

# **Wycombe District Local Plan Examination**

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

### **Examination Statement by Nexus Planning on behalf of Inland Homes**

1. This Examination Statement has been prepared by Nexus Planning on behalf of Inland Homes in support of draft site allocation HW8.

## Housing Supply

### Question 5) Is the make up of the housing supply justified and supported by robust evidence?

1. In order to assess the deliverability of each site promoted through the Local Plan process, the Council carried out a Housing and Economic Land Availability Assessment ("HELAA") (September 2017) (document reference. HELS1).
2. The HELAA considers the deliverability of sites against the three criteria outlined at Footnote 11 of the NPPF and the NPPG (guidance note titled 'Housing and economic land availability assessment - paragraphs ref ID. 3-019-20140306; 3-020-20140306; and 3-021-20140306), and is therefore considered a robust methodology. NPPG Paragraph ID: 3-001-20140306 states that an assessment should:
  - Identify sites and broad locations with potential for development;
  - Assess their development potential; and
  - Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
3. Land off Amersham Road including Tralee Farm, Hazlemere is assessed within Appendix 4 of the HELAA - Site Assessment Proformas (housing, employment & mixed-use (document reference HELS1.4) as site reference SHZ0035. The assessment concludes that the site is suitable for residential development subject to its removal from the Green Belt.
4. Having identified a number of sites within the Green Belt as being deliverable within the HELAA (subject to their removal from the Green Belt) a Green Belt Assessment Part 2 (September 2017) (document ref. GB1) was undertaken by the Council to assess whether it would be suitable to release sites from the Green Belt, in accordance with the NPPF. The following steps were used for each site to carry out this assessment:
  - i. whether the location is capable of contributing to sustainable development;
  - ii. whether the site is capable of removal from the Green Belt;
  - iii. whether the site is otherwise developable; and
  - iv. consideration of Exceptional Circumstances.
5. Appendix GB1 (Individual Site Assessments) of the Green Belt Part 2 Assessment (September 2017) (document ref. GB1.1) demonstrates that the Council considered that the site scores poorly when assessed against the purposes of including land within the Green Belt, and that a new permanent

and robust Green Belt boundary can be formed through its development. The Council also concluded that the site is suitable for development and is deliverable. Accordingly, the site was considered suitable for release from the Green Belt, and was included as a draft allocation.

6. As demonstrated in our Regulation 19 Representation relating to draft allocation HW8, we strongly support the Council's conclusion that land off Amersham Road including Tralee Farm is deliverable in accordance with NPPF Footnote 11.
7. Since the Regulation 19 Representation, a public exhibition event was held on the 25<sup>th</sup> April 2018 to consult the local community on the emerging proposals for the site, and a screening opinion request was submitted to the Council on the 13<sup>th</sup> July 2018. The project team are now preparing a planning application for submission later this summer, in advance of the stage two examinations, to be determined upon adoption of the plan. Inland Homes intend to commence on site as soon as the pre-commencement conditions have been discharged. This clearly illustrates that the site is deliverable.

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

1. Please see our response to Question 5 of this Matter.

**Question 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?**

1. As detailed in our Regulation 19 Representations relating to draft allocation HW8, Inland Homes control the northern half of the draft allocation of land off Amersham Road including Tralee Farm (circa 106 dwellings), and are eager to deliver housing on the allocation at the earliest opportunity. As set out in our Regulation 19 Representations, no covenants exist on the land that would prevent the delivery of this land parcel. Given this, the northern half of the allocation is available in-line with the requirements of the NPPG (paragraph ref ID. 3-020-20140306). Moreover, there are no constraints that would prevent the delivery of the site, and it is therefore suitable in accordance with NPPF paragraph ref ID. 3019-20140306).
2. By virtue of the separate site accesses and the swathe of public open space indicated on the Concept Plan for the draft allocation, the parcel of land within Inland Homes' control can come forward separately to the remainder of the draft allocation.
3. The draft policy requires a comprehensive approach to the development of the allocation. Our Matter 7 Examination Statement will address this in greater detail, however Inland Homes have concerns that this would act as a barrier to the delivery of development, and would conflict with

the aims of the Government, as outlined at the Ministerial Foreword of the NPPF, and the 2017 Housing White Paper titled 'Fixing our broken housing market'.

4. The Housing and Economic Land Availability Assessment (September 2017) (document reference HELS1) identifies at Table 8 that the site will be delivered within 6-10 years. Inland Homes is seeking to deliver the land within its control (the northern half of the allocation) within 5 years, and, as detailed above, can deliver this separately to the southern half.
5. Inland Homes have already carried out pre-application discussions with Wycombe District Council (September 2017) with regard to the development of this site, and a public exhibition to inform local residents of the emerging proposals was carried out in April 2018. A planning application is being prepared to be submitted ahead of the Stage 2 examination hearing sessions.

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

1. As detailed in our Regulation 19 Representations relating to Policy DM22, Inland Homes support self-build housing. However, the 5% requirement on schemes of 100 dwellings or more is not justified, and the Council has not considered any alternative options of delivering self-build housing.
2. The NPPG suggests that relevant authorities could engage with landowners who own sites that are suitable for housing and encourage them to consider self-build and custom housebuilding (Paragraph: 02 Reference ID: 57-025-201760728).
3. Against the above background, Inland Homes recommend that a more flexible approach to self-building is applied within Policy DM22. This could include the removal of the requirement to meet a specific percentage within the policy wording and replacement with an encouragement to include self-build plots. Further, and only if evidence can be advanced to justify this, it is considered that supporting text to the policy could set out a percentage figure as guidance.

**Affordable Housing**

**Question 14) Are the affordable housing requirements identified in Policy DM24 (Affordable Housing) deliverable and justified by robust viability evidence?**

1. As outlined within our Regulation 19 Representations relating to draft Policy DM24, the Council's methodology for calculating affordable housing on the basis of gross internal area (GIA) rather than unit numbers is unjustified and inconsistent with national planning policy. This methodology of calculating affordable housing provision does not provide certainty regarding the delivery of objectively assessed affordable housing need. It also does not provide sufficient flexibility with respect to viability.
2. This is a concern raised within many of the Regulation 19 representations submitted relating to this policy, including the Home Builders Federation.

3. Accordingly, the policy should require the provision of affordable houses to be based on a proportion of the total number of units, as is standard practice.