

## Wycombe District Local Plan Examination

### Matter 3 - Housing Provision, Supply, Affordability and Gypsy and Traveller accommodation

#### Statement by Berkeley Strategic (June 2018)

- 3.1 This Statement is prepared by Berkeley Strategic ('Berkeley') in relation to Matter 3 of the Wycombe Local Plan examination.
- 3.2 Berkeley controls the Abbey Barn South and Wycombe Summit site (High Wycombe) which is an allocation within the Local Plan (Policy HW5). Berkeley also controls two sites at Chapman Lane, Bourne End and Heath End Farm, Flackwell Heath.
- 3.3 Berkeley's previous consultation response on the Proposed Submission version of the Local Plan (November 2017) raises concerns in relation to the Council's proposed strategy. These concerns are expressed below in response to the Inspector's questions.

#### ***Objectively-Assessed Need for Housing***

***1. Have the Housing and Economic Development Needs Assessments (HEDNA 2, HEDNA3, and HEDNA 5) been positively prepared and are their conclusions in respect of housing soundly based and justified?***

- 3.4 Berkeley does not have any comments on the HEDNA in respect of housing need but notes that under the Government's proposed new housing methodology the level of housing need in Wycombe is likely to need to increase in future. Whilst the standard methodology does not need to be taken into account in this Local Plan it is likely to be future planning issue for the District requiring additional development land to be identified. Any future review is likely to require the release of further Green Belt land.

***2. Is the objectively-assessed need for housing (OAN) of 13,200 additional dwellings over the plan period (660 dwellings per annum) based on robust and up-to-date evidence?***

- 3.5 As above.

***3. In order to meet the OAN for housing Policy CP4 (Delivering Homes) indicates that land will be allocated for 10,925 dwellings (550 per annum) to be constructed in Wycombe over the Plan period. How and where will the remaining 2,275 dwellings be delivered?***

3.6 The 2,275 dwellings are proposed to be delivered in Aylesbury Vale. However, Berkeley believes this number of homes will not be delivered in full leading to a housing shortfall over the Local Plan period. The new Aylesbury Vale Local Plan (known as the VALP) has been submitted for examination and hearings are due to take place during July 2018. The VALP makes provision for 2,250 dwellings (just short of 2,275) to meet Wycombe's unmet housing need as well as 5,750 dwellings to meet the unmet need of South Buckinghamshire and Chiltern. However, Berkeley has outstanding objections to the VALP which are, in summary, as follows:

- The level of housing to be delivered in Aylesbury Vale over the plan period is unachievable and relies on an annual average delivery rate of 1,405 dwellings, which is unprecedented in the district.
- The proposed VALP Spatial Strategy places 60% of its overall housing growth at Aylesbury; this concentration of planned housing growth in one location raises an issue of soundness because it is likely to lead to market saturation and consequent under delivery of housing over the plan period against the requirement.
- Aylesbury Vale District Council should accordingly review its commitment to deliver 2,250 homes to meet Wycombe's housing need, in view of there being additional sites that are suitable, available and achievable to meet housing need in Wycombe closer to where that housing need arises.

3.7 The disparity between the proposed annual rate of housing delivery proposed in Wycombe (550 homes per annum) versus that proposed in Aylesbury Vale (1,405 homes per annum) is significant. Notwithstanding the policy constraints in Wycombe (Green Belt / AONB), this disparity is representative of the imbalanced spatial strategy across the 'best fit' Housing Market Area (HMA).

3.8 To remedy these issues Wycombe District Council should review its housing land supply evidence and Green Belt assessment, which Berkeley in any case considers to be lacking as set out in the November 2017 consultation response and the accompanying Matter 6 statement, to identify additional land that can deliver its OAN in full. This would leave Aylesbury Vale with a more achievable, although still ambitious, housing requirement with less risk of a creating housing shortfall across the HMA.

**4. Will there be a 5 year supply of housing for the duration of the Plan period, how has this been calculated and is the delivery profile realistic?**

- 3.9 Berkeley notes that the Council states that it has a 5 year land supply. Berkeley's Abbey Barn South site forms part of the supply and Berkeley can confirm this site is deliverable within 5 years.
- 3.10 Notwithstanding this, Berkeley's sites at Bourne End and Flackwell Heath are also capable of being delivered within 5 years of Local Plan adoption. The sites could contribute not only to a more robust 5 year land supply but also provide greater flexibility for the Local Plan and address housing needs more fully within the district.

### ***Housing Supply***

#### ***5. Is the make-up of the housing supply justified and supported by robust evidence?***

- 3.11 Berkeley supports certain aspects of the Council's approach to housing land supply including the allocated sites such as Abbey Barn South. However, Berkeley has concerns which relate to soundness in relation to the Council's assessment of sites that have informed the supply.
- 3.12 Berkeley believes that there are flaws in the Council's site assessment methodology, particularly in terms of the way the Green Belt land has been assessed. These are explored further under Matter 6.
- 3.13 Berkeley is concerned that the site assessment methodology is insufficiently thorough, meaning it has failed to identify all of the suitable, available and achievable supply within the district, including Berkeley sites at Bourne End and Flackwell Heath.
- 3.14 For example, the Council's methodology has not thoroughly considered where there are opportunities to establish new defensible Green Belt boundaries as part of development and how a sensitive design approach could mitigate any concerns regarding the five purposes of the Green Belt. This is explored further in Berkeley's November 2017 consultation response and in relation to Matter 6.

#### ***6. Are the allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraints and demonstrated to be economically viable?***

- 3.15 Abbey Barn South has been assessed as a suitable location for growth at High Wycombe, the district's Tier 1 settlement and a planning application for development is pending determination.

- 3.16 However, as above Berkeley believes that there are some flaws in the Council's site assessment methodology, particularly in terms of the way the Green Belt land has been assessed.
- 3.17 Berkeley considers the Council should be requested to reconsider its assessment of supply accordingly and the reliance on delivering homes to meet Wycombe's needs in Aylesbury Vale should be reduced.

**7. Will the Plan be an effective mechanism for delivering the housing requirements contained in Policy CP4?**

- a) Are the site allocations available and deliverable within the anticipated timescales?**
- b) Should the Plan include a policy for the phased release of land for housing?**

- 3.18 Berkeley believes the Plan will be ineffective in delivering the district's housing requirements in full.
- 3.19 Whilst the inclusion of deliverable sites such as Berkeley's site at Abbey Barn South in the Local Plan will contribute to meeting a proportion of the district's housing need, Berkeley considers that the site allocations, in combination with the strategy of delivering homes in Aylesbury Vale district to meet Wycombe's housing need, will be insufficient to meet the district's housing need in full.
- 3.20 Berkeley considers that additional land should be identified to ensure the district housing needs will be met in full also providing greater flexibility for the Local Plan strategy to respond to changing circumstances.
- 3.21 Berkeley's submissions demonstrate that there are additional sites capable of delivering homes in the district sustainably.
- 3.22 Whilst Berkeley considers that the Council should allocate additional land in the district to ensure the OAN will be delivered, it may also be a sound approach to identify reserve sites capable of being released in due course if future monitoring indicates the housing target is not being met.

**8. Will Policy DM22 (Housing Mix) be an effective mechanism for delivering an appropriate mix of housing types, sizes and tenures?**

3.23 Berkeley has no comments on this question.

**9. Will Policy DM21 (Location of New housing) and Policy DM27 (Housing for Rural workers) provide an appropriate framework for managing the location of new housing development?**

3.24 Berkeley has no comments on this question.

**Other Housing Policies**

**10. Will Policy DM23 (other residential uses) provide an effective mechanism for assessing proposals for hotels and houses in multiple occupation?**

3.25 Berkeley has no comments on this question.

**11. Do Policies DM36 (Extensions and alterations to existing dwellings), DM37 (Internal space standards) and DM41 (Optional technical standards for building regulation approval) provide an appropriate mechanism for the design of new, extended and altered dwellings.**

3.26 Berkeley has no comments on this question.

**12. How will the need for specialist housing contained in Policy CP4 be met?**

**Affordable Housing**

3.27 Berkeley does not have any comments on this issue other than to say that Berkeley's developments would seek to provide affordable housing of varying tenure in accordance with the Council's policy requirements.

**Gypsies and Travellers**

3.28 Berkeley does not have any comments on this issue.