



SUBMISSION STATEMENT

On Behalf Of

Mr Charles Pitcher

Regarding The Schedule of Matters Issues and Questions
Raised

To Wycombe District Local Plan Examination

June 2018

Our Ref: J002604/BW/NM/P

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1.0 **INTRODUCTION**

- 1.1 WS Planning & Architecture have been instructed by Mr Charles Pitcher to submit representations on the issues and questions raised by the appointed Inspector on the Wycombe District Local Plan Examination, to be held in July and September 2018.
- 1.2 The representation is in response to the need to identify further housing sites in the District and to make the fullest effort possible to meet their objectively assessed housing need, and reduce reliance on Aylesbury Vale District Council to accommodate the remainder of the identified need.
- 1.3 This representation is in response to stage 1, matter 3, question 3 as raised by the appointed Inspector in their published schedule of matters, issues and questions to the submission of Wycombe Districts Regulation 19 Local Plan publication, submitted on 28th March 2018 to the Secretary of State.

2.0 PLANNING POLICY

National Planning Policy Framework (NPPF)

- 2.1 The NPPF was published in March 2012 and sets out the Government’s framework for plan-making and decision-taking and forms the foundation for planning policy within England.
- 2.2 A ‘golden thread’ running through the NPPF is the aim to achieve sustainable development. There are three elements that contribute to sustainable development; the **economic** role, the **social** role and the **environmental** role. Paragraph **14** highlights a presumption in favour of sustainable development.
- 2.3 Paragraph **47** recognises the overarching need to “boost significantly the supply of housing” where “local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing...identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5%...maintain delivery of a five-year supply of housing land to meet their housing target....set out their own approach to housing density to reflect local circumstances”.
- 2.4 Paragraph **182** of the NPPF sets out the tests for a “sound” local plan. A plan is considered sound if it is:
- **“Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;

- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

Planning Practice Guidance (PPG)

2.5 The Planning Practice Guidance is a web-based resource that was published in March 2014, setting out national planning guidance.

2.6 The importance of the ‘Duty to Cooperate’ is highlighted in the PPG in (Reference ID: 9-002-20140306) which states:

“The duty to cooperate is a legal test that requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. It is separate from but related to the Local Plan test of soundness.

The Local Plan examination will test whether a local planning authority has complied with the duty to cooperate. The Inspector will recommend that the Local Plan is not adopted if the duty has not been complied with and the examination will not proceed any further”.

2.7 The PPG goes on (Reference ID: 9-008-20140306) to advise that:

“The duty to cooperate seeks to ensure that local planning authorities lead strategic planning effectively through their Local Plans, addressing social, environmental and economic issues that can only be addressed effectively by working with other local planning authorities beyond their own administrative boundaries. For example, housing market and travel to work areas, river catchments and ecological networks may represent a more effective basis on which to plan for housing, transport, infrastructure, flood risk management, climate change mitigation and adaptation, and biodiversity. The aim is to encourage positive, continuous partnership working on issues that go beyond a single local planning authority’s area”.

- 2.8 With regard to what actions constitute effective cooperation under the duty to cooperate, the PPG states (Reference ID: 9-011-20140306):

“The actions will depend on local needs which will differ, so there is no definitive list of actions that constitute effective cooperation under the duty. Cooperation should produce effective policies on cross boundary strategic matters. This is what local planning authorities and other public bodies should focus on when they are considering how to meet the duty. Local planning authorities should bear in mind that effective cooperation is likely to require sustained joint working with concrete actions and outcomes. It is unlikely to be met by an exchange of correspondence, conversations or consultations between authorities alone.

Authorities should submit robust evidence of the efforts they have made to cooperate on strategic cross boundary matters. This could be in the form of a statement submitted to the examination. Evidence should include details about who the authority has cooperated with, the nature and timing of cooperation and how it has influenced the Local Plan”.

- 2.9 The ‘Housing and Economic Development Needs Assessments’ Chapter sets out the support given to local planning authorities when “objectively assessing and evidencing development needs for housing” (Reference ID: 2a-001-20140306).
- 2.10 The ‘Housing and Economic Land Availability Assessment’ Chapter refers to the need for an “assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period” (Reference ID: 3-001-20140306).

3.0 ASSESSMENT OF MATTERS ARISING FROM OBJECTIVELY ASSESSED NEED FOR HOUSING

3.1 Question three under matter 3 'Housing Provision, Supply, Affordability and Gypsy and Traveller accommodation – Objectively Assessed Need for Housing' reads;

"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?"

3.2 Wycombe District Council have a memorandum of understanding with Aylesbury Vale District Council for them to accommodate the remaining 2,275 dwellings that Wycombe have identified that they cannot accommodate within the District. This was concluded to be an acceptable solution by both authorities following the findings of the Central Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA) between Wycombe, Aylesbury Vale, Chiltern District Council and South Bucks District Council. These authorities have been identified as a 'best fit' Housing Market Area (HMA).

3.3 The Aylesbury Vale Local Plan is also at Regulation 19 stage, having been submitted for examination to the Planning Inspectorate. The appointed inspector in that Local Plan examination has questioned whether it is justified to base the housing requirements for the Aylesbury Vale Local Plan solely on an analysis of the 'best fit' HMA for the four Buckinghamshire authorities. If the Inspector does not find this approach, or indeed the submitted Local Plan sound, then there will be implications for Wycombe District and they will have to begin further efforts to accommodate the identified need of 2,275 dwellings within the District.

3.4 Another issue that can arise from allowing Aylesbury Vale to claim the unmet need of Wycombe is the potential of Aylesbury Vale not delivering these houses and there being no ability for Wycombe to control this under delivery and ensure that this identified need will be met.

3.5 The Wycombe District Core Strategy (adopted July 2008) set a housing target of 8,050 dwellings over the period 2006-2026 which equated to a per annum rate of 402. The table below has been taken from the Wycombe District Monitoring Report April 2015-March 2017, published in March 2018..

Year	Net Dwelling Completions
2006-07	607
2007-08	611
2008-09	625
2009-10	304
2010-11	575
2011-12	514
2012-13	223
2013-14	266
2014-15	423
2015-16	376
2016-17	788

3.6 The average housing delivery taken from the figures above shows 482 dwelling per annum, which is above the previous target identified in the Core Strategy but clearly some way below the objectively assessed need that is identified for the District moving forward. This further clouds the confidence in Wycombe District to be able to provide the 550 dwellings per annum promised without looking to release further land and sites within the District for housing. The high delivery figure in 2016-2017 has been partly attributed to a large number of office to residential permitted development conversions.

3.7 The HEDNA states that the Council considers the new Plan and HEDNA should 're-set the clock' and the previous identified shortfall should not be met. There is no clear justification for this approach and the previous shortfall should not be 're-set' but accommodated by

the release of more land within the District, alongside the additional need met by Aylesbury Vale if their plan and this approach is found sound.

- 3.8 The question of the robustness of the District's Green Belt Part 2 Assessment has been raised in previous representations and is a matter that Wycombe need to fully address, to completely discount considering further sites for development. The general suitability of the allocated sites, with a particular focus on the explanation of exceptional circumstances, does not appear to have been clearly justified and therefore the overall document can be considered flawed and a further consultation or non-strategic sites allocation considered.

4.0 **CONCLUSION**

- 4.1 It can be concluded that the housing target for Wycombe District of 550 dwellings per annum will not be met, given the previously published figures, and as such even if the unmet need can be met by Aylesbury Vale District Council there is likely to be an under delivery on the numbers required for the District and as such further sites need to be brought forward to mitigate against this outcome.