



## **Wycombe District Local Plan Examination**

### **Matter 2: The Plan's Strategy**

**June 2018**

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

- 1.1 The Plan's vision is the same vision that is set out in the Sustainable Community Strategy (SCS) for Wycombe District<sup>1</sup>. As both documents are long term expressions of how we want to see the District develop and change in the future, it is important that they are aligned.
- 1.2 Whilst a high level vision, the SCS includes place specific visions. These could have been included in the Plan's vision but it was decided to develop these further through the Plan's objectives and the "Principles" for the main places in the District set out at the beginning of the site specific policies for different places (e.g. High Wycombe, Marlow, Princes Risborough etc.), in Chapter 5 of the Plan. The overarching vision therefore needs to be read alongside the objectives and place specific principles to understand what the Council is seeking to achieve through the Plan and to understand the spatial expression of the vision.
- 1.3 Whilst the overall vision statement is quite generic, being *the* place (as opposed to *a* place) to live work and visit is ambitious – it means we want Wycombe to be the best place for its residents, people who come to visit, and people who come to work here. The detail in the Plan that follows seeks to help achieve this.

## **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?**

- 2.1. The Plan's objectives, together with the core planning principles in the NPPF, combine to deliver sustainable development in Wycombe District. They are locally specific and they focus on the key economic (objectives 3, 4, 5 and 7), social (objective 6) and environmental

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<sup>1</sup> CORP2 Sustainable community strategy for Wycombe District 2013-2031

(objectives 1, 2 and 8) issues that contribute to delivering sustainable development in the District.

- 2.2. The objectives have been positively prepared, coming out of the Plan preparation process. They take account of, and seek to address, the key issues and challenges identified in Chapter 2 of the Plan including issues that have been identified during the Regulation 18 engagement stage<sup>2</sup>. They recognise the Chilterns as the major asset of the District, but also recognise and seek to address a major community concern about the adequacy of infrastructure provision across the District at both a strategic and local level. They have concern for the global challenge of climate change and what can be done locally to help play our part. They highlight the importance of delivering housing and economic growth within the Wycombe context but also highlight the critical importance of place making and local infrastructure delivery to ensure that growth is genuinely sustainable in the local context.
- 2.3. They are justified because it is the role of Local Plans to set out how, through the land use planning system, issues of sustainable development can be addressed and to grapple with these strategic issues at a local level. They are underpinned by an evidence base supporting the Plan and have regard to other strategies, plans and projects affecting the area<sup>3</sup>. They represent the most appropriate strategy, as they are both locally based but also address the different strands of sustainable development. Failure to include objectives or remove certain objectives would undermine the effectiveness of the Plan to deliver sustainable development and the Plan's vision.
- 2.4. They are capable of delivering the vision because, to be economically strong, it is necessary to not only foster economic growth through land use planning, but also to maximise the opportunities for the economy of the District's location by improving strategic connectivity and local

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<sup>2</sup> See section 4 of TP1 Topic Paper 1 The Strategy

<sup>3</sup> See for instance paragraphs 1.17 – 1.18 of WDLP1 Wycombe District Local Plan

infrastructure as well as delivering houses to increase the local labour force, and through improving our town centres.

- 2.5. To be the place to live, work and visit, means not just being economically strong but also strengthening the sense of place, protecting and enhancing the environment and making sure new development is high quality.

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

- 3.1 Topic Paper 1 sets the NPPF context for the Plan's Strategy (section 2) and section 5 explains the overall strategy, including the overall scale of growth and the spatial distribution, and why it is sustainable.
- 3.2 Paragraph 4.9 of the Plan explains that the spatial strategy is driven by 3 factors:
- Our Location – in the Chilterns AONB and Metropolitan Green Belt;
  - Our Connections – road and rail;
  - Our Settlements – their facilities and infrastructure constraints and opportunities.
- 3.3 NPPF paragraph 14 sets out the presumption in favour of sustainable development in a local plan context. In a Wycombe context, whilst the starting point has been to try to meet the objectively assessed needs, the adverse impacts of doing so in Wycombe District would, in the Council's view, significantly and demonstrably outweigh the benefits when assessed against the NPPF. In addition there are specific policies in the NPPF, as set out in footnote 9 ('footnote 9 constraints'), that apply to Wycombe District that mean that development should be restricted.

- 3.4 Over 75% of the District is covered by footnote 9 constraints. These consist primarily of the Chilterns AONB and the Green Belt. However there are other footnote 9 constraints including Special Areas for Conservation (SACs), SSSIs, designated heritage assets and locations at risk of flooding<sup>4</sup>.
- 3.5 The scale of the objectively assessed need however has meant that the Council has still tested the scope for accommodating development within some of these footnote 9 constraint areas. In particular, working with its strategic partners and authorities within the housing market area, it has tested the scope for development within both the Green Belt (in the context of NPPF paragraphs 79-86)<sup>5</sup> and the AONB (in the context of NPPF paragraphs 115-116)<sup>6</sup>.
- 3.6 The assessment of the scope for development in the Green Belt and AONB was part of a wider testing of options for development through the evidence base, including the HELAA and more detailed assessment reports, and brought together in the assessment of options for different levels of growth in the Sustainability Appraisal<sup>7</sup>. The overall conclusion was that the full objectively assessed need could not be met because to do so would result in adverse impacts that significantly and demonstrably (through the evidence base) outweigh the benefits, and due to the footnote 9 constraints<sup>8</sup>.
- 3.7 As a result Policy CP2(1)(a) makes clear the Plan meets as much of the District's housing and employment land needs as it is sustainable (in the context of NPPF paragraph 14) to do so.
- 3.8 However, through the Duty to Cooperate, the Council has worked collaboratively with the other authorities in the housing market area and secured clear outcomes in relation to both agreeing the scale of unmet

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<sup>4</sup> See paragraph 3.2 and footnote 8 of TP1 Topic Paper 1 The Strategy, placing the District in the top 10% of authorities in terms of the extent of Green Belt, AONB and SSSIs nationally.

<sup>5</sup> See Council's response to Matter 6

<sup>6</sup> See AONB1 Area of Outstanding Natural Beauty Site Assessment Report

<sup>7</sup> See sections 4 and 5 of WDLP2 Sustainability Appraisal of the Publication Wycombe District Local Plan and Table 11 of the same document, pp. 46-47

<sup>8</sup> For further detail see paragraphs 5.9-5.22 TP1 Topic Paper 1 The Strategy

need and agreeing the means by which it will be accommodated<sup>9</sup>. This is the type of strategic planning envisaged in NPPF paragraphs 178 – 181 and is a spatial strategy that has been positively prepared in accordance with NPPF paragraph 182 in relation to meeting needs and addressing unmet needs in a manner consistent with achieving sustainable development.

- 3.9 The broad spatial distribution of growth set out in Policy CP2(1)(b-c) builds on the considerations set out above of trying to meet needs but within a constrained environment, but also factors in the sustainability of settlements – their facilities and infrastructure – in the form of the settlement hierarchy<sup>10</sup>.
- 3.10 In summary however, Policy CP2 directs around 85% of housing growth and most new employment land to the four most sustainable locations for growth in the District – the Tier 1 and 2 settlements of High Wycombe, Marlow, Princes Risborough and Bourne End. The assessment of spatial distribution options in the Sustainability Appraisal<sup>11</sup> leading to the preferred option set out in CP2, supported by the detailed evidence base referred to above, is consistent with the principles of sustainable development set out in the NPPF, including the core planning principles<sup>12</sup>.

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

- 4.1 Yes. The Plan responds to infrastructure providers' strategies and proposals in a variety of ways in accordance with paragraphs 157 and 162 of the NPPF.
- 4.2 The Council has worked extensively with the various infrastructure and service providers over the last number of years to assess the

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<sup>9</sup> See Council response to Matter 1 Q1-4, and paragraphs 5.23-5.25 of TP1 Topic Paper 1 The Strategy, and WDLP8 Wycombe District Local Plan and the Duty to Cooperate Report

<sup>10</sup> See Council's response to Question 6 of this Matter for more detail

<sup>11</sup> See WDLP2 Sustainability Appraisal Publication Version

<sup>12</sup> NPPF paragraph 17

infrastructure requirements to support the growth outlined in the Plan so that it can be delivered sustainably.

- 4.3 At the regional/county level, key documents and strategies that have informed the Plan and accompanying Infrastructure Delivery Plan (IDP) are the Bucks Strategic Economic Plan produced by the Bucks Thames Valley Local Enterprise partnership and Local Transport Plan 4. The plan is also informed by the Buckinghamshire Health and Wellbeing Strategy. Buckinghamshire County Council (BCC) are currently leading on the production of a Buckinghamshire Strategic Infrastructure Plan that will summarise the main infrastructure requirements to support growth across the county.
- 4.4 There are key national and regional transport projects that may have knock on effects in Wycombe District including:
- HS2 which cuts through the very northern tip of the district but with construction routes potentially through High Wycombe and Princes Risborough;
  - East West rail which will improve rail links from Princes Risborough to Aylesbury and will provide a new direct connection to Milton Keynes;
  - Crossrail which will improve connections to central London from Maidenhead which has branch connections to Bourne End and Marlow; and
  - Highways England work feeding into the next Route Investment Strategy (RIS2), including looking at improving access to High Wycombe and improvements at junctions on the A404 south of High Wycombe.

- 4.5 A review of plans and projects was undertaken as part of the Sustainability Appraisal<sup>13</sup> when assembling baseline information at the start of the plan.
- 4.6 To support the Local Plan the Council and its infrastructure partners have undertaken a significant range of technical studies that informed site specific allocations and the infrastructure planning process<sup>14</sup>. These technical documents and assessments as well as the significant consultation and ongoing engagement with the infrastructure providers<sup>15</sup> throughout the plan and evidence preparation meant that the spatial strategy responds to the infrastructure needs of the area:
- Policy CP7 “Delivering the infrastructure to support growth” sets out the key infrastructure requirements necessary to support growth, and specify that the Council will deliver infrastructure provision through on site provision as well as planning obligations, the Community Infrastructure Levy and other funding streams where appropriate. The Council’s Community Infrastructure Levy will be used in a targeted way to maximise benefits.
  - Specific policies set out on-site requirements for infrastructure provision, notably at Princes Risborough major expansion (PR7 and PR17) and on strategic sites (HW5 – HW8, HW16, BE2).
  - The Infrastructure Delivery Plan<sup>16</sup> provides more details.
- 4.7 The planned growth is in turn reflected in the providers’ own strategies going forward such as water resource management plans, school places planning, health provision planning. See the Infrastructure Delivery Plan for more details.

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<sup>13</sup> See Appendix II of WDLP2 Sustainability Appraisal Publication Version

<sup>14</sup> A summary of these can be found in Section 3 of TP5 Topic Paper 5 Infrastructure

<sup>15</sup> See Section 4 of TP5 Topic Paper 5 Infrastructure.

<sup>16</sup> WDLP5 Local Plan Publication Version Infrastructure Delivery Plan

- 4.8 The National Infrastructure Commission work on the Oxford to Cambridge growth area and the associated provision of an “expressway” connecting the two university towns is likely to have an impact on the north of Buckinghamshire in particular. The route of the proposed expressway will have an impact on how the north-south road connectivity issues might be addressed in the future with implications for the District as LTP4 rightly identifies north-south connectivity as an issue. The proposed third runway at Heathrow is also likely to have wider implications that could also impact on the District.
- 4.9 Both these key strategic projects have yet to reach final decisions and their impacts on the District are yet to be established. As such, the implications for the District cannot be factored in this Plan and are matters that would need to be addressed at a future Plan review.

## **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?**

### ***Positively prepared***

- 5.1 As noted in response to Question 3, the starting point for preparing the Plan was to seek to meet the objectively assessed development and infrastructure requirements of the area. That response, the Strategy Topic Paper<sup>17</sup> and the Consultation Statement<sup>18</sup> explain the extensive preparation process of the Plan including the testing of often difficult options to try to meet the objectively assessed needs of the area. The Sustainability Appraisal tested not just spatial options but also different levels of growth for the District, including levels of housing growth that met and also exceeded the objectively assessed need<sup>19</sup>. This process of testing was supported by an extensive but proportionate evidence base.

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<sup>17</sup> Paragraphs 4.4-4.18 of TP1 Topic Paper 1 The Strategy

<sup>18</sup> WDLP10 Statement of Consultation and WDLP10.1-22 Statement of Consultation appendices 1-22

<sup>19</sup> See Table 11 in WDLP2 Sustainability Appraisal Publication Version, pp. 46-7

- 5.2 However, a key factor in determining both the overall level of growth and its spatial distribution is the existence of major planning and environmental constraints, notably the Green Belt and AONB which together cover over 75% of the District. As explained in response to Q3 and as set out in Policy CP2, the Plan therefore meets as much of the objectively assessed need as is sustainable to do so. There is agreement across the Bucks planning authorities about how the unmet housing needs should be accommodated, and they are proposed to be accommodated within the Housing Market Area in a sustainable way.
- 5.3 As such NPPF paragraph 182 “positively prepared” is satisfied in the way that objectively assessed needs and unmet needs are addressed.

### ***Justified***

- 5.4 Strategic alternatives were assessed, both for the overall level of growth and the spatial distribution of that growth in the Sustainability Appraisal. Section 4 of the Sustainability Appraisal<sup>20</sup> sets out how the reasonable alternatives were developed leading to the assessment of 5 strategic reasonable alternatives testing 4 overall levels of housing growth and five different distributions. Alternative options for the growth of Princes Risborough and Kimble were also assessed. These alternatives are underpinned by a proportionate evidence base that has fed into those alternatives. That evidence base is explored further in relation to other Matters and Questions that the Council is responding to. Similarly, spatial alternatives were also tested for employment land.
- 5.5 Section 5 of the Sustainability Appraisal sets out the appraisal of the alternatives and section 6 sets out the preferred approach and hence what is considered to be the most appropriate strategy.
- 5.6 As discussed in relation to Q3 and expressed in Policy CP2(1)(a), having regard to NPPF paragraph 14, the Plan meets as much of the development needs as possible without any adverse impacts

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<sup>20</sup> See sections 4 and 5 of WDLP 2 Sustainability Appraisal Publication Version and in particular Table 11 of the same document, pp. 46- 47

significantly and demonstrably outweighing the benefits and taking into account specific footnote 9 constraints. As such it is considered to be the most appropriate strategy, both in terms of overall quantum of development and its distribution, when considered against the reasonable alternatives.

### **Effective**

5.7 This is discussed further in relation to (a) below.

### **5a. Does the Plan's Spatial Strategy represent an effective approach to delivering sustainable development (Policy CP1) over the Plan period?**

5.8 The Plan's strategy is an effective approach to delivering sustainable development for a number of reasons:

5.9 The Plan's proposals that make up the strategy are themselves deliverable. The Council's response to other Matters and Questions, including Matters 3, 4, 6 and 7-10 will demonstrate that the development proposals in the Plan are both suitable and deliverable/developable. Careful consideration of the timing of the delivery of development, informed by engagement with developers/landowners and other evidence based work means that sustainable development will be delivered across the plan period, including maintaining a rolling 5 year supply of housing land across the plan period.<sup>21</sup>

5.10 As well as identifying deliverable/developable sites the Plan also seeks to protect and enhance important environmental assets, through relevant development management policies and areas identified on the policies map. This is also an important component of delivering sustainable development.

5.11 As outlined in the Council's response to Q1-4 on Matter 1 and in the Duty to Co-operate statement<sup>22</sup>, the plan is based on effective joint

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<sup>21</sup> See the Council's response to Question 4 Matter 3

<sup>22</sup> WDLP8 Duty to Cooperate Report

working, particularly at a housing market area level, to ensure objectively assessed needs for development and infrastructure are addressed.

- 5.12 Finally, Policy CP1(2) expects development itself to contribute to delivering sustainable development. The Plan delivers sustainable development through the application of the more detailed policies in the Plan, including the development management policies to guide day-to-day decisions on planning applications, and site specific policies to ensure that development of each allocated site makes its contribution.

### **5b. What are the key components of the Plan's Spatial Strategy and how do they interact?**

- 5.13 Paragraph 5.8 of the Strategy Topic Paper<sup>23</sup> notes that there are a number of factors that, when brought together, make up the spatial strategy. They are:

- The need for development – housing, economic development and infrastructure. This is the starting point;
- The environmental and planning constraints of the District including the extensive footnote 9 constraints;
- Infrastructure constraints, often themselves constrained due to environmental constraints;
- Market considerations – the deliverability of the required development;
- The broad sustainability of locations for development – summarised in the settlement hierarchy.

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<sup>23</sup> TP1 Topic Paper 1 The Strategy

5.14 Ultimately these combine to give a spatial strategy set out in Policies CP2 and CP3 which:

- Meets as much of the development needs as is sustainable to do so, taking account of major constraints such as Green Belt and AONB, and the adverse impacts of development;
- Focuses most development on the two highest tiers of settlements, with by far the most development focused on the Tier 1 settlement of High Wycombe, and the next most development at Princes Risborough where the footnote 9 constraints are less.

5.15 The different factors outlined above interact in producing the overall strategy. For instance:

- The footnote 9 and other constraints influence the overall scale of growth, the starting point for which is the assessed need;
- The market considerations influence the assessed scale of need as set out in the HEDNA<sup>24</sup>, but also affect the potential location of development (especially economic development) and the timing of delivery (for instance the rate of development of the Princes Risborough expansion area);
- The footnote 9 and other constraints interact with the settlement hierarchy and infrastructure constraints to shape the distribution of development set out in Policies CP2 and CP3. For instance the multiple footnote 9 constraints around Marlow result in low levels of development for the second largest town in the District. Conversely, the relative lack of constraints on the western side of Princes Risborough provide scope for much larger scale growth;

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<sup>24</sup> See HEDN2 Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA) Update 2016 - Addendum Report and HEDN3 Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA) Update 2016 - report of findings

- Infrastructure constraints and the time taken to overcome those constraints affect the overall scale of development that can be delivered at Princes Risborough within the plan period, and hence the overall housing requirement for the District.
- Levels of infrastructure are also a key element of the assessment of the settlement hierarchy and hence are a major influence on the distribution of growth.

### **5c. Does the Plan's Spatial Strategy effectively link transportation, employment and housing growth?**

- 5.16 The Spatial Strategy clearly makes the links between employment and housing growth both in terms of the overall level of growth and in the spatial distribution of growth.
- 5.17 In terms of overall growth, the Plan, which does not meet either the full OAN for housing or the full Oxford Economics forecasts, takes a broadly balanced approach between housing and economic growth. This avoids an imbalance, whereby for example, full economic forecasts are met but not the housing OAN. In evidence terms, the HEDNA makes the links between housing and employment growth, with consideration of an uplift to the housing OAN due to employment growth being one step in calculating the housing OAN. In the case of Wycombe District the uplift required for balancing housing and employment is less than the 20% uplift for market signals and so no additional uplift is required for employment growth<sup>25</sup>.
- 5.18 In terms of the link between housing and employment in the spatial distribution, paragraph 5.27 and Table 1 of Topic Paper 1 compare the housing and employment proposals for the main settlements and settlement tiers. It demonstrates a strong correlation between the level of proposed housing growth and new economic development. In particular:

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<sup>25</sup> See the Council's response to Matter 3 Q1

- By far the highest level of both housing growth and new economic development is focused on the High Wycombe urban area;
- Tiers 1 and 2 settlements are proposed to accommodate over 85% of the housing growth and most of the economic development;
- Just under 20% of the housing growth and 20% of new employment land is proposed at Princes Risborough.

5.19 There are strong links between where housing and economic development is proposed and the transport network with most growth being proposed at High Wycombe, Princes Risborough and Bourne End. In transportation terms this makes sense.

5.20 At High Wycombe there are:

- Good rail connections with a frequent fast service to London and Birmingham and new connections to Oxford with further improvements in terms of links to Milton Keynes via Aylesbury;
- A good local bus network;
- Whilst it is the most congested part of the network in the District, there is also good connectivity to London via the M40 and south to the Thames Valley via the A404. That connectivity is being considered further by Highways England as part of their next round of potential investment.

5.21 Princes Risborough

- Good rail connections to London, Birmingham and connections to Oxford with connections to Milton Keynes via Aylesbury planned;
- Good inter urban bus service, notably High Wycombe to Aylesbury;
- Road connections strategically are less strong.

## 5.22 Bourne End

- Rail connections to Marlow and Maidenhead (and thence to London Paddington) with a proposed more frequent service;
- Regular (2 x per hour) bus service between High Wycombe and Maidenhead;
- Local congestion issues on the road network.

5.23 The link between transport infrastructure and new housing and employment growth is less strong at Marlow where good access to the strategic road network and to public transport is not complemented by large scale housing and employment growth due to the high level of environmental and planning constraints around the town.

5.24 The Plan, supported by the Infrastructure Delivery Plan<sup>26</sup>, proposes improvements to the local road network. These focus on areas of greatest growth. They include a package of improvements to the London Road in High Wycombe, a new relief road at Princes Risborough to support the growth there, and a new link road in Bourne End.

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

- 6.1 The response to Question 5 explains how the broad distribution of development in Policies CP2 to CP4 is justified, through the interaction of a number of factors. This includes through the settlement hierarchy.
- 6.2 The settlement strategy is positively prepared, setting out the role of the main settlement and settlement tiers in helping to meet the development needs of the District. The role of the different settlements varies depending on the interaction of the different factors discussed in response to Q5.

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<sup>26</sup> WDLP5 Local Plan Publication Version Infrastructure Delivery Plan

- 6.3 The settlement strategy is both justified and effective because it is based on a proportionate evidence base that has assessed the scope for development across the District and at all the main settlements of the District. It also draws on feedback from the regulation 18 engagement on the Plan. The site assessment process, brought together in the HELAA, but drawing on various other more detailed assessments of site options in different locations and on different types of sites together with associated deliverability, viability and feasibility evidence means that CP3 will be effective in delivering sustainable growth. This more detailed site work feeds into the more detailed criteria in the policy which set out the varying scope for different settlements and tiers in the hierarchy to accommodate growth.
- 6.4 The robustness of this evidence and the testing of associated spatial distributions of growth, and levels of growth in particular locations in the Sustainability Appraisal<sup>27</sup>, ensure that the settlement strategy is the most appropriate strategy when considered against the reasonable alternatives, based on a proportionate evidence base.
- 6.5 In relation to the detailed wording of Policy CP3, as submitted there is an unintended difference in the terms of different parts of this policy as they apply to different tiers of settlements.
- Tier 1 (High Wycombe) – the policy allows for development within the built-up area *including* suitable PDL
  - Tier 2 (Princes Risborough, Marlow, Bourne End and Wooburn) – the policy allows for development ‘on suitable PDL within the built-up area’
  - Tier 3 and 4 (Higher order villages) – in effect as with Tier 1 - the policy allows for development within the settlement boundary, with no PDL criteria.

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<sup>27</sup> See sections 4 -6 of WDLP2 Sustainability Appraisal Publication Version

6.6 The Council did not intend to restrict development to PDL only in Tier 2 settlements as a matter of principle. However, on a strict reading of the Tier 2 policy, development on non-PDL within the built-up area, which would include residential gardens, would conflict with this policy. Whilst this is a strategic policy, and proposed policy DM21 (The Location of New Housing) does not distinguish between PDL and non-PDL, it is considered on reflection that, to ensure that CP10 is positively prepared, that the Tier 2 policy should be modified as per Tiers 1, 3 and 4 i.e. “including suitable PDL” in place of “on suitable PDL” in each of CP3(2)(a), (b) & (c).

### **6a. How has the settlement hierarchy been defined and what level of growth is proposed for each tier?**

6.7 The methodology for defining the hierarchy in the Settlement Hierarchy study<sup>28</sup> was undertaken through the following stages:

- Stage 1: Define settlements and establish population size<sup>29</sup>
- Stage 2: Audit of key service provision and identification of higher-tier settlements<sup>30</sup>
- Stage 3: Audit of accessibility<sup>31</sup>
- Stage 4: Construction of hierarchy, along with qualitative assessment and validation

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<sup>28</sup> SHS1 Settlement Hierarchy Study Final Report

<sup>29</sup> A minimum population threshold of 100 was established for the classification of a ‘settlement’ for the purpose of the study. This excluded the areas of Northend, Turville, Berghers Hill, and Southend.

<sup>30</sup> The key services appraised were the presence of a: post office, food shop, primary school, GP surgery, public house, village/community hall, recreation ground/playing field, access to high-speed broadband. The process for assessing these are set out in SHS1 Settlement Hierarchy Study, pp. 28-30.

<sup>31</sup> This considered the proximity to a higher-tier settlement as well as provision of public transport. Public transport was scored into categories of Good, Fair, Limited, or None. The criteria for these can be found in SHS1 Settlement Hierarchy Study, pp. 8-9.

6.8 Following the application of this methodology, the following tiers were established<sup>32</sup>:

- Tier 1: Large Urban Area (High Wycombe)
  - The largest town in the District. Has much greater range of services and facilities than any other settlement.
- Tier 2: Market Towns and Other Major Settlements (Marlow, Princes Risborough, Bourne End/Wooburn)
  - Other towns and larger settlements, whilst smaller than High Wycombe, have a large amount of services and facilities and widest public transport offer.
  - Bourne End/Wooburn, whilst lacking an indoor sports centre, offers all other higher-order services as well as being an employment and retail centre of large population. The proximity of Bourne End to the full range of services in High Wycombe, Maidenhead, and Marlow makes it more appropriate to classify it as a Tier 2 settlement rather than Tier 3.
- Tier 3: Higher-order Service Villages (Flackwell Heath, Stokenchurch, Naphill/Walters Ash, Marlow Bottom and Lane End)
  - Settlements, whilst smaller than the Market Towns and other Major Settlements, are the largest villages in the District with a population of over 2,000, access to all or almost all key services and other services.
- Tier 4: Other service centres (Hughenden Valley, Great Kingshill, Lacey Green/Loosley Row, West Wycombe, Longwick, and Great and Little Kimble)

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<sup>32</sup> Appendix 1 of this Matter lists all the settlements in each tier

- Settlements with a population of over 1,000 which have most of the key services but are less well-served by other services.
- Tier 5: Small villages
  - Settlements which typically have around half of the key services (including primary school) and very few or no higher-order services.
- Tier 6: Hamlets
  - Remaining settlements from the study, defined as hamlets or hamlet groupings. Settlements have few key services and do not have a primary school. Most have limited public transport provision.

6.9 The full breakdown of the settlement hierarchy can be found in Appendix 1. Detailed settlement audits and findings can be found in the Settlement Hierarchy report and relevant appendices<sup>33</sup>.

6.10 The proposed level of growth for these identified settlements is set out in Policy CP4 – Delivering homes and CP5 – Delivering land for Business. A summary of growth for housing, employment, and retail is outlined in Table 1 below<sup>34</sup>:

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<sup>33</sup> See SHS1 Settlement Hierarchy Study and SHS1.1 Settlement Hierarchy Study Appendix E Detailed Settlement Audits and Boundary Maps

<sup>34</sup> Table 1 Comparison of Scale of Housing and Economic Development for Main Settlements and Settlement Tiers in TP1 Topic Paper 1, The Strategy, p. 25

Table 1 Settlement growth proposals

Settlement Tier(s)	Housing growth proposed <sup>35</sup>	% District total (housing growth)	Employment growth proposed	% District total (employment growth)	Retail growth proposed
<b>Tier 1</b> <b>High Wycombe Urban Area</b>	<b>6,341</b>	<b>58%</b>	<b>81,000 sq m of B use class in Allocations.</b>	<b>73%</b>	<b>14,200 sq m in retail allocations.</b>
Tier 2 Marlow	345	3%	No new B use class employment land allocations proposed.	N/A	No new retail allocations proposed.
Tier 2 Princes Risborough	2,047 <sup>36</sup>	19%	22,500 sq m B use class employment in allocations.	20%	2,300 sq m in retail allocations.
Tier 2 Bourne End and Wooburn	798	7%	No new B use class employment land allocations proposed.	N/A	No new retail allocations proposed.
<b>Tier 2 Total</b>	<b>3,190</b>	<b>29%</b>	<b>22,500 sq m B use class employment in allocations.</b>	<b>20%</b>	<b>2,300 sq m in retail allocations.</b>
<b>Tiers 3</b> <b>Higher order villages</b>	<b>465</b>	<b>4%</b>	<b>7,500 sq m B use class employment in allocations.</b>	<b>7%</b>	<b>No new retail allocations proposed.</b>
<b>Tier 4</b> <b>Other service centres</b>	<b>484</b>	<b>4%</b>	<b>No new B use class employment land allocations proposed.</b>	<b>N/A</b>	<b>No new retail allocations proposed.</b>
<b>Tiers 5</b> <b>Small Villages</b>	<b>123</b>	<b>1%</b>	<b>No new B use class employment land allocations proposed.</b>	<b>N/A</b>	<b>No new retail allocations proposed.</b>
Tier 6 Hamlets	312	3%	No new B use class employment land allocations proposed.	N/A	No new retail allocations proposed.

<sup>35</sup> See Table 9 of TP2 Topic Paper 2 Housing, p. 67

<sup>36</sup> This applies only to the period 2013-2033 as 599 of the total planned homes are expected to be delivered after the plan period.

Rural Areas	12	1%	No new B use class employment land allocations proposed.	N/A	No new retail allocations proposed.
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## 7. How many Neighbourhood Plans are there in the Wycombe, where are they and what is their status?

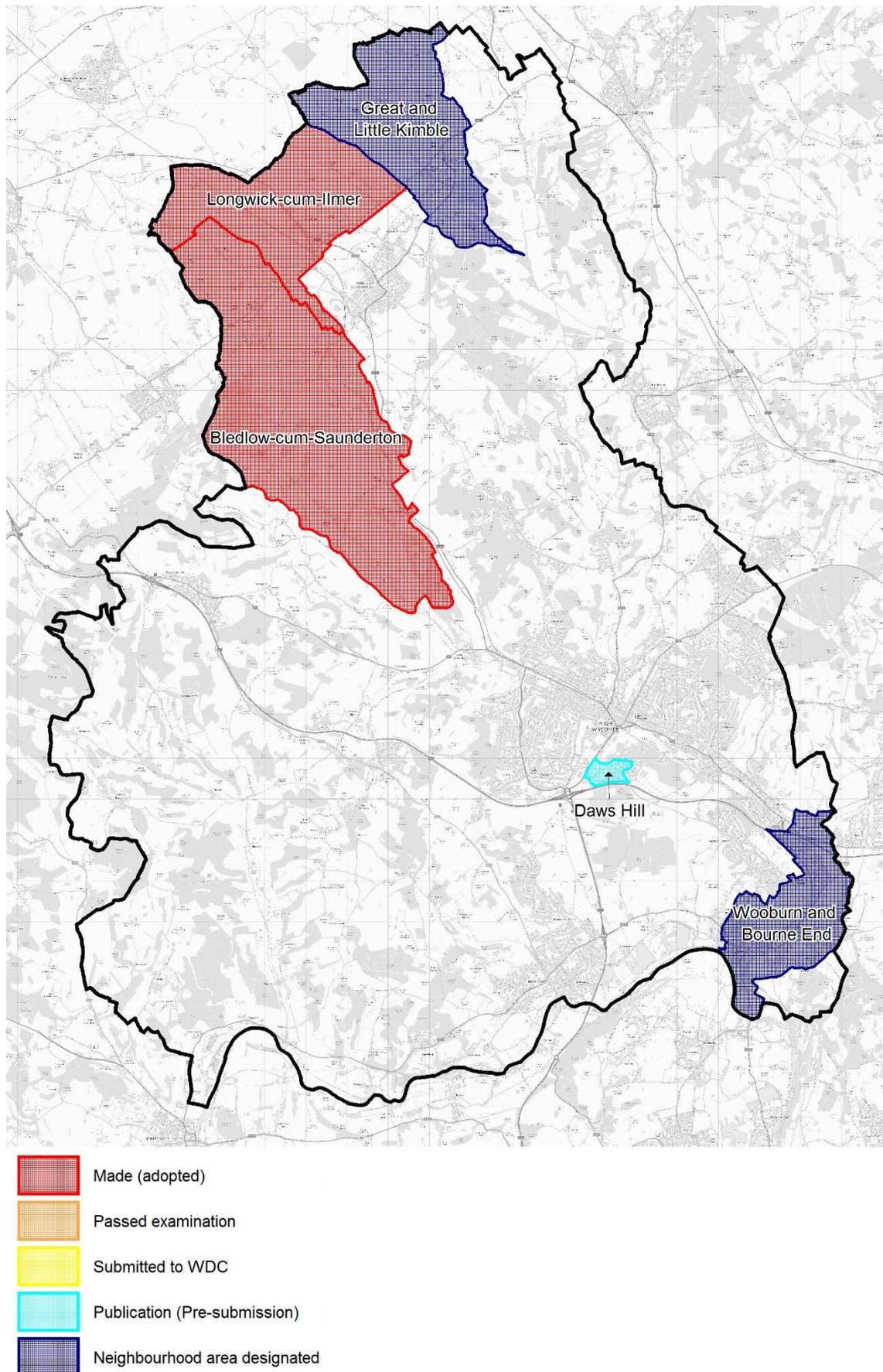
7.1 There are currently two made (adopted) neighbourhood plans within the District, with a further three in production. Table 2 sets out the parishes or neighbourhood areas where plans are being or have been prepared, their current status, and the date that they reached this stage. Figure 1 shows where these areas are located within the district.

*Table 2 Neighbourhood development plans in the Wycombe district*

Neighbourhood area	Status	Date
Bledlow-cum-Saunderton parish	Made (adopted)	23 June 2017
Longwick-cum-Ilmer parish	Made (adopted)	27 March 2018
Daws Hill neighbourhood area	Draft plan published	25 June 2018
Great and Little Kimble-cum-Marsh parish	Neighbourhood area designated	13 November 2017
Wooburn and Bourne End parish	Neighbourhood area designated <sup>37</sup>	9 February 2015

<sup>37</sup> Wooburn and Bourne End parish have consulted locally on a pre-regulation 14 draft plan in January 2018.

Figure 1 Location of neighbourhood development plans in the Wycombe district



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

- 8.1 TP1 Topic Paper 1: The Strategy sets out in detail how the preparation of this Local Plan has been a major challenge as a result of the scale of the needs of the District – for housing, jobs and infrastructure – when set beside the extensive constraints of the District, and in particular the fact that over three quarters of the District is covered by nationally recognised constraints set out in footnote 9 of paragraph 14 of the NPPF.
- 8.2 The Council has tested a wide range of options to assess how those needs might be met, and developed an extensive evidence base as part of that testing process.
- 8.3 Despite this process, the Council has concluded that it cannot meet all of its needs within the District without allowing development in locations where footnote 9 requires development to be restricted, or without there being adverse impacts that significantly and demonstrably outweigh the benefits.
- 8.4 Consequently the Council has an agreement in place whereby all the unmet housing need from Wycombe District will be accommodated in the Vale of Aylesbury Local Plan. There is also a recognition that the shortfall of employment land in Wycombe District, when assessed against the demand-led forecast, is capable of being accommodated by surplus provision in Aylesbury Vale.
- 8.5 Given this spatial context, the ability of the Strategy to be flexible and respond to changing circumstances is necessarily limited – because if there were flexibility, this would have been taken up in meeting all, or more of, its objectively assessed needs, rather than seeking assistance from neighbouring authorities. Indeed building in flexibility into, for example, the housing land supply would have been inappropriate because it would have resulted in requesting Aylesbury Vale to accommodate more unmet needs than is required.

Appendix 1: Settlement Hierarchy summary table<sup>38</sup>

	Settlement	Key Services	Higher-order Services	Pub. Transport
Tier 1*	High Wycombe (including Downley, Hazlemere/Widmer End/Tylers Green, Penn*, Holmer Green*, Loudwater and Wooburn Green)	8	5	Good
Tier 2*	Marlow	8	5	Good
	Princes Risborough (including Monks Risborough and Whiteleaf)	8	5	Good
	Bourne End/Wooburn (including Well End, Cores End and Abbotsbrook)	8	4	Good
Tier 3	Flackwell Heath	8	3	Fair
	Stokenchurch	8	3	Limited
	Marlow Bottom	7	2	Fair
	Naphill/Walter's Ash	7	0	Fair
	Lane End	8	1	Limited
Tier 4	Great and Little Kimble	4	0	Good
	Hughenden Valley	6	1	Fair
	Lacey Green/Loosely Row	6	0	Fair
	West Wycombe	7	1	Limited
	Great Kingshill (including Heath End*)	5	0	Limited
	Longwick	7	0	Limited
Tier 5	Little Marlow	4	0	Limited
	Radnage	5	0	Limited
	Medmenham	5	0	Fair
	Bledlow Ridge	4	0	Limited
	Speen	4	0	Limited
	Cadmore End	4	0	Limited

<sup>38</sup> SHS1 Settlement Hierarchy Study pp. 17-19, full scoring can be found in the same report, pp. 7-9

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	Settlement	Key Services	Higher-order Services	Pub. Transport
Tier 5	Frieth	4	0	Limited
	Cryers Hill	4	0	None
Tier 6	Hambleden/Pheasant's Mill	5	0	None
	Piddington	4	0	Limited
	Danesfield	1	0	Fair
	Claymoor/Clayhill	2	0	Fair
	Bledlow	4	0	Limited
	Saunderton*	3	0	Limited
	Ibstone	3	0	Limited
	Beacons Bottom (inc. Studley Green and Horsleys Green)	3	0	Limited
	Askett	2	0	Limited
	North Dean	3	0	Limited
	Hedsor	1	0	None
	Bovingdon Green/Marlow Common	3	0	None
	Great and Little Hampden	3	0	Limited
	Bryants Bottom & Denner Hill	1	0	Limited
	Fawley	1	0	Fair
	Terrick	2	0	Fair
	Butlers Cross	3	0	Limited
	Bradenham	2	0	Limited
	Bolter End	2	0	Limited
	Wheeler End	2	0	Limited
	Mill End	0	0	Fair
	Moor Common	1	0	Limited
	Ilmer	1	0	Limited
Skirmett	3	0	None	
Ellesborough	2	0	Limited	

Settlement	Key Services	Higher-order Services	Pub. Transport
Fingest	2	0	None
Meadle	1	0	None
Owlswick	1	0	None
North Lee	0	0	None
Turville Heath	0	0	None

### Key

Key services	Higher order services	Public transport
8	5	Good
6-7	3-4	Fair
3-5		
1-2	1-2	Limited
None	None	None