



Draft Local Plan for **Buckinghamshire**

Appendix 1

Housing and Economic Land Availability Assessment Methodology

July 2026



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1. Introduction

- 1.1 The National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG) require local planning authorities to assess the amount of land that is available for housing and economic development in their areas. This is known as the Housing and Economic Land Availability Assessment (HELAA). The HELAA is a technical study that determines the suitability, availability and achievability of land for development. It is an important evidence source to inform plan-making but does not in itself represent policy nor does it determine whether a site should be allocated for future development or whether planning permission should be granted. Land allocations can only be made through Local Plans or Neighbourhood Plans.
- 1.2 A Local Plan is currently being prepared, which will cover the whole of the Buckinghamshire Council area, for the period up to 2045. This paper sets out a methodology for undertaking the Buckinghamshire HELAA.

2. Policy Context

National Planning Policy Framework

- 2.1. The National Planning Policy Framework, December 2024 (NPPF) sets out that “*The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.*”²
- 2.2. The NPPF requires “*Strategic policy-making authorities to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.*”³

Planning Practice Guidance

- 2.3. In March 2014, the Government published its Planning Practice Guidance which expands upon and provides practical guidance to support the NPPF. The PPG is regularly updated, with the latest guidance relevant to the HELAA being published in July 2019.
- 2.4. The HELAA guidance states that the purpose of the assessment is to identify a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment also helps with the identification of a five-year supply of housing land and help to inform as well as make use of sites in brownfield registers.⁴

² National Planning Policy Framework (December 2024) Paragraph 32

³ National Planning Policy Framework (December 2024) Paragraph 72

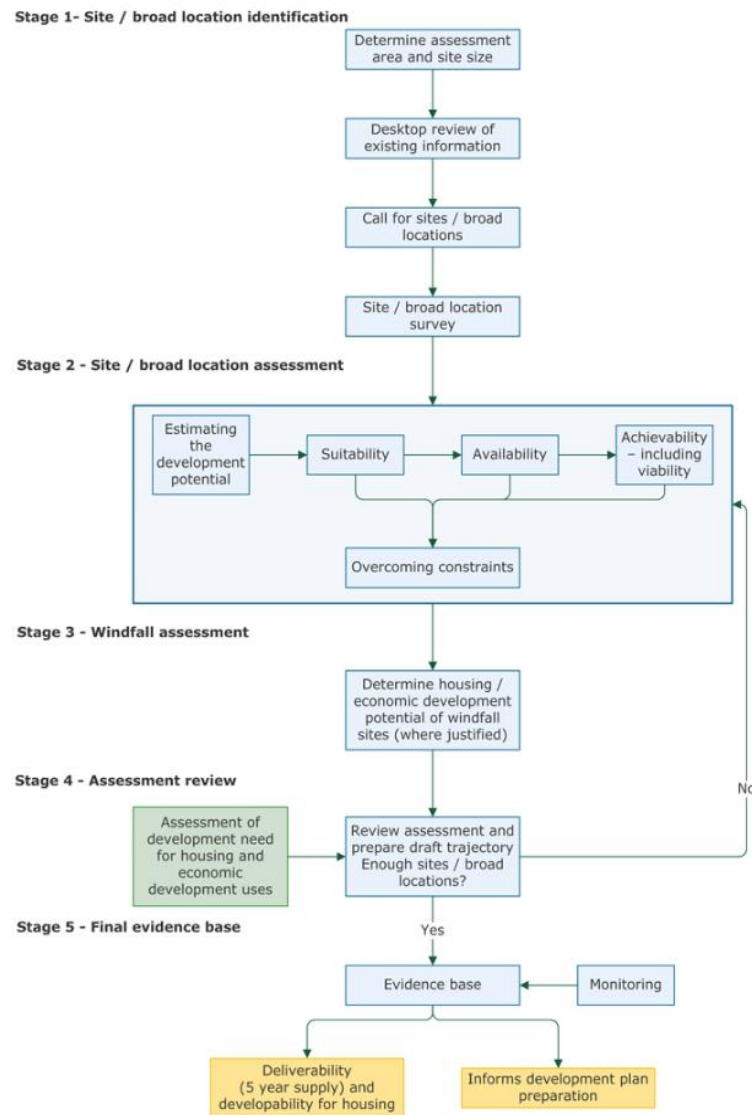
⁴ Planning Practice Guidance: Housing and Economic Land Availability Assessment Paragraph: 001 Reference ID: 3-001-20190722

3. Methodology

- 3.1. The PPG published in March 2014, and updated in July 2019, contains detailed guidance on an appropriate methodology for the assessment. This reaffirms the advantages of carrying out land assessments for housing and economic development as part of the same exercise and that such an assessment should:
- Identify sites and broad locations with potential for development;
 - Assess their development potential; and
 - Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 3.2. Figure 1 is the flow chart from the PPG which sets out a five-stage process for undertaking HELAAs.

Figure 1: National Planning Practice Guidance Housing and Economic Land Availability Assessment Methodology Flow Chart⁵

⁵ Planning Practice Guidance: Housing and Economic Land Availability Assessment Paragraph: 005 Reference ID: 3-005-20190722

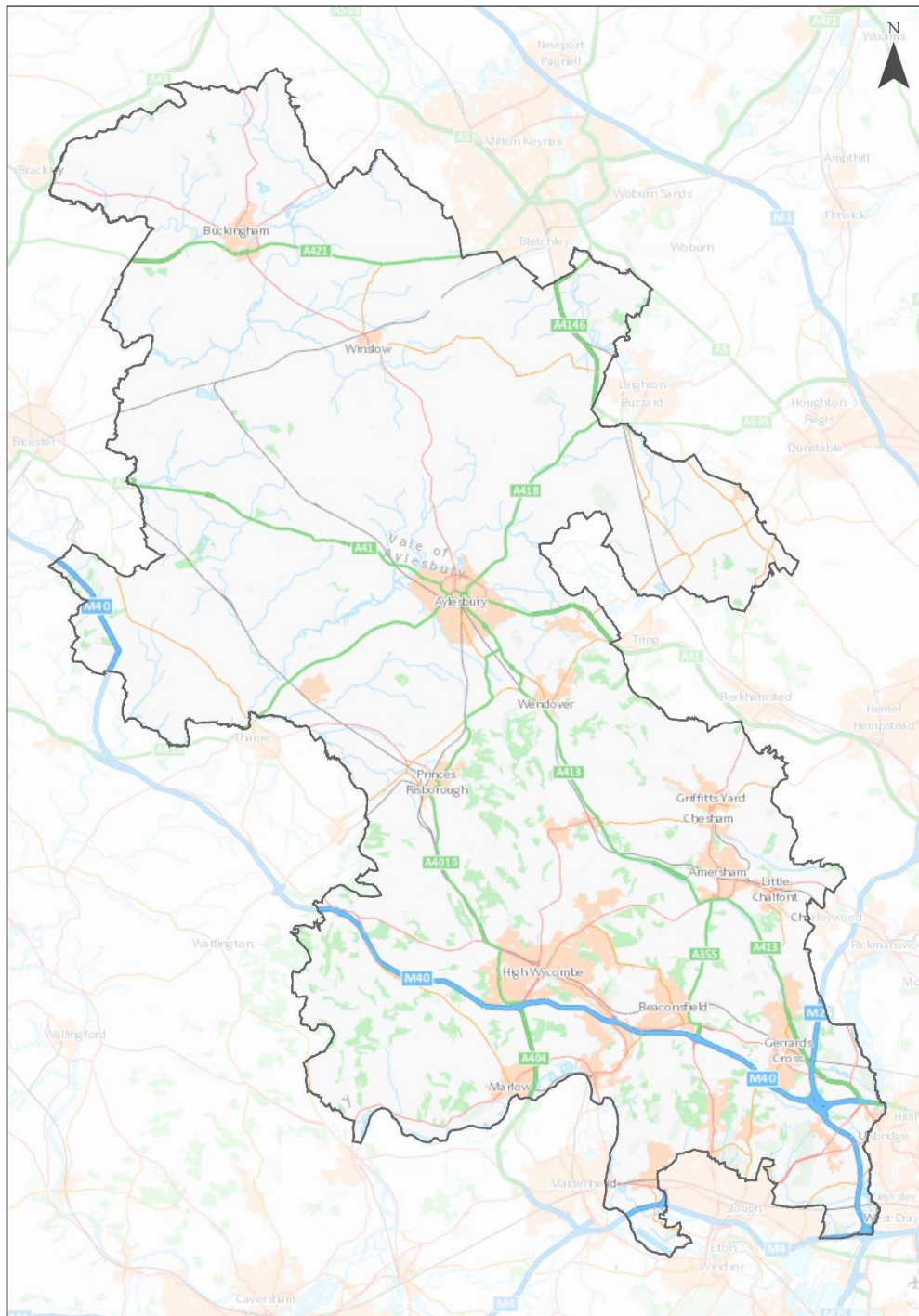


Stage 1: Identification of sites and broad locations

3.3. The PPG states that the geographical extent of site selection and assessment should be the plan-making area.⁶ The geographical area for the HELAA now covers the whole of the Buckinghamshire Council area (i.e. plan-making area). Figure 2 shows the geographical area for the Buckinghamshire HELAA.

Figure 2: Buckinghamshire Council Administrative Boundary

⁶ Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 006 Reference ID: 3-006-20190722



Land Uses

- 3.4. For the purpose of undertaking the Buckinghamshire HELAA, the methodology will focus on housing and economic land uses. This is in line with the PPG which provides guidance on assessing land availability for housing and economic uses. Housing will be defined as development falling within Residential dwellings (use class C3); and Residential institutions (use class C2). For economic development uses the HELAA will focus on use classes Eg(i), Eg(ii) and Eg(iii) of the Use Class E; and Industry and Warehousing (use classes B2 and B8). Additional types of uses will also be considered such as the travelling communities.

Size Thresholds

- 3.5. The PPG sets out that a HELAA should consider all sites capable of delivering 5 or more dwellings or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above.⁷ The methodology will adopt the size thresholds as set out in the PPG. Sites of less than 5 dwellings will be considered as being too small for allocation and could come forward through windfall.

Desktop identification of sites and broad locations

- 3.6. The PPG states that when carrying out desktop review, plan-makers need to be proactive in identifying as wide a range of sites and broad locations for development as possible. It is important that plan-makers do not simply rely on sites that they have been informed about but actively identify sites through the desktop review process that may assist in meeting the development needs of an area.⁸
- 3.7. Table 1 sets out the minimum data sources that Buckinghamshire Council will use for the desktop identification of sites and broad locations.

Table 1: Data sources for desktop identification of sites and broad locations

Data Sources	Explanation
Existing housing and economic development allocations not yet with planning permission	Local and neighbourhood plans Planning applications records
Planning Permissions for housing and economic development that are unimplemented or under construction	Planning application records Development starts and completions records
Planning applications that have been refused or withdrawn	Planning application records
Land in the local authority's ownership	Local authority records
Surplus and likely to become surplus public sector land	National register of public sector land Engagement with strategic plans of other public sector bodies such as central government, National Health Service, Ministry of Defence, police, fire services, utilities services, statutory undertakers
Sites with permission in principle, and identified brownfield land	Brownfield land registers (parts 1 and 2)
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, e.g. offices to residential)	Local authority empty property register Commercial property databases (e.g. estate agents and property agents) Brownfield land registers

⁷ Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 009 Reference ID: 3-009-20190722

⁸ Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 010 Reference ID: 3-010-20190722

Additional opportunities for unestablished uses (e.g. making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps Aerial photography Planning applications Site surveys Discussions with internal stakeholders
Business requirements and aspirations	Enquiries received by local planning authority Active engagement with sector
Sites in rural locations	Local and neighbourhood plans Planning applications Ordnance Survey maps Aerial photography Site surveys
Large scale redevelopment and redesign of existing residential or economic areas	
Sites in adjoining villages and rural exceptions sites	
Potential urban extensions and new free-standing settlements	
Planning Policy evidence base	Sites considered through previous HELAAs Sites identified as having development potential in Employment Land Reviews or other evidence base studies Call for Sites

Call for sites and broad locations

- 3.8. In addition to a desktop review, a call for sites and broad locations exercise can also enable people to promote sites for consideration and assessment. This may be undertaken for a fixed period of time or on an ongoing basis. In accordance with the PPG, the call for sites and broad locations will be aimed at as wide an audience as is practicable so that those not normally involved in property development have the opportunity to contribute.⁹
- 3.9. The call for sites and broad locations may identify land that was not identified through the desktop review. It may also provide more up-to-date or detailed information about land identified through the desktop review.
- 3.10. A call for brownfield sites was held between 16 February and 6 April 2021, which resulted in a total of 266 sites received, however not all of these sites were brownfield. A call for brownfield sites was launched on 6 December 2021 with a dedicated webpage being made available on the Council's website. The brownfield call for sites remained open for the public to submit sites. This was to ensure that all brownfield sites were considered first before exploring other sites. A wider call for sites was held from June to September 2022. The introduction of new national policy in December 2024 changed the way we calculate our housing needs for Buckinghamshire. The new housing need figure was a 43% increase from the previous standard method for calculating housing need. A fourth call for sites was therefore conducted between March 2025 to April 2025 to consider all available site options. In addition, a bespoke call for sites engagement exercise was undertaken to identify land for consideration for

⁹ Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 012 Reference ID: 3-012-20190722

the Gypsy and Traveller community. The engagement exercise took place between September and October 2025 and a total of 22 submissions were received.

- 3.11. An example of a call for sites and broad locations submission form can be seen at Appendix 1.

Sites and broad locations with overlapping boundaries

- 3.12. There is potential for duplication and overlapping boundaries when identifying sites and broad locations from the varying types of data sources. Where there is duplication of a site or broad location with identical boundaries, the site or broad location will only be assessed once within a HELAA.
- 3.13. Where site or broad location boundaries overlap, the first action will be to explore the reason for this overlap. This can be done by considering the source(s) of the sites/broad locations in the first instance. In the situation that a more recent submission or data source clearly supersedes an earlier submission or data source, the more recent boundary will be used. In the situation that two or more distinct sites or broad locations overlap, they may be assessed together as a whole, with commentary provided on the suitability, availability and achievability of individual parcels.

Initial site and broad location survey

- 3.14. The sites and broad locations identified through the desktop review and call for sites and broad locations will be added to the GIS mapping system and an initial survey will be undertaken.
- 3.15. The purpose of the initial survey is to establish up-to-date, high level information on each site and broad location in relation to its character and key constraints. This will help to understand the type and scale of development that may be appropriate and to gain a more detailed understanding of deliverability, including any barriers and how they could be overcome.¹⁰
- 3.16. Information on the sites and broad locations will be collected as part of the initial survey stage. Table 2 sets out the minimum information to be collected.

Table 2: Initial survey information to be collected

Type of Information	Explanation
Site size, boundaries and location	
Name	Site/broad location name
Size	Area size in hectares
Parish	Name of parish that the site/broad location falls within
Legacy Area	Legacy area that the site/broad location falls within
Current land use and character	

¹⁰ Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 013 Reference ID: 3-013-20190722

Land type	High level description based on the majority of the area (e.g. greenfield/brownfield)
Current land use	High level description of current land use(s)
Land uses and character of surrounding area	
Surrounding land uses and character	High level description of surrounding land uses and character (e.g. urban/rural character)
Physical constraints	
Access	High level description of any physical constraints in terms of vehicular, cycle or pedestrian access, location of access points and potential impacts on existing uses
Contamination	High level description of any known land contamination constraints
Flood risk	High level description based on the majority of the site/broad location. Use fluvial flood risk zones.
Infrastructure/utilities	High level description of any known physical constraints such as pylons, overhead power lines, substations, transmission pipelines and their safeguarded area, and water/wastewater infrastructure
Topography	High level description of any known constraints relating to elevations or slopes
Potential environmental constraints	
National Landscape	Note if the site/broad location is within a National Landscape.
Scheduled Ancient Monuments (SAM) and Ancient Woodlands	Note if there is a SAM or Ancient Woodland within or adjacent to the site/broad location.
Site of Special Scientific Interest (SSSI)	Note if there is a SSSI within or adjacent to the site/broad location.
Special Areas of Conservation (SAC)	Note if there is a SAC within or adjacent to the site/broad location.
Special Protection Area (SPA)	Note if there is a SPA within or adjacent to the site/broad location.
Consistency with development plan policies	
Allocation	Note if the site/broad location is subject to an allocation in an adopted local plan, minerals and waste plan or made neighbourhood plan.
Designated Local Green Space (LGS)	Note if there is a LGS within or adjacent to the site/broad location.
Green Belt	Note if the site/broad location is within Green Belt.
Proximity to services and infrastructure	

Access to services and facilities including public transport	High level description of access to services and facilities including public transport services.
Potential type of development	
Source of site	Note how the site/broad location was identified for inclusion in the HELAA.
Submitted/promoted use	Note submitted/proposed use as per call for sites and broad locations or planning application submissions.

Initial sift of sites and broad locations

- 3.17. The PPG states that there may be some sites and broad locations which, when taking into account national policy and designations, will not be appropriate to carry out more detailed assessments as it is clear that they will not be suitable for development.¹¹ Therefore significant constraints and criteria should be considered at this stage where they will affect the assessment of sites and broad locations. This is to ensure that the sites and broad locations are appropriately assessed before the detailed assessment stage.
- 3.18. Table 3 sets out the constraints and criteria used to exclude sites and broad locations from the detailed assessment stage.

Table 3: Constraints/criteria for excluding sites/broad locations

Constraints/Criteria	Explanation
Sites and broad locations for less than 5 dwellings or under 0.25 hectares (or 500 square metres of floor space) for economic development	Sites to be excluded as they do not meet the size threshold set out in the PPG. Sites of less than 5 dwellings may be included as part of the windfall assessment for housing.
Ongoing employment sites that are not recommended for release	Sites to be excluded if evidence recommend that it should remain in employment use for meeting identified need.
Planning status	Sites to be excluded if a permitted development covering the whole area has been completed, or if it has commenced and there is no further development potential.
Flood risk	Sites to be excluded for residential development if majority of the area falls within Flood Zone 3.
Site of Special Scientific Interest (SSSI)	Sites to be excluded if a SSSI covers the entire area. If the designation only covers part of the site, a judgement will be made based upon the sensitivities of the designation and likely impacts of development.

¹¹ Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 014 Reference ID: 3-014-20190722

Special Areas of Conservation (SAC)	Sites to be excluded if a SAC covers the entire area. If the designation only covers part of the site, a judgement will be made based upon the sensitivities of the designation and likely impacts of development.
Special Protection Area (SPA)	Sites to be excluded if a SPA covers the entire area. If the designation only covers part of the site, a judgement will be made based upon the sensitivities of the designation and likely impacts of development.
Scheduled Ancient Monuments (SAM) and Ancient Woodlands	Sites to be excluded if a SAM or Ancient Woodland covers the entire area. If the designation only covers part of the site, a judgement will be made based upon the sensitivities of the designation and likely impacts of development.
Designated Local Green Space (LGS)	Sites to be excluded if a LGS covers the entire area. If the designation only covers part of the site, a judgement will be made based upon the sensitivities of the designation and likely impacts of development.

Stage 2: Site and broad location assessment

Estimating development potential

- 3.19. The PPG states that the estimation of the development potential of a site or broad location can be guided by existing or emerging plan policy including locally determined policies on density. Plan makers should seek to make the most efficient use of land in line with policies set out in the NPPF.¹² This should also take into consideration of viability, given the quantum may affect viability and therefore, achievability and so inform developability within five years or beyond.
- 3.20. The development potential of the sites and broad locations will be assessed on a case-by-case basis. The housing potential is indicative only and does not prejudice assessments made through the Local Plan or planning application process. Given the diverse built character of places across Buckinghamshire, the housing densities will take into account the following factors:
- Adopted planning policy
 - Emerging planning policy
 - Existing/emerging evidence studies
 - Recent planning history
 - Constraints

¹² Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 016 Reference ID: 3-016-20190722

- Location and accessibility
- Surrounding character and density
- Infrastructure requirements

3.21. The developable area of the site/broad location will also need to be identified based on the constraints listed in Table 3. The developable area and the development potential at this stage remain indicative for the purposes of the HELAA. It will be for the Local Plan process to identify how relevant constraints could be addressed through appropriate mitigation, including the assessment of sites through the Sustainability Appraisal and allocation of sites in the Local Plan and other associated Development Plan Documents. It could also be tested thoroughly through the development management process.

3.22. For gypsy and traveller sites, the size and layout of existing traveller sites will be considered, as well as the most up to date information from consultants regarding size and design. In addition the council could consider the Government's Good Practice Guide: Designing Gypsy and Traveller Sites (May 2008) where information is unavailable. Although the Good Practice Guide is dated and has been withdrawn, it does include useful design principles which are still relevant.

Suitability

3.23. The PPG¹³ states that a site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. When considering constraints plan-makers may wish to consider the information collected as part of the initial site survey, as well as other relevant information such as:

- national policy;
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas;
- potential impacts including effect upon landscapes including landscape features, nature and heritage conservation.

3.24. Sites/broad locations already allocated in the development plan or with planning permission will generally be considered suitable for development and have therefore not been considered further in this assessment, which focuses on new sites/broad locations for future delivery. Some sites with planning permission may be reviewed if circumstances have changed which reflects the guidance in the PPG.

Availability

3.25. The PPG states that a site or broad location can be considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development.¹⁴ Extant

¹³ Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 018 Reference ID: 3-018-20190722

¹⁴ Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 019 Reference ID: 3-019-20190722

or expired planning permissions can also inform availability and will establish five year timeframes, or beyond, of developability.

Achievability

- 3.26. The PPG states that a site or broad location is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.¹⁵ Details of economic viability will be requested as part of the site submissions by the site promoters.
- 3.27. Sites and broad locations that are identified as not being suitable and available for development will not be considered achievable. Sites and broad locations that are identified as being suitable for development but not available may not be deliverable within the first five years but may be identified as being achievable later in the plan period.
- 3.28. The timescale for the development potential and rate of development could be identified when considering the size, scale and quantum of development, which in turn should take into consideration lead-in times and build-out rates. Information from the site submissions, developers and other third parties will help feed into timescales and development rates.

Stage 3: Windfall assessment

- 3.29. The term 'windfall sites' is defined in the NPPF as "*Sites not specifically identified in the development plan.*"¹⁶
- 3.30. The PPG outlines that a windfall allowance may be justified in the anticipated supply if a local planning authority has compelling evidence as set out in Paragraph 75 of the NPPF.

*"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area."*¹⁷

- 3.31. The windfall allowance is specific to each legacy area and the local evidence base for each will be used to inform this work and decide the extent to which windfall development should be considered in the HELAA process. The evidence will be considered collectively to identify a Buckinghamshire wide windfall allowance.
- 3.32. The HELAA does not include sites which are less than 5 dwellings (net), therefore a windfall allowance could be included for smaller developments falling below the

¹⁵ Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 020 Reference ID: 3-020-20190722

¹⁶ National Planning Policy Framework (December 2024) Glossary

¹⁷ National Planning Policy Framework (December 2024) Paragraph 75

defined HELAA threshold of 5 dwellings. The annual windfall allowance will be determined by applying a trend-based approach based on an analysis of completions over a period of 10 years, which reflects the potential effect of the pandemic.

Stage 4: Assessment review

- 3.33. Once sites and broad locations have been assessed, an indicative trajectory will be produced setting out how much housing and economic development can be provided across the plan area and at what point in the future it could be delivered.
- 3.34. The trajectory will outline the forecasted delivery of development in three timeframes as set out in the PPG¹⁸: 0-5 years, 6-10 years and 11 years and beyond.
- 3.35. If a shortfall in supply to meet the needs of the plan area is identified, the assessment will need to be revisited, for example to carry out a further call for sites or changing assumptions about the development potential of particular sites to ensure these make the most efficient use of land.¹⁹
- 3.36. If evidence shows that a shortfall in provision continues to exist the Council will consider continued cross-boundary provisions in accordance with the statutory Duty to Co-operate. This will enable the necessary Statements of Common Ground and other joint agreements to be formulated as Local Plan work progresses, helping to achieve a sound Local Plan.

Stage 5: Final evidence base

- 3.37. The HELAA will, as a minimum, include the following information in accordance with the PPG²⁰:
 - A list of all sites or broad locations considered, cross-referenced to their locations on maps;
 - An assessment of each site or broad location including:
 - Where these have been discounted, evidence justifying reasons given;
 - Where these are considered suitable, available and achievable, the potential type and quantity of development
 - An indicative trajectory of anticipated build out rates based on the evidence available.

4. Conclusion

- 4.1. Following the process set out above, the Council have undertaken an assessment of available land within Buckinghamshire which could be considered suitable and deliverable. In total 1,432 sites have been assessed through the HELAA. Over 100 of

¹⁸ Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 024 Reference ID: 3-024-20190722

¹⁹ Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 025 Reference ID: 3-025-20190722

²⁰ Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 026 Reference ID: 3-026-20190722

these sites that have been submitted to the council do not meet the 5-dwelling threshold. These are set out in appendix 2 and have not been assessed for suitability, availability or achievability and therefore not considered for allocation within the Local Plan.

- 4.2. The remaining sites have been assessed following the process set out above. The conclusion of these site assessments is set out in Appendix 3. In addition to appendix 3, there is also an interactive web based HELAA which can be found on Buckinghamshire Council's Website.
- 4.3. The HELAA has been used alongside a suite of relevant technical reports and analysis, to inform the development strategy for the plan area and subsequently, to inform the site selection process and formation of policy criteria. It will also be used to inform five-year housing land supplies and used as a starting point to identify available land for inclusion in Neighbourhood Plans and Brownfield Land Registers.