
Wycombe District Local Plan Examination

Further Written Statement
submitted on behalf of Gallagher Estates
(ID: 0953)

**Matter 2:
The Plan's Strategy**

June 2018

Wycombe District Local Plan Examination
Response to Inspector's Matters, Issues and Questions

Matter 2:
The Plan's Strategy

Barton Willmore LLP on behalf of
Gallagher Estates (ID: 0953)

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INTRODUCTION

- 1.1 Barton Willmore LLP is instructed by Gallagher Estates to submit this further written statement in response to the Inspector's Matters, Issues and Questions. These representations expand upon the representations submitted on behalf of Gallagher Estates at the earlier stages of the Wycombe District Local Plan's preparation.
- 1.2 Gallagher Estates controls land off Shootacre Lane on the southern edge of Princes Risborough which is promoted for residential development. The site includes land which is identified as part of the 'Area for Comprehensive Development' in order to provide the southern section of the proposed Relief Road. It is not proposed in the Local Plan as an allocation for residential development; it is an omission site.
- 1.3 Our representations submitted in response to the Regulation 19 Local Plan consultation included a Vision Document which presents our client's development proposals for the site.

RESPONSE TO MATTER 2 – THE PLAN'S STRATEGY

2.1 Is the Vision sufficiently aspirational and locally specific to form the basis for planning in Wycombe over the Plan period?

2.1.1 No, the Vision (provided below paragraph 3.1 of the Local Plan) is not locally specific and, in our view, does not provide any practical purpose.

2.2 Are the Plan's objectives appropriate, positively prepared and justified and are they capable of delivering the vision for Wycombe District set out in the Plan?

2.2.1 The Plan's objectives extend to cover a range of strategic planning matters relevant to the District. They are broadly supported.

2.2.2 Importantly, however, the application of the objectives must be viewed in the context of our submission to Matter 3. As we have set out, our assessment of the OAN for Wycombe District (minimum of 775 dpa) is significantly higher than the OAN in the Buckinghamshire HEDNA (660 dpa).

2.2.3 Thus, we consider that the application of the objectives, including that the Council should contribute its "fair share", would necessarily result in an increased housing requirement for the District.

2.3 Is the Plan's Spatial Strategy (Policy CP2) consistent with the requirement of the NPPF to promote sustainable development?

2.3.1 As we explain in our written statement for Matter 6: Green Belt, we do not consider the Local Plan to be sound in its approach to Green Belt. In summary, we consider criterion 1. a) ii. to conflict with paragraphs 83 and 85 of the NPPF, in that the Green Belt boundaries defined in the Plan are not capable of enduring beyond the plan period.

2.3.2 To address this soundness issue, safeguarded land should therefore be identified, recognising that non-Green Belt opportunities for (housing) development have been exhausted through this Plan and that it is inevitable that Green Belt release will be necessary through a future plan review.

- 2.3.3 Furthermore, as we will address in more detail in our response to Matter 8: Princes Risborough, the Plan's strategy for growth at Princes Risborough is too heavily dependent upon the delivery of the Main Expansion Area to the west of the town. There is no resilience built into the Plan in the event of this development being delayed and how the need for housing at Princes Risborough would otherwise be met.
- 2.3.4 This approach does not in our view constitute a positively prepared or effective strategy for Princes Risborough. We recommend therefore that a reserve site, or sites, should be identified at Princes Risborough to provide for flexibility to ensure that the Plan's housing requirement will be delivered.
- 2.3.5 Taking the above into account, and having regard to the extent of AONB constraint affecting all land to the south, east and north of Princes Risborough, the only reasonable options for such safeguarding or reserve allocations is likely to involve "major development" within the AONB.
- 2.3.6 We therefore seek modifications to criterion 1. a) i. of Policy CP2, deleting the second part as follows:

"Attaching great weight to conserving the landscape and scenic beauty of the Area of Outstanding Natural Beauty when considering allocating sites in the Area of Outstanding Natural Beauty, and not allocating sites that constitute ~~"major development" in the Area of Outstanding Natural Beauty;~~"

- 2.3.7 We will explore this aspect of the Plan in greater detail in our written statement for Matter 8, to be submitted in due course.

2.4 Does the Plan reflect the strategies and proposals of infrastructure providers?

- 2.4.1 We have no further comments.

2.5 Has the Plan's Spatial Strategy been positively prepared, is it justified and will it be an effective mechanism for delivering growth over the Plan period?

- a) Does the Plan's Spatial Strategy represent an effective approach to delivering sustainable development (Policy CP1) over the Plan period?***

- 2.5.1 No. The Plan's Spatial Strategy includes a significant proportion of new housing being delivered through the Princes Risborough Main Expansion Area. The Council anticipate that the site will provide approximately 1,750 units within the plan period, out of a total of 2,047 homes at Princes Risborough and a total supply of 10,927 homes across the District. The Plan includes no flexibility in the event of under-delivery from the Main Expansion Area. As such, there is a significant risk in our view that the Plan will fail to provide for sustainable development, including meeting the identified need for market and affordable housing.
- 2.5.2 Given the over-reliance on this single strategic development, we consider that there is a need to identify reserve sites which could come forward in the event that delivery rates are slower than expected. We consider that there are sites adjacent to Princes Risborough which could be allocated by the Council, including at Shootacre Lane.
- 2.5.3 Furthermore, significant infrastructure works are required to support development at Princes Risborough, including the relief road identified within Policy PR3 as required *'for the proper planning of the area, as the development is dependent upon its provision'*. We note that promoters of individual parcels within the Main Expansion Area have stated that there is the potential for developers to be burdened with significant costs which could, ultimately, impact on development viability. We will address this in greater detail in our written statement for Matter 8.

b) What are the key components of the Plan's Spatial Strategy and how do they interact?

- 2.5.4 As set out in response to a) above, a key component of the Plan's Spatial Strategy is the Princes Risborough Main Expansion Area. Associated with this strategic allocation is the infrastructure required to support this development, the deliverability of the quantum of development relied upon, and the resilience of the Plan to respond to potential under-delivery in the event of delays. The Main Expansion Area is not only a key component of the Plan's Spatial Strategy for the District as a whole, it is *the* key component for Princes Risborough and we have set out that the Plan is over-reliant on this, particularly in respect of future growth at Princes Risborough.
- 2.5.5 Against this background, the approach taken towards the protection of the AONB, rejecting any proposal for "major development" in the AONB, is too restrictive in our view. For the reasons given above, and as will be presented in our submission for Matter 8, such an approach at Princes Risborough is not a positively prepared and

effective mechanism for delivering growth over the plan period, given that any additional release of land at Princes Risborough to meet identified development needs would likely require land within the AONB including land north of Shootacre Lane which is controlled by Gallagher Estates.

c) Does the Plan's Spatial Strategy effectively link transportation, employment and housing growth?

2.5.6 We have no specific comments to make on the Plan's overall Spatial Strategy.

2.6 Has the Settlement Strategy (Policy CP3) been positively prepared, justified and will it be effective in delivering sustainable growth?

a) How has the settlement hierarchy been defined and what level of growth is proposed for each tier?

2.6.1 The approach taken by the Council which identifies Princes Risborough as a Tier 2 settlement and a Transport Hub is supported. However, for the reasons set out above, we seek modifications to Policy CP3 (criterion 2.) to identify a reserve site(s) and/or safeguarded land.

2.7 How many Neighbourhood Plans are there in Wycombe, where are they and what is their status?

2.7.1 No comment.

2.8 Is the Spatial Strategy sufficiently flexible and can it respond effectively to changing circumstances?

2.8.1 No. As set out in response to a) above, there is a need, as a minimum, for reserve sites to be allocated at Princes Risborough to ensure that the Plan is sufficiently flexible to respond to delays and any associated under-delivery of housing from the Main Expansion Area.