

Wycombe District Local Plan

Examination Statement

Matter 3 – Housing Provision, Supply, Affordability, and Gypsy and Traveller Accommodation

Statement Prepared by:

Savills (UK) Ltd

For:

Bloor Homes Limited

Introduction

1.1 Savills is the agent for Bloor Homes Limited in relation to its land interest at Longwick Road and Mill Lane, within the proposed Princes Risborough Expansion Area (PREA). This statement addresses specific questions in response to Matter 3 set out in the Matters, Issues and Questions identified by the Inspector, dated May 2018.

1.2 Matter 3 - the main topic identified by the Inspector for this session is:

“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?”

Using the same numbering as in the ‘Schedule of Matters, Issues and Questions’ document we set out below a response to the questions that are relevant to our case. Representations, dated 27 November 2017, were duly submitted to the Regulation 19 Publication Version Wycombe District Local Plan (WDLP). This statement should be read in the context of those representations. The comments set out below are in addition to those in the earlier representations.

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?

1.3 The NPPF requires Local Plans to be ‘aspirational but realistic’ (para 154). Paragraph 159 requires the preparation of a Strategic Housing Land Availability Assessment to establish realistic assumptions concerning availability, suitability and likely economic viability.

1.4 The HELAA (HELS1) sets out WDC’s methodology and site assessment work in respect of potential housing delivery across the District. WDC Topic Paper 2 – Housing includes the approach to assessment of Green Belt and AONB site release. Key constraints and potential capacity have therefore been assessed.

1.5 Bloor Homes identified key topic areas associated with viability work through its Regulation 19 representations. Since that time, WDC has secured government funding relating specifically to enabling delivery at Princes Risborough, to the sum of £12 million. We understand that WDC is currently preparing an Infrastructure Delivery / Capacity Plan, in relation to proposed expansion at Princes Risborough which will further inform specific delivery and viability matters. This document is reported for publication in Summer 2018 and we anticipate will further inform the basis of discussion concerning delivery and viability of the specific PREA allocation at Matter 8 (Question 1).

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?

- 1.6 The Plan demonstrates proposed delivery against the housing target for the District. Dwellings will be delivered through a range of sources including previous completions, extant planning permissions, strategic, smaller and Neighbourhood Plan allocations and windfalls. A mix of brownfield and greenfield sites is identified.
- 1.7 It is considered that the Plan's policies for the supply of housing are generally effective and will result in timely delivery over the Plan period.
- 1.8 Policy CP4 identifies a broad distribution of development across the District. Bullet 2b i) relates to provision at Princes Risborough. The WDLP does not clarify at CP4 or Tables 15 and 16 of the WDLP where the 1,662 dwellings (scheduled in the Plan period to 2033 and within the PREA) are to be delivered. Based on the delivery scenario analysis set out by WDC Topic Paper 2 and the HELAA (HELS1), no phasing proposal is evident. As per 1.5 above, we anticipate the Infrastructure Delivery / Capacity Plan will enable further discussion of the specific PREA allocation at Matter 8 (Question 1). This will include for specific timescale delivery.

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

- 1.9 No, this is not considered necessary in respect of plan delivery since it would result in too prescriptive an approach. On a general level this would potentially limit the flexibility of the final Plan in providing for housing delivery, contrary to NPPF Paragraph 14. Such an approach could also limit WDC's ability to provide for a 5 year supply of housing land.

Question 11 – Do Policies DM36 (Extensions and alterations to existing dwellings), DM37 (Internal space standards) and DM41 (Optional technical standards for building regulation approval) provide an appropriate mechanism for the design of new, extended and altered dwellings?

- 1.10 It is noted that internal space standards are covered by Policy DM40 of the WDLP (not DM37 as referred by the question above). Regulation 19 representations highlighted the overly prescriptive nature of the policy, lack of flexibility in approach and lack of justification provided by WDC. In turn this policy could impact upon affordability of housing, owing to larger unit delivery, and potential unit yield per site.

1.11 Paragraph 1.55 of the Housing White Paper (Fixing Our Broken Housing Market, February 2017) makes clear the Government's concern as to a 'one size fits all' approach. The objection to Policy DM40 is maintained and its deletion is sought.

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

1.12 We maintain objection on respect of the self-build requirement (bullet 2) of this policy for reasons previously set out i.e. lack of evidence to justify the policy requirement, aspirations of potential occupiers of such units and lack of release mechanism for plots which are not taken up.

Question 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?

1.13 We maintain objection to Policy DM24 on the basis that it does not account for an assessment of viability. This is contrary to the principle of Paragraph 14 of the NPPF which requires flexibility in plan-making.