
From: Tony Hatton [REDACTED]
Sent: 27 March 2019 13:47
To: NewLocalPlan
Subject: Response to Proposed Main Modifications to the draft Local Plan

I comment on your PMMs 6 and 10.

PMM6.

In your follow-up questions to the Council in October 2018, you stated that “It would be of assistance if the Council could provide me with their views on whether the new {2016, published 2018} household projections represent a meaningful change in the housing situation in the District and if that would have any bearing on the soundness of the Plan”. The Council, in a six-page response, basically answered “no”. You recognized that response in PMM6, paras 4.36 and 4.40. I respectfully challenge, both the Council’s response to your question, and your subsequent PMM6.

(To avoid confusion, I will use “2014” to refer to projections based on the demographic projections calculated in 2014 but released in 2016. I will use “2016” to refer to those based on the 2016 projections developed by the Office for National Statistics (ONS) in 2016 and published in 2018.)

The 2016 ONS projections show a reduction in the growth of households in Wycombe for the period 2013 – 2033 from 10,990, in the 2014 analysis, to 6,350, in the 2016 analysis. (See Table 1 in the Council’s response to you). This is a reduction of 4,640 households.

The Council goes on to argue, correctly, that the ONS demographic projections are “only the starting point in the OAN calculation”, and that adjustments must be applied that would “close the gap” between the two different projections. However, the Council does not provide you with an updated OAN based on the 2016 data, showing the reduction in OAN.

In the absence of a calculation by the Council, I believe that another correspondent, Dr Atkinson, of Brands Hill Residents Association, has performed his own calculation, using the same methodology as that used to establish the OAN in the draft Local Plan. His calculation is an OAN for Wycombe, based on the 2016 ONS projections, of 8183 homes, compared to the figure of 12,824 derived from the 2014 projections. This is a reduction of 4,641 homes. Thus, the “gap” remains huge.

If Dr Atkinson's figures are not gainsayed by any fresh calculation from the Council, I must ask you to press the Council on this aspect of the plan. A reduction of anywhere near 1/3 in the projected need for new homes in Wycombe must have a significant impact on the need to develop certain sites, at all.

Dr Atkinson wrote in relation to two development sites, Terriers and Glynswood, the latter for 50 houses, suggesting that the latter should therefore be removed from the Local Plan.

I write in relation to the Bassetsbury Lane Conservation Area and submit that the same applies to the development of the former allotments on Bassetsbury Lane (HW13), with just 40 homes. This site, likewise, should be removed from the Local Plan as being patently unnecessary to meet the reduced housing need.

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PMM10

Like Dr Atkinson, I also have concerns that the enhanced policy to protect the Wycombe Historic Environment is not being carried through in practice.

In your modifications to CP11, you strengthen the requirement to protect the historic environment. “Conserving, and where possible enhancing, **the significance, special interest**, character and appearance of designated and non-designated heritage assets and historic landscapes; **and taking opportunities to reinforce the positive contribution to local character and distinctiveness by sustaining the historic environment.**” HW13, if allowed, would impinge strongly on the historic environment of the Conservation Area.

Sender: Mr T.A. Hatton [REDACTED]

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