



WYCOMBE LOCAL PLAN EXAMINATION IN PUBLIC

HEARING STATEMENT

MATTER 2 – THE PLAN’S STRATEGY

ON BEHALF OF ENDURANCE ESTATES STRATEGIC LAND

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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1. INTRODUCTION

- 1.1 This Hearing Statement is prepared by Pegasus Group on behalf of Endurance Estates Strategic Land, which has development interests at land at Culverton Hill, Princes Risborough.
- 1.2 Endurance Estates has worked up proposals for development of the site having regard to the site-specific constraints and opportunities, and following discussion with the Area of Outstanding Natural Beauty (AONB) Board. These are explored more fully in the Regulation 19 representations which are available to the Inspector.
- 1.3 In summary, the current scheme provides for housing (both open market and affordable) located around the fringes of the site as informed by the landform of the site. It should be noted that the site is already enclosed by development on three sides. It will also provide for a substantial amount of public open space around the high point of the site and the south-eastern edge towards the Upper Icknield Way and the surrounding countryside, creating an appropriate transition with the wider AONB. This presents the opportunity to create a 'gateway' to the settlement. Appropriate landscape treatment is proposed to create new habitat for the Duke of Burgundy butterfly.
- 1.4 Whilst the Inspector has made clear that she does not intend to consider the merits of specific 'omission' sites through the Examination, Endurance Estates has concerns about the soundness of the wider Plan strategy insofar as it applies to Princes Risborough and considers that additional sites are required to provide flexibility in the Plan. Endurance Estates would welcome the opportunity to explore, with the Council, the potential of land at Culverton Hill to contribute to a more flexible Plan strategy.

2. MATTER 2 – THE PLAN'S STRATEGY

Q1: Is the Vision sufficiently aspirational and locally specific to form the basis for planning in Wycombe over the Plan period?

- 2.1 Yes – the vision recognises the local opportunities for development in Wycombe, including the opportunities to conserve and enhance the Chiltern Hills (including the AONB), the economic opportunities presented by existing economic clusters and new infrastructure, and the strengthening of the District's town centres.

- 2.2 However – section 6 of the vision relates to the need to “*contribute our fair share*” towards new housing. In our view a Plan which does not meet its own objectively assessed needs in full could not be said to meet its ‘fair share’. Whilst Endurance Estates recognises that the District is heavily constrained by AONB designations and that unmet need will be addressed by Aylesbury Vale District Council, there nonetheless remain opportunities to deliver housing within the AONB in an imaginative way, which can deliver enhancements to the AONB itself. This will also provide much needed flexibility in the Plan itself.
- 2.3 The wording of the vision is therefore inconsistent with the national policy imperative to ‘boost significantly’ the supply of housing. It should therefore be amended to refer to meeting the needs of Wycombe District to the greatest possible extent in the most flexible way, in the context of the policies of the Framework. This approach should go ‘in tandem’ with the allocation of additional sites where appropriate, land at Culverton Hill being one such site.

Q3: Is the Plan’s Spatial Strategy (Policy CP2) consistent with the requirement of the NPPF to promote sustainable development?

- 2.4 In general terms, Endurance Estates supports the distribution of development set out within policy CP2 (b), which emphasises the capability of the four largest settlements in Wycombe District (including Princes Risborough) to accommodate sustainable development.
- 2.5 However, we disagree with policy criterion CP2 (a) (i) which sets out that the Council will not allocate sites which constitute ‘major development’ in the AONB. Paragraph 116 of the Framework explains that ‘*planning permission should be refused for major development in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest*’. This clearly contemplates that major development *could* come forward within the AONB, provided the circumstances justify it.
- 2.6 It is important to remember that there is no clear definition of ‘major’ development in the context of the AONB and this is, to an extent, a matter of planning judgement. A framework to assist this judgement has been developed with the AONB Board (contained in **AONB1**). As part of this judgement, it should be borne in mind that not all sites in the AONB necessarily share the same

qualities as the wider AONB as a whole – for example, land at Culverton Hill is surrounded by development on three sides.

2.7 Even if a development proposal is considered ‘major’, there are good reasons why a specific site might still be able to come forward under paragraph 116 of the Framework:

- Addressing unmet need in Wycombe will support the local economy through increased employment during construction, and ongoing local expenditure. At the national level, it will contribute towards the Government’s overall objective to deliver 250,000 – 300,000 dwellings per annum across the country.
- There is the potential to address unmet housing need under the Duty to Cooperate, and Aylesbury Vale has agreed to do this. However, it is preferable to meet housing need as close as possible to where it arises so the opportunities to develop within Wycombe district should be maximised. Furthermore, redistributing growth under the Duty to Cooperate means there is a reliance on the neighbouring authority to bring their plans forward in a timely fashion.
- Through careful consideration of site specific constraints and opportunities, it is possible to secure development which achieves an appropriate design response, minimises detrimental effects on the environment, landscape and recreational opportunities. Furthermore, through careful collaborative design, development can achieve betterment in respect of these matters.

2.8 As such, it is not a ‘black and white’ issue as to whether development can come forward in the AONB – irrespective of whether it is ‘major’ development or not. What is important is that where sites are put forward for development, they are fully assessed to understand their suitability for allocation.

2.9 In the case of Culverton Hill, Endurance Estates consider that the development proposals may not necessarily represent ‘major’ development, being of a modest scale in proportion to both the main settlement and scale of development at the Expansion Area, and with a careful scheme design to minimise adverse impacts on the AONB and achieve an element of betterment.

Q4: Does the Plan reflect the strategies and proposals of infrastructure providers?

- 2.10 Insofar as Princes Risborough is concerned, the Plan's distribution of development reflects the potential of the settlement to make the most of the potential of forthcoming railway upgrades. These include the existing Chiltern Railways service which has been upgraded in recent years (including a mix of express and local services towards London Marylebone, Banbury and Aylesbury, plus a new peak time service to Oxford) and the proposed East West Rail service between London Marylebone and Milton Keynes (expected to commence in 2024) providing a new link to the Oxford-Cambridge 'Varsity Line' and destinations on the West Coast Main Line.
- 2.11 These infrastructure upgrades will provide fast and convenient links to major growth locations including destinations across the Oxford – Cambridge Arc such as Oxford and Milton Keynes. Princes Risborough is therefore ideally placed within the District to take advantage of these proposed new links. This underlines its sustainability credentials and in this context, the town is considered capable of accommodating further growth in a sustainable way.

Q5: 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?

- 2.12 Endurance Estates is concerned that the Plan will not be an effective means of securing sustainable development at Princes Risborough owing to its reliance on the Expansion Area during the Plan period to deliver 85% of the growth directed to this sustainable settlement (1,662 units of a total of 1,951 units).
- 2.13 Princes Risborough is rightly identified within the spatial strategy as one of the most sustainable settlements in the District with good access to major railway routes and a wide range of local shops, facilities and services in the town centre capable of serving everyday needs. This is highlighted in the Settlement Hierarchy Study 2017 (**SHS1**).
- 2.14 The Expansion Area proposals are complex and rely upon the delivery of significant infrastructure including a new road, creation of new / upgraded railway underpasses, and necessary social infrastructure and facilities. Whilst the Expansion Area now benefits from a Housing Infrastructure Fund allocation which

could assist in funding the delivery of infrastructure, there are other non-financial matters to consider. This includes:

- The potential impact upon the AONB of the link road serving Phase 3 of the Expansion Area for which the Council's preferred option takes an alignment through open countryside and requires an engineered junction with the A4010 which will require street lighting. It is understood the AONB Board has significant concerns about this design approach.
- The provision of routes under the railway. Currently these are envisaged as taking place at a time when the line will be closed anyway for upgrade works. However, the timing of this is subject to change and could be affected by the build programme of the Expansion Area, cash flow, and Network Rail's own timescales and ability to hand over possession of the line.

2.15 These factors could ultimately delay delivery of the Expansion Area and in turn, the delivery of new homes in Princes Risborough. This could also affect the Council's ability to meet the forthcoming Housing Delivery Test which is due to take effect in late 2018 and will set increasingly stringent targets for housing delivery. In order to achieve sustainable development in this well-served location, in line with the Spatial Strategy and at the necessary pace, Endurance Estates consider that further flexibility is needed within the Plan and that additional sites should be allocated in the town.