

Wycombe District Local Plan Examination

Hearing Statement on behalf of ERLP 1 Sarl

Former Molins Factory, Saunderton

Representor Number: WDLP19-0875

**Matter 3: Housing Provision, Supply, Affordability
and Gypsy and Traveller Accommodation**

29 June 2018

LICHFIELDS

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1.0 Introduction

1.1 This Hearing Statement has been prepared on behalf of ERLP 1 Sarl in respect of their landholding at the site of the former Molins Factory, Saunderton. This site comprises Brownfield Previously Developed Land (PDL) within the Green Belt and Chiltern AONB and forms Policy 3 of the Bledlow cum Saunderton Neighbourhood Plan (BSNP) which supports the redevelopment of the site. Specifically, the BSNP states in the explanatory text that “*a mix of uses such as residential, retirement housing, small scale businesses and community facilities would be welcomed.*”

1.2 Our Hearing Statement for Matter 2, establishes that the assumption the emerging plan makes about the quantum of housing which can be delivered on the site is too low and as a result the current policy position is more likely to inhibit than facilitate delivery. Those points will not be repeated in this Hearing Statement, but they form important context for the issues addressed here.

2.0 Responses to Inspectors Questions

Q3 Where will the remaining 2,275 dwellings be delivered?

2.1 Aylesbury Vale District Council (AVDC) have agreed in the Duty to Cooperate Memorandum of Understanding (MoU) January 2018 with WDC that 2,275 dwellings of unmet housing need arising from Wycombe District will be accommodated in the Vale of Aylesbury Local Plan (Page 3). We have now assessed how they seek to accommodate this within the emerging Local Plan

2.2 AVDC formally submitted the new Vale of Aylesbury Local Plan (VALP) 2013 -2033 to the Secretary of State for independent examination on 28 February 2018, with Hearing Sessions scheduled to commence on Tuesday 10th July.

2.3 Within this Draft Policy S2 (Spatial strategy for growth) of the proposed submission draft VALP states that “*the Vale of Aylesbury Local Plan will make provision for the delivery of the following in the period to 2033:*

A total of 27,400 new homes in accordance with the spatial distribution set out below and in Table 1. This is made up of:

- *19,400 homes to meet the needs of Aylesbury Vale District*
- **2,250 homes to meet the needs of Wycombe District**
- *5,750 homes to meet the needs of Chiltern/South Bucks Districts” (Lichfields emphasis added).*

2.4 The 2,250 homes provided for WDC is less than the 2,275 dwellings requirement identified in the January 2018 MOU. It is not clear whether this is an error; if it is not, it is not clear how the small shortfall will be addressed. We are not aware that any arrangements are in place to do so.

Q5 Is the makeup of housing supply justified and supported by robust evidence?

1.1 Our clients concerns regarding the housing supply is threefold.

1.2 First, as noted in our response to Q3 the VALP falls slightly short of meeting the unmet need it has agreed to meet within the January 2018 MOU.

- 1.3 Secondly, as identified in our response to Matter 2 Q3 the provisions of the emerging VALP to meet WDC's unmet need do not result in a sustainable development. No specific provision is made in the emerging VALP to deliver the unmet need in appropriate locations within WDC which are accessible and in proximity to WDC.
- 1.4 Finally, as set out in our response to Matter 2 Q5a the evidence base in considering the former Molins site is inaccurate and flawed.
- 1.5 The Molins site has been considered an appropriate development site through the BSNP process – albeit the Neighbourhood Plan process is not able to release the site from the Green Belt.
- 1.6 Conversely the emerging WDLP is able to do so but the analysis of why it does not propose to is flawed.
- 1.7 The emerging WDLP land supply depends on the site delivering 20 dwellings. It is in fact capable of delivering more through an appropriate design response but the emerging WDLP has not appropriately considered the potential for this. It therefore constrains the overall development potential of the site – which is recognised through the BSNP and elements of the evidence base.
- 1.8 The resultant constraints that arise from the retention of the site in the Green Belt alongside the fact that the Neighbourhood Plan policy in effect adds little to national Green Belt policy reduce the prospects of housing delivery on a site which the emerging WDLP strategy depends.
- 1.9 In order to improve the prospects for the delivery of the redevelopment of the land (which is supported in principle by the Secretary of State, see the Hearing Statement for Matter 2), a more permissive policy context is necessary, indeed a more permissive approach had originally been proposed within the Neighbourhood Plan process.
- 1.10 Development beyond 20 residential units is likely to be required if the site is to be restored and reused. It will be apparent that if the policy context is overly restrictive, this will inhibit rather than facilitate development.
- 1.11 Any resultant failure to develop the site would therefore lead to a shortfall in housing yield and would not bring forward any of the benefits of development sought by the BSNP and recognised by the Secretary of State.