

Wycombe District Local Plan Examination

Matter 2 - The Plan's Strategy

Statement by Berkeley Strategic (June 2018)

- 2.1 This Statement is prepared by Berkeley Strategic ('Berkeley') in relation to Matter 2 of the Wycombe Local Plan examination.
- 2.2 Berkeley controls the Abbey Barn South and Wycombe Summit site which is an allocation within the Local Plan (Policy HW5). Berkeley also controls two sites at Chapman Lane, Bourne End and Heath End Farm, Flackwell Heath.
- 2.3 Berkeley's previous consultation response on the Proposed Submission version of the Local Plan (November 2017) raises concerns in relation to the Council's proposed strategy. These concerns are expressed below in response to the Inspector's questions.

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

- 2.4 Berkeley's considers that the Local Plan vision, whilst not necessarily unsound, is a short and rather generic statement that would benefit from a greater local emphasis, including setting out a commitment to planning for the future development needs of the local area. Berkeley would therefore suggest that the Council should be asked to amend and expand the vision's wording accordingly.

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?*

- 2.5 Berkeley considers that the balance of the Council's objectives appears to be weighted in relation to protecting the Green Belt and AONB rather than planning to meet the development needs of the district in full. In this sense the objectives fail to represent sustainable development, focusing too much on the environmental dimension without sufficiently addressing the economic and social dimensions, which is a requirement of the NPPF.
- 2.6 Objective 6 of the Local Plan is for the Council to '*contribute our fair share towards tackling the need for more housing including for affordable housing and other specific housing needs of the community, including catering for a growing aging population*'.

The supporting text to Objective 6 explains that the term 'fair share' includes optimising the amount of housing working within the constraints of the Green Belt and AONB.

- 2.7 The Council's objective 6 would benefit from reference to the approach to housing set out in the NPPF which includes the requirement to boost significantly the supply of housing and use the evidence base to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area.
- 2.8 The Council's commitment to protecting the Green Belt and the AONB are separately the focus of Objectives 1 and 2 and Berkeley is concerned that the Council's approach to delivering housing as set out in Objective 6 is overly focused on these constraints.
- 2.9 The current wording of Objective 6 points towards the negative and constrained approach to delivering housing assumed by the Council that is in turn manifested in the proposed spatial strategy which does not fully explore the full potential for housing on all sustainable sites within the district, including additional sites which could be developed without causing harm to the purposes of the Green Belt, such as Berkeley's sites at Bourne End and Flackwell Heath.

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

- 2.10 As stated in the October 2017 representations, Berkeley objects to policy CP2 where it states the intention for the Council to meet '*as much of the District's need for housing and employment land as it is sustainable to do so*'. Berkeley considers that the Council's approach to reviewing sites and the Green Belt is inconsistent and insufficiently thorough as it fails to identify sites which are suitable, available and achievable and could be developed without causing harm to the purposes of the Green Belt.
- 2.11 To ensure soundness, Policy CP2 should be revised to include a stronger commitment to meeting the housing needs of the area, including releasing Green Belt land where there are exceptional circumstances and where it is sustainable to do so i.e. without causing harm to the purposes of the Green Belt.

4. *Does the Plan reflect the strategies and proposals of infrastructure providers?*

- 2.12 Berkeley does not have any comments on this question.

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?

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

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

2.13 Berkeley supports some aspects of the proposed Spatial Strategy, including the identification of Abbey Barn South site for development, given its sustainable location in the Tier 1 settlement, High Wycombe. However, Berkeley considers that the proposed Spatial Strategy is not positively prepared and would be ineffective in delivering sustainable development, in that it would fail to meet the district's housing requirement in full.

a. Berkeley believes that the constraints-led approach of the Council, with its reliance on Aylesbury Vale District to deliver 2,275 or 2,250 dwellings during the Local Plan period (depending on which district's plan is being looked at), is an unsustainable approach. This is in the context of there being clear evidence of further development potential within Wycombe and given that the Aylesbury Vale Local Plan, to which Berkeley has outstanding objections, includes overly optimistic assumptions about housing delivery the Aylesbury area. The proposed approach is not effective and raises questions of soundness.

b. Berkeley does not have any comments on this sub question.

c. In relation to linking transportation, employment and housing growth Berkeley supports the development of sites that provide good access to local facilities, services and employment opportunities in appropriate locations. Berkeley supports the approach to settlement strategy, which prioritises development in sustainable locations, including the identification of High Wycombe as the district's Tier 1 settlement and the identification as Bourne End and Flackwell Heath as Tier 2 and Tier 3 settlements respectively, being sustainable locations close to Wycombe with good existing local facilities, services and transport links.

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?

2.14 As previously set out Berkeley is supportive of the Local Plan settlement strategy in general including the identification of the settlements that are most suitable to accommodate growth (Tiers 1, 2 and 3) including High Wycombe, Bourne End and Flackwell Heath.

2.15 As a Tier 1 settlement, High Wycombe should be the focus and priority for growth in the district. However, given its role within the settlement strategy as set out in Policy CP3 as a sustainable location for growth, Berkeley considers that Bourne End has further potential to accommodate housing beyond the level currently identified. The Council already accepts that there are exceptional circumstances to warrant releasing Green Belt land at Bourne End and the Green Belt evidence submitted by Berkeley demonstrates that there is potential for this location to accommodate further growth without unacceptable impact on the Green Belt purposes as defined by the NPPF.

2.16 Similarly Flackwell Heath, as a Tier 3 settlement within the settlement hierarchy located close to High Wycombe, has further potential to accommodate sustainable growth beyond the level currently identified without harming the Green Belt. Berkeley's site at Heath End Farm can be developed employing a sensitive design approach which could also establish a more defensible Green Belt boundary.

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

2.17 Berkeley does not have any comments on this question.

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

2.18 Berkeley is concerned that the Spatial Strategy does not provide sufficient flexibility that would enable the district's housing requirement to be met in full over the Local Plan period. Berkeley is of the view that the Council should identify additional sites in the district capable of delivering additional homes to meet the Council's OAN, preferably

as full allocations, or if not as reserved sites, which could be brought forward during the Local Plan period if necessary.

- 2.19 At present the Council is proposing a housing supply of 10,927 homes to achieve a target of 10,925 homes over the Local Plan period with a reliance on Aylesbury Vale to make up the shortfall of its OAN (2,275 homes). Berkeley notes that, whilst the Council claims to be able to demonstrate a five year housing land supply plus a buffer of 5%, it does not identify any significant additional supply above the minimum of its OAN over the whole Local Plan period. Berkeley considers that, as there is some doubt over the delivery of the unmet housing need (2,250 or 2,275 dwellings) in Aylesbury Vale, the Council should identify additional developable sites, or at least reserve sites, within the district that are capable of coming forward to provide a longer term buffer above the OAN level. Berkeley considers this should be a minimum of 5% of OAN or 660 homes. This approach would ensure that the Local Plan is sufficiently flexible to respond to changing circumstances, one of which Berkeley believes is the likely shortfall in delivery of the unmet need in AVDC, but could of course also include under delivery on sites within Wycombe.
- 2.20 Berkeley notes that other local planning authorities, including those which are constrained by Green Belt land, have included additional supply beyond their minimum OAN in their Local Plans in order to provide greater flexibility to ensure that sufficient land supply can be maintained over the whole Local Plan period. Furthermore the identification of land either as full allocations - or reserved sites - would accord with the NPPF requirement for authorities to boost the supply of housing (i.e. it would in any event be a sound spatial planning approach to over allocate land suitable for housing against OAN). Some recent examples are shown in Table 2.1 Below.

Table 2.1 – Example Local Plans where Housing Supply Exceeds OAN

Council	Adoption Date	OAN Requirement	Planned Housing	Reasons
Derbyshire Dales District Council	7/12/17	5,680 dwellings	6,684 dwellings	This represents flexibility of 17% additional supply and ensures that the District's OAN up to 2033 can be met.
North West Leicestershire District Council	21/11/17	9,620 dwellings	10,592 dwellings	The Council is planning for 972 dwellings over the plan period above OAN through a number of additional allocations due to a previous shortfall in allocations of 600 dwellings. Therefore, the District is providing a degree of flexibility in the unforeseen event that some of the identified sites

				do not come forward as predicted.
				In addition, there may be a need to accommodate additional housing development from elsewhere in the Housing Market Area.
Cheshire East Borough Council	27/7/2017	36,000 dwellings	39,560 dwellings	Even though the Borough is constrained by Green Belt, the Council has chosen to increase the plan period target by 3,560 dwellings. This will provide the Council with flexibility and to allow for a proportion of slippage, such as developments occurring after the plan period, or for allocations coming forward at lower densities than currently expected.

2.20 The Spatial Strategy should accordingly be amended to include planning for a level of housing development above the level currently identified that would provide flexibility and ensure OAN will be met in full.