

WYCOMBE DISTRICT LOCAL PLAN EXAMINATION

MATTER 2 - THE PLAN'S STRATEGY

MR L NOE - ID REF. 0979

Additional statement responding to the Inspector's Schedule of Matters, Issues and Questions. These representations do not repeat matters set out in previous representations on behalf of Mr Noe, and do not seek to respond to every question raised in the Inspector's Schedule. The matters set out below focus on particular issues which the representor considers to be important in relation to assessing the soundness of the Plan.

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

1. The vision for the Plan - to create an economically strong District where it is desirable to live, work and visit - is a rightly ambitious set of goals and they are founded on the Sustainable Community Strategy for Wycombe District 2013 - 2031. This Strategy is both detailed and locally specific and based on a key understanding of the District and the particular challenges it faces. These challenges are: creating and maintaining a thriving economy; achieving sustainable development; improving community safety; ensuring health and wellbeing and increasing community involvement. As a consequence the Vision for the Plan is both sufficiently aspirational and locally specific.

Q2. 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. The eight objectives of the Plan draw on the Sustainable Community Strategy for Wycombe District 2013-2031. Essentially these objectives seek to protect key landscapes/designations, deliver sustainable growth and improve existing infrastructure and connectivity. This approach is considered to be consistent with the requirement to meet the need for new development in a sustainable manner. The first two objectives - Cherish the Chilterns and Strengthen the Sense of Place - clearly set the priorities for this strategy with the remaining objectives aimed at delivering growth sustainably and mitigating climate change. Since these objectives recognise and prioritise the issues facing the District they are considered to be appropriate, positively prepared and justified and are capable of delivering the vision set out in the Plan.

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

3. The NPPF approach to sustainable development and plan making is that LPAs should positively seek opportunities to meet the development needs of their area. Policy CP2 is a clear

strategy to meet as much of this need as possible in a sustainable way. The policy makes a clear distinction between where development will be acceptable and where it would not. The (limited) release of green belt land envisaged by the strategy is to be undertaken only in exceptional circumstances and is, therefore, consistent with the approach in paras. 83-85 incl. of the NPPF.

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?

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?

4. The spatial strategy is positively prepared since it seeks to meet objectively assessed development needs within the context of the characteristics of the District. The Plan has 8 strategic objectives and collectively these underpin the core planning principles relating to sustainable development as set out in the NPPF. This approach acknowledges and clearly distinguishes between those parts of the District where development should be constrained and those areas where sustainable development can be successfully accommodated. This is a clear mechanism for the delivery of growth in a sustainable manner consistent with the objectives of policy CP1.

5. Appendix H to the Plan links other policies in the Plan to the 8 strategic objectives which demonstrates the interaction between policies and how this will achieve/deliver the objectives.

6. There is one Tier 1 settlement (High Wycombe) and three Tier 2 settlements (Princes Risborough, Marlow and Bourne End/Wooburn) in the District. These four larger settlements already have the widest range of facilities and the highest level of public transport accessibility. They are clearly the most sustainable locations for development in the District and rightly form the focus for new development.

7. The Tier 3-6 settlements have a much more limited role in contributing to development needs within the Plan reflecting their lower status in the settlement hierarchy.

8. The key plans, projects and initiatives relating to sustainability within the District are:

- The Strategic Economic Plan;
- The Buckinghamshire Infrastructure Investment Plan;
- WDC Topic Paper 4: Transport;
- HS2;
- East West rail project;
- Crossrail – improving connections to central London from Maidenhead;
- Buckinghamshire Local Transport Plan 4
- Highways England work feeding into the next Route Investment Strategy (RIS2);
- Infrastructure Delivery Plan September 2017 (WDPL5); and
- Sustainability Appraisal (September 2017) (WDPL2).

9. The linking of new development within the Plan (noting that the main locations for development are already the best linked in the District) is, encouraged by for example, better public transport services through smart ticketing, real time information infrastructure and coherence on ticketing between operators. For rail, improvements are proposed associated with Crossrail and the Marlow Branch Line, which in 2019, when fully operational will connect high frequency services from Reading and Maidenhead to central and east London.

10. Additionally, railway improvement schemes at Bourne End station will allow up to twice-hourly services to Maidenhead from Marlow and Bourne End to connect to the Crossrail high-frequency services into London and existing Great Western services providing excellent opportunities for sustainable travel, particularly for commuters.

11. Other sustainable opportunities at a local level include the Buckinghamshire County Council, Wycombe District Council and Sustrans joint priority to bring forward a strategic walking and cycling route from Bourne End to High Wycombe on the former railway line.

12. Elsewhere in the Plan, policies such as CP7 Delivering the Infrastructure to Support Growth specify the sustainable infrastructure required and funding streams to be employed i.e. through planning obligations and the Community Infrastructure Levy to facilitate a targeted way to maximise the sustainable benefits from new development.

13. Policy CP1 links to and supports the eight strategic objectives of the Plan which in turn are individually considered in each of the settlement sections of the Plan where new development is proposed. The Principles for Bourne End and Wooburn for example (Plan page 260) set out clearly the priorities that need to be achieved to meet the district-wide strategic objectives of the Plan. These include protecting areas from development, strengthening the sense of place, fostering economic growth, improving connectivity, delivering new housing and mitigating climate change. Policy CP1, therefore, provides a justified and effective over-arching policy mechanism to deliver sustainable growth over the Plan period.

Q6. 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?

14. The settlement strategy (policy CP3) is underpinned by the Settlement Hierarchy Study Final Report (September 2017 update). The methodology of this study is based on three key areas - population, service provision and accessibility which, in combination, is used to group settlements into a hierarchy. Studies by other LPAs were also reviewed in the development of the methodology to ensure it was tested and compared to already accepted approaches.

15. This is a categorisation that seeks to define the functionality of settlements based on a collective appreciation of the three main methodology areas. Lack of a particular service in any given tier can, for example, be "offset" by good accessibility to that service elsewhere. This gives a necessary level of flexibility in applying the settlement hierarchy.

16. The Hierarchy Strategy is very clear that settlements were classified on the basis of contiguous built-up areas. Some communities may have a perception that they are separate from each other (a point raised by other representors) but in all practical terms, in many cases, they function as a single settlement, including by the way services and facilities are used.

17. The specific level of growth for each settlement tier is not, however, directly defined by the study but by separate assessments relating to, for example, capacity/growth opportunities in individual settlements.

18. This allows for appropriate levels of growth for each tier, but does not necessarily impose similar levels of growth for each tier. This is demonstrated, for example, by the three tier 2 settlements where 2,050 homes are proposed at Princes Risborough, 350 at Marlow and 800 at Bourne End/Wooburn.

19. The level of growth for Bourne End/Wooburn is, therefore, defined by the opportunities for development but also because it is a highly sustainable settlement with a significant range of facilities and services all supported by good accessibility.

20. Housing growth especially at the levels envisaged for some of the higher tiers will also incorporate additional services to supplement and/or add to the facilities in the settlement to reinforce the hierarchy.

21. By directing development to settlements according to their hierarchy it allows for accessible developments, reduces the reliance on car travel particularly for short trips and maximises the opportunities for sustainable travel. The Settlement Strategy in Policy CP3 has been positively prepared, is justified and will, therefore, provide an effective approach to delivering necessary sustainable growth over the Plan period.

Q8. Is the Spatial Strategy sufficiently flexible and can it respond effectively to changing circumstances?

22. The spatial strategy identifies the key parts of the District that can accommodate new development and directs that development to those areas. The opportunities for new development in these areas are drawn from a variety of sources that include regeneration of previously developed land, development on previously identified reserve sites and new allocations (including necessary limited Green Belt release). This provides a diverse range of sites from different sources and introduces sufficient flexibility on how the required development can be accommodated and brought forward.

~~~~~

Planning Works Ltd 29th June 2018.