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Chalfont St Peter Parish Council (CSPPC)

Chiltern and South Bucks Local Plan 2036 Examination

Matter 2 - Objectively Assessed Housing and Employment Needs



Issue 1 – Housing Needs

1. In response to the *Inspectors' Initial Questions* the Councils confirmed that the Plan should have a strategic policy which sets out the housing requirement and how this need will be met. Is a Main Modification required for effectiveness and consistency with paragraph 20 of the Framework?

1.1. Yes. As set out in our Matter 3 statement and expressed in our previous statements, the Parish Council (PC) considers that the submitted Local Plan does not set out a coherent spatial strategy and strategic policies that meet the requirement of Paragraph 20 of the NPPF for: *“strategic policies should set out an overall strategy for the pattern, scale and quality of development”*. This should include a strategic policy setting out the housing requirement and how this need will be met. This is essential to ensure clarity for decision-makers, the community, infrastructure providers and landowners/ developers in terms of how much housing is required, and where it will be provided.

2. In determining the housing requirement, has the Local Housing Need ('LHN') assessment been carried out correctly, and conducted using the standard method as required by the Framework and the PPG?

2.1. Para. 60 of the NPPF states that *“to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”*

2.2. In line with this, the Councils' HEDNA (2019, **CSBLP26**) establishes the local housing need for the area, as per the NPPF. The PC is content with the methodology used within the HEDNA (2019, **CSBLP26**), including the decision to develop the baseline through applying CLG 2014-based household projections, as in accordance with the PPG (Ref.-ID: 2a-005-20190220, para.:005), which states *“the 2014-based household projections*



are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes."

3. Where plans cover more than one area, the PPG states that it will be for the relevant strategic policy-making authority to distribute the total housing requirement across the plan area. How have the LHN assessments for Chiltern and South Bucks been distributed across the plan area? How was this decided?

3.1. The HEDNA (2019, **CSBLP26**) has established separate local housing need figures for Chiltern and South Bucks. The HEDNA (2019, **CSBLP26**) found that the minimum local housing need is 6,600 homes in Chiltern and 8,660 homes in South Bucks. The PC is satisfied with this approach.

3.2. The Councils state the following *"given the highly constrained nature of the two districts (88% of Chiltern, 87% of South Bucks is Green Belt and 72% of Chiltern District falls within the Chilterns AONB. Within South Bucks district, Burnham Beeches is also a protected area), these designations mean there are limited development alternative options open to the two councils."* The PC therefore notes that the Councils have concluded that they are unable to accommodate all of the local housing need in Chiltern and South Bucks and requested assistance from Aylesbury Vale District Council and Wycombe District Council to accommodate CDC/ SBDC's unmet housing needs.

3.3. However, as noted in our Matter 3 statement, the Parish Council considers there is scope to intensify existing sites and update and review the Brownfield Land Register. The PC considers this as a key flaw of the HELAA (2020, **CSBLP19**) and SA Update (2020, **CSBLP9**), as the spatial options did not consider other alternatives such as increasing provision within and adjoining the existing urban areas, see Figure 1 below from the SA Update (2020, **CSBLP9**).



Table 1: Spatial Options assessed in the Regulation 19 SA Report

Spatial Option	Description
Spatial Option A	Do nothing.
Spatial Option B	Export all unmet housing need to Aylesbury and develop all suitable commitments.
Spatial Option C	Meet partial housing need set out in the Standard Methodology over the plan period (2016-2036) including using commitments and all suitable HELAA sites and exporting remaining unmet housing need to the Vale of Aylesbury.
Spatial Option D	Meet the housing need set out in the Standard Methodology over the plan period (2016-2036) including using all sources and include additional Green Belt Strategic Options releases as necessary (Exceptional Circumstances), and all suitable HELAA sites, and exporting remaining unmet housing need to the Vale of Aylesbury.

- In addition to these options it is also helpful to consider the sustainability performance of a fifth spatial option, Option E, as set out in **Table 2** below.

Table 2: Spatial Option assessed in this report

Spatial Option	Description
Spatial Option E	Housing need set out in the Standard Methodology over the plan period (2016 - 2036) to be met within the Chiltern and South Bucks Plan area.

Figure 1) SA Update (2019) – five spatial options for Chiltern and South Bucks

3.4. The PC considers that this demonstrates that the distribution of the LHN across the Plan area has not been robustly based on the assessment of reasonable alternatives, such as the intensification of existing sites or the potential for more brownfield sites in order to reduce the dependency on Green Belt Strategic Options. It also demonstrates that account has not been taken of the evidence in terms of the constraints on development and the impacts to ensure that growth is distributed where it is needed whilst protecting areas or assets of national importance as defined by Footnote 6 of Paragraph 11 of the NPPF - such as the Green Belt.

4. How has the LHN figure been translated into a housing requirement for the Plan period? For effectiveness and consistency with paragraph 65 of



the Framework, should the Plan include a specific policy setting out the housing requirement for the whole plan area?

4.1. The PC is satisfied with the Councils' approach to establishing local housing need. The PC notes that the local housing need figures are directly translated into the housing requirement for the joint Local Plan area.

4.2. In response to the second question raised, the PC considers it irresponsible of the Councils' to not have included clear spatial strategy policies within the submitted Local Plan that set out the housing requirement for the whole Plan area. Given that this is a joint Local Plan, it is crucial for the Plan to clearly highlight where development has been allocated to ensure this correlates with local need. As such, the PC considers that the emerging Local Plan is contrary to para.65 of the NPPF.

5. The PPG states that the standard method can be used to calculate the *minimum* annual local housing need figure. Should the housing requirement be expressed as a minimum, and is it a gross or net figure?

5.1. CDC/SBDC should respond to this question.

6. The PPG also states that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. It confirms that there will be circumstances where it is appropriate to consider whether the actual housing need is higher than the standard method indicates. Have the Councils considered whether the need for housing is higher in Chiltern and South Bucks, having particular regard to issues around affordability? How have these considerations informed the plan-making process?

6.1. The PC is satisfied with the approach taken to establishing the local housing need figure for Chiltern and South Bucks. Please see our response to Issue 2 – Question 3 below for our comments on the latter half of this question.



7. What is the justification for including an additional 10% to account for the potential non-delivery of homes from the Vale of Aylesbury Local Plan?

7.1. The Parish Council is unclear of the basis for the provision of an additional 10% or 1,526 dwellings in the Chilterns and South Bucks Local Plan to account for the potential non-delivery of homes from the Vale of Aylesbury Local Plan (VALP).

7.2. It would appear that 10% is an allowance included in the VALP but the inclusion of such an allowance raises questions as to whether allocations in the VALP are deliverable in that Plan. However, this should be a matter for the VALP not the Chilterns and South Bucks Local Plan. In addition, it seems illogical for Chiltern and South Bucks to have stated that they could not meet their Local Housing Need by 4,161 dwellings and then to increase this by 10% due to non-delivery in the 'receiving' authority.

7.3. Furthermore, if a non-delivery allowance is considered appropriate, surely it should be 10% of the LHN shortfall to be provided in Aylesbury Vale, i.e. 416 dwellings rather than 10% of the total LHN in Chiltern and South Bucks.

8. Does the Plan set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations, as required by paragraph 65 of the Framework?

8.1. A fundamental flaw of the submitted Local Plan relates to the distribution of the housing requirement. As stipulated in para.65 of the NPPF, *"within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations."* The Local Plan simply lists these sites in Appendix LP1, as shown in Figure 2 below. The PC's main concern is that there is no evidence to support the housing requirement in each neighbourhood, nor the vast sum of homes allocated in areas such as Chalfont St Peter. Based on this, the PC considers that Appendix LP1 is unjustified and therefore contrary to para.35b of the NPPF.



5.12 Appendix LP1 - Housing Supply

Designated Neighbourhood Plan Areas

Designated Neighbourhood Areas	Potential Housing Numbers from HELAA Sites
Burnham	3 sites: 114 dwellings
Chalfont St Giles	2 sites: 5 dwellings
Chalfont St Peter	8 sites: 516 dwellings
Denham	1 site: 224 dwellings
Farnham	3 sites: 19 dwellings
Fulmer	1 site: 45 C2 units
Gerrards Cross	12 sites: 174 dwellings
Hedgerly	None
Iver	8 sites: 223 dwellings
Seer Green	None
Taplow	12 sites: 345 dwellings (Also 17 Affordable Housing)

Figure 2) Appendix LP1 of the Chiltern and South Bucks emerging Local Plan

Issue 2 - Affordable Housing Needs

1. What is the annual net need for affordable housing? For clarity to decision- makers, developers and local communities, and consistency with the Framework, should the need for affordable housing be set out in a strategic policy?

1.1. As stated within para. 5.4.2 of the submitted Local Plan, the HEDNA (2019, **CSBLP26**) estimates that the annual need for affordable housing within Chiltern and South Bucks is 270 homes per annum, equating to 4,320 homes over the Plan period. It should be noted that the affordable housing requirements is only included within the supporting text for Policy DM LP2 (Homes – Affordable Homes from Major Developments) and is not explicitly set out within the policy itself. The subsequent paragraph (5.4.3) clarifies that the Vale of Aylesbury could provide up to 1,040 affordable homes within their Plan area, leaving 3,300 affordable homes to be delivered within the CDC/SBDC emerging Local Plan.

1.2. The PC is concerned that the affordable housing figure does not match other figures within supporting documents. For example, para.103 of the



Affordable Housing Paper (2019) states that *“there is substantial need for new affordable housing within the area, as evidenced by the HEDNA 2019 which demonstrates the need for 4,251 affordable homes over the plan period (213 per annum).”* The PC requests that further clarity is given on this matter.

1.3. Para.20 of the NPPF states the following *“strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for: a) housing (including affordable housing), employment, retail, leisure and other commercial development [...]”*. Given that the Local Plan has neglected to include a strategic policy on affordable housing, the PC considers that the submitted Local Plan’s set of discordant policies are incapable of being delivered. Based on the above, the emerging Plan is contrary to national policy and is therefore considered unsound.

1.4. The PC supports greater clarity on affordable housing in the form of a strategic policy in the Plan, and expects that the Councils will support such a policy in the light of the following statement (sourced from the CSB Response to Inspectors’ Questions, 2019) *“6.2 [...] the Councils recognise that they have erred in not setting this out in Policy SP LP1. The Councils decided not to submit proposed modifications but await the relevant hearing sessions to propose modifications, so that all parties can review the Councils hearing statements. To this end the Councils have also requested that the Inspectors make recommendations on these and such other modifications to make the Plan sound”*.

2. Has the affordable housing need been correctly established, and is it based on up-to-date information? How does it compare to the LHN?

2.1. Please see our response to Q3 below. As to whether the information is up-to-date, the PC notes that Table 3 below (in Issue 2 Question 3) demonstrating the potential provision of affordable housing in Chiltern and South Bucks, was based on the Councils’ position in April 2019. The PC considers that this table should be updated given that there is likely now to be more certainty regarding ‘soft’ commitments within the housing trajectory, i.e. sites with outline planning permission.



3. What is the justification for requiring at least 40% affordable housing on qualifying sites? What is this based on, how was it calculated and what alternatives were considered?

3.1. Policy DM LP2 (Homes – Affordable Homes from Major Developments) of the emerging Local Plan states that *“planning permission will be granted for residential development provided that the minimum percentages of affordable homes are delivered: sites allocated in the Plan - 40%, non-allocated sites with a capacity of 10 or more homes or an area of 0.25% hectares or more – 40%, non-allocated sites with a capacity of 5 or more homes or an area of 0.12 hectares or more (inside the AONB) – 40%”*. This figure is markedly higher than that set out in Paragraph 64 of the NPPF.

3.2. This divergence from national policy requirements is partially justified within para.109 of the Affordable Housing Topic Paper (2019), as it states that *“this target recognises that some sites will not qualify for affordable housing and some will face viability challenges. However, the target will ensure those sites that are capable of delivering, for example those released from the Green Belt, are able to do so.”* Para. 110 continues *“the significant historic under-provision of affordable housing is also evident from acute indicators of housing need across both districts, including rising homelessness and temporary accommodation, and relatively long waiting times for families on the Councils’ waiting lists to access affordable homes.”*

3.3. Table 1 below clearly shows that the affordable housing target figures exceeds the affordable housing need. Whilst the PC welcomes the Councils’ optimistic approach to affordable housing delivery, the PC also question whether this is entirely feasible, given the market-oriented nature of development and the historic market evidence for the area.



Source	All Housing	Potential/target provision of AH	Justification
VALP supply for CSB	4,161	1,040	25% AH target in VALP
GB Strategic Sites	5,200	2,080	40% proposed LP target
Hard Commitments	930	372	40% proposed LP target
<i>Soft Commitments</i>	71	0	<i>Uncertain</i>
HELAA	2,029	812	40% proposed LP target
<i>Windfall</i>	450	0	<i>Majority below site size threshold</i>
Total	12,841	4,304	Equates to 33.5% of total identified supply of homes
<i>Remainder</i>	<i>2,419</i>	<i>0</i>	<i>As yet unidentified supply</i>
Local Plan Requirement	15,260	4,251	HEDNA estimate of AH need

(Source: Chiltern and South Bucks Housing Trajectory for 2016-2036 – for Chiltern and South Bucks Local Plan – Position April 2019)

Table 1) Affordable Housing Topic Paper (2019) – Potential provision of affordable housing in Chiltern and South Bucks

3.4. In relation to affordable housing delivery on Green Belt ‘Strategic Sites’ the Parish Council notes that there are inconsistencies with the Councils’ assumptions. Specifically, in relation to para.64 of the NPPF which states:

“Exemptions to this 10% requirement should also be made where the site or proposed development:

- *provides solely for Build to Rent homes;*
- *provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students);*
- *is proposed to be developed by people who wish to build or commission their own homes; or*
- *is exclusively for affordable housing, an entry-level exception site or a rural exception site.”*

3.5. Given that Site SP BP7 (North East) in Chalfont St Peter is allocated for “approximately 360 homes (250 market and affordable homes and 110 retirements homes)”, the site is eligible for exemption, as per the NPPF. Whilst the PC is satisfied with the affordable housing targets in the submitted Local Plan, detailed justification as to why the emerging Local Plan vastly differs from policies within the NPPF is required from the Councils’.

4. How does this compare to the identified need?



4.1. Please see our response to Issue 2 - Question 3 above.

Issue 3 – Employment Needs

- 1. In determining the need for employment land over the plan period, how has the Council considered:**
 - **Employment forecasts and projections (labour demand);**
 - **Demographic assessments of future needs (labour supply);**
 - **Past take-up of employment land, for general industrial purposes and strategic warehousing; and**
 - **Consultation with relevant organisations and local business groups?**
- 2. Based on the answers to Question 2, how much additional employment land is required over the plan period?**
- 3. Should the Plan set out the requirement for employment land in the same way as it does for housing?**
- 4. In planning to deliver 56,000 square metres of economic floorspace is Policy SP EP4 justified and positively prepared? How does it relate to the figures in paragraph 6.6.7 of the submitted Plan?**
- 5. How does this take into account the availability of employment land elsewhere within the functional economic market area?**

5.1. The PC does not wish to comment on Issue 3.