

Wycombe Local Plan – Written Statement

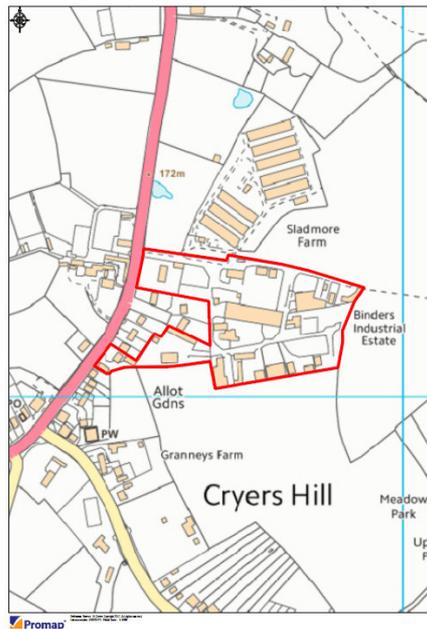
MATTER 3 – HOUSING PROVISION, SUPPLY, AFFORDABILITY AND GYPSY AND TRAVELLER ACCOMMODATION

Respondent ID: 944

This Written Statement is submitted to the Wycombe Local Plan Examination. It has been prepared by GL Hearn on behalf of W.G. Binder Ltd, in respect of the Binders industrial Estate ‘the site’.

Full site address is Binders Industrial Estate, Cryers Hill Road, Cryers Hill, High Wycombe, Bucks, HP15 6LJ. A redline plan is set out in Figure 1 below.

Figure 1. Binders Industrial Estate site location plan



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

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?

Our response

We have the following concerns with the HEDNA:

- Housing needs across the HMA have been reduced over the plan-making process, in particular at AVDC as the HEDNA questions census data / ONS 2014 based household projections. This is a concern especially in respect of AVDC accommodating unmet needs from adjacent LPAs including WDC.
- There is uncertainty with the baseline starting point for the OAN because the Council has applied its own assumptions, with regard to market signals, vacancies, second homes and suppressed household formation, and therefore adopted methodology is not fully in accordance with NPPG.

Our recommendation

We recommend that further housing allocations are required in the WDC Local Plan because the current reliance on AVDC to meet the unmet housing needs for adjacent LPAs is not based on sound evidence. The WDC Local Plan should seek a more proactive approach to accommodating its own development needs.

We recommend that the Council fully assesses the site at Binders Industrial Estate as a potential new housing site allocation.

Further details are provided in our Local Plan Reg 19 representations (from November 2017), which include our Call for Sites submission form and we strongly recommend that the Inspector reviews this document in conjunction with this Written Statement. This document sets out the following:

- The site represents sustainable development.
- The site is previously developed land and therefore should be the focus for new development. It is an industrial estate wherein the principle of development and activity is well established.
- The site is deliverable – it is available for development, development is achievable on the site and the site is suitable for development.
- The site makes a limited or no contribution to the Green Belt purposes and the site has a very low level of openness.
- Redevelopment of the site could lead to a range of benefits for the local community relating to large vehicle movements, the environment, air quality and noise.
- Redevelopment of the site could provide around 100 to 180 new homes, including affordable housing.
- Some employment uses on the site could be retained if required.

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?

Our response

We have the following concerns with the OAN for WDC:

- Slight adjustment downwards from the ONS 2014 based household projections. It is not clear why this has been applied.
- 20% uplift being proposed by the Council should be the minimum uplift because lower quartile income to house price affordability of Wycombe has worsened from 11.13 in 2016 to 12.03 in 2017 with lower quartile house prices increasing from £258,000 to £280,000.

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?

Our response

See our response to Matter 1. We accept the MoU between LPAs however we have concerns whether AVDC can accommodate the needs of surrounding LPAs including WDC.

We acknowledge that the approach taken by LPAs in the Housing Market Area 'HMA' is for the unmet needs of Wycombe District Council (WDC), South Buckinghamshire District Council (SBDC) and Chiltern Borough Council (CBC) to be accommodated in Aylesbury Vale District Council (AVDC).

Our concern is that the Strategic Housing Market Assessment 'SHMA' has underestimated the needs of AVDC, and therefore is AVDC able to accommodate all of the unmet needs (especially from WDC)?

In agreement with the HBF, we suggest that there is a need to increase delivery across the HMA in order to meet housing needs.

As a minimum, the Council must ensure that the unmet needs of WDC are met in full through additional allocations.

This approach still leaves unmet needs within CBC and SBDC, however both these LPAs are at early stages of new Local Plan preparation.

Our recommendation

We recommend that additional sites are allocated in the Local Plan and that the Council fully assesses the site at Binders Industrial Estate as a potential new housing site allocation. See above and our Local Plan Reg 19 representations for more details. We strongly recommend that the Inspector reviews this document in conjunction with this Written Statement.

Housing Supply

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

Our response

We consider that additional sites need to be allocated for housing development.

Our recommendation

We recommend that the Council fully assesses the site at Binders Industrial Estate as a potential new housing site allocation.

The site has a range of positive development credentials and would represent sustainable development. Most significantly it is previously developed land / brownfield land and therefore would make the best use of land. This is a clear objective of the Local Plan.

See above and our Local Plan Reg 19 representations for more details. We strongly recommend that the Inspector reviews this document in conjunction with this Written Statement.

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

Our response

We suggest that there is a balance between larger / strategic sites and smaller scale sites coming forward over the plan period. Delays to the delivery of strategic sites for any number of reasons could lead to the LPA not being able to meet its housing requirement.

Our recommendation

We recommend that the site at Binders Industrial Estate is fully assessed as a new housing site by the Council.

See above and our Local Plan Reg 19 representations for more details. We strongly recommend that the Inspector reviews this document in conjunction with this Written Statement.