

# **Wycombe District Local Plan Examination**

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

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

1. This Examination Statement has been prepared by Nexus Planning on behalf of Inland Homes in support of draft site allocation HW9.

**Question 7 - Is the sustainability Appraisal (WDLP2) 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 made?**

1. The Sustainability Appraisal (September 2017) (document reference WDLP2) ("SA") considers the effects of the Plan's allocations against a wide-range of objectives across the three dimensions of sustainable development. Notwithstanding Inland Homes' separate objections to the exclusion of particular sites, the SA is consistent with Paragraph 8 of the NPPF in its methodology of assessing the sustainability of the allocations.
2. Inland Homes agrees with Wycombe District Council's general assessment of Part of Greens Farm, Glynswood within the SA (Table IIIC) (site ref. SHW0633 (7)), and we have the following comments on each of the SA objectives:
  - 1) Biodiversity - An ecological assessment has been carried out by the Environmental Dimension Partnership, which demonstrates that the existing grassland on the site is in poor condition due to a lack of management, resulting in a decrease in forb density and diversity, and the formation of a dense thatch. The development of the site provides the opportunity to improve the site's biodiversity value through the provision of enhanced grassland of better botanical value, and to introduce better management.
  - 2) Landscape - As detailed in the Landscape Assessment that was appended to our Regulation 19 Representations relating to draft Policy HW9, the proposed development of the site would only result in very limited visual change. Moreover, the site is only visible from a small number of locations. Any impact is further limited by the strong urban influence from the adjacent housing.
  - 3) Heritage - There are no heritage assets located on the site, and the Heritage and Views Assessment that was appended to our Regulation 19 Representations illustrates that the proposed development of the site will not interrupt views of the Disraeli Monument. Moreover, it was identified that views from the asset towards the site would not be altered as it is already difficult to differentiate the proposed site from the surrounding urban form. The National Trust's Regulation 19 Representation relating to this site concludes that: *"it is not considered that the residential development of this area would in principle be detrimental to the Trust's interests"*.
  - 4) Flood Risk - The site is located entirely within Flood Zone 1. Surface water has been considered in detail as part of a drainage strategy in support of a planning application currently being prepared for the site, and has been identified that suitable SUDS can be provided on the site to control run-off rates to greenfield levels.
  - 5) Energy Efficiency - All sites given a neutral score.

- 6) Best use of land, including soil - The site comprises greenfield land, and is not best and most versatile agricultural land.
- 7) Transport - A frequent bus service to High Wycombe and Aylesbury can be accessed on Hughenden Road, circa 280m west of the site. High Wycombe Railway Station is approximately a 1 mile walk from the site, and is easily accessible via the aforementioned bus service.
- 8) Housing - The site has capacity to deliver circa 50 dwellings, so is therefore a 'minor site' in accordance with the Council's assessment criteria. Nevertheless, the allocation makes a valuable contribution towards meeting the District's housing target.
- 9) Accessibility to services and facilities - As outlined in our Regulation 19 representations relating to draft Policy HW9, the site is located within 1km of a designated town/ district centre and business/ industrial park. A school and doctors' surgery are only 487m beyond the threshold sought by Wycombe District Council for achieving a ++ score. Nevertheless, the site should score at least a + score, rather than -.
- 10) Place-making - The site is located on the edge of the High Wycombe Urban Area.
- 11) Health - The site is located within 400m of green space open countryside, green infrastructure, and a public right of way providing access to the countryside runs along its eastern boundary. As such, it should obtain a ++ score, rather than +.
- 12) Strong and sustainable economy - The site is allocated for residential development.
- 13) Employment - The site is located within 1km of a town/district centre and a business/industrial park.
- 14) Education, skills and training - All sites given a neutral score.
- 15) Business and economic development - The site is not in employment use.

#### **Question 14 - Will the plan be supported by Supplementary Planning Documents?**

1. Our Regulation 19 representations in respect of Policy HW8 outline our concerns with the Council's proposed approach to requirement for a development brief to be prepared for this allocation. It is expected that this will be dealt with during Matter 7 (Stage 2 of the examination Hearing sessions) where this policy is due to be discussed in detail. However, should such matters be discussed in response to this question at Matter 1, Inland Homes would like to reserve the opportunity to respond, if required.