

Wycombe District Local Plan Examination

Matter 2 – The Plan’s Strategy

**Bourne End Residents Association & Hawks Hill Widmoor Residents Group
(representation nos 1011 & 1012)**

June 2018

Prepared by: Steve Pickles, BA, MSc, Dip TP, MRTPI

Checked by: Alan Divall, BA (Hons), MRTPI

© West Waddy ADP LLP

This document has been prepared in accordance with West Waddy ADP LLP’s quality control procedures and should be treated as a draft unless it has been signed and approved. The document should not be used for any other purpose than that for which it has been prepared without the written authority of West Waddy ADP LLP. If the document is used for another purpose without consent, then no responsibility or liability for the consequences arising for such action will be accepted by West Waddy ADP LLP.



Matter 2 – The Plan’s Strategy

In relation to matter 2 this written statement focuses on matter 2.6.

Matter 2.6 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?

1.1 The proposed settlement hierarchy, which underpins policy CP3 is not justified and neither will it be effective in delivering sustainable growth. The two key tests required for it to meet these soundness tests of being justified and effective are that:

- i) The evidence base justifies the proposed position in the settlement hierarchy of each of the settlements in the District;
- ii) The evidence base indicates that the settlements will be able to accommodate the amount of sustainable growth which the Council is apportioning to them as a result of their position in the settlement hierarchy.

1.2 Both of these issues are therefore considered in turn.

i) Does the Evidence Base justify the proposed position in the Settlement Hierarchy of each of the Settlements in the District?

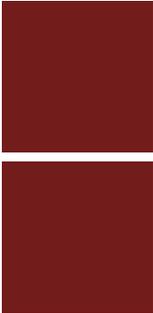
1.3 The evidence base does not justify the proposed position of Bourne End & Wooburn as a Tier 2 Settlement in the settlement hierarchy. Tier 2 settlements are defined as consisting of market towns and other major settlements, which have a large amount of services and facilities, (p12 of The Settlement Hierarchy Study (September 2017)). In the case of Bourne End and Wooburn this is not the case as the Council itself acknowledges in its town centre hierarchy, which classifies Bourne End as a District Centre, stating that *‘these centres provide basic food and grocery shopping facilities, supported by a limited range of other shops and non-retail services serving their local communities.’* (Table 10 The Town Centre Hierarchy p63 of Wycombe District Local Plan (October 2017). This lower status in the retail hierarchy is reflected in the smallness of the car park, which only accommodates 80 spaces, which is far smaller than the car parks in the other two Tier 2 settlements of Marlow and Princes Risborough, which have 745 and 229 car parking spaces respectively. (Pegasus Group Regulation 19 representations on behalf of Keep Bourne End Green.)

1.4 Other key higher order facilities that you would expect to find in a Tier 2 settlement which are missing in Bourne End include that there is no bank or building society; indoor sports



or leisure centre; recycling centre; police station; fire station or a hospital. It also has only one public house within the village centre. The Council itself acknowledges that *'on a strict reading of the criteria, [Bourne End] would fall below this category (as being without an indoor sports centre it does not contain all of the higher-order services),'* (p13 of Settlement Hierarchy Study (September 2017 Update).

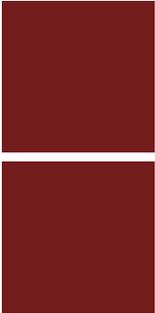
- 1.5 Bourne End and Wooburn is also substantially smaller than the other two Tier 2 settlements of Marlow and Princes Risborough. Indeed, Bourne End (population 6,890) has less than half the population size of Marlow (population 14,325). (p15 of Settlement Hierarchy Study (Sept 2017)) and the Council has itself previously considered that it was more appropriately designed as a Tier 3 settlement as this is the designation it was given in the Core Strategy (adopted 2008).
- 1.6 It is also considered that the hierarchy as currently formulated does not accurately reflect the status of Flackwell Heath which has been given Tier 3 status but is effectively a suburb of High Wycombe being closer to the centre of the town than some other areas that form part of the High Wycombe Urban Area (Tier 1) including Hazlemere; Widmer End; and Wooburn Green. Flackwell Heath contains the Wycombe Campus of the Buckinghamshire College Group; and, in contrast to Bourne End, it also has several public houses spread throughout the village. It is virtually contiguous with Loudwater which also forms part of the High Wycombe Urban Area and is very close to the retail park at Loudwater, which includes a Tesco Superstore.
- 1.7 Flackwell Heath is also in close proximity to the new large Sports Centre, which includes an Olympic size swimming pool at Handy Cross. Handy Cross is also the home of the new Transit Hub that is home to the park and ride facility for Wycombe, and is the major bus coach terminal, which has National Coaches and therefore easy access to many connections. Flackwell Heath therefore has good access to the services associated with the High Wycombe urban area.
- 1.8 Flackwell Heath also has more bus service connections than Bourne End (22 compared to 16) and it also has a direct bus service to the now only major hospital (Stoke Mandeville) that serves both Bourne End and Flackwell Heath, which Bourne End does not.
- 1.9 The Council has included its assessment of individual settlements in Appendix E. According to these tables the services and facilities in Bourne End/ Wooburn and Flackwell Heath are virtually identical. Bourne End/Wooburn have a secondary school which Flackwell Heath does not and it describes the accessibility for Bourne End/Wooburn as being 'good' and that for Flackwell Heath as being only 'fair.' However, this does not take account of the proximity of Flackwell Heath to nearby facilities or the presence of the Wycombe Campus of Buckinghamshire College in Flackwell Heath.
- 1.10 In summary therefore the Council's assessment of the Settlement Hierarchy is not robust or a sound assessment on which to assess the relative positions in the settlement



hierarchy of Bourne End/Wooburn or Flackwell Heath. In particular, it completely fails to take account of the proximity of Flackwell Heath to a broad range of facilities just outside but in close proximity to Flackwell Heath including the retail park at Loudwater which includes a Tesco's superstore.

li) Does the evidence base indicate that the settlements will be able to accommodate the amount of sustainable growth which the Council's is apportioning to them as a result of their position in the settlement hierarchy?

- 1.11 A possible counter argument to the case made above about the settlement hierarchy is that it is immaterial whether Bourne End/Wooburn continues to be a Tier 3 settlement as was the case in the Core Strategy or whether it becomes a Tier 2 settlement as is currently proposed in the submission Local Plan. This ignores, however, the fundamentally different approach that the Council has taken as to the amount of development that is to be allocated to these two tiers in the settlement hierarchy.
- 1.12 Policy CP2 on the Overall Spatial Strategy states that *'The Council will, through the allocations and policies in this plan:b) Direct broadly 85% of the housing requirements and most new employment land to the four larger settlements of the District (Tiers 1 and 2 of the settlement hierarchy), taking into account their relationship to the Area of Outstanding Natural Beauty and Green Belt, and their infrastructure constraints and opportunities;'* but *'c) Direct broadly 15% of the housing requirement to the villages and limited new employment land, and facilitating rural enterprise and diversification to foster their social and economic well-being (Tiers 3 – 6 of the Settlement Hierarchy).'*
- 1.13 A direct consequence of this approach of allocating the bulk of development to settlements in Tiers 1 and 2, including Bourne end and Wooburn is the proposed allocations at Slate Meadow (150 dwellings) and Hollands Farm (467 dwellings) under Policies BE1 and BE2.
- 1.14 The Tier 2 settlement status proposed for Bourne End implies that there are significant development opportunities. However, this is not the case as it is constrained by substantial areas being in the flood plains associated with the rivers Wye and Thames and the Green Belt. The two sites that the council are proposing to allocate at Hollands Farm and Slate Meadow are subject to substantial constraints with the former being an important area of Green Belt; adjoining the Riversdale and Hedsor Road Conservation Area which would be detrimentally affect by the proposed development; and with no suitable accesses having been identified. Both sites are subject to a significant level of flood risk. The current proposals under policies BE1 and BE2 would therefore have a significantly detrimental environmental effect as set out in the Bourne End Residents Association and Hawks Hill Widmoor Residents Group representations relating to these sites.
- 1.15 The NPPF states that *'to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to*



sustainable solutions,' (para 8). By directing large scale development to Bourne End/Wooburn where there are significant environmental constraints and only limited local services to meet the communities needs, the proposed settlement hierarchy would not deliver sustainable growth. It is not therefore justified; nor effective and is not consistent with national policy.

- 1.16 The development that has been allocated to Bourne End/Wooburn could potentially be allocated to a neighbouring district under the Duty to Co-operate and this should have been explored during the preparation of the Local Plan and the reason that this did not happen was that the Flood Risk Sequential Test was only applied very late in the process after the site allocations had already been decided upon as set out in the Bourne End Residents Association & Hawks Hill Widmoor Residents Group written statement on the Duty to Co-operate. Alternatively or in addition potentially land could be allocated for development at Flackwell Heath, which although like Bourne End is surrounded by Green Belt is not in an area of high flood risk and therefore should be viewed preferentially in terms of the application of the Sequential Test.

Conclusion

- 1.17 It is therefore considered that the proposed settlement hierarchy as it relates to Bourne End/Wooburn is not justified; nor effective and is not consistent with national policy. Bourne End and Wooburn should be re-designated as a Tier 3 settlement as it only has a small town centre car park; has relatively limited facilities and has limited development opportunities, due to flood plain; Green Belt and other constraints. Its proposed designation as a Tier 2 Settlement is not therefore justified.
- 1.18 Flackwell Heath should be re-designated as part of the Wycombe Urban Area (Tier 1) as it is closer to the town centre and its facilities than some settlements that already form part of this settlement, and has easy access to associated services, such as the retail park at Loudwater and the sports centre and Transit Hub at Handy Cross.
- 1.19 This is necessary as the current strategy is not justified as it does not form the most appropriate strategy when considered against the reasonable alternatives.