

**5 Year Housing Land Supply
Position Statement
October 2019**



Introduction

1. This Position Statement updates the Council's 5 year housing land supply position to take account of the adoption of the Wycombe District Local Plan. It uses the same supply position and base date as the March 2018 Position Statement. An updated 5 year housing land supply position from a 31st March 2019 base date will be published by the end of the 2019.
2. Wycombe District Council is able to demonstrate **more than** five years' supply of specific deliverable housing sites (from a 31st March 2018 base date). This accords with paragraph 73 of the 2019 National Planning Policy Framework (NPPF).
3. Wycombe District Council has a newly adopted Local Plan, with a housing target of 10,925. Where an authority has an up-to-date plan-based housing requirement (adopted in the last 5 years) that is the basis for assessing the 5 year housing land supply (5YS). The Local Plan housing target now forms the basis for the assessment for the housing requirement.
4. In the past year, the NPPF and Planning Practice Guidance (PPG) have been amended twice (in July 2018 and again in February 2019). This position statement incorporates the latest changes in national policy. As such it supersedes any earlier assessment of current 5YS.
5. This statement is intended for planning practitioners and stakeholders with an existing knowledge of the issues. To learn more about these issues please see the online [National Planning Practice Guidance](#).

Table 1 Calculation of Wycombe District Council Five Year Supply (September 2019)

	Component	Calculation	Result
A	Annual Requirement (Local Plan Target)		546.25
B	Base five-year requirement	A x 5	2,731
C	Adjustment from start of plan period (+/-)		+327
D	Five-year land requirement with buffer (5%)	C x 0.05	3,211
E	Housing land supply - dwellings		4,590
F	Housing land supply - years	(E/D) x 5	7.1

Table 2 Completions since start of plan period

Year	Net Dwelling Completions
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2013-14	266
2014-15	423
2015-16	376
2016-17	788
2017-18	551
Total	2,404

Calculating the 5YS Requirement

6. The total 5YS requirement for 2018-2023 is now 3,211 homes. This is calculated from the adopted Local Plan housing target of 10,925, which is 546 dwellings per year, and makes up the shortfall against the Local Plan housing target for the period 2013-18 in the current five year period.

Measuring the deliverable supply

7. We have reviewed the Council's monitoring data against the revised NPPF test for identifying deliverable sites (taking account of the further guidance provided in [the online NPPG](#)):

Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of 5 years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than 5 years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of [in our case] 5% to ensure choice and competition in the market for land.

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with **a realistic prospect that housing will be delivered on the site within 5 years**. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or

is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.

(Extracts from NPPF (2019) paragraph 73 and the glossary - our emphasis in bold).

8. The first category of sites (a) are presumed to be deliverable. The second category of sites (b) can be added if there is clear evidence of a realistic prospect that housing will be delivered.¹ The same test applies to other sites (e.g. emerging plan allocations).
9. The 2013-2033 Housing Trajectory (Appendix 1) sets out a full schedule of sites demonstrating a total supply of 4,590 dwellings from 2018-2023. Please note, the year-by-year trajectory in Appendix 1 was prepared in connection with the new Local Plan to underpin the Inspector's proposed modifications. The schedule is fully up-to-date and consistent with the new Local Plan including any proposed modifications.
10. Two amendments have been made to the new Local Plan trajectory in the current assessment of 5YS in this statement. The first is the enhanced windfall allowance to accord with NPPF 2018/19I (explained further below). The second is the exclusion of any Green Belt sites from current 5YS. (Their inclusion in the new Local Plan trajectory is justified as they will only be deliverable in five years if the Inspector approves their inclusion in the Plan.)
11. An overview of the makeup of the current 5YS is set out in Table 3.

Table 3 Overview of 5YS components

Component	Net dwellings
2018-23 – 'Category A'	2,523
2018-23 – 'Category B'	1,640
Small sites (yr 1-4)	328
Windfall allowance (yr 5)	99

¹ Recent planning appeals that have considered the detailed differences between the 2012 NPPF and the changes introduced by the 2018 NPPF have confirmed that the essential question is still whether there is '...a realistic prospect that housing will be delivered on the site in the next five years.....' (See for example the recovered appeal [APP/X0360/W/15/3097721](#) where the Inspector considered the relevance of St Modwen to the revised NPPF(2018) test and said "...in order for a site to be deliverable this does not mean that there needs to be certainty that it will be delivered. Nonetheless, the [2018] Framework, which post-dates the St Modwen Judgement, requires there to be '...a realistic prospect that housing will be delivered on the site in the next five years.....' This goes beyond whether a site is capable of delivery, and as set out in the Judgment is fact sensitive." (The Inspector was referring to the widely reported judgement *St Modwen Developments Ltd v SSCLG, East Riding of Yorkshire Council and Anor* [2017] EWCA Civ 1643)

Deliverable 5YS (total)	4,590
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12. Appendix 2 identifies the key sites that fall into the second category (category b') and provides evidence for their inclusion in the 5YS total. Sites have only been included where we are satisfied that there is clear evidence of a realistic prospect of delivery. As noted above, this does not require complete certainty, and the judgement for each site is fact sensitive. As this is a snapshot in time of the current factual position, addendum updates to Appendix 2 may be incorporated into this statement from time-to-time as necessary.
13. A small sites windfall allowance has been included within the supply in accordance with paragraph 70 of the NPPF. The NPPF allows for windfall sites to be included in the five-year supply (and beyond) where there is compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. Any allowance should be realistic, having regard to the Housing and Economic Land Availability Assessment (HELAA), historic windfall delivery rates and expected future trends.
14. 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.
15. Past trends for the last 5 years were originally used to identify average levels of completions in line with the agreed HELAA methodology, however this has been updated to a 10 year average bringing the windfall allowance up from approximately 43 units per annum to 48 units per annum. This is in line with a new agreed approach between the Buckinghamshire districts which seeks to ensure that the windfall allowance takes account of a longer time period to reflect a full economic cycle.
16. 48 units per annum excludes residential gardens as the data relates to the previous 2012 NPPF and guidance – which required this to be excluded. However, the 2019 NPPF and guidance now allows for housing intensification on residential gardens to be included. 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 50 dwellings per annum have been completed on residential intensification sites. This brings the total windfall allowance to an average of 98 dwellings per annum.
17. The conversion of office to residential 'Prior Approvals' are monitored and counted in the housing supply. Prior approval sites under 5 units (net) form part of the small sites permissions data and are factored into the windfall allowance for small sites, where

completions have taken place. Sites of 5 units and above are included as HELAA sites alongside other sites and are treated as having detailed planning permission. We feel that a further windfall allowance is not justifiable in relation to larger 'prior approvals' at this time, but it is recognised that this may provide some contingency in the overall supply, not just in Wycombe but in the other Bucks Districts.

Appendices:

Appendix 1: Housing Trajectory 2013-2033

Appendix 2: Key Site Commentary

Site ID	HCMS ID	2018 base date status	Address	Planning Reference	Area Ha	DELIVERABLE in 5YS to 2023	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	TOTAL NET DWELLINGS 2018 to 2033	Beyond 2033
	HTYLER152	Full Planning Permission	Oakingham House Kingsmead Business Park Frederick Place Loudwater Buckinghamshire HP11 1JU	17/07011/PNP30	0.40	20		5	15													20	
	HTYLER153	Full Planning Permission	Attobus Treadaway Hill Loudwater Buckinghamshire HP10 9QL	17/07721/PNP30	0.25	27		7	15	5												27	
SHW0651	HRYEME178	Full Planning Permission	Wycombe Summit, High Wycombe	16/06045/FUL	3.74	30		30														30	
SHW0419	HRYEME179	Full Planning Permission	JC and MP Smith, Princes Gate (also known as Ricketts road, Ryedale), High Wycombe, HP13 7AB	15/06660/FUL	0.15	32		15	17													32	
	HSTOKE150	Full Planning Permission	Axis40 Oxford Road Stokenchurch Buckinghamshire HP14 3SX	17/07762/PNP30	0.40	40		15	15	10												40	
SHW0339		Full Planning Permission	Collins House and 32 Bridge St, Corner of Bridge St/Desborough Rd		0.18	45		45														45	
SHW0657	HABBEY309	Full Planning Permission	Tempus Court Bellfield Road High Wycombe Buckinghamshire HP13 5HA	16/06883/PNP30	0.15	51	15	20	16													51	
SRD0148	HGHUGH136	Full Planning Permission	Uplands House Hotel, Four Ashes Road, Cryers Hill, Bucks, HP15 6LB	16/05053/FUL	7.60	59	25	34														59	
	HABBEY331	Full Planning Permission	Aria House, 80 Oxford Road, High Wycombe, HP11 2DX	17/06651/PNP30	0.42	72		2	35	35												72	
SHW0335	HOAKCA168	Full Planning Permission	Needham Bowl, Leigh Street	15/05594/FUL	0.33	77		35	35	7												77	
SSC0023	HSTOKE143	Outline Planning Permission	Land Adjacent to Longburrow Hall, Park Lane, Stokenchurch	16/07794/OUT	0.60	14			7	7												14	
SHW0322		DSA	Easton Street / Eastern Quarter, High Wycombe		3.38	0						45	45	47								137	
SHW0332		DSA	Duke Street, High Wycombe		0.68	0						45	45									90	
SHW0334		DSA	Land forming part of the former Green Street County First School site, Desborough Street, High Wycombe		0.24	0								11								11	
SHW0440		DSA	Brook Street, High Wycombe		0.19	0										10						10	

Appendix 2: Key Site Commentary

Table 2.1: Sites forecast in WDLP 5YS but discounted from current 5YS

Site ID	Address	New Local Plan Reference	Area Ha	DELIVERABLE in 5YS to 2023	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28
SHW0559	Clay Lane, Booker, High Wycombe	HW11	1.97	No				5	15	15	5			
SHW0633	Part of Greens Farm, Glynswood, Green Hill, High Wycombe	HW9	1.62	No				25	25					
SMA0105	Land adjacent to 89 Seymour Court Road, Marlow	MR6	0.30	No			9							
SNH0019	Land off Clappins Lane, Naphill	RUR7	2.24	No					32	32				

Large sites allocated in the emerging Local Plan - Adopted Core Strategy Reserve Sites

A.1. It should be acknowledged that Slate Meadow, Gomm Valley, Terriers Farm, Abbey Barn North, Abbey Barn South have been identified for development in earlier adopted (and still extant) development plan documents. They are not therefore dependent on the emerging Local Plan to establish the principle of development or for development to come forward.

A.2. By way of background, and as set out from paragraph 1.27 of our Local Plan Hearing Statement on High Wycombe (Matter 7):

1.27 Since the late 1980s, the former Reserve Sites have been considered through four different local plan preparation processes:

- The High Wycombe Area local Plan (1989)
- The Wycombe District Local Plan (1995)
- The Wycombe District Local Plan to 2011 (2004)
- The Core Strategy (2008)

1.28 Despite often substantial local objection, Inspectors have taken the line that the sites should be retained for future development needs rather than be added to the Green Belt. The principle of development on these sites has been established for many years. They were all originally excluded from the Green Belt to allow for the future expansion of High Wycombe and also of Bourne End when the Green Belt was first established in 1954. In 1972 Slate Meadow (BE1) was included in the Green Belt, but in 1989 it became, like the other sites, identified for future development and therefore removed from the Green Belt then.

1.29 In October 2014 the Council decided to release the five sites for development so as to boost the housing land supply. In order to respond to the strength of public interest and concerns, the Council established specific liaison groups, one for each site, together with a High Wycombe roundtable to consider the town wide infrastructure implications. The preparation of this Plan now presents the opportunity to formally allocate these site for development.

1.30 The impacts on transport and other infrastructure of the High Wycombe Reserve Sites were considered together so that each site could contribute to the whole, rather than going down the route of each site 'washing its own face.' For example, school places generated by HW7 are provided for within HW6, while HW7 provides sports uses that are incompatible with the topography of HW6. (This is not to say that children living in HW7 will need to travel to HW6 for schooling – take up of school places will in practice distribute across the school place planning area, according to parental preference, distance and school popularity.)

1.31 This process has led to the production of Development Briefs for the sites, which are expected to expedite the planning application process.

- A.3. In addition to their adopted plan status, we have been working with the landowners and developers since October 2014, with much survey and assessment work completed, and agreed negotiated positions on a wide range of issues. Development Briefs have been adopted on 4 of the 5 sites (not including Abbey Barn North). There are current planning applications for three of the sites (Gomm Valley and Slate Meadow in outline and Abbey Barn South in hybrid). There are Planning Committee resolutions to approve both the Slate Meadow and Abbey Barn South applications subject to completion of a S106 agreement. Public consultation on a draft Development Brief for Abbey Barn North is expected to commence soon.
- A.4. In submitting the new local plan for examination the Council has formally set out that these sites are suitable locations for development. None of these five sites are Green Belt, or otherwise reliant on allocation in the new local plan before permission can be granted. The depth and extent of pre-application and development brief work, the progress of these sites towards planning permission, and the active involvement of developers and their stated intentions to deliver, cumulatively satisfy me that these sites are deliverable within the 5YS.

Table 2.2: Deliverable large sites within 5YS, but without detailed planning permission.

Site ID	Address	Planning Reference	Area Ha	DELIVERABLE in 5YS to 2023	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28
SHW0004	Gomm Valley and Ashwells, High Wycombe	18/05002/R9OUTE 19/05281/OUTEA	73.96	335		40	105	95	95	95	90			

Overview: Application received. Not reliant on adoption of new local plan to come forwards. Principle of development supported by LPA.

Only part of this site is phased within the 5YS. The majority of the site is in single control (Aviva, with the developer Human+Nature), with the principal minority landowner being the Council. A detailed development brief for the whole site was adopted in July 2017 and pre-application discussions have been completed under a PPA service delivery framework for the main part of the site. An EIA scoping opinion was adopted by the Council in July 2016. An outline planning application for up to 1000 homes on the main site has recently been submitted. An outline planning application for 102 units on the Council controlled site has been submitted and is pending determination.

In their Local Plan Hearing Statement, Aviva stated first completions in 2019-20 and delivery rates that reflect 3 outlets on site. One of these outlet is controlled by Wycombe District Council as landowner, the other two by Aviva, who are working with the developer Human+Nature. Whilst the year-by-year trajectory is perhaps no longer up-to-date with the higher unit numbers contained in the planning application, a start in 2019-21 and 3 outlets are capable of delivering 335 units within the current 5 years. The adopted development plan status, detailed development brief work, the emerging plan, and the pending applications indicate there is a realistic prospect of this.

Site ID	Address	Planning Reference	Area Ha	DELIVERABLE in 5YS to 2023	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28
SHW0429	Abbey Barn South, High Wycombe	18/05363/FUL	31.06	300		75	75	75	75	75	75	75	25	

Overview: Application resolved to permit. Not reliant on adoption of new local plan to come forwards. Principle of development supported by LPA.

This site is directly adjacent to the former RAF Daws Hill site (under construction) and the Wycombe Summit site (which has detailed planning permission). There is an adopted development brief and a hybrid planning application which the Council has recently resolved to approve (for a total of 520-550 dwellings with a detailed first phase of 129 dwellings). The build rates adopted by the Council were originally provided by Berkeley Homes, and they have reconfirmed this (75dpa starting in 2019). They have also submitted applications for planning permission for marketing suites and on-site advertising, again indicating a certain momentum.

Site ID	Address	Planning Reference	Area Ha	DELIVERABLE in 5YS to 2023	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28
SHW0283	Land At Terriers Farm Kingshill Road High Wycombe Buckinghamshire HP13 5BB		23.06	220			20	100	100	100	100	80		

Overview: Pre-application PPA negotiated. Not reliant on adoption of new local plan to come forwards. Principle of development supported by LPA.

A development brief was agreed for adoption in March 2018. The site is majority controlled by Redrow and Persimmon, who are actively collaborating, as can be seen by their joint statement to the local plan examination. This provides the most up-to-date indications from the developers. Their statement said:

3.3 Persimmon and Redrow are in the process of agreeing a joint approach to bringing the site forward potentially in the form of a hybrid application, with a detailed first phased. It is expected that an application in this form could be submitted in mid-2019, with a view to obtaining planning permission end 2019. Allowing for discharging pre-commencement conditions and making a start of site, to include the necessary infrastructure works, first completions totalling around 20 dwellings could be expected in 2020/21.

Thereafter, completions of 100 dpa can be achieved in 2021/22 and 2022/23. This would result in a total of approximately 220 completions within the five year period to 2023.

Site ID	Address	Planning Reference	Area Ha	DELIVERABLE in 5YS to 2023	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28
SBE0033	Slate Meadow, Bourne End	18/05597/OUT	10.26	150		25	50	50	25					

Overview: Application resolved to permit. Not reliant on adoption of new local plan to come forwards. Principle of development supported by LPA.

Following the committee resolution to grant outline planning permission for 150 dwellings S106 negotiations have progressed (at the time of writing the S106 is engrossed awaiting signatures). Indications from the developers (Avant Homes and Croudace Homes) is that they are keen to progress. The Village Green is excluded from the developable area and is not a constraint to delivery.

SHW0524	Remainder of Leigh Street employment area, Desborough road, High Wycombe	17/06702/FUL	1.80	120			20	50	50	50	50	8		
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Update: Planning permission 1706702FUL was issued December 2017 and work has commenced on site. The initial phases of development can be deemed deliverable.

Site ID	Address	Planning Reference	Area Ha	DELIVERABLE in 5YS to 2023	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28
SSC0035	Land south of Mill Road, Stokenchurch		4.97	100			30	40	30					

Overview: Pre PPA discussions with developer. Not reliant on adoption of new local plan to come forwards. Principle of development supported by LPA.

The site is NOT in the Green Belt. It is at the edge of the large village of Stokenchurch, and is not reliant on allocation in the new local plan for delivery Land and Partners Ltd have confirmed their intentions to develop the site within 5YS. The current owner is in a binding agreement to dispose of the site on the grant of planning permission. Land and Partners Ltd anticipate an outline application to be submitted within a year and the site to be delivered within the next 5 years. They consider the site to be viable.

SHW0428	Abbey Barn North, High Wycombe		11.32	75				25	50	25				
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Overview: PPA discussions well advanced. Formal consultation on joint development brief imminent. Not reliant on adoption of new local plan to come forwards. Principle of development supported by LPA.

The indicative capacity of the site is circa 100 dwellings but not all of this can be delivered in 5YS. However, pre-application discussions are advanced and a draft development brief is to be published for consultation in the first half of 2019. The Council (as one of the main landowners) is working collaboratively with the other principal owners. There are not third party ransom implications. Completion of the site is affected by the planned road realignment (which has been approved for Housing Intensification Fund funding). the HIF funded road scheme can be built in two phases in such a way that the first phase releases the housing site, thereby facilitating early site delivery, partially within the 5 year period.

Site ID	Address	Planning Reference	Area Ha	DELIVERABLE in 5YS to 2023	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28
SLK0008	Rose Farm, Longwick	16/06673/OUT	3.05	65			25	25	15					

Overview: Outline permission granted. Not reliant on adoption of new local plan to come forwards. Principle of development consented by LPA.

In December 2018 (HELAA response) the landowner has stated that their intention is to submit for reserved matters approval in early 2019, and to develop the site themselves (with a development partner), with completions projected for 2019 – 2021. Despite the landowner's statements we consider a later start in 2020-21 is more realistic and this is reflected in the trajectory above.

SPR0032	Land at Princes Risborough Railway Station		2.05	45			25	20						
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Overview: Pre-application discussions ongoing. Not reliant on adoption of new local plan to come forwards. Principle of development supported by LPA. Previous withdrawn applications resolved to grant subject to S106.

This is one of two adjoining former factory sites in the town – forming part of a wider site with Whiteleaf Furniture. Both sites are now controlled by the developer and building company, W E Blacks Ltd. Planning Committee had previously resolved to grant permission for redevelopment of this (in 2008) but when the site was acquired by Blacks (who already owner Whiteleaf Furniture) the focus shifted to Whiteleaf Furniture as the first phase of a larger redevelopment. The focus has now shifted back to this site, and delivery is expected within the current 5YS.

Site ID	Address	Planning Reference	Area Ha	DELIVERABLE in 5YS to 2023	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28
SHW0400	Delafield Heights South, Longland Way / Pettifer Way, previously known as Flats off Chairborough Road		0.55	40			20	20						
SHW0564	Delafield Heights North, (Longland Way / Pettifer Way, also known as Castlefield Estate, High Wycombe)		3.32	32			15	17						

Overview: Pre-application discussions ongoing. Not reliant on adoption of new local plan to come forwards. Principle of development supported by LPA.

These sites are in single ownership of Red Kite Community Housing. Five years ago the Council's housing stock was transferred to Red Kite, in part to facilitate a series of medium scale estate redevelopment projects across the District. Consequently, there is a very close working relationship between the landowner and the Council. The current proposal for these two closely related sites are to demolish 97 homes and provide 186 units (89 net increase). This is 17 units higher than the assumed quantum in the trajectory. Current occupants are subject only to a 30 day notice to quit. Pre-application discussions are well advanced and a PPA is being finalised to facilitate a detailed planning permission in 2019. The scheme comprises mid-rise apartments and delivery rates will therefore be high.

SHW0416	Former Bassetsbury Allotments, Bassetsbury Lane, High Wycombe	18/06767/FUL	2.86	30			30							
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Overview: Application resolved to permit. Not reliant on adoption of new local plan to come forwards. Principle of development supported by LPA.

This is a surplus Council site in the urban area. Planning Committee resolved to grant permission for park home development subject to a planning obligation on 12.12.18.