

Careys New Homes

Matter 3 Hearing Statement

Wycombe District Local Plan Examination

Matter 3 – Housing Provision, Supply, Affordability and Gypsy and Traveller Accommodation

Issue: Is the objectively-assessed need for housing soundly based, supported by robust and credible evidence and is it consistent with national policy? And will it be met during the Plan period?

Objectively-Assessed Need for Housing

Question 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?

OAHN and Housing Requirement

Under the NPPF, the Council should be proactively supporting sustainable development to deliver the homes needed by identifying and then meeting housing needs (paragraph 17) in particular the Council should be significantly boosting the supply of housing (paragraph 47). The Council is required to ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals (paragraph 158). The NPPG advises that housing need should be assessed in relation to the relevant functional area known as the HMA.

Policy CP4 sets out a housing target for the District of 10,925 dwellings over the plan period 2013–2033. The housing target is to be distributed across the District as broadly 6,350 homes for Tier 1 (High Wycombe), 3,200 dwellings for Tier 2 and 1,400 dwellings for Tiers 3–6 of the settlement hierarchy. The housing target is to be delivered through: existing completions and commitments; allocations in the Local Plan under Appendix D of the Local Plan, the Delivery and Site Allocations Plan and in the Local Plan Policies Map; allocations in Neighbourhood Plans; and through windfall development.

Paragraph 4.36 of the Local Plan states that the ‘*Buckinghamshire Housing and Economic Development Needs Assessment*’ (HEDNA) (December 2016 Report and September 2017 Addendum) indicates that the need for housing across the Buckinghamshire HMA is around 46,200 dwellings over the plan period. This includes a housing need for Wycombe District of 13,200 dwellings (660 dwellings per annum). AVDC have agreed to take the residual unmet need from Wycombe District.

Notwithstanding the above, paragraph 32 of the HEDNA, states that “*The proposed market signals uplift should increase the overall amount of housing available in the market area and therefore ease the housing market pressures that have been identified. Nevertheless, it is unlikely that house prices will adjust sufficiently to enable many of those households who are unable to afford their housing costs from moving away from the area. The Councils may therefore want to consider providing some of the additional housing proposed in response to market signals as intermediate affordable housing, including low cost home ownership products. This would accord with the objective set out at paragraph 50 of the NPPF to widen opportunities for home ownership and create sustainable, inclusive and mixed communities.*”

The HEDNA identifies the demographic starting point based on CLG’s household projections for Wycombe District to be 10,991 dwellings for 2013-33. Following adjustments, the HEDNA identifies a full objectively assessed need for housing

to be 12,824 dwellings. The overall housing need is set at 12,900 dwellings but then readjusted in the September 2017 Addendum to 13,200 dwellings.

Once the baseline demographic target is established, it is appropriate to consider how this might be adjusted to reflect market signals. The NPPG supports this approach by advising that *“The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other indicators of the balance between the demand for and supply of dwellings”* (Paragraph: 019, Ref ID: 2a-019-20140306) and that *“a worsening trend in any of these indicators will require upward adjustments to planned housing numbers compared to ones based solely on household projections”* (Paragraph: 020, Ref ID: 2a-020-20140306).

We consider that the Council have not taken the advice contained in the HEDNA (Paragraph 32) and adjusted the OAHN figure of 13,200 dwellings accordingly to reflect market signals. In turn, the identified housing target of 10,925 dwellings identified under Policy CP4 will also need to re-adjusted.

It should also be noted that Aylesbury Vale District Council published their Vale of Aylesbury Local Plan (VALP), Proposed Submission version for consultation in November 2017. The VALP states that at present, Aylesbury Vale District Council are estimating to accommodate a figure of 2,250 dwellings to meet unmet needs from Wycombe District. It is questionable whether this figure is sufficient to accommodate unmet need from Wycombe District and it is suggested that further evidence must be provided.

The HEDNA considers it unlikely that house prices will adjust sufficiently to enable many of the households who are unable to afford their housing costs from moving away from the area. It is therefore reasonable to suggest the Council should be considering additional housing in response to market signals and to widen the opportunities for home ownership. It is considered relevant to identify the potential for additional housing (for example, through Starter Homes) should the necessary provisions be in place.

The HEDNA identifies forecasted employment economic growth and land requirements for Wycombe District over the plan period 2013-33. It is considered that the Council should encourage greater employment growth for the District through increased delivery of housing growth. There should be recognition of the importance of housing development in relation to the creation of jobs in the construction industry and the wider economic benefits this brings.

Considerable information is provided within the HEDNA to consider the newly arising housing needs of Wycombe District. There is however little evidence to consider how the Council has performed against previous and existing housing targets, so as to ascertain whether there has been any historic shortfall in housing delivery (which may conceal housing need within the existing population).

It is also relevant to note that the Government’s ‘Planning for the right homes in the right place’ consultation (published 14th September 2017) identified an increased indicative assessment of housing need based on the proposed standard methodology from the current local assessment of housing need of 641 dwellings per annum to 792 dwellings per annum. This would equate to an increased requirement of an additional 151 dwellings per annum or a 23.56% increase. It is therefore likely that the Council will need to consider additional housing requirements over and above that already identified in the HEDNA.

In light of the comments provided above, the proposed housing target is not considered to be consistent with the requirements of the NPPF and is not justified by a robust evidence base. Furthermore, the identified target fails to plan positively for the full extent of housing need in Wycombe District over the plan period. Indeed, the current approach would artificially constrain growth and doing so exacerbate already acute housing availability and affordability issues. The housing target proposed in the Local Plan is therefore considered to be unsound.

On this basis, the Council should seek to accommodate further unmet housing need. In order to achieve this, additional sites must be identified for allocation in the Local Plan. In the event that Wycombe District is required to accommodate the further unmet need housing need from surrounding authorities, the housing targets identified in the Local Plan should be adjusted accordingly.

Land North of Hughenden Avenue, High Wycombe

My client wishes to promote their land interest at Land North of Hughenden Avenue, High Wycombe for residential development through a site allocation in the Local Plan. The site equates to an area of approximately 0.5 ha. It is considered the site can accommodate approximately 90 dwellings.

The Sketch Layouts accompanying our representation to the Regulation 19 consultation shows 2 no. options for the proposed layout of the proposed residential and associated development. Sketch Layout – 01, Option 1 shows proposed residential and associated development for 93 1-bedroom and 2-bedroom apartments, including 61 private units and 32 affordable units. Sketch Layout – 01, Option 2: Community Hall shows proposed residential and associated development for 90 1-bedroom and 2-bedroom apartments, including 61 private units and 29 affordable units, and a community hall on the ground floor.

The Design Concept accompanying our representation to the Regulation 19 consultation provides an illustrative sketch view of the proposed apartment scheme. The proposed development comprises 5–6 storeys in height, with the form of development addressing the street frontage in an ‘L’ shape. The proposed height of the apartment scheme comprises a mid-range between the 2 to 3-storey residential properties to the north and the 7-storey student apartment blocks to the south.

My client has progressed pre-application discussions with Wycombe District Council. There are no known constraints to the proposed residential development of the site. Safe access to the site can be achieved off Hughenden Avenue and the site is located in an accessible location close to a wide range of amenities and services. The above Sketch Layouts and Design Concept accompany this representation provide details of proposed layout and design to show how residential development of the site can be delivered.

The proposed development would be supported by a planning application accompanied by a detailed package of technical information which would demonstrate that the proposed development will not result in any significant harm to matters of acknowledged importance, such as highway safety, flooding, ecology, arboriculture, archaeology or landscape and visual amenity.

Proposed residential development of the site will contribute towards the housing needs of Wycombe District by providing a mix of market and affordable housing over the plan period and could contribute to a deliverable supply of housing.

In view of the above, the site represents an achievable, suitable and deliverable brownfield site to support the necessary housing growth for Wycombe District. The proposed development will contribute towards the Council’s housing requirements and expected further unmet need from adjacent authorities. Residential development of the site can be delivered and achieved within the forthcoming five-year period, which will contribute significantly towards the Council’s five-year supply and help towards the Council’s five-year supply and help towards addressing their current shortfall.

Summary

In summary, we consider that Policy CP4 is unsound as it shows that the Local Plan has not been positively prepared, is not consistent with national policy and is based on ineffective working on cross-boundary strategic priorities.

The NPPF requires Local Plans to meet objectively assessed needs under paragraph 14, with every effort should be made objectively to identify and then meet housing needs of an area under paragraph 17. To boost significantly the supply of housing, the NPPF requires local planning authorities to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area as identified under paragraph 47 of the NPPF.

Paragraph 156 of the NPPF requires local planning authorities to set out the strategic policies for the area in the Local Plan, including strategic policies to deliver the homes and jobs needed in the area. Furthermore, paragraph 157 of the NPPF requires, crucially, Local Plan to plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the Framework. In addition, paragraph 158 requires Local Plan’s to be based on adequate, up-to-date and relevant evidence and paragraph 159 requires local planning authorities to have a clear

understanding of housing needs in their area and should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs.

Paragraph 182 of the NPPF requires a Local Plan to be examined by an Inspector whose role it is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound”, namely: positively prepared; justified; effective; and consistent with national policy.

We consider that the Local Plan, specifically under Policy CP4, has not been positively prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities, in accordance with paragraphs 157 and 182 of the NPPF. The Local Plan does not meet the objectively assessed need for housing; we consider that every effort has not been made by the Council to objectively meet the housing need of the District and the Local Plan does not significantly boost the supply of housing based on an appropriate evidence base.

Paragraph 157 of the NPPF requires Local Plans to allocate sites to promote development, bringing forward new land where necessary, and provide detail on form, scale access and quantum where appropriate.

We consider that the Local Plan as drafted does not allocate sites sufficiently in locations such as High Wycombe and hence it does not comply with the NPPF. We therefore request the allocation for housing of my client’s site at High Wycombe.

Question 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?

An appeal decision made by the Secretary of State for Communities and Local Government (reference: APP/K0425/W/15/3135297) dated 14th September 2017 agreed with the Inspector that the Council is unable to demonstrate a robust five-year housing land supply and a position of 3.74 years was identified based on the FOAN as set out in the HEDNA (January 2016). The relevant housing supply policies in the development plan were considered out-of-date - the adopted Core Strategy requirements were based on the revoked South East Plan and was adopted prior to the publication of the NPPF.

It is clear that further site allocations are needed to demonstrate a robust five-year housing land supply. If the Council cannot demonstrate a robust five-year housing land supply on adoption of the Local Plan then the Plan cannot be found sound.

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