



Gladman Developments Ltd

Wycombe Local Plan Examination

Matter 2 – The Plan’s Strategy

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

Gladman have no specific comments to make with regards the Plan’s vision.

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?

Gladman have no specific comments to make regarding the objectives identified within the Plan.

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

Gladman remain unconvinced by the proposed strategy when combined with the heavily constrained housing requirement. Given the circumstances in Wycombe District, specifically the significant areas of Green Belt and AONB, it is fundamental that all of the potential development options are robustly considered and that the Local Plan does not include blanket protection policies which arbitrarily restrict growth. As detailed later through this and other statements, Gladman strongly object to the principle of the Strategic Buffer proposed around Princes Risborough. This limits the ability of this growth area to expand any further and there does not appear to be any clear evidential basis for this approach. The proposed approach in effect could restrict sustainable development from coming forward.

Gladman believe that the Council’s own evidence in the SA of additional sites around Princes Risborough points to further development in this location being suitable. Therefore we do not believe it is justified to apply a ‘buffer zone’ such as is proposed which would effectively restrict any further growth beyond the proposed expansion area.

As an example 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 (this site is discussed in detail within our previous submissions). It is accepted within the assessment text that the site SPR0073 does have the capacity to accommodate a level of development, while being “situated adjacent to existing development on two sides”. It is further acknowledged that the application of an

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appropriate mitigation against any potential landscape impacts would be significant in reducing any harms to a ‘residual minor negative effect on landscape’. When incorporating the larger SPR007+37a assessment area, it is still considered that overall this will result in a minor residual effect on landscape.

Gladman refer to the extract from the SA shown in Figure 1 below, it is clear that the impacts of development of land off Mill Lane and north of Longwick Road are overwhelmingly positive. The only ‘major negative impact’ identified is best use of land including soil, which is presumed to refer to the potential loss of best and most versatile land (BMV). Gladman consider that the provision of much needed market and affordable housing in this heavily constrained authority outweighs the potential loss of BMV land and any proposed scheme in this location would incorporate a significant element of open space.

Options		SA Objectives														
Site Ref (AECOM ID)	Site Name	1. Biodiversity & Geodiversity	2. Landscape & Countryside	3. Heritage & Townscape	4. Water & Flooding	5. Energy efficiency, climate	6. Best use of land, including soil	7. Transport	8. Population & Housing	9. Accessibility	10. Place-making	11. Health	12. Provision of employment	13. Distance to employment	14. Education, skills & training	15. Loss of existing employment
SPR0035 (29)	Land fronting New Road	0	+ ?	+ ?	+	0	++	+	+	++	+	+	+	++	0	+
SPR0034 (30)	Land south of Horns Lane	0	+ ?	+ ?	0	0	++	+	+	++	+	+	+	++	0	+
SPR0073 + 37a (39)	Mill Lane / Land north of Longwick Road	0	- ?	- ?	+	0	--	-	++	+	+	++	0	++	0	+
SPR0036 + 82 (41)	Land off Poppy Road including 108 Wycombe Road	- ?	0 ?	0 ?	--	0	- ?	+	+	-	+	--	0	++	0	+
SPR0036 + 82 + 91 (42)	Culverton Farm Princes Risborough	- ?	0 ?	0 ?	--	0	--	+	++	-	+	--	0	++	0	+

Figure 1. Extract from SA - Appraisal findings for Princes Risborough (including sites SPR0077 and SPR0073+37a)

Gladman find the proposed approach to the inclusion of a Strategic Buffer around the Princes Risborough Expansion Area particularly concerning given the fact that the Council is so heavily constrained by the AONB and Green Belt and the Local Plan is proposing a capacity led housing requirement.

Given that the Local Plan is not proposing to meet its OAN in full and is exporting housing need to other local planning authorities it should be taking a very thorough approach, to identifying capacity to deliver its housing need within its own authority area. Gladman refer to the Inspectors initial findings for the Lewes District Local Plan¹. Within this the Inspector outlined “*I am not at all convinced that “no stone has been left unturned” by the Councils, in terms of seeking as many suitable and appropriate sites for new housing as possible that are realistically deliverable in sustainable locations across the plan area. This is evidenced in the various iterations of the Strategic Housing Land Availability Assessment (SHLAA) and as put forward in representations to the examination in some cases.*”

As outlined above and in previous submissions Gladman believe there to be additional sustainable sites which could deliver housing on the edge of Princes Risborough and that these should not be unnecessarily restricted from coming forwards. Therefore, Gladman believe that the Inspector for

¹ Lewes Local Plan Initial Findings, 10th February 2015.

this EiP should identify a similar concern to that of the Lewes Inspector that ‘no stone has been left unturned’ as other suitable sustainable sites are available within the district.

Furthermore, Gladman refer back to our Matter 1 Hearing Statement where we noted that the AVDC OAN has not yet been tested and could itself increase, which would potentially reduce AVDC’s ability to accommodate the current scale of unmet need as proposed through this plan. This further highlights the need for Wycombe District to accommodate as much as its own OAN as is possible to do so.

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

Gladman have no specific comments in response to 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?

Policy CP2(1)(a) outlines how the Council will be delivering what they believe to be as much of the Districts need for employment and housing land as is sustainable to do, whilst protecting the AONB and Green Belt. Whilst Gladman accept that there are instances where constrained housing requirements below the OAN figure will be appropriate, the Council has not identified its full capacity to deliver housing in sustainable locations. The Council must ensure that every contingency is fully explored, and that the pros and cons of further allocations in Wycombe District are adequately explored. It is clear from looking at the Princes Risborough expansion area that the Council has not maximised sustainable development in this location. There are further sustainable growth options available to the Council which have been resisted and which the plan would unnecessarily preclude from coming forwards.

With regards to Objectively Assessed Housing Need and the fact the plan is not seeking to deliver this in full, please also refer to our Matter 3 Hearing Statement. Gladman do not consider the OAN to be robust and do not believe the strategy as a whole is positively prepared.

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

Gladman have no specific comments in response to this question.

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

Part 1(b) and (c) of Policy CP2 outlines that the Strategy directs roughly 85% of the housing requirement to the four large settlements (tiers 1 and 2 of the settlement hierarchy) and the remainder to the villages. Gladman are supportive of this approach which directs the majority of growth to these high order settlements, whilst recognising that a degree of growth (15%) should be

delivered in the smaller settlements to help meet their own needs and to ensure their sustainability and viability.

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

Gladman have no specific comments in response to this question.

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

Gladman are generally supportive of the settlement strategy as set out within Policy CP3. Notwithstanding this, the policies within the plan which link to the delivery of the spatial strategy need to be sufficiently flexible to enable growth to come forward throughout the course of the plan period and should not act to arbitrarily restrict further opportunities for sustainable growth. There may be changes in circumstances over the course of the plan period and the spatial strategy and policies within the plan must be flexible enough to adapt to this. See response to question 8 below.

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

Gladman have no comments to make in response to this question.

7. How many neighbourhood plans are there in Wycombe, where are they and what is their status?

Gladman have no comments to make in response to this question.

8. Is the spatial strategy sufficiently flexible and can it respond effectively to changing circumstances?

Gladman do not believe the plan to be sufficiently flexible. Gladman consider it to be too restrictive and that it does not have the ability to respond to changing circumstances. In this regard, Gladman refer to policy PR5 ‘Princes Risborough Settlement Boundary and Strategic Buffer’. Whilst this is a key location for growth within the settlement strategy, which is an approach Gladman support, Policy PR5 restricts any further growth beyond that currently proposed. Gladman submit that there appears to be no tangible evidence that expansion beyond the proposed settlement boundary and within the Strategic Buffer would cause material harm. Further objections regarding this policy specifically will be included in our Matter 8 Hearing Statement, however it is key to raise the issue when considering the overall spatial strategy and the lack of flexibility to accommodate further growth in these key locations. It is important to note that this location is not as heavily constrained by the Green Belt and AONB and therefore we believe arbitrarily resisting any further growth or flexibility for growth / contingency is not a sound approach.

Gladman note that the proposed standardised methodology is pointing towards a higher housing requirement for Wycombe; it is therefore concerning that there is no solution for further growth due to the proposed restrictive strategic buffer.