



## Gladman Developments Ltd

### Wycombe Local Plan Examination

#### **Matter 1 – Legal Compliance and Duty to Cooperate**

1. What are the relevant strategic matters in relation to the duty to cooperate?

No Comments.

2. In preparing the plan did the Council engage constructively, actively and on an on-going basis with neighbouring authorities and other relevant organisations on relevant strategic matters, in respect of the Duty to Cooperate? What were the outcomes of these discussions?

No Comments.

3. How has that cooperation been undertaken and have any formal agreements or Memorandum of Understanding been produced?

TP2 (para. 6.22) refers to the Memorandum of Understanding with Aylesbury Vale District Council relating to the share of unmet housing need from Wycombe (along with Chiltern and South Bucks) that Aylesbury Vale District Council has agreed to accommodate. The Vale of Aylesbury Local Plan makes provision for 28,830 dwellings, a total which includes a requirement of 27,400 with Aylesbury Vale's OAN accounting for 19,400 dwellings. Aylesbury Vale has committed the district to absorbing 2,250 dwellings from Wycombe's housing need.

At the current time, the full OAN for Aylesbury Vale and the district's proposed housing requirement have not been accepted by the Inspector, with the EiP of the Plan taking place during July 2018. Until the respective Local Plans for the Buckinghamshire local authorities are tested and adopted, neither the scale of unmet need, nor the question of whether Aylesbury Vale's planned absorption of unmet need from elsewhere in Buckinghamshire will enable the area to meet its full OAN, can be firmly established.

4. What outcomes have resulted from cooperation with adjoining authorities in relation to Housing; Gypsy and Travellers; Employment; and Infrastructure?

No Comments.

5. Has the plan been prepared in accordance with the adopted Local Development Scheme (WDLP 12)?

No Comments.

6. Has consultation on the Plan been carried out in accordance with the Council's Statement of Community Involvement (WDLP 11) and the requirements of the 2004 Act (as amended) and the 2012 Regulations?

No Comments.

7. Is the Sustainability Appraisal (WDLP 2) adequate in terms of its assessment of the likely effects of the Plan's policies and allocations and its consideration of reasonable alternatives and have the requirements for Strategic Environmental Assessment been met?

Gladman reiterate previous submissions regarding the Council's SA specifically in relation to growth in the Princess Risborough area. The Sustainability Appraisal of the Regulation 19 Wycombe District Local Plan was published in September 2017. Within this document there are four options identified as future growth around Princes Risborough, these vary from between 500 and 4,000 homes to be delivered in the Princes Risborough Expansion Area. The options are as follows:

- Option 1 – Low Growth – this proposes 500 homes by maximising brownfield development making efficient use of land within urban area and Park Mill Farm is an existing allocation in the 2004 local plan.
- Option 2 – Moderate Growth- this proposes 1,400 homes. Including the approach from Option 1 along with developing a further area of land between the railway line and Crowbrook Stream. This option is described as making a significant contribution towards meeting OAN.
- Option 3 – Moderate to High Growth – this proposes 2,400 homes. Through the inclusions of Options 1 and 2 with additional land to the north west of Princes Risborough. The SA outlines that this makes a very significant contribution to meeting the OAN.
- Option 4 – High Growth – this proposes 4,000 homes. This includes Options 1, 2 and 3 along with further growth to the north west of Princes Risborough. This option makes a greater contribution to meeting the OAN.

It is self-evident that the larger development options will have a more significant impact on local features and infrastructure, however as identified within the SA, the larger options for Princes Risborough's expansion would provide a very significant contribution to the OAN. Further, the larger options for development would afford greater opportunity for the improvement of local infrastructure. It is identified within the SA that: *"Option 4 would be more likely to improve access to Princes Risborough and Monks Risborough railway stations"*, while going on to state *"it is considered that Options 3 and 4 are more likely to deliver significant improvements to highways infrastructure"*

*and community infrastructure that would help to encourage a modal shift from the private vehicle to more sustainable modes of travel.” It is acknowledged within the same paragraph that “An uncertain effect is predicted for Options 1 and 2 against transport and traffic as they would be less likely to deliver transport infrastructure improvements”. It would appear therefore to be accepted within the SA that a larger growth option around Princes Risborough will both help to better meet the OAN and provide enhancement to local infrastructure that may not be available through the lower growth options. Gladman support this conclusion and agree that a high growth option is appropriate for Princes Risborough.*

Gladman believe that options for growth in excess of Option 3 (2,500) should have been given further consideration due to the significant benefits they would achieve in terms of housing delivery. Section 6.2.1 of the SA outlines the reasons for the preferred approach in this location. Gladman believe further consideration should have been given to higher growth in this location and that whilst Option 4 for 4,000 homes may have been considered by the Council to not be appropriate, and a step too far, Gladman believe that a scale of growth somewhere between 2,500 and 4,000 should have been a reasonable alternative which was considered through the SA and plan making process. The jump between these two growth options (Options 3 and 4) is significant and growth in the range of 3,000-3,500 would have resulted in different outcomes and we believe should have been properly tested.

Whilst it would seem clear that there are significant benefits to be gained from the higher growth option, it is unclear whether the potential downsides have been thoroughly considered and whether or not it would have been appropriate to plan for further growth in this location. Section 6.2.1 of the SA highlights that the larger options result in increased impact on the landscape and flood risk and also result in greater travel distances to the main services and facilities, thus increasing the reliance on travel by car. Gladman do not believe that this conclusion is correct as an SUE such as the Princes Risborough Expansion Area would be providing a number of services and facilities as well as the housing. Gladman believe the Council should have given greater consideration to these impacts and considered how much growth this location could take before the negative impacts outweighed the benefits.

Gladman refer the inspector to our Regulation 19 representations and also Matter 2 Hearing Statement which discusses how additional sustainable sites are available in Princes Risborough and how this location could be delivering a greater level of growth than is currently planned for. Gladman refer to land north of Mill Lane which falls within a number of parcels of land assessed within the Council’s SA, including SPR0073 and SPR007+37a. As outlined in our Matter 2 statement, the impacts of development of land off Mill Lane are overwhelmingly positive. Consequently Gladman believe that this site should have been given further consideration and that in turn a greater scale of housing could and should be directed to Princes Risborough through the Plan. This, as outlined above, would better help meet the OAN and help with the provision of significant infrastructure in this location.

8. Is the Habitats Regulations Assessment (WDLP 3) robust and does the plan include the measures (including a sustainable review mechanism) identified in this document as necessary to ensure compliance with the Habitats Regulations?

No comments.

9. In light of the ‘People over Wind, Peter Sweetman v Coilte Teoranta’ judgment is the Council content that the Habitats Regulations Assessment is legally compliant?.

No comments.

10. Does the Plan include policies designed to ensure that the development and use of land in Wycombe contribute to the mitigation of an adaption to, climate change?.

No Comments.

11. How does the Plan address the issue of air quality?

No Comments.

12. Does the Plan comply with all other relevant legal requirements, including those in the 2004 Act (as amended) and the 2012 Regulations?

No Comments.

13. Does the Plan provide robust mechanisms for the Monitoring and Implementation of the Plan’s Strategy?

No Comments.

14. Will the Plan be supported by Supplementary Planning Documents?

No Comments.