

Sent by email to: [newlocalplan@wycombe.gov.uk](mailto:newlocalplan@wycombe.gov.uk)

26/03/2019

Dear Sir/ Madam

**Response by the House Builders Federation to the consultation on Proposed Main Modifications to the Wycombe Local Plan**

Thank you for consulting the Home Builders Federation (HBF) on the latest consultation on the main modifications to the Wycombe Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

**PMM6**

This paragraph should be updated to reflect the Government's conclusion that the 2014 based projections should be the basis against which housing needs are considered in future.

**PMM57**

We are still of the opinion that this policy is unjustified and will lead to a substantial oversupply of self builds homes. Our concern is that Council's across the country are over-estimating the number of households wanting to build their own homes and that this will leave plots vacant. At the examination in public for both the Hart and Runnymede Local Plans a review of the self-build register saw significant reduction in the number of individuals on the register. In Runnymede for example more stringent registration requirements were applied in line with national policy and saw the register fall from 155 to just 3. Without revisiting their self-build register we continue to doubt whether there is sufficient justification to warrant 5% of plots to be provided for self-build and it would be more appropriate for the council to work with land owners to identify appropriate sites for such schemes

If the policy is retained, we would suggest that a further modification is required to ensure it is sound and that decisions are informed by relevant and up to date information. We would recommend that a formal commitment is made to write to all of the individuals on the self-build register whether they are still interested in obtaining a



self-build plot in order for there to be evidence of demand for such plots in the Borough. As such the following sentence must be included in policy DM22.

*“The Council will write annually to each individual on the self-build register in order to confirm their circumstances and continued interest in remaining on the register.”*

Whilst authorities have a duty to maintain a self-build register there is no requirements with regard to keeping them up to date. In the absence of such a requirement we would suggest that such a provision be included in policy DM22. This will ensure that the Council is seeking to meet a need that is no longer present, and that decision making is informed by the most up to date evidence on needs and prevent an over provision of plots for self-build through the implementation of DM22.

## **PMM59**

Whilst we welcome the decision to use units instead of floorspace with regard to the affordable housing requirement we do not support the final levels of affordable housing being required as a result of this modification. We have concerns that the viability has not been adequately tested and that the overall level of need has not considered the affordable homes that will be delivered in Aylesbury Vale to meet the need for such homes arising in Wycombe.

### *Viability*

The testing undertaken by the Council considered options at different densities which on the basis of floorspace calculations. At lower densities, the assumption was that 40% of floorspace would equate to a 48% affordable housing requirement. However, at higher densities the position tested was 42% provision. It would appear that the Council have only considered development at the lower density in their consideration as to how many affordable homes should be provided. A similar position can be seen in the strategic sites where 40% of floorspace equates to a range of 41% affordable housing to 49%. As such it is not clear why the higher percentage reflecting a lower density position has been taken, especially given that the Government is seeking to make the most efficient use of land.

The Council should have undertaken further testing to examine the impact of applying a 48% threshold on all sites against updated development costs, the application of the policy requirements of the local plan and, where appropriate, the developer's expectations as to the cost of infrastructure provision relating to specific allocations. We are concerned that when these are applied there is a very real risk that the residual land value will fall below the value that a land owner could reasonably expect to achieve for their land. We have been made aware of the viability appraisal undertaken by our members with regard to Princes Risborough which sees land values reduce by 43%. Such a significant fall in values if seen across the Borough is likely to result in land not coming forward as expected by the Council and ultimately a need to review the plan early.

Looking back at the Council's delivery in previous years under its current policy suggests that both 48% and 35% affordable housing is too high. The Core Strategy had a similar policy to that set out in the new Local Plan. However, on examining the Council's evidence with regard to delivery indicates that they rarely achieved this aspirational target. Table 3.10 of the appendices to the Monitoring Report (March 2018)<sup>1</sup> shows that since 2006/07 the proportion of affordable housing to market homes never exceeded 33%, and in some years fell to as low as 6%. This suggests market that is not able to achieve the aspirational target set by the Council. Alongside this broad assessment table 3.11 examines this situation more detail for the 2015/16 to 2016/17 period. Delivery on sites that weren't driven by the provision of affordable housing achieved an average of 31% on site affordable housing provision. It is also important to acknowledge that this level of delivery came forward without the additional technical standards and other costs to development required by the new Local Plan.

### *Affordable housing needs*

The OAN for Wycombe District has been assessed at 13,200 dwellings. Policy CP4 makes provision for a total of 10,925 dwellings, relying upon AVDC to accommodate unmet housing needs totalling 2,275 dwellings. Paragraph 5.4 of the Housing Topic Paper submitted alongside the local plan establishes that the affordable housing need for Wycombe District is 23% of the 13,200 total housing need for the District. This equates to an overall affordable housing need totalling 3,100 dwellings.

However, of the 2,275 dwellings being delivered by AVDC 25% will be required to be affordable and will thus contribute to meeting Wycombe's affordable need. This would mean 569 dwellings are provided to meet Wycombe's needs leaving a residual need for affordable housing of 2,531 homes. The anticipated supply of affordable housing is set out in detail in Appendix 10 of the HELAA and summarised in paragraph 154 of the main document. It totals 3,065 dwellings which is 534 dwellings (21%) in excess of the residual affordable housing requirement to be met within Wycombe District. In carrying out the detailed site assessment in Appendix 10, the Council applies an indicative % to the qualifying sites with the majority of qualifying development showing an indicative delivery for affordable housing of 40%. This would suggest that the current affordable housing requirement is excessive and should be reduced to reflect what needs to be provided.

### *Conclusions on PMM59*

The NPPF and PPG are clear that is the cumulative impact of these policies must be tested, and we are concerned that the implications on development costs of the higher affordable housing requirement has not been fully considered. There is a very real risk that these policies will require land owners to sell well below the value that a land owner

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<sup>1</sup> <https://www.wycombe.gov.uk/uploads/public/documents/Planning/Planning-policy/Topic-based/Wycombe-planning-monitoring-report-technical-appendices.pdf>

could reasonably expect to achieve. This could see development come forward much later in the plan period or not at all unless the Council amends its current policies to ensure that decision makers can assume policy compliant development is viable as required by paragraph 57 of the 2019 NPPF - the framework under which this local plan will be delivered. Given the limited supply of land being released by the Council land owners are unlikely to reduce their expectation significantly to allow for such a high affordable housing requirement. This could mean that sufficient sites may not come forward as expected – delaying the delivery of much needed housing.

The rate set could also have a detrimental impact on the delivery of small sites which are affected to a far greater degree by affordable housing requirements which are a key element of the Council's housing supply, especially in the early years of the plan. Given that a high proportion of delivery in this plan will come from sites of between 10 and 100 units setting the affordable housing requirement at the proposed level will discourage smaller housebuilders from bringing small and medium sites forward.

The council should also take into account of the fact that neighbouring authorities will be seeking much lower requirements. For example, Vale of Aylesbury Local Plan, currently at EIP, has an affordable housing rate of 25% and Windsor and Maidenhead are proposing a rate of 30%. This will have the potential to deter developers from bringing forward sites in Wycombe as they will not face the considerable viability concerns in these neighbouring areas.

We would therefore suggest that the level of affordable housing required within this policy should be set a 30% for all sites. This would ensure that the Council provides sufficient headroom for development to come forward as expected in the local plan; enable it to meet the requirement of delivering 23% of its housing needs as affordable tenures and reflect what has actually been delivered in previous years.

#### **PMM71**

We continue to object to the inclusion of space standards as set out in policy DM40. Insufficient evidence has been provided to support the inclusion of these within the local plan. The Government was clear at the outset that the technical standards should only be included where they address a “*clearly evidenced need*”<sup>2</sup>. With the limited evidence base provided by the Council the policy should not be mandatory, and we would suggest a more flexible approach is required with development being required to have regard to the national minimum space standards.

#### **PM73**

Part iv of policy DM42 and the proposed amendment is not consistent with national policy. Policy DM42 restricts redevelopment of previously developed land in the Green Belt to land which is within built-up areas only and which is defined a limited infilled as referenced at Para 6.214 of the local plan. However, paragraph 89 of the 2012 NPPF

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<sup>2</sup> Written Ministerial Statement 25 arch 2015.

and paragraph 145 of the 2019 NPPF both allow limited infilling or the partial or complete redevelopment of previously developed land in the Green Belt and to place additional restrictions as the Council is proposing is contrary to national policy. We would suggest that the following amendment policy DM42 to ensure consistency with national policy:

*“vi. limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.”*

## **Conclusions**

Without the proposed amendments we do not consider the plan to be sound as considered against the tests in paragraph 182 of the 2012 NPPF.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

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