



## **Matter 3 – Housing Provision, Supply, Affordability and Gypsy Traveller accommodation** **[Representor ID Reference: 600]**

**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**

**Q.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?:**

- 3.1 If there is any failure to accommodate the 2,275 dwellings, an early review of the Local Plan will be required (and one will almost certainly be required in any event under the new NPPF when it is in force).
- 3.2 That requirement carries with it an additional advantage, however. In particular, RARA seeks to modify the Local Plan by reducing the scale of expansion of Princes Risborough to up to 1,000 homes, a more sustainable level, as detailed in its original representation and commented upon further under Matter 2. This would create a shortfall of up to 1,600 Hence, an early review of the Local Plan would be essential to consider whether WDC is able to accommodate these homes in more sustainable locations across the District (see response to Matter 2).
- 3.3 There is no downside to such a review, only an upside:
  - (1) Given the proposed Plan-period, there is plenty of time for the review to take place without causing adverse impact to the delivery of housing.
  - (2) An early review will be able to consider more sustainable solutions than currently proposed, with a wider distribution of housing across the District to locations with better economic and transport links, and afford time:
    - a. For a more purposeful and rigorous District-wide Green Belt assessment to identify sites that perform relatively poorly in Green Belt terms but are in sustainable locations, closer to employment centres;
    - b. To assess the effects of the Unitary Authority proposal for Buckinghamshire;
    - c. To look more strategically at better road solutions with the proposed East - West corridor opening up new opportunities and;
    - d. To seek to maximise the identification and utilisation of Brownfield sites.

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

- 5.1 WDC's register of Brownfield sites in High Wycombe identifies sites with a potential of around 2,800 new homes. However, this excludes any further homes being created in the redevelopment of High Wycombe station. When unable to meet its full OAN, can it be justified for WDC to include only 600 new homes as coming from this source?
- 5.2 Contrary to the governments recommended aim of a density of 30 dwellings per hectare, of the sites identified in the Wycombe urban conurbation, there are a number of sites with a lower proposed net density. The developers of the reserve sites have stated in their representations that they feel the proposed density for such sites is too low, supporting the view made by G L Hearn in their 2016 report. As they are within the urban area of Wycombe, the more efficient use of these sites is to be encouraged (especially since the District is constrained by both Green Belt and the AONB), as set out in the current NPPF and even more greatly emphasised in the draft NPPF.
- 5.3 In a District with a major unmet need these allocations appear to have indefensibly low densities and should be better used to help sustainably accommodate the shortfall in OAN occasioned by the reduction in the scale proposed for, and which would swamp, Princes Risborough.

**Housing Supply**

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

- 6.1 The Viability Report commissioned by Bucks County Council stated that the target of so many houses in Princes Risborough was unrealistic and 800 would have to be delivered after 2033.
- 6.2 Moreover, even this estimation relies on an optimistic start date of 2022, one which depends on a number of events to be achieved within that timetable (e.g. proposed road and rail intersections) which the Report was also concerned about, so further slippage should be expected. This is a point supported in the submissions made by two developers.
- 6.3 It is not insignificant that a preselected developer (Bloor) has already consulted on proposals for a site in the proposed expansion site that does not ally with WDC's plan vision and that attempts to free them from the responsibility to contribute to a relief road.

**Q.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?**

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

- 7.1 Removing the requirement of the unpopular, sub-optimal relief road proposal for Princes Risborough by limiting the expansion to circa 1000 homes, would significantly improve deliverability and with a 2 year review, better solutions to road options and wider connectivity opportunities can be explored. (Please see: RARA's "Representation on the

Publication Version of the Wycombe District Local Plan” at 4.3, where the deliverability obstacles, and controversy of the proposed relief road, are highlighted along with wider road issues).

- 7.2 It must also be noted that Aylesbury Vale District, even as one of the top Districts for building new homes, is struggling to meet their own targets. Having to accept further unmet need will not help.
- 7.3 Sites included in the Plan that are “under construction and with planning permission” include a number of sites which were advertising houses available back in 2013. RARA questions whether these should have been included and whether this is consistent across all expansion sites.
- 7.4 Of the number of houses due to be built in the two years up to March 2018, only half had been built by September 2017 - suggesting that the Local Plan is already playing catch up before it has been adopted. Most of the houses in the Plan for Risborough would not be able to start being built until 2022 (see response to Housing Supply above), which questions the deliverability of the Plan within the Plans period and, again, should trigger an early review.

#### **Affordable Housing**

**Q.14) Are the affordable housing requirements identified in Policy DM24 (Affordable Housing) deliverable and justified by robust viability evidence? And how will the affordable housing need of 3,100 dwellings be met?**

- 14.1 Affordable housing allocation suffers from the same problem that the overall Plan suffers from; it is not the right homes in the right places. The supply of affordable homes should match where the needs are. The proportion of affordable housing on sites should reflect the need of its surrounding areas. If not, then a massive investment in the social support network would be required to meet this social redistribution in the areas highlighted for major development and this is not shown in the Local Plan. Similarly, areas that have very low proposed growth will not meet the social and affordable housing needs of these settlements and lead to skewed demographics across the District.
- 14.2 There are no recommendations for self-build sites within the Plan. Self-build sites are an increasingly popular and effective means of delivering affordable housing.