



**GL Hearn**

Part of Capita Real Estate

# Review of Housing Capacity in New Wycombe Local Plan Consultation Draft

**On behalf of Aylesbury Vale District Council**

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## **Prepared by**

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## 1 INTRODUCTION

- 1.1 Wycombe District Council published the draft Wycombe District Local Plan for consultation in June 2016. Aylesbury Vale District Council has commissioned GL Hearn to review the Draft Wycombe Local Plan and consider in particular the provision for housing made within this. The focus of this review has thus been to examine the housing supply with a view to acting as a ‘critical friend.’
- 1.2 The core purpose of this report is thus to critically review the proposed housing provision in the draft Wycombe District Local Plan and to identify whether there is additional potential housing capacity that could be considered for development over the plan period to 2033.
- 1.3 The report thus reviews the New Wycombe Local Plan Consultation Draft (June 2016) and its evidence base. The following list of documents have been considered as part of the review:
- Wycombe DC Local Plan Consultation Draft
  - Sustainability Appraisal
  - Housing and Economic Land Availability Assessment (HELAA)
  - Strategic Site assessment study
  - Green Belt Review
  - Area of Outstanding Natural Beauty Site Assessment
  - Princes Risborough Town Plan - Draft Document
  - Authority Monitoring Reports.

## 2 NATIONAL POLICY

- 2.1 The NPPF sets out a presumption in favour of sustainable development. For plan-making this means that local authorities should positively seek to meet development needs of their areas. Paragraph 14 sets out that the local plans should meet the objectively assessed housing need, with sufficient flexibility to adapt to rapid change unless the 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.
- 2.2 The Framework in effect sets out that local authorities should meet their own development needs where it is sustainable to do so. There are however strategic constraints to development in Wycombe District – with 71% of the District’s land area falling within the Chilterns Area of Outstanding Natural Beauty (AONB) and 48% in the Metropolitan Green Belt.
- 2.3 The NPPF outlines that great weight should be given to conserving landscape and scenic beauty within AONBs; and that planning permission should be refused for major developments in designated areas such as this except in ‘exceptional circumstances’ and where it can be demonstrated that doing so is in the public interest.

- 2.4 Green Belts are a policy tool to control the location of development. The NPPF emphasises their permanence and outlines that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the local plan. The Framework is clear in the context of reviewing Green Belt boundaries that there is a need to balance difference factors – including channelling development towards urban areas inside Green Belt boundaries; to towns and villages inset within the Green Belt; and to locations beyond the Green Belt boundary.

### **3 WYCOMBE LOCAL PLAN CONSULTATION DRAFT REVIEW**

- 3.1 The Wycombe Local Plan Consultation Draft (June 2016) is the second document which Wycombe District Council (WDC) has consulted. It follows an Options consultation held in spring 2014. After reviewing the responses the council will prepare a submission draft of the Plan that will be consulted on in early 2017, before the Plan's submission to the Planning Inspectorate around spring 2017.
- 3.2 The Buckinghamshire HEDNA has established an objectively assessed need for 50,000 homes across the County between 2013 and 2033, of which 15,011 homes are needed in Wycombe District (751 dwellings per annum). The plan proposes a housing target for 10,000 homes (500dpa) over this period (Policy CP4), the difference between this and the need being an unmet need for 5,000 homes.
- 3.3 To set the proposed housing target in context, the level of housing being planned for is marginally above historic rates of delivery. Between 2006 and 2015, net completions totalled 4,148 dwellings<sup>1</sup> which is equivalent to 460 dwellings per annum (dpa). Housing delivery has exceeded the Core Strategy target of 402.5 dpa.
- 3.4 The Plan's Spatial Strategy (CP2) seeks to protect the Area of Outstanding Natural Beauty and Green belt by allocating the vast majority of development on land outside of these designations and only allocating sites within them which perform weak Green Belt functions and that have limited visual impact on the AONB. The broad distribution of housing provision expected (Policy CP4) is shown in Table 1.
- 3.5 90% of the homes accommodated in the District are within the High Wycombe area (including the surrounding villages such as Hazelmere), Princes Risborough, Marlow and Bourne End and Wooburn. Plans for the significant expansion of Princes Risborough to take approximately 2,500 homes are set out in a separate document, the draft Princes Risborough Town Plan.

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<sup>1</sup> Dec 2015 AMR, Table 3.1 excluding C2 completions of 186 units 2013-15

**Table 1: Proposed Distribution of Housing Provision (Policy CP4)**

Area	Housing Provision	%
High Wycombe	5,250	53%
Princes Risborough	2,600	26%
Marlow	300	3%
Bourne End and Wooburn	750	8%
Rural Areas	1,100	11%
<b>Total</b>	<b>10,000</b>	<b>100%</b>

Source: *New Wycombe District Local Plan, Consultation Draft, Policy CP4.3, p28*

3.6 AONB and Green Belt have not been treated as absolute constraints, with the Draft Plan outlining that some sites have been selected in the AONB which have the least impact and are less likely to comprise major development; and sites identified which perform weakly against Green Belt purposes.

3.7 Table 2 in the Plan outlines the various components of supply from which the above numbers are drawn. **It is notable that these are “broad brush” figures.** A split between the planning status of sites, which we would have expected, is not provided.

**Table 2: Housing Land Supply Position (Table 2)**

	Capacity (Dwellings)
Completions 2013-15	700
Previously-Developed Sites	3,900
Reserve Sites (High Wycombe)	1,500
Princes Risborough Urban Extension	2,200
Green Belt Review	900
Other Greenfield	300
Windfall (Previously Developed)	500
<b>Total</b>	<b>10,000</b>

Source: *New Wycombe District Local Plan, Consultation Draft, Table 2, p31*

3.8 Paragraphs 4.26- 4.39 present the justification for the proposed Housing Policy CP4. In particular, paragraph 4.27 states that:

*“The starting point in Government policy is for authorities to meet their objectively assessed need (for housing and other development) unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of doing so, or specific national policies restrict development such as the Green Belt, Areas of Outstanding Natural Beauty or areas at risk of flooding. Where an authority cannot meet its objectively assessed need within its own area, under the Duty to Cooperate, then it can seek neighbouring authorities to help meet those unmet needs, starting with authorities that are within the defined Housing Market Area, provided this is consistent with achieving sustainable development.”*

3.9 The Draft Plan outlines that WDC has thoroughly reviewed the scope for meeting its housing needs within the District, including:

- Assessing the scope for development on previously developed (“brownfield”) sites (in urban and rural areas), including on former employment land where appropriate;
- Considering the development potential of the former reserve sites;
- Assessing the scope for major expansion of Princes Risborough beyond the Green Belt and Area of Outstanding Natural Beauty;
- Reviewing the scope for removing areas of land from the Green Belt where it would not be significantly harmful to the purposes of the Green Belt;
- Identifying the scope for development in the larger villages outside of the Green Belt but in the Area of Outstanding Natural Beauty.”

- 3.10 However **there are a significant number of areas within the plan, and its associated evidence base, where there is uncertainty about potential supply assumptions**, and a range used to identify the potential supply from individual development sites.
- 3.11 Once individual site capacities are aggregated, the potential error margins are compounded and result in notable uncertainty regarding the District’s development potential. **Against a context of a constrained overall land supply, a more thorough assessment of site capacities is needed.**
- 3.12 Moreover it is not clear to what extent the constrained land supply has influenced the interrogation of development capacity. The PPG clearly outlines that plan makers need to revisit the assessment of capacity where there is an unmet housing need, “*for example changing the assumptions on the development potential on particular sites (including physical and policy constraints) or including sites for possible new settlements.*”<sup>2</sup> It outlines that following this review, if 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 cooperate*”.
- 3.13 **It is clear from the PPG that a rigorous assessment of land availability is intended to be undertaken – including interrogating density assumptions and whether sites can yield additional potential – before an unmet need is defined.** GL Hearn’s interrogation of the supply position suggests that density assumptions are often on the more cautious side of the range of possibilities: in contrast to what we often see on the ground in more constrained areas.
- 3.14 It is notable in this instance, as stated in paragraphs 4.30 and 4.31 of the Draft Plan, that WDC will seek to update and review their Housing Land Supply Position over summer 2016. It will be important to ensure that this exercise is rigorous, leaving no stone unturned in seeking to identify additional development potential in Wycombe District.
- 3.15 There is some risk that WDC is prejudging this issue, and it is notable that there are extensive references in WDC’s Draft Local Plan to an unmet need of 5,000 dwellings being met through the Duty to Cooperate in Aylesbury Vale (see Appendix A).

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<sup>2</sup> Reference ID: 3-026-20140306

## Sustainability Appraisal

- 3.16 The Sustainability Appraisal (SA) published in August 2016 considers both options for the quantum of development within the District and for its distribution, including broad locations and by site assessment.
- 3.17 The SA indicates that five strategic options for the level of housing provision were assessed, these being:
- Option A: 9,600 – 10,000 homes
  - Option B: 10,900 homes
  - Option C: 12,200 homes
  - Option D: 14,300 homes
  - Option E: 15,100 homes
  - Option F: 22,100 homes.
- 3.18 There is ultimately little clear justification presented in the SA as to why the Council could not deliver a level of housing above the lowest of the five options considered. The SA sets out that this would require higher levels of greenfield land, and that higher provision could have “adverse impacts on biodiversity and geodiversity sites, the landscape including potentially nationally designated landscapes (i.e. the AONB) and heritage features such as conservation areas and listed buildings.” It also outlines that higher development levels will lead to increased traffic and associated congestion, impact on emissions and place a greater burden on transport infrastructure. This is set out for each of Options B – F. Set against this higher housing provision would support the economy, growth in labour supply and improve affordability.
- 3.19 Considering the colour coding of indicators, Option A presents fewer negative impacts but all the rest present more positives. It is not clear through the justification why Options B, C, D and E have been excluded.
- 3.20 Critically much of the justification presented is generic – and could equally apply to delivering higher levels of housing provision within Aylesbury Vale. **The SA does not provide a specific and evidence-based rationale as to why higher levels of provision than in Option A could not be accommodated.**
- 3.21 Turning to look at the strategic spatial options which are considered in the SA, it is notable in particular that one option considers “major expansion on the transport network” and considers the potential for growth at Kimble, Saunderton and Stokenchurch. Of particular note, in respect of this option is that there is **land available at Little Kimble, siting close to the rail station which is outside of the AONB.** The potential for additional development in this area needs to be assessed independently of that at other growth locations.

- 3.22 Little Kimble is categorised as a Tier 5 settlement, but has a rail station (as well as a good bus service) and thus sustainable travel options connecting it to a range of employment destinations, including Aylesbury, Princes Risborough and High Wycombe. It is relatively close to Princes Risborough, which would provide local services. Moreover East/West Rail can be expected to improve rail services to the settlement. There is potential for growth of the settlement (which clearly would need to be sensitively designed to mitigate impacts) to the west and north on land which is outside of the AONB and Green Belt. **The potential for additional development at this location clearly warrants further consideration.**
- 3.23 The SA additionally considers the potential for delivering a new settlement. The potential for this in the Terrick/ Ellesborough area is considered. Given the closeness of the area considered to Aylesbury, and the AONB designation, we would agree that this is unlikely to be a realistic option.
- 3.24 Ultimately the justification within the SA for the selection of the lowest of the growth options considered, and its rejection of the higher option on the balance of merits, is not clear and as it currently stands does not appear to be clearly justified. National policy identifies meeting housing need as a consideration of particular importance, and GL Hearn recognises that it also provides strong support against development within AONB and emphasises the permanence of Green Belt boundaries, it seems that further testing of development options including in particular the potential for higher development densities and for development outside of the AONB at Little Kimble, warrants further consideration.

#### **4 REVIEWING CAPACITY BY AREA**

- 4.1 Proposed housing allocations are set out in Section 5 of Wycombe's Draft Plan. These are presented on an area-by-area basis, and we have followed this approach in reviewing the capacity of these sites/ areas, cross-referencing the content of the Plan with the HELAA.

##### **High Wycombe**

- 4.2 The Draft Plan proposes 5,250 residential units in Wycombe on the town 'contributing its fair share' towards tackling the national need for new homes. This would represent delivery of an average of 263 dpa which is **almost 25% below the rate of development seen in High Wycombe over the last decade.**
- 4.3 30 housing-led allocations are proposed that can indicatively provide 2,000-2,600 new homes. This includes five reserve sites (identified in the 2008 Core Strategy).

- 4.4 Two of those 30 sites<sup>3</sup> have no indicative capacities currently and it is unclear whether these have been included within the capacity assessment. According to the plan (para 5.1.4.4.) updated capacities will be published in the new AMR.
- 4.5 Net completions of 493 dwellings were recorded in High Wycombe between 2013 and 2015. The HELAA identifies sites that are deliverable or developable. It identifies 68 such sites in High Wycombe which are deliverable and a further 36 sites which are developable. In total the 104 sites yield 4,744 dwellings over the plan period. This includes sites with and without planning permission, including the reserve sites.
- 4.6 Across the reserve sites with a total area of 131.7ha (in High Wycombe), the Draft suggests a provision of 1,300-1,700 new homes with an average density ratio of 11 dph. Even assuming that 50% of the land area is not developable, the density is still relatively modest, around 22 dph. Notionally if the density on 50% of the land area was increased to an average of 30dph it could yield 400-800 additional units through development of the reserved sites<sup>4</sup> in High Wycombe. Indicatively the density assumed for instance for HW4 Abbey Barn North, whilst recognising constraints including the safeguarded rail line, landscape/visual impact and topography, at < 10 dph looks exceptionally low.
- 4.7 Apart from the reserve sites, densities across other housing allocations/ supply should also be reviewed. This is considered further in the next section (see paragraphs 5.2 - 5.4).
- 4.8 GL Hearn considers however that there are some additional sites which could potentially yield additional housing provision. In particular,
- There were 11 sites adjacent to High Wycombe within the Green Belt. From these:
    - three sites have been released and constitute part of the housing allocations<sup>5</sup>;
    - one site<sup>6</sup> (8 ha) according to GB Assessment part II requires further consideration, thus it is currently consulted for release. This site is presented as housing allocation (HW12) but no capacity has been added in the proposed figure. If the site will come forward it can provide 250 new homes (on a moderate density of 30dph)
    - two sites<sup>7</sup> (3.5ha) are part of GB release proposal in the Draft however they have either been allocated for employment land or there is not currently any related allocation to these sites. If these sites come forward for housing they can provide approx. 100 new units (30dph)
    - five sites<sup>8</sup>, all developer promoted, were suggested for green belt release, however none came forward after the Part II Assessment. If these sites are released they can provide 350 additional homes.
  - 48 sites all listed in the final subsection of HELAA Table 15 (with a total area of 11.73 ha) that can be developed in High Wycombe have been excluded because of the lack of information

3 Land to the rear of Hughenden Road; and Former Bassetsbury Allotments

4 SHW004 (part of HW6), SHW0283 (HW7), SHW0428 (HW4), SHW0429 (part of HW5), SWC0067(part of HW6) (HELAA Table 11-12)

5 SHW0633 (HW10), SHZ0035 (part of HW8), SHW0462 (part of HW11)

6 SHZ0030 (HELAA Table 15)

7 SHW0559 and SHW0529 (HELAA Table 15)

8 SWE0005, SHZ0041, SWC0077, SWC0085, SWC0051 (HELAA Table 15)

particularly with regards to the deliverability of the sites. These sites should be reconsidered through further detailed assessment. They could provide around 350 new homes (at an indicative 30 dph density).

- 5 sites which previously had planning permission<sup>9</sup>, with a total capacity for 35 residential units, have been excluded as the council contacted the owners/developers and there was no raised interest for the sites' development currently. Whilst these could not be regarded as available now, they could become available for development in the medium-term. This is an area which may warrant reconsideration.

- 4.9 Combined these additional sources of supply (paragraph 4.8) could yield up to 1,085 additional units in High Wycombe, over and above the currently assessed land supply.
- 4.10 The HELAA Study also identifies a list of 11 sites for 'further assessment' (Appendix 7, Table 17). This warrants investigation; and should the six sites therein which fall outside of the AONB be brought forward for development, this would increase supply by up to 100 dwellings.
- 4.11 **Overall, without increasing the density assumptions on already proposed sites other than the reserved ones, GL Hearn considers that High Wycombe could potentially support further development potential for up to 1,585- 1,985 dwellings, subject to further investigation.** The potential supply from increasing development densities is considered further in the next section. It will evidently be important to further review the potential of sites identified "for further assessment" and capacity of those which is not defined in the plan.

## Marlow

- 4.12 The Draft Plan proposes provision of 300 homes in Marlow with the town 'contributing its fair share' towards tackling the national need for new homes, whilst protecting the AONB and Green Belt. Completions of 64 dwellings were recorded between 2013-15. The plan proposes 3 housing or mixed uses sites totalling 2.86 ha to provide 25-27 dwellings. In addition the Council consults on the release of green belt of land at the north end of Oak Tree Pond. This area comprises 9 ha of land with potential for 200 – 250 dwellings. The key issues related to the release of this land, namely the importance of preventing Marlow sprawl and merging with Marlow Bottom, the scale of the potential development to an AONB and the supporting infrastructure requirements will be considered after the consultation of the Draft.
- 4.13 Marlow is evidently relatively constrained, by a combination of the River Thames floodplain to the south/south-west, the AONB to the west and north, and Green Belt. However there are some areas of land which fall within Green Belt but are not within the AONB. These are identified as unsuitable for development in the Part I Green Belt Study and have not been further considered. However this

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<sup>9</sup> SHW0494, SHW0574, SHW0576, SHW0592, SHW0631 (HELAA Table 14)

approach is inconsistent with that adopted in other areas such as High Wycombe, where the potential of smaller parcels has been considered, including developer-promoted and so-called 'sense check' sites. Such potential sites should be reviewed.

- 4.14 **GL Hearn considers that Marlow could support further development potential for 50+ dwellings, including through reviewing development densities and smaller green belt parcels, subject to further investigation.**

### Princes Risborough

- 4.15 Plans for Princes Risborough are being developed alongside the draft Local Plan through the preparation of a Princes Risborough Town Plan. The Draft Local Plan proposes provision of 2,600 dwellings over the plan period. Net completions between 2013 and 2015 totalled 12 dwellings.
- 4.16 The Draft Consultation Document of this, dated February 2016, proposes an urban extension of 2,000-2,600 homes on land to the west of the town. Work is ongoing to consider the route of the relief road which is intended to serve this scheme. The urban extension is set to be delivered between Years 6-18 of the plan, at a rate of 200 dpa through involvement of 3-4 developers.
- 4.17 The Draft Plan also seeks feedback with regards to the release from green belt of the land at Culverton Farm and to the Rear of Poppy Road<sup>10</sup>, as a result of seeking alternatives for the relief/new road of the urban extension heading south towards Shootacre Lane. GL Hearn estimates that this site could provide additional capacity for an estimated 150 – 200+ dwellings.
- 4.18 Set against the context of an unmet housing need, a strategic question would be whether a larger urban extension at this location could be accommodated and delivered in the plan period. With the potential for development of 4 developers, a higher level of housing provision could be delivered within the plan period; and it appears that there is physical capacity for a larger site to be accommodated on the western side of the town and/or for development densities to be increased. Whilst Princes Risborough is a relatively small settlement, with a population of 8,000, GL Hearn would note that it is relatively accessible, with rail connections to High Wycombe, Aylesbury, Oxford, London and further afield. It has some similarities to locations such as Haddenham and Winslow which AVDC is considering for strategic growth. Whilst recognising the potential impact of development on the road network, and on the AONB, it would seem appropriate in the context of an unmet housing need to assess whether further development could be sustainably accommodated.
- 4.19 **GL Hearn considers that Princes Risborough could accommodate and deliver up potentially 150 - 200+ dwellings within the plan period, without requiring development within the Green**

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<sup>10</sup> Referred to in HELAA as SPR0036, SPR0082. The south part of the area is not identified in HELAA

**Belt and AONB, subject to further investigation. As well as potentially a larger urban extension.**

### Bourne End and Wooburn

- 4.20 The Plan identifies the potential for 750 homes at Bourne End and Woburn. The settlements lie largely beyond the AONB, but are surrounded by Green Belt. The Draft Plan proposes five housing-led allocations in this area, totalling 44.17 ha, with capacity for between 580 – 760 dwellings. This implies a relatively low gross density of 13 – 17 dwellings per hectare (dph). Whilst accepting that schemes are identified for housing-led mixed use, and the need for open space and green infrastructure it does seem to GL Hearn that consideration should be given to the potential to achieve a higher residential yield.
- 4.21 **GL Hearn consider that Bourne End and Woburn could yield some additional potential through increasing development densities.**

### Rural Areas

- 4.22 The Draft Plan admirably aims to respect and cherish the Chiltern Hills AONB. The majority of small settlements and villages, but not all of them, lie within the Area of Outstanding Natural Beauty. The plan proposes allocations within settlements which have a range of existing facilities. Only settlements in Tiers 3 and 4 in the Settlement Hierarchy have been considered for future allocations. This comprises “higher order service villages” and “other service villages.”
- 4.23 The principles for rural areas set out in the plan set out that new homes are expected to be brought forward through opportunities identified in the local plan, in neighbourhood plans and through rural exception site development. Overall the rural areas are expected to deliver 1,100 homes. 106 net completions were recorded between 2013 and 2015.
- 4.24 The Draft Plan proposes 13 site allocations across four settlements, which are expected to yield 560 – 660 dwellings. In particular:
- In Lane End, four sites totalling 3ha are proposed to provide 70-90 new homes. In addition, it is proposed to remove a further site adjoining the M40 (Land adjoining Sidney House) from the Green Belt, but given access difficulties and associated noise, residential development is not proposed.
  - In Longwick, located to the north of Princes Risborough and beyond the AONB and Green Belt, three sites have been identified as draft allocations, informed by the emerging Neighbourhood Plan. The capacity of these three sites is 77 dwellings. In addition, a 160 home scheme has been recently granted planning permission at appeal (Land off Barn Road) and a small additional piece of land is identified as having development potential (RUR8). The Plan also asks whether the RUR8 proposed allocation should be extended in light of the appeal decision (presumably to the rail line). We would thus estimate an additional potential capacity over and above the allocations of c. 210 dwellings.

- In Walters Ash and Naphill one housing allocation is proposed which is for development of 40-50 dwellings at Land off Clappins Lane, through release of this site from the Green Belt. In addition the plan moots further potential at RAF Walters Ash, which performs weakly against Green Belt purposes.
- In Stokenchurch one housing allocation is proposed, which falls within the AONB but not within Green Belt. This site, South of Mill Road, has an estimated capacity for 140-185 new homes together with green space is proposed.

4.25 In two of the above settlements, namely Lane End and Longwick, there are five sites that have been excluded from the potential supply and warrant further consideration. These comprise:

*Lane End*

- Land off Park Lane, east of Lane End which is currently within Green Belt. This site is adjacent to the settlement, 0.45 ha in size, and can indicatively provide 15 additional homes.
- Land south of Park Lane, Lane End. This is a 4.38ha Green Belt site adjacent to Lane End's eastern edge. It could indicatively add 130 new homes to the housing supply.
- Land off Simmons Way, Lane End. This is south of the above site, adjacent to the south east edge of Lane End. It is within the Green Belt, but could approximately 300 additional homes.

*Longwick*

- Land north of Rose Farm in Longwick. This site is currently assessed in the HELAA as unsuitable because of inadequate transport provision and the lack of accessibility. The site is adjacent to the rear of the two houses on the Thame Road.
- The Old School House, Thame Road, Longwick. This site has granted permission for 5 homes but it has been excluded as the agent considered that the site is not coming forward. Whilst it may not be appropriate to include within the five year supply, this site nonetheless could offer development potential in the medium term.

4.26 GL Hearn recognise however that whilst there may be additional land available in/around Lane End and Longwick, the scale of development which the villages and their infrastructure can support is potentially limited.

4.27 **Overall within the rural areas, there is some potential for additional supply to come forward through neighbourhood planning and rural exception sites.**

## 5 ADDITIONAL POTENTIAL SOURCES OF RESIDENTIAL LAND SUPPLY

5.1 This report moves on next to assess whether there are additional sources of supply in Wycombe District which warrant closer assessment.

### Reviewing Development Densities

5.2 GL Hearn considers that further work needs to be undertaken to consider potential development densities, taking into account the unmet housing need.

5.3 Appendix B sets out a headline analysis, prepared by AVDC Officers, of the potential capacity which could be achieved through increasing development densities to 35 dph. This could in theory yield up to 4,000 additional homes. This serves to highlight the particular potential for higher densities to increase residential capacity. Planning Practice Guidance is clear that where there is an unmet need, density assumptions should be reviewed. This is entirely consistent for instance with the approach taken in other constrained authorities, including within London.

5.4 Whilst clearly there are site-specific circumstances which will influence the developable area, and thus the potential residential yield from individual sites, the analysis serves to highlight that a modest increase in densities could impact significantly in increasing capacity.

### Employment Land

5.5 WDC's evidence base indicates scope for further growth in office and warehousing jobs and floorspace, but a declining requirement for industrial space. The HEDNA forecasts a need for 10 ha of B1a/b land, and 10 ha B8 provision; set against an expected reduction in demand of 10 ha for B1c/B2 space. Local market intelligence from recent developments and local agents suggest there is need for modern industrial properties to maintain the strength of the local economy.

5.6 The Draft Plan and in particular Policy CP5 *Delivering Land for Businesses* aims to achieve this through allocating 31ha of additional employment land, designating and protecting key sites as well as introducing flexibility for supporting uses in employment areas. Strategically, the plan identifies a broad balance between supply and demand across the three main B-class use sectors; however the Draft Plan's evidence base identifies that there is an undersupply in terms of warehousing.

5.7 According to the Policy CP5 justification, meeting the need in this sector (B8 warehousing/distribution) requires large, flat and accessible sites. The topography of the District means that this land is simply not available close to the M40. It identifies that it is not possible to meet this need within Wycombe District in full, resulting in an unmet need for 6ha of warehousing land (B8).

- 5.8 It is however evident that the Council has reviewed their employment land supply, and Appendix 9 in the HELAA identifies in total 14.4 ha of employment land across 16 sites which the Council agreed to release for housing in September 2015.
- 5.9 HELAA however identifies nine sites totalling more than 40 ha which are identified as Employment Local Plan Options. Whilst some of these sites have been taken forward for allocation within the Local Plan, notably the Air Park site, it is unclear as to whether the potential for those not proposed for allocation have been reassessed, considering their potential for residential and/or mixed use development.

### Empty Homes

- 5.10 CLG's Planning Practice Guidance identifies empty homes as a potential source of residential supply. This is not a source of supply which appears to have been considered in the HELAA.
- 5.11 DCLG Live Table 6.15, which draws on Council Tax Records, identifies 1,375 vacant dwellings in the District (based on 2015 data) which equates to a vacancy rate of 3.1%. This is what we might consider typical. Within this there were 465 long-term vacant homes.
- 5.12 If the Council could demonstrate that it had a clear programme in place to bring empty properties back into use, it might be able to include a proportion of the long-term vacants within its supply calculations. However realistically the potential from this source is likely to be limited.

### Office to Residential Change of Use

- 5.13 Change of use from offices (B1a) to residential (C3) have been allowed by prior notification since May 2013. The new General Permitted Development Order, which came into force on the 15th April 2015, other prior notification applications have been allowed including Class O,Q,M,N and P to be used for the provision of housing.
- 5.14 According to the most recently published Wycombe AMR, the Council does not monitor the residential units provided through Change of Use unless Building Regulations have been received or the site is surveyed. However Prior Approvals are listed as a source of supply in the Five Year Housing Land Supply calculations (AMR, Page 63). This identifies 13 schemes that are expected to yield 180 dwellings as listed in HELAA Table 10.
- 5.15 There is clearly however **potential for changes of use from office to residential to yield additional supply beyond schemes which already have Prior Approval**. Some windfall allowance for future supply from this source might be appropriate.

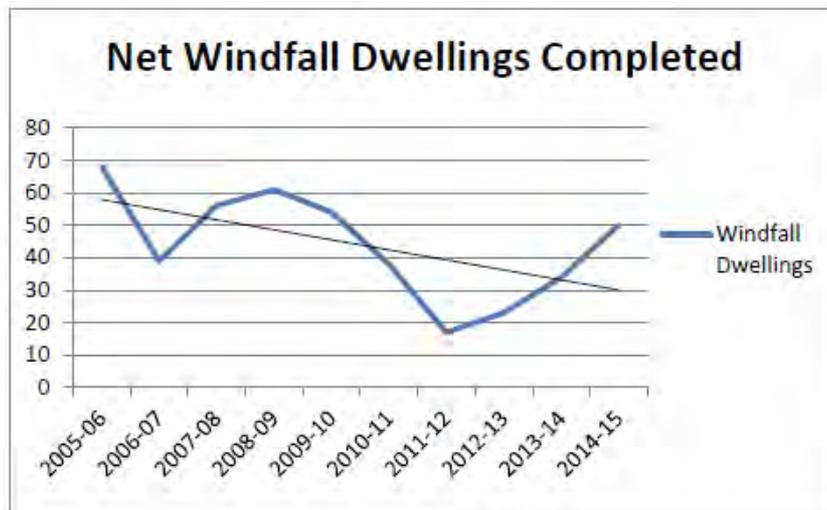
## Publically-Owned Land

- 5.16 A further potential source of supply is publically-owned land. There is limited available data on this. We note that the HELAA identifies the potential for residential redevelopment of the Kingsmead Depot, London Road, Loudwater, identifying potential for 50 dwellings.
- 5.17 However we would also note from HELAA that a new public sector hub is proposed within the Town Centre. We would expect that this might release other public-owned sites for redevelopment; and for instance note that **the Council Office Site at Queen Victoria Street (1.14 ha) is not included within the residential land supply. The potential of this site may warrant reconsideration and could yield 60-80 units.**

## Windfall Allowance

- 5.18 Table 2 of the Draft Plan (p 31) presents the current position on Housing Land Supply in the District. A windfall allowance is clearly appropriate within the five year housing land supply as HELAA does not consider sites with capacity for less than 5 units.
- 5.19 Stage 3 of the HELAA methodology identifies where there is realistic evidence on windfall delivery and that this can be considered as a consistent source of housing delivery.
- 5.20 Windfall provision for 500 dwellings is included. This would be equivalent to including provision for windfalls at a rate of c. 33 dpa from 2018 onwards.
- 5.21 Historic windfall rates are shown in the chart below. Average windfall development levels over the past 5 years have been of 33 dpa; whereas over a longer time frame, an average of 44 dpa is shown. The HELAA sets out that:
- “it is considered that the last 5 years of windfall completions are a realistic basis for projecting forward a future supply of small windfall sites. This is taking a cautious approach that windfall completions may not return to the higher trend in the boom period experience 5 to 10 years ago”*
- 5.22 This seems to GL Hearn to be clearly a cautious viewpoint. Windfall completions have fallen below this level in just 3 of the last 10 years, principally aligned with the housing market downturn. The ten years trend of 44 dwellings per annum should be reconsidered.

**Figure 2: Historic Provision of Windfalls**



Source: Wycombe District Draft HELAA 2016 – Appendix 11

5.23 **A higher windfall allowance, which GL Hearn considers would be justified, could yield an additional 150 dwellings.**

## 6 CONCLUSIONS

6.1 Fundamentally this review demonstrates that a more thorough and rigorous assessment of land availability should be progressed by Wycombe District Council, against a context of an unmet housing need. In doing so, GL Hearn would expect additional supply to be identified, which would reduce the level of unmet housing need albeit that it seems unlikely that WDC would be able to meet their OAN in full.

6.2 National practice guidance emphasises the need to iterate assessments of land supply, and further consider development potential as well as development densities for sites, where there is an unmet housing need. No stone should be left unturned.

6.3 At a strategic level, the review identifies the potential for additional supply from:

- Employment Land Option Sites
- Addressing Long-Term Vacant Homes
- Development of Publically-Owned Land
- Windfall Allowance based on 10 Year Trends

6.4 An assessment of the development potential by area yields a number of sites/ locations with potential to accommodate additional development. This includes:

- Additional potential sites identified in the Plan, which sit adjacent to existing urban areas, within Green Belt but within low performing parcels;
- Sites within the HELAA identified for “further assessment” or where a “lack of information” is identified from which to draw conclusions on developability/ deliverability;
- Enhanced potential for development beyond the Green Belt and AONB at Princes Risborough, as mooted within the Draft Plan;
- Additional capacity which could be accommodated through further interrogating the development potential, and particularly development densities, of individual sites.

6.5 GL Hearn’s headline analysis identifies additional development potential – subject to detailed investigation - for 2,800+ additional dwellings over and beyond that identified within the Plan, split by area as follows:

- High Wycombe – up to 1,985 additional dwellings (see paragraphs 4.2 – 4.11)
- Princes Risborough – 150-200+ additional dwellings, including through further urban expansion (para 4.15 - 4.19)
- Marlow –50+ additional dwellings (para 4.12-14)
- Bourne End and Wooburn – modest potential through increasing densities (para 4.20-21)
- Rural Areas – some additional dwelling provision (para 4.22-27)
- Little Kimble – expansion of the settlement should be investigated further (para 3.21-22)
- Windfalls – 150 additional dwellings (para 5.18-23)

6.6 In our experience, areas with constrained land supply and an unmet need can expect to have the land supply interrogated hard through a local plan examination, and it is strongly advisable that Wycombe DC progress a more detailed interrogation of land supply to inform the Submission Version of their Local Plan.

## APPENDICES

### APPENDIX A: References to unmet need and Aylesbury Vale DC in the Draft Local Plan

The following list includes all the references in the Local Plan Draft Consultation Document (June 2016) to accommodate the unmet need in Aylesbury Vale District Council.

- A.1. Introduction, page xii : *“Together we have worked out how many homes need to be built, and how many jobs will be created, and have agreed, in broad terms, how much of the development should go in each District, up to 2033. During this time, using the Government methodology, about 50,000 homes are needed in the County. About 15,000 of these are to meet the needs of Wycombe District. However, Wycombe has large areas in the Chilterns Area of Outstanding Natural Beauty and the Green Belt. We propose to accommodate 10,000 homes, with Aylesbury Vale accommodating the rest.”*
- A.2. Addressing the challenges, page 15: *“2.18 The National Planning Policy Framework sets the expectation that each Council meets its objectively assessed needs for development. However, it also recognises that this will not be possible everywhere without causing harmful adverse impacts, especially where large areas fall within Areas of Outstanding Natural Beauty and the Green Belt. For Wycombe, to meet all our development needs would cause unacceptable harm to the Green Belt and the Area of Outstanding Natural Beauty. We are therefore discussing with Aylesbury Vale District Council if it can accommodate our unmet need, to ensure that development remains sustainable.”*
- A.3. The Spatial Strategy, page 21, Policy CP2 – Spatial Strategy: *“1. The Council will, through the allocations and policies in this plan: a) Deliver broadly 2/3 of the District’s housing need within the District, and work with Aylesbury Vale District Council through the Duty to Cooperate to accommodate unmet need;”*
- A.4. Page 23: *“4.8 Because of the Area of Outstanding Natural Beauty and Green Belt, Wycombe District cannot accommodate its full housing need whilst delivering sustainable development. Under the Duty to Co-operate we have been working with the other authorities in the Housing Market Area. Aylesbury Vale has agreed in principle to take Wycombe District’s unmet need. This is expanded further under CP4 below.”*
- A.5. Page 24: *“4.14 This strategy for delivering sustainable development has taken into account that not all the District’s housing need can be accommodated in the District. Rather than cause harm to the Area of Outstanding Natural Beauty and require further land to be removed from Green Belt, a more sustainable option is for the remaining housing to be located in Aylesbury Vale. Aylesbury Vale District Council is consulting on its draft plan on the most sustainable options to location development within their District.”*
- A.6. Page 28 – Delivering Homes: *“POLICY CP4 – DELIVERING HOMES The Council will provide for: 1. a housing target of broadly 10,000 homes for the District for the plan period 2013-2033 , 2. the unmet element of the District’s housing need (around 5,000 homes ) to be met in Aylesbury Vale District;”*

- A.7. Page 31: *“4.32 This means that the authority is not able to meet its full objectively assessed need for housing. In line with the NPPF, the Council has been in discussion with the other Buckinghamshire Districts on accommodating housing needs across the Housing Market Area. There is an in principle agreement that Aylesbury Vale will accommodate that unmet need but further work is ongoing across the authorities to firm up how much each authority can accommodate and the ability of Aylesbury Vale District to accommodate it. The latest position is to be set out in a Position Statement which is due to be published shortly.”*
- A.8. Page 31: *“4.33 As such, the figures set out in this draft plan are a “work in progress” position, but provide an indication of the scale of the housing requirement for Wycombe District. At present the indications are that Aylesbury Vale District would accommodate around 5,000 homes from Wycombe District’s need, with a housing requirement for Wycombe District of 10,000 homes. This would be an annual requirement of around 500 homes per year – a significant increase in the level of housing provision for the District compared with plans over the last 20 years. As some of the overall housing need would be accommodated by Aylesbury Vale it is anticipated that some of the affordable housing need would also be met by Aylesbury Vale also.”*
- A.9. Page 38: *“4.46 The discussions we are having with the other authorities in our functional economic market area under the duty to co-operate may result in some of the floorspace demand being met by Aylesbury Vale District to complement some of the unmet housing need which they will be planning to accommodate. This will ensure more balanced growth and would take advantage of the wider opportunities for employment land provision in Aylesbury Vale. There is broad agreement in place for such a re-distribution to take place.”*

**APPENDIX B: Indicative Assessment of Potential Yield from Higher Density Development**

Site	ha	Lower capacity	higher capacity	density of higher range	capacity at 35dph
<b>High Wycombe</b>					
Abbey Barn North	11	60	90	8.2	385.0
Abbey Barn South and Wycombe	33	440	550	16.7	1155.0
Gomm Valley and Ashwells	74	480	640	8.6	2590.0
Terriers Farm and Terriers House	30	380	540	18.0	1050.0
Land off Amersham Road,	19	240	320	16.8	665.0
Land to the rear of Hughenden	2.5	?	?		87.5
Glynswood, Green Hill	2.2	36	50	22.7	77.0
Horns Lane, Booker	1.78	36	50	28.1	62.3
Leigh Street	1.8	54	54	30.0	63.0
Former Bassetsbury Allotments	2.86	?	?		100.1
					0.0
Longland Way / Pettifer Way (North)	3.32	45		13.6	116.2
Garages between Chiltern Avenue	0.38	10		26.3	13.3
Garages at Havenfield Road	0.03	5		166.7	1.1
1-9 Shaftesbury Street	0.03	9		300.0	1.1
7-8 High Street	0.06	5		83.3	2.1
Dashwood Avenue	0.89	25		28.1	31.2
34 Dashwood Avenue	0.02	5		250.0	0.7
Longland Way / Pettifer Way (South)	0.55	8		14.5	19.3
Garages at Tyzack Road	0.25	6		24.0	8.8
Land to the rear of Quebec Road	0.8	5		6.3	28.0
Kingsmead Depot, London Road	0.6	50		83.3	21.0
RailCo, Boundary Road, Loudwater	0.96	27		28.1	33.6
Notcutts Garden Centre, Clay Lane	0.91	15		16.5	31.9
Burrows House, Jubilee Road, Downley	0.36	25		69.4	12.6
46 West Wycombe road	0.08	14		175.0	2.8
Queensmead House, Queensmead Road,	0.41	25		61.0	14.4
Frank Hudson Furniture Factory, Rosebery	0.11	10		90.9	3.9
Ogilvie Road, High Wycombe	0.53	9		17.0	18.6
JC and MP Smith, Princes Gate	0.15	5		33.3	5.3
Netley Works, 89 Queens Road	0.08	11		137.5	2.8
	<b>188.66</b>	<b>2040</b>	<b>2608</b>	<b>13.8</b>	<b>6603.1</b>
<b>Marlow</b>					

Foxes Piece, Marlow	1.52	5		3.3	53.2
New Court / Liston Court	0.74	15		20.3	25.9
Seymour Court Road	0.3	5	7	16.7	10.5
	<b>2.56</b>	<b>25</b>	<b>27</b>	<b>10.5</b>	<b>89.6</b>
<b>Bourne End and Wooburn</b>					
Slate Meadow	10	150	190	15.0	350.0
Hollands Farm	31	355	500	11.5	1085.0
Land off Northern Heights	2.84	40		14.1	99.4
Windrush House	0.15	12		80.0	5.3
Lincoln House	0.18	20		111.1	6.3
	<b>44.17</b>	<b>577</b>	<b>762</b>	<b>17.3</b>	<b>1545.95</b>
<b>Rural Areas</b>					
Land at Clappins Lane, Naphill	2.24	40	50	17.9	78.4
Land south of Finings Road , Lane End	0.86	23	32	26.7	30.1
Land between Chalky Field and Marlow Road, Lane End	1.25	20	28	16.0	43.8
Land off Ellis Way, Lane End	0.64	10		15.6	22.4
Land off Simmons Way, Lane End	0.26	19		73.1	9.1
Land south of Mill Road, Stokenchurch	7	140	185	20.0	245.0
Land at Thame Road/ off Bar Lane, Longwick	5	?			175.0
Land off Thame Road, south of Chestnut Way Junction, Longwick	1.02	?			35.7
Uplands House Hotel, Four Ashes Road, Cryers Hill	7.6	50		6.6	266.0
Hughes Builders Merchants, Rear of 26-30 Whitepit Lane, Flackwell Heath	0.19	6		31.6	6.7
Bangalore House, Falcon Court, Wycombe Road, Stokenchurch	0.5	25		50.0	17.5
Land adjacent to Longburrow Hall, Stokenchurch	0.6	10		16.7	21.0
Coal Yard, Smalldean Lane, Saunderton	0.67	10		14.9	23.5
	<b>27.83</b>	<b>353</b>	<b>425</b>	<b>15.3</b>	<b>974.05</b>
<b>Overall totals</b>	<b>263.22</b>	<b>2995</b>	<b>3822</b>	<b>14.5</b>	<b>9212.7</b>

Source: AVDC