

Inspector's follow up questions – October 2018

Q2. Strategic Context

1. Question

In Matter 2, question 4, I asked if the Plan reflect the strategies and proposals of infrastructure providers. In response the Council's statement indicated that the submitted Plan reflected most but not all the known strategies and proposals of infrastructure providers. The exception being the key strategic projects in relation to the Cambridge – Milton Keynes – Oxford Arc and the third runway at Heathrow, which were omitted because: they had not reached final decision stage; their impacts on the District had yet to be established; and that these matters would need to be addressed through a review of the Plan. As a consequence, the Plan is silent on the subject of both of these key strategic projects.

I am however, mindful that significant progress has been made on these projects at strategic and national level including: the publication of the Partnering for Prosperity: A new deal for the Cambridge – Milton Keynes – Oxford Arc Strategy by the National Infrastructure Commission in November 2017; the announcement of Government support for the scheme in the 2017 Budget Statement; Government approval of the defined corridor for the Oxford – Cambridge Expressway in September 2018; and the issuing of the Airport National Policy Statement: new runway capacity and infrastructure at airports in the south-east of England in June 2018.

In light of these developments, I am concerned that the Plan's continued silence in respect of these projects would raise questions about its soundness. I am interested to understand: the Council's views on the potential growth implications of these strategic projects for the District; any changes necessary to the Plan to explain the implications of these strategic projects; and whether the submitted Plan is, or can be made, flexible enough to accommodate some of the early growth requirements of these proposals without requiring review.

2. Response

The Council agrees that there is now more information about the Oxford – Cambridge Growth Arc and the third runway at Heathrow. This information has emerged since the Plan was published in October 2017, and indeed, since the first week of hearings on strategic matters in July 2018. However, the Council believes that both projects are still at a very early stage in terms of understanding the growth implications for the District.

2.1. Oxford – Cambridge Growth Arc: current status

In November 2017 the NIC published the 'Partnering for Prosperity' final report on the Growth Arc¹. The report made a number of recommendations to the Government for achieving the ambitions of the growth arc, and on 29 October 2018 the Government published its formal response to these.

Recommendation 7 refers to developing a spatial vision across the whole Arc no later than summer 2019, and for local authorities to work in defined sub-regions to prepare statutory spatial plans for submission by April 2020. Sub-regions should be defined by April 2018 (preferably by local authorities but if not, by the Secretary of State).

¹ <https://www.nic.org.uk/wp-content/uploads/Partnering-for-Prosperty.pdf>

- The Government will publish an ambitious, corridor-wide Joint Vision Statement for the Arc to 2050 with local partners by spring 2019.
- The Government's response does not commit to the other deadlines set out in the recommendation. It gives more general overall endorsement to the principle of local planning authorities working together on joint statutory plans, urging them to work together and where appropriate, to develop joint statutory plans at the earliest opportunity.
- Where the Government sees a clear need for doing so, it agrees that the Secretary of State will use powers to direct the preparation of joint plans.
- The Government is exploring the best way to set out how jobs, homes and infrastructure will be planned together.

Recommendation 8 refers to putting in place sub-regional and arc-wide governance arrangements, establishing growth board arrangements in the central section by April 2018, ensuring these are constituted as planning joint committees and empowered to take decisions on... strategic statutory spatial plan(s). It seeks the constitution of statutory combined authorities no later than 2022. Growth boards across the Arc are to establish an arc-wide 'Strategic Partnership Board' by summer 2018.

- The Government's response says it will work with local partners to agree a governance structure by spring 2019.
- The Government will ensure that growth in the corridor is underpinned by the appropriate governance structures and delivery vehicles. It gives no formal commitment on joint committees or combined authorities, other than 'welcoming working with local partners on proposals for bringing forward combined authorities or other changes to local government in the Arc.'

Authorities affected by the Growth Arc are actively negotiating governance arrangements but they are some way off from preparing the joint statutory plans which the Government's response indicates to be an appropriate integrated approach.

It should also be noted that on 1 November 2018 the Secretary of State for MHCLG issued a written statement regarding the future organisation of local government in Buckinghamshire.² In it he confirmed that he would implement the proposal for a single unitary council for the whole of the county, replacing the County Council and four District Councils. If Parliament approves this legislation the new council will be established on 1 April 2020 with the first elections to the council held on 7 May 2020.

It therefore seems unlikely that a plan review would be for the former Wycombe District area alone, but for a spatial strategy covering a wider area. At this stage and in this context, it would be difficult to anticipate how growth might be distributed across such an area.

On 12 September 2018, the Government announced that their preferred corridor for the Oxford to Cambridge Expressway would be Corridor B (B1 & B3). This is a very broad corridor (of 13

² <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Lords/2018-11-01/HLWS1028/> /

miles' width) within which further more detailed route options are being developed. The current programme is to:

- Consult on these detailed options in autumn 2019
- Announce the preferred route in autumn 2020
- Begin construction in 2025
- Open in 2030

While it is true to say that the Expressway is scheduled to open within the Plan Period of the WDLP, it is not at this stage possible to say where new or expanded settlements might be distributed across a very large area. Based on Corridor B, it seems unlikely that these would be within the District and in any event a more integrated approach is required to address this.

Other than a stated aspiration for up to 1 million homes by 2050 there is no indication of how growth is likely to be distributed across a very large area.

2.2. Heathrow – current status

On 25 June 2018, Parliament formally backed the Heathrow expansion, with MPs voting in support of the Government's Airports National Policy Statement (Airports NPS), which includes support for a new North West runway. This decision is currently subject to a legal challenge from a group of claimants, which includes a number of local authorities.³

The best case scenario for the delivery of a third runway in operation would appear to be 2026, based on information from Heathrow Airport Ltd (HAL). The submission of the Development Consent Order is scheduled for 2020, with consent expected from the Secretary of State in 2021.

Most authorities who may be affected by the proposals are members of the Heathrow Strategic Planning Group (HSPG). WDC is an Observer member of the HSPG but not a Full member. The core group of authorities together with Heathrow Airport Limited (HAL) commissioned a Joint Evidence Base and Infrastructure Study (JEBIS) prepared by Quod / ARUP which is currently in draft form and is not in the public domain. The draft specifically states that the findings and conclusions represent the views of consultants and do not form part of the evidence base of any current or draft Local Plans, and that no policy conclusions can be drawn.

It would therefore be difficult for it to inform proposals in the Wycombe Local Plan at this stage. Apart from the loose coalition of authorities in the HSPG⁴, there are no formal governance arrangements in place for wider strategic planning for the Heathrow area.

2.3. Potential growth implications

The Plan was published and submitted on the basis of the evidence available and the strategic context at the time.

Whilst these projects have moved on somewhat they are still at early stages, and while some evidence has been developed, there is no clear information on the approach to, nor actual distribution of growth at even a strategic level for either of these projects. While some

³ Hillingdon, Wandsworth, Richmond, Hammersmith and Fulham, Royal Borough of Windsor and Maidenhead, Greenpeace and the Mayor of London

⁴ [https://www.spelthorne.gov.uk/media/18437/Heathrow-Strategic-Planning-Group-Accord/pdf/Heathrow_Strategic_Planning_Group_Accord_\(1\).pdf](https://www.spelthorne.gov.uk/media/18437/Heathrow-Strategic-Planning-Group-Accord/pdf/Heathrow_Strategic_Planning_Group_Accord_(1).pdf)

information exists on the scale of growth, in the case of the Growth Arc, it is an untested aspiration rather than an evidenced capacity. As a result, and given the uncertain status of the proposals, these projects do not yet provide an evidence base by which to assess the housing or economic needs of the district.

It is therefore not possible to plan meaningfully for these in the absence of a clear evidence base or strategic context, and not appropriate to in the interests of good strategic planning. Hence the Council believes that the correct approach is through Plan review working across a much wider area.

In terms of the Oxford – Cambridge Growth Arc, this represents a very large growth area; the District is at the southern edge of this and is heavily constrained by Green Belt and the Chilterns AONB.

By contrast, large expanses of land within the Arc are not subject to similar constraints and will clearly be the focus for main growth. National policy in the NPPF directs that opportunities for growth will need to prioritise undesignated areas first.

By choosing Expressway Corridor B, the Government has taken this key intervention further north and further away from the District. This better aligns it to the East-West Rail (EWR) corridor. However, EWR now does not deliver a step change in infrastructure within the District as the twin-tracking of the line between Princes Risborough and Aylesbury was taken out of the scope of the project late in 2017. Network Rail's Route Strategy to 2042 now identifies this as a longer term aspiration.

It is likely that this rail/road corridor will become the focus for the largest growth including new settlements. Clearly there is no strategic plan at present that sets out this thinking, but this seems to be a logical approach. As such, whilst Wycombe will no doubt need to continue to optimise development within the District, this will continue to be set within the constraints above.

More fundamentally there needs to be a coordinated strategic approach across the Arc as a whole and within the different sub-regions of the Arc.

In relation to Heathrow, there is no formal evidence which might inform the scale or distribution of growth to be planned for.

The Household Projections issued in September 2018 imply a lower level of household growth for the District (see the Council's response to Inspector's Question 3). If the Plan were to continue with its current requirement then this introduces some flexibility within which the District could respond to these strategic projects.

In conclusion, the Council's view on the growth implications is that they are highly uncertain, and the particular implications cannot be meaningfully identified at this time. As a result, these projects do not provide an evidence base for the assessment of need in line with the NPPF, and specific changes in relation to the needs to be addressed in the plan are unnecessary. Further, the implications can be addressed through the review of the Plan.

2.4. Changes to the Plan

The Council agrees that the Inspector's question provides an opportunity to update contextual information in the Plan document. It can explain how the Council will respond to this in the future when there is more information and firmly established governance structures, as part of a Plan Review within the context of a wider strategic coordinated approach.

We propose adding information in the following places:

- Modifying the Executive Summary on page xxi, at paragraph 4
- After para 1.15 (p. 7) under 'Planning Strategically'
- As more items in the bulleted list within para 1.18 (p.10, other plans and projects)
- Changes to paras 2.8 and 2.9 (p.17), regarding Expressway and Heathrow respectively
- Changes to para 4.21 (p. 35) as part of the supporting text to CP2, Overall spatial strategy

Proposed changes are set out in a schedule at the end of this response.

2.5. Whether the submitted Plan is, or can be made, flexible enough to accommodate some of the early growth requirements

As explained above, we know very little about the early growth requirements. What we can logically conjecture about the projects indicates that an appropriate strategy will be to look first at unconstrained areas which are spatially closer to the projects. Planning-in flexibility will be difficult while the scale and distribution are not yet known.

There is as yet no evidence base to inform the spatial distribution of growth in housing or employment associated with the Growth Arc or the Heathrow expansion.

It is important to remember that the Plan is bringing forward higher levels of growth than in the past, and that our housing trajectory is front loaded – so there will be early growth at a significant scale.

Recent decisions are creating additional housing supply, as shown in our response to AP 3.3 regarding 2018 monitoring data, and the subsequent update to Table 6.

The Household Projections issued in September 2018 imply a lower level of household growth for the District (see the Council's response to Inspector's Question 3). If the Plan were to continue with its current requirement then this introduces greater flexibility of supply in the context of objectively assessed need.

Regarding employment growth, our response to AP 4.2 highlighted commitments capable of delivering early growth; and our response to AP 7.13 regarding the Air Park timeline shows delivery by 2020. There are also good delivery prospects of new employment at Princes Risborough. The employment allocations in the Plan are flexible in themselves by virtue of the range of B use classes permissible by the site policies.

What this demonstrates is a good prospect of strong growth in delivery of both housing and employment.

In its formal response to recommendation 7 of the NIC report the Government gave a general overall endorsement to the principle of LPAs working together on joint statutory plans, urging

them to work together and where appropriate, to develop joint statutory plans at the earliest opportunity.

The Council agrees with this approach to addressing the new growth, rather than through existing plans. It is right that the Council participates in this process, recognising that the timescales indicated are very optimistic. Therefore wider considerations will drive the timing of a review rather than the Council itself.

In any event the Amendment of the Town and Country Planning Regulations 2017 (10A) now requires reviews at least every 5 years.

The Council notes that similar questions have been raised by the Inspector of Aylesbury Vale's VALP, and AVDC's response is here:

https://www.aylesburyvaldc.gov.uk/sites/default/files/page_downloads/ED167A%20Appendix%201%20%E2%80%93%20AVDC%20Response%20to%20the%20Inspector%E2%80%99s%20Interim%20Findings_0.pdf

Proposed changes to Plan text

Additions are shown in **Bold** and deletions are ~~struck through~~

The changes are listed in the order in which they appear in the Plan document

- Modifying the Executive Summary on page xxi, at paragraph 4
- After para 1.15 (p. 7) under ‘Planning Strategically’
- As more items in the bulleted list within para 1.18 (p.10, other plans and projects)
- Changes to paras 2.8 and 2.9 (p.17), regarding Expressway and Heathrow respectively
- Changes to para 4.21 (p. 35) as part of the supporting text to CP2, Overall spatial strategy

Where in R19 Plan	Proposed change	Resulting text
<p>Modifying the Executive Summary on page xxi, at paragraph 4</p>	<p>Long term, there are issues of strategic growth and connectivity —both by rail and road— to be addressed. However, the work is not ready this work is still at an early stage to feed into this plan, and a revision to this plan will need to be made later to take that into account. That includes recently confirmed new runway at Heathrow; the work being done by the National Infrastructure Commission on the Oxford To Cambridge Expressway and Growth Arc, and with Highways England on ‘Access to Wycombe’, which is</p>	<p>Long term, there are issues of strategic growth and connectivity to be addressed. However, this work is still at an early stage to feed into this plan, and a revision to this plan will need to be made later to take that into account. That includes the recently confirmed new runway at Heathrow; work being done by the National Infrastructure Commission on the Oxford To Cambridge Expressway and Growth Arc, and with Highways England on ‘Access to Wycombe’, which is</p>

Where in R19 Plan	Proposed change	Resulting text
	considering a range of options to improve access from the M40, including radical alterations to J4.	considering a range of options to improve access from the M40, including radical alterations to J4.
After para 1.15 (p. 7) under 'Planning Strategically', insert new para and renumber subsequent paras accordingly	<p>1.15 The Council has worked proactively with a range of local authorities and other “Duty to Cooperate” bodies to identify and address the key strategic issues. The starting point however was to identify the right geography for addressing housing and economic needs. A study was commissioned by the four Buckinghamshire Districts to identify the housing market area and functional economic market area. The area shown in pink in figure 2 is the housing market area and functional economic market area that Wycombe District falls within. This area does not always follow local authority or local plan area boundaries so from a practical point of view a best fit to local plan areas was identified as Aylesbury Vale, Chiltern, South Bucks and Wycombe Districts.</p> <p>1.16 There are a number of sub-regional strategic initiatives whose development is still at an early stage. This includes the Oxford-Cambridge Growth Arc and associated East-West</p>	<p>1.15 The Council has worked proactively with a range of local authorities and other “Duty to Cooperate” bodies to identify and address the key strategic issues. The starting point however was to identify the right geography for addressing housing and economic needs. A study was commissioned by the four Buckinghamshire Districts to identify the housing market area and functional economic market area. The area shown in pink in figure 2 is the housing market area and functional economic market area that Wycombe District falls within. This area does not always follow local authority or local plan area boundaries so from a practical point of view a best fit to local plan areas was identified as Aylesbury Vale, Chiltern, South Bucks and Wycombe Districts.</p> <p>1.16 There are a number of sub-regional strategic initiatives whose development is still at an early stage. This includes the Oxford-Cambridge Growth Arc and associated East-West Expressway, and the third</p>

Where in R19 Plan	Proposed change	Resulting text
	<p>Expressway, and the third runway at Heathrow. It is too early to say what these projects might imply for growth in the District; the Council expects to actively engage in the formation of appropriate governance structures to steer the preparation of formal strategic plans as part of the process of Plan review.</p>	<p>runway at Heathrow. It is too early to say what these projects might imply for growth in the District; the Council expects to actively engage in the formation of appropriate governance structures to steer the preparation of formal strategic plans as part of the process of Plan review.</p>
<p>As more items in the bulleted list within para 1.18 (p.10, other plans and projects)</p>	<p>1.18 In addition to preparing evidence on key strategic issues, there are a range of other strategic plans and projects that may affect the District. These include:</p> <ul style="list-style-type: none"> • The Strategic Economic Plan – prepared by the Buckinghamshire Thames Valley Local Enterprise Partnership which puts forward proposals to deliver increased prosperity and jobs for Buckinghamshire • The Oxford-Cambridge Growth Arc and East-West Expressway – aiming to deliver up to 1 million new homes by 2050 in a broad area between Oxford and Cambridge, supported by major new road infrastructure 	<p>1.18 In addition to preparing evidence on key strategic issues, there are a range of other strategic plans and projects that may affect the District. These include:</p> <ul style="list-style-type: none"> • The Strategic Economic Plan – prepared by the Buckinghamshire Thames Valley Local Enterprise Partnership which puts forward proposals to deliver increased prosperity and jobs for Buckinghamshire • The Oxford-Cambridge Growth Arc and East-West Expressway – aiming to deliver 1 million new homes in a broad area between Oxford and Cambridge, supported by major new road infrastructure • The third runway at Heathrow, associated infrastructure improvements and economic growth

Where in R19 Plan	Proposed change	Resulting text
	<ul style="list-style-type: none"> • The third runway at Heathrow, associated infrastructure improvements and economic growth 	
Changes to paras 2.8 and 2.9 (p.17), regarding Expressway and Heathrow respectively	<p>2.8 There is also uncertainty around In September 2018, the route of the proposed ‘expressway’ between Oxford and Cambridge being developed by the National Infrastructure Commission, was announced as focusing on the central corridor ‘B’. Whilst it is not expected to be This corridor does not fall within the District though it will is expected to have an impact on the District as part of the strategic road network.</p> <p>2.9 The expansion of Heathrow will also have impacts on the District in terms of associated infrastructure such as the Western Rail Access and increased demand for surface access.</p>	<p>2.8 In September 2018, the route of the proposed ‘expressway’ between Oxford and Cambridge being developed by the National Infrastructure Commission, was announced as focusing on the central corridor ‘B’. This corridor does not fall within the District, though it is expected to have an impact on the District as part of the strategic road network.</p> <p>2.9 The expansion of Heathrow will also have impacts on the District in terms of associated infrastructure such as the Western Rail Access and increased demand for surface access.</p>
Changes to para 4.21 (p. 35) as part of the supporting text to CP2, Overall spatial strategy	<p>4.21 In addition In September 2018, the National Infrastructure Commission is considering the most appropriate announced corridor B as the preferred option for the Oxford to Cambridge Expressway and the Government is proposing a new runway on the western side of Heathrow Airport. Both of these will be</p>	<p>4.21 In September 2018 the National Infrastructure Commission announced corridor B as the preferred option for the Oxford to Cambridge Expressway and the Government is proposing a new runway on the western side of Heathrow Airport. Both of these will be a significant influence on the strategic geography of</p>

Where in R19 Plan	Proposed change	Resulting text
	<p>a significant influence on the strategic geography of Buckinghamshire as a whole, and therefore for Wycombe District. At this stage it is too early to say what the implications may be for the District in terms of homes and jobs; however, the Council expects to engage actively in overarching governance structures to steer the preparation of formal strategic plans and a wider spatial strategy which responds to these.</p>	<p>Buckinghamshire as a whole, and therefore for Wycombe District. At this stage it is too early to say what the implications may be for the District in terms of homes and jobs; however, the Council expects to engage actively in overarching governance structures to steer the preparation of formal strategic plans and a wider spatial strategy which responds to these.</p>