing the numbers of small and medium-size builders; and
 - Helping people now by better meeting housing needs.

- 2.7 At this stage it is only a consultation and not enshrined in Government policy. The revised NPPF is expected to be published in spring 2018. Other than in relation to the application of the Government's proposed methodology for calculating the housing objectively assessed need (see below), it is unclear what transitional arrangements will apply, although our understanding from CLG is that there will be some. WDC can only respond when the final version is available.
- 2.8 Since then the Government has produced a consultation paper, September 14th 2017 "Planning the right homes in the right places" which includes within it a new methodology for calculating the housing objectively assessed need (OAN). The proposals include transition arrangements whereby any authority which submits its local plan by 31st March 2018 (or by when the new NPPF is published, whichever is the later), the plan should continue to be examined and rely on evidence prepared using the current method of calculating the housing OAN.
- 2.9 WDC intends to submit its Local Plan prior to the 31st March 2018 and therefore as set out in the consultation paper on assessing housing OAN, it is exempted under the transitional arrangements from the new OAN Methodology.

3.0 Housing Market Area

National Policy Context

- 3.1 The NPPF requirements for Housing Market Areas and Objectively Assessed Housing need are set out in paragraphs 47 and 159 of the NPPF. LPAs should have a clear understanding of housing needs in their area. They should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where they share a housing market area.
- 3.2 The PPG provides further detail on how to define the housing market area (and functional economic market area). A housing market area is a geographical area defined by household demand and preferences for all

types of housing, reflecting the key functional linkages between places where people live and work. It might be the case that housing market areas overlap. The extent of the housing market areas identified will vary, and many will in practice cut across various local planning authority administrative boundaries. Local planning authorities should work with all the other constituent authorities under the duty to cooperate¹.

3.3 Housing needs should be assessed in relation to the relevant functional area, i.e. housing market area, (functional economic market area in relation to economic uses), or area of trade draw in relation to main town centre uses. Establishing the assessment area may identify smaller sub-markets with specific features, and it may be appropriate to investigate these specifically in order to create a detailed picture of local need. It is important also to recognise that there are 'market segments' i.e. not all housing types (or economic development) have the same appeal to different occupants. In some cases housing market areas and functional economic areas may well be the same².

3.4 Housing market areas can be broadly defined by using 3 different sources of information³:

- House prices and rates of change in house prices
- Household migration and search patterns
- Contextual data (e.g. travel to work area boundaries, retail and school catchment areas)

¹ PPG paragraph: 010 Reference ID: 2a-010-20140306

² PPG Paragraph: 008 Reference ID: 2a-008-20140306

³ PPG Paragraph: 011 Reference ID: 2a-011-20140306

Buckinghamshire Housing Market Area

- 3.5 In 2013 as part of the early work on the new Local Plan Wycombe District Council commissioned ORS to undertake a SHMA.⁴ At that time other Bucks authorities did not want to undertake a wider study due to their respective plan making activities at the time, including Aylesbury Vale District Council's examination on their Vale of Aylesbury Plan (VAP). A draft of this SHMA was published in February 2014 to accompany the Wycombe Local Plan options consultation.
- 3.6 It became apparent, particularly in the light of the failure of the Vale of Aylesbury Plan at examination, that a closer look was required at the definition of what constitutes the housing market area. The Buckinghamshire districts therefore commissioned consultants, ORS, to determine the Housing Market Area(s) (HMA) that the Buckinghamshire authorities fall within, using the recently published guidance in the National Planning Policy Guidance.
- 3.7 The definition of a functional housing market area is well-established as being "...the geographical area in which a substantial majority of the employed population both live and work and where those moving house without changing employment choose to stay". Consistent with previous CLG advice, the PPG suggests that house prices, migration patterns and commuting flows should all be considered when defining housing markets; and by using a range of available data, judgements on appropriate geography can be made. ORS followed this process to understand the housing markets in and around Buckinghamshire.
- 3.8 This commission involved liaison with a wide range of authorities (not just adjoining authorities). The outcome of that work is set out in the HMA report (March 2015)⁵. It concluded that the functional HMA did not neatly follow district boundaries but that on a best fit basis by local authority area, the districts of Aylesbury Vale, Chiltern and Wycombe formed the HMA. A

⁴ Draft Strategic Housing Market Area (January 2014)

⁵ Housing Market Areas and Functional Economic Market Areas in Buckinghamshire, ORS and Atkins report (March 2015)

subsequent decision in November 2015 by Chiltern and South Bucks District Councils to produce a joint Local Plan led to a revision to the best fit HMA to include South Bucks district on the basis of a best fit by plan area.

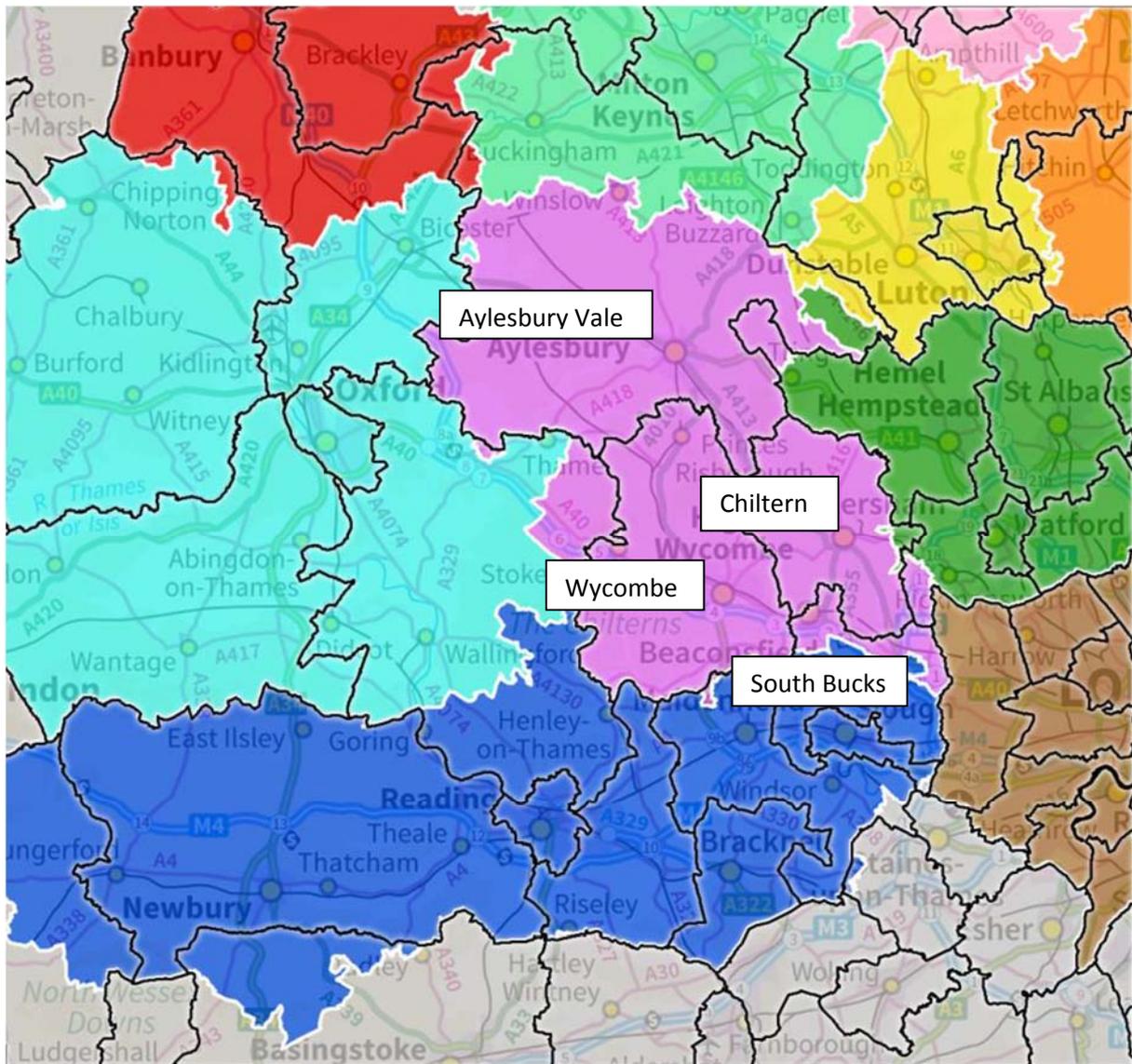
- 3.9 An update to the HMA report was undertaken in 2016 in the light of more detailed migration data⁶. This slightly changed the functional HMA boundary but not the best fit HMA. As Figure 1 shows, Wycombe District falls 100% within the functional HMA so there is no issue of best fit with Wycombe District.
- 3.10 The Duty to Cooperate report⁷ explains the engagement undertaken and the outcomes achieved on this work. Whilst there is an issue with the Berkshire authorities regarding whether South Bucks should, on a best fit basis, be part of the Bucks HMA or a Berkshire/East Berkshire HMA (depending on whether you apply a best fit approach to local authority areas or plan making areas), there was no dispute that Wycombe forms part of the Bucks HMA, being 100% within the functional HMA identified in the study. Memorandums of Understanding (MoU) with the other Bucks authorities and the Bucks Thames Valley LEP agreed the best fit HMA. Other MoUs with key adjoining authorities, namely Royal Borough of Windsor and Maidenhead and South Oxfordshire also agree that Wycombe and the respective authority are in separate Housing Market Areas⁸:

⁶ Bucks Housing Market and Functional Economic Areas Update (June 2016)

⁷ Wycombe District Local Plan and the Duty to Cooperate Draft Report, Wycombe District Council (September 2017)

⁸ Housing Market Area and Functional Economic Market Area (March 2015)
HMAs and FEMAs in Buckinghamshire The Impact of a Joint Plan for Chiltern and South Bucks (January 2016)

Figure 1 Bucks Housing Market Area (2016 update)



Note: Bucks Functional Housing Market Area – purple.

4.0 Objectively Assessed Housing Need

Policy Context

- 4.1 To boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area as far as consistent with policies set out in the Framework (NPPF, paragraph 47).
- 4.2 Paragraph 159 of the Framework identifies local planning authorities should have a clear understanding of housing needs in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:
- meets household and population projections, taking account of migration and demographic change;
 - addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
 - caters for housing demand and the scale of housing supply necessary to meet this demand.
- 4.3 The PPG in the 'Housing and Economic Development Needs Assessment' section sets out how the OAN should be assessed. It identified household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need. Household projections are trend based. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. The

household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply⁹.

- 4.4 The PPG also sets out how planners should respond to market signals. It advises looking at trends in comparative indicators in the HMA. A worsening trend will require an upward adjustment to planned housing numbers¹⁰.

Strategic Housing Market Assessment (SHMA) / Housing and Economic Development Needs Assessment (HEDNA)

- 4.5 The early SHMA work in 2013/ early 2014 referred to above was undertaken prior to the PPG guidance being finalised, including the introduction of the market signals step. Nevertheless, that early work signalled to the Council that the OAN was likely to be significantly higher than the housing target in the current Core Strategy (402.5 per annum) and hence that a wider range of options would need to be considered for addressing that need.
- 4.6 Following the completion of the Buckinghamshire HMA work the Buckinghamshire Districts commissioned ORS and Atkins to undertake a Housing and Economic Development Needs Assessment, incorporating not just the assessment of the housing OAN but also the need for employment land/floorspace and associated jobs forecasts. The Bucks Thames Valley LEP and Buckinghamshire County Council also sat on the steering group.
- 4.7 A draft of the HEDNA was published for consultation in autumn 2015. This indicated an OAN for Wycombe District (2013-33) of **15,100** homes and for the HMA as a whole of around 50,000 homes over the same period. This

⁹ PPG Paragraph: 003 Reference ID: 2a-003-20140306 06.03.2014

¹⁰ PPG Paragraph: 019 Reference ID: 2a-019-2014030 06.03.20146

15,100 figure underpinned the Council's draft Local Plan consultation in June –August 2016 (as part of regulation 18 plan preparation).

- 4.8 The release by ONS and CLG of new household and population projections and estimates in mid-2016 prompted an update to the HEDNA. This also provided an opportunity to take on board comments received on the draft HEDNA earlier in the year. This resulted in revised Housing OAN figures, **12,900** for Wycombe District and 45,600 for the HMA as a whole. This Buckinghamshire HEDNA Update was published in December 2016¹¹.
- 4.9 The HEDNA Update (December 2016) erroneously excluded the impact of the adjustment for suppressed household formation rates from the OAN. As a consequence, a HEDNA Addendum¹² (September 2017) was produced, which corrected the housing OAN figure for Wycombe District and as a result it increased the housing OAN by 300 dwellings to **13,200** for the District and by 600 dwellings to 46,200 for the HMA.

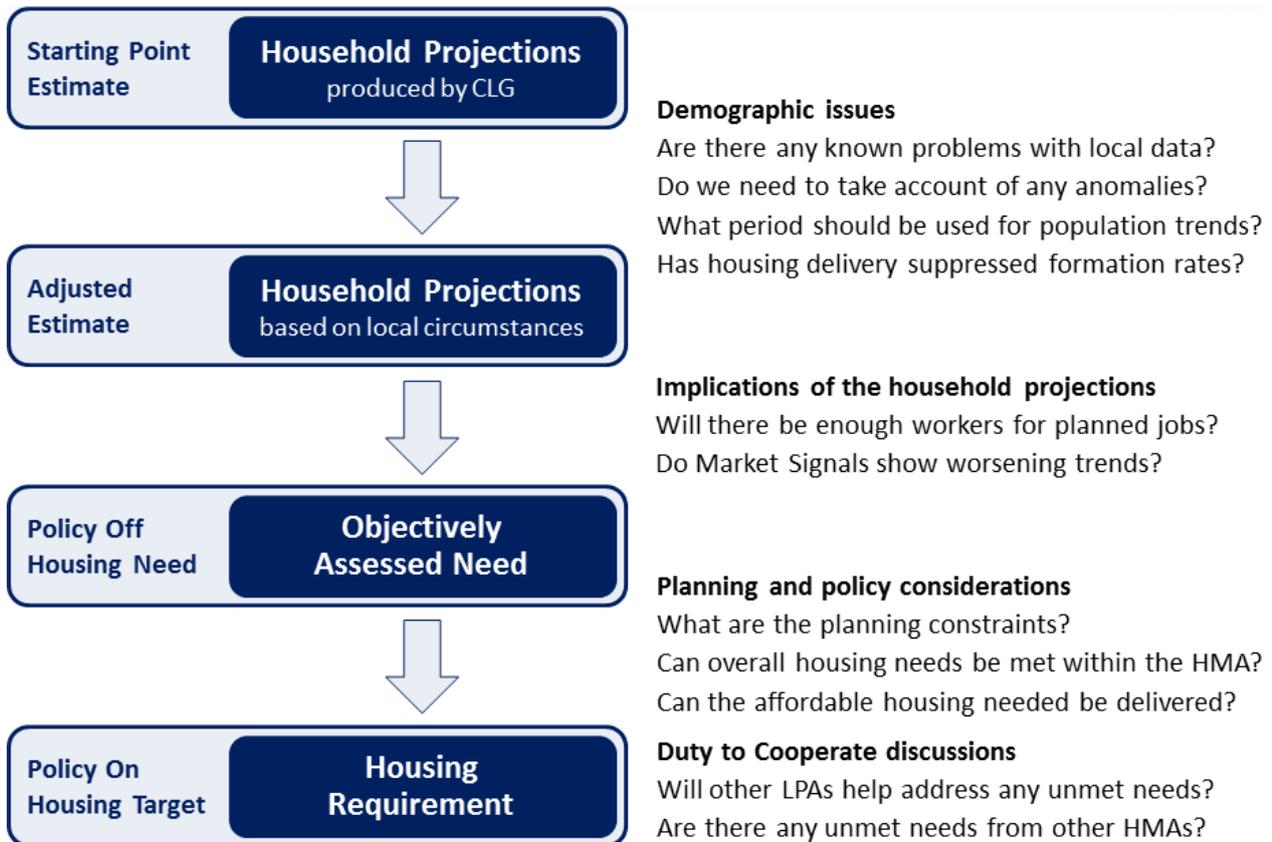
How was the Objectively Assessed Need for Buckinghamshire calculated?

- 4.10 The calculation of the housing OAN for the Buckinghamshire HMA involved going through a series of steps, based on the advice set out in the National Planning Policy Framework (NPPF) and the Planning Policy Guidance (PPG). These are summarised in the diagram below taken from the HEDNA Update figure 1:

¹¹ Housing and Economic Development Needs Assessment Update (December 2016)

¹² Housing and Economic Development Needs Assessment Addendum (September 2017)

Figure 2 Process for establishing a Housing Number for the HMA (Source: ORS based on NPPF and PPG)



Key features of the OAN calculation in the HEDNA are as follows:

- 4.11 **Migration trends** are based on the latest 10 year trends not 5 years. This responds to local circumstances across Buckinghamshire within particular, high rates of development in Aylesbury leading to higher levels of short-term migration. 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.
- 4.12 **Unattributable population change (UPC)** is factored into the projections – the early work on the Wycombe SHMA had highlighted this as an issue most likely linked to the historic undercounting of international migration. When factored in this increases the population projections for Wycombe, albeit at a reduced level now that ONS have improved the way international migration is counted. The process for adjusting for UPC was to take the mid-year population estimates for 2005 and 2015 and remove births and

deaths during this period. Any other changes in population are driven by migration which is then used in the population projections.

- 4.13 UPC has also historically been, and continues to be, a significant issue in Aylesbury Vale District. Despite the ONS improvements to data collection, administrative data sources show that systematic problems continue to affect more recent data in Aylesbury Vale District. The population for Aylesbury Vale was adjusted downwards in the HEDNA due to clear indications that the current mid-year population estimates are an over-estimation for the area. Therefore, while there is an adjustment for UPC in the HEDNA, there are also adjustments for problems with the 2001 Census and also issues with the current mid-year population estimates.
- 4.14 No direct adjustment is made to 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. However, the HEDNA does make an adjustment for concealed families and homeless households.
- 4.15 In Wycombe, a 20% uplift for **market signals** is included in the OAN. This is the same as in adjoining Chiltern and South Bucks even though the market signals in those two districts are stronger. The uplift in Aylesbury Vale is 10%. The 20% uplift for market signals is a greater uplift than is required to balance homes and jobs. As such, no further uplift is required to balance homes and jobs.
- 4.16 '**Shortfalls**' 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 Guide¹³ that Strategic Housing Market Assessments (the housing element of the HEDNA) should 're-set the clock' and provide a new baseline assessment of all housing need, therefore no shortfall is included.

¹³ PAS, Objectively Assessed Need and Housing Targets Technical advice note: Second Edition, July 2015

- 4.17 The '**backlog**' of affordable housing need is in effect the unmet affordable housing need, as at 2013, the start of the plan period i.e. the unmet needs of homeless and other households living in unacceptable accommodation. This 'backlog' of need is included within the affordable housing HEDNA calculations, in accordance with the advice set out in Para. 2214 of the PPG on the Housing and Economic Development Needs Assessment.
- 4.18 The balance between the future need for market and affordable housing is based on a relatively stringent, but PPG consistent, assessment of affordability. The model for affordable housing needs combines data from those households who have been allocated affordable housing and also from households who have received housing benefit in the private rented sector. Therefore, it includes data on trends for all households who have either moved to social housing or who the government have assessed require support with their housing costs to assess likely patterns of affordable housing now and in the future. The affordable housing need identified in the HEDNA can therefore be considered as a minimum based upon current letting and welfare policies.
- 4.19 **Housing OAN uplift for Affordable Housing** -The PPG requires in paragraph 02915 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. The Plan does not propose such an increase.
- 4.20 **Ageing population** – The HEDNA based its housing needs for older people on the standardised rates in the report, Strategic Housing for Older People Resource Pack by Housing LIN in 2012.

¹⁴ Reference ID: 2a-022-20140306 06.03.2014

¹⁵ Reference ID: 2a-029-20140306 06.03.2014

Key Issues on identifying the Objectively Assessed Need

- 4.21 Consultation has taken place throughout the HEDNA production process (see the Wycombe District Local Plan and the Duty to Cooperate Draft Report¹⁶, September 2017 for more detail – in particular the Strategic Planning Issues Statement on Objectively Assessed Housing Need). In addition, there have been a number of Section 78 appeals in Buckinghamshire, particularly in Aylesbury Vale and also Local Plan examinations where the approach to the OAN has been tested. These include planning appeals at Land west Of Castlemilk, Moreton Road, Buckingham¹⁷ and Land adjacent to 80 Long Chilton Road, Long Crendon, Buckinghamshire¹⁸ where the OAN was examined in detail. In both 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.
- 4.22 It is clear from this that there are likely to be a number of key issues around the approach that has been taken to establishing the housing OAN for the Buckinghamshire HMA and for Wycombe District and these issues and our response to them are considered in more detail below:

New OAN Methodology Consultation Paper

- 4.23 Since the Buckinghamshire HEDNA Update and HEDNA Addendum were published (December 2016 and September 2017 respectively) the Government has produced a consultation paper, September 14th 2017 "Planning the right homes in the right places" which includes within it a new methodology for calculating OAN. This methodology produces significantly different figures for each of the local authorities in Buckinghamshire to those contained in the HEDNA.

¹⁶ Duty to Co-operate Report (September 2017)

¹⁷ Castlemilk: Application ref: 14/02601/AOP Appeal ref: APP/J0405/V/16/3151297

¹⁸ Long Crendon: Application ref: 15/02670/AOP, Appeal ref: APP/J0405/W/16/3142524

Table 1 Government OAN Consultation Paper Figures

Authority/Area	Current OAN ¹⁹	New OAN	Difference	Percentage change
AVDC	965	1,499	+534	+55.4%
WDC	641	792	+151	+23.6%
CDC/SBDC	678	748	+70	+10.3%
Bucks	2,284	3,039	+755	+33.1%

4.24 The proposals include transition arrangements whereby any authority which submits its local plan by 31st March 2018 or by when the new NPPF is published, (whichever is the later) should use the old method of calculating the housing OAN in progressing their local plan at examination. The consultation report indicates the new NPPF will be published in Spring 2018.

4.25 It is considered that, as WDC intends to submit its Local Plan prior to the 31st March 2018 it is exempted under the transitional arrangements from the new OAN Methodology, as set out in the consultation paper on assessing housing OAN, and should proceed to examination on the basis of the housing OAN set out in the HEDNA Addendum.

Migration trends based on 10 year trend as opposed to the 5 year trend approach included in the household projections.

4.26 The justification for adopting this approach is set out above and also covered in the HEDNA Update (December 2016) (page 65 onwards). In summary the reason is:

- 5-year trend migration scenarios are less reliable: they have the potential to roll-forward short-term trends that are unduly high or low and therefore are unlikely to provide a robust basis for long-term planning.
- 10-year trend migration scenarios are more likely to capture both highs and lows and are not as dependent on trends that may be

¹⁹ These figures published by CLG are based on the December 2016 HEDNA as the HEDNA Addendum (September 2017) update to the OAN figures was not published at the time the data was collected by CLG.

unlikely to be repeated. Therefore, we favour using 10-year migration trends as the basis for our analysis.

- 4.27 The HEDNA Update therefore favours 10-year migration trends as the basis for establishing housing need, rather than the 5-year trends used for the CLG projections. Adopting long-term migration trends also avoids the suppressing of migration from London. This approach was discussed with officers from the GLA at a meeting in January 2015 and was agreed to be appropriate.
- 4.28 Using a longer term migration trend is cited as being the most reliable one in the Planning Advisory Services Technical Note: Version 2 (July 2015) on Objectively Assessed Need and Housing Targets; an article by Ludi Simpson (Professor of Population Studies at the University of Manchester) and Neil McDonald (previously Chief Executive of the National Housing and Planning Advice Unit) on the relevant period for assessing migration trends (April 2015)²⁰. It stated that “shorter periods are more susceptible to cyclical trends” and also that the issue has been referenced by Inspectors examining numerous Local Plans, including the Cornwall Inspector²¹ and the Bath and North East Somerset (BANES) Report²². Also in the Castlemilk and Long Crendon s78 appeals referred to above the Inspectors support this longer trend period, as well as the GLA approach.
- 4.29 From a Wycombe perspective the 5 year trend approach i.e. using the 2014 SNPP figures results in a projected population figure of 194,134, as opposed to 192,924 using the alternative 10 year trend 2005-15 i.e. a difference of 1,210 (see Figure 49 in the December 2016 HEDNA Update).

Adjusting for unattributable population change (UPC)

- 4.30 The PPG states that household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and

²⁰ Making sense of the new English household projections, Town and Country Planning (April 2015)

²¹ Report on the Examination into the Cornwall Local Plan Strategic Policies’ (23 September 2016) ref: PINS/D0840/429/12

²² Report on the Examination into Bath and North East Somerset Council’s Core Strategy’ (24 June 2014) ref: PINS/F0114/429/4

household formation rates which are not captured in past trends²³. The HEDNA factors in a population adjustment for Aylesbury Vale, which equates to a reduction of about 550-600 persons each year and a UPC adjustment for Wycombe District, it equates to an increase in the population of around 500-550 persons each year.

4.31 The HEDNA refers to the fact that ONS publish quality assurance packs which provide a range of comparative data from various administrative sources for estimating population. Alternative population data for Aylesbury Vale is carefully considered in the HEDNA and in summary, over the 4-year period 2011-15:

- The mid-year estimates suggest a population increase of 13,850 persons, which is 4,170 higher than the 9,680 increase recorded on the NHS patient register – a difference of 1,043 persons on average each year;
- The mid-year estimates suggest an increase of 1,260 children aged 5-14, which is 520 higher than the 740 increase on the school census; and
- The mid-year estimates suggest an increase of 4,610 people aged 65 or over, which is 340 higher than the 4,270 increase in people aged 65+ receiving state pension.

4.32 Alternative administrative data for population is useful because the figures for the patient register and school places are based on real data returns each year while the MYE is based upon a combination of data returns and a model which also incorporates trend patterns. If trend patterns for an area have been wrong in the past then there is a high probability that they will continue to be wrong in the future. All of the administrative data sources that ONS identified for validating the population estimates suggest that the population is increasing slower than suggested by the estimates for the period mid-2011 to mid-2015, especially for those younger age groups that

²³ PPG Reference ID: 2a-015-20140306 06.03.2014

are particularly impacted by migration. On this basis, the HEDNA Update (January 2016) concluded that (para 3.41):

“the methodological improvement to estimating migration that the ONS introduced from 2004-05 onwards has created a systematic problem in Aylesbury Vale which has persisted beyond 2011, and it therefore isn’t appropriate to adopt this data uncritically”.

- 4.33 As set out above, the HEDNA does not make any adjustment for particular age groups being suppressed as these are picked up instead within the uplift for market signals. The key reason adopted for this approach is when responding to housing market signals, it is important to remember that the justification for any response must be predicated either on (i) a need to draw in additional population (above the levels observed through recent migration trends), normally as a consequence of needing to align jobs and workers; or (ii) a need to enable more households to form and allow average household sizes to reduce. On this basis, any response to housing market signals must be intrinsically related to the alignment (or lack of alignment) between jobs and workers, and the extent of any suppressed household formation that has been identified. To provide more dwellings in response to market signals and then to further provide more dwellings in response to suppressed household formation would be a clear double count of need because both uplifts would be serving the same function. Again this issue has been considered in detail at Local Plan Examinations such as for Cheshire East²⁴ and Luton²⁵ and also at the Long Crendon s78 appeals and ORS’s position has been accepted in all cases.

20% uplift for market signals for Wycombe, Chiltern and South Bucks and 10% uplift for Aylesbury Vale

- 4.34 The December 2016 HEDNA looked at comparative Council areas –South West Herts, West Kent, Eastleigh and West Surrey and sets out several

²⁴ Report on the Examination of the Cheshire East Local Plan Strategy Development Plan Document’ (20 June 2017) ref: PINS/R0660/429/3.

²⁵ Report on the Examination of the Luton Local Plan’ (1 August 2017) ref: PINS/B0230/429/1

aspects of the market signals as reasons for making its comparison. These market signals were:

- House Prices
- Rents
- Affordability (in terms of the ratio between lower quartile house prices and lower quartile earnings)
- Overcrowding (in terms of Census occupancy rates)
- Rate of development (in terms of increase in dwelling stock over the last 10 years).

4.35 The Eastleigh uplift of 10% was based on ‘modest pressure’ and the HEDNA concluded that there was more housing pressure in Buckinghamshire and consequently a higher uplift was needed.

4.36 The emphasis in the PPG is on affordability²⁶ when considering the response to market signals. In terms of affordability, the affordability ratio in Eastleigh is approximately 20% compared to 75% above the national rate in Bucks. Therefore the HEDNA suggests an uplift of 15% across the Bucks housing market area (see paragraph 7.84 of the HMA Report).

4.37 In term of the market signals and affordability ratios in particular there are differences between the Aylesbury Vale sub area and the rest of the HMA. Therefore the HEDNA suggests an uplift of 10% for Aylesbury Vale and 20% for the remainder (see paragraph 7.87 of the HMA Report).

4.38 At the time that the HEDNA was produced there was limited comparative percentages other than Eastleigh. However, at the Camden Local Plan²⁷ Examination a 20% uplift was accepted by the Inspector in October 2016, based on a recommendation by ORS in their SHMA. Meanwhile the Inspector for the Luton Local Plan has accepted a 10% uplift across the Central Bedfordshire and Luton HMA. On this basis, the market signals

²⁶ PPG paragraph 020 Reference ID: 2a-020-20140306 06.03.2014

²⁷ Report on the Examination of the Camden Local Plan’ (10 May 2017) ref: PINS/X5210/429/12

response set out in the HEDNA are in line with those adopted at recent Examinations in Public of other Local Plans.

- 4.39 At the Castlemilk Section 78 Appeal in Aylesbury Vale the appellants argued that the lower quartile affordability ratio shows that Aylesbury is less affordable than Eastleigh so a higher uplift would be reasonable. The Inspector accepted ORS's judgement on the uplift but this is likely to be scrutinised more closely at a Local Plan Examination than in a section 78 appeal.

Uplift for market signals is greater than the uplift needed to balance homes and jobs and therefore no further uplift is required to balance homes and jobs

- 4.40 Where additional housing is provided to balance future jobs and workers, it is reasonable to conclude that this will “increase planned supply by an amount that ... could be expected to improve affordability” (PPG ID 2a-020) in the same way as providing additional housing for any other reason. There is no reason to conclude that providing extra housing given a need for additional workers would not have an impact that is any different to providing extra housing given a need for more households to form; so this uplift should also be considered as a cumulative part of the response to market signals.

‘Shortfalls’ against previous development plan targets

- 4.41 Shortfalls in housing provision are briefly referred to in the key features of the OAN calculation in para. 4.16 above which concludes by saying that the Council considers that the new Plan and HEDNA should “re-set the clock”.
- 4.42 In Wycombe the Core Strategy set a housing target of 8,050 dwellings over the 2006-26 period (402.5 dwellings per annum). Table 2 overleaf sets out the housing completions in Wycombe District over the 2006-13 period – the period up to the base date of this new Local Plan.

Table 2: Dwelling completions in Wycombe District 2006/7 – 2012/13

Year	Net Dwelling Completions
2006-07	607
2007-08	611
2008-09	625
2009-10	304
2010-11	575
2011-12	514
2012-13	223
Total 2006-13	3,459 (494 p.a.)

4.43 It is clear from Table 2 above that in the period from 2006-07 (the start of the Core Strategy and also the South East Plan period) to 2012-13, the Council delivered above the Core Strategy target and so the issue of shortfalls in delivery is not an issue in Wycombe District. The base date for the housing OAN in the HEDNA is the start date for the Plan and the year that the South East Plan was revoked.

‘Backlog’

4.44 The OAN includes the unmet needs of homeless and other households in unacceptable accommodation that existed in 2013 and identified all needs arising over the 20-year period 2013-33, so there is no need to include any further ‘backlog’ of additional unmet need for housing at the start of new Plan period. The HEDNA calculates that there is an unmet need across the HMA from almost 1,800 households needing affordable housing at the start of the Plan periods.

4.45 As set out above, the HEDNA takes account of the current unmet affordable housing need (the backlog) and the projected future housing need and the supply of affordable housing stock in order to calculate the affordable housing need. This approach is in accordance with the advice set out in the PPG²⁸.

²⁸ PPG Paragraph 022 Reference ID: 2a-022-20140306 06.03.2014

5.0 Affordable Housing Need

5.1 The PPG identifies that affordable housing need is based on households *“who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market”* (paragraph 22) and identifies a number of different types of household which may be included²⁹:

- Homeless households or insecure tenure (e.g. housing that is too expensive compared to disposable income)
- Households where there is a mismatch between the housing needed and the actual dwelling (e.g. overcrowded households)
- Households containing people with social or physical impairment or other specific needs living in unsuitable dwellings (e.g. accessed via steps) which cannot be made suitable in-situ
- Households that lack basic facilities (e.g. a bathroom or kitchen) and those subject to major disrepair or that are unfit for habitation
- Households containing people with particular social needs (e.g. escaping harassment) which cannot be resolved except through a move

5.2 The PPG also suggests a number of data sources for assessing past trends and recording current estimates for establishing the need for affordable housing (paragraph 24):

- Local authorities will hold data on the number of homeless households, those in temporary accommodation and extent of overcrowding.
- The Census also provides data on concealed households and overcrowding which can be compared with trends contained in the English Housing Survey.

²⁹ PPG Paragraph: 023 Reference ID: 2a-023-20140306

- Housing registers and local authority and registered social landlord transfer lists will also provide relevant information.

5.3 The PPG provides details on how the affordable housing element should be calculated in the OAN including whether there should be an uplift to the OAN to ensure the delivery of the affordable housing need, as a 'policy on' consideration.

Justifying the HEDNA figure for Affordable Housing

5.4 The overall housing need includes the need for both market housing and affordable housing. Based on the OAN figures in the HEDNA Addendum (September 2017) 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%) and for smaller dwellings (50%). Currently affordable housing is provided by four main sources:

- through Registered Social Landlords and other providers making direct provision, outside of planning negotiations
- by negotiating a proportion of affordable housing on site specific housing or mixed use allocations (Policy DM 24)
- by negotiating a proportion of affordable housing on windfall sites (Policy DM 24)
- Rural exceptions affordable housing to meet local needs in accordance with Policy DM25

5.5 The HEDNA Update has accurately captured the unmet needs of homeless and other households living in unacceptable accommodation (such as concealed families and sharing households) for all needs arising over the 20-year period 2013-33; therefore, the needs of all households have been counted, 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. Therefore, meeting the affordable housing need in full would

offset the need to provide some market housing – so the need for affordable housing does not increase the overall objectively assessed need.

- 5.6 As a technical point, Figure 74 of the HEDNA Update includes data for households climbing out of need. This category isn't explicitly included in the PPG but its inclusion is essential in that the PPG is taking account of those falling into need during the Local Plan period, therefore it is relevant to include those climbing out of need.
- 5.7 It is also important to note that the HEDNA Update 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:³⁰

“care should be taken ... to only include those households who cannot afford to access suitable housing in the market”.

- 5.8 The HEDNA Update 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.
- 5.9 This approach has been considered at the Examination in Public of the Bath and North East Somerset, Luton, Cheshire East, Stevenage³¹, Camden and Redbridge³² Local Plans and a number of planning appeals including those at Castlemilk and Long Crendon. None of these have been found to be non-compliant with the PPG.
- 5.10 The housing supply has been assessed in order to estimate approximately how much affordable housing may come forward from. Sites of 10 or more

³⁰ PPG Paragraph: 024 Reference ID: 2a-024-20140306

³¹ Stevenage Borough Local Plan Proposed Main Modifications

³² Outer North East London Strategic Housing Market Assessment: Update for Redbridge: Report of Findings' (April 2017)

dwellings are identified as it is to these sites that affordable housing policy will apply.

- 5.11 Where planning permission is not already granted an assumption that tenure will be split 80:20 between rented accommodation and shared ownership has been identified. 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.

Table 3. Affordable Housing Supply

	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

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

- 5.13 Of the 3,065 above, around 335 could potentially be subject to vacant building credit which allows vacant floor space to effectively be taken off the amount of floor space assessed to determine the amount of affordable housing required to meet policy requirements. The Vacant Building test is an individual site and proposal assessment which looks at details of both existing and proposed schemes, how long they have been vacant for and

other details, therefore it is not possible to estimate what the discount may mean for the supply but it can be assumed it would only affect a relatively small proportion of sites.

- 5.14 The Buckinghamshire wide Memorandum of Understanding (MOU) will also address some of the unmet need for affordable housing as this will allow for an element to be provided in Aylesbury Vale District. This will contribute to meeting the need occurring in Wycombe as with the wider housing supply.

Why Wycombe District Council believe that there is not a case for uplifting the overall housing OAN to help with delivering affordable housing need.

- 5.15 Paragraph 47 of the NPPF is clear that local planning authorities should ‘use their evidence base to ensure that their Local Plan meets the full, objectively assessed need for market and affordable housing in the housing market area, as far is consistent with the policies set out in...’ the NPPF. In contrast paragraph 159 of the NPPF requires LPAs to prepare a Strategic Housing Market Assessment to assess their full housing needs which ‘meets household and population projections’, ‘addresses the need for all types of housing, including affordable housing...’ and ‘caters for housing demand and the scale of housing supply necessary to meet this demand’.
- 5.16 The wording in the NPPF has been extensively debated at in the courts notably at decisions in Warrington and Kings Lynn³³. The latter decision provides a number of clear statements, that the NPPF is clear that affordable needs should be addressed in determining the Full Objectively Assessed Need, but neither the NPPF nor the PPG suggest that they have to be met in full when determining the OAN. The decision highlights that

‘...very often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice.’

³³ CO/4055/2014 – Satnam Millenium Limited V Warrington Borough Council (19th February 2015)
CO/914/2015 - Borough Council of Kings Lynn and West Norfolk v Secretary of State for Communities and Local Government and Elm Park Holdings (9th July 2015)

- 5.17 The Kings Lynn decision references the PPG which provides further advice stating³⁴

'An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.'

- 5.18 When considering this matter the High Court concluded that the consideration of an increase to help deliver the required number of affordable homes, rather than an instruction that the requirement be met in total, is consistent with the policy in paragraph 159 of the NPPF requiring that the SHMA “addresses” these needs in determining the Full Objectively Assessed Needs. Therefore the argument that the total need for affordable housing being met in the Full Objectively Assessed Need is not warranted by the NPPF or PPG. However whilst this is the case, the Council has effectively met the identified need as set out in paragraph 5.12.

- 5.19 The HEDNA calculates the affordable housing needs based upon the demographic growth before market signal responses. Therefore the 20% market signal response in Wycombe will deliver not only more homes in general, but also more affordable housing to help meet the needs of the area.

6.0 Housing Land Supply and Unmet Needs

Policy Context

- 6.1 The supply of housing land is identified through the Housing and Economic Land Availability Assessment (HELAA)³⁵. All sites identified in the Local Plan have been assessed through the HELAA. Where there are particular constraints such as AONB or Green Belt, additional studies support the site appraisal, these are all referred to in the HELAA (see Appendix 1 of the HELAA for further detail).

³⁴ PPG Paragraph: 029 Reference ID: 2a-029-20140306

³⁵ Housing and Economic Land Availability Assessment (September 2017)

- 6.2 The requirements are set out in paragraph 159 of the NPPF and PPG under the section 'Housing and Economic Land Availability Assessment', which gives detailed guidance on how to assess the supply of land for housing (and economic development).
- 6.3 Local planning authorities should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.³⁶
- 6.4 The assessment should identify all sites and broad locations regardless of the amount of development needed to provide an audit of available land. The process of the assessment will, however, provide the information to enable an identification of sites and locations suitable for the required development in the Local Plan³⁷.
- 6.5 A range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate should be assessed. The assessment should consider all sites and broad locations capable of delivering 5 or more dwellings³⁸.
- 6.6 The supply of housing land should be assessed through a 5 stage process: Stage 1: Site / broad location identification (desk top and site surveys); Stage 2: Site / broad location assessment (suitability, availability and achievability); Stage 3: Windfall Assessment; Stage 4: Assessment Review; and Stage 5: Final evidence base (5 year housing land supply and trajectory)³⁹.

³⁶ PPG Paragraph: 045 Reference ID: 3-045-20141006

³⁷ PPG paragraph: 009 Reference ID: 3-009-20140306

³⁸ PPG paragraph: 010 Reference ID: 3-010-20140306

³⁹ PPG paragraph: 006 Reference ID: 3-006-20140306

- 6.7 The Duty to Cooperate places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters⁴⁰.

How the land supply position has evolved

- 6.8 The development of the housing land supply position has involved a combination of developing the evidence base to test the potential from different sources of supply (sometimes jointly with other authorities), working with other authorities and agencies under the Duty to Cooperate to test the emerging supply position, and undertaking public and stakeholder engagement to examine the emerging supply position as well.
- 6.9 A call for sites was first undertaken when the plan making commenced in 2012. A further call for sites took place in April 2013 and then part of 'community conversations' consultation in June 2013. A further call for sites exercise also took place as part of the 2014 Options Consultation (April 2014). This was the first consultation when options for the supply of land were considered for the Local Plan, this was an early stage of the Regulation 18 consultation.
- 6.10 From early on when the draft SHMA was produced (January 2014) it was clear that a wide range of more challenging options would have to be considered, albeit within an authority with significant planning constraints, identified in NPPF paragraph 14 footnote 9. Most notably the district has 48% Green Belt and 71% AONB coverage, which is over 75% one or the other. The Options consultation provided an initial indication of the known housing land supply at that time, and this indicated a significant shortfall of supply against the estimated housing OAN at that time. The unmet need was in the region of 4,700 homes, based on the then Strategic Housing Land Availability Assessment (SHLAA) and SHMA work available.

⁴⁰ What is the duty to cooperate and what does it require? Paragraph: 001 Reference ID: 9-001-20140306

6.11 A wide range of options were consulted on in the Options consultation in early 2014 and feature in the Sustainability Appraisal⁴¹. The options were:

- building in the main urban areas and villages (including releasing employment sites);
- building on previously developed sites in the countryside;
- development of the greenfield reserve sites from the current Core Strategy;
- expanding villages in the AONB and beyond;
- undertaking a Green Belt review;
- Major expansion of Princes Risborough; and
- expanding other settlements at key locations on the transport network;
- a new settlement option.

6.12 From Spring/Summer 2014 through to 2016 work focused on investigating these different options in more detail, as summarised below. In addition the Council was working proactively with other authorities as part of the Duty to Cooperate. Initially this focused on defining the Housing Market Area and then a joint Housing and Economic Development Needs Assessment (see section 3 above).

6.13 Feedback from the options consultation showed a strong objection to the release of the 'reserve sites' for development. However the Council took the decision to release them for development in November 2014 as a result of five year housing land supply pressures. The Council then set up local liaison groups consisting of local residents/representatives to progress more detailed work on the sites including working with the Council and

⁴¹ Sustainability Appraisal (SA) of the Publication (Regulation 19) Draft of the Wycombe District Local Plan (September 2017)

landowners/developers on the preparation of development briefs (see Consultation Statement page 39 – 40).

- 6.14 From summer 2014 onwards more detailed work was undertaken in relation to the potential scale of growth at Princes Risborough. This included more detailed technical work, the establishment of a local Steering Group and a landowner/promoters forum, and more local community engagement on emerging issues and proposals. Further details are set out in the Princes Risborough Topic Paper.
- 6.15 In May 2015 a Joint HELAA methodology was consulted on and agreed between the Bucks authorities who make up the housing market area to ensure a consistent approach to the assessment of housing (and economic) land supply. In particular to ensure the sources of sites were consistent and that the same approach was taken when identifying if a site is deliverable or developable. It also includes an agreed approach to windfall assessment.
- 6.16 It was apparent from the emerging HEDNA which had since been jointly commissioned between the Bucks authorities and the work on the HELAA to date, that Wycombe and Chiltern Districts would find it difficult to meet all their objectively assessed need (OAN). A Memorandum of Understanding (MOU) was signed between Wycombe, Chiltern, Aylesbury Vale, the Bucks Thames Valley LEP (BTVLEP) and Bucks County Council⁴². This agreed in principle to Aylesbury Vale accommodating unmet housing (and employment land) needs from Wycombe and Chiltern Districts. This agreement did not fix the quantum of unmet needs that Aylesbury Vale would accommodate and indeed agreed to other joint working including a Green Belt assessment and to reviewing each other's draft HELAA work to help test all reasonable options for assessing housing land supply. In February 2016 this MOU was updated⁴³ to include South Bucks District Council in the light of the decision (November 2015) of South Bucks and Chiltern Districts to prepare a joint Local Plan and the consequential change to the best fit housing market area.

⁴² Buckinghamshire authorities Memorandum of Understanding (August 2015)

⁴³ Buckinghamshire authorities Memorandum of Understanding (February 2016)

- 6.17 In early 2015 the Green Belt Assessment commenced. This was undertaken by means of a two part process. A joint Green Belt Assessment (Part 1) commissioned by the Buckinghamshire Authorities (Aylesbury Vale District Council, Chiltern District Council, South Bucks District Council, Wycombe District Council, and Buckinghamshire County Council) to assess land parcels, 'General Areas', against the purposes of the Green Belt as defined in the National Planning Policy Framework (NPPF). A Part 2 assessment commenced after completion of Part 1, drawing on the findings from Part 1 for sites which warranted further assessment and including additional sites from developer promoted sites in the Green Belt and officer identified sites on the edge of main settlements. The assessment identifies whether exceptional circumstances exist to release sites from the Green Belt (see paragraphs 6.39 – 6.45 below for further detail).
- 6.18 In November 2015 the Council published a draft HELAA, which was first shared with the other Bucks districts to ensure the methodology had been consistently applied. This included housing supply from a number of the options listed in the 2014 Options Consultation, including emerging findings in relation to the Princes Risborough expansion area and the potential of the reserve sites. The new settlement option was discounted as no suitable locations were identified outside the Green Belt and AONB and other options were subject to the outcome of further ongoing work including the Green Belt assessment and the review of potential in main villages in the AONB.

Draft Wycombe District Local Plan June 2016

- 6.19 In June 2016 the Council consulted on a draft Local Plan as part of the ongoing Regulation 18 plan preparation process. This drew the different elements of the potential housing land supply together. Overall it indicated a potential supply of around 10,000 homes against a housing OAN of 15,100, giving a shortfall of 5,100 homes in terms of unmet housing need. This was based on the draft HELAA (November 2015) plus further detail known on the emerging Green Belt Assessment, AONB Site Assessment and Princes Risborough expansion area . The Council received a large number of

representations on the draft plan (see Stage 4b - Draft Wycombe District Local Plan, Page 57 of the Consultation Statement), many of them focused on the main housing proposals.

- 6.20 As a result of the shortfall, and also in response to the large number of representations on the Draft Plan, including from Aylesbury Vale who had commissioned GL Hearn to carry out a Capacity Review⁴⁴ of the District (August 2016), the Council examined further its housing land supply position to see whether any further potential could be identified. The review is in line with the Government's and the Bucks HELAA methodology and PPG which identifies a review process is required if there is insufficient supply to meet the objectively assessed need.

“Plan makers are required to revisit the assessment, for example changing the assumptions on the development potential on particular sites (including physical and policy constraints). If, following this review there are still insufficient sites, then it will be necessary to investigate how this shortfall should best be planned for. If there is clear evidence that the needs cannot be met locally, it will be necessary to consider how needs might be met in adjoining areas in accordance with the duty to cooperate⁴⁵.”

- 6.21 This requires the supply position to be reviewed where it is clear that the housing OAN is unlikely to be met. The review considered a wide range of possible sources of housing land supply and re-appraised their housing potential. This included:

- The reserve sites capacities
- Further review of Green Belt sites
- Scope for more development at Great and Little Kimble (previously rejected in the 2014 Options consultation)
- Reviewing densities on existing sites

⁴⁴ Review of Housing Capacity in New Wycombe Local Plan Consultation Draft (August 2016)

⁴⁵ PPG Paragraph: 026 Reference ID: 3-026-20140306

- Reviewing windfall assumptions and the scope for additional windfall allowances

6.22 As a result of that review process a detailed response was provided to Aylesbury Vale and published on the Council's website. This brought the unmet need figure down from 5,100 to 1,700⁴⁶. As a result of the Council identifying a potential housing capacity of 11,200 homes for the period 2013-33 and the housing OAN being adjusted in the HEDNA Update (December 2016) from 15,100 to 12,900 (see section 4 above) (note this pre-dates the corrected need figure which takes account of suppressed household formation, which was omitted in error in the HEDNA Update, but corrected in the HEDNA Addendum), Aylesbury Vale accepted this revised assessment of the housing land supply and agreed they would accommodate 1,700 unmet need in their Plan and an MOU was signed between the two authorities in December 2016 to agree this⁴⁷.

6.23 The Council has been finalising the detail of its HELAA and related evidence base since then. A key outstanding issue has been to clarify the expected level of housing delivery of the Princes Risborough proposed expansion area. A joint piece of work commissioned by the Bucks districts looked at delivery rates and lead in times on a number of potential strategic sites across the three southern Bucks districts, as well as considering issues of the overall market capacity of Aylesbury Vale to deliver housing (i.e. what can the market deliver in Aylesbury Vale, rather than how many sites have they got)⁴⁸.

6.24 In relation to Princes Risborough the study showed delivery rates/lead in times were optimistic in the Council's response to the GL Hearn review in November 2016. The study put forward two possible delivery scenarios for the main expansion area, the more realistic of which resulted in

⁴⁶ Review of Housing Capacity in New Wycombe Local Plan Consultation Draft (August 2016)

⁴⁷ Memorandum of Understanding between Aylesbury Vale District Council and Wycombe District Council to meet unmet housing needs (December 2016)

⁴⁸ Housing Delivery Study for Buckinghamshire, Wessex Economics (August 2017)

approximately 600 homes being delivered beyond the plan period, with a supply of 1,758 within the plan period.

- 6.25 Following this work, a further Buckinghamshire Memorandum of Understanding between Aylesbury Vale District Council, Wycombe District Council, Chiltern District Council, South Bucks District Council, and Buckinghamshire Thames Valley Local Enterprise Partnership was agreed in July 2017⁴⁹. This sets out an unmet housing need of 2,275 for Wycombe district to be accommodated in Aylesbury Vale. In September 2017 a final HELAA was published setting out a housing supply of 10,927. The final HELAA captures an additional year of completions within the plan period as of 1st April 2016, relative to the draft HELAA.
- 6.26 In September 2017 Bucks County Council also agreed the unmet need figure in the July 2017 agreement⁵⁰. The Duty to Cooperate report also notes that the Council has had no formal requests from any neighbouring authorities outside of the Housing Market Area for Wycombe to accommodate unmet need from those authorities.

Have all possible options to meet housing need been explored?

- 6.27 From the outset it has been clear that a step change in housing delivery must be required. Historically the Council has a good record of redeveloping PDL sites, mainly former industrial areas, however since the outset for this Local Plan it has been apparent that developing on more greenfield land would be required and that more sensitive options including Green Belt and AONB would have to be considered in detail.
- 6.28 The plan is based on a diverse range of sites from different sources. Due to the constraints of the District many of the sites are not straight forward and have constraints which limit their capacity for housing; nevertheless they have been found to be deliverable or developable subject to overcoming the

⁴⁹ Memorandum of Understanding between Aylesbury Vale District Council, Chiltern District Council, South Bucks District Council, Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP) and Wycombe District Council (July 2017)

⁵⁰ See Memorandum of Understanding between Wycombe District Council and Buckinghamshire County Council (September 2017)

constraints. The following section identifies all the main sources of land for housing supply, many of which have been continually reviewed throughout the plan preparation as and when new information has become available.

Development within the Green Belt

6.29 Due to high level of unmet housing need, the option for a Green Belt assessment was undertaken. Over 48% of the district is in the Metropolitan Green Belt, a significant constraint to development. The key question is whether there are exceptional circumstances to release Green Belt land and whether the approach the Council has taken to reviewing the Green Belt is consistent with the NPPF.

Green Belt Policy Context

6.30 Protection of the Green Belts around urban areas is a core planning principle of the NPPF. Policies for protecting Green Belt land is set out in section 9 of the Framework which emphasises the great importance that the Government attaches to Green Belts. The NPPF advocates openness and permanence as essential characteristics of the Green Belt stating that ‘the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open’ (paragraph 79). The NPPF details five purposes of the Green Belt (paragraph 80):

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.31 The NPPF also states (at paragraph 83) that once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation and review of the Local Plan, and that in defining boundaries local planning authorities must have regard to their intended permanence in

the long-term. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development (NPPF paragraph 84).

- 6.32 The PPG reiterates the importance of the Green Belt and clarifies how Green Belt may affect the ability of an area to meet housing need. When considered if housing and economic needs override constraints on the use of land, such as Green Belt the following is identified⁵¹:

“The National Planning Policy Framework should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan. The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include ... land designated as Green Belt ... The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”

- 6.33 The PPG gives guidance on whether local planning authorities have to meet in full the housing needs identified in needs assessments.

“Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs. However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.”⁵²

⁵¹ PPG Paragraph: 044 Reference ID: 3-044-20141006

⁵² PPG Paragraph: 045 Reference ID: 3-045-20141006

Is the Green Belt Review Consistent with National Policy?

6.34 A two part Green Belt Assessment has been undertaken, with Part 1 a joint study across Buckinghamshire. Part 1 is consistent with national policy as its purpose is to assess strategic parcels of land against the 5 Green Belt purposes (paragraph 80). This deals with a larger scale, to give a review for the whole of Buckinghamshire and therefore the parcels sizes are strategic size, recognising that the Green Belt is a strategic designation.

6.35 Part 2 has been carried out by WDC. A draft methodology⁵³ was worked up with the other Bucks Districts, this was later finalised with the Green Belt Assessment Part 2 report. Part 2 deals with much smaller parcel areas from sub-areas identified in stage 1, plus sites identified by developers and a small number of officer identified sites on the edge of main villages. The following process has been carried out for Part 2:

- Reassesses of Green Belt Purposes in line with paragraph 80 of the NPPF for the smaller sub-parcel area. It uses a scoring system for the assessment, with 0 not meeting the purpose and 5 meeting the purpose strongly. See figure 4.2 of the Green Belt Part 1 Report for the scoring system. The results are summarised on page 73 – 87 of the report.
- Identifies whether there are boundaries that are capable of being permanent and enduring beyond the plan period, in line with paragraph 85 of the NPPF.
- Assesses wider planning constraints as set out in the ‘suitability’ criteria for the HELAA, plus consideration on whether a site is ‘achievable’ and ‘available’ in line with the HELAA methodology to identify if a site is released from the Green Belt whether it would be ‘deliverable’ in line with paragraph 47 of the NPPF. Given that developer promoted sites are normally available, this warranted their inclusion for part 2 of the assessment.

⁵³ Draft Green Belt Assessment Part 2 Methodology (July 2016)

6.36 Part 2 also focuses on sustainable locations for growth, as set out in the Settlement Hierarchy report, to promote sustainable patterns of development in line with paragraph 84 of the NPPF. On this basis a smaller number of officer identified sites were considered through stage 2. In considering alterations, the Green Belt boundary Part 2 of the assessment follows that identified in paragraph 85 of the Framework which states that 'when defining boundaries, local planning authorities should:

- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not include land which it is unnecessary to keep permanently open;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'

Have exceptional circumstances been demonstrated to remove land from the Green Belt?

6.37 Whilst there is the overarching plan-making framework provided by the NPPF and the Act there is no specific prescribed national definition or methodology for assessing the Green Belt or for demonstrating that exceptional circumstances do (or not) exist. Ultimately it is an exercise of planning judgement.

6.38 Figure 2 of the Green Belt Part 2 Report sets out the site assessment process. Passing Steps 1 to 3 means that a site can be considered for removal from the Green Belt. Step 4 is an assessment of whether the exceptional circumstances (required by the NPPF) are met. The Council's position is that exceptional circumstances will exist where (in addition to passing Steps 1 to 3) the scale of unmet need balanced against the contribution a site makes to the function of the Green Belt weighs in favour of release. Step 4 for whether exceptional circumstances have been met requires the following to be satisfied:

- i. The location is capable of contributing to sustainable development. This means it must be a logical extension to an existing settlement in Tiers 1-4 as identified in the Settlement Hierarchy. (Settlements in these tiers include all identified transport hubs).
- ii. The site is capable of removal from the Green Belt. In this context, a site is considered 'capable' of removal from the Green Belt when its removal from the Green Belt could be acceptable having regard to a) the purposes of including land in the Green Belt, b) the general extent of the Green Belt, and c) the requirement for permanent and robust boundaries. On its own, 'capable' does not mean that there are 'exceptional circumstances'.
- iii. If proposed for housing, the site must also be a deliverable or developable site in the terms set out in para 47 of the NPPF (footnotes 11 and 12) – this means that it is suitable from a detailed sustainability perspective, and has a reasonable prospect of delivery within the plan period, thereby contributing to meeting the OAN.
- iv. The OAN is not being met from other sources of supply and the scale of unmet need balanced against the contribution a site makes to the quality and function of the Green Belt weighs in favour of release.

Findings of the Green Belt Assessment

6.39 Part 1 of the assessment shows it is clear that the majority of the Buckinghamshire Green Belt is performing an important role in terms of the NPPF purposes. Six more weakly performing sub-areas were identified, which were recommended to be considered through Part 2. See Part 1 Green Belt Report, Table 6.1 for summary of recommendations.

6.40 The outcome of the Part 2 assessment has demonstrated there are exceptional circumstances to release Green Belt sites for housing. Just under 1,150 additional dwellings have been identified through the Green Belt Assessment, these have all been allocated in the Local Plan. This contributes to just over 10% of the Plan's housing land supply, a significant contribution. There are no other sites that demonstrate exceptional circumstances for removal.

- 6.41 It is recognised that some may question why the Council is reviewing the Green Belt at all and also point to the additional criteria to inform the circumstances for when a review could take place in the Housing White Paper.
- 6.42 The current NPPF does not seek to define what the exceptional circumstances might be for reviewing the Green Belt and so the Council has to take a view, as the only time that a review can take place is through a local plan process. Given the situation in relation to unmet need (housing and other development) the Council considered that it had to explore the option of releasing land from the Green Belt as part of testing the reasonable alternatives, but still respect that great importance attached to Green Belts in national policy – hence the approach the Council has taken that is set out above.
- 6.43 In relation to the Housing White Paper, as noted above this is not yet Government policy. However the Council’s approach is consistent with the proposals:
- All PDL options have been explored, including the release of underutilised employment land and including estate regeneration. Several social housing redevelopment schemes have been identified by Red Kite and included in the supply.
 - This assessment also now includes PDL sites which were previously excluded from consideration on the basis that they were in lower tier settlements (or isolated in the countryside) (see paragraph A63 of the Housing White Paper). A small number of additional sites have been progressed through Step 1 on this basis.
 - At paragraph A63 the White Paper suggests that Green Belt reviews should prioritise land adjoining transport hubs. Transport Hubs are not yet defined nationally so the Council has developed its own definition as part of the detailed methodology. The settlement hierarchy is itself based on a number of sustainability criteria, including access to public transport. The report concludes nothing

would change in the final Part 2 assessment in response to including transport hubs as the settlement hierarchy already includes details on access to public transport.

- 6.44 Paragraph 85 of the NPPF indicates that when defining Green Belt boundaries, authorities should, where necessary, identify areas of safeguarded land to meet longer term development needs beyond the plan period. However, this would involve identification of land that is harmful to the Green Belt and, given that the Plan cannot identify sufficient housing capacity from the Green Belt and elsewhere to meet the housing OAN it would not be appropriate to safeguard additional land by removing it from the Green Belt.

Development within the Chilterns Area of Outstanding Natural Beauty

- 6.45 Over 70% of Wycombe District is within an Area of Outstanding Natural Beauty (AONB), much of which is also Green Belt land. Given the extent of the AONB it was important for the Local Plan to consider whether any development could be acceptable in the AONB without harm to this special protected landscape. Please refer to the Natural Environment Topic Paper (Topic Paper 7) for the environmental aspect of the AONB.

Policy Context

- 6.46 AONBs are designated by the Government for the purpose of ensuring that the special qualities of the finest landscapes are conserved and enhanced. The Framework (paragraph 115 and 116) identifies:

“Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.”

“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be

demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

the need for the development, including in terms of any national considerations,

and the impact of permitting it, or refusing it, upon the local economy

the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”

6.47 In our local circumstances meeting the full OAN would be highly likely to require allocations for major development in the AONB.

Are there exceptional circumstances for major development within the AONB?

6.48 As noted above, major development within an AONB should only be approved in exceptional circumstances and where it can be demonstrated that this is in the public interest. The Council has taken an analogous approach to allocated sites within the AONB which is consistent with paragraph 116 of the Framework. Paragraph 116 identifies three issues that should be considered as part of this assessment:

1. the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy

2. the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way

3. any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated

6.49 Increasing the supply of housing across the Country is a clear national consideration. At a local level this translates to the requirements set out in NPPF 47 (and elsewhere). The scale of need is quantified by the HEDNA, and as noted previously, meeting full housing needs is likely to require major

development in the AONB. Allocating major sites for greenfield development in the AONB would not only help to meet the need for housing but it would also have some benefit to the local economy in terms of construction activity and consumer spending. However, as there is scope to meet these needs outside of the AONB but still in the same economic and housing market areas, any benefits of developing in the AONB would not be additional benefits overall, and should not attract significant weight (within the district and outside the district).

- 6.50 The scope for meeting a large proportion of development needs beyond the AONB is demonstrated by the combination of the other emerging allocations in the plan (including the significant growth planned at Princes Risborough) and the scope for accommodating unmet need within the Housing Market Area (HMA) in Aylesbury Vale.
- 6.51 Point 3 requires a site specific consideration of specific impacts. In general however, most (if not all) potential allocations in the AONB would have to be greenfield allocations on farmland or other countryside. Given the sensitivity of the AONB landscape and the weight to be given to its conservation it is reasonable to conclude that such allocations are likely to have some “detrimental effect on the environment, the landscape and recreational opportunities”, although the degree will vary site-by-site.
- 6.52 Taking all of the above into account the Council has concluded firstly that there is nothing exceptional about an AONB acting as a constraint on housing supply. Indeed the NPPF at paragraphs 14 and 47 assume that this will be case.
- 6.53 We have also concluded that the balance of public interest does not weigh in favour of allocating sites that would be considered to be major development in the AONB. Increasing the supply of housing is in the public interest, but so too is conserving the AONB. This requires a balance to be struck and in striking this balance the NPPF advises that we give great weight to the AONB. This mirrors and supports local aspirations (expressed in the draft new local plan) to ‘Cherish the Chilterns’. The Council’s view is that in balancing the harm against the benefits it would not be in the public

interest to allocate for major development in the Wycombe District portion of the Chilterns AONB in order to meet the margin of unmet need that exists. The Council does not consider there are exceptional circumstances for major development within the AONB.

- 6.54 Finally, whereas we are able to consider removing land from the Green Belt as part of the Local Plan, we are not able to alter the AONB boundaries, which are established under parliamentary approval. That is why Framework 115 and 116 are unavoidable constraints on the suitability of possible allocations in the AONB.

What is major development in the AONB?

- 6.55 The AONB report sets out a methodology for what is considered 'major development' (see section 3 methodology, Stage 4). A series of 4 questions are considered:

Q1 What is the local context for each site, in terms of:

- The scale of the allocation in proportion to the existing settlement?
- The spatial relationship of the allocation to the existing settlement in the context of settlement form, taking account of the guidance on settlement forms in the Chilterns Building Design Guide?

Q2 What potential is there for a serious adverse impact on the AONB, in terms of:

- Landscape impact?
- The impact on the quiet enjoyment of the AONB?
- Wildlife/habitat impact?
- Heritage impact?

Q3 Can the proposed allocation be sensibly described as 'major' in the normal meaning of the word?

Q4. Cumulative impacts (where there are multiple adjoining sites)

- Are there several potential sites within the same location?
- What will their cumulative impacts be?

- 6.56 Any one of these four core questions could potentially trigger a classification as 'major development' in the AONB but this is to be approached with care. In particular, development which cannot sensibly be described as major in the normal meaning of the word should not be classified as 'major'. This is not an assessment of whether development would necessarily be acceptable in the AONB, it is simply an assessment of whether development would be classified as 'major'.
- 6.57 These criteria have been developed working jointly with the Chilterns Conservation Board, Natural England and our neighbouring authorities in Buckinghamshire. See Duty to Co-operate Report, see section 3 Strategic Planning Issues Statement - Chilterns AONB.

Findings of the AONB Assessment

- 6.58 The Local Plan identifies a series of sites within the AONB. These are green field sites at Stokenchurch and Lane End where the settlement falls outside of the Green Belt but is washed over by the AONB. These sites were first considered in the 2015 HELAA where it was considered these sites should be looked at in more detail in terms of landscape impacts. A wider search was carried out in the AONB to see whether development could be suitable in other AONB villages (where it was not within the Green Belt as these were considered through the Green Belt Assessment). Other settlements were considered unsustainable locations for development as they were below Tier 4 in accordance with the settlement hierarchy.
- 6.59 Sites in Stokenchurch and Lane End went through a 3 stage assessment. First and initial assessment to look for reasonable options to consider in further detail; stage two carried out a detailed landscape assessment and stage 3 applied the HELAA criteria to identify whether a site would be deliverable. Part of the stage 3 assessment included whether the site would be major development (see section AONB Site Assessment Report for further detail on major development in the AONB). The AONB Site Assessment report resulted in 4 sites (2 in Stokenchurch and 2 in Lane End) recommended for Local Plan allocation for housing. Whilst not major

development these greenfield sites are an important contribution to the growth of the district, contributing 174 dwellings towards the housing supply.

Developing in main villages outside of the AONB

Great and Little Kimble

- 6.60 Through the review process after the draft plan options consultation (June 2016), the position in relation to Great and Little Kimble, both in terms of overall sustainability as settlements for growth and the potential impact on the AONB was reviewed. The settlement hierarchy report originally identified Great and Little Kimble as a Tier 5 Settlement. The Parish, which has a number of small hamlets in addition to the two villages, benefits from good public transport accessibility. In the light of this review it was considered Great and Little Kimble should be moved up to a tier 4 settlement and therefore scope for new development was considered.
- 6.61 A Landscape Appraisal for Great Kimble was completed in September 2017⁵⁴. This assessed the development potential of land around Little Kimble, Great Kimble and Smokey Row, but outside of the AONB and the Green Belt. The report assessed 9 field parcels and as a result identified 8 smaller sites to be assessed for development potential. The results range from medium/low to high capacity for residential development. 3 sites were identified to have development potential taking into account findings of the Landscape Assessment and wider HELAA site assessment.
- 6.62 The assessment has identified scope for some limited development (around 160 dwellings included completions, permissions and small sites windfall allowance⁵⁵) without significant harm to the character of the landscape and setting of the AONB. However limited services and facilities exist and therefore further development is not considered sustainable. Sites are not allocated within the Local Plan as the parish council are preparing a Neighbourhood Plan, therefore the precise allocations will be for the neighbourhood plan to allocate.

⁵⁴ Kimble Landscape Appraisal (September, 2017)

⁵⁵ See HELAA paragraph 71 (September 2017)

Longwick

6.63 The potential for growth at Longwick has been considered in detail. A Neighbourhood Plan has been published for Longwick-cum-Ilmer parish. In recent times there has been a significant amount of new development permitted in Longwick. The capacity for development has been assessed and the Neighbourhood Plan is looking to allocate six housing sites for development. In total approximately 300 homes will be delivered from the plan period (including completions, permissions and a small sites windfall allowance⁵⁶) through the neighbourhood plan. This is a significant step change in growth from historic delivery rates.

Princes Risborough Expansion Area

6.64 From mid-2014 a significant amount of work and public/stakeholder engagement was undertaken to test the most appropriate scale of growth at Princes Risborough and the associated infrastructure requirements for major growth. The Princes Risborough Topic Paper explains in more detail the process that was undertaken, the technical work commissioned and the options tested. A significant proportion of the supply is at the Princes Risborough expansion area which at the time was being taken forward as a separate development plan document (an area action plan). In February 2016 the Princes Risborough Draft Town Plan was consulted on with a proposal for a 2,000 – 2,500 home expansion to the west of the town. As timetables started to align with the Local Plan the Town Plan has been merged to be part of the Local Plan.

6.65 Princes Risborough expansion is identified as a key element of the strategy to meet the district's housing need. The Issues and Options consultation in 2014 identified three options for the level of housing growth, with 2,500 being the highest option. The extent of growth at Princes Risborough has continued to be reviewed. The Princes Risborough expansion is a complex scheme to deliver. However the Council is confident that most of the

⁵⁶ See HELAA Table 11 (September 2017)

scheme will be delivered within the Plan period up to March 2033 for the following main reasons:

- A considerable amount of detailed technical work (initially as an Area Action Plan proposal, now incorporated in the main Local Plan) has been undertaken to set out how the expansion should take place and be delivered;
- The Council has been working proactively with the community (through a local steering group) and the developers/landowners on working up the proposals, and has also engaged the services of ATLAS to assist in this process.
- Despite significant infrastructure costs, viability work clearly shows the scheme is viable;
- The vast majority of the land is controlled by 3 house builders. Having multiple developers/outlets on the site will assist with strong delivery.

6.66 The Council has been successful securing capacity funding from DCLG to take forward the next more detailed stage of (post Local Plan evidence base) planning, including more detailed master planning and infrastructure delivery planning. This work is already underway to ensure the right framework is in place to guide development, should planning applications come forward that twin-track the latter stages of the Local Plan process.

Princes Risborough Housing Delivery

6.67 'A Housing Delivery Study for Buckinghamshire' (August 2017), has been carried out by consultants Wessex Economics. This study examines a range of issues associated with the delivery of new homes in Buckinghamshire in the period up to the end of March 2033. The study specifically tested the lead in times and anticipated delivery rates of five large strategic sites across southern Buckinghamshire, which for Wycombe included the Princes Risborough Expansion Area. The report uses information directly from the three main developers; Halsbury, Bloor and Persimmon, considers site specific delivery issues and takes account of national studies looking at lead

in times and build rates for large housing sites. This allowed Wessex Economics to test different scenarios for delivery in light of the various constraints at Princes Risborough.

- 6.68 Two scenarios were tested, with scenario two being less optimistic in terms of lead in times and delivery rates. Scenario 2 was considered to be the more robust, with a total of 1,758 homes anticipated to be within the plan period and 599 beyond the plan period. This takes into account the significant infrastructure requirements, including the relief road. The scenarios allow for a build-up period of around 4 years to achieve peak housing completions and an assumed average delivery rate of 183-185 dph during the main phase of construction. However because of the different sizes of landholdings between the main developers (Bloor controlling the largest part of the site), some developers are likely to complete their development before others and build rates will tail off towards the end of the development. As a result across the whole development period the build rate is around 157 dwellings per annum which is very close to the national average of 160 per annum for sites of this size set out in the NLP report⁵⁷.
- 6.69 Unless there is a significant impetus that reduces the lead in times, particularly in terms of early infrastructure delivery, then the faster scenario in the Delivery Study is unlikely to come to fruition. The Council is confident that the delivery for Princes Risborough is realistic and deliverable.

Former Reserve Sites

- 6.70 The Council agreed to release the reserve sites for development ahead of the Local Plan given the Council was no longer able to identify a 5 year housing land supply. The sites are Abbey Barn North (High Wycombe); Abbey Barn South (High Wycombe); Gomm Valley and Ashwells (High Wycombe); Slate Meadow (Bourne End); and Terriers Farm (High Wycombe).

⁵⁷ Start to Finish: How Quickly do large-scale housing sites deliver (NLP November 2016)

- 6.71 Whilst these sites have been released⁵⁸ for development, they have significant constraints. For example, Slate Meadow has significant areas of flood risk and a village green limiting its capacity, while Gomm Valley has a number of environmental constraints, includes areas of nature conservation importance (including a SSSI) and high landscape value. Abbey Barn North and Abbey Barn South also have significant highway constraints to be overcome. Terriers Farm adjoins the AONB and a Conservation Area. The Council's response (November 2016) to the Aylesbury Vale commissioned GL Hearn review of housing capacity explains these constraints in more detail and these constraints explain why there is little scope to increase the capacity of the reserve sites to accommodate development. Whilst these constraints exist, the former reserve sites do provide a significant contribution to the housing supply (approximately 16%).
- 6.72 See HELAA paragraph 101 for further detail on the review of reserve sites capacities. By agreeing to release these sites in advance of the Local Plan process, this has helped to:
- progress more detailed assessments of the sites, thus helping to understand their constraints and capacity better;
 - progress development briefs (2 have adopted briefs, 2 have drafts that have been published and consulted on) to facilitate planning applications, helping to bring forward their delivery and ensure community involvement in the development of those briefs.

Other Options for reducing unmet Housing Need as identified in the HELAA

Review of site densities

- 6.73 As part of the review process developable areas and density assumptions have been considered further to ensure they are optimising development potential, but within development constraints and the principles of good place shaping.

⁵⁸ By means of a Cabinet decision in November 2014

- 6.74 There is no one size fits all approach to considering the potential of individual sites. They need to be looked at in their local context having regard to constraints. We consider it is not appropriate to apply blanket densities to sites. Furthermore, density needs to be considered on a net density basis, not gross density, where site constraints are factored into identifying a net developable area. This will vary from one site to another and one area to another.
- 6.75 The Sustainability Appraisal⁵⁹ tests reasonable alternatives, one of which includes the option of increasing site densities (included in options C, D and E). This is likely to result in a residual negative effect of greater significance on landscape and townscape compared to Options A and B (where density is not increased). Increased density on sites within, and in close proximity to, the AONB reduces the likelihood that mitigation will be able to reduce the significance of residual effects. Mitigation is likely to be more difficult and/or expensive and could result in a development that is not in keeping with the surrounding local character. Increased density at sites proposed through Options C, D and E could make it more difficult to effectively integrate with existing development and communities. It could also result in a lower delivery of open/green space and recreational areas at the sites. Increased growth and higher densities at Kimble proposed through Options C and E could result in the coalescence of a number of small settlements and these communities could potentially lose their identity. See Table VIC: Appraisal findings for the spatial strategy options of the SA for further details.
- 6.76 Intensifying development within Urban Area and Main Villages is an option in the SA which has been taken forward in the plan. This maximises use of sites in most sustainable locations on surplus land. This option is in line with the settlement hierarchy. Table 13 and 14 of the HELAA show average densities for settlement tiers and Greenfield vs Brownfield. This shows already good densities with an average of 117dph for PDL sites and 30dph for green field sites. For green field sites in particular there is a need to take

⁵⁹ Sustainability Appraisal (SA) of the Publication (Regulation 19) Draft of the Wycombe District Local Plan (June 2017)

account of sensitivity, for example topography and visibility, that could reduce net density as well as gross. In urban areas there are particularly high average densities with Tier 1 (High Wycombe) having an average of 126 dph. We have optimised site densities, maximising development whilst recognising the constraints.

Reviewing Employment Land

6.77 Historically the Council has seen a number of former employment sites redeveloped for residential development and has undertaken further work to identify further potential sites. In 2014 the Council commissioned PBA to undertake a review of employment sites to identify the suitability of those sites to continue in employment use and sites that could be redeveloped for housing. This was further supplemented by an internal officer review in 2015, culminating in a report to the Council's Cabinet in September 2015⁶⁰. Sites identified by both of these reviews have been included in the HELAA and contribute 396 dwellings towards the housing supply.

6.78 However as the Economic Topic Paper explains there is a shortage of employment land supply relative to the demand forecasts in the HEDNA so the release of additional employment land and premises to housing will further undermine the employment land supply. There are a limited number of employment sites being promoted for housing through the local plan process. These have been assessed and there are strong economic reasons for retaining those sites for employment purposes. We are confident that all sites which should no longer be retained for employment have been released for housing in accordance with paragraph 22 of the NPPF.

Review of Windfall

6.79 A windfall allowance may be justified in the 5-year supply if a local planning authority has compelling evidence as set out in paragraph 48 of the National Planning Policy Framework. Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall

⁶⁰ Short Term Employment Land Review Cabinet Report (September 2015)

allowance based on a geographical area (using the same criteria as set out in paragraph 48 of the NPPF)⁶¹.

- 6.80 A small sites windfall allowance has been included within the supply in accordance with paragraph 48 of the NPPF. The windfall supply identified within Wycombe District is only on small sites below the HELAA threshold of five units (net) in order to avoid double counting. The allowance is only included in years where no completions are counted on identified small sites, again to avoid any double counting of supply from small sites. A 10 year average has been identified as 43 units per annum. This approach ensures that the windfall allowance takes account of a period of time that reflects a full economic cycle, levelling out peaks and troughs. This assessment ensures a robust basis to project forward a future windfall allowance. Supply from residential intensification sites has been excluded to ensure no garden land was included, in accordance with NPPF paragraph 48. However analysis of the supply from residential gardens shows in the last ten years there has been a consistent delivery from this source of supply. On average 47 dwellings per annum have been completed on residential intensification sites. If this supply was to be included it would bring the windfall allowance to an average of 90 dwellings per annum. However due to NPPF compliance reasons this source of supply is not being including in the overall windfall allowance.
- 6.81 The conversion of office to residential 'Prior Approvals' are monitored and counted in the housing supply. Whilst there have been some dwelling completions in Wycombe District since the prior approval system came into effect (84 dwellings up to 1st April 2016), making an allowance at this point in time would not conform with Government policy. The test is whether there is 'compelling evidence that such sites have consistently become available'. Given that the changes only came in around 3 years ago and there is an inevitable lead in time before completions start to happen, there is no reliable 'trend data'. Historic windfall delivery rates only exist over a very short period of time, effectively 2 years. Also as the office to residential prior

⁶¹ PPG reference ID: 3-24-20140306

approval scheme started out as a temporary measure with an “end date” this is likely to have resulted in a spike of prior approvals before the deadline.

- 6.82 Whilst a windfall allowance is not counted from the conversion of office to residential, the assessment of employment land supply, incorporated into the demand/supply analysis in the HEDNA Addendum (September 2017) does make some assumptions in order to forecast loss of employment. This gives a total projected loss of 31,032 square metres of floorspace. If this was converting into dwellings, assuming a floorspace between 60 to 80 square metres, this loss of office space could provide an additional 388 – 517 dwellings for the plan period or 19 – 26 dwellings per annum. However for reasons identified above this is not within the windfall supply.

Other Previously Developed Land assessed through the HELAA

- 6.83 We have reviewed whether there is there scope for any more PDL. The Council is confident that all known deliverable/developable sites are included in the housing supply. The HELAA already includes a significant number of PDL sites (approximately 50%) including publicly owned sites/formerly publicly owned, estate regeneration sites, and poorly performing employment land.
- 6.84 All sites must have a reasonable prospect of delivery and therefore whilst there may be further PDL sites, they are not made known to the Council and therefore we have no certainty of the availability and deliverability. Several call for site exercises have taken place through the plan preparation and therefore we are confident all available land has been made known to the Council.

Other Rejected Options

- 6.85 Other options have been considered but rejected during the plan preparation. The options set out below are identified in the final SA.
- 6.86 **New Settlement** - This option has potential to make a significant contribution towards meeting housing need, however it wasn't taken forward

as no suitable locations were identified outside the Green Belt and AONB. This option was rejected early on after the 2014 options consultation.

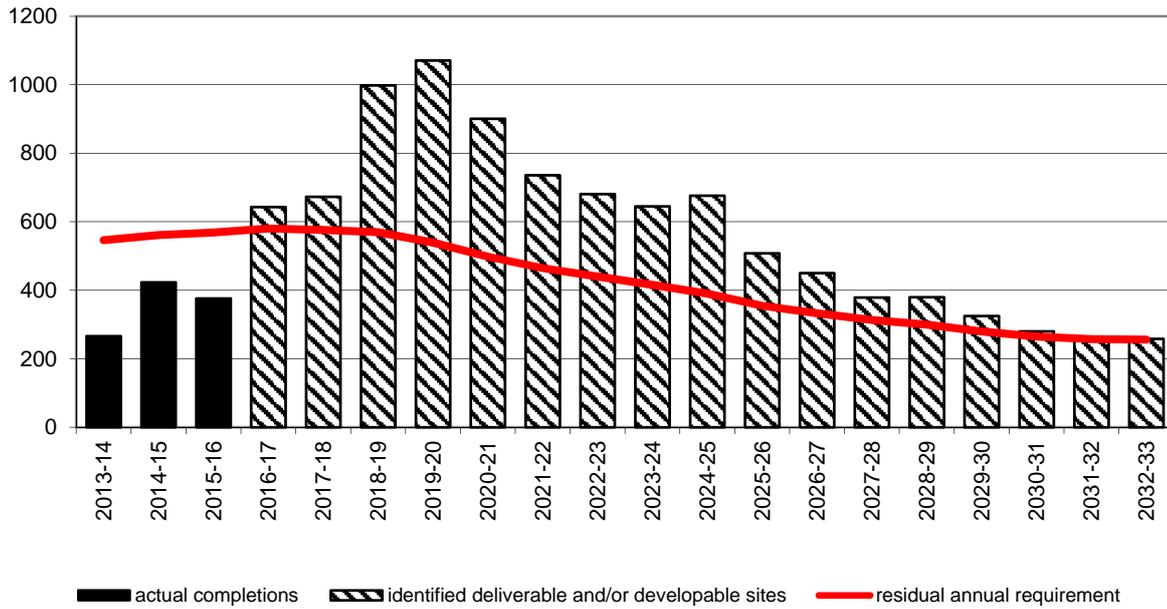
- 6.87 **Major expansion at Kimble** - This is a greenfield expansion at Great and Little Kimble identified due to its location on the A4010 and the railway station. This option was rejected early after the 2014 options consultation. As noted above, following a review later in 2016, some growth potential was identified and the Parish Council are producing a Neighbourhood Plan to accommodate that growth (see paragraphs 6.61- 6.63) which will be on greenfield sites. Whilst it constitutes a very significant level of growth for Great and Little Kimble, it is not identified as a major growth area on a District level.
- 6.88 **Major expansion at Saunderton** – Another of the 2014 options looked at brownfield sites in the AONB. This identified a former industrial estate (Molins) at Saunderton where the option to explore whether redevelopment of the site plus a wider area could create a more sustainable community by providing better local facilities (e.g. school, shop, community centre), taking advantage of its sustainability credentials due to its location on the A4010 and the railway station on the main Birmingham to London railway line. In May 2015 Cabinet decided to proceed with exploring an Area Action Plan. A Task and Finish Group of the Improvement and Review Commission (i.e. the Council's scrutiny function) was established to look at whether this option should be pursued. Two public meetings were held to allow the public to air their views on the proposals. The public was invited to make written submissions October 2015.
- 6.89 At a Cabinet meeting held in November 2015, it was agreed that the Saunderton Area Action Plan be abandoned in favour of future development being progressed through the Neighbourhood Plan (a much smaller scale) for the parish of Bledlow-cum-Saunderton.
- 6.90 **Major expansion at Stokenchurch** - Greenfield expansion at Stokenchurch identified due to its location at junction 5 on the M40. Stokenchurch lies within the AONB. The AONB Site Assessment report concludes there are no exceptional circumstances for major development

within the AONB, as such this option has not been taken forward, instead smaller scale 'non-major' development has been identified. This option was rejected early on after the 2014 options consultation.

7.0 Housing Target and Delivery

- 7.1 Based on the process outlined above the Publication Version of the Plan sets a housing requirement/target of 10,925 dwellings (2013-33) which is 546.25 dwellings per year (referred to as 546 per year hereafter). This is a capacity led target, supported by the outcome of the Council's Duty to Cooperate discussions.
- 7.2 This delivers around 83% of the Districts housing OAN in an authority where over 75% of the District is constrained by NPPF para 14 footnote 9 constraints. It also represents over 35% increase on the level of housing provision set out in the Wycombe Core Strategy (2008). As such, despite the constraints, a step change in housing delivery is identified and planned for in the Local Plan.
- 7.3 The Council considers that the Plan will provide strong housing delivery up front during the first 5 and 10 year periods of the plan period. This is illustrated in the housing trajectory below (See appendix 7 of the HELAA report for further details):

Figure 1: Housing Trajectory 2013-33



7.4 There are a number of reasons for this strong delivery. These include:

- A good level of planning commitments ensuring there is a strong 5 year housing land supply
- A good spatial distribution across the District ensuring that different local sub-markets are accessed
- A good range of site sizes providing opportunities for different operators in the market to deliver at the same time.

7.5 The following paragraphs provide more detail on these factors. Table 4 (overleaf) sets out the different levels of commitment of supply in the Plan.

Table 4 Make-up of housing supply

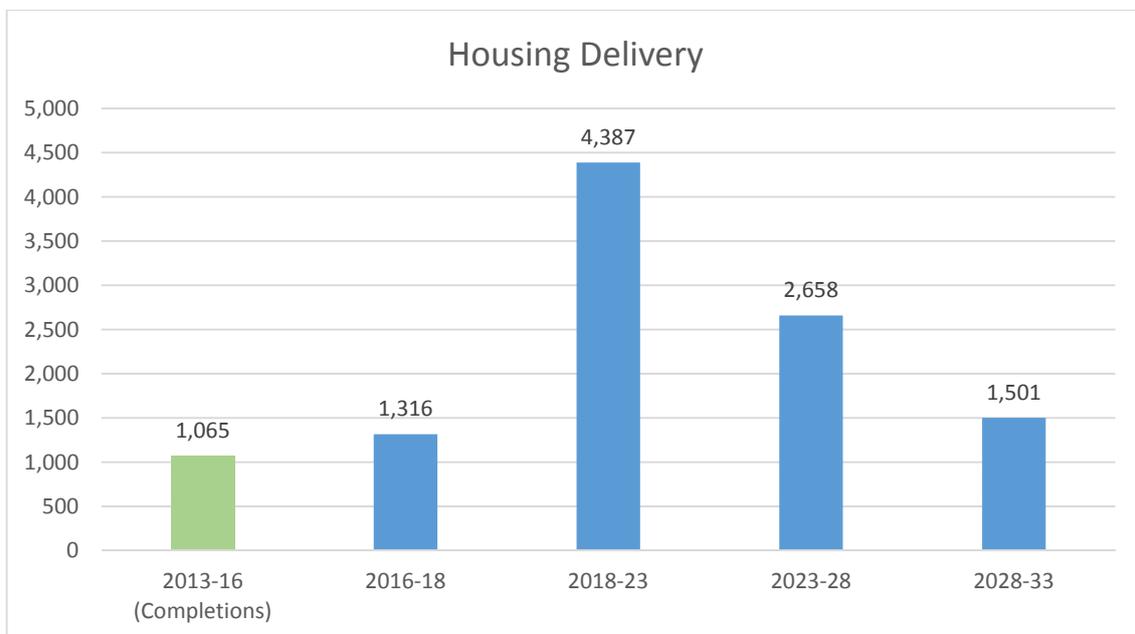
Type of site	Net Dwellings
Completions (2013-16)	1,065
Sites with permission at 1/4/16	1,232
Sites with under construction at 1/4/16	1,224
Allocations in the Delivery and Site Allocations Plan	579
Allocations in made Neighbourhood Plans	20
Allocations in the new Local Plan	5,823
Allocations to be made in Neighbourhood Plans	425
Windfall	559
Total	10,927

7.6 This shows over 3,000 dwellings committed through existing permissions and existing allocations. In addition, the reserve sites, although allocated in the Plan, the Council has already made an in-principle commitment in November 2014 to release the sites for development to help address a shortfall against the 5 year housing land supply. The Council has been working proactively with the community (through local liaison groups) and developers/landowners to bring forward development on these 5 sites. Development briefs have been produced for 4 of the 5 sites (2 adopted, 2 in draft) and pre application discussions are progressing on a number of sites. In total, including completions, permissions and allocations in adopted/"made" plans, nearly 35% of the total housing supply of the Plan is already committed. When the reserve sites are included, this increases to over 50%.

7.7 Other sites in the housing land supply that are allocated in the plan are also making good progress through the development management process and will contribute to delivery in the current 5 year period (2016-21) and the 5 year period during which the plan will be examined (2018-23). Table 2 sets out the broad anticipated phasing over the plan period.

Table 5 Housing Delivery Profile

Timing	Net number of dwelling (approx. and rounded)
2013-16 (Completions)	1,065
2016-18	1,316
2018-23	4,387
2023-28	2,658
2028-33	1,501
Total	10,927



7.8 In relation to the 5 year housing land supply, the position is as follows⁶²: The Council can demonstrate a 5 year housing land supply against an annualised target of 546 per year. This includes making up the shortfall in delivery from the first 3 years of the plan period (2013-16) and adding a 5% buffer. Overall there is a 6.2 year supply. See calculation overleaf:

⁶² Please note the number of years of supply for the periods 2016-21 and 2018-23 has been amended and differs from the figures published in Wycombe's HELAA (September 2017). It is only the number of years that has been changed, all other figures in the calculations remain the same, e.g. the target figures and supply figures.

5 year land supply position 2016-21 (current 5 year period)

Requirement = $546.25 \times 5 + 574$ shortfall (2013-16)

With 5% buffer = 3,470

With 20% buffer = 3,966

Supply = 4,286

7.9 There is a comfortable 5 year supply against 5% buffer, equivalent to 6.2 years supply in this period.

7.10 For the period 2018-23 the Council can demonstrate well in excess of a 5 year housing land supply against the annualised target of 546 per year. This includes making up the shortfall in delivery in the first 3 years of the plan period (2013-16) and adding a 5% buffer. Overall there is a 6.8 year supply for this period. See calculation below:

5 year land supply position 2018-23 (Plan examination/adoption 5 year period)

Shortfall/surplus 2013-18 = $1,065 + 643 + 673 = 2,381$

Requirement 2013-18 = 2,731

Shortfall = 350

5 year requirement 2018-23 = $2,731 + 350 = 3,082$

With 5% buffer = 3,236

With 20% buffer = 3,698

Supply = 4,387

7.11 There is a comfortable 5 year supply against 5% buffer, equivalent to 6.8 years supply in this period.

7.12 The Council applies a 5% buffer to its 5 year housing land supply assessment as there has not been persistent under-delivery in housing

delivery. Over the plan period to date of the Core Strategy (2006-16), the Council has exceeded delivery of the required 402.5 dwellings per year by around 12% (i.e. average annual delivery over 10 year of 452 dwellings per year). Recent monitoring information for the 2016/17 monitoring year indicates a total of 788 net dwelling completions, the highest level of housing delivery in a single year for at least 15 years. Note the Council will update the assessment of the supply to take account of the full 2016/17 monitoring information prior to submitting the Plan for examination.

- 7.13 There has been a recent appeal decision that has accepted the 5% buffer, for Land at Molins Sports Ground, Princes Risborough⁶³ (July 2017). Paragraph 21 identifies *'The Secretary of State agrees with the Inspector's assessment at IR164-173. He agrees that the 2016 HEDNA figure provides the most up-to-date assessment of FOAN for the district (IR164) and that a 5% buffer is appropriate (IR165).'*

⁶³ Former Molins Sports Ground, Monks Risborough Appeal Reference APP/K0425/W/16/3149747

Table 6: Housing Supply Against Core Strategy Target

Year	Net Dwelling Completions	Original and Residual Requirement	Original and Adjusted Target per annum	Performance Against Adjusted Target
2006-07	607	8,050	402.5	151%
2007-08	611	7,443	391.7	156%
2008-09	625	6,832	379.6	165%
2009-10	304	6,207	365.1	83%
2010-11	575	5,903	368.9	156%
2011-12	514	5,328	355.2	145%
2012-13	223	4,814	343.9	65%
2013-14	266	4,591	353.2	75%
2014-15	423	4,325	360.4	117%
2015-16	376	3,902	354.7	106%
Total	4,524	3,526	352.6	
2006-16				

7.14 Looking at the 10 year period up to 2028 (i.e. broadly 10 year period from examination/adoption), the total delivery from the start of the plan period in 2013 to 2028 is 9,426 dwellings or 628 homes per year. This level of delivery is comfortably in excess of the annualised target of 546 per year, or a surplus of 1,232 dwellings over requirement.

7.15 In relation to the requirements of the NPPF paragraph 47, the Plan:

- Provides for a 5 year supply of deliverable sites (2018-23)

- Identifies developable sites and broad locations for years 6-10 (up to 2028)
- Also identifies sites and broad locations for years 11-16 (up to 2033 – the end of the plan period)

7.16 Paragraph 47 requires authorities to identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15. The Plan makes provision for the whole plan period.

7.17 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 (137 dwellings) and Longwick (5 dwellings) parishes, where Neighbourhood Plans are being prepared. For Kimble 160 dwellings are planned for the plan period once taking into account completions and small sites permissions since the start of the plan period and windfall– for further detail see paragraph 71 in the HELAA, September 2017. For Longwick this is in addition to the known proposed neighbourhood plan sites (282 dwellings) totalling to 300 dwellings for Longwick, having taken into account completions, small sites permissions since the start of the plan period and windfall – for further detail see Table 11 in the HELAA, September 2017. Since the 2016 base date Longwick has had significant commitments. 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 or other plans that are and will continue to form part of the development plan. Where there is a planning commitment sites have been phased within the 5 year supply, otherwise sites have been phased outside of the 5 year supply depending on their certainty of delivery.

7.18 The Plan achieves 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. These are summarised in Table 7:

Table 7 Housing Delivery Profile

Delivery period	Key sources of housing delivery
2018-23	Strong PDL site delivery including RAF Daws Hill Commencement and main delivery of reserve sites
2023-28	Completion of reserve sites delivery Commencement of Princes Risborough expansion area delivery Main period for delivery of Green Belt release sites Some PDL delivery
2028-33	Continuation of Princes Risborough expansion area delivery. Completion of larger Green Belt release sites.

7.19 The Housing White Paper highlights the importance of having a range of different types and size of sites to boost housing delivery. This includes encouraging the development of small and medium sized sites. Table 8 illustrates that 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.

Table 8 Site size range for housing sites in the plan

Supply by Net Site Size - 2013-33		
Overall Net Site Size	Number of Homes	% of supply
Under 10 units	1,750	16%
10 - 99 units	2,635	24%
100 - 499 units	3,651	33%
500 units & above	2,891	26%
	10,927	100%

7.20 The supply also provides a mix of types of sites. Just under 50% of sites are previously developed sites, mainly in the larger towns and villages, with the remainder being greenfield. Sites include estate regeneration sites being brought forward mainly by Red Kite Housing, the stock transfer housing association in the District.

7.21 Table 9 sets out the broad spatial distribution of the housing supply. The Strategy Topic Paper explains the basis of this distribution. From a housing delivery point of view the spatial distribution results in a good distribution across the area whilst focusing the most development around the largest and most sustainable built up areas.

Table 9 Spatial Distribution of housing in the Plan

Supply 2013 to 2033	Net Additional Dwellings
Tier 1 – High Wycombe	6,341
Tier 2 Settlements (made up of)	
Bourne End and Wooburn	798
Marlow	345
Princes Risborough	2,047 (599 to be completed after the plan period)
Tiers 3-6 total (made up of)	
Tier 3	465
Tier 4	484
Tier 5	123
Tier 6	312
Rural Areas	12
Total	10,927

7.22 The housing target is a capacity derived target. As such, even if justified, it would not be appropriate to include a buffer/allowance for non-implementation as any sites identified should contribute towards the overall capacity of the district. In any event, the sites identified are either “deliverable” or “developable” sites as set out in NPPF para 47. For the same reason the work on the Green Belt review did not identify any safeguarded land. This is because any land where it was considered there were exceptional circumstances for removing from the Green Belt, should be allocated to reduce the scale of unmet need and contribute to overall plan capacity for this plan period.

7.23 Notwithstanding the above, there is some flexibility in the housing supply, mainly due to the construction of NPPF policy in relation to windfall allowances. NPPF para 48 indicates in relation to making allowances for windfall sites that:

- “Authorities should have “compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply”
- “Any allowance should be realistic having regard to historic windfall rates and expected future trends”
- “Should not include residential gardens.”

7.24 The housing supply makes allowance for approximately 560 windfall dwellings for the period 2020-33 (43 per year). This relates just to small sites (under 5 units net) and is based on trends over the last 10 years (2006-16). This analysis excludes sites involving residential gardens. This almost certainly underestimates the overall level of windfall (unidentified/unallocated sites) that will actually come forward during the plan period for the following reasons:

- The Council permits and historically has seen delivery of housing development on suitable sites that consist of residential garden land, both above and below the 5 unit threshold for the windfall allowance. Only sites of this nature that have a permission are included in the housing land supply. Additional development on garden land will continue to come forward in the District and this Plan together with the extant Supplementary Planning Document on Residential Intensification provides a framework for such sites to come forward.
- The Council has seen significant levels of notifications for permitted development changes of use from office to residential, and some of these have been completed up to April 2016 (the base date for the housing land supply assessment). The supply assessment includes sites notified as of April 2016. However no projection forward of

potential housing delivery on either sites below or above the 5 unit threshold for site identification in the HELAA has been made, other than taking account of the limited numbers of small site PD office to residential conversions up to April 2016 in the longer 10 year trend windfall forecast. No allowance has been made in the housing land supply assessment because the NPPF requires “compelling evidence” and information on “historic rates”, but there is only approximately 2 years’ worth of completion data. This level of data clearly does not pass the NPPF test.

- 7.25 The windfall allowance in the Plan only applies to small sites (below 5 units net). In reality sites will come forward during the lifetime of the Plan that are not capable of being identified as being deliverable or developable in the HELAA at this time. Thus, whilst it is not appropriate to include additional windfall allowances to address these issues, awareness of these potential sources of supply does introduce an element of flexibility into the supply.

8.0 Affordable Housing Policy

- 8.1 The Framework looks to local planning authorities to boost significantly the supply of housing, and should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period (paragraph 47).
- 8.2 Paragraph 50 of the Framework states that to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should ...where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating

mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time (paragraph 50).

- 8.3 The Framework identifies in relation to viability (paragraph 173) that pursuing sustainable development requires careful attention to viability and costs in plan-making. The scale and of obligations and policy burdens should not be such that their ability to be developed viably is threatened. To ensure viability the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
- 8.4 The PPG identifies that Councils should also consider “an increase in the total housing figure” where this could “help deliver the required number of affordable homes”; although this would not be an adjustment to the OAN, but a policy response to be considered in the local plan.
- 8.5 The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes

Justification for the Affordable Housing thresholds, percentages included in the Plan

- 8.6 The thresholds for affordable housing included in the Publication Draft Wycombe District Local Plan (see Policy DM24) are taken directly from national standards, as set out in the Planning Obligation section of the PPG.
- 8.7 The Council requires all developments of 10 or more dwellings or more than 1,000 square metres of residential floorspace to provide on-site AH. 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. This lower threshold applies in the Chilterns AONB as a result of it being a designated rural area, under section 157 of the Housing Act 1985.

- 8.8 The percentages of affordable housing required for residential purposes set out in the Plan are 40% GIA⁶⁴ 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 disparity 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 land values tend to be higher.
- 8.9 The Whole Plan Viability Report tested various different affordable housing percentages (10, 20, 30, 40%) and concluded that 40% was viable in all locations, taking account of the CIL charge, on sites that are greenfield or were last used for business purposes or similar sui-generis employment-generating purposes. On all other sites, it concluded that 30% was viable. These percentages were therefore taken forward as the basis for the percentages used for affordable housing in the Local Plan.
- 8.10 The viability assessment supported the draft policy, with a number of generous assumptions about costs, and without allowing for vacant building credit. Whilst the viability assessment did not test the additional impact of vacant building credit, this will of course only serve to further improve the viability of schemes. As explained above, residential intensification sites tend to be more expensive in terms of their land values and as a consequence to be less viable than sites that were previously used for alternative uses such as, for example, employment purposes. The approach taken to such sites in the Plan is that whilst we recognise that these sites will be more expensive to purchase, the impact of vacant building credit on

⁶⁴ Gross internal area

such sites is likely to result in a reduction in the amount of affordable housing that is required on these sites and consequently these sites will become more viable. It is therefore proposed that a 30% requirement will be applied to residential intensification sites.

- 8.11 In the past Wycombe District Council's approach to affordable housing was based on total bedspaces, as opposed to dwelling units or GIA floorspace. The Plan proposes to change this approach so that it accords with the approach taken in the CIL.
- 8.12 The use of GIA ensures a genuinely proportionate approach to provision of affordable housing. An approach based purely on number of units would likely result in proposals for a high proportion of large market units, and a high proportion of small affordable units, undermining the delivery of larger affordable units and not resulting in a proportionate affordable housing contribution. The Council's approach in the Core Strategy based on bedspaces, supported by Inspectors at the Core Strategy examination and the previous Local Plan inquiry, was a means of overcoming that problem. Moving over to GIA provides a more proportionate approach without the complexities of defining exactly what is or is not a bedspace, and as noted above is already a measure for CIL purposes, so will help to streamline the calculation process.
- 8.13 The assessment of the potential supply of affordable housing set out in section 5 above indicates that the need can effectively be met by application of the requirements for Policy DM24. In addition the Bucks Districts and Bucks Thames Valley LEP Memorandum of Understanding⁶⁵ agreed that the level of affordable housing expected to be secured as part of the overall unmet housing need should contribute to meeting the relevant affordable housing needs of Wycombe and Chiltern and South Bucks, and 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

⁶⁵ July 2017 MoU

Vale District. As such there is no justification for a “policy on” uplift to the housing target to address the affordable housing need.

Older Persons Accommodation - C2 Housing

- 8.14 The HEDNA 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 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 accommodation of 590 bedspaces, the HELAA identifies that we currently have committed schemes which will deliver 565 bedspaces (of which 263 bedspaces are already completed or under construction).
- 8.15 As such the demand and supply for C2 elderly person accommodation is quite close. The Plan makes no specific allocations to meet this need and so we are relying on what is already in the pipeline. Whilst it is not counted within our supply C2 is another important part of meeting the demand for accommodation in Wycombe District. There has been an increase in the development of care homes, with varying levels of care available on site. People in institutional accommodation are not assessed in the housing OAN calculation and hence C2 provision is not counted in the housing land supply.

9.0 Other Needs of Different Groups in the Community

- 9.1 Paragraph 50 of the NPPF identifies that local planning authorities should plan for households with specific needs so that there is a wide choice of high quality homes, which widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).

- 9.2 Figure 124 of the HEDNA Update sets out the mix of market and affordable housing need by dwelling type and size for the district. For market housing it identifies the greatest need is for 3 bedroom houses and the lowest need for 1 bedroom flats. For Affordable housing the greatest need is also for 3 bedroom houses, with the least need for 4 bedroom houses.
- 9.3 Policy DM22 'Housing Mix' of the Local Plan identifies all residential development is required to include a mix of dwelling size, type and tenure taking account of current evidence in relation to priority housing need in the District, and in order to support a sense of place and mixed communities.
- 9.4 In addition to DM22 the Council has a Planning Obligations SPD which sets out more detailed requirements including dwelling and tenure mix for affordable housing. Other SPDs will be used where necessary to provide more detailed guidance on other types/forms of housing for particular groups.

People with Disabilities

- 9.5 The PPG identifies at paragraph 56-007:

'Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and / or M4(3) (wheelchair user dwellings), of the Building Regulations.

To assist local planning authorities in appraising this data the Government has produced a summary data sheet. This sets out in one place useful data and sources of further information which planning authorities can draw from to inform their assessments. It will reduce the time needed for undertaking the assessment and thereby avoid replicating some elements of the work.'

- 9.6 The HEDNA identified the number of people aged 65 or over is projected to increase by around 53,000 persons, around three-quarters of the overall growth. This includes an extra 18,000 persons aged 85 or over, around a quarter of the total increase. Most of these older people will already live in the area and many will not move from their current homes; but those that do

move home are likely to need accessible housing. Given this context, the evidence supports the need for all dwellings to meet Category 2 requirements, providing that this does not compromise viability.

- 9.7 The CLG guide to available disability data (referenced by PPG) shows that currently around 1-in-30 households in England (3.3%) have at least one wheelchair user, although the rate is notably higher for households living in affordable housing (7.1%). It is also important to recognise that these proportions are likely to increase over the period to 2033 in the context of the larger numbers of older people projected to be living in the area. The evidence therefore supports the need for 10% of market housing and 15% of affordable housing to meet Category 3 requirements. This recognises the changing demographics of the area and also provides an element of choice for households that need wheelchair user dwellings now as well as those households considering how their needs may change in future.
- 9.8 These requirements are supported through DM41 'Optional Technical Standards for Buildings Regulation Approval'. All new dwellings are required to achieve the standards in Building Regulations Approved Document M4(2). All developments which are required to provide on-site affordable housing in accordance with DM23 will also be required to provide 30% of any affordable homes, and 20% of any market homes, in accordance with the dwelling standards in Building Regulations Approved Document M4(3).

Self-build and custom build requirements

- 9.9 Paragraph 50 of the NPPF identifies that local planning authorities should plan for people wishing to build their own homes. PPG⁶⁶ states the Government wants to enable more people to build their own home and wants to make this form of housing a mainstream housing option. There is strong industry evidence of significant demand for such housing, as supported by successive surveys. Local planning authorities should, therefore, plan to meet the strong latent demand for such housing.

⁶⁶ Planning Practice Guidance (March 2014), ID 2a-021

- 9.10 In May 2012 a Self-Build Portal run by the National Custom and Self Build Association (NCaSBA) was launched. It shows the current registrations from groups and individuals looking for land in the HMA on the 'Need-a-Plot' section of the portal. There is clearly some interest in self-build across the area (around ten groups or individuals in October 2015), this represents only a very limited number of people and an exceptionally small proportion of the overall housing need identified each year. In April 2016 Council started its own log of self-build and custom build interest. As of October 2017 194 people have registered a self-build or custom build interest.
- 9.11 Policy DM22 'Housing Mix' identifies where development is 100 or more dwellings, 5% of the proposed dwelling numbers should be self-build plots. In addition to the criteria based policy, there are a few allocated sites which exceed 100 dwellings. Policy PR7 also requires the provision of self-build and custom build plots as part of major expansion of princes Risborough. The Council owns part of the Gomm Valley reserve site (Ashwells) and is considering the provision of self-build plots on that site.
- 9.12 Table 7 of the Plan (page 50) indicates 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.
- 9.13 In terms of service families the HEDNA identifies that the need represents less than 0.5% of the population aged 16 or over, therefore service families are relatively small in number in the district. The needs of these families are already included within the overall level of housing need.
- 9.14 Please see Topic Paper 10: Meeting the Needs of Travellers for details on traveller provision.

10.0 Conclusion

- 10.1 There has been close cooperation under the Duty to Co-operate to define the HMA and the extent of housing need in the HEDNA, which concludes the OAN for Wycombe district to be 13,200 dwellings. This has led to common approaches and joint studies, in particular the HMA, HEDNA and Part 1 Green Belt Review. The close cooperation and joint working has led to a critical review of the housing supply.
- 10.2 WDC have carefully tested all housing supply options, which has resulted in a housing supply of 10,927 dwellings. The Sustainability Appraisal also explains this. This process has resulted in a significant expansion to Princes Risborough which is the largest proposed development within the HMA. It has also included a Green Belt Assessment and AONB Assessment, which has demonstrated there are exceptional circumstances for releasing a limited number of Green Belt sites. Exceptional circumstances have not been identified for major development within the AONB, however a number of 'non-major' greenfield sites have been identified. A number of other smaller PDL sites have been identified, in our main towns and villages including poorly performing employment sites that have been released for housing use. Villages beyond the AONB and Green Belt have also been considered and this has resulted in a broad location identified for Kimble and allocation for Longwick in the Longwick-cum-Ilmer neighbourhood plan. This has resulted in the distribution of housing supply as set out in policy CP4.
- 10.3 The findings of the HELAA show we cannot meet our OAN without adverse impacts significantly and demonstrably outweighing the benefits or being contrary to NPPF paragraph 14 'footnote 9' constraints.
- 10.4 We have reviewed our position to see if we could find further housing supply, in line with the PPG guidance. The review process resulted in a significant reduction to the initial unmet housing need, this was further reduced with the HEDNA update slightly reducing the housing need.

- 10.5 Aylesbury Vale district council have agreed to take an unmet housing need of 2,275 dwellings. The local plan target is 10,925 as set out in policy CP4 – ‘Delivering Homes’. The housing target and the agreement of Aylesbury to take the unmet housing need of 2,275 shows how the OAN has been planned for in accordance with paragraph 47 of the NPPF. No authority is asking WDC to take unmet needs from within or outside the HMA.
- 10.6 All identified deliverable or developable housing sites in the HELAA are allocated in the Local Plan. The supply identified is deliverable/developable and meets the housing target in full to the end of the plan period. The housing trajectory shows a consistent supply of sites throughout the plan period and demonstrates an excess of supply for the 5 year housing land supply. The plan plans for a mix of types, both market and affordable, specialist housing needs and self-build.
- 10.7 The new methodology currently being consulted on by Government for calculating OAN has not been considered as part of the HEDNA. The consultation paper at present provides transitional provision whereby plans submitted by 31st March 2018 should continue to be examined and rely on existing OAN methodology.