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**From:** Krzys Lipinski [REDACTED]  
**Sent:** 26 March 2019 10:13  
**To:** NewLocalPlan  
**Cc:** [REDACTED]  
**Subject:** Wycombe District Local Plan Proposed Main Modifications (Consultation - February - March 2019)  
**Attachments:** Representations on WDC Local Plan Proposed Modifications March 2019.pdf

I have attached a letter on behalf of Whiteacre Ltd in response to the Council's proposed main modifications to the Wycombe District Local Plan, specifically PMM 59

Regards

Krzys Lipinski BA (Hons) Dip TP MRTPI

KRL Planning Ltd  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



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26<sup>th</sup> March 2019

Planning Policy Team,  
Wycombe District Council,  
Council Offices,  
Queen Victoria Road,  
High Wycombe,  
Buckinghamshire,  
HP11 1BB

Dear Sirs

**Wycombe District Local Plan Proposed Main Modifications  
(Consultation - February - March 2019)**

I am writing on behalf of Whiteacre Ltd, in relation to PMM59, Policy 24 Affordable Housing.

PMM59 proposes a change in the way that the affordable housing provision is calculated. We welcome the change from calculating the affordable housing by way of the number of dwellings rather than by floor area, this brings Wycombe in line with most other Planning Authorities in the country.

However, we object to the proposed affordable housing requirement being set at 48% of dwellings on greenfield or land previously used as B category or sui generis uses, and 35% elsewhere.

A requirement for 48% affordable housing is excessive, in our view, and will have implications for land release. It is likely to create viability problems that could be insurmountable on many sites and will reduce the amount of new housing sites that can be developed.

Setting the threshold at such a high level will, in our view, seriously affect the viability of all potential housing sites to which it applies and is likely to reduce the supply of land coming forward. This will affect all sizes of sites, but especially small to medium sites which could potentially supply just over 5 units in areas which fall in the AONB or 10 units elsewhere.

Having an affordable housing requirement of 48% at 10 dwellings creates a 'dead zone' for sites capable of accommodating 10 -20 dwellings. There would be no incentive for developers to come forward with sites which potentially could accommodate 10 to 20 units. Market housing cross subsidises the provision of affordable housing therefore if a developer had a choice of acquiring a site which could yield for example 16 dwellings or a site that could yield up to 9 dwellings, they would invariably choose the 9 unit site, because the 16 unit site would only generate 8 market dwellings. Why would they choose a site which would only generate 8 market houses with the added costs of providing 8 affordable dwellings, when they could acquire a smaller site and build 9 market houses

With the rise of the big housebuilders over the past 20 years and the fall in the number of small to regional house builders, there has been a gradual fall in the number of small to medium sites coming forward. The council is reliant on smaller housebuilders to bring forward the small to medium sites.

The council is heavily reliant on the Princes Risborough Expansion and Aylesbury Vale DC to provide a significant proportion of its housing need during the plan period, but strategic sites such as Princes Risborough take a considerable length of time to start coming forward to provide the required housing. Small and medium sized sites can come forward far more quickly and need to come forward to meet housing needs whilst the strategic and larger sites get off the ground.

The plan confirms that some 40% of its anticipated housing supply would be expected to come from sites of between 10 and 100 units. Setting the affordable housing requirement level at 48% and 35% will discourage smaller housebuilders from bringing small and medium sites forward. It reduces the incentive for land owners to release sites, creating a reduction in the overall number of houses being built including affordable housing.

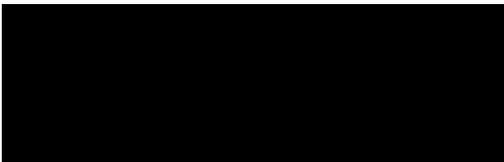
The council should also take due account of what neighbouring Authorities are proposing. If not, they will deter developments in their area, as developers will not face the same insurmountable viability challenges in adjacent areas, which are part of the same housing sub-market. This will further skew the market, and lead to a shortfall in the amount of new homes provided in the council's area, and a strong likelihood of consistent failure to meet its housing need.

Aylesbury Vale, in its submission version of its Local Plan is suggesting an affordable housing rate of 25% whilst RBWM in its submission version of the local plan is suggesting a rate of 30%. There should be a level of consistency and coordination between Local Authorities, especially with those that Wycombe DC has close links to, such as AVDC on whom WDC is heavily reliant to meet its overall housing need.

It is therefore suggested that the affordable housing requirement should be set at between 25% and 30% of dwellings in line with neighbouring Authorities. It would also then more accurately reflect the council's evidence base. The Housing and Economic Development Needs Assessment (HEDNA) identifies that for the plan period there is a need for 3,100 affordable homes or 23.5% of the full objectively assessed housing need.

Can you please notified of future stages of the Wycombe District Local Plan.

Yours sincerely



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Director

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