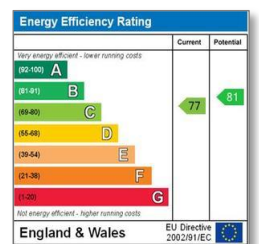




Buckinghamshire

Housing and Economic Development Needs Assessment 2016

Study Appendices
December 2016





Opinion Research Services | The Strand, Swansea SA1 1AF
Jonathan Lee | David Harrison | Nigel Moore
enquiries: 01792 535300 · info@ors.org.uk · www.ors.org.uk



Atkins | Euston Tower, 286 Euston Road NW1 3AT
Richard Ainsley
enquiries: 020 7121 2280 · richard.ainsley@atkinsglobal.com · www.atkinsglobal.com

© Copyright December 2016

Contents

Appendix A.....	4
List of Property Agents Consulted	4
Appendix B.....	5
Stakeholder workshop meeting notes.....	5
Appendix C.....	9
Site Reconnaissance	9
Appendix D	14
Experian and Trend-based scenarios	14
Appendix E	35
Proportion of employment in each sector requiring B use class floorspace	35
Appendix F	38
Sites with 1,000 sq. m or more of Net gain or loss of B-class Employment Floorspace	38
Appendix G	42
Consultation Responses	42

Appendix A:

List of Property Agents Consulted

Property market agents that contributed to the analysis include:

- Stupples Chandler Gravey
- Brown & Lee Clifford Billings
- Philip Marsh Collins Deung Limited
- Brown & Co
- Dove Properties
- Deriaz Slater

Appendix B:

Stakeholder workshop meeting notes

Project:	Buckinghamshire Economic Development Needs Assessment Stakeholder Workshop	
Date and time:	19 th May 2015 (10am-12.30am)	
Meeting place:	The Hub, High Wycombe	
Present:	Richard Ainsley Zoe Green Ilias Drivylas Charlotte Morris Charlotte Stevens Judith Orr Chris Schmidt-Reid Ian Barham Steven Walford Mal Hussain Ronnie Flemming Tim Warrell Paul Deriaz Linda Walton	Atkins Atkins Atkins Wycombe District Council Aylesbury Vale District Council Chiltern District Council Wycombe District Council Buckinghamshire Thames Valley LEP Buckinghamshire County Council Aylesbury Vale District Council Groundwork South (Thames Valley Area) Dove Properties Deriaz Slater Federation of Small Businesses

The following provides a summary of the key points of discussion raised at the Bucks Economic Needs workshop.

Supply Side Issues

Geography

- FEMA already defined in previous study (consisting of Aylesbury Vale, Wycombe and Chiltern Districts, with a sub-area for Aylesbury Town).
- Geographical areas influencing the FEMA economy - Milton Keynes, Oxfordshire, Cambridgeshire, and London 'the golden triangle', also Slough, Maidenhead. East-West rail link will improve connectivity, but there is still more investment in transport required.
- Constraints on development – Green belt, Topography of land (hills in Wycombe), limited transport connectivity, AONB.

Site Allocations

- Aylesbury Vale – have a number of safeguarded employment sites, however local agents considered that many of these sites are not suitable for development for employment uses (given

their locations which lack transport connections and other services / facilities). Aston Clinton MDA – has not yet been brought forward for development. However, economic development officers at Aylesbury Vale District Council are discussing options with the site owners.

- Sites need to be allocated in the right locations (along key transport corridors) and with supporting infrastructure (adequate road access).
- Some sites are part of a wider mixed use scheme and often developers are not willing to bring forward delivery of the employment component of the scheme (as playing a waiting game) often they argue employment use is not viable.
- Micro businesses struggle to find suitable premises for expansion/growth. This either constrains growth or leads to them relocating elsewhere.
- Chiltern and Wycombe – no land for B8 use class growth, generally more constrained than Aylesbury Vale but have better transport connections, whereas Aylesbury Vale is less constrained but poorer transport connections. Supply-driven equation – if you provide supply then development will follow.
- Lots of land allocated for grandiose B1 use class (head-quarters type accommodation) (e.g. Silverstone development site) but there are very few spec B1 use class headquarter developments going ahead across the country let alone Bucks.

Business requirements

- Most of the demand for employment premises comes from existing local businesses wanting to expand rather than businesses wanting to move in from outside the area.
- Large businesses considering moving into the area not only need an appropriate site but need good housing, retail, services, safety for their employees – quality of life/ ‘soft factors’.
- Skills shortage – the area has a highly skilled and qualified population (high proportion with degrees) but qualified young people tend to move elsewhere, primarily London or commute out for work. This leads to skill gaps. Universities and colleges need to be providing the right training courses to support the growing economic sectors in the FEMA. homes
- Broadband connectivity is important for businesses but the level of connectivity does vary considerably across the area.
- Older premises are not meeting the needs of local businesses that need flexible modern style accommodation. Local businesses are not able to expand. For example, locally based business ‘The Entertainer’ – based in Amersham. 30 year old business employs middle/senior-level staff that commute long distances as they can’t get the right skilled staff locally. The business has succeeded in expanding its operations (by developing a national distribution centre), but this addition to their stock is located further out in Banbury (250,000 sq. ft.) as there was not this type of suitable accommodation available locally.
- Transport infrastructure constraints affect development potential. Access to dual carriageways / strategic transport routes are key to unlocking development sites.
- Qualitative characteristics of sites are important – quantity may be available but not necessarily right quality/location/type.
- Vacancy rates vary, with pockets of high vacancy rates in locations which are less attractive for employment. In particular Aylesbury Vale has areas of older premises which are not so attractive.

Other pressures / issues

- Permitted Development Rights (PDRs) are affecting the office supply and difficult to predict which sites will be affected. Viable office-based businesses are being displaced for residential conversion. Some fully occupied premises are under pressure, and some are removing their tenants e.g. Offices in Marlow and Tring.

- Employment land also under pressure from housing development as residential land values are typically higher than commercial. Some of the larger sites designated for employment uses may have issues on viability for employment development.
- Institutional finance a problem for seed bed development as their lending / investment criteria are increasing all the time to bigger lot sizes.
- Finance for infrastructure is also an issue.
- There is a high proportion of start-ups in the area and people working from home.
- The area is the heart of small start -up businesses and this should be supported, perhaps there is too much of a hankering for big businesses.
- Biggest challenge is providing suitable accommodation for businesses making the move from 'home working' to small units. Multi-tenancies for lots of small units on a site are inefficient when compared to one large tenancy.
- 'Seed-bed' units proven very successful e.g. Cressex, High Wycombe. More of these types of sites are needed.
- Big infrastructure investments imposed on the FEMA could have significant effects, such as dualling the carriageway of the A421 could have a transformative effect on the north of the FEMA connecting Buckingham to Milton Keynes and Bicester.
- A41 Eastern Link Road around Aylesbury will improve connectivity to the north of the FEMA. A proposal which would deliver the north east element of this linkage has been refused and is being fought at appeal
- Need to make more of innovation potential of the area – through better links with universities.

Demand Side Issues

Market demand

- Office growth – little demand for large HQ offices.
- Steady stream of demand for industrial premises – particularly modern / flexible accommodation

Plot ratios

- Plot ratios are largely determined by car parking. Offices with no parking are more difficult to let/sell. Many people do long commutes by car as in many cases it is not possible to travel by public transport or cycling. Therefore parking space is essential – this pushes down plot ratios.
- Small and large scale developments – different plot ratios. Town centre / rural location also affects plot ratios.
- County Council moving away from policy of capping parking. Developments must provide sufficient ("just enough") parking. This policy approach will need to be confirmed with the Local Authorities
- Employment densities for offices are getting higher as businesses try to cut costs and more flexible working meaning companies are able to get greater efficiencies out of floorspace.

Sectors

- Manufacturing could revive if Brexit happens (this does not seem to take into account that many international companies locate in Britain because they view it as their entry point to Europe).
- Manufacturing decline could be halted if sufficient supply of B2 floorspace is provided.
- Want to attract high value / high growth sectors (high value engineering, tech, aerospace engineering, pharma)
- Lack of local skills for high value/advanced manufacturing.

- Forecasts are showing significant growth in B8 in the area but past trends show a decline in B8 employment. Not a surprise as limited supply of land for B8.
- Does the area want B8 as they have few employees? Some smaller B8 units do actually have very intense labour supply – particularly internet based industries where there is a lot of picking and packing employment.
- Good example of B1 development is at Chalfont St Peter, new development that is now fully occupied.

Other Issues

- External factors are influencing the FEMA – e.g. supply chain opportunities from the growth of Luton Airport.
- Economic strategy / vision needs to guide employment land policies – what can / does Buckinghamshire want to do support.
- Should there be a focus on certain sectors at certain business parks / employment areas. There is precedent for this – creative industries and motorsports engineering.
- A common message is needed from Buckinghamshire that it is a place to do business, the LEPs are a good starting point.

Appendix C:

Site Reconnaissance

We undertook an assessment of some of the larger employment sites in the FEMA with a view to considering whether there were opportunities for additional employment land in existing employment sites and allocations. This work will help inform the HELAAs that each local authority is currently undertaking.

This exercise involved rapid visitations to a limited number of sites that were agreed with the three Buckinghamshire councils. The sites were selected on the basis of the following criteria:

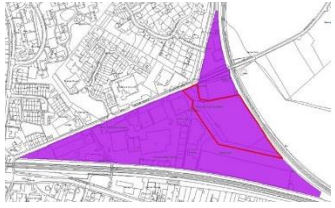


- Sites of strategic importance for the FEMA
- Considerable size (more than 5 ha)
- Identified for B class employment uses (existing site / future allocation within evidence base documents etc.)
- Capacity for B class employment uses (can be as part of a mixed use development)
- Site that could come forward within the Study period (could provide short/medium/long term opportunities)



The site reconnaissance assessments have helped to identify opportunities for future employment supply (see chapter 6). Further details of the site reconnaissance work are included in Appendix C. Key findings from the reconnaissance assessments are:


- Aylesbury Vale – Has a number of key sites where new employment floorspace can be developed. These fall into two categories: there are large greenfield opportunity sites (Aston Clinton MDA, Arla and Aston 41, Berryfields, Silverstone) most of which currently have planning permission; and there are existing employment sites with opportunity sites which have planning permission (such as Gatehouse Industrial area, Haddenham Business Park and Long Crendon Industrial Estate).
- Chiltern – Has a limited range of sites that could come forward for employment floorspace. Of the two sites visited only Asheridge Road has the opportunity for further development, where a large cleared site is ready for redevelopment. Asheridge Road industrial estate is in good condition and has some recent development that has come forward suggesting the site remains attractive to the market.
- Wycombe - Has a number of key sites where new employment floorspace can be developed. These include: greenfield opportunity sites (Abbey Barn, Gomm Valley reserve sites); existing employment sites with opportunity sites (Globe Park, Princes Estate, Sands Industrial Estate and Wycombe Air Park). None of the opportunities identified at existing industrial estates have planning permission, most are longer term opportunities as they will require redevelopment of existing employment premises, whilst the opportunity at Princes Estate is an immediate opportunity as the land is cleared and being marketed. The reserve sites are poor in terms of access and location. The district lacks a good supply of shorter term opportunities in accessible locations.

Site Reconnaissance

Our ref	Site Name	District	Assessment	Opportunities	Opportunity Location
1	Haddenham Business Park	Aylesbury Vale	Well occupied, units in good condition. Well laid out good servicing and access. Two opportunities cleared / scrub land	Site has planning permission for B class development	N/A
2	Westcott Venture Park (Westcott)	Aylesbury Vale	Could not access - security controlled and owner would not agree permission to enter.	N/A	N/A
3	Gatehouse Industrial Area (Aylesbury)	Aylesbury Vale	Some opportunities opposite AVDC council offices. Derelict / vacant and underutilised site on the corner of gatehouse road and gatehouse close. Longer term opportunity could be the BT site on Griffin Lane. Some of site has been converted to residential	Site has planning permission for B class development	N/A
4	Aston Clinton Road Major Development Area	Aylesbury Vale	Large greenfield site, good strategic road access (A41 to M1). A little isolated away from T/C and services	Site has planning permission for B class development	N/A
5	Berryfields, Aylesbury off A41 (Aylesbury)	Aylesbury Vale	Large scale residential development. Area north of station flagged for employment. It will be important to get a view from agents on what demand would be like in this area. Good access off A road and good rail access. Very few facilities nearby.	Site has planning permission for B class development	N/A
6	ARLA (Aston Clinton)	Aylesbury Vale	Dairy built out and operational. Land available for warehouse / distribution uses. Good location for these uses given the access to strategic road network.	Site has planning permission for B class development	N/A
7	Aston 41, College Road North, Aylesbury, Bucks,	Aylesbury Vale	Greenfield land marketed for new production / warehouse units (Savills / LSH). Has outline consent. Good	Site has planning permission for B class development	N/A

Our ref	Site Name	District	Assessment	Opportunities	Opportunity Location
			location given access to strategic road network.		
8	Long Crendon Industrial Park (Long Crendon)	Aylesbury Vale	Well occupied, well laid out and modern. Some very new units. Two opportunity areas. 1 to the north is cleared / greenfield. The other is boarded up. Most units in good condition some may be upgraded over time (e.g. Corner Drakes Drive & Hikers Way)	Site has planning permission for B class development	N/A
9	Raans Road	Chiltern	In reasonable condition, well occupied.	1.3 ha of opportunity for development.	
10	Asheridge Road	Chiltern	Good quality business park / industrial estate, some modern units recently built. Large vacant site available. Whilst there are some vacant units on site, these are likely to be occupied in the near future, as they are of a good quality.	Cleared site , covering 2.6 ha	 / B2 / B8
11	Globe Park (Marlow) (Southern Wycombe)	Wycombe	Fairly well occupied. Lots of new units being developed (high quality offices - Meridian and Medina) and some new units that have been occupied Globeside. 1 redevelopment opportunities (vacant boarded up buildings)	Some disused buildings in poor condition	 B1 c / B2 / B8
12	Abbey Barn (reserve site)	Wycombe	Greenfield site. Access would need to be addressed for the site. The location is relatively isolated, Potentially less attractive for B1a.	N/A	N/A

Our ref	Site Name	District	Assessment	Opportunities	Opportunity Location
13	Gomm Valley (reserve site)	Wycombe	Access seems very poor, narrow road and weak bridge. Unlikely to meet market demands.	N/A	
14	Undeveloped land at Princes Estate, Princes Risborough	Wycombe	One large vacant parcel of land that is being marketed by LSH (2.3ha). The rest of the site is quite new, good quality and well occupied (B1a / B1b)	2.2ha of vacant land for identified for development.	 B1a/B1b
15	Sands Industrial Estate (High Wycombe)	Wycombe	Large scale industrial estate which is built at quite a high density. One derelict unit could be redeveloped. There are also two areas with poorer quality units that could be redeveloped medium term to provide new floorspace.	Redevelopment opportunity for some of the derelict buildings.	 B1 c / B2 / B8
16	Knaves Beech – Jn3 M40 (High Wycombe)	Wycombe	1 vacancy on boundary road. Area is losing B class floorspace to retail and other uses. Some good quality B1a and storage and distribution units. Fully built out and no scope for redevelopment, or opportunity land.	N/A	N/A
17	Soho Mills Industrial Estate / Wooburn Industrial Park (Southern Wycombe)	Wycombe	Well occupied industrial estate. 1 large vacant unit warehouse / industrial building. Some old units but well occupied. Probably will be upgraded overtime, but no short / medium term redevelopment opportunities while occupied.	N/A	N/A

Our ref	Site Name	District	Assessment	Opportunities	Opportunity Location
18	Wycombe Air Park (High Wycombe)	Wycombe	Used predominantly as an airfield. There are industrial premises on the site which are fair to poor quality and the land is underutilised. Subject to the airfields needs a comprehensive redevelopment could take place. Providing better quality and more floorspace.	Comprehensive redevelopment of the area currently occupied by business premises.	 Suited to B1 / B2 / B8
19	Gomm Road/Tannery Road Industrial Estate (High Wycombe)	Wycombe	No scope for change, also predominantly retail and trade units.	N/A	N/A
20	Swan Frontage, High Wycombe	Wycombe		1 ha of development opportunity identified by Wycombe District Council	N/A

Appendix D:

Experian and Trend-based scenarios

Aylesbury Vale

Aylesbury Vale Scenario 1 – Experian projections

According to Experian's forecasts, full time equivalent employment (FTE) across all sectors in Aylesbury Vale is forecast to increase from 59,900 FTEs in 2013 to approximately 72,000 FTEs in 2033, an increase of approximately 20% (Table D-1).

According to Experian's forecasts, key growth sectors (in terms of absolute increase in FTE employment) will include Administrative & Supportive Services, Wholesale, Professional Services, and Health. The most notable decline is projected to take place in the Public Administration & Defence sector, followed by Metal Products (manufacture of).

Table D-1 Aylesbury Vale Experian employment forecasts (FTEs) – sectors showing significant numerical changes in employment

Sector	Change 2013-2033	% change 2013-2033
Administrative & Supportive Services	+2,200	+38%
Wholesale	+2,100	+36%
Professional Services	+1,800	+38%
Health	+1,400	+30%
Residential Care & Social Work	+1,100	+37%
Construction of Buildings	+1,000	+125%
Metal Products (manufacture of)	-300	-43%
Public Administration & Defence	-400	-11%
All sectors	+12,100	+20%

Source: Experian

The number of FTEs in B use class sectors is forecast to increase from 29,070 in 2013 to 35,150 in 2033, an increase of approximately 21% (Table D-2). Employment in B1a/b sectors is forecast to increase by approximately 4,440 FTE jobs between 2013 and 2033, which equates to an increase of 21%. Employment growth in the B8 sector is projected to be lower in absolute terms but the rate of growth is projected to be higher, at 28%. The B1c/B2 sectors are forecast to experience the lowest absolute and percentage employment growth, of 200 FTEs (an increase of 5%) between 2013 and 2033.

Table D-2 Aylesbury Vale Experian employment forecasts (FTEs) – B use class sectors

Use class	2013	2033	Change 2013-2033	% change 2013-2033
B1a/b	21,620	26,060	+4,440	+21%
B1c/B2	4,210	4,410	+200	+5%
B8	5,000	6,380	+1,380	+28%
Total B use class	30,830	36,850	+6,020	+20%

Source: Experian, Atkins

Based on the above employment forecasts and the employment density and plot ratio assumptions summarised in Chapter 6, Aylesbury Vale's floorspace and land requirements over the period 2013-2033 are summarised in Table D-3 and Table D-4 below.

Table D-3 Aylesbury Vale B use class floorspace need (square metres) – Scenario 1

Use class	2013	2033	Change 2013-2033
B1a/b	259,000	313,000	+53,000
B1c/B2	168,000	176,000	+8,000
B8	350,000	447,000	+97,000
Total B use class	778,000	936,000	+158,000

Source: Experian, Atkins

Table D-4 Aylesbury Vale B use class land need (hectares) – Scenario 1

Use class	2013	2033	Change 2013-2033
B1a/b	52	63	+11
B1c/B2	42	44	+2
B8	70	89	+19
Total B use class	164	196	+32

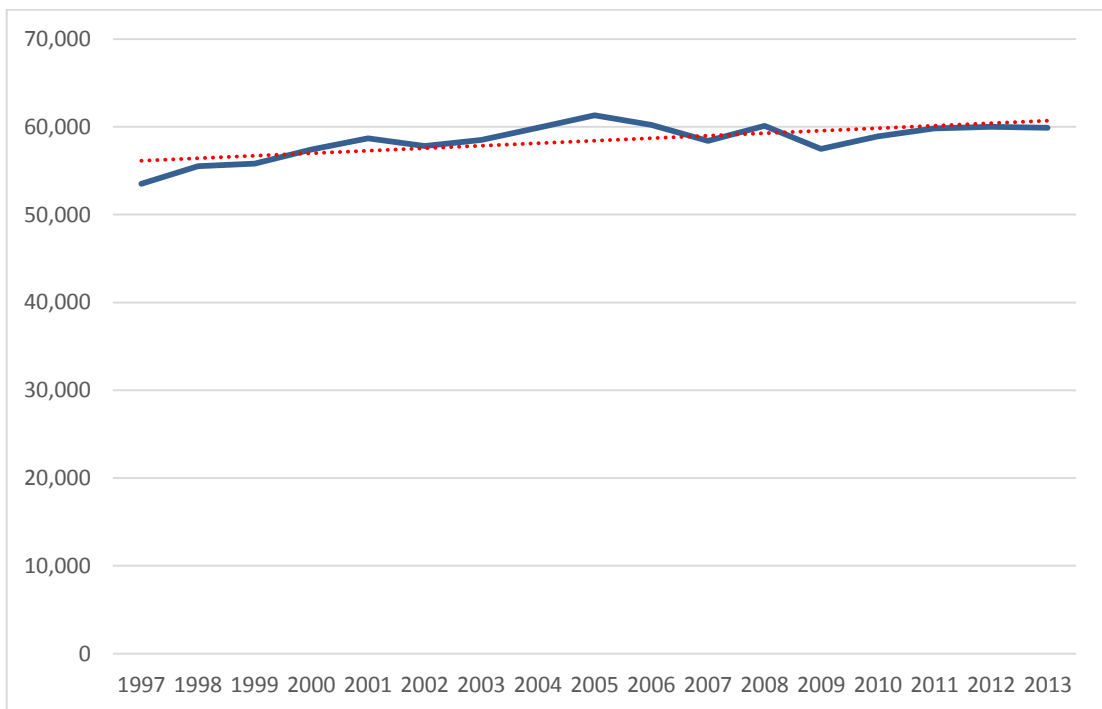
Source: Experian, Atkins

According to the Experian-based scenario, Aylesbury Vale will face additional land requirements for all types of B use classes over the period to 2033, totalling 32 hectares. B8 will account for the majority of this additional need (approximately 19 hectares).

Aylesbury Vale Scenario 3 – Trend-based projections

Scenario 3 is a trend-based scenario based on Aylesbury Vale's historical employment growth levels between 1997 and 2013. Figure D-1 illustrates, there have been some fluctuations in the number of FTE jobs over that period but there is a clearly positive trend line over time.

Figure D-1 Aylesbury Vale FTE employment 1997-2013¹



Source: Experian

In total, employment grew by 6,400 FTE jobs over the period 1997-2013, representing growth of approximately 12% (Table D-5). Key growth sectors over that period included Professional Services, Administrative & Supportive Services, and Health. The greatest decline (in absolute terms) took place across various Manufacturing sub-sectors and Insurance & Pensions.

¹ The red dotted line shows the linear trend for FTE employment and the blue line shows the historic trend for FTE employment over the period 1997 to 2013.

Table D-5 Aylesbury Vale FTE employment – sectors showing significant numerical changes in employment

Sector	Change 1997-2013	% change 1997-2013
Professional Services	+2,600	+124%
Administrative & Supportive Services	+2,300	+66%
Health	+1,400	+42%
Residential Care & Social Work	+900	+43%
Computing & Information Sciences	+700	+70%
Agriculture, Forestry & Fishing	-500	-33%
Manufacturing of Printing and Recorded Media (manufacture of)	-600	-67%
Insurance & Pensions	-900	-69%
Other Manufacturing	-900	-60%
Pharmaceuticals (manufacture of)	-1000	-100%
All sectors	+6,650	+12%

Source: Experian

The projection of these historical trends to 2033 suggests further employment growth in B1a/b sectors and further decline in B1c/B2 and B8 sectors (Table D-6).

Table D-6 Aylesbury Vale trend-based employment projections (FTEs) – B use class sectors

Use class	2013	2033	Change 2013-2033	% change 2013-2033
B1a/b	21,620	30,300	+8,680	+40%
B1c/B2	4,210	2,730	-1,480	-35%
B8	5,000	4,110	-890	-18%
Total B use class	30,830	37,140	+6,310	+20%

Source: Experian, Atkins

Under Scenario 3, B1a/b floorspace demand is projected to increase by some 105,000 square metres over the period 2013-2033, while demand for B1c/B2 and B8 floorspace is projected to decrease by 59,000 and 62,000 square metres respectively (Table D-7).

Table D-7 Aylesbury Vale B use class floorspace need (square metres) – Scenario 3

Use class	2013	2033	Change 2013-2033
B1a/b	259,000	364,000	+105,000
B1c/B2	168,000	109,000	-59,000
B8	350,000	288,000	-62,000
Total B use class	777,000	761,000	-16,000

Source: Experian, Atkins

The above floorspace requirements translate into an indicative need for 21 hectares of additional B1a/b land over the period 2013-2033 (Table D-8). The decreasing need for B1c/B2

and B8 land however would theoretically result in a surplus of approximately 27 hectares of industrial and warehousing land.

Table D-8 Aylesbury Vale B use class land need (hectares) – Scenario 3

Use class	2013	2033	Change 2013-2033
B1a/b	52	73	+21
B1c/B2	42	27	-15
B8	70	58	-12
Total B use class	164	158	-6

Source: Experian, Atkins

Chiltern

Chiltern Scenario 1 – Experian projections

According to Experian’s forecasts, full time equivalent employment (FTE) across all sectors in Chiltern is forecast to increase from 27,900 FTEs in 2014 to approximately 31,700 FTEs in 2036, an increase of approximately 14% (Table D-9).

According to Experian’s forecasts, key growth sectors (in terms of absolute number of jobs) will include Professional Services, Construction, and Finance. The most notable decline is projected to take place in Wholesale and in Administrative & Supportive Services.

Table D-9 Chiltern Experian employment forecasts (FTEs) –sectors showing significant numerical changes in employment

Sector	Change 2014-2036	% change 2014-2036
Professional Services	+2,300	+61%
Construction of Buildings	+700	+100%
Finance	+600	+86%
Specialised Construction Activities	+600	+67%
Accommodation & Food Services	+500	+31%
Pharmaceuticals (manufacture of)	-200	-25%
Administrative & Supportive Services	-400	-29%
Wholesale	-900	-31%
All sectors	3,800	14%

Source: Experian

The number of FTEs in B use class sectors is forecast to increase from 13,310 in 2014 to 15,710 in 2036, an increase of approximately 18% (Table D-10). Employment in B1a/b sectors is forecast to increase by approximately 3,050 FTE jobs between 2014 and 2036, which equates to an increase of 30%. Employment in B1c/B2 and B8 sectors is projected to decline by 20% each.

Table D-10 Chiltern Experian employment forecasts (FTEs) – B use class sectors

Use class	2014	2036	Change	% change
-----------	------	------	--------	----------

			2014-2036	2014-2036
B1a/b	10,040	13,090	+3,050	+30%
B1c/B2	1,410	1,130	-280	-20%
B8	1,860	1,490	-370	-20%
Total B use class	13,310	15,710	+2,400	+18%

Source: Experian, Atkins

Based on the above employment forecasts, Chiltern is projected to need approximately 37,000 square metres of additional B1a/b floorspace by 2036 (Table D-11), which translates to indicative demand for 7 additional hectares of B1a/b land (Table D-12).

Table D-11 Chiltern B use class floorspace need (square metres) – Scenario 1

Use class	2014	2036	Change 2014-2036
B1a/b	121,000	157,000	+37,000
B1c/B2	56,000	45,000	-11,000
B8	130,000	104,000	-26,000
Total B use class	307,080	306,580	-500

Source: Experian, Atkins

Table D-12 Chiltern B use class land need (hectares) – Scenario 1

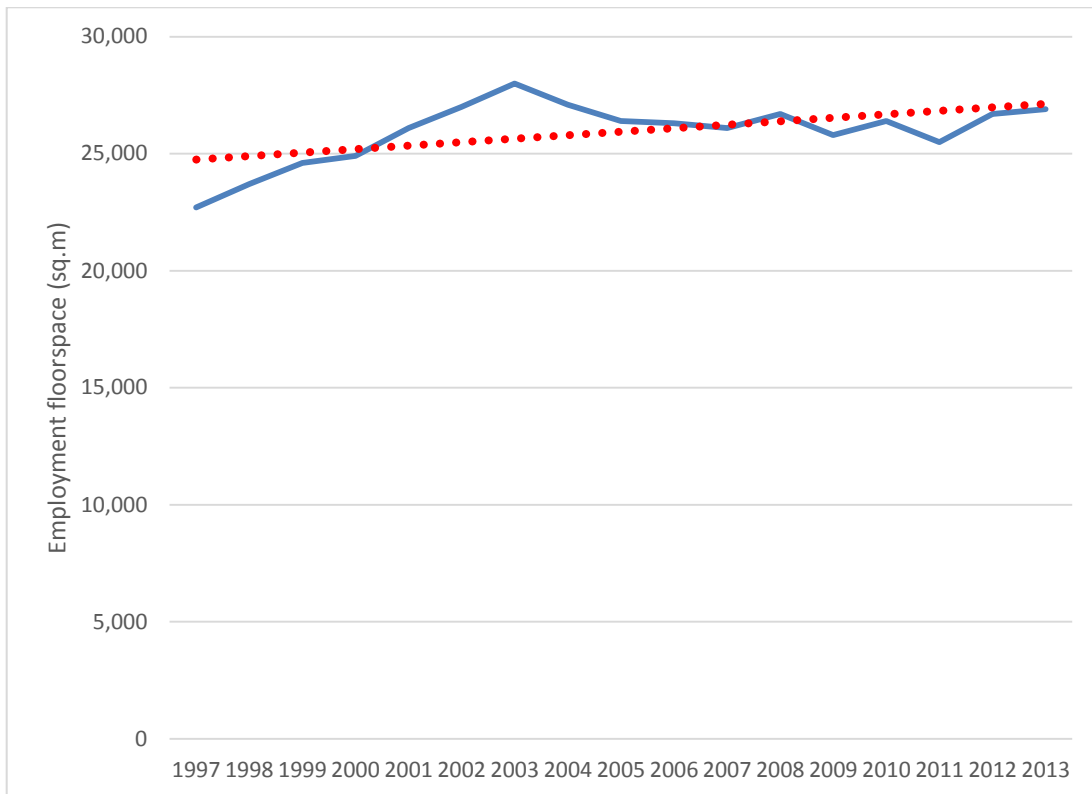
Use class	2014	2036	Change 2014-2036
B1a/b	24	31	+7
B1c/B2	14	11	-3
B8	26	21	-5
Total B use class	64	64	-1

Source: Experian, Atkins

Chiltern Scenario 3 – Trend-based projections

Scenario 3 is a trend-based scenario based on Chiltern’s historical employment growth levels between 1997 and 2013 (Figure D-2).

Figure D-2 Chiltern FTE employment 1997-2013²



Source: Experian

In total, employment grew by approximately 4,200 FTE jobs over the period 1997-2013, representing growth of approximately 19% (Table D-13). Key growth sectors over that period included Professional Services, Computing & Information Services, Education, and Health. The greatest decline (in absolute terms) took place across the various Manufacturing sub-sectors and Wholesale.

² The red dotted line shows the linear trend for FTE employment and the blue line shows the historic trend for FTE employment over the period 1997 to 2013.

Table D-13 Chiltern FTE employment –sectors showing significant numerical changes in employment

Sector	Change 1997-2013	% change 1997-2013
Professional Services	+1,800	+113%
Computing & Information Services	+700	+117%
Education	+700	+30%
Health	+500	+45%
Residential Care & Social Work	+400	+29%
Retail	+400	+20%
Administrative & Supportive Services	-200	-13%
Agriculture, Forestry & Fishing	-200	-50%
Other Manufacturing	-200	-40%
Other Private Services	-200	-20%
Wholesale	-400	-13%
All sectors	+4,200	+19%

Source: Experian

The projection of these historical trends to 2036 suggests further employment growth in B1a/b sectors and further decline in B1c/B2 and B8 sectors (Table D-14).

Table D-14 Chiltern trend-based employment projections (FTEs) – B use class sectors

Use class	2014	2036	Change 2014-2036	% change 2014-2036
B1a/b	10,020	13,810	+3,790	+38%
B1c/B2	1,620	1,150	-470	-29%
B8	1,620	1,100	-520	-32%
Total B use class	13,260	16,060	+2,800	+21%

Source: Experian, Atkins

Under Scenario 3, B1a/b floorspace demand is projected to increase by some 46,000 square metres over the period 2014-2036, while demand for B1c/B2 and B8 floorspace is projected to decrease by 19,000 and 36,000 square metres respectively (Table D-15).

Table D-15 Chiltern B use class floorspace need (square metres) – Scenario 3

Use class	2014	2036	Change 2014-2036
B1a/b	120,000	166,000	+46,000
B1c/B2	65,000	46,000	-19,000
B8	113,000	77,000	-36,000
Total B use class	298,000	289,000	-9,000

Source: Experian, Atkins

The above floorspace requirements translate into an indicative need for 9 hectares of additional B1a/b land over the period 2014-2036 (Table D-16).

Table D-16 Chiltern B use class land need (hectares) – Scenario 3

Use class	2014	2036	Change 2014-2036
B1a/b	24	33	+9
B1c/B2	16	11	-5
B8	23	15	-7
Total B use class	63	60	-3

Source: Experian, Atkins

Wycombe

Wycombe Scenario 1 – Experian projections

According to Experian’s forecasts, full time equivalent employment (FTE) across all sectors in Wycombe is forecast to increase from 69,700 FTEs in 2013 to approximately 80,800 FTEs in 2033, an increase of approximately 13% (Table D-17).

According to Experian’s forecasts, key growth sectors (in terms of absolute number of jobs) will include Wholesale, Accommodation & Food Services, and Health. The greatest decline is projected to take place in Computer & Electronic Products (manufacture of) and Public Administration & Defence.

Table D-17 Wycombe Experian employment forecasts (FTEs) –sectors with significant numerical change in employment

Sector	Change 2013-2033	% change 2013-2033
Wholesale	+1,700	+19%
Accommodation & Food Services	+1,500	+42%
Construction of Buildings	+1,500	+107%
Health	+1,400	+37%
Residential Care & Social Work	+1,300	+54%
Specialised Construction Activities	+1,200	+44%
Finance	-400	-29%
Public Administration & Defence	-400	-24%
Computer & Electronic Products (manufacture of)	-1,100	-58%
All sectors	+9,100	+13%

Source: Experian

The number of FTEs in B use class sectors is forecast to increase from 36,620 in 2013 to 38,150 in 2033, an increase of approximately 4% (Table D-18). Employment in B1a/b sectors is forecast to increase by approximately 1,300 FTE jobs between 2013 and 2033, which equates to an increase of 5%. Employment in B8 sectors is forecast to grow by 21% while industrial B1c/B2 employment is projected to decline by 22% over the same period.

Table D-18 Wycombe Experian employment forecasts (FTEs) – B use class sectors

Use class	2013	2033	Change 2013-2033	% change 2013-2033
B1a/b	25,360	26,660	+1,300	+5%
B1c/B2	4,890	3,800	-1,090	-22%
B8	6,370	7,690	+1,320	+21%
Total B use class	36,620	38,150	+1,530	+4%

Source: Experian, Atkins

Based on the above employment forecasts, Wycombe is projected to need some 16,000 square metres of additional B1a/b floorspace by 2033 and an additional 92,000 square metres of B8 floorspace (Table D-19). B1c/B2 floorspace requirements are projected to decrease by 44,000 square metres.

Table D-19 Wycombe B use class floorspace need (square metres) – Scenario 1

Use class	2013	2033	Change 2013-2033
B1a/b	304,000	320,000	+16,000
B1c/B2	196,000	152,000	-44,000
B8	446,000	538,000	+92,000
Total B use class	946,000	1,010,000	+64,000

Source: Experian, Atkins

The above translate into indicative need for 3 additional hectares of B1a/b land and 18 hectares of B8 land (Table D-20).

Table D-20 Wycombe B use class land need (hectares) – Scenario 1

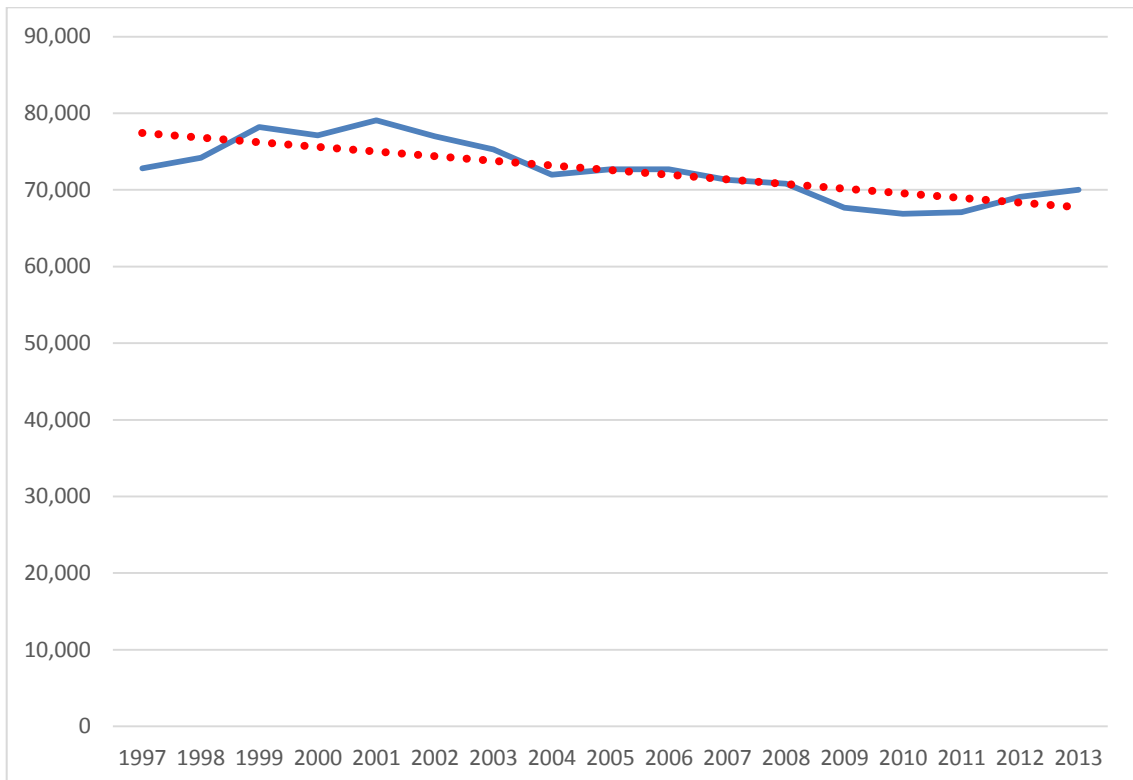
Use class	2013	2033	Change 2013-2033
B1a/b	61	64	+3
B1c/B2	49	38	-11
B8	89	108	+18
Total B use class	199	210	+11

Source: Experian, Atkins

Wycombe Scenario 3 – Trend-based projections

Scenario 3 is a trend-based scenario based on Wycombe's historical employment growth levels between 1997 and 2013. As Figure D-3 illustrates, employment numbers peaked in 2001, and there is a clear downward sloping trend throughout the period.

Figure D-3 Wycombe FTE employment 1997-2013³



Source: Experian

In total, employment declined by approximately 2,800 FTE jobs over the period 1997-2013, representing a decrease of approximately 4% (Table D-21). Key growth sectors over that period included Health, Specialised Construction Activities, and Computing & Information Services. The greatest decline (in absolute terms) took place across the various Manufacturing sub-sectors, and Administrative & Supportive Services.

³ The red dotted line shows the linear trend for FTE employment and the blue line shows the historic trend for FTE employment over the period 1997 to 2013.

Table D-21 Wycombe FTE employment – sectors with significant numerical change in employment

Sector	Change 1997-2013	% change 1997-2013
Health	+1,300	+52%
Specialised Construction Activities	+1,200	+80%
Computing & Information Services	+1,100	+33%
Real Estate	+1,000	+250%
Residential Care & Social Work	+800	+50%
Computer & Electronic Products (manufacture of)	-1,200	-39%
Wholesale	-1,400	-14%
Administrative & Supportive Services	-1,500	-22%
Other Manufacturing	-1,800	-62%
Machinery & Equipment (manufacture of)	-2,300	-96%
All sectors	-2,800	-4%

Source: Experian

The projection of these historical trends to 2033 suggests decline across all B use class sectors (Table D-22). In total, B use class employment is projected to decline by nearly 10,000 FTE jobs between 2013 and 2033.

Table D-22 Wycombe trend-based employment projections (FTEs) – B use class sectors

Use class	2013	2033	Change 2013-2033	% change 2013-2033
B1a/b	25,360	21,340	-4,020	-16%
B1c/B2	4,890	1,320	-3,570	-73%
B8	6,370	4,450	-1,920	-30%
Total B use class	36,620	27,110	-9,510	-26%

Source: Experian, Atkins

The above employment projections translate into declining floorspace and land requirements across all B use classes (Table D-23 and Table D-24). Scenario 3 suggests that Wycombe's employment land requirements between 2013 and 2033 would decrease by a total of 72 hectares.

Table D-23 Wycombe B use class floorspace need (square metres) – Scenario 3

Use class	2013	2033	Change 2013-2033
B1a/b	304,000	256,000	-48,000
B1c/B2	196,000	53,000	-143,000
B8	446,000	311,000	-135,000
Total B use class	946,000	620,000	-326,000

Source: Experian, Atkins

Table D-24 Wycombe B use class land need (hectares) – Scenario 3

Use class	2013	2033	Change 2013-2033
B1a/b	61	51	-10
B1c/B2	49	13	-36
B8	89	62	-27
Total B use class	199	127	-72

Source: Experian, Atkins

These trend-based projections should be treated with caution however as it is unlikely that Wycombe will have such high levels of surplus B use class land by 2033. This is for several reasons. First, there is general consensus that the sharp decline in manufacturing activity that has taken place in previous years is expected to slow down. In fact, several high value manufacturing sub-sectors (e.g. advanced engineering and manufacturing) are seeing a resurgence across the UK.

Second, the above figures do not take into account any loss of existing employment land that may take place over the assessment period. In reality, it is highly unlikely that all of Wycombe's existing employment sites will still be in B-class use in 2033. The government's permitted development rights policies enabling B1 and B8 to residential conversions and the policy emphasis on re-using brownfield land for new housing developments is expected to lead to further losses of employment land that will need to be replaced.

While the trend-based projections provide useful context for forecasting future economic needs, they need to be considered alongside the findings of the other scenarios tested as part of this assessment.

South Bucks

South Bucks Scenario 1 – Experian projections

The Experian forecasts predict that FTE employment in South Bucks is due to grow from 30,600 in 2014 to 36,400 in 2035. This is extrapolated to 36,700 by 2036. This represents a total increase of 6,100 FTE employees, an increase of 20%.

Forecast FTE employment growth for selected sectors is presented in Table D-25. In terms of absolute numbers, the highest growth sectors are the Residential Care & Social Work, Accommodation and food services, and Wholesale. Land Transport, Storage & Post, Media Activities, and Computing & Information Services are predicted to contract.

Table D-25 South Bucks Experian employment forecasts (FTEs) –sectors with significant numerical change in employment

Sector	Change 2014-2036	% change 2014-2036
Residential Care & Social Work	+1,200	+60%
Accommodation & Food Services	+900	+32%
Wholesale	+900	+21%
Administrative & Supportive Services	+700	+25%
Construction of Buildings	+500	+50%
Transport Equipment (manufacture of)	+500	+63%
Computing & Information Services	-200	-25%
Media Activities	-200	-18%
Land Transport, Storage & Post	-300	-27%
All sectors	+6,100	+20%

Source: Experian

As observed in Table D-26, the number of FTEs in B use class sectors is forecast to increase from 15,660 in 2014 to 17,900 in 2036. This represents an increase of 14%. The largest absolute growth by use class will be in B1a/b sectors, with growth of 1,350 FTE jobs (12% increase). The highest proportional employment growth is to be in B1c/B2 sectors, with 35% employment growth forecast (340 FTEs). B8 sectors experience more modest growth, with an additional 550 FTE jobs (growth of 18%).

Table D-26 South Bucks Experian employment forecasts (FTEs) – B use class sectors

Use class	2014	2036	Change 2014-2036	% change 2014-2036
B1a/b	11,580	12,930	+1,350	+12%
B1c/B2	990	1,330	+340	+34%
B8	3,090	3,640	+550	+18%
Total B use class	15,660	17,900	+2,240	+14%

Source: Experian, Atkins

Based on these employment forecasts, South Bucks is projected to need some 16,000 square metres of additional B1a/b floorspace by 2036 (Table D-27), which translates to indicative demand for 3 additional hectares of B1a/b land (Table D-28).

Table D-27 South Bucks B use class floorspace need (square metres) – Scenario 1

Use class	2014	2036	Change 2014-2036
B1a/b	139,000	155,000	+16,000
B1c/B2	40,000	53,000	+14,000
B8	216,000	255,000	+39,000
Total B use class	395,000	463,000	+68,000

Source: Experian, Atkins

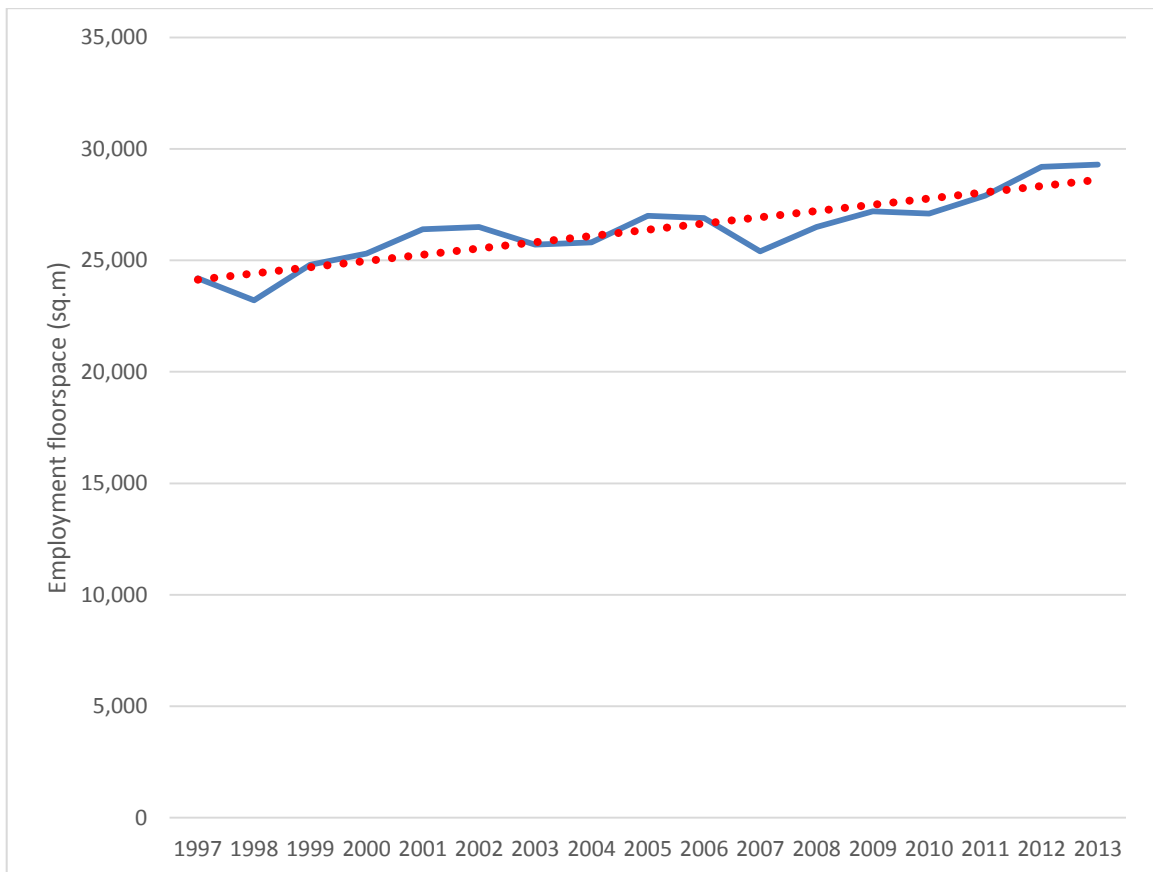
Table D-28 South Bucks B use class land need (hectares) – Scenario 1

Use class	2014	2036	Change 2014-2036
B1a/b	28	31	+3
B1c/B2	10	13	+3
B8	43	51	+8
Total B use class	81	95	+14

Source: Experian, Atkins

South Bucks Scenario 3 – Trend-based projections

Scenario 3 is a trend-based scenario based on South Bucks' historical employment growth levels between 1997 and 2013 (Figure D-4).

Figure D-4 South Bucks FTE employment 1997-2013⁴

Source: Experian

In total, FTE employment grew 21% from 1997 to 2013, or by around 5,100 FTE employees (Table D-29). Key growth sectors over that period included Residential Care & Social Work, Professional Services and Health. Sectors where contraction in FTE employment has been

⁴ The red dotted line shows the linear trend for FTE employment and the blue line shows the historic trend for FTE employment over the period 1997 to 2013.

greatest include Chemicals (manufacture of) and Other Manufacturing, both of which are estimated to have lost 100% of their employment.

Table D-29 South Bucks FTE employment 1997-2013 –sectors showing significant numerical change in employment

Sector	Change 1997-2013	% change 1997-2013
Residential Care & Social Work	+1,400	+233%
Professional Services	+1,100	+42%
Health	+700	+175%
Accommodation & Food Services	+700	+37%
Administrative & Supportive Services	+700	+39%
Chemicals (manufacture of)	-1,000	-100%
Other Manufacturing	-1,000	-100%
All sectors	+5,100	+21%

Source: Experian

The projection of these historical trends to 2036 suggests further employment growth across all sectors (Table D-30). Whilst the B1a/b sectors are projected to gain the greatest number of FTE jobs (3,500), the B1c/B2 sectors are to experience the largest percentage growth (of 100%). Moderate employment growth, of 200 FTEs or 7%, is projected in the B8 sectors.

Table D-30 South Bucks trend-based employment projections (FTEs) – B use class sectors

Use class	2014	2036	Change 2014-2036	% change 2014-2036
B1a/b	11,000	14,500	+3,500	+32%
B1c/B2	900	1,800	+900	+100%
B8	2,900	3,100	+200	+7%
Total B use class	14,800	19,400	+4,600	+31%

Source: Experian, Atkins

As summarised in Table D-31, Scenario 3 predicts the demand for B1a/b floorspace will increase by 41,900 square metres over the period 2014-2036. Demand for B1c/B2 and B8 floorspace will also increase, by 36,000 and 20,000 square metres respectively. Total floorspace demand is forecast to increase by approximately 98,000 square metres.

Table D-31 South Bucks B use class floorspace need (square metres) – Scenario 3

Use class	2014	2036	Change 2014-2036
B1a/b	132,000	174,000	+42,000
B1c/B2	36,000	71,000	+36,000
B8	200,000	221,000	+20,000
Total B use class	368,000	465,000	+98,000

Source: Experian, Atkins

The above floorspace requirements translate into an indicative need for 8 hectares of additional B1a/b land over the period 2014-2036 and a total need of an additional 21 hectares of employment land (Table D-32).

Table D-32 South Bucks B use class land need (hectares) – Scenario 3

Use class	2014	2036	Change 2014-2036
B1a/b	26	35	+8
B1c/B2	9	18	+9
B8	40	44	+4
Total B use class	75	97	+21

Source: Experian, Atkins

FEMA

FEMA Scenario 1 – Experian projections

According to Experian’s forecasts, full time equivalent employment across all sectors in the FEMA is forecast to increase by approximately 32,100 FTE jobs between 2013 and 2033, and a further 3,900 FTE jobs between 2033 and 2036 (Table D-33).

Experian’s forecasts predict that key growth sectors across the FEMA (in terms of absolute number of jobs) will include Professional Services, Wholesale, and Construction of Buildings. Many manufacturing sectors are predicted to contract, as is Public Administration & Defence.

Table D-33 FEMA Experian employment forecasts (FTEs) –sectors with significant numerical changes in employment

Sector	Change 2013-2033	Change 2033-2036
Professional Services	+32,100	+500
Wholesale	+5,700	+400
Construction of Buildings	+4,100	+200
Residential Care & Supportive Services	+3,900	+900
Accommodation & Food Services	+3,600	+400
Health	+3,900	+500
Metal Products (manufacture of)	-600	-100
Public Administration & Defence	-900	+100
Computer & Electronic Products (manufacture of)	-1,100	-100
All sectors	+32,100	+3,900

Source: Experian

The number of FTE employees in B use class sectors is forecast to increase from 95,020 in 2013 to 108,110 in 2036, an increase of approximately 17% (Table D-34). Employment in B1a/b sectors is forecast to increase by approximately 10,860 FTE jobs between 2013 and 2036, which equates to an increase of 16%. Employment in B8 sectors is forecast to grow by 3,210 FTE jobs (+20%) while industrial employment is projected to experience a fall of 8% (980 FTE jobs).

Table D-34 FEMA Experian employment forecasts (FTEs) – B use class sectors

Use class	2013	2033	2036	Change 2013-2033	Change 2033-2036
B1a/b	67,410	78,270	79,270	+10,860	+1,000
B1c/B2	11,570	10,590	10,560	-980	-30
B8	16,040	19,250	19,500	+3,210	+250
Total B use class	95,020	108,110	109,330	+13,090	+1,220

Source: Experian, Atkins

Based on the above employment forecasts, the FEMA is projected to need some 142,000 square metres of additional B1a/b floorspace by 2036 and an additional 242,000 square metres of B8 floorspace (Table D-35). B1c/B2 floorspace requirements are projected to decrease by 40,000 square metres.

Table D-35 FEMA B use class floorspace need (square metres) – Scenario 1

Use class	2013	2033	2036	Change 2013-2033	Change 2033-2036
B1a/b	809,000	939,000	951,000	+130,000	+12,000
B1c/B2	463,000	424,000	422,000	-39,000	-1,200
B8	1,123,000	1,348,000	1,365,000	+225,000	+18,000
Total B use class	2,395,000	2,710,000	2,739,000	+316,000	+28,000

Source: Experian, Atkins

The above floorspace projections translate into indicative need for approximately 28 additional hectares of B1a/b land and 49 hectares of B8 land by 2033 (Table D-36). B1c/B2 land requirements are expected to experience a reduction of 10 hectares.

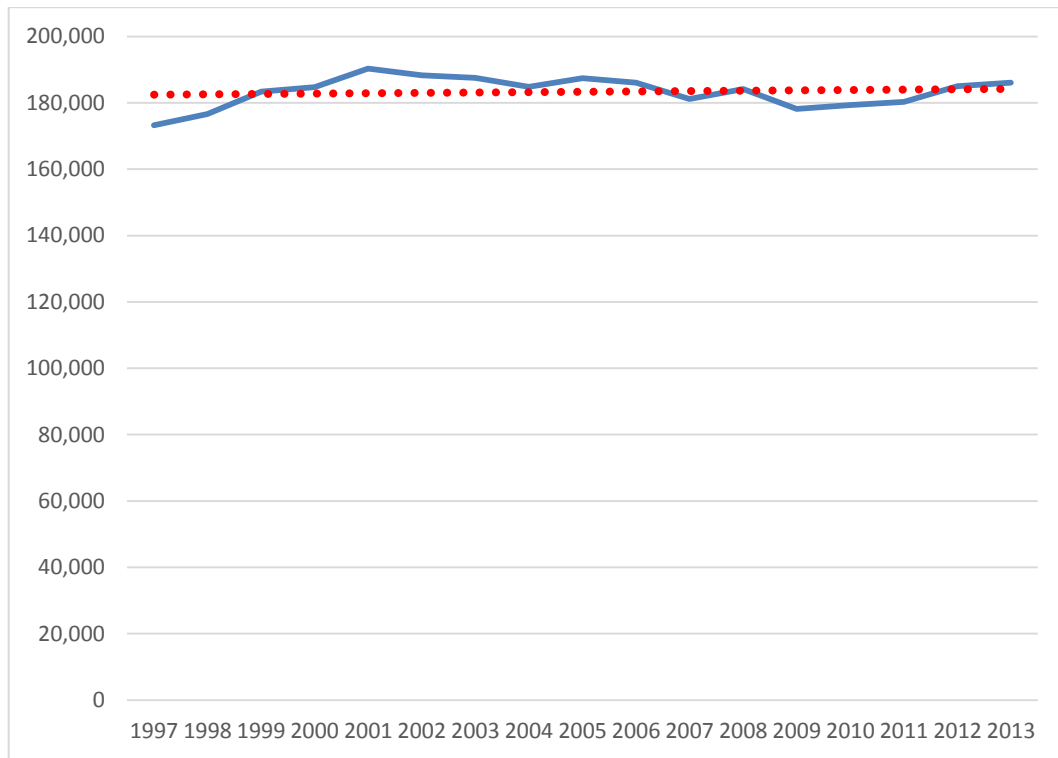
Table D-36 FEMA B use class land need (hectares) – Scenario 1

Use class	2013	2033	2036	Change 2013-2033	Change 2033-2036
B1a/b	162	188	190	+26	+28
B1c/B2	116	106	106	-10	-10
B8	225	270	273	+45	+48
Total B use class	502	563	569	+61	+67

Source: Experian, Atkins

FEMA Scenario 3 – Trend-based projections

Scenario 3 is a trend-based scenario based on the FEMA's historical employment growth levels between 1997 and 2013. As Figure D-6 illustrates, employment numbers have fluctuated over that period, starting from 173,200 FTE jobs in 1997, rising to 190,300 in 2001 and reaching a low of 178,200 in 2009. The average number of FTE jobs over the period 1997-2013 was approximately 183,300.

Figure D-6 FEMA FTE employment 1997-2013 (Scenario 3)⁵

Source: Experian

The analysis of employment change by sector (Table D-37) shows that B1 sectors such as Professional Services recorded high levels of employment growth between 1997 and 2013, but B2 and B8 sectors, such as manufacturing, experienced significant levels of employment decline.

Table D-37 FEMA FTE employment 1997-2013 –sectors with significant numerical change in employment

Sector	Change 1997-2013	% change 1997-2013
Professional Services	+12,900	+7%
Health	+5,100	+37%
Residential Care & Social Work	+3,900	+53%
Computing & Information Services	+3,500	+61%
Education	+2,600	+46%
Real Estate	+2,400	+19%
Computer & Electronic Products (manufacture of)	-1,500	-32%
Metal Products (manufacture of)	-1,500	-47%
Printing and Recorded Media (manufacture of)	-1,500	-71%
Wholesale	-1,800	-8%
Machinery & Equipment (manufacture of)	-2,700	-82%

⁵ The red dotted line shows the linear trend for FTE employment and the blue line shows the historic trend for FTE employment over the period 1997 to 2013.

Sector	Change 1997-2013	% change 1997-2013
of)		
Other Manufacturing	-3,900	-66%
All sectors	+12,900	+7%

Source: Experian

The projection of these historical trends to 2036 suggests growth in B1a/b employment but decline across B1c/B2 and B8 jobs (Table D-38). In total, B use class employment is projected to experience modest growth of 1,680 FTE jobs.

Table D-38 FEMA trend-based employment projections (FTEs) – B use class sectors

Use class	2013	2033	2036	Change 2013-2033	Change 2033-2036
B1a/b	67,410	78,910	80,628	+11,500	+1,700
B1c/B2	11,570	5,470	5,700	-6,100	+230
B8	16,040	12,700	12,435	-3,340	-270
Total B use class	95,020	97,080	98,763	+2,060	+1,680

Source: Experian, Atkins

The above employment projections translate into an additional requirement for some 159,000 square metres of B1a/b floorspace by 2036, and a theoretical surplus of almost 500,000 square metres of industrial and warehousing floorspace (Table D-39).

Table D-39 FEMA B use class floorspace need (square metres) – Scenario 3

Use class	2013	2033	2036	Change 2013-2033	Change 2033-2036
B1a/b	809,000	947,000	968,000	+138,000	+21,000
B1c/B2	463,000	219,000	228,000	-244,000	+9,000
B8	1,123,000	889,000	870,000	-234,000	-19,000
Total B use class	2,395,000	2,055,000	2,066,000	-340,000	+11,000

Source: Experian, Atkins

According to the projections of Scenario 3, the FEMA would have a significant surplus of B use class land by 2036, as the additional requirements for 32 hectares of B1a/b land would be offset by significant decline in demand for B1c/B2 and B8 land (Table D-40). As previously discussed, however, the projections of the trend-based scenario should be treated with caution as such a significant decline in B use class requirements is likely to be unrealistic.

Table D-40 FEMA B use class land need (hectares) – Scenario 3

Use class	2013	2033	2036	Change 2013-2033	Change 2033-2036
B1a/b	162	189	194	+28	+4

B1c/B2	116	55	57	-61	+2
B8	225	178	174	-47	-4
Total B use class	502	422	425	-80	+3

Source: Experian, Atkins

Appendix E:

Proportion of employment in each sector requiring B use class floorspace

Experian analysis

Sector	B1a/b	B1c/B2	B8	NON-B
Accommodation & Food Services				100%
Administrative & Supportive Services	100%			
Agriculture, Forestry & Fishing				100%
Air & Water Transport	25%		50%	25%
Chemicals (manufacture of)		100%		
Civil Engineering	100%			
Computer & Electronic Products (manufacture of)	10%	80%	10%	
Computing & Information Services	100%			
Construction of Buildings	10%	10%	20%	60%
Education	10%			90%
Extraction & Mining				100%
Finance	100%			
Food, Drink & Tobacco (manufacture of)		70%	30%	
Fuel Refining		100%		
Health	10%			90%
Insurance & Pensions	100%			
Land Transport, Storage & Post	30%		50%	20%
Machinery & Equipment (manufacture of)		70%	30%	
Media Activities	50%	30%		20%
Metal Products (manufacture of)		80%	20%	
Non-Metallic Products (manufacture of)		80%	20%	
Other Manufacturing		100%		
Other Private Services	50%			50%

Sector	B1a/b	B1c/B2	B8	NON-B
Pharmaceuticals (manufacture of)		100%		
Printing and Recorded Media (manufacture of)	10%	60%	30%	
Professional Services	100%			
Public Administration & Defence	70%			30%
Real Estate	100%			
Recreation				100%
Residential Care & Social Work	10%			90%
Retail				100%
Specialised Construction Activities				100%
Telecoms	40%	20%		40%
Textiles & Clothing (manufacture of)	10%	60%	30%	
Transport Equipment (manufacture of)		70%	30%	
Utilities	20%	20%		60%
Wholesale			50%	50%
Wood & Paper (manufacture of)		60%	40%	

Oxford Economics Analysis

Oxford Economics sector	B1a/b	B1c/B2	B8	NON-B
Agriculture, forestry and fishing				100%
Mining and quarrying				100%
Manufacturing	10%	80%	10%	
Electricity, gas, steam and air conditioning supply	20%	20%		60%
Water supply; sewerage, waste management and remediation activities	10%	20%	20%	50%
Construction	10%	10%	20%	60%
Wholesale and retail trade; repair of motor vehicles and motorcycles			40%	60%
Transportation and storage	10%		70%	20%
Accommodation and food service activities				100%
Information and communication	70%			30%
Financial and insurance activities	100%			
Real estate activities	100%			
Professional, scientific and technical activities	100%			
Administrative and support service activities	100%			
Public administration and defence; compulsory social security	70%			30%
Education	10%			90%
Human health and social work activities	10%			90%
Arts, entertainment and recreation	20%			80%
Other service activities	50%			50%

Appendix F:

Sites with 1,000 sq. m or more of Net gain or loss of B-class Employment Floorspace

Table F-A Sites with 1,000 sq. m or more of Net B-class Employment Floorspace

	Ref No	Location	Office (B1a)	R & D (B1b)	Light Industry (B1c)	General Industry (B2)	Storage & Distribution (B8)	Mixed B-class (B1/B2/B8)	Total
Aylesbury Vale	app/2103/12	Plots C Bell Business Park, Brunel Road,	1,620	-	-	-	-	-	1,620
	aop/2923/07	land north of Aston Clinton Road MDA - B	27,622	-	-	-	-	-	27,622
	app/1274/06	land at Southern Road,	-	-	-	-	-	2,550	2,550
	app/3478/07	land between Gatehouse Road & Bicester Road,	6,065	-	-	-	-	-	6,065
	app/0713/11	Dayla Soft Drinks, Dayla House, 80 - 100 High Street,	-464	-	-	-	-1,094	-	-1,558
	aop/2388/10	land off Gatehouse Way, Gatehouse Road,	4,944	4,944	-4,352	-	-	-	5,536
	couor/3587/14	Heron House, 49 Buckingham Street,	-2,100	-	-	-	-	-	-2,100
	app/0831/13	Sainsburys, 13 - 19 Buckingham Street and land to rear	-3,938	-	-	-	-	-	-3,938
	app/0824/14	Buckinghamshire County Council, Old County Offices, Walton Street,	-	- 5,413	-	-	-	-	-5,413
	couor/1831/14	Kingfisher House, 61 Walton Street,	-2,150	-	-	-	-	-	-2,150
	app/2855/14	19 Broadfields Retail Estate, Broadfields, Bicester Road,	75	-	-	-	3,045	-	3,120
couor/3237/14	Kings Court, George Street,	-1,290	-	-	-	-	-	-1,290	

Ref No	Location	Office (B1a)	R & D (B1b)	Light Industry (B1c)	General Industry (B2)	Storage & Distribution (B8)	Mixed B-class (B1/B2/B8)	Total
app/3124/14	20 Friars Square,	-1,893	-	-	-	-	-	-1,893
app/0246/14	Ringwood House, Walton Street,	-1,650	-	-	-	-	-	-1,650
adp/2513/14	Tingewick Road Industrial Estate, Tingewick Road,	1,555	-	491	-	-12,395	-	-10,349
aop/1035/09	Land off London Road,	2,880	2,860	2,860	-	-	-	8,600
aop/3041/13	Buckingham University (former Inov8 Site), Tingewick Road,	-3,060	-	-	-11,000	-	-	-14,060
app/3392/13	Buckingham University (former Inov8 Site), Tingewick Road,	-3,006	-	-	-11,000	-	-	-14,006
aop/1144/12	Phase 2, Halton Brook Business Park, Weston Road,	1,536	-	-	-	793	-	2,329
aop/1144/12	Phase 3, Halton Brook Business Park, Weston Road,	-	-	-	-	-	2,302	2,302
aop/0963/11	North Land To East College Road North,	-	-	-	-	23,226	-	23,226
aop/0965/11	North-West land to East College Road North,	-	-	-	20,903	20,903	-	41,806
aop/0964/11	South land to east College Road North,	-	-	6,689	7,804	7,804	-	22,297
adp/2484/07	Haddenham Business Park, Thame Road,	-	-	-	-	-	16,165	16,165
adp/2640/07	Plot A Haddenham Business Park, Thame Road,	-	-	-	-	-	10,657	10,657
aop/1785/11	Silverstone Motor Racing Circuit, Silverstone Road,	-	-	-	-	-	124,200	124,200
app/3745/14	Drakes Drive, Long Crendon Industrial Estate, Thame Road,	-	-	-	-	-	1,141	1,141
aop/2675/08	land adj railway line, Brill Road,	-	-	-	-	1,760	-	1,760
app/0026/09	Plot C Westfield Road, Pitstone Green Business Park,	1,680	32,754	-	-	-	-	34,434
adp/1642	Former PAF Ltd, Mill Lane,	-	-	186	-2,500	-	-	-2,314

	Ref No	Location	Office (B1a)	R & D (B1b)	Light Industry (B1c)	General Industry (B2)	Storage & Distribution (B8)	Mixed B-class (B1/B2/B8)	Total
	/14								
	app/0143 /13	Sugarich (Brackley Dryers), Biddlesden Road,	-	-	-	-	1,000	-	1,000
	app/0869 /14	Westcott Venture Park, Bicester Road,	-	-	4,180	-	-	-	4,180
	app/3346 /14	Land at Westcott Venture Park, Bicester Road,	460	-	950	-	950	-	2,360
	aop/2088 /11	Mount Pleasant, Tamarisk Way,	-2,240	-	-	-	-	-	-2,240
	adp/3552 /13	former MAFF Buildings, Hampden Hall, Wendover Road,	-984	-	-	- 444	-	-	-1,428
	aop/2112 /13	land at Buckingham Road / Furze Lane	-	-	-	-	-	13,500	13,500
	awd/2000 0/11	Calvert Landfill Site, Brackley Lane,	1,634	-	-	1,024	-	-	2,658
	Aylesbury Vale Sub Total		27,296	35,145	11,004	4,787	45,992	170,515	294,739
Chiltern	CH/2005/1685/FA	Chess Business Park Moor Road Chesham (Phase 3)	771	-	771	-	1,574	-	3,116
	CH/2014/0961/FA	Tims Dairy Mopes Farm Denham Lane Chalfont St Peter	-	-	1,419	-	-	-	1,419
	Chiltern Sub Total		771	-	2,190	-	1,574	-	4,535
Wycombe	09/05145 /OUT	De La Rue Coates Lane High Wycombe Buckinghamshire HP13 5EZ	-	-	-	-	-	2,399	2,399
	10/06865 /OUT	Wycombe Marsh Southern Land London Road (Genoa Way) High Wycombe Buckinghamshire	-	-	-	-	-	2,800	2,800
	11/07814 /R4OUT	Former Compair Autopower Bellfield Road High Wycombe Buckinghamshire HP13 5HP	-	-	-	-	-	3,226	3,226
	12/07554 /FUL	Stockwells Yard Ibstone Road Stokenchurch Buckinghamshire HP14 3TW	-	-	-	-	-	5,263	5,263
	12/06259	Land Between Railway And Ercol Furniture Summerleys Road Princes	30	-	-	-	7,400	-	7,430

	Ref No	Location	Office (B1a)	R & D (B1b)	Light Industry (B1c)	General Industry (B2)	Storage & Distribution (B8)	Mixed B-class (B1/B2/B8)	Total
	/FUL	Risborough Buckinghamshire							
	13/05799 /FULEA	RAF Daws Hill Daws Hill Lane High Wycombe Buckinghamshire HP11 1PZ	-	-	1,317	-	1,317	-	2,634
	Wycombe Sub Total		30	-	1,317	-	8,717	13,688	23,752
FEMA	Total		28,097	35,145	14,511	4,787	56,283	184,203	323,026

Appendix G:

Consultation Responses

Summary of Responses received to Consultation Drafts of the “Central Buckinghamshire HEDNA” and “Buckinghamshire HEDNA” with associated replies

Housing Market Area

Background context:

The issue of the HMAs across Buckinghamshire was not considered in the HEDNA. Instead they were addressed by ORS and Atkins in a separate report that was published in March 2015 entitled; *“Housing Market Areas and Functional Economic Market Areas in Buckinghamshire and the surrounding areas”*. This identified a “best fit” for the Central Buckinghamshire HMA based on Aylesbury Vale, Chiltern and Wycombe districts; which provided the basis for the Central Buckinghamshire HEDNA on which Aylesbury Vale and Wycombe consulted in Autumn 2015. Based on this original study, South Bucks district was not included as part of Central Buckinghamshire HMA, but instead formed part of the “best fit” to the Reading & Slough HMA.

The “best fit” conclusions were revisited in January 2016 in a note prepared by ORS entitled; *“HMAs and FEMAs in Buckinghamshire: The Impact of a Joint Plan for Chiltern and South Bucks”*. Having considered the detailed feedback received from stakeholders, that report concluded that a “best fit” housing market geography should be based on Local Plan areas; and the most pragmatically appropriate “best fit” for Chiltern and South Bucks as a single, combined area is as part of the Central Buckinghamshire housing market area: an area that comprises the local authorities of Aylesbury Vale, Chiltern, South Bucks and Wycombe. This subsequently provided the basis for the Buckinghamshire HEDNA on which Chiltern and South Bucks consulted in Spring 2016.

Summary of responses received:

Response from	To	Comment	Reply
Bell Cornwell (for	CDC/SBDC	"The needs assessment must ensure that specific local needs for each District are identified so that they	The OAN identifies Chiltern's needs. These do not

Response from	To	Comment	Reply
Careys New Homes)		can be provided for within the Local Plan." Agree that Chiltern fits in the Central Buckinghamshire HMA "in terms of high levels assessments", but note; cannot assume that "development in the adjacent areas outside the Chiltern boundaries would necessarily meet identified need for Chiltern"; if housing for Chiltern's need is developed outside of Chiltern then future needs assessments "will identify that the current local need still exists and, indeed, has been exacerbated by ongoing lack of delivery within the District"; Chiltern should look at the potential for housing pressure from households migrating in from places such as Wycombe and London.	necessarily have to be met in Chiltern District
Bidwells - Davidsons Developments (06577 b)	AVDC	Fig 5 of HEDNA shows AV boundary crosses Oxfordshire HMA, Milton Keynes HMA and South West Hertfordshire HMA. Buckingham strongest links are with MK. And "there is no agreed approach to identifying Objectively Assessed Need for Housing with Milton Keynes and other surrounding authorities in the sub-region to clarify how the balance of potential unmet need will be dealt with". This fails DtC and is not legally compliant.	The OAN is calculated at the local authority boundary and the same applies with the neighbouring HMAs. This is accepted practice across the country
Carter Jonas and Januarys (06941b)	AVDC	Para 37: The ORS HMA "excludes the northern part of Aylesbury Vale {which} has a functional relationship with the Milton Keynes HMA. Further work will be required to confirm the correct HMA and how the northern part of Aylesbury Vale should be treated".	A very high degree of work has been undertaken on the HMA. The OAN is calculated to local authority boundary best fit within the HMA.
Crest Nicholson - Shenley Park (06929b)	AVDC	Para 3: AV is not only related to Wycombe and Chiltern. The migration and commuting show a north-south split with the north related to MK, Central Beds and Luton and in functional terms to MK. It is not clear how this is addressed in deriving the OAN. Para 4: the Examination Inspector's letter Jan 2014 suggests AV is in a wider HMA with MK, Central Beds, Bedford and Luton and the need for AV to meet unmet needs of "the HMA partners"; there are also concerns from other authorities to the south and east - AV should meet some of their unmet needs. Para 6: Question whether MK should be in the HMA. Para 8: Suggests that it is wrong to exclude MK from the 'best fit' HMA based on 2/3 of AV population in South Bucks HMA and 1/3 in MK HMA. Para 14: Points to CURDS then "testing this using 2011 Census data and ONS internal migration data" suggests AV has significant links to Wycombe, MK, Dacorum, Central Beds, Chiltern, South Oxfordshire, Cherwell and South Northamptonshire. Para 16: CB HEDNA shows FHMA's with Aylesbury linked to Wycombe and Chiltern, Buckingham and Winslow to MK, the rural west of AV to Oxford, and the HEDNA concludes AV HMA is "southern facing" while "CURDS comes to a different conclusion" and refers to CURDS map of "Gold Standard HMA".	The OAN is calculated to local authority boundary best fit within the HMA. ORS do not agree with the findings of the Inspector's letter from 2014 in that we consider that new evidence has developed on the HMA. These findings have been confirmed at the Central Bedfordshire EIP and public inquiries in Bedford and Central Bedfordshire. Issues around the needs of others are a duty to cooperate point.
David Lock Associates - Hallam Land Management (06327c)	AVDC	The HMA should be larger and take account of MK and London. It; "has not produced an outcome which is at all useful for the strategic planning of the wider area, as it appears to isolate the most important centre of economic growth and appears not to reflect the level of influence that Milton Keynes exerts." (para 3.6). They quote: NHPAU (para 3.11; Census migration to MK and London (para 3.16); commuting to MK & London (para 3.25); inspector's criticism of GL Hearn 2013 (para.3.29) {and see para 3.32 - little weight can be given to that study}; Inspector's letter to C Beds Core Strategy - they concur with inspector that the important thing is to identify unmet need and to not make different assumptions across boundaries (para 3.37); MK SHMA review 2013/14 - 24% of AV population in MK HMA; SEMLEC (para 3.45); MK Economic	ORS do not agree with the findings of the Inspector's letter from 2014 in that we consider that new evidence has developed on the HMA. These findings have been confirmed at the Central Bedfordshire EIP and public inquiries in Bedford and Central Bedfordshire. Issues around the needs of others are a duty to cooperate point.

Response from	To	Comment	Reply
		Growth Study 2015 (para 3.46); Bucks HMA/FEMA;	
DLP Planning - McCann Homes (07057b)	AVDC	Summary: small areas are less effective for long term strategic planning; it seriously underplays the economic influences of major employment centres; gives insufficient weight to travel to work patterns; allows diverse assumptions to be adopted which when considered at the higher HMA level result in serious under provision against the national DCLG projections.	ORS consider that the HMA is appropriate and based on the best evidence available.
DLP Planning - McCann Homes (07057b)	AVDC	<p>Paras 3.2-3.6: the HMA omits commuting/migration/need with MK and London leaving them with unmet need. // Refers to NHPAU and notes: "the report states that this upper tier is the most suitable for delivering a strategic planning framework" (para 3.10). Notes that AV falls in the Luton & MK upper tier (with all Beds LAs) (para 3.11). // Migration data 2011 shows "strong flows" from AV to MK and Central Beds (para 3.11). Commuting data 2011 shows "strong flows" from AV to MK and London, and "notable flows" to Central Beds, also flows from MK and Central Beds into AV (para 3.25). // GLH concluded Luton & MK to be the relevant HMA for AV "in accordance with paragraphs 47 and 159 of the Framework" (para 3.27). Following Inspector's criticism "little weight can now be placed upon this previous assessment of housing need in the HMA", but the definition of the HMA is "relevant" (para 3.34). // Central Beds</p> <p>Inspector's view on their HMA discussed in paras 3.35-3.37 and note Inspector's view that ORS work in surrounding LAs "is unlikely that any of the HMAs defined will be coincident with the administrative boundaries of any one authority or group of authorities" (para 3.37), also paragraph 75 - translating the OAN for each HMA into a housing requirement for development plans "will be a matter for discussion under the Duty to Cooperate" (para 3.38). Conclusion: "The importance is the proper identification of unmet need which means not making different assumptions across boundaries. This is important when considering the issue of selecting migration rates for the area that are lower than that assumed in the DCLG as this leaves authorities outside of the area not only with unmet needs but more importantly not being adequately informed of these needs." (para 3.39). // MK SHMA review 2013 (paras 3.40-3.46): 24.5% of AV population is in MK HMA; 41% of land area of MK HMA is in AV; 15,500 MK workers live in AV, with 13,100 of those in the defined MK HMA; AV is "one of the top five" sources of in-migration to MK; EEFM leads to higher dwelling figures in MK; "as the EEFM projections are trend based then this level of growth is actually likely to occur and the DtC should be engaged to address this level of projected growth" (para 3.46). Note also para 3.44: AV and Others raised "the assumptions and the potential cross border impact of the work which emphasises the fact that the use of different assumptions across the wider HMA is creating cause for concern amongst the LPA's" // SEMLEP covers Milton Keynes, Bedford, Central Bedfordshire, Luton, South Northamptonshire, Northampton, Daventry, Kettering, Corby, Aylesbury Vale and Cherwell (para 3.47). // Paras 3.48-3.50 MK Development Partnership: MK "has strong commuting relationships with the neighbouring boroughs of Aylesbury Vale, South Northamptonshire, Northampton, Central Bedfordshire, Bedford and also 'Central London' (i.e. the City of London and Westminster)". // Para 3.51 HMA/FHMA in Bucks & Surrounding Areas: 2011 TTW data says "the majority of residents in the Functional Economic Market Area (FEMA) commute to other parts of the South East (76%) and London (15%) for work". Also lists the most popular destinations, concludes: "This would suggest that in real terms</p>	ORS do not agree with the findings of the Inspector's letter from 2014 in that we consider that new evidence has developed on the HMA. These findings have been confirmed at the Central Bedfordshire EIP and public inquiries in Bedford and Central Bedfordshire. Issues around the needs of others are a duty to cooperate point. There is no need to make additional allowance in the OAN for London and Milton Keynes. All other issues covered elsewhere in response to DLP

Response from	To	Comment	Reply
		the selected area is not a very self-contained location for economic planning".	
Gardner Planning - Arnold White Estates (06338d)	AVDC	HMA doesn't include MK - not clear why	Milton Keynes is a separate HMA
Gladman Developments	CDC/SBDC	There are differences between the OAN and AH for South Bucks in the CB HEDNA and Berkshire SHMA: OAN - HEDNA 355 dpa, Berks SHMA 379 dpa; AH - HEDNA 73 dpa, Berks SHMA 167 dpa	Noted. The two assessment use different assumptions.
Gladman Developments - Regeneris report	WDC	As response to AV, except: "the Central Buckinghamshire definition is 'not the only arrangement possible' (HMA and FEMA Report, para. 7.93). Its analysis shows that there are strong grounds to consider part of South Bucks in the HMA, an area with which Wycombe shares a boundary." (para 3.24) // "Whilst it is sensible not to treat the area as part of an extended London HMA," there are strong connections between Wycombe and London and need to take account of London's housing needs for Wycombe and the wider HMA.	Any request to meet London's need would have to be part of the formal duty to cooperate process
Gladman Developments (07075a) - Regeneris report	AVDC	HMA is reasonable. DtC with MK, but this is distinct from the OAN. Need to take account of in-migration from London and the London economy. // Para 3.18: "Whilst the Central Buckinghamshire HMA probably represents the most practical definition for determining Aylesbury Vale's OAN, it is clear the Central Buckinghamshire HMA contains only part Aylesbury Vale's population." // Para 3.20: AV could work with MK and possible elsewhere on housing requirements "However, this is distinct from determining the district's OAN in the context of a specific housing market area". // Para 3.22: "there should be some recognition that continuing population and economic growth in London will place additional pressure for housing growth" in LAs such as AV. FALP inspector noted concluded engagement with LAs outside London would be one way to deal with London shortfall.	Any request to meet London's need would have to be part of the formal duty to cooperate process
Home Builders Federation	AVDC	Why omit MK? AV and others should work with MK on plans	Milton Keynes is a separate HMA
Pegasus - Lightwood Strategic (06824)	AVDC	Para 2.2 supports 'best fit' HMA; para 2.3 - need to work with adjoining LAs, especially MK; para 2.4 - "some concern" over HEDNA Great London analysis (different from GLA forward plan) - the council should discuss DtC with GLA	Noted and agreed
Pegasus - Lightwood Strategic (06824)	AVDC	Notes the close relationship with London, MK, Oxfordshire and the need for AV to accommodate some unmet need; para 4.5: "imperative that the 'best fit' HMAs relationship with Greater London is considered within the HEDNA, and the associated assessment of housing need"	Noted
RB Windsor & Maidenhead	CDC/SBDC	SBDC has "a stronger functional relationship with east Berkshire than the other Buckinghamshire authorities. There is no guidance in the NPPF, PPG or advice from PAS which supports the use of best fit geography to a local plan area. Research undertaken by the Berkshire authorities, which considers more recent data than that used by the Buckinghamshire authorities, defined: two HMAs (Eastern Berkshire and South Bucks: Slough, South Bucks and RBWM local authorities. Western Berkshire: Reading, Bracknell,	South Bucks is part of a joint plan with Chiltern and therefore need consistency

Response from	To	Comment	Reply
		Wokingham and West Berkshire LAs) and three FEMAs (Eastern Berkshire FEMA: Slough, South Bucks and RBWM LAs. Central Berkshire FEMA: Reading, Wokingham, Bracknell and RBWMLAs. Western Berkshire FEMA: West Berkshire Council." The studies are on the RBWM website.	
Rectory Homes (06798)	AVDC	Question why MK missing from HMA as: connection recognised in previous Regional Plan; levels of commuting AV to MK; MK expanding to south west and a number of planning applications for urban expansion into AV	Milton Keynes is a separate HMA
Slough	CDC/SBDC	Para 1.7: The approach to defining the HMA "ignores the evidence that there is a strong functional relationship between South Bucks and Slough which cannot be ignored because a pragmatic "best fit" approach has been adopted for defining HMAs. The ORS report also concluded, "we would emphasise again that this "best fit" grouping does not change the actual geography of the functional housing market areas that have been identified." Para 1.1 & 1.2: Buckinghamshire HMA and FEMAs report (March 2015) "recommended that South Bucks should be included in a HMA with Berkshire". Para 1.3: GLH "concluded that South Bucks is part of a Housing Market Area with Slough and Windsor & Maidenhead".	South Bucks is part of a joint plan with Chiltern and therefore need consistency
Wokingham BC and Reading BC	CDC/SBDC	Definition of the HMA is not robust: "there is not a comprehensive analysis at the local plan geographical scale of house prices and rates of change in house prices, household migration and search patterns and contextual data (for example, travel to work area boundaries)...no mention of commuting or migration self-containment rates within the October 2015 report {Central Buckinghamshire HMA}... There is also no guidance within the National Planning Policy Framework, the National Planning Practice Guidance or within the Planning Advisory Service Objectively Assessed Need note which supports the approach of assessing the HMA at the geographical scale that a proposed local plan would cover."	The HMAs were defined in a separate detailed study.
DLP Planning - McCann Homes (07057b)	AVDC	Conclusions: (1) 2011 Census results confirm the strong relationship identified in NHPAU - cross boundary relationships between AV and other LAs in , Luton & MK HMA; (2) "While the data can be filtered by excluding moves of over 20 miles, commuting to London and the use of finer grain data the resultant HMA's are simply not fit for purpose."; (3) Sub-division of the top tier NHPAU HMA hampers DtC; (4) "the selected HMA area of Aylesbury Vale, Chiltern and Wycombe is not fit for the purposes of strategic planning as it excludes both Milton Keynes and Mid Bedfordshire both of which have strong relationships with the northern part of this area within Aylesbury Vale"	Noted

Demographic Projections

General context:

This chapter considered the official population and household projections for the Buckinghamshire authorities. In particular, it concentrated on concerns about the 2001 Census, the likely cause and impacts of Unattributable Population Change, the choice between different migration assumptions, the possibility of suppressed household formation in the 2012 based CLG headship rates and a consideration of the role of vacant and second homes.

The HEDNA identified the most appropriate demographic basis for Buckinghamshire to be one which utilised 10-year migration data from 2004-14, corrected to take account of problems with the 2001 Census and estimates of migration within the MYE, together with the 2012 based CLG household projection headship rates.

These assumptions will all be reviewed as part of the forthcoming update.

Summary of responses received:

Response from	To	Comment	Reply
The starting point for Objectively Assessed Need			
Barton Willmore (for Scott Properties)	CDC/SBDC	Adjustment required to take account of the "suppression outlined in the 2012-based CLG household projections for the 25-34 and 35-44 age group". // "The starting point estimate of OAN (the 2012-based CLG household projection) is underpinned by very low assumptions of net international migration to the UK." An adjustment for low net international migration and suppressed household formation would "significantly increase demographic-led OAN for Chiltern and South Bucks".	CLG household projections are based on 40 years worth of trends. Any need to uplift household numbers is considered in the market signals rather than in arbitrary changes to headship rates. Net international migration in the past 2 years has been exceptionally high, but in the period 2011-2014 it averaged around 200,000 per annum which is close to the 184,000 used in SNPP and is also consistent with ORS' modelling framework.
Barton Wilmore (for Copas Farms)	CDC/SBDC	Allowance should be made for suppressed household formation inherent in 2012 CLG projections for 25-34 and 35-44 age groups.	CLG household projections are based on 40 years worth of trends. Any need to uplift household numbers is considered in the market signals rather than in arbitrary changes to headship rates.
Barton Wilmore (for Copas Farms)	CDC/SBDC	The starting point is "underpinned by very low assumptions of net international migration to the UK".	Net international migration in the past 2 years has been exceptionally high, but in the period 2011-2014 it averaged around 200,000 per annum which is close to the 184,000 used in SNPP and is also consistent with ORS' modelling framework.
DLP Planning (07055 b)	AVDC	The starting point should use SNPP. SPRU use that plus increased in migration from London and MK due to growth to conclude a need of at least 23,242 in AV. // The addition for unmet need is accepted, but doesn't start from a high enough base.	London and Milton Keynes migration is already built in to the trend migration. No further uplift is required.
Nexus Planning - Inland Homes	AVDC	Insinuates that lowering CLG starting point contradicts NPPG: Para 3.5: CLG starting point lowered 18,404 – 260 = 18,144 "due to errors in the local population trend data"; para 3.6: "NPPG clarifies that household	There is nothing in PPG which prevents a correction to data errors reducing the starting point. ORS successfully argued

Response from	To	Comment	Reply
(06485 a)		projections produced by the CLG are statistically robust...any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence"	this point at a number of planning inquiries and it has been accepted by some in the development industry.
Official Household Projections			
Gleeson (by Vail Williams for Gleeson & Linden Homes)	AVDC	Household projections: points to language in the HEDNA such as doubt about the reliability of 2001 Census and concludes there is 'ambiguity around housing numbers' and the LA 'needs to have flexibility built into their plan'.	Noted
Population Trends			
Barton Willmore (for Gallagher 06133b)	AVDC	UPC: BW disagree with ORS assumption that "(UPC) is directly associated with migration", but conclude overall, "UPC appears to have little bearing on the net migration trends of the housing market area".	Noted
Barton Wilmore (for Copas Farms)	CDC/SBDC	UPC should not be included in net migration trends "as established in several Local Plan examinations (most recently Arun)"	Local Plans such as Cornwall, Bath and North East Somerset and Cheshire East have agreed to the correction for UPC. The key issue is evidencing the source of the UPC rather than undertaking arbitrary adjustments as was the case in the examples quoted.
DLP Planning - McCann Homes (07057b)	AVDC	Argues UPC should not be adjusted. Quotes from ONS website saying there is insufficient evidence to adjust UPC "This is because we do not have sufficient evidence that the UPC measures a bias in the trend data that will continue in the future" (para 8.29). Quotes from Eastleigh and Amber Valley inspectors saying PC should not be adjusted. Also the AV Plan Inspector; "whilst an over estimation of migration may play a significant part in the other (unattributable) component of change in the mid-year estimates, there is insufficient basis to conclude that it accounts for 100% of this figure" (para 8.32). Concludes: "Substantial reduction in migration rates will have implications for other authorities if the same upwards adjustments are not made" and the decision on UPC should be agreed with other LAs under DtC (para 8.33).	The key issue is evidencing the source of the UPC rather than undertaking arbitrary adjustments as was the case in the examples quoted. While this cannot be done consistently by the ONS it is possible to do this for any single local authority or HMA.
Member of Public (Robert Gill)	CDC/SBDC	"Chiltern District has had an uplift of 752 households applied (16.5%) based on a 10-year migration trend". This compares with figures from Bucks CC research team that: "The last 5 years have seen Buckinghamshire gain on average 1,700 persons per year as more people are moving into the county than are leaving" BCC research predict migration will "increase from 2013/14 until 2016/17 to almost 3,700" then fall again to 1,700 by 2018/19. "From 1991 to 2011 there was no net change in Chiltern due to migration" due to a loss of 190pa 1991-01 and a gain of 190pa 2001-11. "Apart from a higher migration rate in the four years from 2013/2014 to 2016/ 2017, three of which are already included in the base projections, the future rate of net migration is forecast to remain at historic levels." The BCC report "states that Chiltern and South Bucks are projected to have more people leaving to go overseas than coming into	A key issue for many HEDNAs and similar studies is the ageing population. While population growth is not forecast to be very high this still translates in to a higher need for housing due to more single older person households. Across most of England population growth is forecast to be lower than household growth

Response from	To	Comment	Reply
		these districts and that their projected net differences between births and deaths are similar and will contribute only a small increase of 100 over the Plan period".	
Member of Public (Robert Gill)	CDC/SBDC	The BCC report states that "the increase in migration in the last three years is due to the availability of new housing", so people are moving in "simply because new housing is available and not to meet any local need".	Migration and housing build can be linked with major new developments seeing a rise in migrant numbers. However if an area has seen low development and low migration in the recent past then this must be considered as part of the market signals.
Gladman Developments (07075a) - Regeneris report	AVDC	Concludes ORS projections is only slightly lower than SNPP 2012 and suggests a higher growth rate: "In this regard the preferred demographic scenario does not appear to represent an unreasonable starting point projection" (para 3.36). However - AV needs to consider whether recent MYEs suggest higher rates of growth and the possible increased requirement for housing (para 3.37). // Para 3.33 - Some assumptions questioned: (1) "ORS assumes that the 2001 Census overestimated the district's population, the implication might be that a further adjustment for UPC in the latest mid year estimates is not necessary."; (2) Use of GP registers - around 3,300 higher than MYE in 2011, but similar to MYE in 2014 - this discrepancy not explained; (3) Housing completions of 1,100 2011/12-2013/14 would need a significant uplift "to contribute to the district's population growing at a higher rate than that of previous years".	The overall point on the demographic starting point is noted.
Barton Willmore (for Gallagher 06133b)	AVDC	ONS projections and household formation: CB HEDNAS - household formation rates in 2012 result in 10% fewer households than 2008 (suppressed rates for 25-30 year olds). GL Hearn concede this and adjust Market Signals; BW say this should be a demographic correction (para 3.16); uplift demographic need of 36,853 dwellings by 10% (para 3.18)	CLG have been extremely clear that 2008 based household projections did not reflect the reality of the time and that they have been superseded by 2012 based projections
Considering Migration Assumptions			
Home Builders Federation	AVDC	Do not agree with using historic trends as longer term trends could miss recent evidence, eg higher migration. 2012 ONS should be used, BUT: agree 10-year projection used by ORS is acceptable as final figures are close to ONS 2012.	Noted. Using longer-term trends are consistent with other ORS studies in the wider region and also with the London Plan.
Capita Property and Infrastructure (06934a)	AVDC	The housing requirements from "out-migration from London" should be considered a minimum as affordability in London will increase the migration to Aylesbury. // No details in the HEDNA of the need in the town centre generated by increased commuting.	The migration statistics include trend migration from London. The population projections used for the HEDNA are consistent with those used in the Further Alternations to the London Plan and have been agreed with the GLA.
DLA Barwood Simon Andrews (07053)	AVDC	A 5-year migration trend should have been used: Notes difference between ORS and GLH and attributes it to use of 5-year and 10-year migration trends and references Fig 25 of the CB HEDNA, which: "seem to indicate an increasing trend over the past 7 years". In-migration will continue to grow, including from London and says AV should "err on the high side and should consider the potential implications of a higher housing requirement than that in the Central Bucks HEDNA".	The HEDNA outlines why ORS favour a 10 year trend over a 5 year one. ORS consider 10 year trends to be a much more robust basis for developing policies over a planning horizon
DLP Planning -	AVDC	Considers migration in the NHPAU Luton & MK HMA and individual LAs. 2012 SNPP shows a higher	ORS do not consider the HMA discussion to be relevant

Response from	To	Comment	Reply
McCann Homes (07057b)		population in 2011 and higher migration than earlier figures used in various plans (Para 4.2), therefore past considerations of OAN might be inadequate (para 4.4). A summary of changes to 2031 is shown at Table 8.	because they do not consider that Luton and Milton Keynes are in the same HMA as Aylesbury Vale
DLP Planning (07055 b)	AVDC	2001-2011 is not the right period to use: it does not take into account up to date data and it includes the economic downturn and recession which it would be unsound to carry forward across the whole plan period. // Note that para 2.10 says: "The HEDNA, at Figure 2, makes reference to an adjustment of minus 260 based on 10 year migration trends in AVDC." Net migration from SNPP for 2012-2031 is 1,047 pa. // Unmet need from Luton should also be considered alongside MK (para 2.13)	Milton Keynes and Luton are not in the same HMA as Aylesbury Vale. The time period used includes both a boom and a recession and reflects a robust position on which to base long-term policies
Gladman Developments - Regeneris report	WDC	As response to AV, except: (1) in any revisions to the HEDNA, consider using 2014-based projections and "Some testing of the higher migration variants produced by the ONS might be appropriate in further refinement of the OAN evidence"; (2) "there is a case for specifically testing the implications of an increase in migration from London to Wycombe" (para 3.32)	At the time of writing, 2014 based population projections have been released and 2014 based household projections are scheduled for release on July 12th. The consequences of these are not yet known, but will be reviewed. The migration assumptions used in the HEDNA are consistent with the Further Alternation to the London Plan and have been agreed with the GLA.
Marrons Planning for Ray Construction (06905)	AVDC	Conclusions broadly correct on evidence at the time - 21,000 dwellings, but: need to take account of 2014 based projections, especially growth including in migration "which continues to be persistently under estimated". 2014 give "growth figure of 6.9% between 2014 and 2024 compared to 6.6% in the 2012 based". Also: "the London Plan is based on a net outflow between 2012 – 2037 which is 380,000 higher than that suggested in the 2012 based population" projections" and because of that, figures based on a 10-year migration trend are not "sufficiently robust"	At the time of writing, 2014 based population projections have been released and 2014 based household projections are scheduled for release on July 12th. The consequences of these are not yet known, but will be reviewed. The migration assumptions used in the HEDNA are consistent with the Further Alternation to the London Plan and have been agreed with the GLA.
Pegasus - Edward Ware Homes (06824)	AVDC	Migration: Using 2004-14 migration "results in a scenario dominated by recessionary based trends"; asks for evidence that an uplift shouldn't be applied as migration may return to pre-recession levels	The HEDNA outlines why ORS favour a 10 year trend over a 5 year one. ORS consider 10 year trends to be a much more robust basis for developing policies over a planning horizon. The time period includes both a boom and a recession.
Pegasus - Lightwood Strategic (06824)	AVDC	Migration: 2004-14 migration needs uplifting. GLH take account of recession lowering migration in & out of London (para 4.8) and GLA analysis said alteration from trend-based would be required from 2017. Net in migration reduced by 29% on pre-recession numbers (para 4.9). Same applies to Wycombe and Chiltern from 2017.	The migration statistics include trend migration from London. The population projections used for the HEDNA are consistent with those used in the Further Alternations to the London Plan and have been agreed with the GLA. ORS consider the approach adopted by GL Hearn to be fundamentally flawed.
Persimmon	AVDC	Migration too low: 2012 projections most up to date and suggest AV annual growth = 920 (higher than 907 used) // ONS migration low for last 15 years, 2012 SNPP = net 165,000 is half the total of the latest ONS figures and outflow in London Plan = +380,000 on SNPP.	ORS assumptions are consistent with the GLA Further Alterations to the London Plan. International migration is currently significantly higher than trend. This represents a

Response from	To	Comment	Reply
			very good reason not to use more recent data which does not reflect long--term trend. Clearly Brexit may have a significant impact on international migration.
Household Representative Rates			
DLP Planning - McCann Homes (07057b)	AVDC	2012 household projections HRRs "model forward the negative impact of undersupply and the recession" and should be adjusted (eg for more under 35s forming households in the future). Quotes Ludi Simpson and Neil McDonald and suggests that ORS should have modelled the scenarios presented. Paras 8.36-8.40 are reproduced in 'Ludi Simpson' tab.	CLG household projections are based on 40 years worth of trends, not just the 2000s. Any need to uplift household numbers is considered in the market signals rather than in arbitrary changes to headship rates.
DLP Planning (07055 b)	AVDC	Using 2012 household formation rates is in appropriate; "this would not reflect the planning principles in guidance (Paragraph 17) or the NPPF (Paragraphs 48 and 50)." These should be increased to address affordability and suppressed household formation rates.	CLG household projections are based on 40 years worth of trends, not just the 2000s. Any need to uplift household numbers is considered in the market signals rather than in arbitrary changes to headship rates.
Member of Public (Robert Gill)	CDC/SBDC	"The population of Chiltern is forecast to increase by 8,548 in the period 2011 – 2036, Applying the {CLG} person per household (PPH) figure of 2.35 gives a requirement of 3,637 new homes and not the 4,552 used in the Plan which assumes a person/ household figure of 1.88. Given historic trends it is inconceivable that it will drop that far in 25 years."	The reason for the greater growth in households is an increasing number of single older person households. Due to the ageing population household growth will be higher than population growth
Pegasus - Lightwood Strategic (06824)	AVDC	Representative Rates: "support the use of the 2012 household representative rates, but only on the basis that the necessary adjustments to these occur through the identified market signals uplift; notably, in respect to seeking a return to trend for younger household formation rates."	Noted
Household Projections			
Gladman Developments (07075a) - Regeneris report	AVDC	Household formation was suppressed among younger in the 2000s (Figure 3.1 - CLG 2012-based projections). Rising house prices and high demand are part of the explanation (para 3.45) The HEDNA needs to consider whether an "alternative future trajectory for household formation in younger age groups should be tested in the OAN figures" (para 3.46.	CLG household projections are based on 40 years worth of trends, not just the 2000s. Any need to uplift household numbers is considered in the market signals rather than in arbitrary changes to headship rates.
Buckinghamshire County Council (06926)	AVDC	Recognise that adjustments may be needed with changes to household or population projections. Housing growth needs to take account of economic growth targets "identified through the Bucks Thames Valley Strategic Economic Plan and subsequent reviews of the Strategic Economic Plan"	Noted
Crest Nicholson - Shenley Park (06929b)	AVDC	Paras 24-29: refer to Holmans and McDonald/Williams and concludes difference between 2008 projections and 2011 Census is largely household formation rates; in-migrants exhibiting lower rates, and the recession suppressing household formation (which will gradually reverse). Para 32: The 2012 -based projections fall between Holman's estimate and 2011-based interim projections and "potential further adjustment is needed to the 2012-based projections" to account for the gradual reversal of suppressed household formation rates. Para 34 uses Holman's average household size projections and 2012-based projections to arrive at an average annual increase of 1.04% - 1.12% increase in "housing stock" nationally.	Noted, but CLG have been extremely clear that 2008 based household projections did not reflect the reality of the time and that they have been superseded by 2012 based projections

Response from	To	Comment	Reply
		Para 35 applies these rates to AV and gets 1,100 or 1,180 dpa - higher than the CB HEDNA of 1,050.	
David Lock Associates - Hallam Land Management (06327b)	AVDC	Should be at least 23,242 based on DCLG 2012 including 3.8% vacancy rate and 10% uplift for household representative rates plus 111 dpa for undersupply in London. Should be based on SNPP migration and migration to MK and London plus increasing household formation rates above those in the 2012 DCLG projections. Plus higher employment growth	There is nothing in PPG which prevents a correction to data errors reducing the starting point. ORS successfully argued this point at a number of planning inquiries and it has been accepted by some in the development industry. Headship rates should not be arbitrarily adjusted and are considered at the market signal stage. London and Milton Keynes migration is already built in to the trend migration. No further uplift is required.
David Lock Associates - Hallam Land Management (06327b)	AVDC	In-migration lower than SNPP figures and does not use most recent data of 980 in-migrants a year - contrary to guidance. // 2011-11 not appropriate period "as this time period encapsulated the very conditions that has led to the present housing crises" and replicates the problem. // Economic growth from MK and London is ignored. // Demographic growth from unmet need in London and other areas is ignored. // 2012 household formation rates inappropriate and need to increase to address affordability and suppressed household formation rates	The most recent data must be considered, but not necessarily used. This issue is addressed in the HEDNA. There is nothing in PPG which prevents a correction to data errors reducing the starting point. ORS successfully argued this point at a number of planning inquiries and it has been accepted by some in the development industry. Headship rates should not be arbitrarily adjusted and are considered at the market signal stage. London and Milton Keynes migration is already built in to the trend migration. No further uplift is required.
DLP Planning - McCann Homes (07057b)	AVDC	Implies the CB HEDNA should use the SNPP approach to migration and that discounting by reference to UPC is unreliable. 2001-2011 is a period which ignores recent evidence and included growing affordability problems followed by recession, neither of which should be taken forward in projections. They present a figure for an alternative 10-year period of 2004-2014 which gives a higher population (510,594) (para 8.4). // ORS argue for use of long term trends, but the mid trend migration "excludes the higher levels of migration experienced after 2011" (para 8.13). // Points to the guidance not accepting that DCLG projections are unreliable; "(Paragraph: 017 Reference ID: 2a-017-20140306)" (para 8.14). // Quotes "DCLG Housing Statistical Release (27th February 2015) 2012-based Household Projections: England, 2012-2037 (Appendix 23)" and "ONS Methodology: 2012-based Subnational Population Projections (29 May 2014 - Appendix 24)" to show that SNPP are used by central & local government, NHS etc. (paras 8.15-8.16). // Notes that ORS "did not raise this fundamental issue regarding the unreliability of the 2012 SNPP" in the ONS consultation on the 2012-based SNPP (para 8.17). // Points to ESRC Centre for Population Change "Revised methodology for setting the migration assumptions for the 2012- based national population projections" (para 8.18-8.19). // The choice of 2001-2011 for 10-year net-migration is "choice taken to reduce the level of housing requirement". // Concludes: "using a lower level of migration and making no attempt to secure that this excluded population is accounted for elsewhere means that the needs of this element of the population which amounts to some 2,000 people (50 a year for 20 years) is	There is no requirement to use SNPP and a 10 year migration trend is now the most widely accepted. If the source of UPC can be identified then it should be corrected for. ORS are using CLG headship rates with more robust migration data. Migration assumptions are consistent with other neighbouring areas and the London Plan.

Response from	To	Comment	Reply
		effectively excluded from the plan led system" and this is; "contrary to paragraph 17 of the framework that seeks to meet the nation's housing requirements in full" (paras 8.23-8.24). // The levels of migration decided upon should be discussed with other LAs under DtC (paras 8.25-8.26)	
Member of Public (Robert Gill)	CDC/SBDC	Most adjustment factors are double counting as: "an extrapolated historic trend includes such factors as birth and death rates, migration into the area etc. Further adjustment should only be made in extreme circumstances and as a result of identifiable and quantifiable factors".	The adjustments made seek to move from replicating the performance of the housing market to improving its performance. All the changes are consistent with national guidance.
Nathaniel Lichfield - CEG (06858)	AVDC	Repeats: Economic forecasts (compared to GLH) and AH low. Also: not reasonable to adjust MYE for UPC using an "estimate of UPC which will not be validated until after the 2021 Census"; international in-migration and pop growth has exceeded 2012 SNPP for 2013&14; ONS say UPC should not be carried forward in pop projections eg migration projections have improved and the source of UPC is unknown.	UPC should be corrected when its source can be identified. If it is not correct then migration statistics will be counting the continuation of persons moving to an area who did not move there in the first place.
DLP Planning - McCann Homes (07057b)	AVDC	Conclusions: (1) not justified in using data which is 15 to 5 years old for future migration; not justified to amend "populations and then derive adjusted migration levels from these amended populations"; not justified in rejecting SNPP for being short term trend; (2) inappropriate "to treat the UPC as an adjustment to net migration"; (3) unadjusted 2012 household formation rates not acceptable - "An adjustment should be made in line with the "no worse than 2012" scenario."	All the assumptions are fully justified in the HEDNA and all have been extensively tested at EIP and public inquiries.
Capita Property and Infrastructure (06934a)	AVDC	"The housing requirements set out within the HEDNA are supported, including the adjustments to the Government's projections and adjustments including out-migration from London to Aylesbury."	This is referring to the wrong HEDNA
Pegasus - Lightwood Strategic (06824)	AVDC	States: "HEDNA's analysis of the CLG population projections is supported and the rebasing of the population projections for the three local authorities is not disputed."	Noted

Affordable Housing Need

Background context:

This chapter considered both existing households in need and also the likely needs of future households and then offsets these against the projected supply of affordable dwellings. The chapter carefully considers all potential components of affordable housing need while seeking to ensure that double counting does not occur. The chapter makes allowance for the needs of homeless households and concealed families while also considering the role of the benefit system in meeting housing need.

Summary of responses received:

Response from	To	Comment	Reply
Identifying households who cannot afford market housing			
Barwood Land Ltd - Chilmark Consulting Ltd (06882)	AVDC	Definition of AH need: Para 16: why is the existing number of HB claimants maintained over time?; why is HB used as the definition when Government policy is to reduce HB over time? (lists welfare reforms). //Para 17: what about right to buy and starter homes? // para 19: The is explicit recognition of the limitations of the assessment at HEDNA para 4.72 (a different definition would identify greater need and this is a minimum number).	Government policy is not to reduce HB over time. OBR figures indicate that they are assuming that HB in the private rented sector will rise over time. Government policy is to reduce the unit cost of HB by reducing claims in high value areas. Starter Homes will be addressed in the updated HEDNA and right to buy sales reduce the affordable housing stock on a one for one basis.
CBRE for Biddulph (Buckinghamshire)	CDC/SBDC	"The HEDNA states that a broader assessment of affordability might yield a different and higher figure. This figure will be required in subsequent work on the evidence base to ensure a more complete picture of this aspect of housing need assessment."	Noted, but the HEDNA reflects the reality of recent allocation policies and allows for households who are in receipt of government subsidies to have their needs met.
Gladman Developments	CDC/SBDC	AH is assessed only on those households in acute need and only gives a minimum figure. The definition should be broadened.	Noted, but the HEDNA reflects the reality of recent allocation policies and allows for households who are in receipt of government subsidies to have their needs met.
Kemp and Kemp - Monor Oak Homes (06943a)	AVDC	Paras 2.6-2.8: Questions the affordability cut off of 30%. Points to Oxfordshire SHMA using 35% of income, which was found sound at Cherwell DC examination in Dec 2014. 35% should be used.	This would only impact on the mix of affordable housing, not the total
Nathaniel Lichfield - CEG (06858)	AVDC	The model inputs, assumptions and conclusions are not explained. // It: "includes a number of elements which are contrary to policy, such as assuming the continued role of housing benefit in the Private Rented Sector"; sets households moving out of AH need against the AH need, PPG does not say this, but says that "future need should be counted as newly forming households unable to afford market housing, combined with existing households falling into need". // The model concludes that average AH is 23.9% of overall demographic-led needs; this is low as the HMA includes unaffordable areas. CEG unable to "scrutinise" the calculation as no figures are presented.	The model is fully explained and has been understood by other consultants at other EIPs.
Nathaniel Lichfield - CEG (06858)	AVDC	The AH calculation should consider the income required to afford housing, and the gross number unable to afford. This and backlog to be counted against the supply of housing, including re-lets. {They don't say whether households moving out of AH free up a re-let.}	The ORS affordable housing model has been designed to be consistent with the requirement that affordable housing is part of the OAN. If PPG is not explicit on an issue it is still necessary to fill the gaps in the model. This is consistent with the Kings Lynn v SSCLG judgement from 2015.
Pegasus - Lightwood Strategic (06824)	AVDC	"to base 'need' on existing housing benefit claimants (paragraph 4.40) is neither accurate nor supported by the Framework or PPG" (para 4.15); It should be on affordability. // Para 4.17: incorrect to assume that households in PRS without HB "can afford the housing compared to their disposable income" and PAS guidance 2015 relates affordable need to households' ability to pay (para 4.18). // Para 4.21: Councils should widen opportunities for home ownership - intermediate housing and starter homes (para 4.22)	Need in PPG is defined as households who cannot afford the market. Housing benefit receipt is an indicate that the government believe that the household cannot afford. PAS guidance of affordable housing is deeply flawed and not used. Starter Homes are still not affordable housing at the

Response from	To	Comment	Reply
		should be assessed.	time of writing, but will be included in the updated HEDNA
Current unmet need for affordable housing			
Barton Willmore (for Gallagher 06133b)	AVDC	AH: PRS should not be counted towards AH; increase by 250 to 700 pa	ORS do not count PRS. Housing benefit enables some households to afford PRS and without this financial support they would otherwise need affordable housing. No PRS supply is counted.
Barwood Land Ltd - Chilmark Consulting Ltd (06882)	AVDC	Para 9: No allowance made for existing households in need, contra GLH approach and identifying 5,204 on housing register (1,209 in reasonable preference). // Not clear how the net reduction (of 226 pa) in households needing AH is calculated. // CB HEDNA shows reducing need, while GLH shows increasing need.	The backlog of need is calculated from page 79 onwards
Projected future affordable housing need			
Pegasus - Edward Ware Homes (06824)	AVDC	Councils choose to identify only those in "acute need" - this doesn't follow NPPF/G, which "identify that a household is in affordable housing need if their housing is unsuitable by virtue of being too expensive compared to disposable income." // Also need to assess starter homes.	Need in PPG is defined as households who cannot afford the market. Housing benefit receipt is an indicate that the government believe that the household cannot afford. PAS guidance of affordable housing is deeply flawed and not used. Starter Homes are still not affordable housing at the time of writing. Starter Homes will be included in the forthcoming update
Assessing the overall need for affordable housing			
Gladman Developments - Regeneris report	WDC	As response to AV , except: GLH not mentioned; concludes: "were the area to provide affordable housing at a level that included provision for all households currently in private rented accommodation and in receipt of housing benefit, the figure would be significantly higher at 5,670 (283 per annum)." (para 3.90)	Noted, but ORS do not agree with the underlying assumptions around housing benefit
Gladman Developments - Regeneris report	WDC	The summary of conclusions is at para 3.91, page 19 of the regeneris report	Noted
Carter Jonas and Januarys (06941b)	AVDC	Para 41: HEDNA gives a range of 8,700 - 14,000 AH, then settles on 9,000 (4,381 for AV); "It is not clear why the lower end of the range has been selected and therefore we suggest that the affordable housing requirement needs to be properly justified".	The higher end would require all household in receipt of housing benefit in the private rented sector to move to affordable housing and that is not considered being a realistic assumption.
Chiltern Conservation Board (06970b)	AVDC	The AH calculation is likely to become out of date quickly following the new definition of AH. The HEDNA will need to be reviewed after a short time.	Noted
Gladman	AVDC	It would be "prudent" to use the GLH figure of 412 dpa given the ORS "stringent definition of this need"	The ORS model is fully consistent with PPG, the NPPF and

Response from	To	Comment	Reply
Developments (07075a) - Regeneris report		(para 3.108). Specific points: Lowering overcrowding - appears to be critical of the "implication seems to be that any residents under the age of 21 of the same sex are assumed to be able to share a room" and excluding students (para 3.95); the results of this lowering are not set out, but are significant (para 3.96). // Clarify: "the link between suppressed household formation and the appropriate number of concealed households that should be included in the analysis is not spelled out in the HEDNA" (para 3.99) to demonstrate none are omitted. // On newly arising AH need: the difference is explored between ORS (190 pa) and GLH (789). Three points identified: (1) newly forming households who cannot afford market (ORS 20%-22%; GLH 38%) (para 3.104); (2) households dissolving because of death or moving - the effect of this is "substantial", nearly 1,900 households pa (para 3.105); (3) the assumption that existing households falling into need are more than offset by households becoming able to afford housing (para 3.105).	High Court judgments. The GL Hearn model is different and ORS do not consider it to be robust.
Gladman Developments (07075a) - Regeneris report	AVDC	The summary of conclusions is at para 3.109, page 22 of the regeneris report (page 59 of the Gladman response)	Noted
Marrons Planning for Ray Construction (06905)	AVDC	Need to take account of starter homes	Noted, but they are still not affordable housing at the time of writing. They will be included in an updated HEDNA
Nathaniel Lichfield - CEG (06858)	AVDC	CEG completing a detailed critique of HEDNA, will be with AV "in due course"; HEDNA has a "number of shortcomings", noted are: AH and economic forecasts low (references GLH)	Noted, but difficult to respond at this stage
Capita Property and Infrastructure (06934a)	AVDC	"The HEDNA conclusions on affordable housing are considered to be valid and confirm a continuing and pressing need to provide additional land for both market and affordable housing."	This is referring to the wrong HEDNA

Economic Forecasts

Background context:

The chapter sets out ORS' approach to economic activity rate modelling. This uses lower economic activity rates than the main forecasting houses to project the size of the future workforce. The chapter also sets out Atkins analysis of future jobs growth and compares the trend rates of jobs growth with those forecast by Oxford Economics and Experian. As a balanced judgment it concludes that the Oxford Economic forecast is the most robust.

This conclusion will be tested again in the forthcoming update of the HEDNA and the outcome will be fully justified.

Summary of responses received:

Response from	To	Comment	Reply
Barton Willmore (for Scott Properties)	CDC/SBDC	Using FTE as the measure of job growth: "When compared with 'workforce jobs' the FTE is much lower (in the case of the Experian forecasts), resulting in a much lower economic-led OAN for the joint area". // The OE and Experian forecasts should be triangulated with CE "line with the triangulated method which found favour with the Local Plan Inspector in South Worcestershire".	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.
Buckinghamshire County Council (06926)	AVDC	"conclusions on managing employment growth should also consider infrastructure investment needs, in terms of the road, rail, public transport, energy, broadband, water, minerals and waste infrastructure investment needed to support future employment growth"	Noted
Carter Jonas and Januarys (06941b)	AVDC	MK needs to be taken into account. Para 43: points to Inspector's letter to AV (Jan 2014); "there is a relationship between Aylesbury Vale and the future growth of Milton Keynes beyond its boundaries"; there are "significant issues in terms of accommodating potential unmet needs from other authorities, including Milton Keynes." and joint working is essential; "significantly more housing is required to support job growth".	ORS consider that recent work on HMAs has superseded this issue.
Chiltern Conservation Board (06970b)	AVDC	"It is inconsistent for the economic forecasts to use preferred scenarios based on aspirational forecasts, why not use historic trends like the housing figures? These would be much lower and then not generate the uplift to match housing to jobs."	Past trends are very useful for assessing future jobs growth, but allowance must also be made for factors which will change this scenario. The chapter carefully considers all of the options.
DLP Planning - McCann Homes (07057b)	AVDC	Considers the Luton & MK HMA and individual LAs. Uses EEFM to show a higher jobs figure. Presents EEFM January 2015 run figures to demonstrate accelerating job growth post-recession; "these latest forecast indicate an increase in the level of job creation in Central Bedfordshire and Aylesbury with a reduction in projected growth in Milton Keynes and Luton" then argues that "The volatility of the projections at district level are another reason why reference to the wider HMA is advisable". Some forecasts are lower in 2015 than 2014 - see the table in the 'DLP Table - EEFM 2014 & 2015' tab.	ORS do not agree on the HMA
DLP Planning - McCann Homes (07057b)	AVDC	Criticises ORS/Atkins adjustment of economic activity rates. Presents charts showing small increase in England, slight decrease in East of England over time. Source for charts not given. Concludes rates should be held constant as per Chelmer model.	The OBR rates used by ORS are now the most widely accepted rates at EIP and public inquiries. The rates used by ORS are lower than those used by the forecasting houses, so they are assuming more workers are available to fill jobs.
DLP Planning - McCann Homes (07057b)	AVDC	Reviews local documents. MK Development Partnership Employment Land Review and Economic Growth Study (ELAGS): compares EEFM and Experian forecasts and effects on commuting. Concludes MK SHMA 2014 (ORS) took these implications into consideration, but notes that the EEFM used is 2014. // Central Bucks HEDNA (2015): Lists reasons for use of OE over other models, concludes: "It is not ... sufficient justification. The Framework requires plans to be aspirational and realistic. Selecting the higher of the projections would meet this criteria selecting the "middle" projection does not" (para 5.28). The projected rate from OE is lower than EEFM and all projections in GLH. Also, GLH takes "local economic growth	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.

Response from	To	Comment	Reply
		drivers" and planned investments into account.	
DLP Planning - McCann Homes (07057b)	AVDC	Conclusions: (1) CB HEDNA "has not selected the highest reasonable assumption in terms of future jobs growth for Aylesbury Vale, further more it has not taken into consideration more local assessments of future potential job creation."; (2) it "fails to take into account the needs of Milton Keynes which is likely to require housing to be provided for between 1,221 and 2,433 of its own workers based upon the most recent projections".	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.
DLP Planning (07055 b)	AVDC	SPRU conclude employment growth is too low for AV as it is lower than the EEFM and GLH projections.	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.
DLP Planning (07055 b)	AVDC	"A central reason to the previous Plan being found unsound at Examination was due to the lack of integration of economic and housing strategies. The HEDNA and figures for AVDC must also not be considered in isolation from other work progressing in surrounding districts." Need to work with MK as MK will have unmet need.	Noted
Gladman Developments	CDC/SBDC	Economic growth could be higher than assessed in the HEDNA as: (1) activity rate change assumptions look too optimistic; (2) detailed evidence for how the preferred jobs growth compares with the trend of job creation over 10-20 years; (3) clarity and robust evidence required over the assumption made in changing commuting patterns (refers to PAS guidance about risks of changing commuting assumptions). (para 2.2.15)	ORS economic activity rate model and commuting model has been accepted at the Cheshire East Local Plan and many public inquiries. Further details will be provided in an update report.
Gladman Developments - Regeneris report	WDC	Need to justify using OE over Experian: The OE scenario employment growth "that sits between a scenario in which employment (FTEs) is projected to fall by 3,000 or increase by 13,800 (Experian). This is a very broad range indeed, and is therefore not particularly helpful in coming to a view about whether the preferred jobs growth scenario is one which is robust, reasonable and positive." (para 3.53). If no further justification is given it is; "not unreasonable to assume that employment growth in the district, along with the housing need associated with it, could be somewhat higher than the preferred scenario and recommended OAN for Wycombe currently suggest" (para 3.54)	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.
Barton Willmore (for Gallagher 06133b)	AVDC	CB HEDNA should use the 'committed growth scenario' from GL Hearn, results: increase OAN by 5,366 to take account of "local job growth factors specific to Aylesbury Vale".	The HEDNA has taken a balanced view of jobs growth which is above past trends. Additional information will be provided in the forthcoming update.
Gladman Developments - Regeneris report	WDC	As response to AV Paras 3.63-3.82. Conclusion after following the same process as in the AV report: "the adjustment to the housing need figure would give an additional housing need to economic growth which was a little higher at 1,960 compared with 1,500 in the HEDNA".	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.
Gladman	AVDC	Increase to 1% growth rate. Compares Atkins, GLH and regeneris growth rates and concludes: "A growth	The forthcoming update will include more information on

Response from	To	Comment	Reply
Developments (07075a) - Regeneris report		rate of 0.9% pa in ORS/Atkins compares with around 1.0% per annum in the GL Hearn study. Growth of this order would be consistent or better than growth rates achieved in the past" (para 3.58). But an uplift is required for major investments (as GLH). Concludes that growth rate should be 1% to take account of investments and "It would also represent the positive approach to planning for growth the NPPF requires" (para 3.62)	jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.
Gladman Developments (07075a) - Regeneris report	AVDC	Several points questioned: (1) Economic activity rates are not given in the HEDNA. Economically active population in different age groups is for Central Buckinghamshire only, therefore hard to judge whether this is right for AV (para 3.69); (2) "it is not clear how the economic activity rates for different age groups in 2013 given in Figure 83 have been derived" the rates look very high for some groups (para 3.70); (3) "substantial increases in economic activity rates for the over 65s" are higher than those of the OBR (para 3.71); (4) the commuting ratio (calculated by regeneris from the HEDNA) is 1.43, but the 2011 Census commuting ratio is 1.20 - what justification for this? (paras 3.74 & 3.76); (5) a projected decrease in unemployed is shown as an increase in economically active, which implies either a misunderstanding (as unemployed are economically active) or double counting (para 3.80).	ORS economic activity rate model and commuting model has been accepted at the Cheshire East Local Plan and many public inquiries. The rates used by ORS are lower than those used by the forecasting houses, so they are assuming more workers are available to fill jobs. Further details will be provided in an update report.
Kemp and Kemp - Monor Oak Homes (06943a)	AVDC	Paras 2.3-2.5: Housing need is solely on job growth, not including strategic economic growth. It is not clear how Oxford Economics have accounted for the Growth Deal with Bucks Thames Valley LEP in its economic projections. It has not been fully recognised and an uplift to housing need is required.	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.
MK Council	AVDC	The impact of MK economy should be recognised and the published MK report (from Bilfinger GVA?) referenced	Milton Keynes is a different HMA. High jobs growth in Milton Keynes is likely to dilute jobs growth elsewhere
Woods Hardwick (00912b)	AVDC	AV plan needs to take account of MK strategy for economic growth	
Capita Property and Infrastructure (06934a)	AVDC	"The HEDNA conclusions on employment growth are reasonable, setting a requirement for approximately 100 hectares employment land between 2013-2033, as well as confirmation that a total of 77 hectares land already benefits from planning permission for employment land uses."	This is referring to the wrong HEDNA

Objectively Assessed Housing Need

Background context:

This chapter extends the demographic projections in Chapter 2 by considering a wider range of factors to determine the Objectively Assessed Need. Similar comparator areas for market signals are identified and the data evaluated. The chapter then carefully considers any necessary adjustments to the demographic projections to consider both market signals and the need for more workers to fill projected jobs growth. The chapter considers the impact of commuting, the

impact of double jobbing and also the impact of changes in unemployment. The evidence points to a need for a 10% uplift in dwelling numbers in Aylesbury Vale to address market signals and a further uplift to address a shortfall in worker numbers, while the Wycombe, Chiltern and South Bucks area requires a 20% uplift in response to market signals.

Summary of responses received:

Response from	To	Comment	Reply
Market Signals			
Barton Willmore (for Scott Properties)	CDC/SBDC	The "adjustment for market signals is considered reasonable", but should be applied "to the demographic-led need as evidenced by the Eastleigh Local Plan decision" or at least to the starting point estimate (2012 projections)	Noted, but ORS consider their demographic projections more robust
Barton Wilmore (for Copas Farms)	CDC/SBDC	"The HEDNA adjustment for market signals is considered reasonable." but "...should be applied to the demographic-led need as evidenced by the Eastleigh Local Plan decision..."	Noted, but ORS consider their demographic projections more robust
Barwood Land Ltd - Chilmark Consulting Ltd (06882)	AVDC	"The range of adjustments made by the CB HEDNA accords with the guidance in the NPPG (at Section 2a)", but some concerns	Noted
Barwood Land Ltd - Chilmark Consulting Ltd (06882)	AVDC	Shortfall in delivery significant over the previous 10 years; Para 19: Inspectors have confirmed persistent under delivery and AV have needed to apply a 20% 'contingency buffer' (Example inspection: Co-joined Appeals, Aylesbury APP/J0405/A/12/2181033; Land off Chapel Drive, Aston Clinton APP/J0405/A/13/2210864). Para 20: 20% uplift not sufficient to make up for long term under delivery.	This seems to be conflating the 20% uplift for market signals with a 20% buffer for persistent under-delivery which are different things
Barwood Land Ltd - Chilmark Consulting Ltd (06882)	AVDC	Agrees with approach, but: differential of 10% in AV and 20% in Wycombe and Chiltern is "contrived" and fails to reflect affordability issues in AV (para 27). // LQ affordability ratios don't justify the different uplifts (para 28). // Uplift should be 20% (para 29)	Noted, but the figures for Aylesbury Vale are different than for its sub-housing market.
CBRE for Biddulph (Buckinghamshire)	CDC/SBDC	It would be "useful for the HEDNA to provide some analysis of how far a 20% upward adjustment would be sufficient to address the area's significant affordability problems". No evidence is provided that 20% will have an impact on affordability.	The market signal adjustment is one chosen to be consistent with elsewhere. It doesn't seek an explicit affordability change and PPG cautions against seeking this.
Chiltern Society	WDC	Question the "rationale for uplifting the housing numbers because of a theoretical shortfall of new workers against forecast jobs growth" for three reasons: (1) the economic and jobs forecast overstates the "realistic outcome" (see point above); (2) some current out-commuters could fill the new local jobs and this "would be a desirable not an undesirable outcome"; (3) "we can find no explicit requirement in the NPPG requiring such an uplift"	The jobs forecast are a best estimate which acts as a basis for planning. Changes to commuting ratios are allowed for in the model. A reduction in out-commuting is possible. PPG paragraph 18 requires local authorities to seek to have consistency between jobs and workers.
Chiltern Society	WDC	The uplift is "based heavily on a comparison with actual affordability ratio, house prices and rent levels in Eastleigh", the NPPG suggests the focus should be on "trends rather than raw comparisons between less and more expensive areas". Figure 108 of the HEDNA suggests the "affordability ratio has improved in Central Bucks in the 2008-13 period, and that house prices and rents have risen less than in other parts of	The uplift is based on observed market signals. The Eastleigh comparison is a useful point of reference for the correct scale.

Response from	To	Comment	Reply
		the south-east". In the context of an overheated housing market in the south east and no information on trends in Eastleigh, "no convincing case has been made" for 10-20% uplift. // It is important to re-visit the uplifts as they have a bearing on Aylesbury, the figures for the Housing Market Area as a whole, and "the interim 5-year supply figure being used prior to the adoption of the emerging Local Plan".	
DLP Planning - McCann Homes (07057b)	AVDC	Reviews CB HEDNA and notes: "The ... CB HEDNA starts at a point where the impact of a decade of undersupply is already impacting on affordability (i.e. 2001)"; the use of comparator areas "is not supported as a sound basis" to consider market signals, but gives no reason for that; it is unreasonable to uplift by 20% in two districts and 10% in AV in the same HMA; the household formation rates used should be adjusted to take account of previous under provision.	Market signals must be compared to similar areas. This was heavily discussed at the Cheshire East Local Plan.
DLP Planning - McCann Homes (07057b)	AVDC	Conclusion: Uplifting by 20% would "be appropriate to meet the objectives of the Framework including paragraph 17 and 50 i.e. providing a significant increase in the supply of housing and to secure improvements in affordability and widening access to home ownership".	Noted, but ORS do not agree
Gladman Developments	CDC/SBDC	The market signals uplift and the economic growth adjustment should be applied separately (para 2.2.19)	Do not agree that cumulative uplifts should be applied, but would note that if we apply a jobs uplift we also uplift for concealed families.
Gladman Developments - Regeneris report	WDC	As response to AV, with the conclusion: "If it is the case that there should be a 20% uplift to address adverse market signals plus an adjustment for economic growth, this would result in an OAN of around 800 per annum (16,060)." (para 3.78)	Do not agree that cumulative uplifts should be applied but would note that if we apply a jobs uplift we also uplift for concealed families.
Gladman Developments (07075a) - Regeneris report	AVDC	Key issue: the market signals adjustment for AV seems to have conflated adjustment for employment growth with adjustment for market signals by concluding that the economic growth adjustment (2,300) will tackle affordability (para 3.88). A 10% market signals uplift should be applied on top of the economic growth uplift (para 3.91). // Specific points: Para 3.58: "it not clear why ORS/Atkins does not use the full historic data sets provided by DCLG in the data sources it uses. It is sensible to use the longest reference period available to assess how house prices and affordability have changed." - Affordability problems in the 2000s have roots in the 1990s price acceleration. // House prices data used is to 2013, but Land Registry data since show worsening affordability (para 3.59). //	Do not agree that cumulative uplifts should be applied but would note that if we apply a jobs uplift we also uplift for concealed families.
High Wycombe Society	WDC	Uplifts for migration, second/unoccupied homes and market signals are not appropriate. // The starting point is CLG household projections. Quotes NPPG and says: "sensitivity testing for these factors is optional". The HEDNA "applies a series of large increases to the CLG figure". (1) Migration trends and allowance for second and unoccupied dwellings "increases should be eliminated since they are not required". (2) "The market signal associated with undersupply relative to demand is the rate of rise in house prices (or rents etc.) not the level of those prices". House prices will always be higher in the South-East and "there is no Government policy to reduce the level to what it is in other parts of the country". The 20% uplift should be eliminated completely; "it has no basis in the guidance and ... results from a misunderstanding of it".	Second homes were tested in a High Court judgment, Kings Lynn v SSCLG and the judge found that they should be included. The migration and market signals adjustment are both consistent with PPG.

Response from	To	Comment	Reply
High Wycombe Society	WDC	The "alternative" to the market signals, balancing jobs and workers (not applied to Wycombe) is flawed as it assumes: "that as the objectively assessed housing need increases, the numbers commuting in and out will increase in the same proportions".	We are not clear why this is considered to be flawed. The approach has been accepted elsewhere.
Howard Sharp & Partners	WDC	20% uplift is not enough to adjust house prices down sufficiently. Some households will be caught unable to afford market housing and not eligible for affordable housing. Additional provision is needed, but intermediate housing will not help - "it requires a market housing solution", eg starter homes.	A 20% uplift is very high. It is consistent with the highest rates used across the country.
Member of Public (Robert Gill)	CDC/SBDC	The assumptions behind the 20% uplift for market signals due to price pressure are "fatally flawed because they are based on a statistical comparison without taking into consideration the type of properties concerned. Chiltern has few flats or small houses and many very large properties with correspondingly high prices". The 20% uplift is not justified; reduce to 10%.	The market signals in Chiltern are extremely poor and require a very significant uplift.
Pegasus - Lightwood Strategic (06824)	AVDC	Support the analysis (Para 4.26) and uplift of 10%-20% (para 4.27). But an "important indicator missing: affordability of lower quartile rents" (para 4.26)	Noted, agreed and will be addressed in the updated HEDNA
Persimmon	AVDC	Market signals: the uplift of 10% should be increased to 15% or 20% to address affordability	The market signals for Aylesbury Vale are not as poor as for the remainder of the wider HMA
Carter Jonas and Januarys (06941b)	AVDC	"The HEDNA recommends that an uplift of 10% to the housing requirement for AVDC to take into account market signals. We conclude that this level of adjustment is broadly correct."	Noted
Kemp and Kemp - Monor Oak Homes (06943a)	AVDC	Para 2.2: "The estimated uplift of 10,000 new dwellings is supported."	Noted
Nathaniel Lichfield - CEG (06858)	AVDC	"CEG also note some shortcomings in the market signals assessment; however, the HEDNA concludes on a reasonable level of uplift to address these."	Noted
Persimmon	AVDC	Affordability: HEDNA Figure 104 shows LQ house prices in AV risen by £50,000 over 10 years - adjustment 15% - 20% needed to 'reflect the significant scale of affordability issues in' AV	Market signals are based on the relative performance of the housing market and the figures for Aylesbury Vale are consistent with those used elsewhere in the country.
Meeting unmet need from elsewhere			
Woods Hardwick (00912b)	AVDC	Needs to take account of needs in neighbouring authorities and London, particularly MK through DtC. // Topic Paper on Housing Growth needs revising from 2013 to 2015 HEDNA	The impact of London and neighbouring areas is already considered. Any unmet need does not form part of the OAN but would need to be considered when establishing the housing requirement and housing target
Affordable housing need			
David Lock Associates - Hallam	AVDC	OAN unsound so AH unsound; assessment starts at 2001 after a decade of undersupply; 10% OAN uplift for AV and 20% for others is unreasonable - should be 20% to increase affordability. OAN should be higher	See comments on the OAN

Response from	To	Comment	Reply
Land Management (06327b)		to reflect AH need	
Gardner Planning - Arnold White Estates (06338d)	AVDC	Concludes re: ORS and GLH; "both HEDNAs make a case for a high number of affordable homes which does not seem to be reflected in the OAN, so there seems to be a case of revising both figures upwards"	The affordable housing need in the ORS is included in the OAN. The GL Hearn study is more complicated because they state that the figure ORS have calculated can't be calculated and don't consider their affordable housing figure to be part of the OAN.
Persimmon	AVDC	AH: Seem to accept the figures in the HEDNA. Argue the importance of market housing to deliver AH. Argue for a 'a plan-wide viability assessment' to assess whether AH will be delivered // for AV to be flexible on AH requirements by site // for tenure mix including discussions without a full viability assessment, especially with the move to Starter Homes	Noted
Employment trends			
Barton Wilmore (for Copas Farms)	CDC/SBDC	The adjustment for job growth should use workforce jobs rather than full time equivalent. March 2015 Experian 'workforce jobs' = 356pa; FTE = 212pa.	Noted and more details will be provided in the forthcoming update
Barton Wilmore (for Copas Farms)	CDC/SBDC	The HEDNA should use CE forecasts as well as OE and Experian "... in line with the triangulated method which found favour with the Local Plan inspector in South Worcestershire"	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.
Barwood Land Ltd - Chilmark Consulting Ltd (06882)	AVDC	Does not use all three models and does not explain why OE only is used. // Does not take account of transport improvements on employment growth (paras 22 & 23)	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.
Barwood Land Ltd - Chilmark Consulting Ltd (06882)	AVDC	GLH is preferable	Noted
Barwood Land Ltd - Chilmark Consulting Ltd (06882)	AVDC	Para 9: "no clear rationale or justification for the choice of Oxford Economics forecast over Experian"; Experian may be more robust "given the committed transport infrastructure and economic investments anticipated in Aylesbury Vale over the plan period". GLH 'synthesis' approach of three models is more balanced. Para 15: local economic drivers also need to be taken account of, as GLH do, for example: East West Rail, Duelling of the A421 and the Aylesbury Eastern Link Road, Arla Dairy at Aston Clinton, Silverstone expansion. CB HEDNA "undertakes no sensitivity economic projection or alternative growth forecast to account for these". Para 18: it is possible to establish both the timeframes for delivering these projects and the economic impact.	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.

Response from	To	Comment	Reply
Barwood Land Ltd - Chilmark Consulting Ltd (06882)	AVDC	Para 12: says that para 7.37 of CB HEDNA indicates that: "employment-led adjustment is a combination of both Oxford and Experian scenarios"	Both forecasts were commissioned, but Experian was not used.
CBRE for Biddulph (Buckinghamshire)	CDC/SBDC	"further information is required to fully enable the robustness and reasonableness of relevant assumptions to be tested:" (1) "How the preferred jobs growth figures for CDC and SBDC (5,200 and 9,300 respectively) compare with the long term past performance of the area in terms of job creation."; (2) "Whether the assumptions about economic activity rate changes in the HEDNA ... are fully justified. It is considered that these may be too high."; "What assumptions about changes in commuting are applied..." PAS warns of the risk in assuming commuting patterns change. // The adjustments for economic growth and market signals are applied in a single adjustment and should be applied separately.	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops. The economic activity rate and commuting assumptions are the same has used in the recently accepted Cheshire East Local Plan
Chiltern Society	WDC	OE forecasts should be replaced by historic trends, as: "an approach based largely on discussions with businesses and the property sector will contain an aspirational element, leading to inflated forecast of need". "a scenario lying somewhere between the Oxford Economics forecast and the historic trend would be more appropriate"	The forthcoming update will include more information on jobs and workers. We consider the trend rates are very important and often overlooked.
David Lock Associates - Hallam Land Management (06327b)	AVDC	Too low. Half the level of EEFM; lower than all projections in GL Hearn 2015; Hearn takes into account local economic drivers such as the LEP objectives; should consider planned investments; MK Plan makes no reference to increase homes comparable to workers - they may need to be housed in surrounding LAs; no allowance made for increased out commuting to AV from MK	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.
Gardner Planning - Arnold White Estates (06338d)	AVDC	GLH study more robust as has a "better target for employment potential". GLH = 26,500. Add 10,000 for unmet need of adjoining areas, subtract 8,000 committed supply, tot = 26,500+10,000-8,000 = 28,500	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.
Gardner Planning - Arnold White Estates (06338d)	AVDC	GLH study clearer (ORS summary of OAN at Figure 2 of HEDNA criticised), and more realistic as takes account of need from London and 1% higher job growth	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.
Gardner Planning - Arnold White Estates (06338d)	AVDC	GLH figures preferred as being "more positive" and leading to a higher OAN: "Economic growth is to be encouraged and the higher aspirations of GLH are to be commended". No further argument put forward	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.
Member of Public (Robert Gill)	CDC/SBDC	The overall increase in employment to yield 33,400 extra jobs in the Buckinghamshire HMA over 2013-33 is a straight line projection. "In that period there is bound to be at least one cyclical recession but no allowance has been made for this with year on year growth being used instead".	The forthcoming update will include more information on jobs and workers. We consider the trend rates are very important and often overlooked, as is the impact of a potential recession.

Response from	To	Comment	Reply
Member of Public (Robert Gill)	CDC/SBDC	25% of the workforce commute. No account is taken of these people taking some of the extra jobs: "...many of these commuters would be only too happy to work locally given the high cost of commuting, particularly to London... Some of the forecast new jobs would be filled by local people who are currently commuting and the increase in housing to balance housing and new jobs reduced. There is little doubt that there will be an increase in employment levels in the Plan period but, again, increases of the magnitude forecast are not believable and should be reduced to the historic average."	The forthcoming update will include more information on jobs and workers. We consider that changes in commuting patterns are very important and often overlooked.
MK Council	AVDC	"The economic growth figures should be realistic and deliverable. They should be fully substantiated and justified by up to date robust evidence."	The forthcoming update will include more information on jobs and workers.
Nathaniel Lichfield - CEG (06858)	AVDC	Notes that the economic forecast is below the forecast of "the previous HELAA (dated June 2015)". The importance is stressed of fully considering economic potential and building enough housing.	The forthcoming update will include more information on jobs and workers.
Nexus Planning - Inland Homes (06485 a)	AVDC	Stresses the importance of economic growth - paras 3.7 & 3.8 note NPPF para 19; "significant weight should be placed on the need to support economic growth through the planning system"; para 3.9 Bucks HEDNA employment forecast is lower than all three main forecasters "relied on in the GL Hearn Aylesbury Vale HEDNA, which was only published a matter of months ago and was demonstrably more robust" // Essential to include need from London - GLH say 28 dpa (paras 3.11 & 3.1 {sic})	The forthcoming update will include more information on jobs and workers. The needs from London do not need to be added because they are already included
Nexus Planning - Inland Homes (06485 a)	AVDC	GLH approach using 3 models is "far more robust approach given the variances in economic forecasting" (para 6.1) than Buck HEDNA using 1, which gives a lower figure than all three models. It is vital for AV to "interrogate this differential" between the two figures (para 6.3).	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.
Pegasus - Edward Ware Homes (06824)	AVDC	GLH uses three models; ORS one. GLH then accounts for "committed projects" ("a significant factory expansion and F1 project")	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.
Pegasus - Lightwood Strategic (06824)	AVDC	Compares figures against GLH and states: "HEDNA's decision to select the lower jobs projection should be explained and justified" (para 4.24). // For AV's 'policy on' consideration - HEDNA doesn't refer to LEP, AV Economic Strategy to 2026 or GLH higher jobs numbers (para 4.25)	The forthcoming update will include more information on jobs and workers. However, we would note that the figures used are above trends and were subject to stakeholder workshops.
Member of Public (Robert Gill)	CDC/SBDC	Chiltern has an uplift of 752 households; South Bucks has a reduction of 902. This "is not justified and illogical. Indeed, for Buckinghamshire as a whole, the uplift is only 305 (0.74%) whilst that for Chiltern is 752 (16.5%). Variations of this magnitude are just not believable. There is no justification in applying this uplift and it should be reduced to 0.74% in line with the County average."	The issue in this case is the correction of problems with ONS data. This has a differential impact across different areas. ORS have treated all areas consistently and the impact is to increase the dwelling need in Chiltern above CLG household projections, but this reflects issues with the data in the CLG household projections.
Overall conclusions			

Response from	To	Comment	Reply
Barton Willmore (for Gallagher 06133b)	AVDC	Market Signals: Uplift should be 86% (para 3.28) to lower housing price inflation in line with Barker Review.	The Barker Review did not suggest an 86% uplift to household projections. It suggested an 86% uplift from rates of development. This would give a national target of around 250,000 dwellings per annum which is consistent with ORS's figures.
Barwood Land Ltd - Chilmark Consulting Ltd (06882)	AVDC	Para 11: the estimated 10,000 additional dwellings for un-met need should be treated as a minimum in order to ensure housing needs are fully met; concerns about the housing requirement has been calculated and difference with GLH	Noted
Persimmon	AVDC	Backlog: cumulative backlog from 2001 to 2015 = 1325. 'recent appeal decisions that suggest past delivery rates should be considered over a longer period as this means economic cycles are taken account of' and 'inspectors have considered' adding a 20% buffer	The HEDNA resets the clock on the backlog of need, but not on the 20% buffer issue which it does not address.
Barton Willmore (for Gallagher 06133b)	AVDC	Two HEDNA produced close together, different conclusions	Noted, but ORS consider their figures are fully justified and robust
Barwood Land Ltd - Chilmark Consulting Ltd (06882)	AVDC	Model lacks transparency (para 1) - the methodology is required. // ORS and GLH assessments differ with "no change to the relevant NPPG guidance" (para 5). // Para 6: CB HEDNA: ignores backlog on the housing register; CB HEDNA takes a narrow, "welfare" based definition while GLH uses reasonable preference groups, which "the Council has a statutory duty to house";	The ORS HEDNA does not ignore the backlog of affordable housing need. This is addressed from page 79 onwards. Reasonable preference groups are used.
Barwood Land Ltd - Chilmark Consulting Ltd (06882)	AVDC	Para 26: Unclear why GLH previously used, now put aside; Such a material and significant change in approach and policy must be fully and clearly explained	The requirement for a consistent OAN at the HMA level meant that the previous model had to be put aside.
Buckinghamshire County Council (06926)	AVDC	Note that: the estimate for unmet need is subject to change when "the respective authorities have completed their evidence studies" and the "housing figure" {target?} may need to change to take account of unmet need. Luton HMA covers part of AV and Luton's unmet need "may have an implication for housing allocations in adjacent planning authority boundaries". Av also needs to work with MK.	This is part of the Duty to Cooperate discussion, not the HEDNA
Carter Jonas and Januarys (06941b)	AVDC	Paras 35-37: ORS conclude 21,300 + unmet need; DLP, June 2014 (for South West MK consortium) concluded 24,633; GLH 26,520, both used a different HMA to ORS.	Agreed, a combination of different HMA and different assumptions gives this result.
CBRE for Biddulph (Buckinghamshire)	CDC/SBDC	Berkshire SHMA and Bucks HEDNA reach different conclusions on OAN and Affordable Housing need in South Berks.	This is due to different assumptions being applied.
CBRE for Biddulph (Buckinghamshire)	CDC/SBDC	Parts of South Bucks and Aylesbury Vale lie outside of the Bucks HMA. "Therefore, the OAN figures for the Buckinghamshire HEDNA do not yet represent the full OAN for the area it covers." AVDC and SBDC should take this into consideration in the next stages of the Local Plan.	The OAN is calculated at the local authority boundary so there are no needs which are not addressed

Response from	To	Comment	Reply
Chiltern Conservation Board (06970b)	AVDC	The HEDNA methodology uplifts at every step, sometimes illogically, eg: the uplift for affordability (10% in north, 20% in south) takes no account of the difficulty of delivering in the more expensive south which has Chilterns AONB and green belt restrictions. "If these are transferred to cheaper areas in North Bucks then less uplift is needed (10% not 20%), so the total number needed to be transferred can be smaller."	The OAN must be policy off - i.e. it cannot constrain for delivery pressures. The overall need must be met in the HMA or be picked up by a neighbouring HMA.
Chiltern Conservation Board (06970b)	AVDC	HEDNA figures should be adjusted downwards to reflect constraints "like the nationally designated Chilterns AONB landscape". The constraint on development in the AONB "will require a spatial distribution which avoids AONB land" and neighbouring authorities covered by the AONB may have unmet need due to these constraints.	The OAN cannot be reduced due to constraints.
Chilterns Conservation Board	CDC/SBDC	The round figure for the HMA OAN (55,000) "suggests adjustment and rounding rather than accuracy" (para 7).	The figure is rounded
Crest Nicholson - Shenley Park (06929b)	AVDC	Para 7: presents two figures from GLH - 22,240 (before economic considerations) and 26,520 (after economic considerations) and from CB HEDNA (21,289) and notes the AV proposed figure "reflects the Central Bucks HEDNA, but that this is below two of the projections from their own commissioned HMA research".	Noted. The first two figures used different assumptions to get to their final OANs.
DLP Planning - McCann Homes (07057b)	AVDC	Paras 4.11-4.14; using 2012 household projections and a 3% vacancy rate, these paragraphs attempt to show that housing demand/need in previous strategies (including the RSS) was too low. // Paras 4.15-4.31 review some recent SHMAs to demonstrate need from other LAs, notably MK. // MK SHMA 2014: (1) SMHA used 2011 household projections; SNPP 2012 shows higher population (para 4.18); (2) EEFM shows greater jobs growth that used in the SHMA and dismisses the argument that the 2001-2011 shows a lower jobs growth, partly as it is a "(recession influenced trend)" (para 4.21). Points to Experian report (2012) which rates MK as "having the highest growth prospects for both jobs and output"; (3) If MK is to meet the EEFM or a higher aspirational target, requires an extra 410 dpa (para 4.28) without taking 2012 household projections into account. // Luton & C Beds SHMA update 2015: Use of 10-year migration which reduces CLG dwellings requirement and affordability uplift with a final figure still below CLG dwellings - implied criticism, but no explanation why they are wrong. Luton policy is to delivery fewer dwellings than the ORS OAN says.	These are a confusing set of points. We think much of this comes back to the issue of where is the HMA and then what assumptions are to be used in calculating the OAN.
DLP Planning - McCann Homes (07057b)	AVDC	Considers the Luton & MK HMA and individual LAs. Uses ONS data showing ratio house price to earnings to conclude that "mean house prices have raised substantially" with AV having the highest ratio (but see data in 'DLP Table - affordability' tab) (para 6.2). Presents charts showing mean house prices (No sources or indication of inflation-adjustment given) and LQ price to earnings over time that show AV and C Beds similar or higher to South East, with other LAs lower. Concludes: "the affordability of housing on the edge of the South East is another factor influencing both past and future migration patterns. This further informs the view that there is and will continue to be a high demand for housing in the HMA" (para 6.4). Then quotes a House of Commons note saying the 10 years since the Barker review have been a lost decade and restricting supply through the planning system prolongs the house price problem.	ORS consider that this is irrelevant because the wrong HMA is being used.

Response from	To	Comment	Reply
Home Builders Federation	AVDC	"the Council is using ... the lowest employment forecast available other than the trend-based projection...it would have been sensible to use a synthesis similar to the approach adopted in the GL Hearn report"	It is a very important point to note that the employment forecast is above trend. PPG refers to using trends or forecast models.
Home Builders Federation	AVDC	Uplift required for London, as GL Hearn do: 28 dpa	ORS do not agree. London migration is already considered.
Home Builders Federation	AVDC	Consider an uplift to OAN to make AH delivery viable across all sites (as many smaller sites will not deliver)	This is a policy choice in line with paragraph 29 of PPG
Nexus Planning - Inland Homes (06485 a)	AVDC	Discursive. Main points: para 2.6: 4,231 difference between ORS and GLH needs to be considered in detail, but "has occurred because of contrasting approaches relating to employment projections" // lowering by c5,000 homes is significant for AV plan and could limit economic growth - Para 2.7 states: 'the NPPF's key priority is for local plans to "significantly boost housing supply"' // para 2.8: OAN should make provision for unmet need elsewhere in the HMA; higher housing in AV would support growth in the workforce. // Paras 2.9-2.10: 10,000 from other LAs doesn't include Wycombe or South Bucks which are constrained for development.	The HEDNA is an internally consistent position across Buckinghamshire. The GL Hearn study was only for part of the HMA and used different assumptions, many of which are simply illogical.
Persimmon	AVDC	Two HEDNA produced close together, different conclusions: use the higher figure - 26,520 (GL Hearn 2015), then uplift for DtC to 36,500	The HEDNA is an internally consistent position across Buckinghamshire. The GL Hearn study was only for part of the HMA and used different assumptions, many of which are simply illogical.
Wokingham BC	WDC	"Clarification is sought on why the Central Bucks HEDNA does not take into account all three main factors when calculating the OAN for the three local authorities of Aylesbury Vale, Wycombe and Chiltern and the OAN for Central Buckinghamshire HMA." The response states these have not been taken into account: Affordability adjustment for AV; employment-led need for Chiltern and for Wycombe. Also not taken into account; suppressed household formation rates and notes: "Figure 109 shows the suppressed household formation rate being taken away rather than added into the equation to calculate the overall OAN. Therefore the OAN for the three Central Buckinghamshire authorities and Central Buckinghamshire HMA has been calculated inaccurately."	All factors have been taken in to account. The larger of the job and workers or market signals uplift was used. However, if a jobs uplift was applied we also addressed the needs of concealed families separately. These uplifts are not cumulative and suppressed household growth is part of the market signals.
Wokingham BC and Reading BC	CDC/SBDC	Clarification sought on: "There is inconsistency between the narrative on page 155 and 156 and figure 123. The text mentions that suppressed household formation rates have been calculated into the overall OAN. However within Figure 123, suppressed household formation rates are omitted from the final OAN."	Suppressed household formation rates are part of the wider market signals uplift. They are not part of a cumulative uplift. If we apply a jobs uplift then we also address the needs of concealed families separately.
Wokingham BC and Reading BC	CDC/SBDC	Inconsistency between reports: Buckinghamshire HEDNA OAN for South Bucks = 352 dpa; Berkshire (including South Bucks) SHMA OAN for South Bucks = 376 dpa.	Different assumptions were used in the models.
DLP Planning - McCann Homes	AVDC	Conclusions: (1) AV is next to MK, one of the fastest growing UK economies. If the EEFM projections are right there will be a shortfall of 410 dpa to meet the growth; (2) Luton OAN will not be met by their policy.	They are different HMAs. Milton Keynes is a HMA as is Bedford, while Central Bedfordshire and Luton are another

Response from	To	Comment	Reply
(07057b)		The shortfall will need to be discussed through DtC and "shortfalls in Luton will increase demographic pressures in the south of Central Bedfordshire and have a ripple effect into Aylesbury Vale."; (3) These could lead to a shortfall of 965 dpa "in the wider HMA" and higher still if the rebasing of AV and Luton & C Beds housing projections which brings them below 2012 CLG projections is wrong.	HMA. This has been tested at planning appeals and the Central Bedfordshire EIP.
Capita Property and Infrastructure (06934a)	AVDC	"The objectively assessed housing need projections provided within the HEDNA are appropriate following the approach set out by national Planning Policy Guidance. The HEDNA conclusions on potential growth correctly take in to account demographic projections, economic growth potential, and affordability." // "The fully objectively assessed housing need of 1,326 dwellings per annum, as recommended within the HEDNA is supported, representing a far more accurate and true reflection of housing need within the District than as originally set out in the, now withdrawn, Vale of Aylesbury Plan"	This is referring to the wrong HEDNA
Howard Sharp & Partners	WDC	"We broadly support the identification of a housing requirement of 15,011 dwellings for Wycombe District (751 dwellings per annum) and the approach which takes seriously market signals and the balancing of jobs and workers."	Noted
Kemp and Kemp - Monor Oak Homes (06943a)	AVDC	Para 2.1: "the consultants appear to have followed guidance set out in the National Planning Practice Guidance (NPPG) in so far that it: Uses Government Population Projections as a starting point. / Makes adjustments for local demographic factors and migration trends. / Makes provision for employment trends and economic forecasts. / Considers market signals such as land prices / house prices and rents."	Noted
Nexus Planning - Inland Homes (06485 a)	AVDC	Para 2.3: "Our comments below relay our initial assessments and we propose to review the conclusion on objectively assessed need ("OAN") in further detail as the Local Plan progresses"	Noted
Pegasus - Edward Ware Homes (06824)	AVDC	"the methodology establishing the level of uplift seems robust."	Noted
Pegasus - Lightwood Strategic (06824)	AVDC	"...support the general approach undertaken in the Housing and Economic Development Needs Assessment (HEDNA)" but concerns over some details	Noted
Plato Estates	CDC/SBDC	"we have had little opportunity to scrutinise the HEDNA which we note was only published in late January of this year. In the limited period of time available to examine this important document, we question some of the methodology & assumptions used that reached the aforementioned conclusion of need (7,300 new homes and 2 hectares of employment land) within Chiltern District."	Noted
St Albans Diocesan Board of Finance - Bidwells	CDC/SBDC	Have some concerns "over the evidence base to establish the Objectively Assessed Need, and whether this reflects an accurate picture of the fully assessed housing need, in view of the historic delivery of housing and the lack of supply of affordable housing within the districts", but limit their comments to "the Board's land at Chesham."	

Response from	To	Comment	Reply
Crest Nicholson - Shenley Park (06929b)	AVDC	Para 1: At this early stage, generally "supportive of the emerging quantum" of development (31,000 over the plan period).	Noted
DLP Planning (07055 b)	AVDC	The OAN is unsound, therefore the AH is unsound.	
Pegasus - Revera Ltd (06823b)	AVDC	Support the increase in OAN in HEDNA (1,065 dpa) compared to previous local plan (675 dpa) and 10,000 unmet need for neighbouring LAs, but reserve right to make later representations as Local Plan develops	Noted
Slough	CDC/SBDC	Para 1.9: Re the ORS OAN of 354 dpa; "Further representations may need to be made about this in due course but in the meantime it is considered that the housing needs figure provides a pragmatic basis for preparing the Local Plan."	Noted

Housing Requirements

Background context:

This chapter considers how the OAN can be converted into planning policy and also the role of particular groups in the population in the OAN.

Summary of responses received:

Response from	To	Comment	Reply
Policy response to identified housing need			
Persimmon	AVDC	AV plan for 30,000 houses 2013-33 too low. AV needs to deliver more due to potential unmet need in Wycombe and Chiltern in the HMA	Noted, but not an issue for the HEDNA
Bidwells - Davidsons Developments (06577 b)	AVDC	AV will need to plan to deliver some unmet need from MK	This is a different HMA and would be subject to duty to cooperate talks.
Pegasus - Edward Ware Homes (06824)	AVDC	Unmet housing needs from adjoining HMAs needs to be considered in Local Plan: "... it is recognised that a 'best fit' HMA is an appropriate basis upon which to proceed", but Edward Ware have 2 sites outside of 'best fit' HMA - in MK and Oxfordshire HMAs	Noted, but not an issue for the HEDNA
Persimmon	WDC	Representations already made to AVDC. // Clarity required between LAs on unmet need: No details or any agreement under the DtC for homes to be 'reallocated'. The 10,000 homes to be delivered by AV cover 6,000 from Wycombe and allows 4,000 from Chiltern. That makes no allowances for any undelivered homes required within South Bucks, MK, Oxfordshire or Central Beds, all of whom AV have a DtC. If AV	Noted, but not an issue for the HEDNA

Response from	To	Comment	Reply
		provide any homes for MK unmet need then more homes will be allocated in AV or fewer from Wycombe and Chiltern being delivered in AV. "It is therefore unfair for Wycombe District and Chiltern District to presume the 10,000 additional homes Aylesbury Vale are delivering are solely for the benefit of Wycombe and Chiltern." "There should be clarity between all authorities, presented publicly, which demonstrates that all authorities are meeting the optimum number of homes within their own administrative boundaries and the additional unmet need can be delivered within adjoining authorities."	
Rushmoor BC	WDC	Note "Wycombe identifies a housing shortfall of about 6,000 homes at this stage"; "potential additional housing capacity is available in Aylesbury Vale to meet needs across the HMA. All these options must be fully explored before Wycombe suggests that other HMAs are approached to meet any unmet needs".	Noted, but not an issue for the HEDNA
Barton Wilmore (for Copas Farms)	CDC/SBDC	There are two OANs. Para 47 of NPPF requires the latest published evidence to be used and this is (GLH) 376 dpa, but the local plan uses the lower figure of 355dpa (Bucks HEDNA). "... further works needs to be undertaken, through the Duty to Co-operate process, to understand the housing needs of South Bucks District before the Local Plan progresses to adoption".	The figure of 376 was obtained from different assumptions and is the older of the figures.
Barton Wilmore (for Copas Farms)	CDC/SBDC	"...it is premature to identify a significant unmet need of 7,500 dwellings prior to the finalisation of the Green Belt Assessment and HELAA" to assess capacity for building in Chiltern and South Bucks. Chiltern and South Bucks should "make every effort to meeting their full OAHN within the existing administrative boundaries".	Noted, but not an issue for the HEDNA
Bidwells - Davidsons Developments (06577 b)	AVDC	No criticism of HEDNA, but; "the emerging VALP should consider housing growth above projections if deliverable because of the potential for increased economic growth in the District."	Noted
Bidwells - Davidsons Developments (06577 b)	AVDC	No criticism of HEDNA, but; "the emerging VALP should consider an 'up to' percentage figure for affordable housing as not all development will be capable of delivering the full requirement."	Noted
Capita Property and Infrastructure (06934a)	AVDC	The assessed need of 1,326 dpa should be a minimum and the Local Plan should aim for development "considerably above this requirement" for "strategic growth". // Supports requirement for housing in Aylesbury town centre.	We think that this refers to the wrong HEDNA
Capita Property and Infrastructure (06934a)	AVDC	The 10,000 for unmet need to be delivered in AV is likely to be too low. Until a more accurate figure is available, a "cautious and flexible approach should be taken to account for housing requirements comprising unmet need from neighbouring authorities".	We think that this refers to the wrong HEDNA
Capita Property and Infrastructure (06934a)	AVDC	While the figure of 412 AH dpa "is appropriate", the mechanism of delivery and target in the Local Plan should be flexible, especially on differing sites. Targets should not prohibit development on a particular site.	We think that this refers to the wrong HEDNA
Carter Jonas and	AVDC	Paras 38-39: Unmet need from London should be included - June 2014 DLP concluded "at least an additional 6,965 dwellings would need to be accommodated in the DLP-defined HMA to meet unmet	All migration trends have been considered. No further uplift is required. If any other HMA wishes for the area to take

Response from	To	Comment	Reply
Januarys (06941b)		needs from London" over the next 20 years. // Unmet need from MK should be considered; "Central Bedfordshire Development Strategy Examination shows that it is not acceptable to submit a plan where unmet needs from neighbouring authorities was estimated but not agreed".	some of its needs then that will be subject to duty to cooperate discussions.
CBRE for Biddulph (Buckinghamshire)	CDC/SBDC	"As it stands, the Buckinghamshire HEDNA does not make any specific adjustments to its population and housing needs estimates for London growth factors". AVDC and SBDC should consider this "as the emerging Local Plan is progressed".	All migration trends have been considered. No further uplift is required. If any other HMA wishes for the area to take some of its needs then that will be subject to duty to cooperate discussions.
Crest Nicholson - Shenley Park (06929b)	AVDC	The AV HMA should be larger and incorporate MK. It is unclear whether the argument is that the HMA should incorporate other authorities such as Dacorum. Either way, AV has DTC responsibilities with MK, Luton and Central Beds, all likely to have unmet needs which should be added to the AV housing target.	The HMA has already been tested in Central Bedfordshire and at public inquires in Bedford, and Central Bedfordshire.
Crest Nicholson - Shenley Park (06929b)	AVDC	The 10,000 for unmet need to be delivered in AV is a minimum. Para 11: Chiltern letter to AV (in 2014) identifying 5,000 dwelling, with up to 2/3 in AV; Wycombe "suggests it might have an unmet need of approximately 6,000 dwellings". Therefore the AV provision for unmet needs does not include any other authorities. Para 12: AV should take unmet need of other authorities into consideration and needs to be clear how many and for which authorities. Paras 17-23: There is or is likely to be unmet need from: MK, Luton and Central Beds.	Noted, but not an issue for the HEDNA
Crest Nicholson - Shenley Park (06929b)	AVDC	Para 37: argues that the AH and CIL requirements must be assessed for their impact on viability must be assessed and included in the Plan. No figures or specific challenge to the HEDNA.	Noted, but not an issue for the HEDNA
DLA Barwood Simon Andrews (07053)	AVDC	"An assumption of 10,000 additional homes being needed under the Duty to Cooperate appears a sensible assumption at this stage." But the final amount needs to be agreed with surrounding authorities to avoid risk at examination.	Noted, but not an issue for the HEDNA
DLP Planning - McCann Homes (07057b)	AVDC	HEDNA should take account of London: the report uses London SHMA 2014 and London Plan figures and notes these are "substantially short" of CLG 2012 projections "which the remainder of the country will be using as a baseline for their plan reviews"(paras 7.8). Notes the Inspector's concern over London being unable to deliver (paras 7.10-7.11). Presents chart of completions since 1871. Concludes there will be an unmet need from London and using 2012 household projections allocates 111 dpa to AV.	The Buckinghamshire HEDNA is fully consistent with the London Plan and the migration assumptions have been agreed with the GLA.
Gladman Developments	CDC/SBDC	It is not clear how the figure of unmet need to be taken by AV (7,500 in this response) has been determined, nor that the capacity for Chiltern and South Bucks to deliver its housing need has been assessed. (para 2.2.8). // MK will also have some unmet need. in conclusion: the "HEDNA's recommended OAN figures do not give a complete picture of the full OAN for the area it covers" (para 2.2.11). // London should be taken into consideration; "Evidence produced by the GLA for the London Plan suggests that out-migration to the South East is projected to pick up strongly and return to pre-recession levels" (para 2.2.13).	The allocation of the OAN is not for the HEDNA to decide. Milton Keynes and London are different HMA and would be duty to cooperate issues.

Response from	To	Comment	Reply
Gleeson (by Vail Williams for Gleeson & Linden Homes)	AVDC	"there needs to be recognition of the points made in the assessment" and the plan needs to allow flexibility "through additional identified sites" to accommodate potential market or population changes	Noted
MK Council	AVDC	DtC: The Milton Keynes HMA (2014) suggests that 237 (MK) homes per annum should be met by AV. South Bucks need to be met by AV should also be included.	This is a duty to cooperate issue
Nexus Planning - Inland Homes (06485 a)	AVDC	Concern over Council approach of 24% AH on larger sites, 0% on small sites - the burden falls on developers with larger sites; recommends that if AV is concerned the AH can't be met, then OAN is increased	Noted. This is a policy decision in line with paragraph 29 of PPG
RB Windsor & Maidenhead	CDC/SBDC	No indication whether AV can or should meet the unmet need of others. RBWM prepared to discuss unmet need. However; RBWM intends "to meet it's own OAN, but the borough is heavily constrained... It is therefore highly unlikely that it will be able to meet the additional housing needs of adjoining authorities."	This is a duty to cooperate issue
Slough	CDC/SBDC	Para 7.11: "there is not sufficient land within the Slough Borough to meet" the Slough OAN and employment land. Para 7.13: "it is important that adjoining authorities plan to meet their needs in full, as close as possible to where these needs arise"	This is a duty to cooperate issue
Wokingham BC and Reading BC	CDC/SBDC	Clarification sought on DtC: "Chiltern and South Bucks ... may look to adjacent local authority areas such as those in Berkshire to accommodate some of its unmet need". This needs to be kept under review and discussed between LAs.	This is a duty to cooperate issue
Bidwells - Davidsons Developments (06577 b)	AVDC	No criticism of HEDNA, but; "the Council should overall increase housing delivery in order to satisfy the housing need for the elderly." Market-led development should be encouraged	Noted, but older person housing is part of the OAN with the exception of any growth in Class C2 usage
Marrons Planning for Ray Construction (06905)	AVDC	The Council should enable specialist schemes for the elderly to be provided on individual sites, rather than requiring them to be provided as part of a general housing development.	Older person housing is part of the OAN, but subject to separate planning policies
Pegasus - Anchor (06824)	AVDC	No criticism of HEDNA, but argues for AV to consider ways to develop more for older people. Evidence includes: "8 million people over 60, in 7 million homes, are interested in downsizing", but; undersupply of retirement housing prevents them moving. Also ; "one in four over 60s would be interested in buying a retirement property."	Noted, but older person housing is part of the OAN with the exception of any growth in Class C2 usage
Pegasus - Revera Ltd (06823b)	AVDC	Unclear how council will plan for C2 accommodation. Issues and options doc doesn't address the need to count older people from reducing number of C2 bedspaces	Class C2 usage is identified in the HEDNA
Bidwells - Davidsons Developments	AVDC	No criticism of HEDNA, but: "the Council should encourage greater employment growth for the District through increased delivery of housing growth"	This is a potential planning response

Response from	To	Comment	Reply
(06577 b)			
Buckinghamshire County Council	WDC	recognise the estimate for unmet need is subject to confirmation once the respective authorities have completed their evidence studies, that the "housing figure" may need to be revised following the final CB HEDNA and the DtC to agree final allocations	This is a duty to cooperate issue
Buckinghamshire County Council	WDC	recognise: "further adjustments may need to be made as a result of changes in the household or population projections"; if adjustments are made to household and population projections, then "consideration may need to be given to the level of employment provision stated in the HEDNA". "housing growth will need to respond to economic growth targets for the County, taking account of the Strategic Economic Plan."	Noted
Chilterns Conservation Board	CDC/SBDC	"The Bucks HEDNA is creating pressure for housing, economic and infrastructure development that could harm the special qualities of the Chilterns AONB." (para 3) // "The Draft Bucks HEDNA (January 2016) represents a raw 'policy-off' Objectively Assessed Need (OAN) for housing figure. It must not be used for assessing 5 year housing land supply or taken into the local plan unmodified as the housing requirement (NPPF para 14, 47; NPPG para 44 and 45 and the Ministerial Statement Dec 20141). The next stage is to develop a 'policy-on' housing requirement through the local plan preparation process, taking into account land supply and constraints to delivery." (para 4)	Noted and agreed
Gleeson (by Vail Williams for Gleeson & Linden Homes)	AVDC	Concludes the HEDNA complies with the guidance and provides the evidence required for the AV Local Plan, but the LA should recognise the limitation of the study and consider other evidence too	Noted
Gleeson (by Vail Williams for Gleeson & Linden Homes)	AVDC	AV has estimated an addition 10,000 homes over the Plan to take account of unmet need in the wider HMA	This is a duty to cooperate issue
Home Builders Federation	AVDC	Welcome the possible 10,000 dwellings for adjacent authorities' needs	This is a duty to cooperate issue
Home Builders Federation	AVDC	Discussion with Luton should be documented	This is a duty to cooperate issue
Nexus Planning - Inland Homes (06485 a)	AVDC	AV AH policies should include starter homes	Noted
Oxford City Council	WDC	"in the event that Wycombe were to look to areas within the Oxfordshire housing market area to help meet this {unmet} need, we would welcome further dialogue as that could then impact on capacity to	This is a duty to cooperate issue

Response from	To	Comment	Reply
		address unmet need from Oxford."	
Older people			
Buckinghamshire County Council (06926)	AVDC	the "needs of an additional 2200 institutional units for older people requires more specific detail with regard to the nature of provision" which takes account of affordability - "we don't want to see loads of high end expensive residential /nursing care homes that are excluding to people with lower wealth or outside the commissioning potential of Social Care."	This is part of the wider planning response to the OAN
MK Council	AVDC	"The impact of the need for local services and facilities should be discussed and agreed with the neighbouring planning authorities"	Noted
Nexus Planning - Inland Homes (06485 a)	AVDC	Notes Bucks HEDNA figure for older people = 13.3% of all new housing (para 5.1), and AV options doc suggests 15% to be adaptable. Para 5.3 states: "this figure must be backed up with an assessment of how this level of requirement will accurately support need"	Noted
Pegasus - Lightwood Strategic (06824)	AVDC	Support the analysis. Note that "the sector is expanding rapidly" and "housing requirement for these housing types should be expressed as a minimum"	Noted
Households with specific needs			
Buckinghamshire County Council (06926)	AVDC	The 22%-24% is generic and doesn't mention physical disability, mental health, learning disability (estimated 200+ units by 2035 plus reprovision of old stock).	These are all part of the OAN, but subject to separate policies
Gypsies and travellers			
Chiltern Conservation Board (06970b)	AVDC	GTAA needs review following the change of definition and likely lowering of pitch requirements	Noted and this process in on-going

Employment Land Requirements

Background context:

This chapter considers the additional land needed for employment purposes.

Summary of responses received:

Response from	To	Comment	Reply
Capita Property and	AVDC	The HEDNA "requirement for approximately 100 hectares of employment land within the District for the	Noted. More details will be provided in the forthcoming

Response from	To	Comment	Reply
Infrastructure (06934a)		2013-33" is too high. There has been a historic over-supply of employment land in AV and 77 hectares with permission exist. The Plan should consider a flexible policy using the 'employment' land for residential development where it is "unviable for employment purposes and underused or under occupied".	update
Chiltern Conservation Board (06970b)	AVDC	"The economic floorspace figures use employment densities which are not realistic in the current times of hotdesking, working from home and greater efficiencies in the use of office space. "	Noted. More details will be provided in the forthcoming update
Nexus Planning - Inland Homes (06485 a)	AVDC	Para 6.7 states: "There is an imbalance in jobs and workers in the Aylesbury sub Functional Economic Market Area ("FEMA") and this has significantly reduced market demand for employment land at this location".	Noted
High Wycombe Society	WDC	"Given that the main purpose of allocating land for employment use in the local context is to generate employment, it is important that employment land is efficiently used for that purpose", therefore preferably not warehousing and storage class use.	Noted

General Comments

Background context:

The issues below were raised in the context of the HEDNA, but did not reference a specific section.

Summary of responses received:

Response from	To	Comment	Reply
Barton Willmore (for Gallagher 06133a)	AVDC	Summary of comment on all questions; points on OAN in BW technical note (06133b) are listed here	Noted
CBRE for Biddulph (Buckinghamshire)	CDC/SBDC	"Biddulph is largely supportive of the approach taken to date with regard to the Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA)."	Noted
Nexus Planning - CEG	AVDC	Nexus-CEG 06485b is the council pro forma which refers to 06485a	Noted
Nexus Planning - Gleeson Homes	AVDC	Nexus-Gleeson 06485 a & b are identical	Noted
Nexus Planning - Inland Homes	AVDC	Nexus-Inland 06485 b is the council pro forma which refers to 06485 a	Noted

Response from	To	Comment	Reply
Barton Willmore - Catesby Estates (06877a)	AVDC	Identical to comments made in 'Barton Willmore (for Gallagher 06133b)' except Q4 - "No comment"	Noted
Barton Willmore - Ian Tant (06880b)	AVDC	Identical to comments made in 'Barton Willmore (for Gallagher 06133b)'	Noted
Barton Willmore (for Scott Properties)	CDC/SBDC	Conclusion: "if the above points are addressed it is considered the OAN for Chiltern and South Bucks could be significantly higher"	Noted
David Lock Associates - Hallam Land Management (06327c)	AVDC	Summarised in 06327b	Noted
Gladman Developments - Regeneris report	WDC	As response to AV	Noted
Barwood Land Ltd - Chilmark Consulting Ltd (06882)	AVDC	Also comment on Qs 7-11 & 13	Noted
Bidwells - Careys New Homes	AVDC	Also comment on Qs 7 to 13	Noted
Bidwells - Davidsons Developments	AVDC	Also comment on Qs 7 to 13	Noted
Buckinghamshire County Council (06926)	AVDC	Also comment on Qs: 4 & 6-13	Noted
Capita Property and Infrastructure (06934a)	AVDC	Also comment on Qs: 7, 9, 10, 13	Noted
Carter Jonas and Januarys (06941b)	AVDC	Also comment on Qs: 7, 9-11, 13	Noted
Crest Nicholson - Shenley Park	AVDC	Also comment on Qs: 7, 9, 10, 13	Noted

Response from	To	Comment	Reply
(06929b)			
David Lock Associates - Hallam Land Management	AVDC	06327a is Av pro forma copied from 06327b, 06327d is a statement of common ground, 06327e is a planning appeal (on traffic flow), 06327f a copy of the AV letter, 06327g is a site map	Noted
David Lock Associates - Hallam Land Management (06327b)	AVDC	Also comment on Qs 7, 9, 11	Noted
DLP Planning (07055 b)	AVDC	Also comment on: HELAA	Noted
Gardner Planning - Arnold White Estates (06338d)	AVDC	Also comment on Qs 7-13	Noted
Home Builders Federation	AVDC	Also commented on the Plan relating to: older people; requirements of neighbouring councils; Gypsies and Travellers	Noted
Kemp and Kemp - Monor Oak Homes (06943a)	AVDC	Also comment on Qs: 4, 7, 8, 10-12	Noted
Marrons Planning for Ray Construction (06905)	AVDC	Also comment on Qs: 7-13	Noted
MK Council	AVDC	Also comment on Qs 9+10 (DtC)	Noted
Nexus Planning - Inland Homes	AVDC	Also comment on Qs 6 to 13	Noted
Pegasus - Revera Ltd	AVDC	Also comment on Qs 7, 8, 9, 13	Noted
Persimmon	AVDC	Also comment on Qs 8-13	Noted
RB Windsor & Maidenhead	CDC/SBDC	Also comment on Qs: 2 and 5	Noted
Rectory Homes (06798)	AVDC	Also comment on Qs 7 to 11	Noted
Slough	CDC/SBDC	Also comment on Qs: 2, 4, 5, 6, 8, 10, 16	Noted

Response from	To	Comment	Reply
Woods Hardwick (00912b)	AVDC	Also comment on Qs 7 & 9-11	Noted
07055 DLP - St Francis Group Ltd	AVDC	Covered in DLP Planning - McCann Homes (07057b)	Noted
AVDC	WDC	No comments on the HEDNA	Noted
Barton Willmore - Catesby Estates	AVDC	Also comment on Qs 7-12	Noted
Barton Willmore - Catesby Estates	AVDC	06877b is site information, 06877c is a site map	Noted
Barton Willmore - Ian Tant (06880b)	AVDC	Also comment on Qs 7-12	Noted
Barton Willmore - Ian Tant (06880b)	AVDC	06877b includes the Barton Willmore Technical Report from Barton Willmore - Gallagher Estates (06133b); 06877a is a covering letter	Noted
Barton Willmore (for Gallagher 06133c)	AVDC	06133c relates to a planning application	Noted
Bidwells - Careys New Homes	AVDC	Bidwell-Carey 06577 b is the council pro forma and refers to 06577 a; 06577 c is a site plan	Noted
Bidwells - Careys New Homes (06577a)	AVDC	Identical to Bidwells-Davidson for Qs 1 to 5	Noted
Bidwells - Davidsons Developments	AVDC	Bidwell-Davidsons 06577 a is the council pro forma and refers to 06577 b; 06577 c is a site plan; 06577 d is a letter from Natural England re: a planning application	Noted
Capita Property and Infrastructure (06934a)	AVDC	06934b is a covering letter with summary of main points	Noted
Carter Jonas and Januarys (06941b)	AVDC	06941a is the AV pro forma and refers to 06941b	Noted
Chiltern Conservation Board (06970b)	AVDC	Also comment on Qs: 7-13	Noted

Response from	To	Comment	Reply
Chiltern Conservation Board (06970b)	AVDC	06970a is a covering letter	Noted
Chilterns Conservation Board	CDC/SBDC	All other responses are as for the AV response: Chiltern Conservation Board (06970b)	Noted
Crest Nicholson - Shenley Park (06929b)	AVDC	06929a is the AV pro forma and refers to 06929b	Noted
DLA Barwood Simon Andrews (07053)	AVDC	Also comment on Qs: 7-11	Noted
DLP Planning - McCann Homes (07057b)	AVDC	Summary and conclusions - page 56 of report	Noted
DLP Planning - McCann Homes (07057b)	AVDC	07057b is the only version of the SPRU critique not marked as draft.	Noted
DLP Planning (07055 b)	AVDC	Responses above relate to 07055 b; 07055 c is the critique from DLP Strategic Planning and Research Unit (SPRU); 07055 a is the AV pro forma and refers to 07055 b and 07055 c. Responses below are the critique from SPRU in detail using the McCann Homes version - other submitted versions are draft.	Noted
DLP Planning (07055 b)	AVDC	Covered in DLP Planning - McCann Homes (07057b)	Noted
Gardner Planning - Arnold White Estates	AVDC	Notes above relate to: 06338d. 06338d&a&b are duplicates. 06338d is the latest of these documents. 06338c&e are both the council pro forma and refer to 06338d plus a site map	Noted
Gladman Developments (07075a)	AVDC	07075b is the AV pro forma and refers to 07075a	Noted
Heritage England	WDC	No comment, but draws attention to: "over 1,300 designated heritage assets in Wycombe, which should be recognised as a potential constraint (and, in some cases, an opportunity) for development"	Noted
Kemp and Kemp - Monor Oak Homes (06943a)	AVDC	Covered in Q1	Noted

Response from	To	Comment	Reply
Kemp and Kemp - Monor Oak Homes (06943a)	AVDC	Covered in Q1	Noted
Kemp and Kemp - Monor Oak Homes (06943a)	AVDC	06943b is site plans	Noted
Nathaniel Lichfield - CEG (06858)	AVDC	Also comment on Qs 4 & 6-11	Noted
Natural England	WDC	No comments on the HEDNA	Noted
Nexus Planning - CEG (06485a)	AVDC	Identical to Nexus-Inland and Nexus-Gleeson for Qs 1 to 6	Noted
Nexus Planning - Gleeson Homes (06485 b)	AVDC	Identical to Nexus-Inland for Qs 1 to 6	Noted
Oxfordshire County Council	WDC	No comments on the HEDNA	Noted
Runnymede BC	WDC	No comments on the HEDNA	Noted
Woods Hardwick	AVDC	00912a is covering letter, 00912c is a site map	Noted