

Wycombe Deposit Local Plan Examination 2018

Further Written Statement – Jansons Property (Find Estates)

Background

1. GL Hearn (GLH), act on behalf of Jansons Property (Find Estates), freehold owners of the land adjacent to Terriers House at Amersham Road, High Wycombe (The Site). This document sets out Representations on the draft plan which were submitted to the Secretary of State for examination in public on 28th March 2018
2. Jansons fully support the plan led system and GL Hearn previously submitted representations on their behalf to the:
 - Wycombe District Local Plan Publication Version – Regulation 19 Consultation, October 2017
 - Wycombe District Local Plan Draft Consultation Document, June 2016
 - Wycombe District Local Plan consultation February 2014
3. GLH representations to the Terriers Farm – Draft Development Brief, made in November 2016, should also be considered. Copies of all these representations are attached to this document
4. We are aware that our client's site falls within "*Matter 7: Development Framework – High Wycombe.*" On these matters, we look forward to submitting further written representations before 17th August 2018.
5. This Further Written Statement addresses selected elements of the Inspector's Schedule of Matters, Issues and Questions set out in Matter 3. These additional comments build upon those submitted previously and are most relevant to our client's aim to achieve a full residential allocation of site HW7 which can be comprehensively delivered and which is justified, effective and consistent with national policy.

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

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?

Draft Policy HW7 allocates the site (in part) to deliver 500 new homes. Previous representations demonstrate why this allocation should be applied across the site and these remain valid..

Draft NPPF was issued for consultation on 10th May 2018. With consultation closed, Ministry of Housing Communities & Local Government has stated they “*aim to publish a final revised Framework in the summer.*” (2018). Therefore, prior to the adoption of the Local Plan, there are elements of the current draft, which if remain, will be applicable to not just our client’s site but others. It is to these elements that we wish to draw your attention.

Draft NPPF (Paragraph 69), recognises that small sites can make an important contribution to meeting the housing requirement of an area. Part d of this paragraph encourages local planning authorities to work with developers to sub-divide large sites where this could speed up delivery. Our most recent representations on the Site, prior to issue of the Draft NPPF, highlighted concern that a detailed masterplan on a site where in excess of 500 dwellings can be delivered has not been brought forward.

While the planning authority has, in the meantime, adopted a Supplementary Development Brief (SDB) for the site, we strongly believe this document does not provide the requisite detail hence requesting amendment of Policy HW7 to bring forward an Area Action Plan for the site. The AAP would, through effective masterplanning allow for the site’s subdivision and appropriate phasing. Furthermore, the SDB risks being not in full conformity with the Local Plan once it is formerly adopted, especially given that there remain outstanding material objections to the draft Local Plan policies that the SDB seeks to amplify, including HW7.

With the draft NPPF advising local planning authorities to work with developers to sub-divide large sites, we believe this adds significant weight to our previous representations which have called for a detailed masterplan to guide development on the site and our wish to work with the planning authority to achieve this.

Paragraph 24 of the draft NPPF expects the local planning authority to bring forward a minimum number of sites to meet strategic residential priorities unless other mechanisms such as brownfield registers can deliver this more appropriately.

Our previous representations for site HW7 have highlighted how the Council’s evidence base provides no qualitative or quantitative justification for the support for open space consummate with the site, with its protection afforded protection in situ or elsewhere within the proposed allocation regardless. We therefore are seeking removal of this requirement.

Removal of the requirement to protect, or re-provide, this quantum of open space will free up additional land to be brought forward for residential development in what is an accessible location on the edge of an established settlement. This decreases the requirement to source similar amounts of land from either less sustainable locations or through having to interrogate other mechanisms.

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Housing Supply

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?*

This draft policy requires sites identified as being able to deliver new residential development, such as HW7, to do so by 2033.

We can confirm that this site is indeed capable of achieving this timescale. However, we strongly believe that with a number of landowners across the proposed allocation, this ability would not only be strengthened but also quickened if a collaborative masterplan approach was taken (all landowners and the Council) resulting in an AAP (please refer to earlier responses made both on this and previous representations).

In terms of phasing, we believe that this approach would allow the Council and landowners to deliver a timely contribution to the dwelling supply for the benefit of all. From a planning perspective, our client's clear intent to assist in delivering dwellings at an earlier rather than later stage can be evidenced through engaging with the Council and the Highways Authority in obtaining formal pre-application advice. In addition, my client sought to be as inclusive as possible in this process by lifting their ability to have the outcome of this process not made available for 3rd party scrutiny.

