

WYCOMBE DISTRICT LOCAL PLAN EXAMINATION

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

MR L NOE - ID REF. 0979

Additional statement responding to the Inspector's Schedule of Matters, Issues and Questions. These representations do not repeat matters set out in previous representations on behalf of Mr Noe, and do not seek to respond to every question raised in the Inspector's Schedule. The matters set out below focus on particular issues which the representor considers to be important in relation to assessing the soundness of the Plan.

Q1. 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?

1. The HEDNA is a joint document produced on behalf of Aylesbury Vale, Chiltern, South Bucks and Wycombe Councils for the period 2013-33. The work is based on demographic projections which have been tested against local market signals to ensure a robust and positive approach. Amended Figure 122 in HEDNA 2 summarises each of the stages of the assessment. This is a fully compliant assessment with both the NPPF and PPG guidance and also takes into account the PAS technical advice note on objectively assessed need and housing targets. The assessments have been positively prepared and their conclusions in respect of housing are soundly based and justified.

Q2. 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?

2. The evidence used to establish the OAN of 13,200 dwellings is based on the 2014 CLG household projections which were published in July 2016 and are the latest projections. These projections replaced those previously released in February 2015. The PPG advises that these figures should be the starting point for estimating overall housing need. The OAN is, therefore, based on robust and up to date evidence.

Q3. 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?

3. The unmet need of 2,275 dwellings will be met by Aylesbury Vale District Council within its Local Plan, as confirmed in a Duty to Cooperate Memorandum of Understanding (MOU11) dated

17th January 2018. The Examination of the Aylesbury Vale Local Plan is due to commence on the 10th July 2018.

Q5. Is the make-up of the housing supply justified and supported by robust evidence?

4. The make-up of the housing supply is drawn from a number of sources that includes previously developed sites in urban and rural areas, development of former reserve sites, the major expansion of Princes Risborough and through a review of green belt boundaries. The housing supply is justified and supported by robust evidence.

5. One of the allocations that forms part of the housing supply is Policy BE2 Hollands Farm, Bourne End and Wooburn (which will be the subject of detailed consideration later in the Examination). That allocation has been supported by detailed and robust technical evidence (please see the original representations on behalf of Mr Noe) which demonstrates that the allocation would be a sustainable location for residential development and is deliverable.

Q6. Are the allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraints and demonstrated to be economically viable?

6. The Council's Urban Design Assessment Development Capacity AONB and Green Belt Sites Report September 2017 (HELS4) sets out an assessment of the proposed allocations covering site constraints, any place-making features, dwelling numbers and density and indicative layouts. The report acknowledges that the work has been carried out in parallel with the landscape assessment work for the sites.

7. In relation to Policy BE2 – Hollands Farm, Bourne End and Wooburn the two main landowners/promoters of the allocation site have previously submitted separate and comprehensive representations containing detailed development information which demonstrates that the allocation site is free from development constraints, is economically viable and is, therefore, deliverable. The Council's own viability assessment (VIA1) which includes a detailed HCA Development Appraisal also independently confirms that the allocation site is viable.

Q7. 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?

8. The strategy of the Plan is sound and realistic and capable of delivering development (see representor's Matter 2 statement).

9. The Policy BE2 – Hollands Farm, Bourne End and Wooburn allocation is available, viable and deliverable (see paragraph 7 above). Both the key landowners/promoters are able to deliver the site

and it is available to support the strategic approach aims of the Plan. The Representor's technical appendix to the original representations focused on the deliverability of the smaller "Jacksons Field" part of the proposed BE2 allocation which demonstrated that this land is suitable, available, deliverable and achievable within the anticipated timescales. The representations on behalf of Catesby Estates Plc (ID Ref. 1168) provides the evidence in relation to the deliverability of the remainder of the BE2 allocation.

10. Given the scale of the need for housing there would seem to be no need for an overall prescriptive phasing policy, since delivery will be effectively controlled by the market. It is clear that the greenfield allocations in the Plan are fundamental to housing delivery and a phasing restriction could be counter-productive to the delivery of these important sites. Individual site allocation policies could make reference to the delivery of individual developments.

11. Therefore, the plan provides an effective mechanism for delivering the housing requirements contained in Policy CP4.

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Planning Works Ltd 29th June 2018.