

Inspector's question 25

“Wycombe District Council's representations explicitly state that they are comments rather than soundness issues. They make a number of points of accuracy or correction. Can the Council confirm that these will be dealt with as minor changes?”

AVDC's Response to Inspector's question 25

The representations from Wycombe District Council are addressed below in the order they were raised in the original submission.

- *“HOUSING: This Memorandum of Understanding identifies that AVDC falls within the same Housing Market Area as Wycombe District Council as part of a Buckinghamshire Housing Market Area. Based on the December 2016 HEDNA Update and Bucks HEDNA Addendum September 2017 the Objectively Assessed Need for the Bucks Housing Market Area is 45,500 dwellings, of which 19,400 is for Aylesbury Vale and 13,200 is for Wycombe District. Through capacity work we have identified an unmet housing need of 2,275 dwellings that cannot be accommodated within the district due to the land supply constraints that exist. The Memorandum of Understanding agrees that this unmet housing need will be accommodated in Aylesbury Vale. We note there is an error within the VALP which identifies 2,250 dwellings for Wycombe's unmet housing need. We ask that this is corrected to be that set out in the July 2017 Memorandum of Understanding for 2,275 dwellings. We welcome the flexibility built into the VALP housing supply with a 5.2% buffer.”*

The VALP states that the unmet housing need of Wycombe is 2,250 dwellings, but the actual number is 2,275. As a point of accuracy, this will be amended by way of a minor change.

- *“AFFORDABLE HOUSING: The Memorandum of Understanding identifies that affordable housing policies in VALP will secure a proportion of affordable housing as part of delivering unmet housing needs from other plan areas within the Bucks HMA (including Wycombe District). Policy H1 of the VALP sets out residential developments of 11 or more dwellings gross, or sites of 0.3ha or more will be required to provide a minimum of 25% affordable homes on site. Currently it is unclear what this will deliver in terms of potential affordable housing supply and whether sufficient affordable housing will be provided to meet the proportion of unmet housing needs to be accommodated in Aylesbury Vale from Wycombe District. It would be helpful if this could be clarified either in the VALP or the supporting evidence base.”*

The Council acknowledges the points set out above, but proposes no changes to VALP in regard to this. The Buckinghamshire Memorandum of Understanding between Aylesbury Vale District Council, Wycombe District Council, Chiltern District Council, South Bucks District Council, and Buckinghamshire Thames Valley Local Enterprise Partnership stipulates that it is agreed that 8,000 dwellings of the unmet housing need of Chiltern, South Bucks and Wycombe will be accommodated in the Vale of Aylesbury Local Plan. It is also agreed that in delivering the unmet housing needs from the adjoining district councils to the south, VALP will be securing a proportion of affordable housing in line with affordable

housing policies in the VALP. The Housing Topic Paper accompanying VALP sets out in detail the methodology for calculating the affordable housing need and justifies the 25% affordable housing requirement for developments that exceed either 0.3 hectares or 10 dwellings. Paragraph 4.6 explains the use of the ORS Housing Mix Model and paragraph 4.7 explains the conclusion of a need for 4,200 affordable dwellings over the plan period, which is 21.8% of the forecast overall housing need for the plan period. The forecast overall housing need includes the unmet housing needs from the adjoining district councils to the south including Wycombe District Council. The VALP affordable housing figures therefore take into account the unmet housing needs of Wycombe, Chiltern and South Bucks as per the Memorandum of Understanding and states this in the supporting evidence base. As such, no changes are proposed by the Council.

- *“EMPLOYMENT: Aylesbury Vale falls within the same Functional Economic Market (FEMA) area as Wycombe District as part of the Bucks wide FEMA. We support that the VALP identifies there is sufficient employment land available in Aylesbury Vale to meet the overall forecast employment land needs across the FEMA, taking into account undersupply within Wycombe District. The Memorandum of Understanding identifies our plans will adopt a "precautionary and flexible approach to economic development including ensuring allocations are flexible to adjust to changes in the market". In light of this Policy E1 part c identifies that main town centre uses will not be supported on key employment sites, except as ancillary facilities to service a key employment site. The NPPF includes 'offices' as a main town centre use therefore this policy should be amended to take this into consideration. The references to the Bucks HEDNA, throughout the employment land chapter are also incorrect, e.g. para. 4.174 1st sentence should refer to the Bucks HEDNA Update, December 2016 (not 2015). Bucks HEDNA Addendum (para. 4.175) was produced by Atkins and ORS and was published in September 2017. Para. 4.176 refers to a property market review by the LEP. This is included as Appendix A of the HEDNA Addendum (September 2017). References should be checked accordingly.”*

The Council acknowledges the above points. The incorrect references to the Bucks HEDNA will be rectified by way of minor changes.

Policy E1 identifies that ‘main town centre uses’ will not be supported on key employment sites except as ancillary facilities. ‘Offices’ fall within the NPPF definition of main town centre uses. As such, the policy would work to prevent non-ancillary offices on key employment sites. This is not the Council’s ambition with this policy. As such, this oversight will be rectified by rewording policy E1 as set out below.

E1 Protection of key employment sites

Key employment sites will be protected through the following criteria:

- a. Within key employment sites (listed above and identified on the Policies Map) applications for B1 (light industrial), B2 (general industrial), B8 (storage and distribution) will be permitted. Other similar uses will be permitted subject to proposals not having a significant adverse impact on surrounding land uses.

- b. The use of key employment sites for employment purposes other than B1, B2 and B8 may be appropriate, if it can be proven that the use provides on-site support facilities, or demonstrates similar economic enhancement to B1/B2/B8 uses. Such development will not prejudice the efficient and effective use of the remainder of the employment area.
- c. Main town centre uses that do not fall within B1, B2 or B8 will not be supported, except as an ancillary facility to service a key employment site. Exceptionally, uses which have trade links with employment uses or are un-neighbourly in character, (such as car showrooms, tyre and exhaust centres, or trade counters), may be permitted on employment sites which have good access to a range of transport options.
- d. Other uses that do not provide direct, on-going local employment opportunities will not be permitted.