

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) as 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 3 - Housing Provision, Supply, Affordability and Gypsy and Traveller Accommodation

Questions 1 and 2 – HEDNA and OAN of 13,200 Dwellings over Plan Period (660 dpa)

- 2.1 It is noted that the 2016-based SNPP have been published to be followed by the 2016-based household projections. It is expected that the implications of these latest projections will be considered at the hearing sessions and through supplemental written submissions. This response will focus solely upon the content of the HEDNA which uses the 2014-based projections which represented the most up-to-date information available at the time as required by national policy.
- 2.2 Dandara Ltd supports the overall methodology applied within the HEDNA to establish full, objectively assessed housing need as required by para. 47 of the NPPF and summarised within amended Figure 122 on pg. 42 of the 2017 HEDNA addendum report. This comprises:
 - Establishing the demographic starting point applying the 2014-based household projections as the most up-to-date evidence of future housing need (n.b. soon to be superseded by 2016-based projections as explained in para. 2.1);
 - Applying an adjustment to the demographic starting point by applying a longer-term 10 year migration trend which is less likely to be influenced by short-term unrepresentative trends which may unduly distort housing need projections being made for WDC over a twenty year period 2013-33. When taking into account allowances for transactional vacancies and second homes, the ‘unadjusted’ housing need for WDC equates to 10,923 which is only 68 dwellings short of the demographic starting point in any event;
 - Applying an adjustment for suppressed household formation rates. This establishes what Figure 122 refers to as a ‘baseline demographic housing need’ which is 216 dwellings in excess of the demographic starting point of 10,991;
 - No adjustment is made in response to balancing jobs and workers having regard to economic and jobs growth planned within the WDLPPV. The unadjusted OAN figure is

sufficient to meet housing demand arising from future jobs growth planned for within the District;

- In recognition of various market signals and affordability indices, a 20% upward adjustment is applied equivalent to + 1,901 (n.b. deducting separate adjustment made for household formation rates).

- 2.3 The full OAN identified within amended Figure 122 of the 2017 HEDNA addendum report is considered to represent full, objectively assessed housing need as defined by para. 47 of the NPPF applying a methodology which is in accordance with the NPPF and PPG.

Question 3 – Meeting OAN within Policy CP4

- 3.1 As explained within para. 4.36 of the WDLPPV and within amended Figure 122 of the 2017 HEDNA addendum report, the OAN for WDC is 13,200 homes over the period 2013-33 equating to 660 dpa. As explained within various evidence base documents which have informed the preparation of the WDLPPV, not all 13,200 homes can be accommodated within the District without conflicting with the NPPF definition of sustainable development. As para. 4.36 explains, *“Wychcombe is proposing to build 10,925 over the plan period, or about 550 a year. Aylesbury Vale District Council has agreed to take our ‘unmet need’”*.
- 3.2 The PPG explains that *“a housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work”*. Furthermore, *“the extent of the housing market areas identified will vary, and many will in practice cut across various local planning authority administrative boundaries”* (para: 010, ref ID: 2a-010-20140306). The PPG goes on to reiterate the requirement placed on LPAs by para. 47 of the NPPF to meet full, objectively assessed needs and where they are unable to do so, the requirement placed on LPAs under the Duty to Cooperate to work effectively on strategic planning matters, including housing, that cross their administrative boundaries (para: 021, ref ID: 9-021-20140410).
- 3.3 The WDLPPV is sound as ‘consistent with national policy’ by recognising that the NPPF para. 47 obligation to meet full, objectively assessed housing need is discharged applying the para. 14 presumption in favour of sustainable development if this would result in any adverse impacts of doing so significantly and demonstrably outweighing the benefits or specific policies in the NPPF indicate development should be restricted. The evidence base to the WDLPPV, particularly in respect of Green Belt and AONB, has demonstrated that full, objectively assessed need cannot be met within WDC without the para. 14 exceptions applying.
- 3.4 The Council then rightly sought to engage with neighbouring Authorities under the Duty to Cooperate to establish whether they could accommodate unmet need without undermining the sustainability principles of the NPPF. A functional HMA exists with AVDC as shown within Figure 2 of the WDLPPV which comprises the whole of the District and the central and southern half of AVDC including Aylesbury itself. It is important to reiterate the PPG guidance set out in para. 3.2 above which makes clear that the WDLPPV is not proposing to ‘decant’ housing into AVDC for the very reason that both Authorities comprise a single HMA defined by evidenced linkages between jobs and homes that are unconstrained by arbitrary LA boundaries. The approach in the WDLPPV is therefore to provide some homes within

AVDC under the DtC which falls within the same functional HMA with no demonstrable different in the function of the housing market as a result.

- 3.5 The Vale of Aylesbury Local Plan (VALP) 2013-2033 has similarly been submitted for examination and confirms at Policy S2 that 2,250 will be delivered to address unmet need arising from WDC. These 2,250 homes added to the 10,925 homes identified within WDLPPV Policy CP4 gives a total of 13,175 which is sufficient to meet the 13,108 OAN figure identified within the 2017 HEDNA addendum report in accordance with para. 47 of the NPPF. As Aylesbury town falls within the HMA, in reality, any of the 16,398 new homes planned for the town within the VALP would be attractive to those who may otherwise have chosen to live within Wycombe District notwithstanding that HMA geographies do not allow for such a distinction to be made. See *'Proposed Unmet Housing Need Duty to Cooperate Memorandum of Understanding between Aylesbury Vale District Council and Wycombe District Council'* (MOU3).

Question 4 - Will There be a Five Year Supply of Housing Over the Plan Period?

- 4.1 It is the intention of Dandara Ltd to submit a detailed planning application for the development of land off Clappins Lane, Naphill (RUR7) immediately following the adoption of the Local Plan and the removal of the site from the Green Belt. Formal pre-application engagement has already been undertaken with the Local Authority under ref. P117/00364/LEV2 both to inform the number of dwellings being proposed within WDLPPV Table 20 for Policy RUR7 and to allow the submission of a planning application immediately following Plan adoption. The delivery of the dwellings over the period 2021/22 to 2022/23 at 32 dpa as shown in Appendix 7 of the HELAA (2017) is therefore considered to be conservatively realistic for land off Clappins Lane, Naphill.

Questions 5, 6 and 7 – Deliverability of Proposed Allocations

- 5.1 The deliverability of land off Clappins Lane, Naphill (RUR7) as defined by para. 47 of the NPPF will be considered in detail under Matter 9, Question 1(g). This will consider the NPPF para. 47, footnote 11 deliverability tests from a site specific perspective. Our Statement prepared under Matter 9, Question 1(g) will demonstrate that proposed allocation RUR7 is supported by a robust and comprehensive site assessment methodology to demonstrate availability and deliverability, supplemented by detailed pre-application discussions with the Authority to ensure delivery immediately following adoption of the Plan.
- 5.2 We do not consider that the Plan should include a policy for the phased release of land for housing under Question 7(b) which would unduly constrain the ability of housing to come forward in response to demand and would significantly reduce the flexibility of the Plan should certain sites experience delays or challenges in coming forward when envisaged within the housing trajectory.