

Matter 3
Representor reference: 1129



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**Wycombe District Local Plan
Matter 3 – Housing Provision, Supply, Affordability and Gypsy and Traveller
Accommodation**

**By Strutt & Parker
On behalf of IM Land
Land at Berwick Road, Marlow**

Introduction

1. This hearing statement has been prepared by Strutt & Parker on behalf of IM Land, who have residential development interests in two sites on the edge of Marlow: Land at Seymour Court Road and Land at Berwick Road. This statement relates to Land at Berwick Road.
2. The site was promoted to the Council in response to consultation on the draft Local Plan, and is capable of accommodating 30-40 dwellings on part of the site in a sustainable location on the edge of the built up area of Marlow.
3. This statement responds to the Inspector's Matter 3: Housing, due to be discussed at the hearing sessions on 19th July 2018.

Housing Supply

Is the objectively assessed need for housing soundly based, supported by robust and credible evidence and is consistent with national policy? And will it be met during the Plan period?

Objectively Assessed need for housing

1. Have the Housing and Economic Development Needs Assessments been positively prepared and are their conclusions in respect of housing soundly based and justified?

1. Turley carried out a study on behalf of IM Land titled '*Housing Needs in Wycombe – Review and Critique of the Evidence Base*,' which was submitted to the Regulation 19 consultation and sets out IM Land's position on this issue.
2. In summary, the review undertaken within the above mentioned report indicates that the full need for housing in Wycombe is higher than that concluded within the HEDNA. This would elevate the scale of unmet housing need and places greater pressure on the Council to identify additional land to accommodate the district's needs. The critique also strongly challenges the extent to which the projected need across the HMA reflects the full OAN for housing, in accordance with Planning Practice Guidance (PPG).

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. IM Land made a comprehensive submission to the draft Local Plan objecting to the both the approach taken to the site assessment process and the lack of consistency and rigor in which it was carried out. This included objections to the Green Belt Part 2 Assessment (GB1), Area of Outstanding Natural Beauty

Site Assessment Report (AONB1) and the Housing and Economic Land Availability Assessment (HELAS1).

2. In summary, the sites considered in the HELAA were restricted to those that were not major development in the AONB and were not filtered out through the Council's Green Belt Study. In other words the Council has not allowed itself to assess the relative merits of sites and their ability to contribute to the spatial strategy against the full suite of constraints in its HELAA.
3. Subsequent to the Regulation 19 consultation the Council has published additional evidence in support of its site selection process in Appendix 21 of the Statement of Consultation titled Site Assessment work arising from Regulation 19 Representations (WDLP10.21). IM Land does not consider that this additional evidence addresses its concerns and has raised an objection to this late evidence, which has not been consulted on, in its hearing statement on Matter 2.