

## **Chiltern District Council and South Bucks District Council**

### **Draft Housing and Economic Land Availability Assessment (HELAA)**

**2<sup>nd</sup> Published Document (Superseding January 2016  
Version)**

**May 2017**

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**CHILTERN**  
District Council



**SOUTH BUCKS**  
District Council

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Stronger in partnership

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## **Disclaimer**

**It is important to note that the Draft HELAA does not represent policy and will not determine whether a site should be granted planning permission. It is in effect a 'pool' from which sites can be tested on their potential suitability, availability and achievability.**

**In essence it gives the Councils an indication of:**

- **The sites likely to come forward for development;**
- **What type of development could be delivered on these sites; and**
- **A potential timeframe for their delivery.**

**The HELAA is used to inform the preparation of the emerging Local Plan.**

**This is an emerging evidence base document; the Councils intend to publish a final HELAA which includes a Housing Land Supply Trajectory prior to the publication of the Draft Local Plan.**

## **Executive Summary**

- i. This assessment focuses on land available for housing, employment and other economic development uses (as defined by the NPPF), and residential institutions (Use Class C2). The purpose of the assessment is to test options for development (types listed above) within the built-up areas and previously developed land in the Green Belt in order to demonstrate the potential supply against identified objectively assessed development needs.
- ii. This version of the assessment updates and supersedes the previous version published last year. This is a draft however as further work is required (see 'Further Work/Key Actions following this Update') in order to produce the final HELAA required by the methodology (Stage 5). This assessment will however inform the ongoing evidence base for the emerging Local Plan and Duty to Co-operate discussions around unmet housing need and employment distribution.
- iii. All of the sites tested as part of the HELAA and a brief summary of their status within the assessment is contained in Appendix 1 (separate document).
- iv. In line with the HELAA Methodology:
  - A wide range of potential sources of sites were investigated (shown in Table 1). These identified **865** sites for assessment (an additional 225 to previous version of the HELAA published last year);
  - The latest monitoring data taken from 2015/16 monitoring period showed that of the 865 sites identified **6 of these sites have had development completed** since the previous HELAA resulting in **859** sites left for testing at Stage 1;
  - An initial desktop review sifted out sites which should be excluded from the assessment at Stage 1 (Table 3) based on the criteria set out in the Methodology, (shown in Appendix 2 and 3). All Green Belt sites in both Chiltern and South Bucks (not previously developed land) were excluded at Stage 1 – this resulted in **547 sites being excluded** at this stage and **312 being carried forward** for more detailed assessment at Stage 2 (more detail in 'Stage 1 – Site/ Broad Location Identification');
  - Sites advancing to Stage 2 were then assessed at Stage 2 as to their '**suitability**' for the type of development proposed, '**availability**' i.e. that there weren't any insurmountable issues with the site and that it was expected to be developed. If suitable and available, the sites were tested for their potential '**achievability**'<sup>1</sup>. This was essentially an initial high level judgement about the economic viability of the site and the ability of the owner to develop it within a particular time period (results from Stage 2 are shown in Appendix 4, 5 and 6) – **146 sites** were

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<sup>1</sup> Sites deemed not to be suitable or available where not assessed on their achievability.

excluded at Stage 2 with **166** sites being deemed 'suitable', 'available' and 'achievable (more detail in 'Stage 2 – Site/ Broad Location Assessment');

- Of the 166 sites being deemed 'suitable', 'available' and 'achievable, for residential, employment or C2 uses, **125 were deemed deliverable** (i.e. could be delivered in the first 5 years), **21 were deemed developable within 6 to 10 years** and a further **20 were deemed developable beyond 11 years**. Appendix 8 contains table showing these sites;
- Where the capacity of the site has not been defined through a planning application they were assigned a capacity range: a standard density of 50 dwellings per hectare (dph) for town centre sites and 30 dph for other urban sites was applied to the 'developable area' in the first instance with a higher level design-led approach being taken to determine the other capacity range – the lowest and highest of these two figures were then used to indicate the range;
- Windfall sites<sup>2</sup> have been included in accordance with the advice in the NPPF/NPPG. The agreed Joint HELAA Methodology recommends that each Council assess windfall completions over a ten year period in order to identify past trends<sup>3</sup>. This assessment is set out in Appendix 7 for both Chiltern and South Bucks Districts - this shown that on average the Councils delivery **55 dwellings per annum** (more detail in 'Stage 3 – Windfall Assessment');
- Information from the latest planning application data for completions and sites with planning permission was added to the supply used to determine the residual requirement against the objectively assessed need for residential, employment and C2 units identified in the latest Housing and Economic Development Needs Assessment, (shown in the following table) (more detail is available in 'Stage 4 – Assessment Review').

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<sup>2</sup> Windfall sites are sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed land that has unexpectedly become available. (Annex 2 'Windfall' definition of the NPPF (2012)).

<sup>3</sup> It should be noted that the definition of windfall changed in June 2010, when residential gardens were specifically excluded from being included as windfall sites. This has meant that past monitoring data has had to be amended in order to exclude garden sites from the overall total.

<b>Residential Requirements (dwellings) (net)</b>				
OAN (HEDNA)	14,900 <sup>4</sup>			
Residual	9,756 (Lower Range)	9,189 (Upper Range)		
<b>Employment Requirements (sqm) (net)</b>				
	B1a/b	B1c/B2	B8	Total
OAN (HEDNA)	48,490	-34,460	41,040	55,070
Residual	34,072	-33,167	19,648	20,552
<b>C2 Units Requirements (units) (net)</b>				
OAN (HEDNA)	850			
Residual	366			

**Explanatory Notes:**

**OAN** – Objectively Assessed Need Requirement (as defined in the Housing and Economic Development Needs Assessment)

**Residual** – Residual requirement once factoring in completions, supply from HELAA sites, sites with planning permission (too small for inclusion in the HELAA) and (for residential development) windfalls,

**Key Updates from 2016 Draft**

- v. The HELAA Methodology requires an iterative approach to the process. This update is effectively a review of Stages 1 to 3 of the January 2016 draft HELAA as well incorporating Stage 4 which draws on the latest evidence base in order to demonstrate the Councils' position in relation to meeting its development needs (more information is available in the background section). As a result this report now includes:

**Updates to Stages 1 to 3 (from January 2016 HELAA):**

- Full Stage 2 assessments for sites within South Bucks District;
- Additional sites submitted as part of the Regulation 18 (Incorporating Issues and Options) Consultation (Jan-Apr 2016) and Green Belt Preferred Options Consultation (Oct-Dec 2016);
- Updated planning application monitoring information (i.e. extant planning permissions) up to 31<sup>st</sup> March 2016 (2016) and major housing applications until 20<sup>th</sup> Jan 2017;
- Updated Windfall data incorporating monitoring years 2014/15 and 2015/16 (Stage 3);

<sup>4</sup> At the time of publication the HEDNA was in the process of having a mathematical error corrected which results in the OAN increasing from 14,700 (as published in December 2016) to 14,900.

- Urban Design Work has been undertaken to refine some of the capacity estimates previously included in the report;
- Exclusion of sites identified in the Draft Green Belt Part 2 Assessment – initially the Methodology stated these would be considered however this assessment is still in draft and these sites will be considered passed Stage 1 until further work has been carried out;
- Considerations for the White Paper 'Fixing our Broken Housing Market' (published February 2017) – most notably making the most of previously developed land, most town centre sites have had their density reviewed, a number of these sites now have an initial density of 50dph (lower range) and 100dph at the upper range; and
- Taking account of the scrutiny of the HELAA by Aylesbury Vale District Council (through GL Hearn) as part of the Duty to Co-operate discussions on unmet housing need.

**New to this Report:**

- Updated Objectively Assessed Development Needs figures from the Housing and Economic Development Needs Assessment (HEDNA December 2016) and May 2017 taking account of an identified mathematical error (see footnote 4);
- Updated completions relating to residential, employment and C2 uses since the start of the plan period (2014 to 2016);
- A synopsis of the emerging evidence base and how it has been considered as part of the HELAA; and
- A summary of the land supply for housing, employment and care home provision for the years 0 to 5, 6 to 10, and 11 years or beyond (Stage 4).

**Further Work/ Key Actions following this Update**

- vi. Following the publication of this version of the HELAA the Councils will continue to update the assessment. In order to produce a final HELAA (Stage 5) the Councils will carry out these key actions:
- Continue to co-operate with neighbouring authorities in identifying opportunities to meet the objectively assessed needs of the Housing Market Area (defining the plan target);
  - Consider the implications of changes to Government Policies following the General Election, implications of the Housing White Paper, and future regional infrastructure projects such as the Oxford to Cambridge Expressway;

- Consider (and include) any land identified in the Brownfield Registers of both Councils (once established) and whether existing HELAA sites are eligible on the registers;
- Input additional sites following consultation with public bodies and other stakeholders to identify new sites and determine whether existing suitable, but unavailable sites could be brought forward;
- Consideration of emerging evidence base yet to be completed such as the Employment land and town centre development opportunities assessments;
- Update supply of sites following 2016/17 monitoring i.e. extant planning permissions, completions, expiries etc. (due to take place in June 2017);
- Include sites/options emerging from the updated Green Belt Part 2 Assessment taking account of additional options put forward as part of the Green Belt Preferred Options Consultation;
- If it is proposed to remove settlements from the Green Belt as part of the emerging Local Plan, sites within these settlements will be considered;
- Determining the 5 Year Housing Land Supply position for both authorities based on the Objectively Assessed Housing Need (OAHN) and agreed unmet housing need position to be accommodated elsewhere;
- Prepare a housing trajectory taking account of the evidence base work on housing lead in times and delivery rates for major sites; and
- Exploring opportunities through Estates Renewal with local registered landlords, although it is expected that any opportunities will be long-term and may fall outside of the plan period.

## **Introduction**

1. This assessment is an update to the January 2016 version of the Draft HELAA, published as part of the Regulation 18 (Incorporating Issues and Options) Consultation for the emerging Chiltern and South Bucks Local Plan.
2. The purpose of the assessment is to test development options within the built-up area and previously developed sites in the Green Belt in order to demonstrate whether there is sufficient supply of sites within these areas to deliver the objectively assessed need for development. This draft document forms part of the evidence base for the emerging Chiltern and South Bucks Local Plan.
3. The National Planning Policy Framework (NPPF) requires every local planning authority to assess the amount of land that is available for housing and economic development in its area. This is known as the Housing and Economic Land Availability Assessment (HELAA). In the past these assessments tended to focus solely on housing and were known as Strategic Housing Land Availability Assessments (SHLAAs). SHLAAs have now been expanded to include economic development uses and are now known as HELAAs, (sometimes referred to as Strategic Housing and Economic Land Availability Assessments (SHELAA)).
4. This assessment focuses on land available for housing, employment<sup>5</sup> and other economic development uses (as defined by the NPPF), and residential institutions (Use Class C2). The need for additional sites for retail, leisure, gypsies and travellers, infrastructure provision such as new schools, community facilities etc. will be dealt with in separate evidence documents as part of the Local Plan evidence base.
5. The Draft HELAA is a technical document which provides part of the ongoing evidence base for the Chiltern and South Bucks Emerging Local Plan 2014-36. It provides the following:
  - A list of sites for housing, employment land and residential institutions<sup>6</sup>. The locations of specific sites are shown on tables and maps in relation to their status at various stages of the assessment (Appendix 1 contains a table showing a summary of all the sites included);
  - Constraints to development and if, and how, they could be overcome in the prescribed timescale;

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<sup>5</sup> This is defined as land within the B use classes or similar sui generis uses.

<sup>6</sup> Sites proposed as residential institutions such as, for example, care homes for the elderly were recorded separately to general housing proposals. This is because they fall within a separate use class within the Use Classes Order (C2 as opposed to C3) and to allow them to be considered separately from the overall housing supply.

- Assesses the deliverability of the sites in terms of their suitability, the likelihood of development (the availability and achievability) and when they are likely to come forward; and
  - An indicative quantity of housing, C2 accommodation or amount of employment land and/or economic development land that can be delivered on each identified site or on windfall sites.
6. The base date for the Chiltern and South Bucks HELAA is 31<sup>st</sup> March 2016 for planning applications, with an update on major housing applications meeting the HELAA criteria up to 20<sup>th</sup> Jan 2017.
  7. The HELAA will be regularly updated.

## **Methodology**

8. To ensure a consistent methodology across the Housing Market Area<sup>7</sup> and Functional Economic Market Area<sup>8</sup>, a joint methodology was drawn up and consulted on by Aylesbury Vale, Wycombe and Chiltern District Councils. The methodology was subsequently adjusted to take account of comments received during the consultation process and these were reflected in the January 2016 version of the Report.
9. The agreed Joint HELAA Methodology and the Summary of Consultation Responses are available on the Councils' websites at:  
[www.chiltern.gov.uk/planning/localplan2014-2036/evidence](http://www.chiltern.gov.uk/planning/localplan2014-2036/evidence) and  
[www.southbucks.gov.uk/planning/localplan2014-2036/evidence](http://www.southbucks.gov.uk/planning/localplan2014-2036/evidence).
10. The Central Buckinghamshire Joint HELAA Methodology, used for the Draft Chiltern and South Bucks HELAA, is based upon the standard methodology set out in the National Planning Practice Guidance (NPPG) and summarised below in Figure 1.
11. South Bucks District Council was one of the local authorities consulted with regard to the Central Buckinghamshire HELAA Methodology and made comments on its contents. Once the decision was taken to produce a Joint Local Plan for South Bucks and Chiltern<sup>9</sup>, it was considered that the evidence documents needed to be aligned and consequently the Central Buckinghamshire HELAA Methodology has also been used as the basis for the HELAA work in South Bucks District.
12. Each of the districts in Buckinghamshire have undertaken work on their respective HELAA's, following the agreed methodology. Some changes to this methodology have been carried out as a result of the publication of the Housing White Paper – see Housing White Paper 'Fixing our broken Housing Market' in the 'Background' section.

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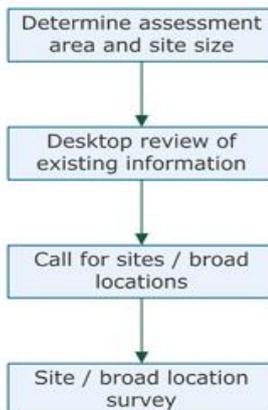
<sup>7</sup> Geographic area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.

<sup>8</sup> Geography of commercial property market, in terms of the location of premises and the spatial factors used in analysing demand and supply.

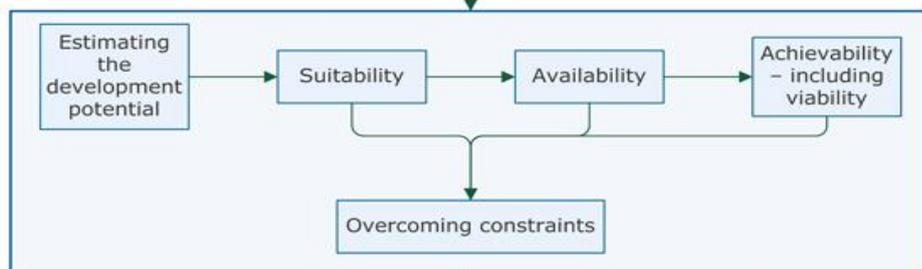
<sup>9</sup> The decision was taken on 3rd November at Chiltern and 10th November at South Bucks District Council.

Figure 1: HELAA Methodology

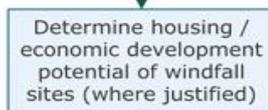
**Stage 1 - Site / broad location identification**



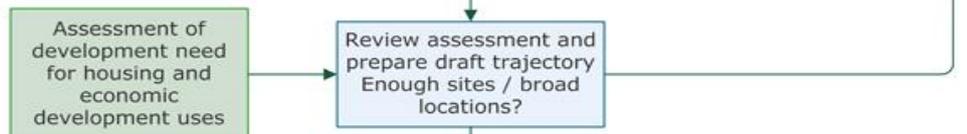
**Stage 2 - Site / broad location assessment**



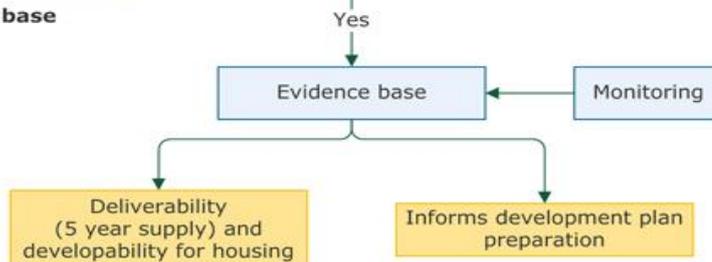
**Stage 3 - Windfall assessment**



**Stage 4 - Assessment review**



**Stage 5 - Final evidence base**



Source: NPPG 'Housing and Economic Land Availability Assessment' (Paragraph: 006, Reference ID: 3-006-20140306)

## **Background**

13. The previous draft of the HELAA identified that there was insufficient land within the built up area to meet the development needs of the Districts. As part of the agreed methodology (see above) the Councils should then review and update its evidence base in order to identify sites or broad areas which can meet the needs.
14. This section provides a background to how the Councils have progressed the evidence base, plan making progress and other key updates which have informed the updated HELAA.

### **Local Plan Timetable (Local Development Scheme)**

15. The Local Plan is currently being progressed to a tight timetable, as set out in the adopted Local Development Scheme (December 2016). At the time this document was being prepared a Regulation 18 (incorporating Issues and Options) Consultation and a consultation on Preferred Green Belt Options (detailed further below) had been carried out as part of the preparation of the emerging Local Plan.
16. The emerging Chiltern and South Bucks Local Plan 2014 to 2036 will replace the current Development Plan documents. Key dates are provided below:
  - Publication (Draft Plan) (Regulation 19) Consultation [October/November 2017];
  - Submission of the Plan to the Secretary of State (Regulation 22) [March 2018];
  - Examination in Public (EiP) (Regulation 24) [June 2018]; and
  - Adoption (Regulation 26) [November 2018].

\* These dates may be subject to review.

### **Housing and Economic Development Needs Assessment (HEDNA)**

17. The starting point for any assessment of establishing the unmet need is defining the **need**. The Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA) indicates the need<sup>10</sup> for housing, employment and C2 care home units in the two Districts.
18. The latest HEDNA, published in December 2016, indicates that there is a need for additional development in the Districts for the period of 2014 to 2036 as shown below:
  - **14,900<sup>11</sup> homes approximately 677 homes per year;**

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<sup>10</sup> This is the fully objectively assessed need identified in line with national policy and practice guidance. The figure is an 'unconstrained' figure – i.e. it is not adjusted to take account of any policy or environmental constraints.

<sup>11</sup> At the time of publication the HEDNA was in the process of having a mathematical error corrected which results in the OAN increasing from 14,700 (as published in December 2016) to 14,900.

- **55,070<sup>12</sup>** square meters of floorspace/ **9.7 hectares** of land in all **B use class employment use** (more details in Table 7) ; and
- **850** institutional or **C2 accommodation units**, 410 in Chiltern and 440 in South Bucks.

### **Duty to Co-operate**

19. The Duty to Co-operate (DtC) is an ongoing statutory duty placed upon local authorities which requires them to co-operate with their neighbouring authorities and other statutory bodies<sup>13</sup> on strategic, cross-boundary issues, such as meeting housing need within the Housing Market Area and employment need in the Functional Market Area.
20. Given the objectively assessed need for development in the Districts (detailed above) and high constraints (e.g. Green Belt and AONB) it is unlikely Chiltern and South Bucks Districts are going to be able to meet their full objectively assessed need. As part of the DtC, the two Councils have been in discussion with the other Buckinghamshire authorities on accommodating housing needs across the Housing and Functional and Economic Market Area.
21. The Councils have a Memorandum of Understanding (MoU)<sup>14</sup> with the Buckinghamshire authorities. This is a written agreement that the Buckinghamshire Districts have committed to working under the Duty to Co-operate to ensure the growth needs of the three Council areas are appropriately considered within the wider sub-regional context, against the NPPF whilst taking account of any other material considerations so that their collective development needs of the HMA are to be met within the HMA in the most sustainable ways.
22. The MOU sets out the various steps the authorities will undertake in order to assess and address the development needs of the Housing Market Area. Paragraph 1 (d) relates to unmet housing needs, this acknowledges that the capacity work (such as HELAA) is likely to identify that there will be insufficient supply within the built-up areas to meet the OAN for both Chiltern and Wycombe, which means this need may need to be met in the relatively unconstrained part of the HMA lying outside of the Green Belt and the AONB which will be addressed in the Vale of Aylesbury Plan

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<sup>12</sup> Figure 107 of the published HEDNA document (page 136) shows the absolute forecast changes for Economic B Use Class floorspace in both floorspace demand (square metres) and land demand (hectares) by use class for South Bucks. The figures relating to Floorspace Demand in 2036 were erroneously based on 2033 figures, correcting this error the need increases the OAN from 43,000 to 52,500 for South Bucks – this is reflected in the overall figures for both Districts.

<sup>13</sup> Duty to Co-operate bodies are listed in Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

<sup>14</sup> Buckinghamshire SHMA/FEMA Duty to Co-Operate Memorandum of Understanding between AVDC, BCC, SBDC, CDC and WDC (January 2016)

[www.chiltern.gov.uk/CHttpHandler.ashx?id=8032&p=0](http://www.chiltern.gov.uk/CHttpHandler.ashx?id=8032&p=0)

(VALP). It is expected that this MOU will soon be updated and the Council will also have a MOU with Aylesbury Vale District Council.

23. Once the unmet need figure is agreed then Chiltern and South Bucks will be in a position to set a development needs target in the plan and then produce housing and employment trajectories based on the HELAA supply. As this has yet to be established the HELAA document will demonstrate the level of supply against the current Objectively Assessed Need, established in the HEDNA in order to inform DtC.

#### **Call for Sites**

24. Prior to the Councils formally agreeing to produce a joint Local Plan each authority was progressing with single Local Plans for their District. As part of this process they carried out separate Call for Sites alongside the Regulation 18 Local Plan Consultation at both Chiltern and South Bucks District Councils. The sites submitted as part of the Call for Sites have been included in the HELAA.
25. These Consultations were undertaken in January to March 2015 for Chiltern and February to April 2015 for South Bucks.

#### **Joint Chiltern and South Bucks Local Plan (2014-2036) Initial (Regulation 18) Consultation Incorporating Issues and Options**

26. The January 2016 version of the HELAA accompanied the Initial Consultation (Regulation 18) which also incorporated an Issues and Options as part of the Consultation. 5,775 responses were received as part of this consultation and an **additional 96 sites** were identified which have been input into the HELAA process.

#### **Monitoring Planning Permissions and Planning Application Decisions**

27. All new permissions within the 2015/16 monitoring period (1<sup>st</sup> April 2015 to 31<sup>st</sup> March 2016) meeting the Stage 1 scale requirements were input into the HELAA in order to be assessed on availability and achievability (as suitability had already been established).
28. **6** existing HELAA sites have had development completed during the 15/16 monitoring period (1<sup>st</sup> April to 31<sup>st</sup> March) and have therefore been withdrawn from consideration. More details on completions within the plan period are contained in Stage 4 – Assessment Review.
29. Whilst producing the HELAA the figures for the 2016/17 monitoring figures were not available, the Councils have included extant permissions on sites meeting the HELAA criteria up till 20<sup>th</sup> January 2017; please note many of these may already have been built or commenced at the time of publication and will be updated when the full monitoring figures for 16/17 period become available.

30. The HELAA also identified sites which had applications refused but met the Stage 1 criteria which were refused or withdrawn where the principle of development for residential, employment or C2 use was not a reason for refusal.

### **Green Belt Assessment**

31. The Green Belt Assessment is underway as part of the emerging Local Plan, this is being progressed in two parts:
- **Part 1** – is a County wide study<sup>15</sup> which assessed strategic parcels (areas) of the Green Belt against the purposes of the Green Belt, as defined in the NPPF, and recommended areas that warranted further consideration as part of Part 2. This was published in March 2016; and
  - **Part 2** – is being conducted separately in each Local Authority. Chiltern and South Bucks District Councils' draft Part 2 Assessment was published in October 2016, this assessed areas identified in Part 1, Regulation 18 Consultation options, and Site Nominations (including the Call for Sites). The purpose of this is to identify areas/options where exceptional circumstances may exist to release them from the Green Belt.
32. The Green Belt Assessment Part 2 is currently being updated following the Preferred Options consultation, options identified as part of this process will be included in future versions of the HELAA.

### **Green Belt Development Options Appraisal**

33. Following on from the Draft Green Belt Assessment Part 2 the Councils assessed each option identified in the Draft Green Belt Assessment Part 2 against a range of factors, drawing on a number of evidence base document findings. This concluded which areas may have development potential in order to test further through them for release in the Green Belt Preferred Options Consultation and other assessments/evidence base work.

### **Joint Chiltern and South Bucks Local Plan (2014-2036) Green Belt Preferred Options Consultation**

34. From 31<sup>st</sup> October 2016 to 12<sup>th</sup> December 2016 the Councils carried out a public consultation on 15 Green Belt Options identified through the Draft Green Belt Assessment Part 2 and Green Belt Development Options Appraisal.
35. As part of the consultation the Councils provided the opportunity for stakeholders to:

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<sup>15</sup> Carried out by ARUP on behalf of Aylesbury Vale, Chiltern, South Bucks and Wycombe District Councils and Buckinghamshire County Council.

- a) comment on the suitability of these options;
  - b) suggest requirements for development (if release is suitable);
  - c) comment on the evidence base; and
  - d) promote alternative Green Belt options for testing.
36. 3,027 responses were received from this consultation and 67 late responses were received. This resulted in **an additional 47** sites being put forward for consideration.
37. The Councils also wrote to the main land owners promoting the 15 Green Belt Options and conducted searches through the Land Registry in order to identify land ownership titles and land owners within these options in order to identify their aspirations and gain an understanding of the likely **availability** of the sites, should the Councils pursue these options through the Local Plan process.

#### **Housing White Paper 'Fixing our broken Housing Market'**

38. On 6th February 2017 the Department of Communities and Local Government (DCLG) published the White Paper 'Fixing our broken housing market'. This set 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. This included:
- Planning for the right homes in the right places with greater emphasis is placed on quality, character and higher densities;
  - Building homes faster by changing the way land supply for housing is assessed - linking infrastructure provision with housing development, tackling skills shortages, propose to set an agreed 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.
39. The immediate implications have been reflected in the HELAA update are:
- Protection to the Green Belt (paragraph 1.39) - Green Belt boundaries should only be reviewed when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including: making effective use of suitable brownfield sites, the opportunities offered by estate regeneration; and optimising the proposed density of development, and exploring whether other authorities can help to meet some of the identified need; and

- Potential change national planning policy to ensure that the most effective use is made of previously developed land (paragraph 1.53) - make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing requirements and address the particular scope for higher-density housing in urban locations.
40. Sites without planning permission, within public ownership and in town centres were deemed to have a potential capacity of 50 dwellings per hectare (at the lower range) and upwards of 100 dwellings per hectare at the upper range in response to the proposal to use land more efficiently. In response the Councils also have written to other public bodies and Housing Associations regarding surplus land in their ownership and are starting to explore the opportunity for larger scales estates renewal.
  41. Following the publication of the White Paper the Council written to public bodies and registered social landlords to establish whether there are opportunities for development on sites they own or whether there are opportunities for estates renewal. Results of this will be considered as part of future versions of the HELAA.
  42. Once more details emerge in the coming months on some of the other proposals identified in the Housing White Paper then the HELAA will be updated accordingly. The most crucial changes could be the introduction of a standard methodology which defines the objectively assessed housing needs.

## **Stage 1 – Site/ Broad Location Identification**

### **Source of Sites at Stage 1**

43. Table 1 below sets out the potential sources of sites for the Chiltern and South Bucks HELAA. Sources *in italics and blue* show new sources of sites incorporated in this update.

Table 1: Sources of sites for inclusion in Chiltern and South Bucks HELAA

<b>Source</b>	<b>Description</b>
<b>Any pre-application inquiries/ expired permissions which might yield sites for inclusion</b>	Sites where the Councils are already in discussion with a developer (where it is not confidential or where the landowner agrees to publicise the site). Sites where planning permission has expired in the last 5 years where there is a reasonable prospect of a new application being submitted to the local planning authority.
Undetermined planning applications at <b>appeal</b>	Sites which could potentially be approved for development.
<b>Planning application refusals or withdrawn</b>	Only sites where reasons are not based on the principles of residential or economic development, for example where refusal is due to matters of design.
<b>Unimplemented / outstanding planning permissions</b> for housing and employment buildings	Sites where development has been permitted, but has not commenced and permission has not expired. Information for these sites will be sourced from the Monitoring Reports.
Planning permissions for housing and employment buildings <b>under construction</b>	Sites where development has started, but is not completed.
Prior Approval Certificate for <b>Office to Residential Accommodation</b>	Certificates allowing the conversion of offices into residential uses will be included in the source of sites where they are not already completed.
Existing <b>Local Plans</b> (includes Core Strategy and Delivery DPD sites) and <b>emerging Neighbourhood Plans</b> allocations that have not been granted planning permission.	Sites which have been allocated for housing or economic development which have not yet been completed. This may also include sites which were considered as part of preparing a Local Plan or Neighbourhood Plan but were subsequently not taken forward for allocation, for example sites identified at the Pre-submission stage of a Plan or issues and options stage for a Local Plan.
Housing and economic development sites put forward during a <b>“Call for Sites”</b> consultation and throughout the Local Plan production.	Any sites submitted directly to the councils for consideration through periods of consultation and/or submitted independently e.g. from landowners, agents and developers. Chiltern Council carried out a formal ‘Call for Sites’ from 8th January to 6th March 2015 and South Bucks from 26 <sup>th</sup> February to 24 <sup>th</sup> April 2015.  The ‘Call for Sites’ consultation may include sites promoted by the Local Enterprise Partnership (LEP) and other Duty to Co-operate

<b>Source</b>	<b>Description</b>
	organisations.  The Councils also accepted site nominations submitted outside of the Call for Sites (known as Developer Site Nominations).
<b>Vacant and derelict land/buildings</b>	Sites identified in either rural or urban locations, where a building is vacant or underused. Information may be sought from local authority empty property register, English House Condition Survey, engagement with estate agents and property agents and the valuation office database.
<b>Surplus public land</b>	Land owned/ promoted by the District Councils, Bucks County Council or other public bodies e.g. the MoD or NHS.
Sites already within the <b>Strategic Housing and Land Availability Assessment (SHLAA)</b> process	Sites previously submitted for the SHLAAs process, will remain within the HELAA process and be reconsidered for each review provided that they meet the criteria for assessment set out within the HELAA.
Sites recommended for residential or mixed use in a recent <b>Employment Land Review</b>	Sites which are no longer suitable for economic development use and which have been identified for release for housing or mixed use schemes.
Site suggestions from <b>Officers or Members</b>	Sites from general knowledge of the Districts will be included if they have not already been identified through other sources of supply. This may be through other technical studies including development briefs and may include sites which adjoin urban areas on the edge of a District within the HMA.
<i>Housing and economic development sites put forward during the <b>Regulation 18 (Incorporating Issues and Options) Consultation</b></i>	<i>Any sites (not previously identified) submitted directly to the Councils for consideration through the consultation period which ran from 19th January 2016 to 5pm on 14th March 2016.</i>
<i>Sites put forward as part of the <b>Green Belt Preferred Options Consultation</b></i>	<i>Any sites (not previously identified) submitted directly to the Councils for consideration through the consultation period which ran from 31<sup>st</sup> October to 12<sup>th</sup> 5pm on 12<sup>th</sup> December 2016.</i>
<i>Sites within the <b>Green Belt Preferred Options Consultation</b> identified through the Land Registry*</i>	<i>Sites identified through land registry searches of the 15 Strategic Green Belt Options in the Green Belt Preferred Options Consultation. Known land owners were subsequently written to in order to determine their aspirations for these sites.</i>

\* - The Councils have changed their approach to Green Belt sites identified through the Green Belt Assessment following from the publication of the Housing White

Paper 'Fixing our broken Housing Market' in February 2017, all Green Belt sites (not previously developed land) have been excluded at Stage 1.

44. In the January 2016 HELAA 303 sites were identified in Chiltern and 301 in South Bucks; 604 in total. In this update of the assessment 437 sites were identified in Chiltern and 428 in South Bucks, totalling **865 overall**.
45. Table 2 identifies the 'original'<sup>16</sup> source of sites used to identify these sites in the two Districts. Appendix 1 (separate document) contains tables showing all of the sites within the HELAA, how they were identified, and their status within the document.

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<sup>12</sup> 'Original' because many of the sites have come forward more than once since the original HELAA was published, for example many sites identified in the Call for Sites were also put forward in the Regulation 18 and Green Belt Preferred Options Consultations. To avoid double counting sites have been placed in the category where they originally submitted to the Councils'.

Table 2: Sources of Sites within the HELAA

Source	Chiltern		South Bucks		Overall	
	Sites	%	Sites	%	Sites	%
Pre Applications	0	0.00	0	0.00	0	0.00
Expired Planning Permissions	1	0.23	0	0.00	1	0.12
Planning Appeals	0	0.00	0	0.00	0	0.00
Refused or Withdrawn Planning Applications	5	1.14	54	12.62	59	6.82
Unimplemented Planning Permissions	29	6.64	81	18.93	110	12.72
Planning Permissions Under Construction	9	2.06	32	7.48	41	4.74
Prior Approvals	19	4.35	12	2.80	31	3.58
Development Plan: Core Strategy	1	0.23	1	0.23	2	0.23
Development Plan: Adopted Local Plan	1	0.23	0	0.00	1	0.12
Development Plan: Delivery DPD (now withdrawn)	1	0.23	0	0.00	1	0.12
Development Plan: Neighbourhood Plan	0	0.00	1	0.23	1	0.12
Development Plan: Buckinghamshire Minerals and Waste LDF	0	0.00	0	0.00	0	0.00
Call For Sites	153	35.01	65	15.19	218	25.20
Regulation 18 Consultations (respective single Local Plans)	7	1.60	0	0.00	7	0.81
Developer Site Nominations*	38	8.70	23	5.37	61	7.05
Vacant and Derelict Land	0	0.00	0	0.00	0	0.00
Publically Owned Land	14	3.20	21	4.91	35	4.05
Existing SHLAA Sites	51	11.67	32	7.48	83	9.60
Employment Land Review	12	2.75	15	3.50	27	3.12
Officer Suggested Sites	1	0.23	2	0.47	3	0.35
<i>Regulation 18 Consultation including Issues and Options (Joint Local Plan)</i>	47	10.76	49	11.45	96	11.10
<i>Green Belt Preferred Options Consultation</i>	22	5.03	25	5.84	47	5.43
<i>Green Belt Preferred Options – Land Registry Searches</i>	26	5.95	15	3.50	41	4.74
<b>Total</b>	<b>437</b>	<b>100</b>	<b>428</b>	<b>100</b>	<b>865</b>	<b>100</b>

\* Site Nominations put forward outside of the Call for Sites Consultation: the Councils were still accepting site nominations to be tested as part of the Local Plan process outside of the formal Local Plan consultations. Organisations or individuals wishing to nominate sites should contact the Councils for a nomination form: [planningpolicy@chiltern.gov.uk](mailto:planningpolicy@chiltern.gov.uk) or [ldf@southbucks.gov.uk](mailto:ldf@southbucks.gov.uk)

### Site Exclusion Criteria at Stage 1

46. Following the identification of the sites, an initial desktop review was carried out to sift out those sites which should be excluded from the assessment. A key purpose of this review is to reduce the need to assess sites later on in the process which are, in principle, unacceptable. The reasons for sites being excluded are set out in Table 3.

Table 3: Sites Excluded at Stage 1

<b>Category</b>	<b>Reason for exclusion</b>
Sites less than <b>five dwellings (net)</b> or under <b>0.25ha/500sqm</b> <sup>17</sup> of economic development floor space	Exclusion at these thresholds of housing and economic development is in accordance with the NPPG. Sites of less than 5 dwellings will be included as part of a windfall assessment for housing.  Site capacity was assessed initially using a standard density of 50 dwellings per hectare (dph) for town centre sites <sup>18</sup> and 30 dph for all other areas. The methodology allows for these densities to be adjusted as the site goes through the assessment process provided that the reason for this adjustment is clearly set out in the HELAA report.
Not <b>within or adjoining a settlement</b> , or a <b>PDL site</b>	Only sites within or adjoining an existing settlement' or PDL sites will be considered as part of the assessment.
Ongoing <b>Employment sites</b> that are not recommended for release	The suitability of existing employment sites will be considered as part of an Employment Land Review. This will consider whether existing employment sites are still suitable. Where sites are identified as being suitable for alternative uses, these will be considered in the HELAA for housing or mixed use.
<b>Sites within the Green Belt which are not on PDL</b>	The NPPF identifies these sites should only be developed in very special circumstances. Any site currently within the Green Belt <sup>19</sup> , have been identified as being unsuitable at this stage.
<b>Environmental Constraints</b>	
Sites within <b>functional flood plains</b> will not be considered for housing or economic development purposes.	Land that is in flood zones 3a and 3b proposed for residential development or zone 3b for economic development will not be included in the HELAA unless it can be demonstrated, through a planning application, that satisfactory mitigation measures can be put in place.

<sup>17</sup> As set out in the NPPG - 3-010-20140306

<sup>18</sup> As town centres are not specifically defined within the Adopted Development Plans (Local Plans and Core Strategies) for the Districts, town centre areas for the settlements are taken as equating to those shown on the Policies map for Chiltern District (adopted November 2011) as the District and Local Shopping Areas and the town centres of Primary Settlements, defined in the Local Plan, Core Strategy and Policies map for South Bucks District (Policy 'TC1' Areas). Sites within or adjoining these areas will be assessed on the basis of an initial 50 dwellings per hectare.

<sup>19</sup> It is not the role of the HELAA to assess the Green Belt purposes of a site, nor to consider sites which are exceptions to the principle against development in the Green Belt.

<b>Sites of Special Scientific Interest</b>	These are important, statutorily protected biodiversity resources used for recreational, amenity and educational purposes in the Districts.
<b>Special Areas of Conservation</b>	These are strictly protected sites designated under the EC Habitats Directive
<b>Special Protection Area</b>	These are strictly protected sites designated under the EC Birds Directive
<b>Scheduled Ancient Monuments and Ancient Woodlands</b>	These are irreplaceable historical assets and are protected by law.
<b>Designated Local Green Spaces</b>	The NPPF states that these sites rule out new development other than in very special circumstances.

47. In accordance with the Joint HELAA Methodology, initially the January 2016 version of the draft HELAA only included sites within all settlements not washed over by the Green Belt, together with sites in the Green Belt comprising previously developed land. Sites/areas recommended for release in the Green Belt Development Options Appraisal (see Section 4) have been carried forward to Stage 2.
48. Appendix 2 (separate document) sets out the sites that were excluded at the Stage 1 and the reasons for this. **243** sites in Chiltern and **304** sites in South Bucks were excluded from the HELAA at the end of Stage 1. These sites have a collective land area of 3003.8 hectares, (1,183.5 hectares in Chiltern and 1,820.3 in South Bucks). **Appendix 3** (separate document) contains maps showing the results of Stage 1.

## **Stage 2 – Site/ Broad Location Assessment**

49. Stage 2 of the assessment process involved assessing whether the 312 sites carried forward from Stage 1 were:
- **'suitable'** for the type of development proposed considering land uses, constraints and other factors;
  - **'available'** based on the best information at hand that there weren't any insurmountable issues with the site and that it was expected that the site would be able to be developed; and
  - **'achievable'**<sup>20</sup> – this is essentially an initial high level judgement about the economic viability of the site and the ability of a developer to develop it within a particular time period.
50. Information on suitability, availability and achievability of developing the sites was collected and analysed through a combination of desktop assessments, using GIS and a database designed to hold all of this information. Site visits and information submitted by landowners, agents and developers was also held in this database. Existing studies, such as the Employment Site Appraisals were also used to inform the site assessment.
51. To determine whether a site is 'suitable' (in principle) for development, and if so the type and scale of development, was dependent on a number of considerations:
- Location – character and predominant uses within the area, assessed as part of the site visit;
  - Environmental Constraints – flood constraints; biodiversity; listed buildings; designated open spaces; tree preservation orders; and
  - Policy Constraints – AONB; Green Belt; whether the site was a designated employment site (and if so whether it performed strongly).
52. All suitable sites were then assessed (based on the above) to determine the type and capacity of development that could be achieved (if it had not already got planning permission). As per the agreed methodology an initial development density was applied to the developable area, (i.e. area suitable for development such as outside of areas of flood risk or previously developed areas within the Green Belt), with 30 dwellings per hectare (dph) in the urban areas, and 50 dph in town centre locations. Then a more design-led approach was taken to inform the second potential capacity, informed by urban design work, based on the factors above.
53. The lowest of the two capacity figures was then used as the 'lower' range figure and the highest figure as the 'upper' range figure; the idea being that development coming forward within these ranges would be a realistic estimate. In some instances

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<sup>20</sup> Sites deemed not to be suitable or available were not assessed on their achievability

this may show that some sites (particularly previously developed sites in the Green Belt) have a very low 'lower range' capacity.

54. All available information was then used to help ascertain whether a site was 'available' for development, information gathered from the Call for Sites and Local Plan consultations was used here as well as investigating the planning history. Where there was no evidence to suggest that the land owner would support development on the site then it could not be considered available for development.
55. Sites which were both 'suitable and 'available' were then assessed at when they were achievable, i.e. when they are likely to be delivered. Sites fall into 2 categories: 'deliverable' sites (those with a realistic prospect that it will be delivered within 5 years), and 'developable' sites (those available for years 6-10 or where possible for sites unlikely to be developed for 11 years or more).
56. Sites which have been excluded or where it has been assumed that development will be delayed or there is a lack of evidence to support their availability, however they are suitable in principle, may be included at a later updates of the HELAA should additional information become available. These sites are listed in **Appendix 4** (separate document) and **shown in Appendix 5 and 6**.
57. Following Stage 2:
  - In Chiltern **96** of the 193 sites (carried forward from Stage 1) were deemed to be suitable, available and achievable and **97 sites were excluded**; and
  - In South Bucks **70** of the 119 sites (carried forward from Stage 1) were deemed to be suitable, available and achievable and **49 sites were excluded**.
58. The sites deemed suitable and available were assessed on their achievability to determine when they may be brought forward for development; it was determined that within the combined 'pool' of sites 124 sites could be deliverable in the first 5 years, 21 sites could be developed in years 6 to 10 and 20 sites could be delivered beyond 11 years.
59. Table 4 summarises the progress of sites within the HELAA for both Chiltern and South Bucks.

Table 4: Progress of Sites within the HELAA

Progress		Chiltern		South Bucks		Overall		
		Count	%	Count	%	Count	%	
Stage 1	Sites Identified at Stage 1	437	-	428	-	865	-	
	Minus sites Completed since previous version of the HELAA	1		5		6		
	Minus sites Withdrawn	0		0		0		
	a) Resultant sites to consider at Stage 1	436		423		859		
	b) Sites Excluded at Stage 1	243	55.7	304	71.9	547	63.7	of a)
	c) Sites Carried forward into Stage 2	193	44.3	119	28.1	312	36.3	
Stage 2	d) Sites Excluded at Stage 2	97	50.3	49	41.2	146	46.8	of c)
	e) Suitable, Available and Achievable Sites	96	49.7	70	58.8	166	53.2	
	f) Sites achievable within 0-5 years	71	74.0	54	77.1	125	75.3	of e)
	g) Sites achievable within 6-10 years	15	15.6	6	8.6	21	12.7	
	h) Sites achievable beyond 11 years	10	10.4	10	14.3	20	12.0	

60. Tables showing sites assessed at Stage 2 are contained in **Appendix 4** (separate document) and **Appendix 5** shows maps which summarises this information. The delivery of sites deemed suitable, available and achievable are shown in **Appendix 4** and on maps in **Appendix 6** (separate document) which summarises this information.

### **Stage 3 – Windfall Assessment**

61. Windfall sites are sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed land that has unexpectedly become available.<sup>21</sup>
62. The NPPF and NPPG state that, where justified, windfall sites can contribute towards housing supply. There must be realistic evidence to demonstrate that windfall sites will consistently become available.
63. The Joint HELAA Methodology includes windfall sites as being sites with less than 5 dwellings (net). It recommended that each Council assess windfall completions over a ten year period in order to identify past trends. This information is set out in **Appendix 7** (separate document). It should be noted that the definition of windfall changed in June 2010 when residential gardens were specifically excluded from being included as windfall sites. This has meant that the past data has had to be amended in order to exclude garden sites from the overall total.
64. Based on the data collected for the period between 2004/05 and 2015/16, an average allowance **of 55 dwellings per year has been used to predict future delivery within years 4 and beyond**. This will continue to be monitored and if necessary subsequent HELAA figures will be adjusted.
65. The Housing White Paper 'Fixing our broken Housing Market' encourages the delivery of development from smaller sites, and consulted on a potential amendment to the NPPF which requires local authorities to have policies that support the development of windfall sites. Adoption of such a policy in the emerging Local Plan may increase the supply of windfalls during the life of the plan. This will be fully considered in future updates of the HELAA.

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<sup>21</sup> Annex 2 'Windfall' definition of the NPPF (2012)

## **Stage 4 – Assessment Review**

66. The HELAA is an iterative process, Stage 4 of the methodology requires the Councils to review the assessment in order to prepare a trajectory to show whether there is enough available land supply to meet development needs. As the plan target has not been set the Councils are **not in a position to produce a trajectory**.
67. This HELAA will inform the progress on the emerging Local Plan by indicating the amount of the potential unmet need once options in the built-up areas have been tested.
68. The following sections will show the supply for residential, employment and C2 units bringing together the following:
- The Objectively Assessed Need (OAN) as defined in the Housing and Economic Land Availability Assessment (HEDNA);
  - Completions of dwellings, employment floorspace and C2 units from the latest planning permissions monitoring data;
  - Supply of sites resulting from Stage 2 of the HELAA and smaller sites from the latest monitoring data; and
  - For residential development, the likely delivery from windfall sites, as assessed in Stage 3.
69. Tables showing the supply of residential, employment and C2 sites are contained in **Appendix 8** (separate document).

**Residential**

70. The latest HEDNA indicates that there is a need for additional **14,900** homes approximately **677 homes per year**.
71. Since the start of the plan period **489** dwellings (net) have been completed; 265 in Chiltern and 224 in South Bucks. In total this reduces the Objectively Assessed Need (OAN) to **14,411**. Table 5 shows the rate of delivery in the two Districts since the start of the plan period and its effect on the OAN:

Table 5: Dwelling Completions since start of the Plan Period (2014 to 2016)

Period (1 <sup>st</sup> April to 31 <sup>st</sup> March)	Dwellings Complete (net)			Cumulative OAN (Minus Total Completions)
	CDC	SBDC	Total	
2014/15	114	139	253	14,647
2015/16	151	85	236	14,411

72. When considering: sites identified at Stage 2 of the HELAA, sites with planning permission too small to be included in the HELAA, and windfalls (from Stage 3 at 55 dwellings per annum from years 4 onwards) this gives an initial supply of between **4,655 to 5,222** dwellings over the plan period.
73. Table 6 summarises the supply of residential dwellings when considering all the information above.

Table 6: Summary of Supply of Housing and Residual Housing Requirement

<b>a: Objectively Assessed Housing Need (2014 to 2036)</b> <b>Source: Draft HEDNA (December 2016)</b>		<b>14,900</b>	
<b>b: Completions (net) within Plan Period (2014 to 2016)</b>		<b>489</b>	
<b>c: Residual Requirement (a minus b)</b>		<b>14,411</b>	
<b>d: Deliverable Supply - Net Dwellings (below)</b>			
<b>0 to 5 Years</b>	Sites without Planning Permission	117	206
	Large Sites under construction (including Prior Approvals)	900	
	Large Sites with Unimplemented Planning Permission (including Prior Approvals)	1,237	
	Small Sites Under Construction (including Prior Approvals)	182	
	Small Sites with Unimplemented Planning Permission (including Prior Approvals)	377	
	Allowance for Windfalls from years 4 and 5 (at 55 dwellings per annum X 2 years)	110	
	<b>Total</b>	<b>Lower</b> <b>2,923</b>	<b>Upper</b> <b>3,012</b>
<b>6 to 10 Years</b>	Sites without Planning Permission	159	220
	Unimplemented Planning Permission (including Prior Approvals)	31	
	Plan Allocations (Sites identified in the Development Plan without Planning Permission)	350	
	Allowance for Windfalls from years 6 to 10 (at 55 dwellings per annum X 5 years)	275	
	<b>Total</b>	<b>Lower</b> <b>815</b>	<b>Upper</b> <b>876</b>
<b>11+ Years</b>	All HELAA Sites Beyond 11 Years	367	784
	Allowance for Windfalls from years 11 to 2036 (at 55 dwellings per annum X 10 years)	550	
	<b>Total</b>	<b>Lower</b> <b>917</b>	<b>Upper</b> <b>1,334</b>
<b>TOTAL</b>		<b>4,655</b>	<b>5,222</b>
<b>e: Residual Requirement (c minus d)</b>		<b>9,756</b>	<b>9,189</b>

## Employment

74. The latest HEDNA, published in December 2016, indicates that there is a need for additional **55,070** square meters of floorspace which equates to **9.7 hectares** of land in all **B use class employment use** (more details in Table 7).

Table 7: Employment Land Requirements

	Chiltern		South Bucks <sup>22</sup>	
	Sqm	Hectares	Sqm	Hectares
<b>B1a/b Office and R&amp;D</b>	+15,490	+3.1	+33,000	+7
<b>B1c/B2 Industrial</b>	-15,060	- 3.8	-19,400	-5
<b>B8 Warehousing</b>	+2,140	+0.4	+38,900	+8
<b>Total</b>	+2,570	+0.3	+52,500	+10

(Source: HEDNA December 2016, Figures 104 and 107) (Revised - see footnote 22)

75. Table 8: identifies the amount of B use class floorspace completed since the start of the plan period.

Table 8: Employment Completions since start of the Plan Period (2014 to 2016)

Floorspace Completions (net)		B1a	B1b	B1c	B2	B8	Total
<b>CDC</b>	2014/15	-4,322	0	2,319	-169	-2,419	-4,591
	2015/16	-4,847	0	0	516	-295	-4,626
<b>SBDC</b>	2014/15	-5,710.5	0	0	0	0	450
	2015/16	5,914.5	0	0	0	0	0
<b>Total</b>	2014/15	-10,032.5	0	2,319	-169	-2,419	-4,141
	2015/16	1,067.5	0	0	516	-295	-4,626

76. The residual requirement once applying the completions within the plan period against the HEDNA requirement is indicated below:

- **57,455** square meters of **B1a/b** floorspace;
- **-37,126** square meters of **B1c/B2** floorspace; and
- **43,754** square meters of **B8** floorspace.

77.

78. Table 9 summarises the residual floorspace requirements when factoring the above in with the supply sites in Stage 2 of the HELAA and sites with planning permission for sites too small to be included in the HELAA.

<sup>22</sup> The revision relates to South Bucks figures: the figures relating to floorspace demand in 2036 were erroneously based on 2033 figures; the corrected figures are shown in Table 7.

Table 9: Summary of Supply of Employment Floorspace (sqm) and Residual Requirement

		B1a	B1b	B1c	B2	B8	Total
<b>a: Objectively Assessed Need (2014 to 2036) - Source: Draft HEDNA (December 2016)</b>		48,490		-34,460		41,040	55,070
<b>b: Completions (net) within Plan Period (2014 to 2016)</b>		-8,965	0	2,319	347	-2,714	-9,013
<b>c: Residual Requirement (a minus b)</b>		57,455		-37,126		43,754	64,083
<b>d: Deliverable Supply - Net Floorspace (below)</b>							
<b>0 to 5 Years</b>	Sites without Planning Permission	10,000	0	0	0	0	10,000
	Large Sites Under Construction (including Prior Approvals)	-1,517	-844	771	0	22,354	20,764
	Large Sites with Unimplemented Planning Permission (including Prior Approvals)	-15,905	0	1,419	936	664	-12,886
	Outstanding Supply from Small Sites	-3,103	-348	-2,546	-739	1,088	-5,647
	<b>Total</b>	<b>-10,525</b>	<b>-1,192</b>	<b>-356</b>	<b>197</b>	<b>24,106</b>	<b>12,231</b>
<b>6 to 10 Years</b>	Sites without Planning Permission	28,250	6,850	-3,800	0	0	31,300
	<b>Total</b>	<b>28,250</b>	<b>6,850</b>	<b>-3,800</b>	<b>0</b>	<b>0</b>	<b>31,300</b>
<b>All HELAA Sites Beyond 11 Years</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>TOTAL</b>		<b>17,726</b>	<b>5,658</b>	<b>-4,156</b>	<b>197</b>	<b>24,106</b>	<b>43,531</b>
<b>Summarised</b>		<b>23,384</b>		<b>-3959</b>		<b>24,106</b>	
<b>e: Residual Requirement (c minus d)</b>		<b>34,072</b>		<b>-33,167</b>		<b>19,648</b>	<b>20,552</b>

79. Please note; the above figures do not include development at Pinewood Studios; this is because the scale of the studios and nature of the employment would give a distorted view on the general supply of employment floorspace throughout the Districts.

Table 10: Net Gain in Floorspace (sqm) on Extant Planning Permissions relating to Pinewood Studios (not included above)

Permission	B1a	B2	SG
14/00608/REM	11,490.75	0	926
14/01992/REM (Larger Redevelopment)	16,259	13,274	15,820

### C2 Units

80. The latest HEDNA, published in December 2016, indicates that there is a need for additional **850** institutional or **C2 accommodation units**, 410 in Chiltern and 440 in South Bucks.
81. Table 11 shows that only **76** C2 units have been recorded as complete since the start of the plan period. Although there are no recorded completions in the 2015/16 period there remains a significant number of sites with extant planning permission, which have already been implemented.

Table 11: C2 Unit Completions since start of the Plan Period (2014 to 2016)

Period (1 <sup>st</sup> April to 31 <sup>st</sup> March)	Dwellings Complete (net)			Cumulative OAN (Minus Total Completions)
	CDC	SBDC	Total	
2014/15	76	0	76	774
2015/16	0	0	0	744

82. Table 12 summarises the residual C2 requirement when factoring the above in with the supply sites in Stage 2 of the HELAA and sites with planning permission for sites too small to be included in the HELAA.

Table 12: Summary of Supply of C2 Supply and Residual Requirement

<b>a: Objectively Assessed Need (2014 to 2036) - Source: Draft HEDNA (Jan 2016)</b>		<b>850</b>
<b>b: Completions within Plan Period (2014 to 2016)</b>		<b>76</b>
<b>c: Residual Need</b>		<b>774</b>
<b>d: Deliverable Supply - Net C2 Units (below)</b>		
<b>0 to 5 Years</b>	Sites without Planning Permission	0
	Large Sites Under Construction	252
	Large Sites with Unimplemented Planning Permission	109
	Small Sites Under Construction	40
	Small Sites with Unimplemented Planning Permission	-38
	<b>Total</b>	<b>363</b>
<b>6 to 10 Years</b>	Sites without Planning Permission	45
	<b>Total</b>	<b>45</b>
<b>TOTAL</b>		<b>408</b>
<b>e: Residual Requirement (c minus d)</b>		<b>366</b>

### Conclusion

83. In order to demonstrate that all available opportunities to accommodate development in the built-up areas and previously developed land in the Green Belt have been explored the Councils have carried out an interim update of the HELAA following the agreed methodology.
84. Stage 1 and 2 of the HELAA update identified the sites where development is likely to come forward within the next 5, 6 to 10 and 11 years and beyond. Stage 3 analysed the historic delivery of windfall sites within the Districts.
85. The results from Stages 1 through to 3 were then reviewed against the latest information involving planning completions and monitoring information to provide residual requirements for housing, employment and C2 units, against the objectively assessed need (identified in the Housing and Economic Development Needs Assessment – HEDNA) as shown in Table 13.

Table 13: Summary of Requirements

<b>Residential Requirements (dwellings) (net)</b>				
OAN (HEDNA)	14,900			
Residual	9,756 (Lower Range)	9,189 (Upper Range)		
<b>Employment Requirements (sqm) (net)</b>				
	B1a/b	B1c/B2	B8	Total
OAN (HEDNA)	48,490	-34,460	41,040	55,070
Residual	34,072	-33,167	19,648	20,552
<b>C2 Units Requirements (units) (net)</b>				
OAN (HEDNA)	850			
Residual	366			

86. The figures above show that there is insufficient supply to meet the objectively assessed need (OAN) for development set out in the Housing and Economic Development Needs Assessment (HEDNA). As per the methodology set out in the NPPG, this can however be used to assist the Councils through the duty to co-operate when exploring options within the Housing Market Area to meet the OAN.
87. There is a need to review this position once more information is available and the plan is progressed further. As stated earlier, in the absence of a plan target the Councils cannot produce a trajectory so therefore the HELAA cannot be fully completed (i.e. progressed to Stage 5) where it is considered a 'final' evidence base document.
88. Once the position on unmet needs has been formally agreed within the Housing Market Area subsequent updates of the HELAA will use the supply figure to establish a trajectory. This will be published in subsequent versions of the HELAA.

89. Further updates of the HELAA will be published when the Councils progress the evidence base of the emerging Local Plan. In order to ensure that the HELAA is up to date the Councils will carry out further actions and consider any updates in national policy. In order to progress and update the HELAA the Councils will:

- Continue to work with neighbouring authorities in order to identify opportunities to meet the objectively assessed needs of the housing market area and establish the proportion of unmet need to be met elsewhere within the Housing Market Area in order to set a plan target for Chiltern and South Bucks;
- Consider the implications of changes to Government Policies following the General Election, implications of the Housing White Paper, and future regional infrastructure projects such as the Oxford to Cambridge Expressway;
- Consideration of any land identified in the Brownfield Registers of both Councils and whether existing HELAA sites are eligible on the registers (Regulations for Permission in Principle for land on the Brownfield Register come into effect on 16<sup>th</sup> April 2017);
- Consideration of emerging evidence base yet to be completed such as the Employment land and town centre development opportunities assessments;
- Update the base date to 31<sup>st</sup> March 2017 (currently 2016) to include new permissions, completions and expiries from the 16/17 monitoring period (due to take place in June 2017);
- Consider any additional publically owned sites coming forward and update of existing publically owned sites' availability and delivery (where appropriate) following correspondence with other public agencies and housing associations - the Councils have contacted other public bodies and Housing Associations in order to establish whether they are currently or have scope to review their current estates portfolio in the Districts with a view to incorporating any potential sites within the HELAA, (expected June/July);
- Include sites/options emerging from the updated Green Belt Part 2 Assessment taking account of additional options put forward as part of the Green Belt Preferred Options Consultation;
- If it is proposed to remove settlements from the Green Belt as part of the emerging Local Plan, sites within these settlements will be considered;
- Identify and contact land owners on sites which have been deemed suitable, but not available due to lack of information;
- Determining the 5 Year Housing Land Supply position for both authorities based on the Objectively Assessed Housing Need (OAHN) and agreed unmet housing need position to be accommodated elsewhere;

- Prepare a housing trajectory taking account of the evidence base work on housing lead in times and delivery rates for major sites; and
- Exploring opportunities through Estates Renewal with local registered landlords, although it is expected that any opportunities will be long-term and may fall outside of the plan period.