

# **Wycombe District Local Plan Examination**

## **Matter 2 – The Plan’s Strategy**

### **Examination Statement by Nexus Planning on behalf of Inland Homes**

1. These statements have been prepared by Nexus Planning on behalf of Inland Homes. In addition to draft housing allocations HW8 and HW9, Inland Homes is promoting two omission sites, being land at Penn Road, Hazlemere and land at Burleighfield House, Loudwater.

**Question 3: Is the Plan's Spatial Strategy (Policy CP2) consistent with the requirement of the NPPF to promote sustainable development?**

2. Inland Homes supports part '1b' of the spatial strategy identified at Policy CP2 in terms of the general approach to the distribution of development, which involves focussing the majority of the housing requirement to the four larger settlements in the District, in particular High Wycombe which is the principal and most sustainable settlement in the District.
3. However, our Regulation 19 representations to Policy CP2 and Matter 1 Statement explains our significant concerns with the approach to major development in the AONB advocated by Policy CP2 i.e. not to allocate such sites. Overall, we consider that part '1a)i' of Policy CP2 has failed all four of the soundness tests identified at paragraph 182 of the NPPF as follows:

- **Positively prepared** – WDC's approach has always been predicated upon exporting the balance of its unmet housing need, with the only reason that the quantum of this need has been reduced is as a result of challenge by AVDC (within the GL Hearn Review of Housing Capacity in New Wycombe Local Plan Consultation Draft [August 2016]) (HELS6). WDC's strategy in relation to the AONB is not to allocate 'major development' options, without the benefit of a detailed site-by-site analysis. The draft WDLP is not therefore prepared based on a strategy to meet objectively assessed development and infrastructure requirements;
- **Justified** – The Framework requires local plans to be the most appropriate strategy, when considered against the reasonable alternatives. However, WDC has failed to consider whether development could be appropriately accommodated in the AONB, therefore this was not considered as a reasonable alternative within the SA to exporting its unmet housing need;
- **Effective** – To be effective the WDLP should be deliverable over the plan period and based on effective joint working on cross-boundary issues. The additional requirement to satisfy the unmet need of WDC and Chiltern District / South Bucks District clearly places AVDC in a highly challenging position, having to cater for 41% more housing than its own need (based upon its own figures), and also noting that our evidence in our Regulation 19 representations identifies that AVDC's OAN is substantially higher (and now likely to increase further in light of the 2016-based population projections). Therefore not only will WDC not have control over delivering its housing need, in exporting its unmet need it places a burden on AVDC, which may not be deliverable and the Memorandum of Understanding (MoU) between AVDC and WDC on unmet needs provides no agreement for AVDC to continue to accommodate WDC's unmet needs should its OAN significantly increase. The Council's decision to automatically discount development in the AONB if it is

'major' leads inevitably to a higher unmet need in WDC, this does not constitute "effective" plan-making;

- **Consistent with national policy** – Paragraphs 115 and 116 provide for restricting development in AONBs however it is not an 'automatic' test. Whilst undoubtedly they set a high bar to development in an AONB they, do not preclude it absolutely. WDC has taken the policies as such and simply undertaken a high level assessment of the paragraph 116 tests to effectively post justify this approach. This has fettered the Council's discretion as to the selection of sites to meet their housing needs and resulted in a failure to fully explore the potential of 'major' sites within the AONB in the same way it has considered sites outside the AONB or comprising minor development in the AONB.

**Question 5: Has the Plan's Spatial Strategy been positively prepared, is it justified and will it be an effective mechanism for delivering growth over the Plan period?**

- a) **Does the Plan's Spatial Strategy represent an effective approach to delivering sustainable development (Policy CP1) over the Plan period?**
- b) **What are the key components of the Plan's Spatial Strategy and how do they interact?**
- c) **Does the Plan's Spatial Strategy effectively link transportation, employment and housing growth?**

4. Please see our response to Question 3 and 6.

**Question 6: Has the Settlement Strategy (Policy CP3) been positively prepared, justified and will it be effective in delivering sustainable growth?**

- a) **How has the settlement hierarchy been defined and what level of growth is proposed for each tier?**

5. Policy CP3 identifies that the High Wycombe area, as the only Tier 1 settlement in the District, will be the 'prime focus for development'. This is the most sustainable location in the District and Inland Homes therefore supports this approach.

6. However, our Regulation 19 representations to Policy CP4 and Matter 3 Statement identify that the Council's OAN figure of 13,200 dwellings over the period 2013-2033 is demonstrably too low. Any additional housing accommodated within the District should follow the existing settlement hierarchy defined in Policy CP3.

**Question 8: Is the Spatial Strategy sufficiently flexible and can it respond effectively to changing circumstances?**

7. No.

8. Table 4 of WDLP1 demonstrates that there is no flexibility in the Council's housing land supply, when measured against its reduced housing requirement. Any delay in the delivery of allocated sites, some of which are significant and highly complex, or the reduction in capacity of any allocated sites would result in an immediate shortfall in housing, with no apparent mechanism to address this. Clearly this is at odds with paragraph 14 of the Framework, which requires Local Plans to contain sufficient *"flexibility to adapt to rapid change"*.
9. Furthermore, and as detailed within our Matter 3 Statement, Aylesbury Vale's own housing needs are likely to rise significantly relative to the Council's latest assessment, having regard to the Government's standardised methodology and the recent 2016-based population projections. The Wessex Economics Housing Delivery Study for Buckinghamshire (HELS8) indicated that AVDC could just about support planned levels of growth but only through a number of new initiatives. Further growth in housing pressures in this area only places even greater uncertainty on the ability of AVDC to deliver Wycombe's unmet needs.
10. Having regard to the fact that WDLP2 states increasing growth in the District (whilst not allocating major development in the AONB) would result in the removal of moderately and strongly performing Green Belt sites, that the Council's housing land supply position is so fragile and that further significant housing pressures are arising in the HMA, it is considered that the overall spatial strategy outlined at Policy CP2 of WDLP1 should remove any express reference to not allocating sites that constitute major development in the AONB. Whilst it is noted that the Council considers this to be the most appropriate strategy (an approach we do not accept for the reasons set out in our Matter 1 Statement), this is based upon the Council's analysis of evidence at this point in time and its assessment against paragraph 116 of the Framework. It cannot of course rule out this situation changing, particularly in light of the issues already outlined.
11. Removing this AONB restriction from the spatial strategy would ensure it is sufficiently flexible and can respond effectively to changing circumstances, without the need for a partial Local Plan review to alter a recently adopted spatial strategy.