



Wycombe Local Plan

Statement on Behalf of Richborough Estates Limited (Rep. No. 0954)

Matter 2 - The Plan's Strategy

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

1. Richborough Estates does not have any particular comment about the Vision except to note that, because it is succinct, its content is somewhat generic.

Question 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. Richborough Estates note that Strategic Objective 8 refers to locating development in settlements with the widest range of services and facilities. This objective is supported by Richborough Estates but it has not effectively been translated into the spatial strategy for the distribution of growth, especially housing.

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

3. Paragraph 4.14 of the Local Plan helpfully recognises that *'larger settlements have the widest range of facilities, and the best provision of public transport, and thus present the more sustainable locations for development in the District. By reason of being locations which are, or can be, made sustainable most of the housing development required over the plan period is therefore located in these towns, including a significant amount on brownfield land'*. Strategic Objective 8 explicitly refers reducing CO₂ emissions by reducing the need to travel by private car, including through locating development in settlements with the widest range of services and facilities. This is echoed in Policy CP12 and is consistent with the NPPF which encourages solutions which support reductions in greenhouse gas emissions and reduce congestion.
4. The Spatial Strategy should, therefore, be supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of travel and focuses development in locations which are, or can be made, sustainable. More growth should be directed to the Tier 1 and 2 Settlements.



5. Against this context, Richborough Estates is concerned that Policy CP2 gives too much weight to 'cherishing' or conserving the Chilterns Area of Outstanding Natural Beauty, particularly at Marlow, and this has resulted in excessive growth being proposed at materially less sustainable locations (e.g. Bourne End/Wooburn, Longwick and Great & Little Kimble). Insufficient weight is being given to the delivery of growth at sustainable locations with the widest range of facilities and services, such as Marlow, as is required by Strategic Objective 8, Policy CP12, and paragraph 4.14 of the Local Plan and the NPPF.
6. Richborough Estates recognise that there is a balance to be struck between the 3 dimensions of sustainable development identified in the NPPF. This balancing is particularly applicable to accommodating growth to meet the social and economic needs of the community and the preservation of the landscape and scenic beauty of the AONB.
7. This Statement is not seeking to reduce the importance attached to AONBs, including national policy at paragraph 116 of the NPPF and which is echoed in Policies CP2 and DM30. However, the NPPF does not preclude the possibility of land within the AONB being allocated for development subject to other considerations. Indeed, on appeal the delivery of housing has been demonstrated to be in the public interest and amounts to the necessary exceptional circumstances to justify residential development in the AONB. Accordingly, delivering housing or other growth at sustainable locations, and meeting specific housing needs of residents, should be exceptional circumstances to allow for development within AONBs at sustainable locations.
8. The Council's Area of Outstanding Natural Beauty Site Assessment Report (Document AONB 1) puts scale as the first factor concerning whether a proposed allocation or omission site is likely to result in a major development in the AONB. In the context of the size of Marlow, a development of around 100 dwellings (which is the scale proposed by Richborough Estates at Oak Tree Road), would represent an increase of around 1.5% in this Tier 2 Settlement's housing stock (circa 6,500 dwellings). This scale of development occurring in the AONB cannot be regarded as significant nor amount to a disproportionate increase in the size of Marlow. In the context of relating to the size of Marlow, a residential allocation of 100 dwellings would not be a major addition to the town based upon the ordinary meaning of the word.
9. In supporting this hierarchical approach to the accommodation of growth, Richborough Estates note that the 'scoring' of Marlow in the Settlement Hierarchy Study's Settlement



Audit Matrix is the same as High Wycombe (Tier 1) and Princes Risborough (Tier 2). However, by comparison to the other Tier 1 and 2 Settlements, Marlow's proposed 350 dwellings to be delivered during the plan period, principally on urban sites, does not reflect its role and status as the second largest settlement in the District. As a simple illustration of the point, the following table provides a useful indication of the disconnect between the size of each settlement and the proposed housing provision from Policy CP4 and Topic Paper 1:

Table 1: Housing by Tier 1 and 2 Settlements

Settlement	Proportion of District's Population	Proportion of District Housing Provision
High Wycombe	61.3%	58.1%
Marlow	8.3%	3.2%
Princes Risborough	4.6%	18.7%
Bourne End/Wooburn	4.0%	7.3%

10. To accommodate growth at some of the Principal Settlements it is inevitable that the Green Belt boundary will need amending (see Richborough Estate's Statement for Matter 6). Directing growth to these Principal Settlements is consistent with the NPPF policy towards reviewing Green Belt boundaries where account should be taken of the need to promote sustainable patterns of development. The same logic about delivering growth at sustainable locations should equally apply to larger settlements within the AONB.
11. There is a demonstrable need for growth at the most sustainable settlements (i.e. Tier 1 and 2 settlements) whether to deliver new homes to meet the objectively assessed housing need or provide the jobs to required sustain the local economy. The Spatial Strategy should be amended to promote a higher level of growth at Marlow as an alternative to development occurring at less sustainable locations.

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

12. Richborough Estates does not have any views on this question.

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?*



13. For the reasons which have been given in the response to Question 3, the Spatial Strategy is not effective in delivering growth at sustainable locations. As an example, there can be no dispute that Marlow is the second largest settlement within the District; it contains a wide range of facilities and services; it is an important employment centre with Globe Park being a strategic employment site and it is located on key M40/A404 corridor along which economic growth is to be fostered, including the redevelopment the Globe Business Park to maintain its status as important employment location. Against this context, Richborough Estates consider that there is a disconnect between an effective linking of transportation, employment and housing growth.
14. Appendix 1 of Topic Paper 1 helpfully identifies that there are some 12,250 employees in the settlement of Marlow which is around 14% of the District's total. As have already been recorded in Table 1 above, Marlow contains some 8% of the District's housing stock. This date indicates a potential imbalance between homes and jobs at Marlow.
15. Appendix 1 includes Travel to Work data from the 2011 Census which, although 7-years old, does identify the net imbalance between in and out commuting from Marlow. This data highlights the disconnect between housing and employment development at the second largest settlement in the District which is a sustainable location for growth. Thus, the Spatial Strategy fails to recognise the importance of Marlow as a both an important place to live and a sustainable location for growth and this is contrary to the Local Plan's own Strategic Objectives the Framework.
16. Other factors which have been overlooked in considering a balanced Spatial Strategy are those matters associated with the potential benefits of growth at a particular settlement. Market housing is currently the only realistic means of delivering affordable homes. A scheme of 9 dwellings, such as the only greenfield site proposed at Marlow, is below the threshold for affordable homes. Sites such as the one being promoted by Richborough Estates at Marlow would eb capable of delivering upwards of 40 affordable dwellings. This is against the wider point that the affordability ratio has dramatically changed within Marlow by increasing form 7.29 in 1997 to 17.31 in 2016. Not seeking to meet a housing need at a sustainable location raises basic questions of supply and demand and the implications for house prices within that local housing market and whether the indigenous population (in particular first-time buyers and younger families), or those seeking to relocate for work reasons, can afford to live at Marlow. This would potentially cause an exacerbation of the imbalance of the resident population and jobs, especially



against the context of the strong employment base at Marlow and the aspirations to retain its status.

17. The absence of growth does not enable the available expenditure from the resident population to increase to support existing facilities and services. A hundred dwellings would typically generate around £2.5m additional expenditure on comparison and convenience goods and leisure pursuits. In some locations, a stagnant rather than growing population can mean reduced demand on some services (e.g. schools) and increase demand for others (e.g. healthcare) as the population profile changes.

Question 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?

18. The short answer to the first part of the question is 'no'. For the reasons which have been given, the Settlement Strategy gives insufficient regard to the housing needs of Marlow because too great of an emphasis is being placed upon 'cherishing' and conserving the AONB.
19. The NPPF identifies that encouragement should be being given to solutions which support reductions in greenhouse gas emissions and reduce congestion. Further, the NPPF requires that when reviewing Green Belt boundaries, account is to be taken of the need to promote sustainable patterns of development, including channelling development towards urban areas inside the Green Belt boundary. Spatial Objective 8 seeks to reduce CO₂ emissions through the location of development at locations which reduce the use of the private car and this is echoed in Policy CP12. However, especially at Marlow, the Settlement Strategy will exacerbate patterns of out-commuting and, therefore, fails to accord with these policy principles.
20. The Council's own evidence base contained in the Settlement Hierarchy Study identifies Marlow (Documents SHS1 and 1.1) as the second largest settlement within Wycombe District with an estimated population of circa 14,300 people. Marlow has a dwelling stock of some 6,500 dwellings. In addition, the Study confirms that Marlow has a wide range of retail uses, a good range of services and both bus and rail public transport connections. Marlow is also one of 2 settlements which will directly benefit from Crossrail. The Study demonstrates that in terms of 'Key Services', 'Higher Order Services' and 'Public Transport' Marlow scores the same as High Wycombe (a Tier 1 Settlement).



21. The employment offer at Marlow is a key attribute in terms of this Tier 2 Principal Settlement's merits as a sustainable location for growth and has the potential provide the opportunity to minimise the need to travel (see Appendix 1). The regeneration of Globe Park will maintain Marlow's status, as referred to in the Local Plan, as an important employment location within the Thames Valley. As recognised in Documents SHS1 and 1.1, Marlow has a wide employment offer of 1,650 units, including Globe Park which is the home for some 50 companies and is also part of the Business Improvement District.

22. Richborough Estates is not suggesting or seeking to disregard the physical constraints to growth at Marlow, especially associated with the River Thames floodplain. However, given its sustainable credentials as a location for growth too great an emphasis is being placed on 'cherishing' the AONB with only a planned housing of 350 dwellings with a single new greenfield housing allocation proposed for 9 dwellings. In principle, there should be further growth at Marlow beyond what is proposed in the Local Plan.

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

23. Richborough Estates consider this is a matter for the Council to advise the Inspector.

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

24. The housing requirement cited in Policy CP4 is 10,925 dwellings and the supply in Tables 4 to 6 is stated to be 10,925 dwellings. It will be for Matter 3 to consider the reality of delivering some of the allocations which are being relied upon, particularly at Princes Risborough. However, if some of these sites fail to come forward then there is no obvious flexibility in the Local Plan to accommodate any shortfall.

25. Further, Richborough Estates note that the degree of flexibility to address any shortfall is materially hampered by the current Spatial Strategy and also, to some extent, the Settlement Strategy. This lack of flexibility would be attributable to the current approach of the Council towards the application of Green Belt and AONB policies.



26. Accordingly, in response to the question, Richborough Estates propose that consideration is given to the identification of 'reserve housing' sites at sustainable locations, in particular at Tier 1 and 2 Settlements. These sites, which will inevitably mean land on the periphery of High Wycombe and Marlow, would be consistent with the Framework's requirement that, where necessary, Local Plans should identify safeguarded land removed from the Green Belt to meet long-term. One such site has been proposed by Richborough Estates at Oak Tree Road, Marlow the details for which accompanied the original representations and are summarised in the Matter 6 Statement. Such land can be the subject of an appropriate policy for development in circumstances where a demonstrable shortfall in housing land supply is established to exist. Indeed, the concept of reserved sites is not new because some of the proposed housing in this Local Plan is intended to be delivered on such sites identified in the Core Strategy.

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Appendix 1 – Travel to Work Data for Marlow

- To determine the importance of Marlow as a location for employment, an analysis of the 2011 Census data concerning the location of economically active person's travelling to work and their place of residence identifies that were around 7,985 jobs within Marlow. However, only some 1,297 people (16.2%) both lived and worked within Marlow. The remainder of the people working in Marlow commuted from, in summary:

Usual Residence by District	Number of In Commuters	Percentage of Total
Wycombe District (Other)	2,360	29.6%
Windsor and Maidenhead	976	12.2%
South Oxfordshire	365	4.6%
Wokingham	294	3.7%
Slough	258	3.2%
South Bucks	253	3.2%
Chiltern	196	2.5%
Aylesbury Vale	168	2.1%
Reading	159	2.0%
Bracknell Forest	145	1.8%
London (All Boroughs)	492	6.2%
Other	1,013	12.8%%
Total	7,985	

- Analysis of the 2011 Census data identifies that there were 5,437 people living in Marlow who travelled to work. Some 1,297 of these commuters both lived and worked in Marlow (23.9%). The remainder commuted out of Marlow to, in summary:

Usual Work Place by District	Number of Out Commuters	Percentage of Total
Wycombe District (Other)	1,324	24.4%
Windsor and Maidenhead	568	10.4%
Slough	202	3.7%
South Oxfordshire	156	2.9%
South Bucks	118	2.2%
Chiltern	111	2.0%
Reading	110	2.0%
Wokingham	109	2.0%
Bracknell	95	1.7%
Aylesbury Vale	56	1.0%
London	767	14.1%
Other	524	23.8%
Total	5,437	



3. These tables identify that there was a net in-commuting to Marlow of 2,548 including 1,036 people travelling to work who live elsewhere within Wycombe District. Other than London, there is a net in commuting to Marlow from the surrounding area and this is not sustainable because the trips are principally by private car. These trips add unnecessarily to the traffic congestion which is experienced in the local area, especially along the A404 and at Marlow, where improvements works have been identified as being necessary in this Local Plan (Policy CP7).