Following the closure of the Hearings in September 2018, I undertook to write to the Council with any additional questions I may have in relation to the matters that have been considered during the course of the oral sessions. Outlined below are a number of questions for which I would welcome the Council’s response.

Q1. Sustainability Appraisal

Whilst I note the Council’s response to my Matter 1, Question 7, and the comprehensive nature of the evidence base in relation to the Sustainability Appraisal (SA) of the Plan. I am nevertheless of the view that there are a number of aspects of the SA that lack clarity and requires revision. The matters which I consider need to be addressed are:

- The production of a Composite SA document which brings together evidence base documents SA1, SA2, SA3, SA4, SA5, WDLP2, WDLP2.1, WDLP10.19 (where relevant to the SA) and WDL10.22;
- The provision in WDLP 2 of a clear explanation of the site selection process and how it relates to the SA. This should expand on the information contained in WDL10.22 and explain: which sites have been considered as part of the SA process; why these sites were assessed and others were not; at what stage of the process they were appraised; and the findings of the assessment in respect of each appraised site including the reasons for site selection and rejection; and
- The addition of a new chapter in WDLP2 which provides a detailed overview of the findings appraisal of the draft (publication) plan and the cumulative effects of the plan contained in the chapter 8 of the document. This should systematically outline the timeframe, status, impact and synergies of the environmental report.

Q2. Strategic Context

In Matter 2, question 4, I asked if the Plan reflect the strategies and proposals of infrastructure providers. In response the Council’s statement indicated that the submitted Plan reflected most but not all the known strategies and proposals of infrastructure providers. The exception being the key strategic projects in relation to the Cambridge – Milton Keynes – Oxford Arc and the third runway at Heathrow, which were omitted because: they had not reached final decision stage; their impacts on the District had yet to be established; and that these matters would need to be addressed through a review of the Plan. As a consequence, the Plan is silent on the subject of both of these key strategic projects.

I am however, mindful that significant progress has been made on these projects at strategic and national level including: the publication of the Partnering for Prosperity: A new deal for the Cambridge – Milton Keynes – Oxford Arc Strategy by the National Infrastructure Commission in November 2017; the announcement of Government support for the scheme in the 2017 Budget Statement; Government approval of the defined corridor for the Oxford – Cambridge Expressway in

In light of these developments, I am concerned that the Plan’s continued silence in respect of these projects would raise questions about it soundness. I am interested to understand: the Council’s views on the potential growth implications of these strategic projects for the District; any changes necessary to the Plan to explain the implications of these strategic projects; and whether the submitted Plan is, or can be made, flexible enough to accommodate some of the early growth requirements of these proposals without requiring review.

Q3. Household Projections

The Council will be aware that the Office for National Statistics published the 2016-based Household Projections for England on 20 September 2018. It would be of assistance if the Council could provide me with their views on whether the new household projections represent a meaningful change in the housing situation in the District and if that would have any bearing on the soundness of the Plan.

Q4. Student Accommodation

Planning Practice Guidance in relation to Housing Needs and Economic Needs Assessment (2015) para 2a-021-20160401 advises that local planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. The Wycombe District Council Strategic Housing Market Assessment (2013) Report of Findings (HM4) indicates the presence of the Buckinghamshire New University is a potential driver for change in the High Wycombe housing market area. Given this, could the Council explain: what the existing and future student population in the District will be over the plan period; the impact this population will have on the housing market of High Wycombe; and how any change will be met?

Q5. Delivering Land for Business

Policy CP5 (3) of the submitted Plan allocates 21 hectares of new strategic and local employment land on 5 sites, to assist in meeting the economic needs of the District up to 2033. The Economic Development Topic Paper (TP3) paragraphs 5.17 and 5.18, explain that a flexible approach will be taken to the development of these allocated sites for Class B uses in order to ensure that the Plan can respond effectively to the changes in the employment market over the Plan period. Although I note that a brief reference to flexibility is made in paragraphs 4.62 and 4.63 of the submitted Plan, it is not clear how this approach has been addressed in Policy CP5 or if sufficient explanation of the practical application of the approach has been provided in the related reasoned justification. I am therefore interested to understand how the Council envisages this approach working in practice and how the issues I have identified can be ameliorated?

Nicola Gulley
Inspector
16/10/18