



Report to Wycombe District Council

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an Inspector appointed by the Secretary of State
for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

REPORT ON THE EXAMINATION OF THE WYCOMBE CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

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2007

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List of abbreviations used in this report

AONB	Area of Outstanding Natural Beauty
CS	Core Strategy
DPD	Development Plan Document
FPEC	Further Pre-Examination Change
LDF	Local Development Framework
LDS	Local Development Scheme
MOD	Ministry of Defence
PEC	Pre-Examination Change
PPG2	Planning Policy Guidance Note 2: Green Belts
PPG17	Planning Policy Guidance Note 17: Planning for Open Space, Sport and Recreation
PPS1	Planning Policy Statement 1: Delivering sustainable development
PPS3	Planning Policy Statement 3: Housing
PPS6	Planning Policy Statement 6: Planning for Town Centres
PPS7	Planning Policy Statement 7: Sustainable development in rural areas
PPS9	Planning Policy Statement 9: Biodiversity and Geological Conservation
PPS12	Planning Policy Statement 12: Local Development Frameworks
PPS25	Planning Policy Statement 25: Development and Flood Risk
RPG9	Regional Planning Guidance for the South East
RSS	Regional Spatial Strategy
SAC	Special Area of Conservation
SADPD	Site Allocations Development Plan Document
SCI	Statement of Community Involvement
SEP	South East Plan
SFRA	Strategic Flood Risk Assessment
UCS	Urban Capacity Study
WCBV	Western Corridor/Blackwater Valley
WDC	Wycombe District Council

Introduction and Overall Conclusion

- 1.1 Section 20(5) of the Planning & Compulsory Purchase Act 2004 provides that the purpose of an independent examination of a development plan document (DPD) is to determine whether it:
 - (a) satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document; and
 - (b) is sound.
- 1.2 This report assesses the Wycombe Core Strategy (CS) against the above matters and sets out my recommendations, together with the reasons for them, as required by s20(7) of the Act.
- 1.3 My report considers the CS against the nine tests of soundness set out at paragraph 4.24 of PPS12. Under national policy, a DPD is presumed sound unless shown to be otherwise from evidence considered at the examination. Consequently, the changes recommended in this binding report are only those necessary for the CS to overcome some aspects of unsoundness under the tests.
- 1.4 The CS was submitted in April 2006. In February 2007 the Council advertised an extensive set of Pre-Examination Changes (PECs), *"prompted by a number of representations....and also in response to emerging experience resulting from the first few CS public examinations around the country"*. In September 2007 the Council advertised a smaller number of Further Proposed Pre-examination Changes (FPECs). Some of the PECs/FPECs successfully deal with valid soundness issues that had been raised. However, this report necessarily considers the soundness of the submitted CS.
- 1.5 The report begins with conclusions on the procedural tests, (i)-(iii). It then considers 18 issues covering the tests of conformity, coherence, consistency and effectiveness, (iv)-(ix). I conclude that the CS contains some unsound elements, although these can all be rectified by making appropriate changes. One such change is particularly worthy of note. This is deletion of policy 6(1) - High Wycombe Town Centre. In that case I have not found a robust and convincing evidence base to demonstrate that the policy is sound under test viii (implementation). Deletion of the policy will enable the Council to give further consideration to its subject matter and, if appropriate, bring forward sound proposals in a review or future DPD. I am satisfied that this change does not remove the overall integrity of the CS. Consequently the Council will be able to make progress with the Site Allocations DPD, the next crucial element of the Local Development Framework (LDF) to 2026.
- 1.6 None of my recommended changes undermines the processes of sustainability appraisal and front-loaded public participation undertaken by the Council during the evolution of the CS, both at the various pre-submission stages and at the PEC/FPEC stages. Having said this, my recommendations include some substantial

redrafting in the case of policies 2, 3 and 15. There are three main reasons for this.

- 1.7 Firstly, the extent of the PECs/FPECs in itself reflects a need for some significant replacement of the submitted text. Secondly, some of the more important background material in the submitted CS is now outdated by new national and regional guidance in PPS3 and the report of the Panel appointed to consider the draft South East Plan (SEP), published in August 2007. These documents were central to some discussions at the hearings, and it was generally agreed that the Panel report provides a firm 'direction of travel' and is now a basic foundation for a sound CS, particularly in the context of rising regional demographic and housing pressures. Both need to be taken on board by the CS as far as possible in order to provide a clearer focus for the increased District and sub-regional housing requirements. In making the necessary changes I draw upon (but do not restrict myself) to the updated text provided by the Council at my request.
- 1.8 Thirdly, the Council accepted at the exploratory meeting and at other times that some reordering of the contents of the CS would reduce lack of clarity and create a more appropriate, concise and user-friendly CS with less repetition. It is not my remit to make the CS "more sound" in these respects, and I have not directly sought to do so, but my recommendations relating to the substantive soundness issues bring benefits in these respects too.
- 1.9 In summary, the main changes needing to be made to the CS are to:
- a) replace policies 2 & 3 with a single new policy entitled "Main principles for the location of development" (Recommendation 2)
 - b) delete policy 6(1) and make some changes of emphasis to policies 6(2) - 6(4) (Recommendation 3)
 - c) include specific reference to a minimum number of new dwellings at Princes Risborough (Recommendation 4)
 - d) retitle policy 10 "Reserve locations for future development", and include Gomm Valley as one such, rather than adding it to the Green Belt under policy 11 (Recommendations 6 & 7)
 - e) delete policy 13 (Recommendation 8)
 - f) delete policy 4 and change policy 15 to provide the SADPD with a clearer strategic brief on housing provision, taking account of PPS3 and the recommendations of the SEP Panel (Recommendation 10)
 - g) delete parts 1 & 2 of policy 16, retaining and changing part 3 concerning gypsies and travellers, and travelling showpeople (Recommendation 11)
 - h) change policy 19 to provide a locally based, more cohesive framework (Recommendation 13)
 - i) retain Appendix 3 only in relation to the housing trajectory, deleting most of the rest of its content, although with a small number of references moved elsewhere (Recommendation 17).

2 Procedural Tests - tests (i) to (iii) - PPS12 para 4.24

- 2.1 The CS was prepared in accordance with the general timescale in the Council's Local Development Scheme (LDS), so test (i) is met.
- 2.2 The Council's Statement of Community Involvement (SCI) was not formally adopted until October 2006, after the submission of the CS. However, the Council clearly undertook extensive consultations at the various preparatory stages of the CS and I find nothing to suggest a lack of compliance with the requirements of the 2004 Regulations or the then emerging SCI. Test (ii) is therefore met.
- 2.3 Likewise, test (iii) is met because WDC carried out sustainability appraisals at all stages of the CS preparation process (issues and options, preferred options, submission, and pre-examination changes). In addition, Appropriate Assessment was undertaken in accordance with the Habitats Directive in order to assess any potential effects arising from the CS on 3 candidate Special Areas for Conservation (SACs). Two are partly within the District (Aston Rowant and Chiltern Beechwoods) and one is outside (Burnham Beeches). No significant direct effects on any SACs were identified.

3 Conformity, Coherence, Consistency and Effectiveness Tests - tests (iv) to (ix) - PPS12 para 4.24

- 3.1 The South East England Regional Assembly found the CS in general conformity with adopted RPG9 and the draft SEP, so test iv is met in that respect.
- 3.2 ***Issue 1 – Does the CS provide a clear and appropriate spatial vision for the District in the period to 2026, adequately linked with the emerging requirements of the South East Plan?***
- 3.3 CS paragraphs 3.1-3.8 set out a general vision of Wycombe District in 2026 in text which is "shared" with the Community Strategy. These paragraphs generally meet (albeit in a brief and somewhat anodyne way) the requirement of para 2.9 of PPS12 that a "spatial vision" should be included as a key element of a CS. They also ensure that test v is met.
- 3.4 However, two changes to these paragraphs are necessary under other tests. Firstly, it is important (under test iv) that the CS vision specifically commits to meeting the SEP housing requirements by 2026. Secondly, the regional hub of High Wycombe will be the focus of most of the change in the District over the next 20 years, so compliance with test vii requires the section relating to the town to precede those parts of the spatial vision referring to the smaller towns and the rural areas. These changes create no substantive conflict with the Community Strategy, but make the paragraphs sound in CS terms.

- 3.5 **Recommendation 1** The following changes are required to make the CS sound:

Paragraph 3.2: Change the first sentence as follows - "The substantial new housing requirements set for Wycombe District in the South East Plan have been met. However, the District is still..."

Paragraphs 3.7-3.8: Bring forward the section on High Wycombe to precede that relating to Marlow.

- 3.6 ***Issue 2 - Does the CS provide a clear and appropriate strategy for the location of development?***

3.7 The CS deals with this issue at policies 2 and 3, respectively entitled "Locational strategy" and "Sequential approach to allocating land for residential and business development". Some extensive changes proposed in the PECs/FPECs would widen the scope of policy 3 and try to clarify the approach to the various tiers in the "box" accompanying the policy.

3.8 However, it is inappropriate and confusing to broaden policies 2&3 (and the "box" to policy 3) to provide a strict sequential framework governing the allocation of land for these purposes. Firstly, PPS3 no longer uses the term and secondly, national policy does not apply the test to other forms of development except in the case of town centre uses, where the geographical context is quite different and greenfield/brownfield issues do not apply.

3.9 The Council's PECs to the box include some necessary expansion. I agree that clarity requires identification of the settlements regarded as comprising (i) the High Wycombe Urban Area and (ii) the list of main villages, although the former needs correction to accord with the places named in paragraph 4.6. However, the changes to tier 2 make the policy needlessly complex, while tiers 3&4 are not necessary. As I conclude elsewhere in this report, the latter two deal with circumstances that are unlikely to arise much before the end of the CS period and, if they do, will require consideration of wholly new locations and options. In that case the CS would need fundamental review. A sound approach, compatible with tests iv and vii, thus requires the amalgamation of the relevant subject matter of CS policies 2 and 3 into one new policy entitled "Main principles for the location of development", retaining the relevant gist of each. For the same reasons I recommend briefer paragraphs of reasoned justification rather than the complex, lengthy and inappropriate additions set out in the PECs.

3.10 Some expansion and strengthening of the indicators for the new combined policy is necessary in order to achieve an adequate monitoring framework under test viii.

- 3.11 **Recommendation 2** The following changes are required to make the CS sound:

Policies 2 & 3: delete both policies and combine their relevant subject matter into a new policy entitled "Main principles for the location of development" as follows:-

"The principal focus for new development will be High Wycombe (including the adjoining settlements of Downley, Hazlemere/Widmer End/Tylers Green, Loudwater and Wooburn Green). The emphasis in this area will be on:

- regenerating and transforming key areas of change at High Wycombe, as shown in Figure 4.1 and set out in policy 6; and*
- respecting and improving the physical and community identity of the adjoining settlements and preventing further coalescence.*

In identifying land for development at High Wycombe, the main emphasis will be upon the re-use of previously-developed land. However, greenfield land at the reserve locations may be allocated as and when necessary to achieve secure supplies of land to meet the development needs of the District.

In all cases: -

- sites must be well located in relation to jobs, services and facilities and in the most accessible locations for transport by non-car modes; and*
- full regard will be had to environmental assets, constraints and opportunities; and*
- existing infrastructure and services must have adequate capacity to serve the new developments, or secure arrangements for appropriate increased capacity must be in place.*

At Marlow, Princes Risborough and the other smaller settlements identified in policy 9, development will be on a smaller scale and of a character commensurate with the size and relative sustainability of the settlements.

Elsewhere, the emphasis will be on protecting the rural character of the District. Development will only take place where it supports the rural economy and the vitality of local communities and is compatible with policies for protecting the Green Belt, the Chilterns Area of Outstanding Natural Beauty and other rural parts of the District."

Indicators: change as follows-

"Quantities and percentages of new residential and business developments taking place on brownfield and greenfield sites (respectively) in the following areas:- (a) High Wycombe urban area, (b) Marlow, (c) Princes Risborough, (d) the "identified rural settlements" and (e) the remainder of the District.

Quantities and percentages of new residential development within (a) walking distance and (b) 30 minutes travel by public transport of a GP/health centre, hospital, primary and secondary schools, and a significant concentration of employment."

Delivery: delete the two bullet points relating to policy 2, retaining those for policy 3

Figs 4.1a & 4.1b: include the diagrams from the PECs entitled "main settlements within the Western Corridor and Blackwater Valley part of the District", and "District-wide map"

*Reasoned justification: replace paragraphs 4.4 to 4.16 as follows-
"The strategic context for Wycombe District is provided by the emerging regional spatial strategy – the South East Plan. This places the south eastern part of the District within the wider Western Corridor and Blackwater Valley sub-region, one of the most successful and dynamic parts of the South East in economic terms. 90% of the housing growth required of the District by the South East Plan will therefore take place in this area.*

Most of the District's growth will be concentrated at High Wycombe, which has the greatest concentration of jobs, services, and transport and other facilities and is therefore the most sustainable location for growth. Reflecting those factors, High Wycombe is identified in the South East Plan as a regional hub. This role is to be supported and developed by (a) prioritising measures to increase accessibility by public transport, walking and cycling, (b) encouraging higher density and/or mixed land uses in order to create 'living centres', (c) prioritising the development of high quality interchange between modes of transport, and (d) focusing new housing development in locations close to or accessible by public transport.

The emphasis of growth at High Wycombe will be on urban regeneration, and restructuring, selective intensification and consolidation - ie "urban renaissance", particularly within the key areas of change identified in this strategy. Opportunities for the outward growth of the town are limited by the constraints of the Chilterns Area of Outstanding Natural Beauty and the Metropolitan Green Belt. However, some limited areas on the edges of the town have long been safeguarded for future development and may need to be drawn upon at appropriate dates in order to meet the needs of this strategy.

As shown in figure 4.1a, a number of distinctive settlements/communities either adjoin or are closely adjacent to High Wycombe. These are Downley, Hazlemere/Widmer End/Tylers Green, Loudwater and Wooburn Green. In core strategic terms these are part of the wider urban area of High Wycombe. However, any development at these settlements must respect and contribute to their physical and community identities.

Outside High Wycombe development will be on a much smaller scale. At Marlow and Princes Risborough development must be consistent with the aims of the community strategy (see

paragraphs 3.1 – 3.8). Elsewhere in the District it should be of a scale and character commensurate with the size and relative sustainability of individual settlements in terms of their range of services, facilities and employment and their access to public transport. In arriving at this approach a range of options was reviewed through the sustainability appraisal process, including reviewing in broad terms the relative sustainability of the main settlements. This work is set out in the Final Sustainability Appraisal report.

The Core Strategy reflects national and regional emphasis on making the most of development opportunities on previously-developed land within urban areas and the other larger settlements, insofar as this is compatible with any site-specific constraints and limitations. These are the most sustainable locations for development. However, in order to secure an adequate supply of land to meet the development needs of the District it may also become necessary to allocate land at the reserve locations identified in policy 10. These are mainly on the edge of High Wycombe.

On present known requirements it is unlikely to be necessary to identify any significant areas of green field land, other than the reserve locations, much before the final years of this 20-year Core Strategy to 2026. If this were to become necessary this strategy would probably need to be subjected to a fundamental review, following a reappraisal of other growth options taking account of a wide range of planning and environmental constraints, including Green Belt."

- 3.12 ***Issue 3 – Does the CS provide a coherent and appropriate spatial vision for High Wycombe with clear mechanisms for implementation in the period to 2026?***
- 3.13 Policy 5 sets out main principles intended to govern development in the town over the next 20 years, while policy 6 expands upon the aims for four identified key areas of change.
- 3.14 Policy 5 commands general support and will be sound if small changes are made. Firstly, to bring compliance with test iv, the introduction to part 2 needs a slightly different emphasis to reflect the expanded role of regional hubs, following the SEP Panel report. Part 2f can then be deleted, as it becomes tautological.
- 3.15 Secondly, I support the PECs to parts 4 & 5, appropriately making more direct reference to respect for the town's inherited assets and Hughenden Stream. Thirdly, reference to relocation of Amersham & Wycombe College should be placed within policy 5 rather than appendix 3, which will be deleted (see recommendation 18).

- 3.16 Policy 6(1) High Wycombe Town Centre In September 2005 the Council issued a background paper entitled "Re-shaping High Wycombe: stage 2 of developing a Masterplan for High Wycombe". This covers not only the town centre, but also Desborough and the Hughenden Corridor, two of the other three key areas of change covered by policy 6. The paper indicates that the masterplan *"should not be taken as a blueprint. It sets out our aspirations, and shows one way that (they) can be achieved (although) there are other ways (of achieving) the same aspirations..."* It also states that *"As yet, these ideas are not backed up by a detailed implementation programme"*.
- 3.17 The masterplan is couched in a consultative vein, but nonetheless outlines broad proposals for key areas within the town centre, allocating these to various phases up to 20-25 years ahead. Policy 6(a) picks up some very general themes from the masterplan, most of which, eg (a), (b) and (e), reflect objectives that would be entirely expected in a town centre of High Wycombe's character and regional status, and are sound.
- 3.18 However, theme (c) states *"Pedestrians – create a coherent and continuous pedestrian movement environment integrating the existing and expanded town centre and surrounding areas"*, and theme (d) refers to *"Integrated transport – secure changes to the road network, location of car parks and traffic management that assist in delivering improved pedestrian integration, cycle and bus priority, and deliver a high quality interchange facility at the railway station."*
- 3.19 At para 4.29 the CS states *"Central to the vision is the re-routing of the A40 which currently uses the Abbey Way Flyover. This is divisive and damaging to the town's economy, restricting the natural flow of pedestrian movement from the established town centre to the new Eden development. The re-routing of this road provides the potential to create an integrated enlarged town centre.....This vision is illustrated in Figure 4.2. More detailed proposals will be brought forward in a Site Allocations Development Plan Document"*. Figure 4.2 (Vision for the integration of the High Wycombe Town Centre) shows the bare bones of the existing and potential structures, with the flyover shown among a *"line of existing routes for possible removal/reduction of traffic and potential for bus priority, pedestrian space or development."*
- 3.20 Re-routing the combined A40/A4128 is an entirely supportable objective: as I experienced on a number of occasions (including on dark evenings and in wet weather), pedestrians suffer frustratingly poor connectivity and interrupted desire lines when attempting to negotiate paths between various points within the present town centre to the east of Abbey Way and others to the west of it at the Eden Centre, the bus station, the university, the hospital, and the Desborough area. The opening of the Eden Centre in March 2008 will exacerbate this strong sense of separation and risk severe

division of the town centre's attractions unless this "central" issue is resolved as soon as possible, otherwise the enlargement referred to above will have occurred, but any guarantee of integration will be sorely lacking.

- 3.21 The master plan envisaged relocation of the road within some 5/10 years of 2005, which could still be up to 7 years after the Eden Centre opens. However, the evidence base does not yet confirm that satisfactory re-routing of this heavily-used and important A road can be achieved within that or any other timescale, or even at all. The Council's statement summarises the current position at para 2u. *"All that can be said with confidence at this stage is that the Council's aspiration to reduce traffic dominance in an important part of the town centre is fully in keeping with current policy directions at national, regional and local levels, and the technical work that has been carried out to date does not rule it out as a sensible aspiration. There is no absolute measure of an acceptable level of deterioration in conditions for people engaging in one form of movement to achieve a level of betterment for others who are moving about in different ways or using the space for non-movement activities. Care has also has to be taken to ensure that displaced traffic does not damage the environment elsewhere in the town. However, there currently appears to be a reasonable prospect that a further development of the options can produce a result that meets some or all of the current aspirations without unacceptably compromising other interests".*
- 3.22 It was suggested on behalf of one participant that a straightened-out version of the alternative route indicated on the Proposals Map of the Preferred Options SADPD (which would have a number of tight bends) would give rise to major queuing at certain junctions and car parks - up to 2.8km at peak hours. The County and District Councils responded to this by expressing the view that this alternative was over-engineered. However, it is as yet unproven whether or not a less-engineered solution, more in line with the Manual for Streets, would be able to provide an adequate alternative channel through or around the town centre for the traffic wishing/needing to use this busy route. All that the authorities could offer by way of assurance were phrases such as "There is a long way to go, but we're very hopeful of closing the gap.....It looks as if it may be do-able...."
- 3.23 "Aspiration" will often be a desirable component of a CS providing a spatial vision for 20 years ahead, but it seems to me crucial that something which is so "central" to that vision needs to be particularly clearly underpinned by both a robust evidence base (test vii) and a clear mechanism for implementation (test viii).
- 3.24 Rather than getting nearer to meeting these tests, the suggested amendments put forward by WDC seem to me to compound, rather than resolve, the uncertainty. These were (1) to amend the first sentence of para 4.29 to read: "Central to the *long term* vision is

the re-routing of the A40..." and (2) to add to the paragraph as follows: *"The scope to realise the vision fully and the timescale within which this may be achieved will depend on a number of factors including the outcome of further traffic modelling work, progress on traffic management and improving alternative transport modes, and the deliverability of alternative traffic routes."*

- 3.25 In my view these suggestions go to the heart of the soundness of policy 6(1). These additions to the CS would place too much emphasis on test (ix), flexibility, at the expense of tests (vii), the evidential base, and (viii), mechanisms for implementation. The CS would effectively be stating that it is unknown whether there is a reasonable prospect of achieving this central part of the vision within a reasonable and foreseeable timescale, or whether it may turn out to be an unrealisable aspiration.
- 3.26 I therefore reach the conclusion that the proposals for the town centre [policy 6(1), Figure 4.2, and paragraphs 4.28 to 4.31] should be deleted from the CS. This will leave the Council with the option of bringing forward a separate, more convincingly founded town centre strategy - one capable of dealing with the divisive effects of the elevated road while also demonstrating soundness.
- 3.27 I have considered whether, despite its current failings, policy 6(1) could be retained within the CS, leaving the road-related issues for resolution through the SADPD after work has been completed on the feasibility of an alternative route and the means and date by which it is likely to be delivered. However, I do not find that an appropriate outcome. Even though other recommendations in this report could have an effect on the currently-expected timescale for completing the SADPD process, it is important not to delay it any more than necessary. I also doubt whether the District-wide scope of the SADPD makes it the appropriate vehicle for concentrating attention at the level of detail necessary to provide a satisfactory framework for delivering the amount and complexity of change contemplated in the town centre master plan. Having said this, the current Local Development Scheme (LDS) does not currently propose bringing forward an Area Action Plan for the Town Centre, so no other approach to the town centre is currently available.
- 3.28 Policy 6(2) Desborough Area Desborough's townscape is disjointed and degraded, lacking overall identity or coherence. There are some streets of Victorian houses intermixed with smaller buildings and factories but many parts are dominated by a varied range of mediocre larger buildings resulting from gradual piecemeal redevelopment since WW2. Many of these structures are now becoming redundant and present a significant number of large new redevelopment opportunities.
- 3.29 The bullet points in policy 6(2) identify a number of individually appropriate aims that the Council will seek to apply to those redevelopment schemes as they emerge, but the CS provides no

assurance that the sum effect of all these individual redevelopments will secure any greater coherence for Desborough than it has at present. Individual schemes may “tick the boxes” of policy 6(2) and be of good quality in themselves but the present content of the CS provides no guarantee that the sense of place of Desborough will have gained any more coherence or distinctiveness after all this change to the urban fabric has taken place.

- 3.30 It would be a wasted opportunity not to harness all the changes that will occur in Desborough in the service of a clear place-making and urban design framework to which all developments will be required to contribute. I accept that the area has ethnic diversity and experiences considerable economic and social problems, but this only raises the case for a strong place-making agenda leading to a significant environmental uplift and a better shared sense of place. I conclude that the policy fails to adequately recognise advice on design in PPS1, or make the most appropriate use of this opportunity. To secure compliance with tests iv and vii an additional bullet needs to be inserted to commit to the task of providing the necessary framework.
- 3.31 Policy 6(3) Hughenden District The principles set out are sound and generally supported, although there will be room for future debate about whether future proposals in the SADPD, the Hughenden Quarter Concept Statement and any individual planning applications fully reflect the various broad principles in the CS. I find no reason to change policy 6(3) other than slight further amendment of the Council's PEC in order to clarify the nature and purpose of the new road under test vii.
- 3.32 Policy 6(4) M40 Gateway The text of policy 6(d) is somewhat short of strategic detail about the type and general scale of development expected at the gateway but nonetheless provides a broadly coherent and appropriate spatial vision for this key area. However, in my view two changes are required. Firstly, the key diagram indicates that the safeguarded land at Abbey Barn North and South is generally embraced within the scope of the M40 Gateway key area of change, as is the land at former RAF Daws Hill. Although the future of these areas needs to be considered in the context of the SADPD, an additional bullet point needs to be added to policy 6(4) to require attention to securing all possible synergies between the development of these areas and other land closer to the heart of the gateway area near the motorway junction. Without this, there is a danger of failing to secure the full potential of any mutually-reinforcing benefits from the development of these sites, especially if that were to occur in separate phases over different timescales.
- 3.33 Secondly, I agree the necessity of amplifying paragraph 4.40 to achieve soundness under test vii by imposing requirements for scrutiny of proposals for their impact on local roads, including the complex and heavily used Handy Cross junction. I have slightly

amended the terms of the relevant PEC to emphasise that local developments should only have to deal with their own generated effects, not the wider sub-regional problems of the M40/A404/M4 motorway box in general.

- 3.34 With regard to the intended replacement of the Sports Centre, this currently occupies a highly prominent site and its relocation, either here or elsewhere in the town, would probably offer the main opportunity to enhance the image of the gateway and the sense of arrival at this entrance to the town. There could be a number of exciting options for this site, so planning for this project (including consideration of any linked PPG17 issues) will be a key issue for the SADPD. It will be vital to make the most of this landmark site and secure a worthy building(s). However, there is no firm evidence base, nor history of public consultation, to support more detailed specification in the CS now about what should happen at the site.
- 3.35 The diagrammatic depiction of the Gateway in the CS also raises soundness concerns. These stem from the content of the "M40 Gateway Background Paper (September 2005)". The options in that consultation paper discuss a number of sites and linked highway scenarios, some including development south of the M40 within the AONB.
- 3.36 The text of the CS does not appear to contemplate development within the AONB; nor does the Preferred Options SADPD. However, the gateway is depicted in the CS [in the key diagram, in Figure 4.1, and in Figure 4.1a, introduced through the PECs] as a lozenge-shaped area embracing extensive areas on both sides of the motorway and stretching west-east roughly from Wycombe Air Park to the Abbey Barns sites. The diagrams are potentially misleading through being open to interpretation that they imply "in principle" endorsement of development in the AONB, despite the lack of any explanation in the CS about how major development in this nationally protected landscape would be justified against the stringent tests set out in PPS7. It is therefore understandable that they cause uncertainty and anxiety. This conflict with soundness test iv can be resolved by redrawing the "lozenge" so that it does not cross the firm line of the M40.
- 3.37 **Recommendation 3** The following changes are required to make the CS sound:

Policy 5: change as follows -

Part 2(Introduction): change "sub-regional centre" to "regional hub"

Part 2(d): change to "New development to support higher and further education including development of Bucks New University and relocation of Amersham and Wycombe College to a central location"

Part 2(f): delete

Part 4: insert "respect," before "preserve"

Part 5: insert "and Hughenden Stream" after "River Wye"

Reasoned justification:

Para 4.22, third bullet – delete “transport”

Para 4.24 – replace “Buckinghamshire Chilterns University” with “Bucks New University”

Policy 6(1): Delete

Reasoned justification: Paras 4.28 to 4.31: Delete

Key diagram and Figure 4.1: Delete references to town centre

Figure 4.2: delete

Policy 6(2): Add new first part as follows – “Sense of place – Provision of a firm place-making and urban design framework to ensure that individual developments contribute to a coherent and recognisably distinctive sense of place for Desborough.”

Reasoned justification to policy 6(3): change second sentence of para 4.36 as follows – “The provision of a new avenue through the redeveloped corridor will create more capacity for public transport by removing some traffic from Hughenden Road and improving residents’ quality of life.”

Policy 6(4): delete “transport” in part (d), and add new part (h) as follows – “Synergies between major development sites – considering the potential for major development sites in the gateway to play complementary and mutually-supporting roles and ensuring that all such opportunities are seized.”

Reasoned justification: Paragraph 4.40 - add the following at the end of the paragraph: “It is essential that any proposals for the area are fully assessed for their impact on the local and trunk road network, including the Handy Cross motorway junction. The assessment should identify any mitigation measures directly necessitated by the proposals and the means of implementing them, including making or contributing to any appropriate proposals to improve accessibility to the area by sustainable non-car modes.”

Key Diagram, Fig 4.1, and Fig 4.1a (introduced via the PECs and Recommendation 2 above): Change the depiction of the M40 Gateway area of change to exclude land south of the motorway.

- 3.38 **Issue 4 – Does the CS provide a coherent and appropriate spatial vision for Princes Risborough with clear mechanisms for implementation in the period to 2026?**
- 3.39 Policy 8 identifies a number of main topics, under six key headings, setting the stage for further policy development through the LDF and other mechanisms. These topics are generally based on local

consultation that took place in the context of the Risborough 2035 study and the preparatory stages of the CS. In the main, they are sound. However, the second sentence of the introduction is inappropriately "development control" oriented, whereas most of the work to be undertaken on the key headings will take place in other contexts. Change is needed to meet test viii.

- 3.40 Turning to housing provision in Princes Risborough, the SEP Panel's recommendations slightly increase the required annual build-rate in the northern part of the District (for which the town is the focus) to 40pa. If pro-rata allowance is made for distributing the inherited backlog discussed under issue 10 below this rises to 41.25pa (a total of 825 in the period 2006-26).
- 3.41 The Panel's recommendation in relation to housing in market towns such as Princes Risborough is that housing (especially affordable housing) should be provided "sufficient" to meet "identified needs". No specific calculation has been made of these needs and the CS does not specify, as a matter of policy, what proportion of the SEP requirement for the northern area should be at Princes Risborough as opposed to other smaller settlements in the north of the District.
- 3.42 It is notable that, because of declining average household size, the annual build-rate of 24pa in Princes Risborough over the 20-year period 1981-2001 served only to achieve population stability of around 8000. The town is roughly equidistant (about 7 miles) from two regional hubs at Aylesbury and High Wycombe, the former being a particularly significant growth pole. Care must therefore be taken that Princes Risborough remains strong enough (in the face of increased competition from these sources) to be able to consolidate its own local role as the main centre for the north of the District, in accordance with the shared vision of the Community Strategy and CS.
- 3.43 If the annual build-rate in 2006-2026 remains at least similar to that achieved in 1981-2021 the town's demographic stability should be retained in the face of continuing decline in household size, which would help Princes Risborough to achieve its identified role. That rate would deliver 480 new dwellings by 2026, ie 58% of the total non-WCBV requirement of 825, allowing for the backlog discussed below under issue 10. In my view it is appropriate and necessary under test vii to include that figure in policy 8 as a firm minimum guide for the SADPD, otherwise there may be reliance on too great a proportion of the "non-WCBV" requirement being met in a more adventitious manner by small developments in the less sustainable rural settlements. This level of continuing completions in the town should not be difficult to achieve in land supply terms as table 4.10 of the housing update paper shows the identified urban potential of the town as 289, ie 25 completions in 2006/07 and 264 dwellings on other sites at various stages of working through the planning process and with a reasonable prospect of development within 10 years.

- 3.44 Table 4.10 indicates a longer-term baseline urban potential for the town (to 2026) of 510, more than would be required to deliver 24pa over the 20-year period. However, this relies on an input of windfalls both pre and post 2017. Although such gains will continue across the area, and will be picked up during annual monitoring, they are not a basis for firm forward planning post-PPS3. It is therefore possible that some new sites in the town may need to be identified in the SADPD, or a future review of it, in order to bridge the gap between a total of 480 and the presently-identified supply. However it is unlikely that much, if any, greenfield land will need to be identified for release pre-2026. In that respect the regional context has substantially changed since the Local Plan was adopted in 2004. Nonetheless, it is inappropriate under test vii (and unnecessarily prescriptive at this stage) for policy 8 to rule out the option entirely. The words "within the built-up area" in part 1(a) therefore require deletion.
- 3.45 Other elements of unsoundness require change, ie strengthening the requirement concerning sewage treatment in part 1(d) as stated in the Council's PEC, and correction of the reference to Marlow under "Indicators".
- 3.46 **Recommendation 4** The following changes are required to make the CS sound:

Policy 8: *change as follows –*

- second sentence to read – "The following six headings identify the main areas for policy development through the LDF and other appropriate mechanisms:-"

- part 1(a) to read- "Identify specific opportunities to provide a minimum of 480 new dwellings (possibly as part of mixed use developments), particularly affordable housing including homes catering for the needs of younger people."

- part 1(d) to read – "Ensure that there is adequate sewage treatment capacity to cater for wastewater flows generated by new developments."

Indicators: refer to "Princes Risborough", not "Marlow".

- 3.47 ***Issue 5 - Does the CS provide a coherent and appropriate spatial vision and policies for the rural settlements and areas?***
- 3.48 Policy 9 (rural settlements and the rural areas) is generally sound, save for some defects arising from lack of clarity and coherence. Firstly, part 2 requires clarification by naming "the identified settlements", which the Council intends to be those specified in the PECs to policy 3. Secondly, part 6 fails to convey that it is the "particular character" of "individual villages and hamlets" that needs respect, rather than some ubiquitous "special" character. Thirdly,

the constituent parts of policy 9 need consistent grammatical expression to give them clear and coherent meaning.

- 3.49 **Recommendation 5** The following changes are required to make the CS sound:

Policy 9: Change as follows -

(part 1): change "encourage" to "encouraging"

(part 2): change to "providing housing within Bourne End/Wooburn, Flackwell Heath, Great Kingshill, Marlow Bottom, Lane End, Naphill/Walter's Ash, Stokenchurch and Longwick, and identifying opportunities....."

(part 4): change to "supporting implementation of rural traffic management initiatives to protect local character and prevent rat runs"

(part 6): change to "ensuring that new development respects the particular character and sense of place of individual villages and hamlets"

- 3.50 **Issue 6 – Does the CS make appropriate proposals for meeting long-term development needs (safeguarded land)?**

3.51 Dealing first with the principle of safeguarded land, PPG2 provides (para B2) that such land "comprises areas and sites which may be required to serve development needs in the longer term, ie well beyond the plan period." Para B6 indicates that "Development plan policies should provide that planning permission for the permanent development of safeguarded land should only be granted following a (plan) review which proposes the development of particular areas of safeguarded land." The Council accepts that this approach makes it inappropriate to continue to use the term "safeguarded land" if the land in question may be needed to meet development needs before 2026. It therefore suggested "reserve locations" as an appropriate alternative description for the areas listed in policy 10. In my view this would be an important change as it removes unsoundness under test iv and can be linked with a plainer, more appropriate direction for the SADPD to give detailed consideration to the potential contribution of these sites to the supply of land for housing and other identified needs, and the relative phasing and timing of any necessary land releases. I make further reference to this matter under issue 10.

3.52 I next turn to the four areas of safeguarded land identified in the CS at policy 10. Since 1954, when Green Belt boundaries were first defined within Bucks, the two areas comprising Abbey Barn North and Abbey Barn South have always been regarded as land set aside to meet possible future development needs. During this period the title of the designation has changed from "white land" to "area of special restraint" (in 1989) and finally to "area of safeguarded land" (in 2004), but the underlying purpose of excluding the sites from the Green Belt has remained unchanged for over 50 years.

- 3.53 As the CS indicates (and as the Local Plan Inspector recorded in detail) both of these sites are affected by a number of constraints. As a result the Council estimates that their total net developable area is about 20ha, compared with their overall gross area of 43ha. For the strategic purposes of the CS the Council's modest assumption is that that Abbey Barn North could accommodate about 100 dwellings and Abbey Barn South a range of some 350 dwellings (in a mixed-use scheme) to 550 (in a wholly residential scheme). I consider it sound to retain these areas as reserved locations under policy 10 and accept these broad indications of their development capacities.
- 3.54 Terriers Farm has the same Green Belt history as the Abbey Barns sites, although part of it was included in the Chilterns AONB in 1965 and then removed in the 1990 review. Although subject to some constraints, the Local Plan Inspector found this to be a high-performing site which would form a logical urban extension to High Wycombe. It was therefore allocated for development in the Wycombe Local Plan, subject to a phasing policy. Although local residents are still resistant to the development of Terriers Farm I find no reason (including consideration of the matters raised in the recent Secretary of State decision) why it should not be retained as a reserve location that can be drawn upon if necessary in the period to 2026, as determined through the SADPD process.
- 3.55 Slate Meadow has a slightly different history. Originally designated white land in 1954, it was included in the Green Belt in 1972 (through the Bucks County Development Plan) before being excluded again in 1989 (through the High Wycombe Area Local Plan), when it reverted to status as an area of special restraint and subsequently became safeguarded land in 2004.
- 3.56 Like the other areas of safeguarded land, Slate Meadow has its own particular constraints, most notably the recently registered village green and some areas forming part of the floodplain. The Council therefore assesses the potential capacity of its net developable area at about 150 dwellings. I recognise that local residents value the present open nature of this land but find no reason to disagree with the Local Plan Inspector's view that the developable portions of the site perform relatively highly in sustainability terms. I find no exceptional circumstances to justify including the site in the Green Belt and thus fundamentally altering the role assigned to it for all but 17 of the past 54 years.
- 3.57 Although a PEC seeks to place Slate Meadow in a separate category from greenfield areas directly adjoining High Wycombe urban area, I find no reason to support this. Its capacity is modest when set against the total strategic housing requirement for the District and the land is not far removed from the outer edge of High Wycombe. In any case Slate Meadow has fairly high sustainability credentials in its own right, being within walking distance of Bourne End

Station, albeit that this is on a branch line. Overall the PEC would add complexity to the CS to no obvious benefit. In my view the relative merits and priorities of the policy 10 sites, including Slate Meadow, are best left to be decided through detailed consideration in the SADPD.

- 3.58 **Recommendation 6** The following changes are required to make the CS sound:

Policy 10: *change title to "Reserve locations for future development", and change the text as follows -*

"The following are identified on the Key Diagram (Appendix 1) as reserve locations for future development (not listed in priority order).

Abbey Barn North, High Wycombe

Abbey Barn South, High Wycombe

Gomm Valley, High Wycombe

Slate Meadow, Bourne End

Terriers Farm, High Wycombe

The Site Allocations DPD will consider the extent of any development needs that may require to be met at these locations, any local constraints to their development, the nature and timing of any allocations, the exact boundaries of any land to be developed, and the relative priorities between/phasing of the sites.

Before release of any land at these locations all necessary infrastructure will need to be provided, including solutions that deliver sustainable transport modes and minimise congestion."

Indicator: *change to read "Total areas of potentially developable land available at the reserve locations"*

Delivery: *change first bullet to read "Detailed identification of, proposals for, and prioritisation of reserve land in the Site Allocations Development Plan Document"*

Reasoned justification:

Para 4.51: [Delete]

Para 4.52: replace as follows - "Areas of land around High Wycombe have long been excluded from the Green Belt and treated as land safeguarded to meet future development needs beyond the timescale of successive plans. While the main emphasis continues to be on development of previously developed land within urban boundaries, needs arising from the South East Plan to 2026 are likely to generate a requirement to draw upon some or all of these areas by that date. Some formerly safeguarded locations are no longer regarded as appropriate for future development and are being taken into the Green Belt (see policy 11). However, the locations listed above are now to be treated as a pool of reserve land that may be allocated in whole or part through the forthcoming Site Allocations DPD, or future reviews of it. Work undertaken for

the Site Allocations DPD will therefore need to consider the nature and timing of any needs to allocate these areas for development, any local constraints to their development, the exact boundaries of any land to be developed, and the relative priorities between (and the phasing of) any allocations at these locations."

Para 4.53: change as follows – "Any proposed development at the reserve locations must provide for necessary accompanying infrastructure, especially that which supports communities and provides for sustainable transport solutions."

Para 4.54: change as follows - "It should also be recognised that the reserve locations all have individual constraints on the amount of development which they can accommodate. At Abbey Barn North landscape and ecology considerations provide significant limits to the developable area. At Abbey Barn South, there are major issues of transport accessibility, and woodland places a substantial limit on the developable area. At Terriers Farm there is an important need to retain a green wedge through the site while at Slate Meadow there is a designated village green and parts of the area are within a higher risk zone for flooding. These and any other relevant constraints will need to be carefully taken into account in any future development of these areas."

3.59 *Issue 7 – Are the CS proposals for amending Green Belt boundaries strategically appropriate and supported by exceptional circumstances?*

3.60 The CS proposes boundary changes to include three areas in the Green Belt for the first time – Grange & Widmer Farms, Lane End Road and Gomm Valley. Since 1954, when Green Belt boundaries were first defined within the county, these areas (like the Abbey Barns sites discussed above under issue 6) have been regarded as land set aside to meet possible future development needs under successive policy designations - "white land" until 1989, "areas of special restraint" until 1989, and "areas of safeguarded land" from 2004.

3.61 Dealing first with the two areas at Grange & Widmer Farms and Lane End Road, these were both included in the Chilterns Area of Outstanding Natural Beauty (AONB) when it was first designated in 1965. At that point a major policy tension was created with the then pre-existing status of both areas as "white land". The single criterion for designation of AONBs under the National Parks and Access to the Countryside Act 1949 ("outstanding natural beauty") is the same as the first of the two criteria for designating National Parks, and the primary purpose of AONB designation is to "conserve the natural beauty of the landscape". In March 2001 the responsible Minister re-confirmed the parity of status of National Parks and AONBs in terms of landscape protection, while PPS7 (paras 21-23) specifies a set of challenging criteria for judging proposals for "major development" in AONBs. Urban extensions would certainly fall into that category.

- 3.62 Set against this statutory and policy background, PPG2 requires (para B2) that safeguarded land *"should be genuinely capable of development when needed"*. Although there is some local variability in the quality and intactness of these tracts of landscape they are, as a whole, generally consistent with the standard and character of the adjoining areas of the AONB. It would be incompatible with the statutory purpose of designation to reserve or allocate these areas for development for significant urban extensions or other major building projects which would have the inevitable effect of removing their role as integral parts of the protected Chilterns landscape. The areas therefore cannot be regarded as meeting the fundamental PPG2 requirement of genuine capability for development. No evidence was available about whether their overlapping status as both AONB and safeguarded land is unique on a county-wide or national basis but on the basis of the statutory and policy background and the landscape quality of these areas I conclude that it would be illogical to further perpetuate this conflicting double designation.
- 3.63 The areas in question are capable of contributing to Green Belt purposes (Nos 1-3 and 5 in the case of Grange and Widmer Farms), and 1, 3 and 5 in the case of Lane End Road) and the factors discussed above represent very strong exceptional circumstances for including them in the Green Belt. As this is a fundamental alteration to their previous long-term status I support the principle of expressing this change as part of the core strategy.
- 3.64 Turning to Gomm Valley, this is another area which has never been included in the Green Belt. However, unlike the two areas above, it has never been included in the AONB - either at original designation or during the boundary review, concluded in about 1990.
- 3.65 I recognise that the Countryside Commission's recommendation to the Secretary of State at that time was contrary to the view of the Chilterns Standing Conference, which reflected many local views. I also saw that there are attractive views up the dry valley from a number of viewpoints, eg the Peregrine Business Park, the local nature reserve, and a number of footpaths in the area. As the Local Plan Inspector put it, the *"overall impression (of the valley is) of very high landscape value, of comparable quality to much of the AONB"*. However, he found no exceptional circumstances warranting removal of its safeguarded land status and, 7 years further on, it is apparent that regional policy will require High Wycombe to continue making a sustained contribution to housing growth pressures to at least 2026.
- 3.66 There are some strong constraints to development within the valley including the nature reserve, areas of existing woodland, urban separation issues, and other important ecological/landscape considerations such as those identified in the Gomm Valley Landscape Character Assessment. Together, these place firm limits

upon the net developable area, so that substantial parts of the valley would remain undeveloped. On the Council's estimate, made at my request, the maximum notional development capacity of the valley could be up to 300 dwellings, plus 3.5ha for other uses. On another estimate the outline scheme produced at the local plan inquiry in 2000/2001 (based on an overall developable area of about 18.3 ha) could equate to about 550 dwellings if development at this location were to consist only or mainly of housing, or a smaller number of dwellings in a mixed scheme. These would be significant contributions to the District's substantial land supply needs during the CS period and, as I discuss under issue 10, it is unclear that a firm PPS3-compliant land supply to 2026 can be assured without Gomm Valley being drawn upon at some stage.

- 3.67 The valley has been excluded from the Green Belt for over 50 years in order to provide a reserve for future development needs. It would therefore be illogical now to place it into the Green Belt at a time when pressures may at some point require its long-intended purpose to be fulfilled. Moreover, it seems to me that there is good reason for the present Green Belt boundary here because the more developable southern parts of the valley are for the most part enclosed to the west by housing development on the ridgeline, to the south by the railway embankment and the urban area beyond it, and to the east by further residential development, albeit that this becomes progressively more low density and less visible moving northwards from the railway bridge towards Tylers Green.
- 3.68 In view of the above considerations there are no exceptional circumstances to warrant making the Council's proposed change to the Green Belt boundary in the Gomm Valley area. This aspect of the CS is therefore unsound against tests iv and vii and should be deleted, with Gomm Valley retaining its status as an area to meet future development needs, ie a "reserve location" under policy 10.
- 3.69 Referring briefly to the much smaller-scale suggested changes to the Green Belt boundary in the vicinity of Gomm Valley, I do not regard these as having core strategic significance. If exceptional circumstances can be advanced to justify any minor, non-strategic changes to Green Belt boundaries in the District these should not be considered piecemeal, but in a comprehensive way through the Site Allocations DPD or another "lower-tier" DPD. This approach is re-emphasised in my recommendation below.
- 3.70 Finally, the CS also proposes to exclude Adams Park stadium from the Green Belt. This was newly-built in 1990 on a greenfield site and is now a substantial modern sporting arena enclosed on all four sides, with a capacity of about 10,000. The ground is shared by Wycombe Wanderers FC and London Wasps RUFC and has a range of office, commercial and visitor accommodation of the kind often associated with professional sports clubs. These facilities are used daily and generate a significant amount of activity and employment, which is much supplemented on match days.

- 3.71 The stadium is excavated into the slope and this partly mitigates its physical impact on the landscape, but this is now a developed, heavily-used site, no longer possessing the necessary openness to fulfil Green Belt purposes. I therefore support the Council's view that (a) these exceptional circumstances justify the stadium's removal from the Green Belt and (b) the change is of sufficient strategic importance to warrant being effected through the CS. The open match-day car park on the hillside above the stadium would appropriately remain in the Green Belt.
- 3.72 The Council's PECs propose some detailed changes to policy 11 and the accompanying text, updating some references and identifying the Green Belt purposes fulfilled by the land now to be included within it. Insofar as they relate to the boundary changes which I have supported, I accept these changes as necessary for the CS to achieve coherence.
- 3.73 **Recommendation 7** The following changes are required to make the CS sound:

Policy 11: *change as follows:*

"The Green Belt will be protected from inappropriate development as defined in Government policy.

Land is added to the Green Belt at (a) Grange and Widmer Farms, High Wycombe and (b) Lane End Road, High Wycombe. Land is removed from the Green Belt at Adams Park Stadium. The detailed boundaries of these sites are shown on the maps at Appendix 2, will be shown on the proposals map, and will be carried through into the Site Allocations DPD."

Target/Indicator: change to read "No strategic changes to the Green Belt in the forthcoming Site Allocations DPD other than those highlighted above"

Delivery: change as follows - "Any appropriate minor changes to Green Belt boundaries to be defined through an appropriate Site Allocations Development Plan Document"

Reasoned justification

Paragraph 4.55: change as follows – "The Council supports the protection of the Green Belt and the five purposes for its designation set out in Government policy in PPG2, and will protect the Green Belt from inappropriate development. The South East Plan indicates that the Wycombe area is one where small scale reviews can be undertaken through the process of Local Development Frameworks. However, exceptional circumstances will still need to be demonstrated for any changes to Green Belt boundaries, as required by PPG2. Based on current expectations of future development requirements, it is not expected that a

comprehensive strategic review of the Green Belt will be required, if at all, much before the end of the core strategy timescale to 2026."

Paras 4.56 & 4.57: [Delete]

Para 4.58: change as follows "Despite the lack of need for a comprehensive review there are two areas where locally-significant core-strategic additions to the Green Belt are justified (Grange and Widmer Farms, High Wycombe and Land at Lane End Road, High Wycombe) and one (Adams Park Stadium) where deletion of land is appropriate. The two areas to be added to the Green Belt have effectively been safeguarded to meet possible longer term development needs since 1954. However, both are within the Chilterns Area of Outstanding Natural Beauty, the statutory purpose of which is to conserve and enhance the natural beauty of the landscape. Government policy in PPS7 therefore excludes major development other than in exceptional circumstances."

Para 4.59: [Delete]

Para 4.60: change as follows - "Given this situation, and the requirement in PPG2 for safeguarded land to be genuinely capable of sustainable development when needed, it is no longer tenable to regard these areas as long-term reserves for future development. Moreover, these areas all perform a number of the five Green Belt purposes set out below. The land at Grange & Widmer Farms fulfils purposes 1, 2, 3 and 5, while the land at Lane End Road fulfils purposes 1, 3 and 5.

- 1. To check the unrestricted sprawl of large built-up areas*
- 2. To prevent neighbouring towns from merging into one another*
- 3. To assist in safeguarding the countryside from encroachment*
- 4. To preserve the setting and special character of historic towns*
- 5. To assist in urban regeneration by encouraging the recycling of derelict and other land."*

Para 4.61: change as follows - "The land to be removed from the Green Belt is the built-up area and hard-surfaced surroundings of Adams Park Stadium, the home of both Wycombe Wanderers FC and London Wasps RUFC. The open hillside car park will remain in the Green Belt. The construction of this substantial stadium has removed the essential Green Belt characteristic of openness from the site and its continued inclusion in the Green Belt is now a major anomaly having regard to the purposes of the Green Belt. However, the removal of the stadium from the Green Belt in no way dilutes the need to find long term solutions to the transportation and parking problems associated with the stadium. The area remains in the Chilterns Area of Outstanding Natural Beauty and this also remains a very important consideration."

Other consequential changes:

Executive summary of the CS: remove the reference to "Gomm Valley" and change the reference to "Causeway Stadium" to "Adams Park"

3.74 ***Issue 8 – Does the CS provide clear and appropriate strategic policy and guidance for the town centres and retail development?***

3.75 Policy 12 contains a clear statement of the hierarchy of the Town, District and Local Centres in Wycombe and the types of uses appropriate to them. This provides generally coherent guidance for other levels of the LDF and for development control purposes. On the other hand policy 13 adds no vital Wycombe-specific strategic guidance to the content of PPS6 or the general principles outlined in policy 12. In my view it confuses rather than clarifies. Part 1 is somewhat repetitive of the content of policy 12 while part 2 does not fully reflect advice in PPS6 with regard to impact assessment. It also focuses too much on the sequential approach rather than the wider advice about selecting sites for development in paragraph 2.28 of PPS6. This policy is unsound under tests iv and vii and should be omitted. The indicators and delivery bullet points included after policy 13 also relate to policy 12 and can therefore be placed in front of paragraph 4.62. The text at paragraphs 4.64-66 can also be retained since it, too, generally relates to policy 12.

3.76 **Recommendation 8** The following changes are required to make the CS sound:

Policy 13: Delete

Indicators and delivery: place text after policy 12, deleting words in brackets relating to "policies 12 and 13"

Reasoned justification: retain paragraphs 4.64–66 as part of the justification for policy 12.

3.77 ***Issue 9 – Does the CS provide clear and appropriate core strategic policy and guidance on land for business?***

3.78 The CS is generally consistent with the key recommendations of the Wycombe Economy Study (carried out by WS Atkins and dated October 2004) and the recommendations in the SEP Panel report. The latter criticises the lack of strategic quantitative guidance in the draft SEP about future requirements for business land. However, in the absence of this, the Panel recommends change to policy WCBV4 to provide that needs for new employment floorspace shall be met, to the extent possible, through more efficient use of existing employment land in town centres and established employment areas. LDFs are to give priority to the retention of existing employment land in that use but the overall adequacy of existing land is to be determined by joint working between the sub-regional authorities looking at local and strategic demand for employment floorspace, the broad balance between labour supply and demand, the suitability of employment land to continue in that use and the scope for any housing needs to be met through release of

employment land. If existing land is judged insufficient, new areas of employment land are to be identified in LDFs in line with sustainable urban extensions. This approach therefore envisages that LDFs in the sub-region may provide not only for intensified use of existing business land but also for some inappropriate land to move out of that use and other more suitable land to take its place.

- 3.79 CS policy 14 focuses on the approach to be taken to regeneration and intensification within four types of business sites, with the aim of increasing the qualitative supply of employment land. This approach would continue past trends, the net result of which has been that redevelopment of existing land has produced greater numbers of jobs on reduced areas of retained employment land. The policy also allows for the identification of additional sites, although the specification that these should be "within the urban area of High Wycombe" is inappropriate under test vii and places unjustified restriction on the SADPD, bearing in mind WDC's acceptance that areas of "safeguarded land" should be regarded more positively as "reserve locations" if they are likely to be drawn upon during the lifetime of the CS. The less prescriptive term "at High Wycombe" therefore needs to be used. Clarification is also needed that part 2 refers to "new sites" rather than "new business development" as the latter will normally occur on existing sites. However, I find no firm evidential base for greater geographical specificity in the CS about any preferred new locations. That matter can be resolved through the SADPD. In view of my recommendations 2 and 10, I delete the cross-references to policies 3 and 4.
- 3.80 The Atkins study envisages a net loss of land in business use over the next decade and the Council's view on the extent of this is set out in broad distributional terms in the PECs to the reasoned justification. Notwithstanding the SEP Panel's recommended sub-regional policy WCBV4, I find the general content of the PECs sound and appropriate for inclusion in the CS in summarised form in order to provide a strategic indication of the scale of change that the SADPD should explore. I am not convinced that the CS should attempt at this point to hold onto all existing employment land in Wycombe. The SEP Panel recommendations will require more sub-regional work to establish an appropriate balance on this matter.
- 3.81 Finally, the Atkins study recommends that a monitoring system be put in place to track changes in business land. The Panel's recommendations are likely to require authorities in the sub-region to undertake joint consideration of some of the factors discussed in the study. However, some greater specification and clarification of the indicators is required under test viii as set out below.
- 3.82 **Recommendation 9** The following changes are required to make the CS sound:

Policy 14:

Part 1(b)(i): delete "...in accordance with policy 13."

Part 1(b)(ii): change first sentence as follows - "Considering supplementing existing commitments for business development by identifying a limited amount of land on new sites at High Wycombe in order to achieve qualitative gains in the overall stock."

Part 1 (last paragraph): reword as follows – "Provision of new sites for business development will need to adopt a plan-monitor-manage approach."

Indicators: change as follows-

(first and second bullets): combine thus – "Annual gross/net change in different business uses, by location, by former use class and by the typologies set out in policy 14"

(third bullet) change thus – "Net changes in employment and economic structure by key job sectors"

Reasoned justification:

(below para 4.73): add new paragraph as follows - "Land for business of various types currently extends to around 325ha District-wide. Over 60% is in the urban area of High Wycombe, 10% in Marlow, 5% in Princes Risborough, and around 20% elsewhere in the District, including significant amounts in the Bourne End/Wooburn Town area and on a number of major developed sites in the countryside/Green Belt."

(para 4.74): first sentence: delete "The forecast emerging imbalance between jobs and labour supply (see appendix 3 for details, and"

(para 4.74): third sentence: substitute "at" for "within" and delete reference to "(ie tier 1 of the sequential approach in policy 3)"

(below para 4.74): - add new paragraph as follows - "Site specific work on the review of business land, focusing on quality and locational factors, including marketing considerations, suggests scope for a net loss of around 20ha in the next 10 years or so, broadly distributed 10-12 ha in High Wycombe and adjoining settlements, 3-5ha in Princes Risborough and 4-6ha in the remainder of the District, excluding Marlow where there is only very limited scope. This broadly reflects the distribution of land for business across the District and, more importantly, takes account of the quality of business land in the different locations. However, actual changes will be set out in the Site Allocations DPD."

3.83 *Issue 10 – Does the CS provide clear and appropriate core strategic policy and guidance on housing, including affordable housing?*

3.84 General introduction The CS deals with housing provision mainly at policy 15, as part of "meeting community needs in the right places", and policy 24 (affordable housing) as part of "how it should happen". It is unclear what benefit is gained by this

separation and in terms of coherence and user-friendliness these policies should be successive.

- 3.85 Dealing first with policy 15, the Council's PECs/FPECs put forward a substantial amount of post-submission change aimed at addressing various soundness issues. In particular, the new text seeks to clarify the trigger mechanism for identifying and bringing forward additional land for development (especially greenfield sites, if required) and inserts updated, more detailed coverage of the components of housing land supply into the reasoned justification.
- 3.86 Some aspects of the PECs/FPECs move the CS closer to soundness. For instance, the submitted CS (thorough policies 2-4 & 15) tends to convey the message that development of safeguarded land will be postponed for as long as possible and could not occur until completion of a formal review through a future DPD. The PECs/FPECs began to move away from that over-rigid view and, at the hearings, the Council adopted a more flexible expression of the way in which "safeguarded land" should be regarded, as discussed under issue 6 above. However, to achieve soundness under tests iv and vii the CS should state simply and directly how the requirements of PPS3 and the emerging SEP will be met, including a clear indication of the circumstances in which action will be taken to increase the housing land supply necessary to achieve the trajectory if monitoring were to indicate a developing shortfall.
- 3.87 This can be achieved by appropriate updating and replacement of relevant parts of the policy and its reasoned justification without including the lengthy text of the PECs & FPECs, much of which is incompatible with PPS3 and the SEP, as further explained below. I also consider that policy 4 (Plan, Monitor, Manage, Phasing) needs to be deleted under test vii as this is essentially a process rather than a policy. Coherence and appropriateness would be achieved by briefly referring to the main elements of the process within the most relevant policies (12 in respect of retail, 14 in relation to employment land, and 15 in the case of housing).
- 3.88 The required housing provision The strategy is based on the housing requirements of the draft SEP. However, there was general agreement with the proposition that the increased provision recommended to the Secretary of State by the SEP Panel provides a clear 'direction of travel' and is now the appropriate starting point for the CS. The Panel's recommended provision is 7800 dwellings (390pa) in the period 2006-2026, distributed 7000 (350pa) to the District's share of the Western Corridor/Blackwater Valley sub-region and 800 (40pa) to the "rest of the District". Flexibility needs to be retained to review housing requirements after the Secretary of State finally adopts the SEP but recent regional projections indicate continuing increases in household accommodation needs.
- 3.89 Turning to the issue of whether the CS should also provide for making up the "backlog" of 250 dwellings that occurred in 2001-06

against the former Structure Plan requirement, I note that the SEP Panel's report considers this mainly in the context of affordable housing and found it hard to reach very firm conclusions on the matter. However, it seems to me logical that if a minimum land supply target is not met in one planning period it should be taken forward to the next unless there is good reason not to do so. I do not agree with the Council's position that because the Structure Plan requirement was partly back-loaded in Local Plan policy H4, any such addition (if made) should not exceed 150. The total 20-year CS requirement therefore becomes 8050, split pro rata between the two parts of the District, with minor adjustments to give rounded figures. I generally agree that this shortfall should be made up in the earlier part of the CS period. However, since the high number of completions in 2006 fell not far short of doing so in the first year there is no material advantage in making the presentation of the CS more complex by splitting the requirements into different figures for the first and second 10 year periods.

- 3.90 Adequacy of the housing land supply The Council's update paper of September 2007 provides substantial analysis of the housing land supply at 31st March 2007. In terms of a rolling 5-year forward supply as from April 2008, this can best be measured by examining the position over the 7-year period 2006-13. The requirement for that period would be 2818 [402.5 x 7, rounded]. Set against that, the update paper indicates that completions and potential completions by the end of March 2013 would total 3025 [607 completions, 685 under construction, 313 large planning permissions, 678 Local Plan allocations without planning permission (excluding Portlands) and 742 "other identified sites"]. This constitutes an adequate 5-year supply without the need to anticipate any completions on "UCS new sites" identified in the Preferred Options SADPD. The recent SoS decisions on Terriers Farm and Wellesbourne Campus reached a similar conclusion on the 5-year supply position, albeit using a slightly different statistical basis and approach. The latter decision, adding 238 units to the supply, will have further improved the position, although I will not add this site to my recommended change to the supporting text of the CS (based largely on the position at the end of March 2007, as set out in the update paper) as I consider it generally inappropriate to include piecemeal updating of the base-date circumstances.
- 3.91 Turning to longer-term supply, WDC supplemented the update paper with a statement looking at (a) the 10-year supply situation to 2018 and (b) a 20-year perspective 2006-2026. A joint written response was made on behalf of house-builders. A 10-year supply from the date of adoption of the CS can be measured in terms of the 12-year period (2006-18), allowing for the 607 completions in 2006-07. This equates to a requirement of 4223 [(12 x 402.5) – 607 = 4223].
- 3.92 Sites contributing to this residual requirement of 4223 are listed in the update paper at p91 onwards, making discounts for certain

categories of site. However, in my view it is more appropriate to focus on the non-discounted figures as the evidence for the various chosen discount rates is not particularly convincing. On the other hand, any clearly unreliable elements of land supply should be excluded from the base data in the first place. Thereafter, emphasis can shift to tracking the progress of individual identified sites through the Annual Monitoring Report.

- 3.93 On this basis firmly identified sites are as follows: -
- | | |
|---|-----|
| "UCS sites under construction" (p91) | 685 |
| "UCS sites with permission not started" (p92) | 331 |
| "Other identified sites" (p93) | 742 |
- Apart from the discount issue discussed above, it was not materially questioned that these sites can be developed by 2018.
- 3.94 Turning to the outstanding Local Plan Allocations (p92), it was generally agreed that with one exception these could be delivered by 2018. I accept that, in the case of the retailer-owned Portlands site, a contribution of 70 cannot be reliably assumed. Consequently the number in this category would reduce from 812 to 742. The total yield from all four categories would therefore be 2500 [685+331+742+742], leaving a balance of 1723 [4223-2500] requiring identification through the SADPD to satisfy the 10-year requirement identified above.
- 3.95 The submitted CS (like the relevant PEC) assumes a significant contribution from windfalls. Although the housing update paper assumes no windfall completions within the first 5 years it still expects about 667 from that source in 2007-17 and a further 2880 in 2017-26. These conclusions are based on the findings of the update paper that a stronger yield of windfalls has emerged in the form of a wide range of brownfield sites (including many relatively small ones) since the advent of PPG3 in 2000, which placed added emphasis on making fuller use of urban brownfield land. I have no doubt that continuing "churn" in a mature urban area like High Wycombe will continue to throw up unforeseeable windfall gains. Nevertheless, in order to achieve greater certainty in planning and delivering housing, PPS3 advises that allowances for windfalls should not be included in the first 10 years of land supply unless robust evidence can be provided of genuine local circumstances that prevent specific sites being identified.
- 3.96 Compared with the Local Plan, which directed effort mainly towards identifying larger sites, the Preferred Options SADPD (issued for consultation in February 2007) clearly seeks to be more proactive in identifying and allocating future housing sites. However, in my view Wycombe's position in relation to windfalls is not particularly unusual. Indeed, compared with some areas subject to similar constraints (AONB and Green Belt) it still has areas of land that have long been reserved for future development, as discussed under issue 6 above. In view of the opportunities for identifying specific sites (as considered below) I do not support reliance on

windfalls as a contributory element of the rolling 10-year provision. The PPS3 approach is to regard windfalls as unplanned bonuses to be tracked retrospectively through the monitoring system. To the extent that they occur, they will reduce the need to identify further allocations in the future. This approach could (if market conditions are favourable to the land supply being taken up) produce a significant boost in housing delivery in the immediate 10-year period, an outcome consistent with the SEP Panel's view that District housing provision figures are not "ceilings".

- 3.97 Returning to the scope for the SADPD to identify the balance of 1723 referred to above, the DPD can potentially draw on two types of land – urban redevelopment sites (mainly brownfield) and urban fringe sites selected from the areas of safeguarded greenfield land excluded from the green belt. Taking the urban redevelopment sites first, the 31 "UCS new sites - category 1" on p92/3 of the update paper are listed as having a potential total of 955 dwellings. I understand that all but the final three of these sites are included in the Preferred Options SADPD. From what I heard at the hearings the composition of this list is likely to undergo material change as the circumstances of individual sites evolve and the DPD is submitted to further consultation and testing before its submission and eventual adoption. Among many other factors, developers' representatives expressed concerns about the assumed production of housing on certain sites (such as the Sports Centre) and the high proportion of existing employment sites within this category.
- 3.98 Appendix 4 of the update paper lists a second batch of possible brownfield sites under the heading "Other UCS new identified sites – category 2". The largest of these is the former RAF site at Daws Hill, with a notional residential capacity of about 500. On the basis of recent information, and even allowing for doubt arising from the delays that can occur in the development of former MOD land, there seems to be a good chance that this site will have been developed by 2018.
- 3.99 The balance of land in this category (333 dwellings) mainly consists of a number of sites identified in the Preferred Options SADPD as capable of producing residential development as a component of mixed-use schemes, mostly in and around the town centre. The Council places no reliance on any of these as firm contributors to the 10-year supply and accepts that their delivery is less certain. Some appear long-shots unless a greater degree of intervention in land assembly is undertaken. However, at some stage the Council may have to take such action, especially if opportunities for maximising residential use in the town centre are to be seized and the need for breaking out beyond the current reserve locations avoided. I therefore support inclusion in the reasoned justification of some of the references from the FPEC regarding management of housing provision, as these are necessary to meet test viii with regard to mechanisms for implementation.

- 3.100 Turning to greenfield opportunities, the SADPD can also draw upon the safeguarded land (or 'reserve locations') listed in CS policy 10. As discussed under issue 6 above, these sites (including Gomm Valley) would have a notional capacity in the range 1550-1750 (mid-point 1650) if they were to be used entirely for residential development.
- 3.101 The maximum total capacity of the identified urban and greenfield sites discussed in the above three paragraphs amounts to 3438 [955 + 833 + 1650]. It is not within my remit (and in any case it is premature) to consider the soundness of all the SADPD sites in detail. However, it is likely that (a) densities on some sites will change, usually increasing their overall dwelling yield, (b) other sites may, in the end, fail to be allocated, and (c) that still other sites may emerge for inclusion in the final SADPD.
- 3.102 Nonetheless, a notional yield of 3438 from the current list of candidate sites comfortably exceeds the required balance of 1723 necessary to secure an identified 10-year supply. This gives confidence that when the CS is adopted the SADPD will be in a position to complete the LDF's task of identifying a developable land supply for more than 10 years beyond its adoption date without reliance on windfalls. Depending upon the outcome of monitoring over the years ahead it is feasible that some further land may need to be identified to complete a developable supply to the end of the current time horizon of the CS, 2026. In that case (and if all current reserve locations were fully developed) it may then become necessary to undertake a fundamental re-appraisal of other growth options. Consideration of such matters would require significant review of the CS and SADPD.
- 3.103 Referring briefly to the PECs to the reasoned justification concerning housing distribution, it follows from the discussion above that I do not support inclusion of proposed table 4.3 and figure 4.3a because the detail of both relies so heavily on windfalls. In my view it is adequate, and more appropriate, to add a single paragraph to the reasoned justification explaining the expected geographical distribution of new housing in very general terms, including the minimum figure for Princes Risborough resulting from recommendation 4 above.
- 3.104 Affordable housing Policy 24 is generally sound, including the use of the "bedspace" measure, which has been included in at least the last two local plans and was supported by the Local Plan Inspector. In my view bedspaces are a fair, proportionate and flexible measure with some advantages in terms of securing an appropriate housing mix and addressing priority needs. However, if these are the measure, soundness (test viii) will require monitoring of affordable bedspaces as a proportion of all such completions, albeit that Government statistical returns are based on dwellings.

- 3.105 Turning to part 2(d) of policy 24, the study by Savills provides a very general theoretical basis for seeking a higher percentage of affordable housing (40%) where this is built on greenfield land and ex-employment sites as compared with other brownfield land. I therefore support the proposition that this should be the Council's starting position on such sites. However, it will not be universally true that developments on such land can support this higher level of provision and it must be made clear in policy terms that the caveats about (a) individual circumstances and (b) the potential for different thresholds to be set for particular sites in Site Allocations DPDs (depending on site characteristics) apply across the board to all sites, whether in the 30% or 40% categories. Some re-ordering and re-phrasing of the policy is necessary to achieve clarity and soundness on these matters. Even with these changes the policy is still quite complex, and it may be difficult and time-consuming for the Council to operate and for developers to understand in advance. This matter will need to be kept under review.
- 3.106 My revision of policy 24 takes account of the accepted point that the first bullet of part 2(a) is not intended to apply "across the District" but only at High Wycombe Urban Area, Marlow and Princes Risborough. It also deletes part 3, as proposed by the Council in a PEC. I agree that the latter is an inappropriate requirement and do not support the claim (in paragraph 5.22 of the submitted CS) that there is a 'strong case' for it. Rather, that paragraph should be deleted.
- 3.107 As for the other PECs put forward by the Council, I agree that the indicators need slight revision to bring compliance with test viii, that it is appropriate to update the reasoned justification to indicate the latest updated quantification of need and the areas where this is concentrated, to update references to Government advice in PPS3 and to clarify the reference to the viability research. As for the reference to "sui generis business uses", I find this inappropriate as a use either is, or is not, a "business use". The phrase "sui generis employment-generating use" seems to me the nearest equivalent to what the Council is seeking to encapsulate.
- 3.108 **Recommendation 10** The following changes are required to make the CS sound:

Policy 4: delete

Policy 15: change as follows:

"Provision of land will be made to meet the following housing requirement in the period 2006-26:

7800 (390pa) [recommendations of the South East Plan Panel]*

250 (12.5pa) [to make up an inherited shortfall from 2001-06]

8050 (402.5pa) [total requirement]

*[*If the Secretary of State were to include a different housing requirement in the final adopted form of the South East Plan it is conceivable that a review of the Core Strategy could be required]*

The above total requirement will be distributed 7240 (362pa) to the Wycombe portion of the Western Corridor/Blackwater Valley sub-region and 810 (40.5pa) to the remaining part of the District.

The Site Allocations DPD will identify and allocate sufficient land to ensure that there is a supply of deliverable sites in years 1-5 and developable sites within years 6-10, in both cases without reliance on windfalls. It will also (as far as compatible with the approach set out in this Core Strategy) identify sites for development within years 11-15.

In making this provision it will be essential to ensure that the necessary infrastructure and services have sufficient capacity to accommodate the development, or that adequate capacity will be provided in a timely way.

A "plan, monitor, manage, phase" approach will be adopted based upon the key tool of the Annual Monitoring Report, through which progress in housing delivery and the continuous maintenance of a 5-year rolling land supply will be tracked.

The Council will bring forward actions to increase the supply of deliverable housing land if it appears at any time that housing completions have fallen more than 15% below the trajectory rate and review of the deliverability of planned sites indicates that the housing trajectory is otherwise unlikely to be recovered over the next 5 years."

Indicator: replace the 3 bullets with two as follows -

"(1) annual progress against the target of 402.5 net additional dwellings pa in the District, split 90% to that part of Wycombe in the Western Corridor and Blackwater Valley sub-region and 10% to that part outside it.

(2) annual progress in retaining a deliverable supply of housing land in years 1-5 and a developable supply in years 6-10 and 11-15."

Delivery: (second bullet) change as follows – "through careful annual monitoring of the housing trajectory and the plan-monitor-manage-phase approach"

Reasoned justification: change as follows –

"The housing provision in policy 15 reflects the recommendations in the report of the Panel which examined the draft South East Plan. These figures could be subject to change in the final version of the Plan adopted by the Secretary of State. To this is added an

allowance of 250 dwellings to make up a shortfall of completions in 2001-2006 against the former Structure Plan rate.

An adequate supply of deliverable housing land has been identified for the 5-year period to 2012/13, in accordance with the requirements of PPS3.

The box below sets out a position statement indicating how the District's housing land requirements will be met for the longer-term periods 2006-18 and 2006-26. This is mainly based on the position at the end of March 2007. 607 completions took place in the first year and developable sites for another 2500 dwellings have been identified and can be completed by 2018. Therefore, a minimum balance of 1723 dwellings remains to be firmly identified through the Site Allocations DPD to secure a 10-year supply (measured as the 12 years 2006-18). That DPD will test the sustainability/developability merits of the various candidate options as follows: – about 1788 potential dwellings on previously developed brownfield land and some 1550-1750 potential dwellings on greenfield land at the reserve locations (see policy 10).

Over the longer-term, towards the end of the 20-year CS period (to 2026), there is a present deficit of about 3.7 years (about 1500 dwellings) against the total of the current identified supply and the sum of the options currently known to be available for testing in the Site Allocations DPD. As annual monitoring proceeds, and as the RSS is rolled-forward, it will become clearer whether and when the CS will need future review to set new guidelines for identifying land to meet needs nearer to 2026 and beyond.

Box: Position statement on housing provision

(A) 10-YEAR REQUIREMENT to 2018

ie 12 years from CS commencement (2006)

SEP panel recommended rate 390pa x 12	4680
Plus 12-year share of backlog from 2001-2006	150
Minus completions 2006-2007	- 607
<u>Outstanding total requirement to 2018</u>	<u>4223</u>

CURRENTLY IDENTIFIED DEVELOPABLE SUPPLY

Under construction at 31.03.07	685
Planning permissions at 31.03.07	331
Other identified sites at 31.03.07	742
(Developable) Local Plan allocations at 31.03.07	742
<u>Total currently identified developable supply</u>	<u>2500</u>

BALANCE OF SUPPLY TO BE IDENTIFIED

<u>THROUGH THE SADPD [4223 – 2500]</u>	<u>1723</u>
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POTENTIAL SUPPLY TO MEET THIS BALANCE,

TO BE TESTED THROUGH THE SADPD (not in priority order)

Urban capacity sites (category 1)	955
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in SADPD preferred options

<i>Urban capacity sites (category 2), inclu 500 at Dawes Hill</i>	<i>833</i>
<i>in SADPD preferred options</i>	
<i>Potential at identified greenfield reserve locations</i>	<i>1650</i>
<i>(mid-point of notional range 1550-1750)</i>	
<i><u>Total potential supply to be tested through the SADPD</u></i>	<i><u>3438</u></i>

(B) 20-YEAR REQUIREMENT 2006-26

<i>SEP panel recommended rate [390pa x 20]</i>	<i>7800</i>
<i>Plus backlog from 2001-2006 [12.5pa x 20]</i>	<i>250</i>
<i><u>Total requirement to 2026</u></i>	<i><u>8050</u></i>

20-YEAR SUPPLY 2006-26

<i>(a) Completions 2006-07</i>	<i>607</i>
<i>(b) Total currently identified developable supply</i>	<i>2500</i>
<i>(c) Total potential supply to be tested in SADPD</i>	<i>3438</i>
<i>Total (a) + (b) + (c)</i>	<i><u>6545</u></i>

Indicative longer-term balance towards the end of the CS period to be secured through retrospective monitoring of windfalls and/or a future SADPD review [8050 – 6545]

1505

The housing trajectory set out in Appendix 3 illustrates the figures in the box above. However, this is based upon a snapshot in time. The Council is required to demonstrate a continuous existence of a rolling 5-year supply of deliverable housing land. The latest position will always be set out in the most recent Annual Monitoring Report. This will track the progress of housing completions against the provision in policy 15 above and make annual reassessments about the adequacy of the supply of deliverable and developable housing land.

The Council will use the annual monitoring process (informed by Strategic Housing Market Assessments and Strategic Housing Land Availability Assessments) to manage land supply. Appropriate action will be triggered to increase supply if monitoring reveals that housing completions have fallen more than 15% below the rate set out in the trajectory and review of the deliverability of planned sites indicates that the trajectory is unlikely to be recovered over the next 5 years without action being taken. Such actions may include holding discussions with developers and landowners to identify barriers to delivery, use of the Council's land acquisition powers (where appropriate in order to bring forward constrained sites), advancing sites in the development programme, granting planning permission, or identifying the need to undertake a timely review/preparation of an appropriate DPD. Priority will normally be given to actions that improve the delivery of housing on previously developed land, but not at the expense of securing the necessary range of deliverable and developable sites.

In accordance with national advice in PPS3, the strategy makes no allowance for "windfall" sites to contribute towards the required supply of developable land during the first 10 years from adoption of the LDF. [Windfalls are sites which emerge through the development control process without previous identification in a DPD.] However, to the extent that windfalls occur they will be picked up retrospectively through the monitoring system and would reduce the need for identification of further allocations after 2018.

The new homes provided to 2026 will be concentrated primarily in and around the High Wycombe Urban Area, with smaller numbers in Princes Risborough (about 480) and Marlow. The balance will be made up mainly through small developments and infilling at the other settlements in the District."

Policy 24: *relocate so that it directly follows policy 15*

(parts 2(a) – 2(c)): change as follows-

"2(a) The Council will seek to secure affordable housing on sites of 15 or more dwellings (or of minimum size 0.5ha) at High Wycombe Urban Area, Marlow and Princes Risborough, or (in the rest of the District) of 5 or more dwellings (or of minimum size 0.16ha). Subject in every case to the physical circumstances of the site and prevailing and anticipated market conditions, the Council will seek to ensure that at least 30% of the total bedspaces within a development are within affordable dwellings, unless the site is greenfield land or was last used for business use or a similar sui generis employment-generating use, in which case the Council will aim to achieve at least 40% of total bedspaces within affordable dwellings.

(2b) Where sites are allocated in a Site Allocations Development Plan Document, that document may specify a different housing target, having regard to the site specific circumstances referred to above.

2(c) Where a site proposed for housing development falls below the above size thresholds but is demonstrably part of a potentially larger developable area above those thresholds, the Council will seek to achieve affordable housing on a pro rata basis.

(part 3): delete

Indicators:

(first bullet): add at end "(in terms of dwellings and bedspaces)"

(second bullet): change to - "New-build affordable dwellings & bedspaces (in terms of their annual proportion of all new-build dwellings & bedspaces) Target for 2006-11 23% of all dwellings; target for 2011-26 27% of all dwellings."

Reasoned justification:

(para 5.13): change second sentence as follows – "The last full housing needs survey [Wycombe Needs Survey, Fordham Associates, 2003] showed a need for 1,248 affordable dwellings pa in the period 2003-08. A recent update [Wycombe Housing Needs

Survey Update 2006, Fordham Associates, August 2006] shows a similar level of need – 1,236pa for 2006-11”.

(para 5.13): third sentence: delete “see appendix 3”

fifth sentence: change as follows – “The highest overall need is in the main urban areas, especially in the High Wycombe area where over three-quarters of the total need is concentrated, as is a similar proportion of the expected supply over the next 10 years. However, significant need also exists in the rural areas (16% of total need). Around 5% is in Marlow and 4% in Princes Risborough.” [then continue as in the submitted CS]

(para 5.16): change as follows – “The site size threshold for seeking affordable housing in urban areas accords with the national indicative minimum threshold set in Government policy in PPS3, while the lower threshold for rural areas is what is considered appropriate for Wycombe in the light of the guidance in PPS3, the extent of need and the limited supply of generally small sites in rural areas.

(para 5.18): change third and fourth sentences as follows – “In addition, the study suggests that in broad terms the size of site is not necessarily critical to viability; this assessment included testing down to sites for 5 dwellings. It is recognised that there are factors that can affect viability either way.”

(para 5.20): change the reference to “.....business use (ie employment land)....” to “.....business use or a similar sui generis employment-generating use....”

(para 5.22): delete

(add new paragraph): “PPS3 also allows for affordable housing to be provided through the use of “rural exceptions site policy” under which sites to be developed solely for affordable housing can be brought forward to serve the needs of small rural communities, using land on small sites that would not normally be used for housing because of restraint policies. While such sites can be allocated in other local development documents it is likely that most will come forward through the development control process with the support of the local community and partner registered social landlords. More detailed guidance will be provided in the detailed Development Control Development Plan Document.”

3.109 Issue 11 – Does the CS provide clear and appropriate core strategic policy and guidance on residential exceptions, and gypsies/travellers/travelling showpeople?

3.110 Part (1) of policy 16 adds nothing locally distinctive to national advice in PPS3 on rural exceptions sites. It is therefore unsound under test vii and I delete it, although at Recommendation 10 I insert brief reference to this means of provision in the reasoned justification to policy 24. Similarly, part (2) merely gives a very brief summary of the content of PPS7 in relation to agricultural dwellings and I delete it for the same reason.

3.111 Part (3) covers accommodation for gypsies, travellers and travelling showmen. In its submitted form it, too, adds nothing locally distinctive to the content of the South East Plan, PPS3 or Circulars 01/06 and 04/07. However, Circular 01/06 deems these topics to be of significance for core strategies and advises that they should set out criteria for such sites to guide allocations in other DPDs. For that reason I recommend that policy 16 be re-titled and its scope reduced to cover only this topic. The PECs to part (3) appropriately address issues of soundness related to consistency with national and regional policy (test iv) and alter the reasoned justification to introduce a local dimension. I therefore recommend changes in those terms.

3.112 **Recommendation 11** The following changes are required to make the CS sound:

Policy 16:

Title: change to "Gypsies, travellers and travelling showpeople"

Introduction and parts 1 and 2: delete

Part 3: change the policy to include the gist of the PECs as follows-

"Where the South East Plan identifies a requirement for additional accommodation for gypsies and travellers or travelling showpeople (or there is proven local need arising in the District), planning permission may be granted, or site allocations proposed, for a rural exceptions site when all of the following criteria can be met;

(a) [retain unchanged]

(b) The accommodation proposed is to meet the needs of those people with an existing significant and long standing family, educational or employment connection to that area.

(c) and (d) [retain unchanged]"

Indicator:

Insert "and" between "gypsies" and "travellers"

Reasoned justification:

(1st to 3rd unnumbered paragraphs): delete

(4th unnumbered paragraph): change title to "Gypsies and travellers, and travelling showpeople"

(5th unnumbered paragraph): first sentence - delete "in accordance with policy 3 (sequential approach)"

(6th unnumbered paragraph): change as follows -

"Government policy emphasises the importance of assessing the accommodation needs of gypsies and travellers. The Council has with other authorities in the ACTVaR2 [Association of Thames Valley Authorities] area, undertaken a joint gypsy and travellers needs assessment. The report shows that across the ACTVaR sub-region consisting of 18 local authorities in Berkshire, Buckinghamshire and Oxfordshire, there was a need for 187 additional pitches for permanent gypsies and travellers accommodation in the period 2006 – 11. Of this, the need for a total of 8 pitches originated within Wycombe District."

(7th unnumbered paragraph): change as follows- "Government policy indicates that Regional Spatial Strategies should specify pitch numbers for each local planning authority area. At present the submitted South East Plan (March 2006) does not include any such provisions. However the South East England Regional Assembly has committed to undertaking an early partial review of the South East Plan to specifically address the issue of gypsies and travellers, including the distribution of pitches to individual districts. This is due to be submitted to the Government in summer 2008 and whilst there is no timetable for adoption this is likely to be in 2009. The ACTVaR needs assessment together with other needs assessments around the region will provide important evidence. In addition the Council, along with other local authorities in Buckinghamshire, intend to undertake an assessment of the need for accommodation for travelling showpeople. This is likely to be completed during 2007. The outcome of needs assessments and the partial review of the South East Plan will help to inform the consideration of any future site allocations."

(8th unnumbered paragraph of the PECs version of the CS): insert "other Local Development Documents including" after ".....or will be addressed in"

3.113 Issue 12 - Does the CS provide clear and appropriate core strategic policy and guidance on community facilities?

3.114 Although WDC suggests a cross-reference to policy 13 in part 1 of CS policy 17, I have recommended deletion of the former policy. The Council also puts forward a PEC to part 2 but (as indicated in my recommendation) further change is needed to make the policy sound in terms of test vii. I agree that clarity requires additions to the box in order to identify all the uses which the Council chooses to regard as "community facilities" for the purposes of policy 17.

3.115 The reasoned justification needs change to omit reference to deleted appendix 3 and, in compensation, introduce relevant references from it (ie replacing the sports centre and resolving issues concerning Adams Park).

3.116 **Recommendation 12** The following changes are required to make the CS sound:

Policy 17:

(part 2) change as follows – "Unless it can be demonstrated that there is no community need for the facility the Council will resist (a) the loss or change of use of buildings with an existing planning use as a community/built sports facility and (b) the development for other purposes of land allocated for such facilities. Where it would be of community benefit for such facilities to be provided in another form this should take place either on-site or on another site offering no less overall community benefit. In appropriate circumstances a proportionate contribution to an off-site solution may be sought."

Box:

*(first bullet) - add "and village halls" after "youth centres"
(other bullets) – add additional bullets thus – "post offices: local shops within both urban and rural areas: indoor and outdoor sports facilities"*

Reasoned justification:

(second paragraph): replace first sentence as follows – "Key issues that need to be addressed are replacing the sports centre and its outdoor facilities and resolving issues relating to Adams Park, home of Wycombe Wanderers & London Wasps."

3.117 Issue 13 – Does the CS provide clear and appropriate core strategic policy and guidance on transport issues?

3.118 CS coverage of transport issues is dispersed between policies 18 (transport), 22 (transport and infrastructure), 23 (contributions of development to community infrastructure), parts of appendix 3, and appendix 4 (transport actions and shared vision for High Wycombe). Policy 6 also covers transport issues affecting the town centre and the M40 Gateway. This scattered presentation impedes comprehension of the transport-related aspects of the CS and the Council accepted that greater cohesion and integration of the transport aspects would be desirable in the interests of clarity and user-friendliness. However, that aim cannot be secured at this stage in the process and will need to be pursued at the first review.

3.119 Although fragmented, the transport content of the CS is generally sound, apart from policy 6(1), which I have discussed under issue 3 above. Otherwise, only relatively small changes are required to secure compliance with test vii. Dealing first with policy 18 and its reasoned justification, I support inclusion of the gist of the Council's PECs with regard to transport assessments, but in broadened form to include assessment of impacts on all aspects of the transport network, not just roads.

3.120 I also support those aspects of the PECs deleting the reference to the regional "transport" hub to bring compliance with the SEP and correcting the reference to Handy Cross in the penultimate paragraph. However, soundness issues do not necessitate the other PEC changes. With regard to part 2(c), it follows from my recommendation 3 that this should be deleted.

3.121 Turning to policy 22, this has no particular Wycombe focus and is something of an omnibus development control type policy. Its infrastructure aspects also partly overlap with policy 23. However, it is not unsound other than the need to introduce some points of clarification. I therefore support the gist of the PECs, although

reference to the cumulative impacts of smaller developments can be adequately left to the reasoned justification.

3.122 I discuss appendix 3 under issue 18, and my recommendations are set out there. Finally, appendix 4 provides a sound general statement of the transport vision for the District, although a number of things (such as the place of park-and-ride in the future strategy for High Wycombe and the "linear public transport hub" across the town centre) are as yet little defined and will require considerably more subsequent policy development.

3.123 **Recommendation 13** The following changes are required to make the CS sound:

Policy 18:

(part 2): insert "the Highways Agency" after "County Council" in the introduction, and delete part 2(c)

(remainder of policy): insert new part 3 as follows "Development proposals must be assessed for their impact on all aspects of the transport system, including public transport and the trunk and local road networks. Provision for any necessary improvements or mitigation measures must be secured prior to first occupation of the development. Such measures should be consistent with and support the delivery of transport strategies and priorities set out in the Local Transport Plan."

Reasoned justification:

(4th paragraph): add after first sentence "This means that full transport assessments of new developments will be required."

(5th paragraph): delete "transport" in the second sentence

(penultimate paragraph): change final bullet point "maximum benefit for the operation of the Handy Cross junction and local accessibility."

Policy 22:

(part 8): change as follows – "ensure that developments will be served by adequate infrastructure capacity in terms of water supply, foul drainage, wastewater and sewage treatment, and other utilities, without leading to problems for existing users."

Reasoned justification:

(final paragraph): add as follows: "In doing this, and in planning for infrastructure needs, account will be taken of the cumulative impact of the many smaller-scale developments as well as the individual effects of larger-scale developments."

3.124 ***Issue 14 – Does the CS provide clear and appropriate core strategic policy and guidance on environmental assets?***

3.125 WDC recognises that policy 19 lacks coherence as its various parts do not knit together clearly or provide an adequate locally-based framework which properly identifies (and differentiates between) some of the major necessary themes. Following discussion of concerns raised by myself and others at the relevant hearing session, WDC (with relevant stakeholders) has suggested changes

to overcome these defects. These (a) separate open space issues from the wider green infrastructure issues given more prominence in the SEP and at county level, (b) rightly place more emphasis on the need to identify and work with the whole grain of the landscape under a "landscape character" approach, as opposed to cherry-picking a few localised areas of sub-AONB "quality", (c) widen the scope of features recognised under the heading of historic environments, and (d) appropriately amplify the reference to watercourses. These changes overcome deficits identified under test vii and I support them, but in shortened form in order to avoid reiterating national policy and prevent too much reference to the Bucks Historic Environment Record from unbalancing the CS.

3.126 The suggested changes also include consequent additions to the bullet points on "Indicators" and "Delivery". I support the gist of some of these as being necessary to ensure compliance with test viii. However, in the case of the indicators I do so only to the extent that they are expressed neutrally, without straying into the terminology of objectives. I do not support bullet two as this can be regarded as an element of bullet one.

3.127 **Recommendation 14** The following changes are required to make the CS sound:

Policy 19: *Replace from part 2 onwards as follows:*

2. the implementation of the objectives of national and local biodiversity action plans through measures including conserving and enhancing biodiversity in terms of species and habitat, protecting international, national and locally designated sites of importance for biodiversity, and creating opportunities to link wildlife habitats

3. the protection of open spaces and action to address deficiency in open space

4. the identification, retention and enhancement of green infrastructure assets, including the development of green corridors and networks as envisaged in the South East Plan and other relevant strategies including the forthcoming Bucks County Council Green Infrastructure Strategy.

5. the conservation and enhancement of landscape character, with reference to national and county-level landscape character assessments and, where appropriate, landscape character defined in more detail at local level.

6. the preservation or enhancement of historic environments (and, where appropriate, their settings) through the identification, protection and/or appropriate management of archaeological remains, historic buildings and registered landscapes of national and local importance (see also policy 21)

7. the conservation and enhancement of watercourses, water bodies and their settings for their landscape character, biodiversity and recreational value – especially the River Thames and its valley corridor and the District's chalk streams.

8. *the prevention of inappropriate sub-division of agricultural land to avoid degradation of land of amenity value."*

Indicators: *add to/revise indicators as follows*

"- changes in areas and populations of biodiversity importance, including: (i) change in priority habitats and species (by type); and (ii) changes in areas designated for their intrinsic environmental value including sites of international, national and local importance
- net gains/losses in green space designations
- net gains/losses of designated heritage assets considered at risk
- percentage of conservation area appraisals updated in the last 5 years"

Delivery: *add to/revise delivery bullet points as follows*

- (retain first bullet unchanged)
- "through recording international, national, and local nature conservation designations in development plan documents
- through support for Bucks Milton Keynes Biodiversity Partnership, including the protection and enhancement of Biodiversity Opportunity Areas defined in future development plan documents
- through the preparation of biodiversity guidance
- through use of tools and techniques including (a) conservation area appraisals and management plans and (b) landscape character assessments (including use of historic characterisation) to help decision makers to recognise, conserve and reinforce local landscape distinctiveness
- through development of strategies for protecting and, where possible, linking green infrastructure assets
- (retain bullets 4-6 unchanged)
- through use of the Bucks Historic Environment Record, its supporting historic landscape and town characterisation studies, and its planning advisory service
- through joint working with other local authorities on a co-ordinated policy framework for the Thames corridor
- through the Chilterns Chalk Streams Project"

Reasoned justification: *change as follows -*

Para 5.3: add after third sentence – "The River Thames and the District's chalk streams are particularly important environmental and recreational assets, the former being recognised as such in a new policy recommended by the South East Plan panel."

Para 5.3: relocate the second part of the paragraph into new para 5.4, revising the text as follows – "The Council's recent audit of open spaces and green spaces in the main towns and villages highlights the need for qualitative improvements across the District and, in some areas, the need for new open spaces to address deficiencies in terms of quantity and/or accessibility."

Para 5.4: relocate the paragraph into new para 5.5, revising it as follows – "The District possesses a rich heritage of archaeological remains and historic buildings and landscapes. This should be valued and protected as part of our cultural inheritance and identity

as well as a key element in regeneration and place-shaping. The Buckinghamshire Historic Environment Record holds details of over 4000 county-wide historic sites and buildings, only about one-third of which are protected by national and local designations. It also includes the county Historic Landscape Characterisation database. These sources provide a valuable evidence base for identifying locally important heritage assets and contributing to landscape character analyses respectively."

3.128 Issue 15 – Does the CS provide clear and appropriate strategic policy and guidance on waste/natural resources & pollution?

3.129 The PECs suggest changes to policy 20 dealing with soundness defects under test vii. The PEC to part 2 needs extension to include non-fluvial sources of flooding, while that to part 3 brings clarity. In my view the PECs to parts 5 & 6 overstate what these measures will achieve. My further small amendments express them in a form which I understand to be the Council's position, ie to reflect the current extent of Government policy as it affects the powers and responsibilities of LPAs. The PECs to the Delivery section and paras 5.5-5.5b of the reasoned justification follow from the above changes. I have added reference to the Government target of zero-carbon homes by 2016.

3.130 **Recommendation 15** The following changes are required to make the CS sound:

Policy 20: change as follows:

(part 2) "avoid increasing (and where possible reduce) risks of or from flooding, including fluvial flooding, sewer flooding, surface water flooding, and groundwater flooding."

(part 3) "minimise water use during construction and operation including provision of measures to encourage water conservation and recycling, and water efficiency;"

(parts 5 & 6 combined) "contribute towards the goal of reaching zero-carbon developments as soon as possible by (a) including appropriate on-site renewable energy features and (b) minimising energy consumption by measures including the use of appropriate layout and orientation, building form, design and construction, and design to take account of microclimate"

Delivery: change final bullet as follows - *"Through close working with other agencies and utilities including the Environment Agency and water utilities, particularly in relation to pollution control, flooding and water conservation, efficiency and recycling measures"*

Reasoned justification: delete the last two sentences of para 5.5, then add two new paragraphs as follows -

5.5a "As a result of this rapidly changing situation the Council is taking a flexible approach to the provision of on-site renewables"

and other sustainable forms of development dealt with in policy 20. Overall, the Council wants to achieve zero-carbon development as soon as possible. The Government target for new homes is to do so by 2016. The speed of progress towards these aims will be kept under review in future local development documents, having regard to Government and regional policy, developments in technology and science, and the impact on the viability of development. Specific targets will be set out in development plan documents and supplementary planning documents, including the way in which contributions from on-site provision will be assessed.

5.5b Provision of renewable energy facilities in new developments will also contribute towards meeting regional and sub-regional targets for renewable energy. For the Thames Valley and Surrey sub-region the targets are to achieve 140 MW of installed capacity by 2010 and 209 MW by 2016."

3.131 Issue 16 – Does the CS give appropriate encouragement to securing improvements in the quality of design?

3.132 It is arguable whether policy 21 adds anything clearly Wycombe-specific to national guidance on design in PPS1, but the main soundness issue is that its title does not reflect its scope. The policy can be interpreted as applying only to new settlements or major urban quarters, whereas the intention (in line with the Community Plan's aim of creating "good places to live, work and visit") is to improve design at all scales of development. Changes to the title and introduction will rectify this deficiency against tests v & vii. Parts 3&4 of the policy need change to bring coherence.

3.133 It is unnecessary to introduce reference to heritage developments as this issue is already adequately covered at policy 19.

3.134 **Recommendation 16** The following changes are required to make the CS sound:

Policy 21: *change title to - "Raising the quality of place-shaping and design"*

(Introduction): change to - "To secure improvements in the quality of place-shaping and design, the Council will require:...."

(Part 3): Change to - "new buildings to be planned positively to provide flexibility of future use:"

(Part 4): Change to - "appropriate provision to be made for open space..."

3.135 Issue 17 - Does the lack of a final version of the Strategic Flood Risk Assessment (SFRA) render the CS unsound?

3.136 PPS25 (para 6) requires SFRA's to be prepared "as freestanding assessments that contribute to the sustainability appraisal of their plans". Although PPS25 was issued 8 months after submission of

the CS, some high-level flood risk assessment was included in the final sustainability appraisal. This focused on risks affecting the broad areas of change and development identified in the CS and indicated that the corridors of high flood risk in these areas are of limited extent. Slate Meadow (a safeguarded site under policy 10) is partly affected by high flood risk, but that limitation is recognised by WDC and will be a major governing factor on the quantity of any development which the SADPD could identify for allocation here.

3.137 A draft SFRA, effectively confirming the earlier conclusions of the sustainability appraisal, was delivered to WDC in November 2007. The Environment Agency has reservations about some aspects of it, particularly (but not only) about the way that it deals with issues other than fluvial flooding. However, I have heard nothing in principle to lead me to conclude that irresolvable impediments will prevent the completion of a final agreed SFRA soon.

3.138 PPS25 requires SFRA to be available "*to inform the preparation of LDDs*" (para 12) and that the sequential approach will need to be applied "*as part of the identification of land for development in areas at risk of flooding*" (para 15). In my view the work undertaken through the sustainability appraisal and the draft SFRA does not suggest that the broad areas identified in the CS are incapable, in sequential flood risk terms, of delivering what is generally expected of them by way of development capacity.

3.139 It is now important that planning in Wycombe can proceed to preparation of the SADPD. In that context consideration can be given to detailed flood risk issues at site-specific level, informed by the final SFRA. There is no reason to conclude that development options for the SADPD will be so constrained as to cause pressure to develop sites at risk of flood and I therefore conclude that a sound CS is not dependent on final adoption of the SFRA.

3.140 ***Issue 18 – Is Appendix 3 sound in terms of its coherence, consistency and effectiveness?***

3.141 Appendix 3 contains a confusing miscellany of items, including an outdated schedule of the evidence base, a summary of the pre-submission options and consultations, a reference to other key strategies and plans, and various isolated pieces of information on key topics dealt with elsewhere in the CS. Its content and arrangement are incoherent and not user-friendly. Almost all the material either revisits earlier sections of the CS or will be redundant at adoption. Consequently, WDC accept that much of it is appropriate for deletion, while some other parts need relocation to support key sections of the CS.

3.142 I support that outcome, and all the suggested deletions, but also recommend the following additional deletions:

- the sections on "Buckinghamshire Transport Plan", "Government Policy" and "Other Strategies", which is inessential and outdated;
- the section on "Housing", which duplicates material central to the main content of the CS, as recommended for change;
- the section on "The needs of the local economy" and "Balance of jobs and labour supply", because (a) the references to the future labour market are not fully consistent with WDC's statement on matter 10 (para 10.6) and the recommendations of the SEP Panel and (b) the bullet point on skills and training adds little to para 4.72. As for the references to the University and the college, coherent presentation requires their inclusion under policy 5 (see recommendation 3);
- the section on "Town centre uses", because the parts suggested for relocation after para 4.64 merely summarise short-term conclusions from the 2004 study;
- the section on "Transport infrastructure and Utilities", because they add nothing essential to what appears elsewhere in the CS except for the final paragraph of the latter. To secure coherence, that needs to be placed in the reasoned justification to policy 22;
- the section on "What has happened so far?"; it is inappropriate to put this into section 1 of the CS, as WDC suggests. Paragraphs 1.6-1.9 concern earlier consultation phases and are now outdated.

3.143 This only leaves the references to the Local Area Agreement and the SEP. For clarity, these need relocation to section 2 & appendix 5 respectively. As indicated under issues 3 and 12, I recommend that the references to the university and college be moved to policy 5 and the reasoned justification to policy 17 respectively.

3.144 Consequent upon these changes appendix 3 will only contain the housing trajectory. It should therefore be re-titled accordingly and compiled from the material relating to housing land supply set out in the recommended reasoned justification of policy 15.

3.145 **Recommendation 18** The following changes are required to make the CS sound:

Appendix 3: delete all text, except for the following:

(title): change to "Housing Trajectory" and compile the information for this from Recommendation 10 (reasoned justification);

(other material): delete all other text, except for the following -

- first three sentences below the sub-heading "Local Area Agreement for Bucks": relocate after the 1st sentence of the introduction to appendix 5;

- text below the sub-heading "South East Plan": relocate below para 2.5 of the CS under a new sub-heading "Strategic Context";

- final paragraph under "Transport Infrastructure and Utilities": relocate at the end of the reasoned justification to policy 22.

(consequential change): remove the reference to Appendix 3 in paragraph 2.8

4 Overall Conclusion

- 4.1 Subject to the deletion of policy 6(a) and other sections of the CS relating to High Wycombe Town Centre (detailed at recommendation 3) and the making of the other changes set out in the recommendations to this report, I conclude that the Wycombe Core Strategy satisfies the requirements of s20(5) of the 2004 Act and the associated Regulations, is sound in terms of s20(5)(b) of the 2004 Act, and meets the tests of soundness in PPS12.
- 4.2 As a result of my recommended changes the policy and paragraph numbers of the CS will require careful editing. I am content for the Council to undertake this exercise, including the correction of any minor factual or typographical errors that may be picked up.

Roy Foster

INSPECTOR