

Wycombe District Local Plan Examination: Matters, Issues and Questions**Dandara Ltd Hearing Statement (Respondent ID: 0418)****Introduction**

- 1.1 This Hearing Statement has been prepared by Dandara Ltd who are promoting residential development on 2.24 hectares of land off Clappins Lane in Naphill which is proposed for allocation in the Wycombe District Local Plan Publication Version (WDLPPV) under Policy RUR7. Dandara Ltd also owns and is bringing forward the redevelopment of the Chilterns Shopping Centre in Wycombe Town Centre under retained Local Plan Policy HWTC12 and is close to completing the construction of 42 new homes in Saunderton (ref. 14/05870/FUL).
- 1.2 The Statement concisely addresses the relevant ‘*Schedule of Matters, Issues and Questions*’ and should be read alongside representations made by Dandara Ltd to the October 2017 WDLPPV. As requested, a separate Hearing Statement has been prepared for each matter being addressed.

Matter 2 – The Plan’s Strategy**Question 3 – Is the Plan’s Spatial Strategy Consistent with the NPPF Promotion of Sustainable Development?**

- 2.1 Para. 7 of the NPPF identifies three dimensions to achieving sustainable development being economic, social and environmental. Para. 6 explains that the policies set out in the NPPF when read as a whole “... constitute the Government’s view of what sustainable development in England means in practice for the planning system”. One of the core planning principles set out at para. 17 of the NPPF is to “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”.
- 2.2 To inform the Policy CP2 spatial strategy, the WDLPPV has established a settlement hierarchy set out in Table 3 and Figure 5 informed by the production of a ‘*Settlement Hierarchy Study*’ dated September 2017 (update). Informed by an evidence base that specifically considers the sustainability of each existing settlement within the District, Policy CP2 establishes a split of development between Tier 1 and 2 settlements and Tier 3-6 settlements. The principle of the approach is supported having regard to the NPPF objective of focusing significant development in locations which are or can be made more sustainable.
- 2.3 Dandara Ltd supports the principle of the majority of new development delivered over the Plan period being directed to the most sustainable ‘Tier 1’ and ‘Tier 2’ settlements. However, having regard to the objective within para. 55 of the NPPF “to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities”, it is right that the Council should be directing a proportion of growth towards the ‘Tier 3’ higher order service villages particularly in the context of settlements such as Naphill which the ‘*Settlement Hierarchy Study*’ considers as “Naphill/Walters Ash, Marlow Bottom and Lane End are all well served by key services and have some higher-order services” (pg. 13).

- 2.4 The spatial strategy approach set out in WDLPPV Policy CP2 will ensure that the majority of development is directed to the most sustainable Tier 1 and Tier 2 settlements whilst also recognising the important role that sustainable Tier 3 ‘higher order service villages’ can play in accommodating new homes which support the vitality of these communities as well as providing choice in the market for new homes. This approach is echoed on pg. 90 of the SA (September 2017) which reads “... housing has been identified in the rural areas to provide flexibility for rural enterprises to grow and adapt. This may have positive effects for the economy and contribute towards meeting local housing needs, having a positive effect on community vitality”.
- 2.5 Wycombe as a District benefits from a wide range of sustainable villages which have grown over time and play an important role in supporting the vitality of the rural area. Policy CP2 allows these villages to continue to grow and thrive where it is sustainable to do so, with particular focus on the most sustainable Tier 3 ‘higher order service villages’. It therefore forms an appropriately aspirational, but locally specific basis for supporting growth within the most sustainable villages which is a consideration under Question 1 of Matter 2.
- 2.6 Policy CP2 of the WDLPPV is therefore sound as ‘consistent with national policy’ and ‘justified’, being the most appropriate strategy when considered against reasonable alternatives, having regard to para. 182 of the NPPF.

Question 5 – Is the Spatial Strategy Positively Prepared, Justified and Effective?

- 3.1 As explained above for question 3, the spatial strategy set out in Policy CP2 of the WDLPPV is considered ‘justified’, recognising the importance of directing the majority of future growth to the most sustainable Tier 1 and Tier 2 settlements but in parallel, acknowledging the value of maintaining the vitality and important role that Tier 3 ‘higher order service villages’ play in supporting a thriving rural hinterland to the main urban areas. A comfortable balance has been achieved between the level of growth focused towards the principal Tier 1 and 2 urban areas those Tier 3 settlements that play an important role in maintaining the vitality and overall sustainability of those ‘higher order service villages’.
- 3.2 The spatial strategy is also considered to be ‘effective’ by recognising the role that small and medium scale sites focused at Tier 3 ‘higher order service villages’ can play in meeting a housing need arising from existing sustainable villages across the District. These are places that have historically accommodated growth to become self-contained sustainable communities in their own right and it is entirely appropriate that they continue to experience growth to maintain and support their ongoing vitality and viability within the WDLPPV.
- 3.3 Small and medium scale sites within Tier 3 ‘higher order service villages’ also assist with helping WDC establish and maintain a five year housing land supply as generally being deliverable without reliance on strategic infrastructure improvements required alongside some of the larger, strategic allocations. They also provide for real choice in the market for those who wish to live in the rural part of the District rather than its main urban areas. Section 6 of the NPPF specifically focuses on ‘delivering a wide choice of quality homes’ including in rural areas which is a para. 55 contributor of achieving the Framework’s definition of sustainable development.

- 3.4 The spatial strategy is also ‘positively prepared’ by ensuring that the WDLPPV can deliver objectively assessed housing need in a sustainable manner working alongside AVDC under the Duty to Cooperate. The requisite HMA Authorities who jointly commissioned the Buckinghamshire HEDNA recognise that objectively assessed housing needs are established looking at the functional HMA as a whole, rather than applying somewhat arbitrary Local Authority boundaries, and therefore for each spatial strategy to be considered ‘positively prepared’ it should be able to meet full housing needs within a HMA context which the WDLPPV does, including within AVDC under the Duty to Cooperate (WDLPPV, para. 1.15 and Figure 2).

Question 6 – Is the Settlement Strategy Positively Prepared, Justified and Effective?

- 4.1 The settlement strategy established by Policy CP3 of the WDLPPV is sound having been informed by the overall sustainability of each settlement and their ability to accommodate additional growth in accordance with the three strands of the NPPF definition of sustainable development. The approach is set out in full within the ‘*Settlement Hierarchy Study*’ dated September 2017 (update), which applies a range of sustainability indicators via detailed settlement audits.
- 4.2 It is understood that the level of growth identified for various settlements, including Naphill, is a function of applying ‘policy-on’ constraints, particularly Green Belt and AONB designations, rather than an outcome of the sustainability of the settlements. If such ‘policy-on’ constraints did not exist, it would be reasonable to expect ‘higher order service villages’ such as Naphill to accommodate more housing, and potentially a greater proportion than the 15% share provided for in Policy CP2 given the ‘*Settlement Hierarchy Study*’s conclusion that “*Naphill/Walters Ash, Marlow Bottom and Lane End are all well served by key services and have some higher-order services*” (pg. 13).
- 4.3 The settlement strategy is therefore considered to be sound as ‘positively prepared’ and ‘justified’, informed by a ‘policy-off’ evidenced assessment of settlement sustainability within the September 2017 ‘*Settlement Hierarchy Study*’ (update). It is however considered that for the WDLPPV to be more flexible should additional needs for housing arise in the future, that a distinction is made within Policy CP3 between Tier 3 and 4 ‘higher order’ and ‘other service villages’ to allow a sequential approach to site selection to be taken based on the relative sustainability of each settlement. This would mirror the approach taken to Tier 1 and 2 settlements within Policy CP3 where a specific distinction is made between Tier 1 High Wycombe as a ‘large urban area’ and the Tier 2 ‘market towns and other major settlements’.

Question 8 – Is the Spatial Strategy Sufficiently Flexible

- 5.1 Dandara Ltd would reiterate that the level of growth identified for numerous settlements, including Naphill, is not a determinant of the application of the settlement hierarchy and sustainability of settlements established by Policy CP3 but is an outcome of ‘policy on’ constraints relating particularly to Green Belt and AONB designation. The ability of the spatial strategy to respond to deliver additional homes in a flexible manner is therefore constrained by national designations and would require key site selection evidence base documents to be reviewed in light of changing circumstances as part of a future Local Plan review process.