

WYCOMBE DISTRICT COUNCIL LOCAL PLAN EXAMINATION

HEARING STATEMENT IN RELATION TO:

**'MATTER 3' – HOUSING PROVISION, SUPPLY, AFFORDIBILITY, AND GYPSY
AND TRAVELLER ACCOMODATION**

**Progress Planning on behalf of Mr L Mason (Land at Old Moor Lane,
Wooburn Moor)**

PREPARED BY
PROGRESS PLANNING
CHARTERED TOWN PLANNING PRACTICE

1 Introduction

- 1.1 Progress Planning act on behalf of the owner of land at Old Moor Lane, Wooburn Moor which has been promoted for development through the plan making process for 130 dwellings. This has included:
- Strategic Housing Land Availability Assessment (SHLAA) and call for sites submissions
 - Representations submitted on the Draft Wycombe District Local Plan in August 2016. This was supported by an indicative masterplan; a Transport Report; and a drainage and utility assessment.
 - Representations submitted on the Publication of the Wycombe District Local Plan in November 2017. These representations warned the Council of our view that the Plan was not legally compliant and unsound, because it was not positively prepared, not justified and not consistent with national policy.
- 1.2 This statement sets out the concerns with the Council's Strategy, specifically in relation to the approach to delivering housing in the District.

2. Question 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?

- 2.1 The Council's Housing Target and the evidence that underpins it will shortly be considered out of date. The Council's Housing Target is likely to increase to 792 following the publication of the standardized approach to assessing the OAN. The figure of 792 dwellings per annum is contained with the Housing Need Consultation Table (September 2017).
- 2.2 The Council's Local Plan, if adopted, is likely to be 'out of date' shortly after adoption and as such will require an early review. The Council should factor in this additional Housing Need to this Local Plan to 'future proof' the Plan. Given the Examination into the Plan is unlikely to close before the publication of the Standard Approach to OAN, it is recommended to factor additional supply into this proposal.

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

- 3.1 The Council is applauded for developing the New Local Plan in a time of uncertainty. However, it is considered that the Plan is not positively prepared, specifically concern is raised with the make-up of the Housing Supply on the following basis:
- Meeting the precise number of new homes over the plan period (10,925 – 10,927 are proposed) without a contingency.
 - The reliance of 'exporting' Housing Need to Ayelsbury Vale District Council.

- Disregarding available and deliverable housing sites within the Council's own boundaries. (See Matter 6 statement for further detail).
- 3.2 It is considered that there is considerable risk in Planning for the 'exact' housing target (the portion to be delivered within Wycombe District Council) derived by the Objective Assessment of Housing Need. The Council is Planning for 10,925 new homes over the Plan Period. This process does not allow for unforeseen delays in the delivery of allocated sites, or indeed the delivery of sites at a lower density than expected. The problem is exacerbated by the reliance of windfall sites (559 dwellings) and allocations in as yet unmade Neighbourhood Plans (425 dwellings) in meeting the Housing Target.
 - 3.3 The plan does not allow for sufficient flexibility to mitigate against the potential for slow / under delivery of housing. As such the draft Plan **cannot** be considered as positively prepared and in its current form, is **not sound**.
 - 3.4 The Council are proposing to 'export' some of their OAN to Aylesbury Vale District Council, with the need for 2,250 new dwellings being 'supplied' in the Vale. Whilst it is commendable to see authorities working together under the Duty to Cooperate, it is regrettable that the Council have not left 'all stones unturned' in pursuit of accommodating local housing need within the District.
 - 3.5 The Council's reliance on Aylesbury Vale District Council to accommodate their un-met need is questionable. The Bucks authorities have considered that a Housing Market Area covering the whole of Bucks (excluding Milton Keynes) is the best fit for the LPA's. In practice, it is considered that Aylesbury Vale is unlikely to adequately meet the needs of the residents of falling within the Wycombe administrative boundary.
 - 3.6 This strategy is also reliant on the Vale of Aylesbury Local Plan, which is currently being examined, being found sound and adopted. The Council have taken a significant risk in relying on a yet unmade Local Plan. As such it cannot be considered Justified or Positively Prepared and is not sound.
 - 3.7 Aylesbury Vale District have not identified where or when the un-met need arising from Wycombe will be met. Again this leads to the conclusion that there is considerable risk associated with the Council's strategy in attending to the Housing Needs of the District.
 - 3.8 The Council have not explored all opportunities to meet their own housing need within the District boundaries. Specifically, the site at Old Moor Lane (Wooburn) has the capacity to deliver 130 dwellings. The merits of the site and the approach to Green Belt release are explored in further detail in the Matter 6 Hearing Statement.

3.9 In order to overcome these issues with Soundness it is strongly recommended that Main Modifications are proposed that:

- Allocate sufficient land to provide a further 550 dwellings across the Plan Period, which is recognized as a suitable buffer to ensure the strategic objectives of the Plan are met.
- Allocate Land at Old Moor Close, Wooburn for 130 dwellings
- Review / allocate further sites to reduce the reliance on delivery within Aylesbury Vale District Council.

If the above is not carried out it is recommended that the Plan is withdrawn from the examination by the Council (and return to Reg 18 stage consultation on the Local Plan) and found unsound by the Inspector.

4. *Question 7 – Is the make-up of the housing supply justified and supported by robust evidence?*

4.1 The Council's Housing Supply, is not justified. It is suggested that 425 dwellings will be brought forward through allocations in as yet un-made Neighbourhood Plans. There is concern that the delivery of such Neighbourhood Plans (NP's) sit outside of the Council's control. Whilst the Council's emerging Local Plan sets the framework for NP allocations to come forward, there is little certainty that NP's will come forward with sufficient allocated land to meet the strategic objectives of the supply.

4.2 It is also unclear if the 300 dwellings at Longwick, of which most benefit from Planning Permission, have been factored into sites with Planning Permission. It appears as though the Council have 'double counted' the Longwick commitments in both Sites with Outstanding Planning Permission / Under Construction and the allocation for 300 dwellings to come forward in the Neighbourhood Plan.

4.3 The Council therefore need to allocate further land to make up this shortfall of 300 dwellings. As it stands the Housing Supply is not justified and therefore the Plan is not sound.

4.4 The site at Old Moor Lane, Wooburn, should be allocated to assist with making up this shortfall. This is recommended to be included in the Plan as a main modification.

4.5 The Council should also consider allocating sites within Neighbourhood Plan areas to provide some certainty as to their delivery over the Plan Period.

B) Should the Plan include a policy for the phased release of land for housing?

4.6 The Council should include additional land (over that already proposed for allocation) that can be brought forward should the Council's Housing Land Supply fall below five years. The Council expect a disproportionate amount of dwellings to be delivered between 2018 and 2023 (877 per annum). It is considered a phasing strategy would also assist in balancing the delivery of housing across the plan period.

5. Question 6 - Are the Allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraint and demonstrated to be economically viable?

5.1 Allocation BE1 - Slate Meadow, is significantly constrained by both flooding and ecology constraints, notwithstanding the Green Belt consideration forwarded in the Matter 6 Statement. Some 70% of the site is within Flood Zone 2. The site is also bounded by the River Wye. It is considered that the site is also of ecological merit. It is therefore questioned as to how the site can accommodate 150 dwellings.

5.2 The Council have not demonstrated through the emerging Local Plan how these constraints will be addressed / mitigated. The indicative 'build' plan denotes a significant portion of development within Flood Zone 2. It is therefore considered that the Slate Meadow site is significantly constrained and not deliverable.

6. Question 9 - Will Policy DM21 (Location of New Housing) and Policy DM27 (Housing for Rural Workers) provide an appropriate framework for managing the location of new housing development?

6.1 The Council have not allocated any housing to Wooburn Green, which is recognized as a Tier 2 settlement. Wooburn Green is considered to be a more sustainable settlement than the neighbouring Bourne End. Wooburn has closer links to the strategic road network with access to the M40 provided at both Loudwater and Beaconsfield. Beaconsfield Rail Station is also in close proximity to the Wooburn, being some 2.8km from the proposed site at Old Moor Lane.

6.2 In the interests of Soundness, it is considered that the Council should seek to allocate land within Wooburn to assist with meeting the strategic objectives of the Plan.

7. Conclusions

- 7.1 Progress Planning have significant concerns with the Soundness of the Plan as submitted. The make of the Housing Supply is marred by:
- Reliance on AVDC to deliver a significant portion of Housing Need.
 - No flexibility in housing allocations to account for poor performance in delivery
 - Reliance on as yet unmade Neighbourhood Plans
 - Lack of supply in Wooburn
 - Allocation of an undeliverable site (BE1- Slate Meadow)
 - Double counting of sites with Planning Permission in Longwick
- 7.2 It is considered that the following Main Modifications will assist, in part, in addressing the current failings of the Plan:
- Allocating sites to provide a further 550 dwellings to act as a contingency to poor performance
 - Allocation of the Old Moor Lane Site for 130 dwellings
 - Review of all sites to reduce reliance of on Aylesbury Vale to address housing need arising in Wycombe District Council
 - Removal of the Slate Meadow site (BE1)
 - Removal of the 300 dwellings with consent in Longwick from the Supply (the 450 dwellings suggested to come forward in Neighbourhood Plans)
 - Allocation of further sites to make up the shortfall.